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 18, 2025



Dear Mr. Teitzman:

VIA HAND DELIVERY Mr. Adam Teitzman **Commission Clerk** 

2540 Shumard Oak Blvd.

Re:

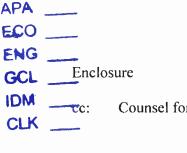
I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information contained in its response to OPC's Twentieth Request for Production of Documents (No. 145). The request includes Exhibits A, B (two copies), C and D.

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.

Sincerely,

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



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



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#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light Company for Base Rate Increase Docket No. 20250011-EI

Date: July 18, 2025

### FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSE TO THE OFFICE OF PUBLIC COUNSEL'S TWENTIETH REQUEST FOR PRODUCTION OF DOCUMENTS (No. 145)

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 the Office of Public Counsel's ("OPC") Twentieth Request for Production of Documents (No. 145) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its responses to OPC's Twentieth Request for Production of Documents (No. 145) on July 18, 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 document on which all information that FPL asserts is confidential has been highlighted.
  - b. Exhibit B is a redacted version of the confidential document. As the document in Exhibit A is confidential in its entirety, Exhibit B consists of an insert page.
  - 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.

 Exhibit D consists of the declaration of Johana Molina-Parks 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 proprietary confidential business information, which concerns 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 pricing ad terms for insurance contracts. This information is protected by Section 366.093(3)(d), 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.

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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 18th day of July, 2025,

By: <u>s/Maria Jose Moncada</u>

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 18th 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 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 Luebkemann 111 S. Martin Luther King Jr. Blvd. Tallahassee FL 32301 bmarshall@earthjustice.org jluebkemann@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 Yonatan Moskowitz Keyes & Fox LLP 580 California Street, 12th Floor San Francisco, CA 94104 nvijaykar@keyesfox.com ymoskowitz@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 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.

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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**

 The document responsive to OPC's Twentieth Request for Production of Documents, No. 145, Bates No. FPL 058438 - 058442, 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					
DOCKET NO.: DATE:	Increase 20250011-EI July 18, 2025					

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confid- ential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 20 <sup>th</sup> POD, No. 145	058438	058442	2024 Wildfire Pricing Expectations	5	Y	All	(d)	Johana Molina- Parks

# 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 JOHANA MOLINA-PARKS**

1. My name is Johana Molina-Parks. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Risk Management. 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 response to OPC's Twentieth Request for Production of Documents, No. 145. 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 pricing for insurance contracts. 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 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 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.

Johana Molina-Parks Johana Molina-Parks

Date: 7 18 25