



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 8, 2025

**VIA HAND DELIVERY**

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

**REDACTED**

RECEIVED - FPSC  
2025 MAY -8 PM 3:03  
COMMISSION  
CLERK

**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 Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's Fourth Request for Production of Documents (No. 54). 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 declaration 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)

COM  
AFO 1 redacted  
APA  
ECO  
ENG  
GCL  
IDM  
CLK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light  
Company for Base Rate Increase

Docket No: 20250011-EI

Date: May 8, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSE TO  
FLORIDA RISING, LEAGUE OF UNITED LATIN AMERICAN CITIZENS AND  
ENVIRONMENTAL CONFEDERATION OF SOUTHWEST FLORIDA'S  
FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 54)**

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 Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's ("FL Rising") Fourth Request for Production of Documents (No. 54) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served a response to FL Rising Fourth Request for Production of Documents (No. 54) on May 8, 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 Andrew Whitley 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 or the provider of the information, the disclosure of which would impair the competitive business of the provider of the information. In addition, the materials contain information concerning bids or other contractual prices or data the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the information contains integration studies and/or proposals prepared by a third party vendor which are proprietary to that vendor. This information is protected by Sections 366.093(3)(d) and (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 8th 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 8th day of May, 2025:

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

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

/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   X  

Public Version(s) of the Document(s) attached via USB

The documents responsive to FEL's Fourth Request for Production of Documents No. 54, Bates Nos. 040739-040804, are confidential in their 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 8, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FRF 1 <sup>st</sup> POD, No. 1	040739	040764	E3 Solar Integration Study – Exhibit A	26	Y	All	(d) and (e)	Andrew Whitley
FRF 1 <sup>st</sup> POD, No. 1	040775	040804	E3 Solar Integration Study – Exhibit B	30	Y	All	(d) and (e)	Andrew Whitley
FRF 1 <sup>st</sup> POD, No. 1	040765	040774	E3 Solar Integration Study – Exhibit C	10	Y	All	(d) and (e)	Andrew Whitley

**EXHIBIT D**  
**DECLARATION(S)**

**FIRST REVISED EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light Company  
for Base Rate Increase and Rate Unification

Docket No: 20250011-EI


**DECLARATION OF ANDREW WHITLEY**

1. My name is Andrew Whitley. I am currently employed by Florida Power & Light Company ("FPL") as Engineering Manager, FPL Finance. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in my response to FL Rising's Fourth Request for Production of Documents No. 54. The documents or materials that I have reviewed and which are proprietary confidential business information contain information relating to competitive interests of FPL or the provider of the information, the disclosure of which would impair the competitive business of the provider of the information. In addition, the materials contain information concerning bids or other contractual prices or data the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the information contains integration studies and/or proposals prepared by a third party vendor which are proprietary to that vendor. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional eighteen (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 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.



Andrew Whitley

Date: 05/08/2025