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September 25, 2025

**REDACTED**

2025 SEP 25 PM 12:26

**VIA HAND DELIVERY**

Mr. Adam Teitzman  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**Re: Docket No. 20250001-EI**  
**Florida Power & Light Company Request for Confidential Classification**

Dear Mr. Teitzman:

Enclosed for filing in the above docket is Florida Power & Light Company's ("FPL") Request for Confidential Classification of certain information provided in its responses to Southern Alliance for Clean Energy's First Request for Production of Documents, Nos. 8 and 10. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents with all the information that FPL asserts is entitled to confidential treatment highlighted in yellow, and as they are voluminous, they are being provided in electronic format. Exhibit B is copy of the documents in Exhibit A with all the confidential information redacted. For those documents in Exhibit A that are confidential in their entirety, FPL is only providing an insert page. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains a declaration in support of FPL's request.

Please contact me if you or your Staff have any questions regarding this filing.

Sincerely,

s/ David M. Lee  
David M. Lee

COM  
AFD 1 Exh "B" redacted

APA  
ECO  
ENG  
GCL  
IDM  
CLK

Enclosures

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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and purchase power cost recovery  
clause with generating performance incentive  
factor

Docket No. 20250001-EI

Date: September 25, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO THE  
SOUTHERN ALLIANCE FOR CLEAN ENERGY'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS (NOS. 8 AND 10)**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its Request for Confidential Classification of certain information provided in response to the Southern Alliance for Clean Energy's ("SACE") First Request for Production of Documents (Nos. 8 and 10) ("Confidential Information"). In support of its Request, FPL states as follows:

1. On September 8, 2025, SACE served its First Set of Interrogatories and First Request for Production of Documents on FPL
2. Contemporaneously with this filing, FPL served its responses to SACE's First Set of Interrogatories (Nos. 1-10) and First Request for Production of Documents (Nos. 1-11) on September 25, 2025. FPL's Responses to SACE's First Request for Production of Documents Nos. 8 and 10, contained information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.
3. This request is being filed contemporaneously with the service of the response to request confidential classification of the Confidential Documents consistent with Rule 25-22.006, Florida Administrative Code.
4. The following exhibits are attached to and made a part of this Request:
  - a. Exhibit A consists of a copy of the confidential documents in which all the information that FPL asserts is entitled to confidential treatment is

highlighted in yellow. Voluminous responses are being provided in electronic format on an electronic storage device.

b. Exhibit B is an edited version of Exhibit A, in which all the information FPL asserts is entitled to confidential treatment has been redacted. For pages that are entirely confidential, insert pages are provided.

c. Exhibit C is a table that identifies the confidential information in Exhibit A and 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 of Michael Cashman in support of this Request.

5. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, 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.

6. As explained more fully in the declaration included in Exhibit D, the confidential documents provided by FPL in Exhibit A contain contractual data, including negotiated terms and pricing information. In addition, the confidential documents contain information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors to the detriment of FPL and its customers. Specifically, the confidential documents

include fuel price forecasts and agreements for the purchase of natural gas. The disclosure of this information would impair the efforts of FPL to contract for energy related goods or services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. This information is protected by Sections 366.093(3)(d) and (e), Fla. Stat.

7. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional 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* § 366.093(4), Fla. Stat.

**WHEREFORE**, for the above and foregoing reasons, as more fully set forth in the materials and declaration included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this 25th day of September, 2025,

By: *s/ David M. Lee*

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**CERTIFICATE OF SERVICE**

**Docket No. 20250001-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 25th day of September 2025 to the following:

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By: s/ David M. Lee  
David M. Lee  
Florida Bar No. 103152

\*Copies of Attachments C and D are available upon request.

## **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 responsive to SACE's First Request for Production of Documents, No. 8, Bates Nos. 000767-000885, are confidential in their entirety.



The documents responsive to SACE's First Request for Production of Documents, No. 10, Bates Nos. 000509-000759, are confidential in their entirety.

