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June 25, 2025

VIA HAND DELIVERY

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

REDACTED

CLERK

265 JW 25 PH 1: 24

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 responses to Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's Tenth Request for Production of Documents (No. 82). 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.

AFD 1 redace	Find. Sincerely,
ECO	s/ Maria Jose Moncada
ENG	Maria Jose Moncada Fla. Bar No. 0773301
GCL Enclo	sure
IDMcc:	Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)
CLK CC.	Counsel for Lattics of Record (w. copy of 1112 s request for Confidential Classification)

CONA

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by Florida Power & Light Company for Base Rate Increase

Docket No. 20250011-EI

Date: June 25, 2025

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSE TO FLORIDA RISING, LEAGUE OF UNITED LATIN AMERICAN CITIZENS AND ENVIRONMENTAL CONFEDERATION OF SOUTHWEST FLORIDA'S TENTH REQUEST FOR PRODUCTION OF **DOCUMENTS (No. 82)**

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 Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's ("FL Rising") Tenth Request for Production of Documents (No. 82) ("Confidential Information"). In support of its request, FPL states as follows:

- FPL served its responses to FL Rising's Tenth Request for Production of 1. Documents (No. 82) on June 25, 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:
 - Exhibit A consists of a copy of the confidential documents on which all a. information that FPL asserts is confidential has been highlighted.
 - b. Exhibit B is a redacted version of the confidential documents. As the documents included in Exhibit A are confidential in their entirety, Exhibit B consists of insert pages.

- 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 Eduardo De Varona 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 information related to FPL transmission project planning and operations, including studies, impact analysis, procedures and terms of agreements. 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 25th 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

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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 25th day of June, 2025:

Shaw Stiller Timothy Sparks

Florida Public Service Commission

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

The documents responsive to FEL's Tenth Request for Production of Documents No. 82, Bates Nos. 052816-053146, are confidential in their entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY:

Florida Power & Light Company Petition by Florida Power & Light Company for Base Rate TITLE:

Increase

DOCKET NO.: 20250011-EI June 25, 2025 **DATE:**

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confid- ential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FEL 10 th POD, No. 82	052882	052998	Name Redacted System Impact Study Report 052325 REDACTED.pdf	117	Y	All	(e)	Eduardo Devarona
FEL 10 th POD, No. 82	052999	053025	Name Redacted-2 LLCS Construction and Operating Agreement Redacted.pd	27	Y	All	(e)	Eduardo Devarona
FEL 10 th POD, No. 82	053026	053146	Name Redacted-2 System Impact Study 05232025_Redacted.pdf	121	Y	All	(e)	Eduardo Devarona
FEL 10 th POD, No. 82	052816	052849	COM-1 FPL Communications procedure v13.0 - Final .pdf	34	Y	All	(e)	Eduardo Devarona
FEL 10 th POD, No. 82	052850	052854	large load - process milestones.pdf	5	Y	All	(e)	Eduardo Devarona
FEL 10 th POD, No. 82	052855	052881	Name Redacted LLCS Construction and Operating Agreement 05232025_Redacted.pdf	27	Y	All	(e)	Eduardo Devarona

EXHIBIT D DECLARATION(S)

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company

Docket No: 20250011-EI

for Base Rate Increase

DECLARATION OF EDUARDO DE VARONA

- 1. My name is Eduardo De Varona. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Power Delivery. 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 response to the Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's Tenth Request for Production of Documents, No. 82. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to FPL's competitive interests, the disclosure of which impair the competitive business of FPL. Specifically, the information contains information related to FPL transmission project planning and operations. 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.

	Eduardo De Varona	
Date:	06/25/2025	