



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 20, 2025

VIA HAND DELIVERY

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

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CLERK
2025 JUN 20 PM 2:13

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 Materials Provided Pursuant to Audit Control No. 2025-062-1-1. 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) 2 Redacted USBs
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

Enclosure

cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

Sincerely,

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20250011-EI

Date: June 20, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN MATERIALS PROVIDED PURSUANT TO
AUDIT CONTROL NO. 2025-062-1-1**

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 materials provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 2025-062-1-1 ("the Audit"). In support of its request, FPL states as follows:

1. During the Audit, FPL provided Staff with various confidential documents. By letter dated June 2, 2025, Staff indicated its intent to retain certain confidential documents provided by FPL to Staff as audit work papers. Pursuant to Rule 25-22.006(3)(a), FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the work papers. Accordingly, FPL files this Request for Confidential Classification to maintain continued confidential handling of the certain confidential materials contained in Staff's work papers associated with the Audit.

2. 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 Audit workpapers 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 Kieth 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 contains pricing information or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. Specifically, the materials contain amounts paid for insurance premiums and payments for claims. Some of the documents or materials also contain or constitute information relating to competitive interests of FPL, the disclosure of which would impair FPL's competitive business. Specifically, the material consists of budget projections and banking information. This information is protected by Sections 366.093(3)(d) and (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 20th day of June, 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 20th 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

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
dmcmanamon@earthjustice.org
**League of United Latin American Citizens
of Florida**

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

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

Robert Scheffel Wright
John T. LaVia, III
Gardner, Bist, Bowden, Dee, LaVia, Wright,
Perry & Harper, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com
Floridians Against Increased Rates, Inc.

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

Floyd R. Self
Ruth Vafek
Berger Singerman, LLP
313 North Monroe Street
Suite 301
Tallahassee, Florida 32301
fself@bergersingerman.com
rvafek@bergersingerman.com
**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 _____

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

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
AUDIT NO.: ACN2025-062-1-1
DATE: June 20, 2025

Staff DR No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
ACN2025-062-1-1 DR23	022884	022884	Affiliate Transactions – Work Paper No. 44	1	N			
ACN2025-062-1-1 DR23	022885	022885	Affiliate Transactions – Work Paper No. 44.1	1	Y	Lines 1-32 / Cols. A & B	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022886	022886	Affiliate Transactions – Work Paper No. 44.2	1	Y	Lines 1-12 / Col. A	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022887	022887	Affiliate Transactions – Work Paper No. 44.3	1	Y	Lines 1-2 / Col. A	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022888	022888	Affiliate Transactions – Work Paper No. 44.4	1	Y	Lines 1-8 / Col. A	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022889	022889	Affiliate Transactions – Work Paper No. 44.5	1	Y	Lines 1-6 / Col. A; Lines 7-9 / Col. B; Lines 1,3,5/ Col. C	(d)	Keith Ferguson

Staff DR No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
ACN2025-062-1-1 DR23	022890	022890	Affiliate Transactions – Work Paper No. 44.6	1	Y	Lines 1-18/ Col. A; Lines 19-36/ Col. B	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022891	022891	Affiliate Transactions – Work Paper No. 44.7	1	N			
ACN2025-062-1-1 DR23	022892	022892	Affiliate Transactions – Work Paper No. 44.8	1	Y	Lines 1-4/ Cols. A & B	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022893	022893	Affiliate Transactions – Work Paper No. 44.9	1	Y	Lines 1-4/ Cols. A - D	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022894	022894	Affiliate Transactions – Work Paper No. 44.10	1	Y	Lines 1-8/ Col. A; Lines 2-5 and 9- 12/ Col. B;	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022895	022895	Affiliate Transactions – Work Paper No. 44.11	1	Y	Lines 1 and 3-7 / Col. C; Line 2/ Cols. A,C,D; Lines 8 / Cols. A, C	(d)	Keith Ferguson

Staff DR No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
ACN2025-062-1-1 DR23	022896	022896	Affiliate Transactions – Work Paper No. 44.12	1	Y	Line 1/ Cols. D, E; Line 2/ Col. E; Line 3/ Col. B; Line 4/ Cols. D,F,G; Line 5/ Col. A; Lines 6-7/ Col. C; Line 8/ Col. D	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022897	022897	Affiliate Transactions – Work Paper No. 44.13	1	Y	Lines 1 and 4-6/ Col. C; Line 2/ Cols. C, D; Line 3/ Cols. A,C; Line 7/ Col. B	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022898	022898	Affiliate Transactions – Work Paper No. 44.14	1	Y	Line 1/ Cols. D,E,F; Line 2/ Col. B; Lines 3-4/ Col. C; Line 5/ Col. A; Line 6/ Col. D	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022899	022899	Affiliate Transactions – Work Paper No. 44.15	1	Y	Lines 1-13/ Col. A	(d)	Keith Ferguson
ACN2025-062-1-1 DR23	022900	022900	Affiliate Transactions – Work Paper No. 44.16	1	Y	Lines 1-11/ Col. A	(d)	Keith Ferguson

