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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

COMMISSION
CLERK

2025 JUN 17 PM 2:20

RECEIVED-FPSC

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 Exhibit JRD-9 to the Testimony of the Office of Public Counsel Witness James R. Dauphinais. 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 pages that are confidential in their entirety, FPL is only including an insert 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)

COM

AFD

APA

ECO

ENG

GCL

IDM

CLK

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: June 17, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION CONTAINED IN
EXHIBIT JRD-9 TO THE TESTIMONY OF THE OFFICE OF
PUBLIC COUNSEL WITNESS JAMES R. DAUPHINAIS**

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 Exhibit JRD-9 to the testimony of the Office of Public Counsel ("OPC") witness James R. Dauphinais. 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 and exhibits of OPC Witness James R. Dauphinais ("FPL's Notice of Intent").

2. On June 9, 2025, OPC filed the testimony and exhibits of witness James R. Dauphinais as confidential under seal pursuant to FPL's Notice of Intent.

3. After reviewing the testimony and exhibits of OPC witness James R. Dauphinais, FPL has identified portions of Exhibit JRD-9 to the testimony that are confidential (the "Confidential Information"). The Confidential Information was information that was provided by FPL to OPC 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. For those pages that are confidential in their entirety, FPL is only including an insert page in Exhibit B.
- 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 budget

forecast amounts for future solar and battery projects, as well as a planning and strategy overview of the 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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Florida Retail Federation

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	<u> X </u>
Public Version(s) of the Document(s) attached via USB	<u> </u>

