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May 19, 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 19 PM 4:23
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 Fifth Set of Interrogatories (No. 74) and Fifth Request for Production of Documents (Nos. 59 and 60). 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 2 redacted
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

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 19, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN IT'S RESPONSES TO
FLORIDA RISING, LEAGUE OF UNITED LATIN AMERICAN CITIZENS AND
ENVIRONMENTAL CONFEDERATION OF SOUTHWEST FLORIDA'S FIFTH
SET INTERROGATORIES (NO. 74) AND FIFTH REQUEST FOR
PRODUCTION OF DOCUMENTS (NOS. 59 AND 60)**

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 responses to Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's ("FL Rising") Fifth Set of Interrogatories (No. 74) and Fifth Request for Production of Documents (Nos. 59 and 60) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its responses to FL Rising's Fifth Set of Interrogatories (No. 74) and Fifth Request for Production of Documents (Nos. 59 and 60) on May 19, 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. For documents that are confidential in their entirety, FPL has only included identifying cover pages 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 declarants who support the requested classification.
- d. Exhibit D consists of the declarations of Andrew Whitley, Thomas Broad and Jessica Buttress 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 declarations included in Exhibit D, the Confidential Information contains information containing information relating to competitive interests of FPL or the provider of the information, the disclosure of which would impair the competitive business of FPL or the provider of the information. Specifically, the confidential information contains strategic planning assumptions made by FPL, a study that was prepared by a third party for FPL and which is proprietary to that third party, and information related to FPL's employee incentive plans. This information is protected by Section 366.093(3)(e), Florida Statutes.

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 19th day of May, 2025,

By: /s/ Maria Jose Moncada
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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 19th day of May, 2025:

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/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 _____

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

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 19, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FEL 5th INT, No. 74	040730	040730	Interrogatory 74 Narrative Response	1	Y	Lines 4-7, as marked	(e)	Andrew Whitley
FEL 5th POD, No. 59	042356	042374	Black & Veatch O&M and Performance Study	19	Y	All	(e)	Thomas Broad
FEL 5th POD, No. 60	042390	042412	2025 FPL Corporate Incentive Plan	23	Y	All	(e)	Jessica Buttress
FEL 5th POD, No. 60	042413	042413	2025 FPL Operational Measures	1	Y	All	(e)	Jessica Buttress

EXHIBIT D
DECLARATION(S)

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20250011-EI

DECLARATION OF JESSICA BUTTRESS

1. My name is Jessica Buttress. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Executive Services and Compensation. 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 FL Rising's Fifth Request for Production of Documents, No. 60. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary competitive business information contain information relating to competitive interests of FPL, the disclosure of which would impair their competitive business interests of FPL. Specifically, the material contains information related to FPL's employee incentive plans. 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.



Jessica Buttress

Date: 5/19/25

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 Fifth Set of Interrogatories, No. 74. 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 FPL. Specifically, the information relates to strategic planning assumptions made by FPL. 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: 05/19/2025

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by Florida Power & Light Company for
Base Rate Increase

Docket No: 20250011-EI

DECLARATION OF THOMAS BROAD

1. My name is Thomas Broad. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, PGD Fossil Operations and Pipelines. 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 FL Rising's Fifth Request for Production of Documents, No. 59. 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 and a third party's competitive interests, the disclosure of which impair the competitive business interests of FPL and the provider of the information. Specifically, the information contains a study that was prepared by a third party for FPL and which is proprietary to that third party. 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.



Thomas Broad

Date: 5/18/25