



**REDACTED**

**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 28, 2025

**VIA HAND DELIVERY**

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

**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 Supplemental Response to the Office of Public Counsel's ("OPC") First Request for Production of Documents (No. 27). 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)

RECEIVED-FPSC  
2025 MAY 28 PM 1:40  
COMMISSION  
CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No: 20250011-EI

Date: May 28, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN ITS SUPPLEMENTAL  
RESPONSE TO THE OFFICE OF PUBLIC COUNSEL'S FIRST REQUEST  
FOR PRODUCTION OF DOCUMENTS (NO. 27)**

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 Supplemental Response to the Office of Public Counsel's ("OPC") First Request for Production of Documents (No. 27) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its Supplemental Response to OPC's First Request for Production of Documents (No. 27) on May 28, 2025. Consistent with Rule 25-22.006, Florida Administrative Code, this request is being filed contemporaneously with the service of that supplemental response 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 declarant who supports the requested classification.

- d. Exhibit D consists of the declaration of Keith Ferguson 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 concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. Specifically, the information contains service charges billed to affiliates, which if publicly disclosed could be used to determine negotiated pricing paid by FPL. This information is protected by Section 366.093(3)(d), 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 28th 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 28th day of May, 2025:

Shaw Stiller  
Timothy Sparks  
**Florida Public Service Commission**  
Office of the General Counsel  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
sstiller@psc.state.fl.us  
tsparks@psc.state.fl.us  
discovery-gcl@psc.state.fl.us

Leslie R. Newton  
Ashley N. George  
Thomas Jernigan  
Michael A. Rivera  
James B. Ely  
Ebony M. Payton  
139 Barnes Drive, Suite 1  
Tyndall AFB FL 32403  
leslie.newton.1@us.af.mil  
ashley.george.4@us.af.mil  
thomas.jernigan.3@us.af.mil  
michael.rivera.51@us.af.mil  
james.ely@us.af.mil  
ebony.payton.ctr@us.af.mil  
**Federal Executive Agencies**

William C. Garner  
3425 Bannerman Road  
Tallahassee FL 32312  
bgarner@wcglawoffice.com  
**Southern Alliance for Clean Energy**

Jon C. Moyle, Jr.  
Karen A. Putnal  
c/o Moyle Law Firm  
118 North Gadsden Street  
Tallahassee FL 32301  
jmoyle@moylelaw.com  
mqualls@moylelaw.com  
kputnal@moylelaw.com  
**Florida Industrial Power Users Group**

Walt Trierweiler  
Mary A. Wessling  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison St., Rm 812  
Tallahassee, Florida 32399-1400  
trierweiler.walt@leg.state.fl.us  
Wessling.Mary@leg.state.fl.us  
**Attorneys for the Citizens  
of the State of Florida**

Bradley Marshall  
Jordan Luebke  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee FL 32301  
bmarshall@earthjustice.org  
jluebke@earthjustice.org  
flcaseupdates@earthjustice.org  
**Florida Rising, Inc., Environmental  
Confederation of Southwest Florida, Inc.,  
League of United Latin American Citizens  
of Florida**

Danielle McManamon  
4500 Biscayne Blvd. Suite 201  
Miami, Florida 33137  
dmcmamanon@earthjustice.org  
**League of United Latin American Citizens  
of Florida**

Nikhil Vijaykar  
Keyes & Fox LLP  
580 California Street, 12th Floor  
San Francisco, CA 94104  
nvijaykar@keyesfox.com  
**EVgo Services, LLC**

Katelyn Lee, Senior Associate  
Lindsey Stegall, Senior Manager  
1661 E. Franklin Ave.  
El Segundo, CA 90245  
Katelyn.Lee@evgo.com  
Lindsey.Stegall@evgo.com  
**EVgo Services, LLC**

Stephen Bright  
Jigar J. Shah  
1950 Opportunity Way, Suite 1500  
Reston, Virginia 20190  
steve.bright@electrifyamerica.com  
jigar.shah@electrifyamerica.com  
**Electrify America, LLC**

Robert E. Montejo  
Duane Morris LLP  
201 S. Biscayne Blvd., Suite 3400  
Miami, Florida 33131-4325  
REMontejo@duanemorris.com  
**Electrify America, LLC**

Stephanie U. Eaton  
Spilman Thomas & Battle, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
seaton@spilmanlaw.com  
**Walmart, Inc.**

Steven W. Lee  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
slee@spilmanlaw.com  
**Walmart, Inc.**

Jay Brew  
Laura Wynn Baker  
Joseph R. Briscar  
Sarah B. Newman  
1025 Thomas Jefferson Street NW  
Suite 800 West  
Washington, DC 20007  
jbrew@smxblaw.com  
lwb@smxblaw.com  
jrb@smxblaw.com  
sbn@smxblaw.com  
**Florida Retail Federation**

D. Bruce May  
Kevin W. Cox  
Kathryn Isted  
Holland & Knight LLP  
315 South Calhoun St, Suite 600  
Tallahassee, Florida 32301  
bruce.may@hklaw.com  
kevin.cox@hklaw.com  
kathryn.isted@hklaw.com  
**Florida Energy for Innovation Association**

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 document responsive to OPC's First Request  
for Production of Documents No. 27  
Supplemental, Bates No. 045436, is confidential  
in its entirety.



The document responsive to OPC's First Request  
for Production of Documents No. 27  
Supplemental, Bates No. 045436, is confidential  
in its 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 27, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093(3) Subsection	Declarant
OPC's 1 <sup>st</sup> POD, No. 27 Supplemental	045436	045436	FPL Corporate Service Charges Billed to Affiliates January – March 2025	1	Y	All	(d)	Keith Ferguson

**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

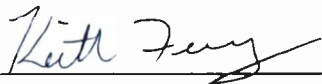
**DECLARATION OF KEITH FERGUSON**

1. My name is Keith Ferguson. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Accounting and Controller. 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 Supplemental Response to OPC's First Request for Production of Documents, No. 27. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. Specifically, the information contains service charges billed to affiliates, which if publicly disclosed could be used to determine negotiated pricing paid by FPL. 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.

  
\_\_\_\_\_  
Keith Ferguson

Date: May 25, 2025