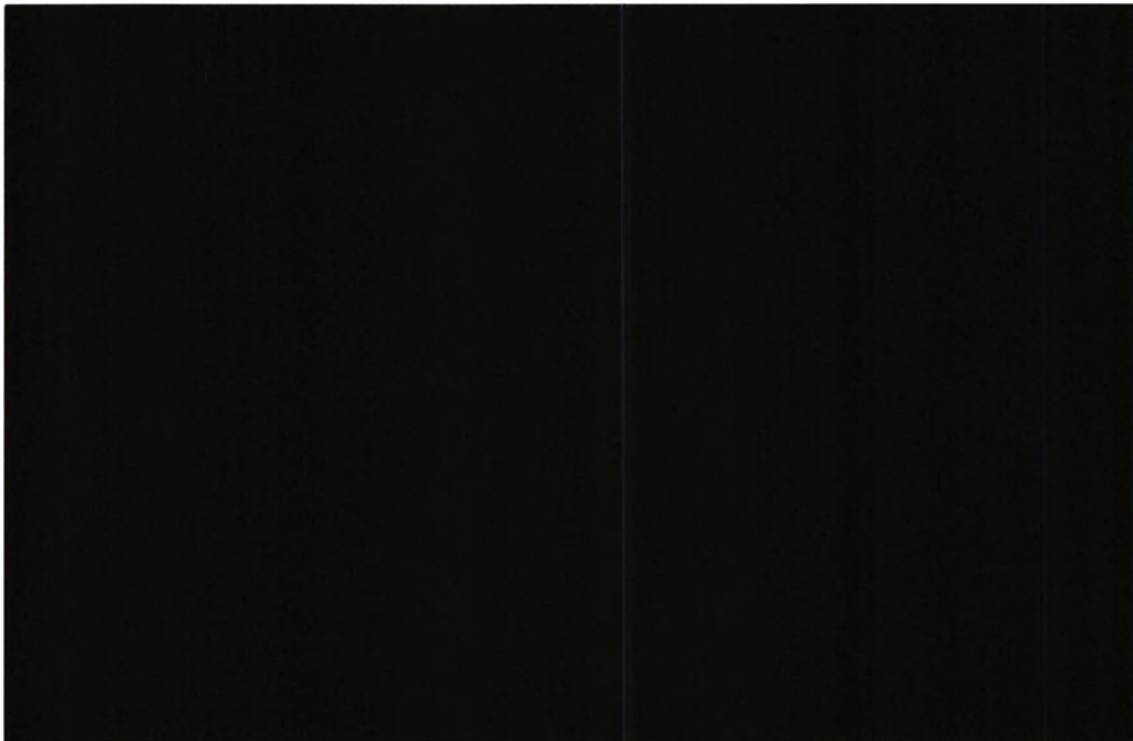
4. Budget and Timeline

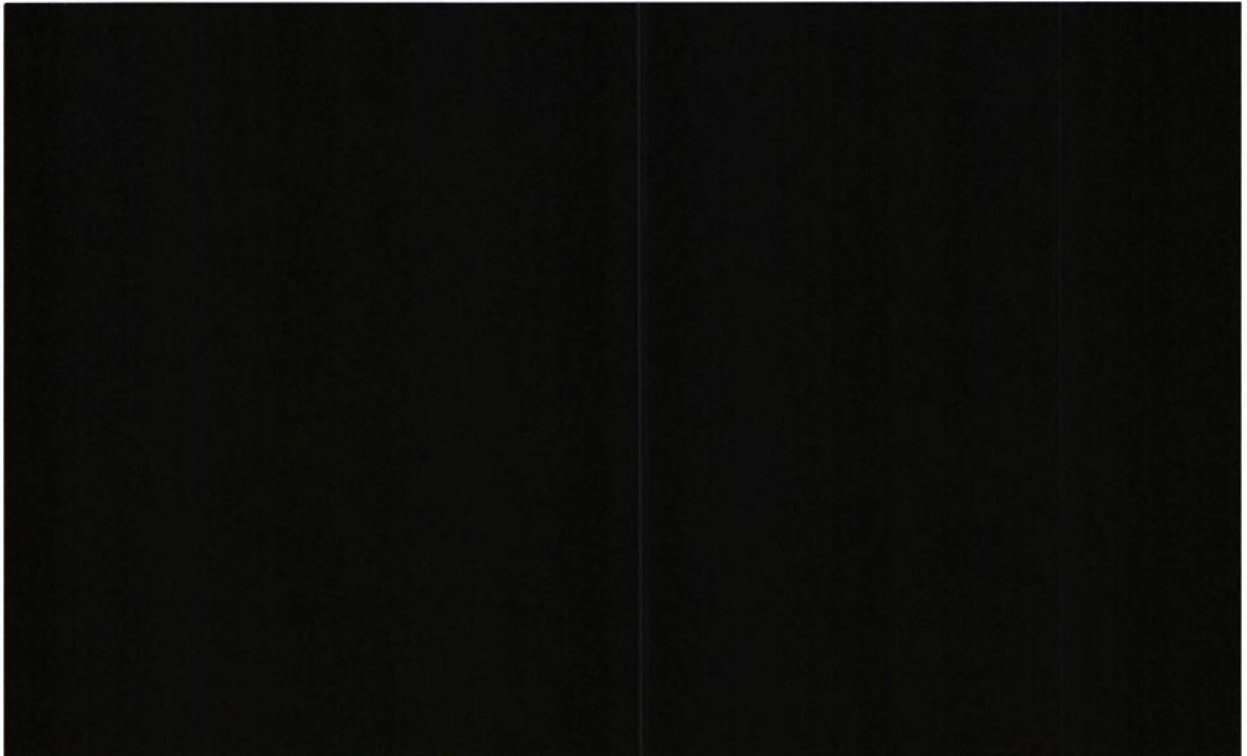
E3 proposes to complete the tasks described above on a time-and-materials basis subject to a not-to-exceed budget ceiling as indicated. Any additional out-of-pocket expenses such as travel costs would be passed through at cost with no markup.

Task	Timeline	Budget
Track 6: Rate Case Filing Testimony Support – March Filing	3/1/2025	
Ongoing Rate Case Filing Testimony Support	12/31/2025	
Track 7: Additional Planning and Operational Studies	6/30/2025	
<i>RESERVE updates</i>	4/30/2025	
<i>RECAP updates</i>	5/31/2025	
<i>PLEXOS updates</i>	6/30/2025	
Track 8: Resource Planning Model Development and Capability Building	12/31/2025	
Model licenses		
Total Budget (USD)		

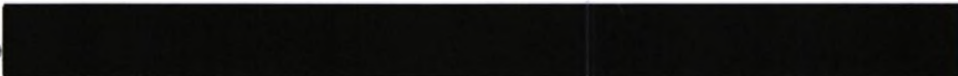


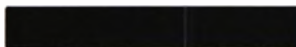
[REDACTED]



