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June 17, 2025

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

REDACTED

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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 Certain Information Contained in the Testimony of Florida Energy for Innovation Association Witness Mohamed Ahmed, Ph.D. 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. 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.

- COM _____
- AFD 1 redacted Exh "B"
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

Enclosure

Sincerely,

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

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: June 17, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION CONTAINED IN
THE TESTIMONY OF FLORIDA ENERGY FOR INNOVATION
ASSOCIATION'S WITNESS MOHAMED AHMED, Ph.D.**

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 information contained in the testimony of Florida Energy for Innovation Association ("FEIA") witness Mohamed Ahmed, Ph.D. In support of its request, FPL states as follows:

1. On June 9, 2025, FPL filed its Notice of Intent to Request Confidential Classification of Certain Information Contained in The Testimony of Florida Energy for Innovation Association's Witness Mohamed Ahmed, Ph.D. ("FPL's Notice of Intent").

2. On June 9, 2025, FEIA filed the testimony and exhibits of witness Mohamed Ahmed, Ph.D. as confidential under seal pursuant to FPL's Notice of Intent.

3. After reviewing the testimony of FEIA witness Mohamed Ahmed, Ph.D., FPL has identified the portions of the testimony that are confidential (the "Confidential Information"). The Confidential Information was information that was provided by FPL to FEIA and the other parties as confidential. Consistent with Rule 25-22.006, Florida Administrative Code, this request is being filed to specify the portions of the testimony for which confidential classification is being sought by FPL.

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

- a. Exhibit A consists of a copy of the pages of the testimony containing information which FPL asserts is confidential, and FPL has highlighted all information that FPL asserts is confidential.
- b. Exhibit B is a redacted version of the confidential documents in Exhibit A.
- c. Exhibit C is a table that identifies the information for which confidential treatment is being sought, 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.

5. 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.

6. As described more fully in the declaration included in Exhibit D, the Confidential Information contains information relating to FPL's competitive interests, the disclosure of which would impair the competitive business of FPL. Specifically, the information contains FPL budget forecast amounts for future solar projects and/or battery storage projects. This information is protected by Section 366.093(3)(e), Florida Statutes.

7. 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 17th day of June, 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 17th day of June, 2025:

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s/ Maria Jose Moncada

Maria Jose Moncada
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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

1 expenses, rate base assignments, and parity calculations.

2 Yet, despite proposing a completely new LLCS customer class with
3 significantly higher rates, FPL has not performed or submitted any such
4 parity or detailed cost analysis for LLCS customers. This inconsistency
5 raises concerns about whether the LLCS charges are based on sound cost
6 allocation principles grounded in cost causation were instead structured to
7 meet a targeted financial result.

8 **Q. IN RESPONSE TO DISCOVERY, FPL PROVIDED A**
9 **CONFIDENTIAL LARGE LOAD MODEL STYLED “2025 FPL**
10 **EDM LARGE LOAD – CONFIDENTIAL.XLSX.” DOES THIS**
11 **MODEL CONSTITUTE A COST-OF-SERVICE STUDY?**

12 A. No. FPL’s confidential model is not a comprehensive cost-of-service study.
13 Instead, it functions as a revenue requirement model designed to estimate
14 the return needed on proposed battery storage investments. Importantly, it
15 does not account for the revenue or system-wide benefits associated with
16 those batteries, both of which are essential to proper resource planning
17 assessment and an understanding of the net impacts on FPL and its
18 customers.

19 **Q. DO YOU HAVE CONCERNS REGARDING THE DESIGN AND**
20 **COST ALLOCATION IN FPL’S CONFIDENTIAL MODEL?**

21 A. Yes. In reviewing FPL’s Confidential Large Load Model, it appears that
22 based upon our calculations that FPL proposes to deploy 6.1 GW of 2-hour
23 battery energy storage systems (BESS) to serve 3.0 GW of data center load
24 at [REDACTED] to support data center growth. This plan raises concerns

1 the impact of using more accurate annual revenue projections. This
2 omission further undermines the credibility and reasonableness of the
3 proposed IGC. Likewise, FPL has not submitted any technical or economic
4 rationale to support its decision to base revenue requirements on a 2:1
5 battery-to-load ratio, which significantly inflates the capital cost
6 assumptions and further distorts the total cost to be recovered.

