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May 13, 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 13 AM 11:45  
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 the Office of Public Counsel's Fourteenth Request for Production of Documents (No. 135). 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

COM

AFD

APA

ECO

ENG

GCL

IDM

CLK

Enclosure

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

1 redacted  
Exh "B"

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No: 20250011-EI

Date: May 13, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSE  
TO THE OFFICE OF PUBLIC COUNSEL'S FOURTEENTH REQUEST  
PRODUCTION OF DOCUMENTS (NO. 135)**

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 Office of Public Counsel's ("OPC") Fourteenth Request for Production of Documents (No. 135) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served a response to OPC's Fourteenth Request for Production of Documents (No. 135) on May 13, 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 which are confidential in their entirety.
- b. Exhibit B is a redacted version of the confidential documents. As the documents in Exhibit A are confidential in their entirety, FPL has included only an identifying cover page in Exhibit B
- 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 Amy Marante 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 contains or constitutes internal auditing controls, reports or notes of internal auditors, or information relating to internal auditing reports issued in 2022-2024. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing scope, process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may impact the effectiveness of the Internal Auditing department itself. This information is protected by Section 366.093(3)(b), 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 13th day of May, 2025,

By: /s/ Maria Jose Moncada

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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 13th day of May, 2025:

<p>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</p>	<p>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></p>
<p>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></p>	<p>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></p>
<p>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></p>	<p>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></p>
<p>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></p>	<p>Nikhil Vijaykar Keyes &amp; Fox LLP 580 California Street, 12th Floor San Francisco, CA 94104 (408) 621-3256 nvijaykar@keyesfox.com <b>EVgo Services, LLC</b></p>

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 OPC's Fourteenth  
Request for Production of Documents No. 135,  
Bates Nos. 042098-042348, and 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 13, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 14 <sup>th</sup> POD, No. 135	042231	042309	6-28-2024 – Storm Force Follow-up Review.pdf	79	Y	All	(b)	Amy Marante
OPC 14 <sup>th</sup> POD, No. 135	042152	042230	8-6-2024 - Employee Expense Analytics Audit.pdf	79	Y	All	(b)	Amy Marante
OPC 14 <sup>th</sup> POD, No. 135	042107	042151	8-29-2024 Nuclear Access Authorization Audit - Final Audit Report.pdf	45	Y	All	(b)	Amy Marante
OPC 14 <sup>th</sup> POD, No. 135	042319	042348	12-12-2024 - IRA Tax Credit Transferability - Final Audit Report.pdf	30	Y	All	(b)	Amy Marante
OPC 14 <sup>th</sup> POD, No. 135	042098	042106	2-8-2022 - Battery Storage Warranty Contractual Requirements Audit.pdf	9	Y	All	(b)	Amy Marante
OPC 14 <sup>th</sup> POD, No. 135	042316	042318	3-8-2023 - FPL Okeechobee Hydrogen Pilot Project Review.pdf	3	Y	All	(b)	Amy Marante
OPC 14 <sup>th</sup> POD, No. 135	042313	042315	6-10-2022 - Storm Protection Plan Cost Recovery Clause Review.pdf	3	Y	All	(b)	Amy Marante
OPC 14 <sup>th</sup> POD, No. 135	042310	042312	6-23-2022 - 2022 Rate Base Solar Project Construction Review.pdf	3	Y	All	(b)	Amy Marante

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

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition by Florida Power & Light Company  
for Base Rate Increase

Docket No: 20250011-EI


**DECLARATION OF AMY MARANTE**

1. My name is Amy Marante. I am currently employed by Florida Power & Light Company ("FPL") as Director, Internal Audit. 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 FPL's response to OPC's Fourteenth Request for Production of Documents, No. 135. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information, contain or constitute internal auditing controls, reports or notes of internal auditors, or information relating to internal auditing reports issued in 2022-2024. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing scope, process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may impact the effectiveness of the Internal Auditing department itself. 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.

  
Amy Marante

Date: 5/12/25