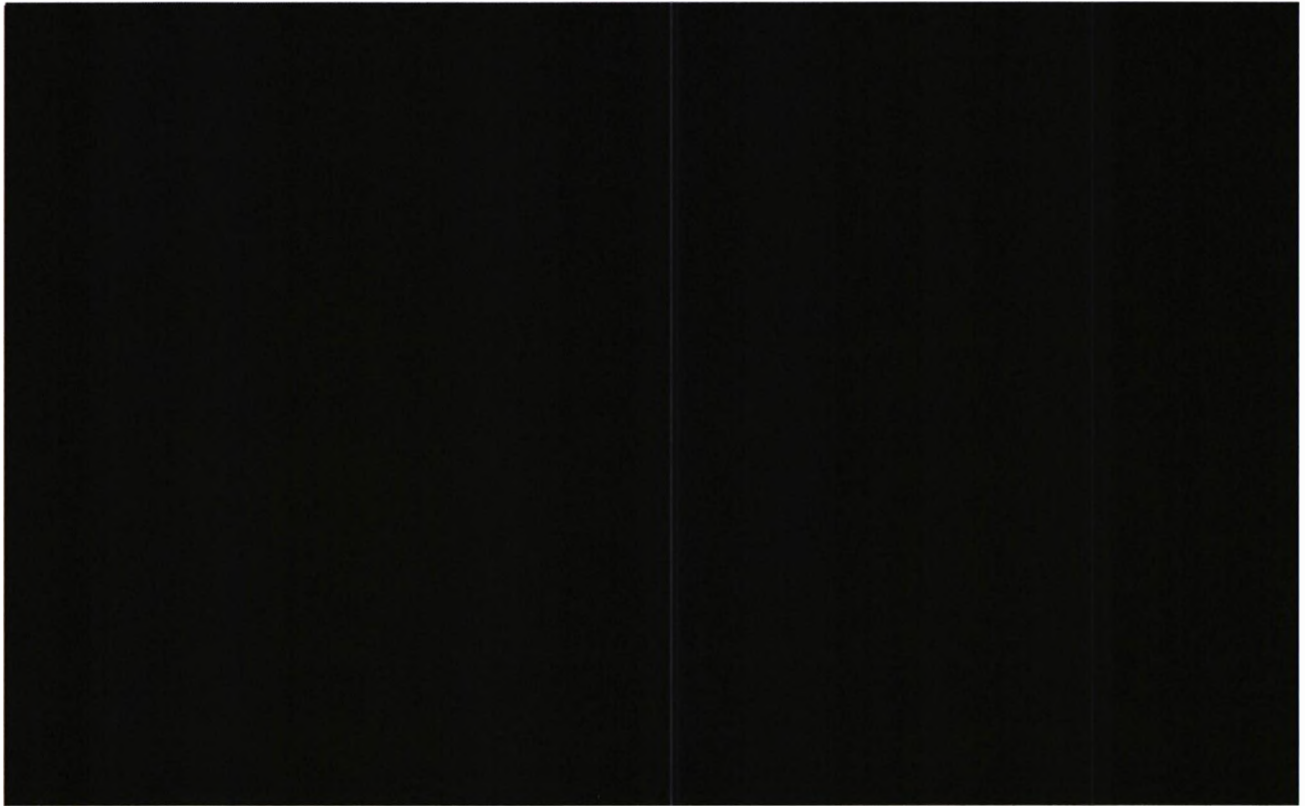








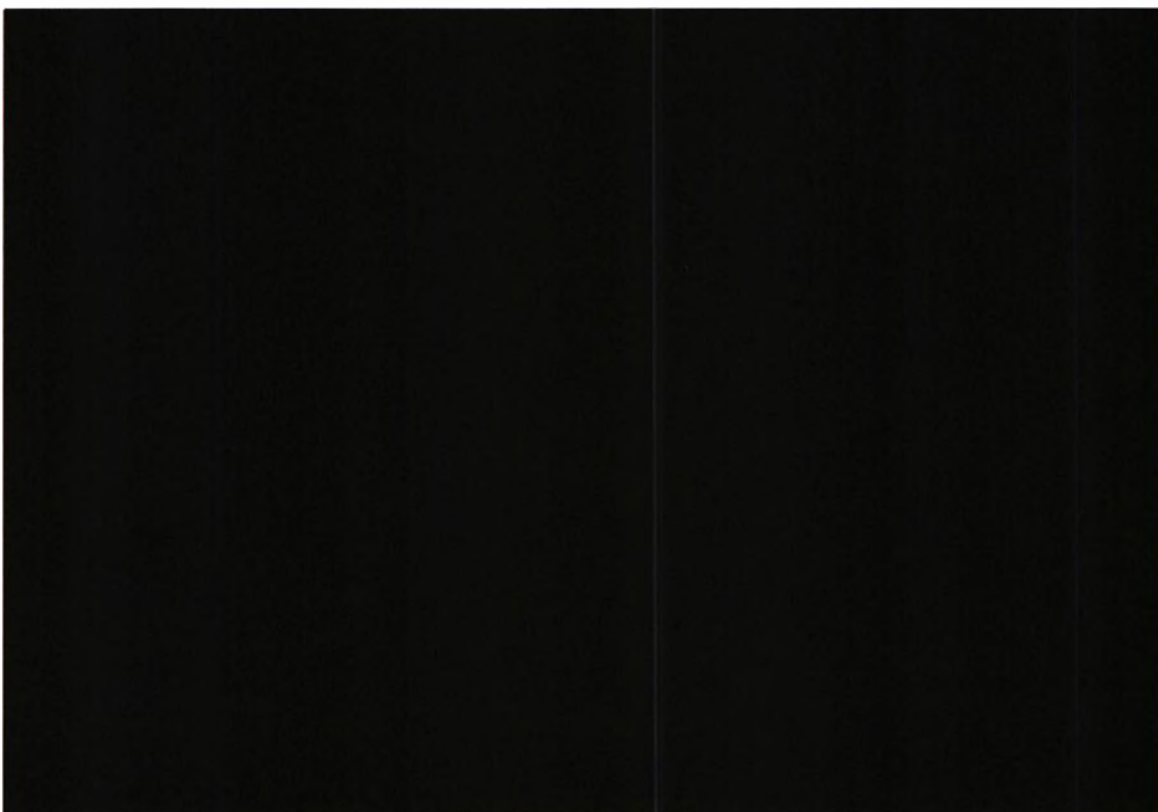


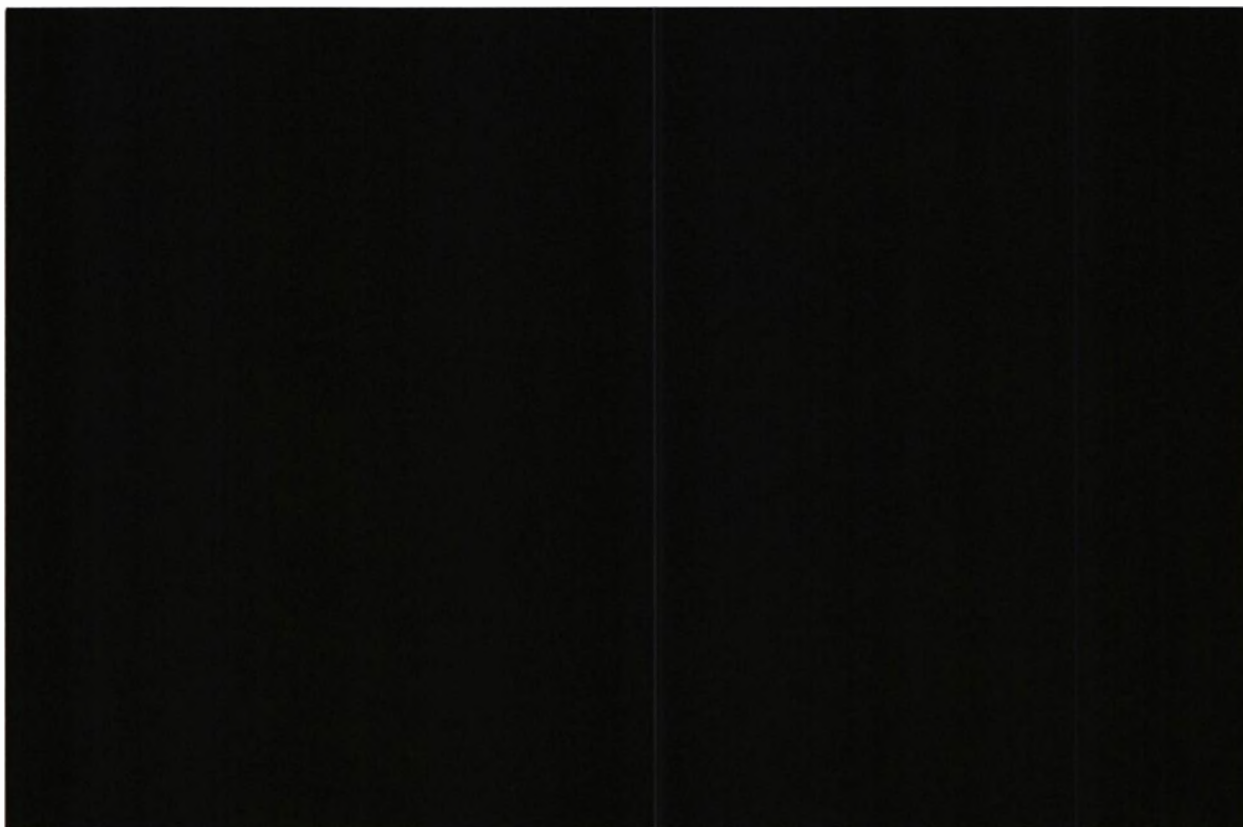


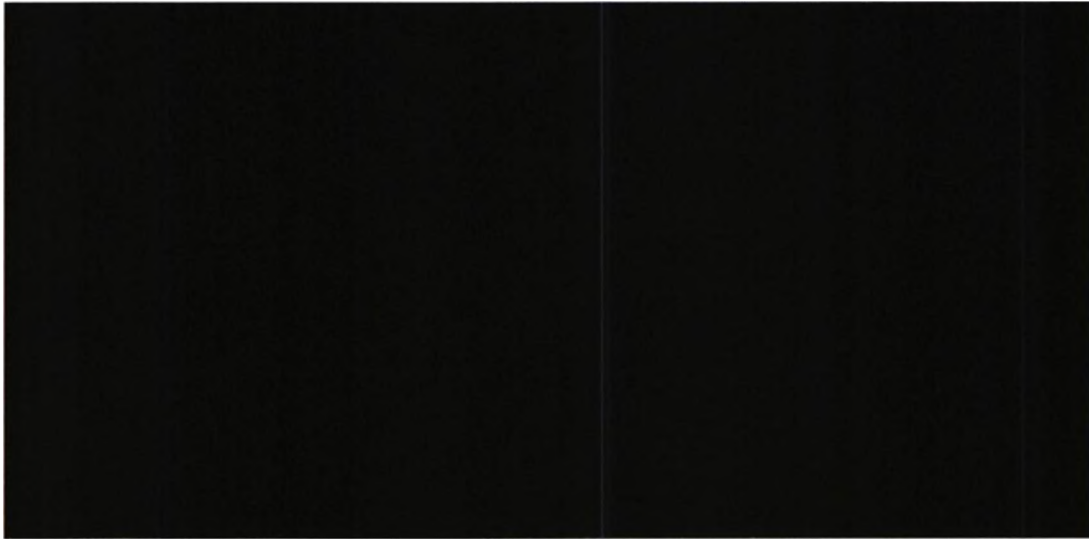












Northwest Florida Battery Storage Executive Summary

FPL is seeking the approval of the Board of Directors to develop, construct and operate seven energy storage sites in Northwest Florida (NWFL) collectively known as NWFL Battery Storage. The project consists of ~520 MW of 3-hour batteries located at operating FPL solar plants with an expected commercial operations date (COD) of December 1, 2025. The total capital expenditure is expected to be [REDACTED]

The sites are in Calhoun, Okaloosa and Santa Rosa counties in Florida. 100% of the land required was previously secured for existing solar plants. All pre-construction permitting is expected to be completed by August 2024. The new batteries will interconnect into the FPL transmission system via existing solar substations.

Under normal winter (P50 load) conditions there are sufficient reserves in NWFL but, factoring in potential forced outages or peak winter load, shortfalls may occur starting in 2025.

The proposed project addresses the NWFL reliability need and provides additional firm capacity to the FPL system. The FPL Ten-Year Site Plan (TYSP) shows 520 MW of battery storage placed in service beginning in December 2025.

A key risk for the project is potential permitting delays, interconnection studies and long lead material deliveries that would result in FPL securing PPAs to ensure winter reserve margin adequacy in lieu of the NWFL Battery Storage Project.

