

Maria Jose Moncada
Assistant General Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5795
(561) 691-7135 (Facsimile)
Email: maria.moncada@fpl.com

May 7, 2025

VIA HAND DELIVERY

Mr. Adam Teitzman Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 20250011-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information contained in its responses to the Florida Retail Federation's ("FRF") First Request for Production of Documents (No. 1). The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the documents containing confidential information, on which the confidential information has been highlighted. Exhibit A is submitted for filing in an envelope marked "EXHIBIT A" – CONFIDENTIAL. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. For those documents in Exhibit A are confidential in their entirety, FPL has included only an identifying cover page in Exhibit B. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declarations in support of FPL's Request. In accordance with Rule 25-22.006(3)(d), Florida Administrative Code, FPL requests confidential treatment of the information in Exhibit A pending disposition of FPL's Request for Confidential Classification.

Please contact me if you or your Staff has any questions regarding this filing.

Sincerely,

/s/ Maria Jose Moncada Maria Jose Moncada Fla. Bar No. 0773301

Enclosure

cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light

Company for Base Rate Increase

Docket No: 20250011-EI

Date: May 7, 2025

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSE TO THE FLORIDA RETAIL FEDERATION'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1)

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative

Code, Florida Power & Light Company ("FPL") hereby requests confidential classification of

certain documents and information provided in its response to the Florida Retail Federation's

("FRF") First Request for Production of Documents (No. 1) ("Confidential Information"). In

support of its request, FPL states as follows:

1. FPL served a response to FRF's First Request for Production of Documents (No.

1) on May 7, 2025. Consistent with Rule 25-22.006, Florida Administrative Code, this request is

being filed contemporaneously with the service of those responses to request confidential

classification of certain information contained therein.

2. The following exhibits are attached to and made a part of this Request:

a. Exhibit A consists of a copy of the confidential documents on which all

information that FPL asserts is confidential has been highlighted.

b. Exhibit B is a redacted version of the confidential documents.

c. Exhibit C is a table that identifies the information for which confidential

treatment is being sought and references the specific statutory basis for the

claim of confidentiality and identifies the declarant who supports the

requested classification.

- d. Exhibit D consists of the declaration of Tiffany Cohen in support of this Request.
- 3. FPL submits that the Confidential Information is intended to be and has been treated and maintained by FPL as confidential business information, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, Florida Statutes, such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.
- 4. As described more fully in the declaration included in Exhibit D, the Confidential Information includes information containing proprietary confidential business information relating to competitive interests of FPL, the disclosure of which impair the competitive business of FPL. Specifically, the information pertains to FPL's long-term planning and business strategy related to data centers. This information is protected by Section 366.093(3) (e), Fla. Stat.
- 5. Upon a finding by the Commission that the Confidential Information is proprietary and confidential business information, the information should not be declassified for at least eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* Section 366.093(4), Florida Statutes.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this 7th day of May, 2025,

By: /s/ Maria Jose Moncada

John T. Burnett Vice President and General Counsel Florida Bar No. 173304 john.t.burnett@fpl.com Maria Jose Moncada Assistant General Counsel Florida Bar No. 0773301 maria.moncada@fpl.com Christopher T. Wright Managing Attorney Fla. Auth. House Counsel No. 1007055 chrisopher.wright@fpl.com William P. Cox Senior Counsel Florida Bar No. 0093531 will.p.cox@fpl.com Joel T. Baker Senior Attorney Florida Bar No. 0108202 joel.baker@fpl.com Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420

Phone: 561-304-5253

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 7th day of May, 2025:

Shaw Stiller	Walt Trierweiler
Timothy Sparks	Mary A. Wessling
Office of General Counsel	Office of Public Counsel
Florida Public Service Commission	The Florida Legislature
2540 Shumard Oak Blvd.	_
	111 W. Madison Street, Room 812
Tallahassee, Florida 32399-0850	Tallahassee, Florida 32399
sstiller@psc.state.fl.us	trierweiler.walt@leg.state.fl.us
tsparks@psc.state.fl.us	wessling.mary@leg.state.fl.us
discovery-gcl@psc.state.fl.us	Office of Public Counsel
L. Newton/A. George/T. Jernigan/J. Ely/	Bradley Marshall/Jordan Luebkemann
M. Rivera/E. Payton	111 S. Martin Luther King Jr. Blvd.
139 Barnes Drive, Suite 1	Tallahassee FL 32301
Tyndall AFB FL 32403	(850) 681-0031
(850) 283-6347	(850) 681-0020
Ashley.George.4@us.af.mil	bmarshall@earthjustice.org
ebony.payton.ctr@us.af.mil	jluebkemann@earthjustice.org
Leslie.Newton.1@us.af.mil	flcaseupdates@earthjustice.org
Michael.Rivera.51@us.af.mil	Florida Rising, Inc., Environmental
thomas.jernigan.3@us.af.mil	Confederation of Southwest Florida, Inc.,
james.ely@us.af.mil	League of United Latin American Citizens
Januaria Marianini	League of Office Latin American Citizens
Federal Executive Agencies	of Florida
	of Florida
Federal Executive Agencies Danielle McManamon	of Florida Jon C. Moyle, Jr./Karen A. Putnal
Pederal Executive Agencies Danielle McManamon 4500 Biscayne Blvd. Suite 201	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137	of Florida Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org	of Florida Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens of Florida	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com Florida Industrial Power Users Group
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens of Florida William C. Garner	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com Florida Industrial Power Users Group Nikhil Vijaykar
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens of Florida William C. Garner 3425 Bannerman Road	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com Florida Industrial Power Users Group Nikhil Vijaykar Keyes & Fox LLP
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens of Florida William C. Garner 3425 Bannerman Road Tallahassee FL 32312	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com Florida Industrial Power Users Group Nikhil Vijaykar Keyes & Fox LLP 580 California Street, 12th Floor
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens of Florida William C. Garner 3425 Bannerman Road Tallahassee FL 32312 (850) 320-1701	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com Florida Industrial Power Users Group Nikhil Vijaykar Keyes & Fox LLP 580 California Street, 12th Floor San Francisco, CA 94104
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens of Florida William C. Garner 3425 Bannerman Road Tallahassee FL 32312 (850) 320-1701 (850) 792-6011	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com Florida Industrial Power Users Group Nikhil Vijaykar Keyes & Fox LLP 580 California Street, 12th Floor San Francisco, CA 94104 (408) 621-3256
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens of Florida William C. Garner 3425 Bannerman Road Tallahassee FL 32312 (850) 320-1701 (850) 792-6011 bgarner@wcglawoffice.com	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com Florida Industrial Power Users Group Nikhil Vijaykar Keyes & Fox LLP 580 California Street, 12th Floor San Francisco, CA 94104 (408) 621-3256 nvijaykar@keyesfox.com
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens of Florida William C. Garner 3425 Bannerman Road Tallahassee FL 32312 (850) 320-1701 (850) 792-6011	Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com Florida Industrial Power Users Group Nikhil Vijaykar Keyes & Fox LLP 580 California Street, 12th Floor San Francisco, CA 94104 (408) 621-3256

