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July 11, 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 JUL 11 PM 12:49

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 Information contained in its supplemental response to FL Rising's Thirteenth Request for Production of Documents (No. 93). 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 declarations 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)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20250011-EI

Date: July 11, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST  
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION  
PROVIDED IN ITS SUPPLEMENTAL RESPONSE TO FLORIDA  
RISING, LEAGUE OF UNITED LATIN AMERICAN CITIZENS AND  
ENVIRONMENTAL CONFEDERATION OF SOUTHWEST FLORIDA'S  
THIRTEENTH REQUEST FOR PRODUCTION OF DOCUMENTS (No. 93)**

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 Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's ("FL Rising") Thirteenth Request for Production of Documents (No. 93) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its supplemental response to FL Rising's Thirteenth Request for Production of Documents (No. 93) on July 11, 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 documents included in Exhibit A are confidential in its 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 declarants who supports the requested classification.
- d. Exhibit D consists of the declarations of Jessica Buttress and James Coyne 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 declarations included in Exhibit D, the Confidential Information contains information relating to competitive interests, the disclosure of which impair the competitive business of the provider of the information. Specifically, the information is data that is proprietary to third-party vendors who provided it to either FPL or Concentric Energy Advisors, Inc. 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 11th day of July, 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 11th day of July, 2025:

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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   X  

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



The documents for Witness Coyne responsive to FEL's Thirteenth Request for Production of Documents No. 93, Bates Nos. 053166-053200 and 053203-053240, are confidential in its entirety.

The documents for Witness Buttress  
responsive to FEL's Thirteenth Request for  
Production of Documents No. 93, Bates Nos.  
053241-053244, are  
confidential in their 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:** July 11, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FEL 13 <sup>th</sup> POD, 93	053209	053209	WP_Citation 43_S&P500 utilities CAGR (Confidential).xlsx	1	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053210	053211	WP_Exh. JMC-18 - Capital Structure (Confidential).xlsx	2	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053212	053216	WP_Exh. JMC-19 - Weather Analysis (Confidential).xlsx	5	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053222	053230	WP_Figure 2 - CAPM Support (Confidential).xlsx	9	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053231	053231	WP_Figure 3_30yT, Util yields dec 24-jun25 (Confidential).xlsx	1	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053232	053233	WP_Figure 5, 6 - SPX Total Return vs. Utilities (Confidential).xlsx	2	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053234	053239	WP_Figure 8 - Utility CapEx (Confidential).xlsx	6	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053240	053240	WP_Figure 9 - Kroll Equity Risk Premium (Confidential).xlsx	1	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053217	053220	WP_Figure 10 - Mr. Walters' MRP (Confidential).xlsx	4	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053221	053221	WP_Figure 11 - Total Returns of S&P 500 Index (Confidential).xlsx	1	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053166	053184	Blue Chip FF June 2025 (Confidential).pdf	19	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053185	053200	Value Line Reports (Confidential).pdf	16	Y	All	(e)	James Coyne

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FEL 13 <sup>th</sup> POD, 93	053203	053203	WP Citations 39,53,66_Rate Case History (Confidential).xlsx	1	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053204	053207	WP Exh. JMC-16_Risk Premium Analysis 05-30-2025 (Confidential).xlsx	4	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053208	053208	WP_Citation 14_Auth ROEs VI, nuclear (confidential).xlsx	1	Y	All	(e)	James Coyne
FEL 13 <sup>th</sup> POD, 93	053241	053242	8-Aon STI Energy Report October 2024	2	Y	All	(e)	Jessica Buttress
FEL 13 <sup>th</sup> POD, 93	053243	053244	9-Aon STI Global Report October 2024	2	Y	All	(e)	Jessica Buttress

**EXHIBIT D**  
**DECLARATION(S)**

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No: 20250011-EI


**DECLARATION OF JAMES COYNE**

1. My name is James Coyne. I am employed by Concentric Energy Advisors, Inc. as a Senior Vice President. 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 response to FEL's Thirteenth Request for Production of Documents No. 93. The documents or materials that I have reviewed and which are proprietary confidential business information contain information relating to competitive interests, the disclosure of which impair the competitive business of the provider of the information. Specifically, the information is data that is proprietary to third party vendors who provided it to Concentric pursuant to a subscription agreement. To the best of my knowledge, Concentric Energy Advisors, Inc. and 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.



James Coyne

Date: July 10, 2025

**EXHIBIT D**

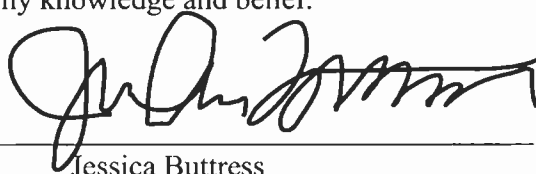
**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No: 20250011-EI

**DECLARATION OF JESSICA BUTTRESS**

1. My name is Jessica Buttress. I am employed by Florida Power & Light Company . as a Senior Director, Executive Services and Compensation. 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 response to FL Rising's Thirteenth Request for Production of Documents No. 93. The documents or materials that I have reviewed and which are proprietary confidential business information contain information relating to competitive interests, the disclosure of which impair the competitive business of the provider of the information. Specifically, the information is data that is proprietary to a third party vendor who provided it to 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.

  
\_\_\_\_\_  
Jessica Buttress

Date: 7/10/25