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July 22, 2025

VIA HAND DELIVERY

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

REDACTED

COMMISSION
CLERK

2025 JUL 22 PM 4:35

RECEIVED-FPS

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 response to Staff's Twentieth Set of Interrogatories (No. 393). 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 that 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)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20250011-EI

Date: July 22, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSE TO
THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S
TWENTIETH SET OF INTERROGATORIES (No. 393)**

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 Staff of the Florida Public Service Commission's ("Staff") Twentieth Set of Interrogatories (No. 393) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its response to Staff's Twentieth Set of Interrogatories (No. 393) on July 22, 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 document. For the documents in Exhibit A that are confidential in their entirety, Exhibit B consists of an insert page.
- 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 Thomas Broad 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 proprietary confidential business information, which contains information relating to competitive interests, the disclosure of which impair the competitive business of FPL. Specifically, the information contains projections of capital expenditures for specific projects, which if made public would negatively affect FPL's competitive business interests to the detriment of its customers. 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 22nd day of July, 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 22nd day of July, 2025:

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**Americans for Affordable Clean Energy,
Inc., Circle K Stores, Inc., RaceTrac, Inc.
and Wawa, Inc.**

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 Staff's
Twentieth Set of Interrogatories No. 393,
Bates Nos.
058487-058536, 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: July 22, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
Staff 20 th INT, 393	058529	058535	Attachemnt 1 - GE Tech 2.0 Upgrade Summary - FPL Finance Deck (10-5-2020) FINAL.pdf	7	Y	All	(e)	Thomas Broad
Staff 20 th INT, 393	058536	058536	Attachment 2 - PWC KAI Upgrades - Final CPVRR Summary-Jan2018.pdf	1	Y	All	(e)	Thomas Broad
Staff 20 th INT, 393	058498	058510	Attachemnt 3 - West County G1+Kai Upgrades.xlsm	13	Y	All	(e)	Thomas Broad
Staff 20 th INT, 393	058528	058528	Attachment 4 – 3SAR + STG Upgrades Pro Forma Summary.pdf	1	Y	All	(e)	Thomas Broad
Staff 20 th INT, 393	058487	058497	Attachment 5 – 2020 GE Fleet Tech 2.0 Upgrades.xlsm	11	Y	All	(e)	Thomas Broad
Staff 20 th INT, 393	058511	058527	Attachment 6 - DLN 2.6 + 3SAR.xlsx	17	Y	All	(e)	Thomas Broad

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 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 Staff's Twentieth Set of Interrogatories, No. 393. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to competitive interests, the disclosure of which impair the competitive business of FPL. Specifically, the information contains projections of capital expenditures for specific projects, which if made public would negatively affect FPL's competitive business interests to the detriment of its customers. 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: 7/22/25