James W Brew	Katelyn Lee				
Laura Wynn Baker	Senior Associate, Market Development &				
Joseph R. Briscar	Public Policy				
Sarah B. Newman	Lindsey Stegall				
1025 Thomas Jefferson Street NW	Senior Manager, Market Development &				
Suite 800 West	Public Policy				
Washington, DC 20007	EVgo Services, LLC				
(202) 342-0800	1661 E. Franklin Ave.				
(202) 342-0807	El Segundo, CA 90245				
jbrew@smxblaw.com	(213) 500-9092				
lwb@smxblaw.com	Katelyn.Lee@evgo.com				
jrb@smxblaw.com	Lindsey.Stegall@evgo.com				
sbn@smxblaw.com	EVgo Services, LLC				
Florida Retail Federation					
Steven W. Lee	Stephanie U. Eaton				
Spilman Thomas & Battle, PLLC	Spilman Thomas & Battle, PLLC				
1100 Bent Creek Boulevard, Suite 101	110 Oakwood Drive, Suite 500				
Mechanicsburg, PA 17050	Winston-Salem, NC 27103				
(717) 791-2012	(336) 631-1062				
(717) 795-2743	(336) 725-4476				
slee@spilmanlaw.com	seaton@spilmanlaw.com				
Walmart, Inc.	Walmart, Inc.				
Robert E. Montejo	Stephen Bright				
Duane Morris LLP	Jigar J. Shah				
201 S. Biscayne Blvd., Suite 3400	1950 Opportunity Way, Suite 1500				
Miami, Florida 33131-4325	Reston, Virginia 20190				
(202) 776-7827	(781) 206-7979				
REMontejo@duanemorris.com	(703) 872-7944				
Electrify America, LLC	steve.bright@electrifyamerica.com				
	jigar.shah@electrifyamerica.com				
	Electrify America, LLC				

/s/ Maria Jose Moncada

Maria Jose Moncada Assistant General Counsel Florida Bar No. 0773301

Attorney for Florida Power & Light Company

EXHIBIT B

PUBLIC VERSION OF THE DOCUMENTS

Public Version(s) of the Document(s) attached	<u>X</u>
Public Version(s) of the Document(s) attached via USB	

The document responsive to FRF's First Request for Production of Documents No. 1, Bates Nos. 040886-041603, is confidential in its entirety.

The document responsive to FRF's First Request for Production of Documents No. 1, Bates Nos. 040886-041603, is confidential in its entirety.

EXHIBIT C JUSTIFICATION TABLE

EXHIBIT C

COMPANY:

Florida Power & Light Company

TITLE:

Petition by Florida Power & Light Company for Base Rate

Increase

DOCKET NO.:

20250011-EI

DATE:

May 7, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confid- ential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FRF 1 st POD, No. 1	040886	041603	FPL PowerPoint Presentations related to data center strategy	718	Y	All	(e)	Tiffany Cohen

EXHIBIT D DECLARATION(S)

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by Florida Power & Light Company for Base Rate Increase

DECLARATION OF TIFFANY COHEN

- 1. My name is Tiffany Cohen. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Financial Planning and Rate Strategy. I have personal knowledge of the matters stated in this written declaration.
- 2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in FPL's response to the Florida Retail Federation's First Request for Production of Documents, No. 1. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to FPL's competitive interests, the disclosure of which impair the competitive business of FPL. Specifically, the information contains information pertaining to FPL's long term planning and business strategy related to data centers. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.
- 3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.
- 4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

Ti	iffany Cohen	
	Tiffany Cohen	
Date:	05/07/2025	

Docket No: 20250011-EI