7 **IV. ANALYSIS OF OVER-RECOVERY IN FPL'S IGC MODEL**

8 **Q. BASED ON THE ABOVE, IS FPL'S PROPOSED IGC SUPPORTED**
9 **BY THE INFORMATION PROVIDED IN ITS REVENUE**
10 **REQUIREMENT MODEL?**

11 A. No. FPL's proposed IGC is materially overstated based on the financial
12 modeling information provided by FPL itself. As I mentioned, the proposed
13 IGC of \$28.07/kW-month (4.52 cents/kWh at an 85% Load Factor [LF]) is
14 calculated using FPL's peak-year revenue requirement rather than a
15 levelized approach that reflects cost behavior over time.

16 **Q. WHAT IS THE FINANCIAL IMPACT OF FPL USING THE PEAK-**
17 **YEAR REVENUE REQUIREMENT INSTEAD OF A LEVELIZED**
18 **APPROACH?**

19 A. FPL's projections indicate a total capital investment (CapEx) of
20 approximately [REDACTED], including [REDACTED] for battery storage,
21 [REDACTED] for transmission infrastructure, and nearly [REDACTED] in fixed
22 operation and maintenance (O&M) costs. These figures support the
23 development and operation of 6.1 GW of capacity to serve an expected 3
24 GW of contracted LLCS load over a 20-year period.

1 **Q. WHAT IS THE FINANCIAL IMPACT OF FPL'S OVER-**
2 **SPECIFICATION OF BATTERY CAPACITY RELATIVE TO THE**
3 **ACTUAL LOAD IT NEEDS TO SERVE?**

4 A. FPL's proposed 6.1 GW buildout—double the 3 GW contracted load —
5 greatly inflates infrastructure costs and FPL's stated revenue requirement.

6 When scaled to a 3 GW buildout:

- 7 ▪ Battery storage costs fall from [REDACTED] to [REDACTED]
- 8 ▪ Transmission costs decline from [REDACTED] to [REDACTED]
- 9 ▪ Fixed O&M drops from [REDACTED] to [REDACTED]

10 If FPL scales its infrastructure to the available 3 GW in the LLCS-1
11 territory, total capital investment drops from [REDACTED] to [REDACTED].

12 FPL's model shows this adjustment results in the following:

- 13 ▪ The total nominal revenue requirement falls from \$12.87 billion to
14 \$6.36 billion,
- 15 ▪ The discounted revenue requirement drops from \$6.51 billion to
16 \$3.27 billion (using 8.81% WACC).

17 Under this correction alone, the IGC would drop significantly—reflecting
18 **nearly** a 50% reduction in customer cost obligations—driven by a
19 proportional reduction in FPL's capital investment. Even at this lower IGC,
20 FPL would still fully recover its revenue requirement, including a regulated
21 return on equity.

22 **Q. WHAT IS THE COMBINED FINANCIAL IMPACT WHEN BOTH**
23 **THE PEAK-YEAR REVENUE ASSUMPTION AND CAPACITY**
24 **OVER-SPECIFICATION ARE CORRECTED?**

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: June 17, 2025

Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Page/Line	F.S. 366.093 (3) Sub-section	Declarant
N/A	N/A	FEIA Witness Dr. Mohamed Ahmed Direct Testimony	3	Y	Page 15, Line 24 (as marked); Page 22, Lines 20-21 (as marked); Page 24, Lines 7-9 and 11 (as marked).	(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 the testimony of FEIA Witness, Dr. Mohamed Ahmed. The documents or materials that I have reviewed and which are proprietary confidential business information contain information relating to FPL's competitive interests, the disclosure of which would impair the competitive business of FPL. Specifically, the information contains FPL budget forecast amounts for future solar projects and/or battery storage projects. 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: 06/16/2025