Staff DR No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
ACN2025-062-1-1 DR6	022901	022901	Affiliate Transactions – Work Paper No. 45	1	N			
ACN2025-062-1-1 DR6	022902	022902	Affiliate Transactions – Work Paper No. 45-2.1	1	Y	Lines 1-33/ Cols. A-G	(e)	Keith Ferguson
ACN2025-062-1-1 DR6	022903	022903	Affiliate Transactions – Work Paper No. 45-2.2	1	Y	Lines 1-34/ Cols. A-G	(e)	Keith Ferguson
ACN2025-062-1-1 DR6	022904	2022904	Affiliate Transactions – Work Paper No. 45-2.3	1	Y	Lines 1-19/ Cols. A-G; Lines 20-33/ Cols. E-G	(e)	Keith Ferguson
ACN2025-062-1-1 DR6	022905	022905	Affiliate Transactions – Work Paper No. 45-2.4	1	Y	Lines 1-33 / Cols. A-C	(e)	Keith Ferguson
ACN2025-062-1-1 DR6	022906	022906	Affiliate Transactions – Work Paper No. 45-2.5	1	Y	Lines 1-17/ Cols. A-G; Lines 18-33/ Cols. E-G	(e)	Keith Ferguson
ACN2025-062-1-1 DR6	022907	022907	Affiliate Transactions – Work Paper No. 45-2.6	1	N			
ACN2025-062-1-1 DR6	022908	022908	Affiliate Transactions – Work Paper No. 45-2.7	1	N			
ACN2025-062-1-1 DR6	022909	022909	Affiliate Transactions – Work Paper No. 45-2.8	1	N			
ACN2025-062-1-1 DR6	022910	022910	Affiliate Transactions – Work Paper No. 45-2.9	1	Y	Line 1/ Cols. A- B	(e)	Keith Ferguson
ACN2025-062-1-1 DR6	022911	022911	Affiliate Transactions – Work Paper No. 45-2.10	1	N			
ACN2025-062-1-1 DR6	022912	022912	Affiliate Transactions – Work Paper No. 45-2.11	1	N			

Staff DR No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
ACN2025-062-1-1 DR6	022913	022913	Affiliate Transactions – Work Paper No. 45-2.12	1	N			
ACN2025-062-1-1 DR6	022914	022914	Affiliate Transactions – Work Paper No. 45-2.13	1	N			
ACN2025-062-1-1 DR6	022915	022915	Affiliate Transactions – Work Paper No. 45-2.14	1	Y	Line 1/ Cols A- C	(e)	Keith Ferguson
ACN2025-062-1-1 DR6	022916	022916	Affiliate Transactions – Work Paper No. 45-2.15	1	N			
ACN2025-062-1-1 DR6	022917	022917	Affiliate Transactions – Work Paper No. 45-2.16	1	N			
ACN2025-062-1-1 DR6	022918	022918	Affiliate Transactions – Work Paper No. 45-2.17	1	N			
ACN2025-062-1-1 DR6	022919	022919	Affiliate Transactions – Work Paper No. 45-2.18	1	N			
ACN2025-062-1-1 DR23	022920	022920	Affiliate Transactions – Work Paper No. 60	1	N			
ACN2025-062-1-1 DR23	022921	022921	Affiliate Transactions – Work Paper No. 60.1	1	N			
ACN2025-062-1-1 DR23	022922	022922	Affiliate Transactions – Work Paper No. 60.2	1	Y	Lines 1-2/ Col. A	(e)	Keith Ferguson
ACN2025-062-1-1 DR23	022923	022923	Affiliate Transactions – Work Paper No. 60.3	1	N			
ACN2025-062-1-1 DR23	022924	022924	Affiliate Transactions – Work Paper No. 60.4	1	N			
ACN2025-062-1-1 DR23	022925	022925	Affiliate Transactions – Work Paper No. 60.5	1	Y	Lines 1-2/ Col. A	(e)	Keith Ferguson
ACN2025-062-1-1 DR23	022926	022926	Affiliate Transactions – Work Paper No. 60.6	1	N			

Staff DR No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
ACN2025-062-1-1 DR23	022927	022927	Affiliate Transactions – Work Paper No. 60.7	1	N			
ACN2025-062-1-1 DR23	022928	022928	Affiliate Transactions – Work Paper No. 60.8	1	Y	Lines 1-2/ Col. A	(e)	Keith Ferguson

EXHIBIT D
DECLARATION(S)

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20250011-EI,
Audit Control Number 2025-062-1-1

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 that are included in FPL's Request for Confidential Classification regarding the Rate Case Audit Work Papers Item No. 1, pages 44 to 44-9; Item No. 2, pages 45 to 45-2.19; and Item No. 3, pages 60 to 60.8, for which I am listed as the declarant on Exhibit C. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. Specifically, the materials contain amounts paid for insurance premiums and payments for claims. Some of the documents or materials also contain or constitute information relating to competitive interests of FPL, the disclosure of which would impair FPL's competitive business. Specifically, the material consists of budget projections and banking information. 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: June 19, 2025