



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

July 11, 2025

VIA HAND DELIVERY

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

REDACTED

RECEIVED-FPSC
2025 JUL 11 PM 4:00
COMMISSION
CLERK

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) for FPL Rebuttal Witness Andrew Whitley. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the document(s) 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.

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) FOR FPL REBUTTAL WITNESS ANDREW WHITLEY**

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) for FPL Rebuttal Witness Andrew Whitley ("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 declarant who supports the requested classification.
- d. Exhibit D consists of the declarations of Andrew Whitley 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 of FPL, the disclosure of which impair FPL's competitive business. Specifically, the information contains strategic planning documents proprietary to FPL. In addition, the Confidential Information contains information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the documents contain

negotiated capacity and energy prices. 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 11th day of July, 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 11th day of July, 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
mqalls@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 Luebkekmann
111 S. Martin Luther King Jr. Blvd.
Tallahassee FL 32301
bmarshall@earthjustice.org
jluebkekmann@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

Robert E. Montejo
Duane Morris, LLP
201 S. Biscayne Blvd., Suite 3400
Miami, FL 33131-4325
remontejo@duanemorris.com
Armstrong World Industries, Inc.

Alexander W. Judd
Duane Morris, LLP
100 Pearl Street, 13th Floor
Hartford, CT 06103
ajudd@duanemorris.com
Armstrong World Industries, Inc.

Brian A. Ardire
Armstrong World Industries, Inc.
2500 Columbia Avenue
Lancaster, PA 17603
baardire@armstrongceilings.com

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

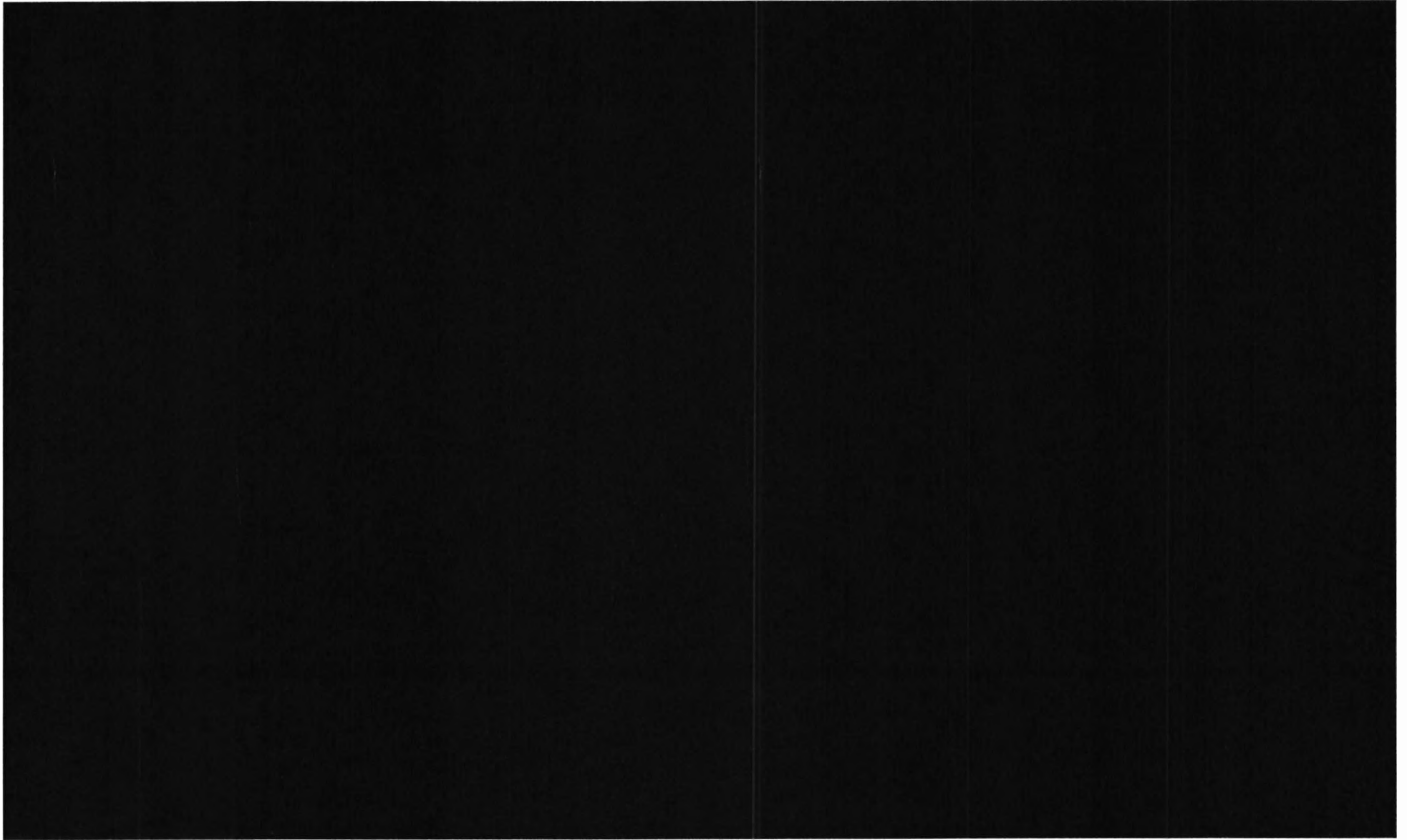
EXHIBIT B

PUBLIC VERSION OF THE DOCUMENTS

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

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

FPL 055207
20250011-EI



The document for Witness Whitley
responsive to FEL's Thirteenth Request for
Production of Documents No. 93
Supplemental, Bates Nos. 055208-055208,
is confidential in its 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 th POD, 93	055208	055208	Senate bill incentives chart	1	Y	All	(e)	Andrew Whitley
FEL 13 th POD, 93	055207	055207	NW Winter Reserves Calculation	1	Y	All	(d)	Andrew Whitley

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

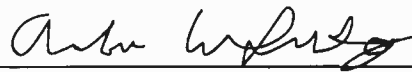
DECLARATION OF ANDREW WHITLEY

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 FPL's Supplemental 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 concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the documents contain negotiated capacity and energy prices. The documents also contain competitive business information the disclosure of which would impair the competitive business of FPL. Specifically, the information contains strategic planning documents. 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: 07/11/2025