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July 15, 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 15 PM 3:21

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 third supplemental response to FL Rising's Thirteenth Request for Production of Documents (No. 93) for FPL Rebuttal Witness Tiffany Cohen. 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 that 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

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: July 15, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN ITS THIRD  
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 THE WORKPAPERS OF FPL REBUTTAL  
WITNESS TIFFANY COHEN**

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 third 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 the Workpapers of FPL Rebuttal Witness Tiffany Cohen ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its third supplemental response to FL Rising's Thirteenth Request for Production of Documents (No. 93) on July 15, 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. For those documents included in Exhibit A that 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 Tiffany Cohen 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 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 information contains a Memorandum of Understanding used between FPL and certain large commercial customers. The materials also contain information relating to FPL's competitive interests, the disclosure of which impair the competitive business of FPL. Specifically, the

information contains proprietary data pertaining to projected tax impacts on revenue requirements. 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 15th 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 15th 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 \_\_\_\_\_

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



The document for Witness Cohen  
responsive to FEL's Thirteenth Request for  
Production of Documents No. 93 Third  
Supplemental, Bates Nos. 057843-057902,  
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 15, 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	057843	057902	Memorandum of Understanding	60	Y	All	(d)	Tiffany Cohen
FEL 13 <sup>th</sup> POD, 93	057833	057834	2025 FPL EDM Data Center 2028-2033	2	N			
FEL 13 <sup>th</sup> POD, 93	057835	057835	2025 FPL EDM Data Center 2028-2033	1	Y	Line 34, Cols. A-AG	(e)	Tiffany Cohen
FEL 13 <sup>th</sup> POD, 93	057836	057836	2025 FPL EDM Data Center 2028-2033	1	Y	Lines 46, 52-54, and 56-58; Cols. I-AH	(e)	Tiffany Cohen
FEL 13 <sup>th</sup> POD, 93	057837	057837	2025 FPL EDM Data Center 2028-2033	1	Y	Lines 16-39, as marked; Lines 183-211 as marked	(e)	Tiffany Cohen
FEL 13 <sup>th</sup> POD, 93	057838	057838	2025 FPL EDM Data Center 2028-2033	1	Y	As marked	(e)	Tiffany Cohen
FEL 13 <sup>th</sup> POD, 93	057839	057842	2025 FPL EDM Data Center 2028-2033	4	N			

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

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition by Florida Power & Light Company for  
Base Rate Increase

Docket No: 20250011-EI

**DECLARATION OF TIFFANY COHEN**

1. My name is Tiffany Cohen. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Financial Planning and Rate Strategy. 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 third 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 asserted by FPL to be 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 information contains a Memorandum of Understanding used between FPL and certain large commercial customers. The materials also contain information relating to FPL's competitive interests, the disclosure of which impair the competitive business of FPL. Specifically, the information contains proprietary data pertaining to projected tax impacts on revenue requirements. 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.

*Tiffany Cohen*

\_\_\_\_\_  
Tiffany Cohen

Date: 07/15/2025