Battery Storage will enhance reliability in NWFL and mitigate capacity shortfall under severe winter conditions

Project Overview

- **NWFL Battery Storage consists of seven 74.5 MW, 3-hour duration battery storage sites added onto existing solar sites in Northwest Florida**
- **Sites selected by considering:**
 - Sites with sufficient remaining space to accommodate battery storage
 - Existing solar substations with surplus interconnection capacity to mitigate interconnection queue study risk and transformer lead times
- **Expected COD: December 1, 2025**
- **Project qualifies for 30% ITC, but no ITC kickers**
- 1 • [REDACTED]
- 2 • [REDACTED]
 - GE Flex 1571 inverters will be contracted by end of June 2024
 - Bidding for EPC contractor occurring in summer 2024
- 3 • **Total capital cost** [REDACTED]

^A
^B
^C
1 **Battery procurement is long-lead schedule item and NEE
has secured sufficient capacity from [REDACTED]**

Procurement Opportunity Summary

- 2 • **1.7 GWh of batteries contracted at [REDACTED]**
- 3 – Batteries priced at current cost curve
- 3 – [REDACTED]
- 4 • **Battery storage system includes all major components (cells, modules, rack assembly, control panel, management system)**
- 4 – All components manufactured in [REDACTED]
- **Equipment delivery to project sites aligned with Engineering and Construction timeline**
- Batteries will arrive in U.S. several months in advance and stored off-site prior to final delivery to project sites
- **Aligned with FPL's strategy to diversify battery storage supply chain by moving away from Chinese suppliers**

This battery procurement supports proposed 2025 NWFL Battery project and materials can be reallocated to other locations if necessary

FPL is engaged with local and state officials to expedite permitting, and has a process to accelerate construction and commissioning schedules if needed

A

B

Mitigants: Potential Schedule Delays

- Teams are working with relevant authorities to obtain outstanding permits in timely manner
 - Florida Department of Environmental Protection expeditiously reviewing permit modifications; county permits on-track for August 2024 approval
- Early coordination with Power Delivery team on surplus interconnection indicates that negative impacts are unlikely
 - To be confirmed in July-August via formal request and study process
- 1 • [REDACTED] batteries were secured in January 2024 and ISC is closely coordinating with supplier on delivery timeline
 - Inverters will be contracted by June 2024 to meet construction schedule
 - Evaluating storage locations to support early deliveries to further mitigate schedule risk
- If the development / procurement process delays start of construction beyond October 2024, EPC acceleration payments can recover commissioning schedule
 - 2 – 6-week mobilization delay would require [REDACTED] in acceleration payments to recover schedule

1 [REDACTED]

NWFL Battery Storage – Preliminary Cost Estimate

	Category	Cost (\$ MM)	\$/kWh	Criteria	Design Assumption
2	Battery Materials	[REDACTED]	[REDACTED]	COD	12/1/2025
3	Balance of Plant			Year-1 MWh	1,564.5
4	Development			Cycles / Year	20
5	Land & Easements				
6	Transmission				
7	AFUDC				
8	Total				

- Major material pricing has been locked in
 - [REDACTED] battery order placed in April 2024
 - [REDACTED] inverters to be secured in June 2024
- Project is eligible to earn AFUDC, similar to grouping of FPL solar sites

11 1) Assumes \$0.5 MM for each separate site development leverages existing site work and studies
 Proprietary & Confidential

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
040771	040771	OPC Witness James R. Dauphinais Direct Testimony – Exhibit JRD-9	1	Y	Page 39, Lines 1-9, Col. A	(e)	Andrew Whitley
043174	043212	OPC Witness James R. Dauphinais Direct Testimony – Exhibit JRD-9	14	Y	Pages 44-57, All	(e)	Andrew Whitley
032094	032094	OPC Witness James R. Dauphinais Direct Testimony – Exhibit JRD-9	1	Y	Page 60, Line 1, Col. A	(e)	Andrew Whitley
032098	032098	OPC Witness James R. Dauphinais Direct Testimony – Exhibit JRD-9	1	Y	Page 64, Lines 1-2, Col. A and Line 3, Cols. A-B	(e)	Andrew Whitley
032099	032099	OPC Witness James R. Dauphinais Direct Testimony – Exhibit JRD-9	1	Y	Page 65, Lines 1-2, Col. C, Line 3, Col. A, and Line 4, Col. B	(e)	Andrew Whitley
032102	032102	OPC Witness James R. Dauphinais Direct Testimony – Exhibit JRD-9	1	Y	Page 68, Line 1, Col. A, and Line 2, Col. B	(e)	Andrew Whitley
032104	032104	OPC Witness James R. Dauphinais Direct Testimony – Exhibit JRD-9	1	Y	Page 70, Line 1, Cols. A-C, Lines 2-8, Cols. B and C, Lines 9-10, Col. A.	(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 and exhibits of OPC witness James R. Dauphinais. 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 budget forecast amounts for future solar and battery projects, as well as a planning and strategy overview of the 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