

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20250011-EI

Served: July 18, 2025

**FLORIDA POWER & LIGHT COMPANY'S OBJECTIONS
AND RESPONSES TO THE OFFICE OF PUBLIC COUNSEL'S
TWENTIETH SET OF INTERROGATORIES (Nos. 364-382) AND
TWENTIETH REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 145-158)**

Florida Power & Light Company ("FPL") hereby serves the following Objections and Responses to the Office of Public Counsel's ("OPC") Twentieth Set of Interrogatories (Nos. 364-382) and Twentieth Request for Production of Documents (Nos. 145-158).

I. General Objections

1. FPL objects to each and every discovery request that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time the response is first made or is later determined to be applicable for any reason. FPL in no way intends to waive any such privilege or protection. The nature of the documents, if any, will be described in a privilege log prepared and provided by FPL.

2. In certain circumstances, FPL may determine, upon investigation and analysis, that information or documents responsive to certain discovery requests to which objections are not otherwise asserted is confidential and proprietary and should be produced only with provisions in place to protect the confidentiality of the information. By agreeing to provide such information or documents in response to such request, FPL is not waiving its right to insist upon appropriate protection of confidentiality by means of a protective order, a request for confidential classification, a Notice of Intent, and any other process as provided for by Florida Statutes and Commission Rules, or other action to protect the confidential information or documents requested.

FPL asserts its right to require such protection of any and all information and documents that may qualify for protection under the Florida Rules of Civil Procedure, Florida Statutes, and other applicable statutes, rules and legal principles.

3. FPL objects to each discovery request to the extent that it seeks information that is duplicative, not relevant to the subject matter of this docket, and is not reasonably calculated to lead to the discovery of admissible evidence.

4. FPL objects to each and every discovery request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests. Any responses provided by FPL will be provided subject to, and without waiver of, the foregoing objection.

5. FPL objects to each and every discovery request to the extent it calls for FPL to prepare information in a particular format or perform calculations or analyses not previously prepared or performed as unduly burdensome and purporting to expand FPL's obligations under applicable law.

6. FPL objects to each and every discovery request to the extent it calls for FPL to conduct legal research or provide a legal conclusion or analysis.

7. FPL objects to providing information to the extent that such information is already in the public record before a public agency and available through normal procedures or is readily accessible through legal search engines.

8. FPL objects to each and every discovery request to the extent it calls for production of documents and/or disclosure of information that is below-the-line or otherwise unrelated to FPL's base rates or cost of service to its customers. Such documents and/or information are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

9. FPL objects to each and every discovery request that calls for the production of documents and/or disclosure of information from NextEra Energy, Inc. (“NEE”) and any other subsidiaries and/or affiliates of NEE that do not deal with transactions or cost allocations between FPL and either NEE or any subsidiaries and/or affiliates. Such documents and/or information do not affect FPL’s rates or cost of service to FPL’s customers. Therefore, those documents and/or information are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, FPL is the party appearing before the Florida Public Service Commission in this docket. To require any other entities to participate in irrelevant discovery is by its very nature unduly burdensome and overbroad. Subject to, and without waiving, any other objections, FPL will respond to the extent the request pertains to FPL and FPL’s rates or cost of service charged to FPL’s customers. To the extent any responsive documents contain irrelevant affiliate information as well as information related to FPL and FPL’s rates or cost of service charged to its customers, FPL may redact the irrelevant affiliate information from the responsive documents.

10. FPL objects to each and every discovery request to the extent it calls for production of documents and/or disclosure of information for a time period that is prior to January 1, 2021, or later than December 31, 2029. To the extent such documents or information do not relate to any issues impacting FPL base rates, cost of service to its customers, or any other matter at issue in this docket, then they are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

11. Where any discovery request calls for production of documents, FPL objects to any production location other than at FPL’s Tallahassee Office located at 134 W. Jefferson Street, Tallahassee, Florida, unless otherwise agreed by the parties.

12. FPL objects to each and every discovery request and any instructions that purport to expand FPL's obligations under applicable law.

13. In addition, FPL reserves its right to count discovery requests and their sub-parts, as permitted under the applicable rules of procedure, in determining whether it is obligated to respond to additional requests served by any party.

14. FPL expressly reserves and does not waive any and all objections it may have to the admissibility, authenticity, or relevance of the information provided in its responses.

II. Specific Objections

FPL incorporates by reference all of the foregoing General Objections into its Specific Objections as though fully stated herein.

15. FPL specifically objects to all OPC Interrogatories propounded after OPC has reached the limit of 900 Interrogatories, counting subparts, set by the Pre-hearing Officer in Order No. PSC-2025-0255-PCO-EI on July 9, 2025 ("July 9 Order"). As of the OPC's Sixteenth Set of Interrogatories, OPC has crossed the 900 interrogatory limit, including subparts, when counting all distinct questions embedded within their interrogatories. However, when employing the methodology apparently employed by OPC to count interrogatory subparts, OPC has not yet reached the limit established in the July 9 Order. Without waiving this or other objections or agreeing to the methodology apparently relied upon by OPC, FPL is responding to the interrogatories contained in OPC's Twentieth Set of Interrogatories.

16. Interrogatory No. 366: FPL objects to Interrogatory No. 366 to the extent it requests FPL to provide information about specified lawsuits "over the last 25 years." To the extent the interrogatory is seeking information prior to January 1, 2021, it is requesting information that does not relate to any issues impacting FPL base rates, cost of service to its customers, or any

other matter at issue in this docket, then they are irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to this objection, FPL will respond to the question as it relates to information after January 1, 2021.

III. Responses

17. FPL has provided electronic access, as agreed by the parties, to its non-confidential responses to OPC's Twentieth Set of Interrogatories (Nos. 364-382) and Twentieth Request for Production of Documents (Nos. 145-158), consistent with the general and specific objections herein.

Respectfully submitted this 18th day of July, 2025,

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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 18th day of July 2025:

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