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

June 19, 2025



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 the Staff of the Florida Public Service Commission's Twelfth Request for Production of Documents (No. 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.

COM AFD APA ECO ENG Enclosure GCI IDM -cc: CLK

Sincerely,

<u>s/ Maria Jose Moncada</u> 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 19, 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 TWELFTH REQUEST FOR PRODUCTION OF DOCUMENTS (No. 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 Response to the Staff of the Florida Public Service Commission's ("Staff") Twelfth Request for Production of Documents (No. 60) ("Confidential Information"). In support of its request, FPL states as follows:

- 1. FPL served its Responses to Staff's Twelfth Request for Production of Documents (No. 60) on June 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. As the document in Exhibit A is confidential in its entirety, Exhibit B is an isnert page.
 - 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.

 Exhibit D consists of the declaration of Manuel Acosta 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 information relating to FPL's competitive interests, the disclosure of which would impair the competitive business of FPL. Specifically, the information contains proprietary forecasts of fuel prices and gas capacity availability, which if made public could impact fuel or capacity prices paid by FPL 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 19th day of June, 2025,

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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 <u>19th</u> day of June, 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**

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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 Luebkemann 111 S. Martin Luther King Jr. Blvd. Tallahassee FL 32301 bmarshall@earthjustice.org jluebkemann@earthjustice.org flcaseupdates@earthjustice.org Florida Rising, Inc., Environmental Confederation of Southwest Florida, Inc., League of United Latin American Citizens of Florida

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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

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

The document responsive to Staff's Twelfth Request for Production of Documents No. 60, Bates Nos. 052789-052793, is confidential in its entirety.

EXHIBIT C

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JUSTIFICATION TABLE

EXHIBIT C

COMPANY:	Florida Power & Light Company
TITLE:	Petition by Florida Power & Light Company for Base Rate
DOCKET NO.: DATE:	Increase 20250011-EI June 19, 2025

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Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confid- ential	Line/Col	F.S. 366.093(3) Subsection	Declarant
Staff 12 th POD, 60	052789	052793	FPL 2025-2100 Long Term Forecast Methodology	5	Y	All	(e)	Manuel Acosta

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

Docket No: 20250011-EI

DECLARATION OF MANUEL ACOSTA

1. My name is Manuel Acosta. I am currently employed by Florida Power & Light Company ("FPL") as Senior Physical Trading Manager, Energy Marketing and Trading. 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 FPL's response to the Staff of the Florida Public Service Commission's Twelfth Request for Production of Documents, No. 60. 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 impari the competitive business of FPL. Specifically, the information contains proprietary forecasts of fuel prices and gas capacity availability. 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 Adminstrative 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.

Manuel Acosta