## **EXHIBIT C**

### **JUSTIFICATION TABLE**

# EXHIBIT C

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Documents  
**DOCKET NO.:** 20250001-EI  
**DOCKET TITLE:** Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor  
**SUBJECT:** FPL's Responses to SACE's First Set of Interrogatories (No. 7), and First Request for Production of Documents (Nos. 8 and 10)  
**DATE:** September 25, 2025

Set/No.	Bates Nos.	Description	No. of Pages	Line/Col.	Florida Statute 366.093(3) Subsection	Declarant
SACE 1 <sup>st</sup> POD, No. 8	FRC-25-000811-000823	Oil Forward Curve Upload	13	ALL	(d)(e)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 8	FRC-25-000879-000885	June 2025 Coal Forecast	7	ALL	(d)(e)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 8	FRC-25-000822-000878	V3 New Gas Forward Curve Upload	57	ALL	(d)(e)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 8	FRC-25-000767-000810	2025-2030 Spot Forward Curve Projection	44	ALL	(d)(e)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000586-000587	FGTG.pdf	2	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-000588-000590	FGTH.pdf	3	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000591-000597	GulfSouth 100A.pdf	6	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000598-000605	GulfSouth 100B.pdf	8	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000606-000607	GulfSouth 145C.pdf	2	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000608-000613	GulfSouth 3015A.pdf	6	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000614-000615	GulfSouth 3015B.pdf	2	ALL	(d)	Michael V. Cashman

Set/No.	Bates Nos.	Description	No. of Pages	Line/Col.	Florida Statute 366.093(3) Subsection	Declarant
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000616-000617	GulfSouth Destin 80A.pdf	2	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000618-000633	GulfSouth Destin 80B.pdf	16	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000634-000646	Gulfstream 345A.pdf	13	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000647-000659	Gulfstream 350B.pdf	13	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000660-000667	MEP Destin 75A.pdf	8	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000668-000682	MEP Destin 75B.pdf	15	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000683-000688	Sabal Trail FSCA.pdf	6	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000689-000698	Sabal Trail FSCB.pdf	10	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000699-000704	Sabal Trail FSCC.pdf	6	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000705-000709	SESH 45C.pdf	5	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000710-000719	SESH 80D.pdf	10	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000720-000729	SESH 100A.pdf	10	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000730-000739	SESH 100B.pdf	10	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000740-000741	Transco 21477C.pdf	2	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000742-000752	Transco 26429B.pdf	11	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000753-000754	Transco 121500A.pdf	2	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000755-000756	Trunkline.pdf	2	ALL	(d)	Michael V. Cashman

Set/No.	Bates Nos.	Description	No. of Pages	Line/Col.	Florida Statute 366.093(3) Subsection	Declarant
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000757-000759	Western Division 100B.pdf	3	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000509-000511	FGT Western Division 50C.pdf	3	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000512-000539	FGT Western Division 100A.pdf	28	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000540-000556	FGTA.pdf	17	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000557-000565	FGTB.pdf	9	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000566-000572	FGTC.pdf	7	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000573-000579	FGTD.pdf	7	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000580-000582	FGTE.pdf	3	ALL	(d)	Michael V. Cashman
SACE 1 <sup>st</sup> POD, No. 10	FCR-25-000503-000505	FGTF.pdf	3	ALL	(d)	Michael V. Cashman

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

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchase Power Cost Recovery  
Clause with Generating Performance Incentive  
Factor

Docket No. 20250001-EI

**DECLARATION OF MICHAEL V. CASHMAN**

1. My name is Michael V. Cashman. I am currently employed by Florida Power & Light Company ("FPL") as Executive Director, Wholesale Operations and Trading. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C, and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information contained in its Responses to SACE's First Request for Production of Documents, Nos. 8 and 10, for which I am designated as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain contractual data, including negotiated terms and pricing information. In addition, the confidential documents contain information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors to the detriment of FPL and its customers. Specifically, the confidential documents include fuel price forecasts and agreements for the purchase of natural gas. The disclosure of this information would impair the efforts of FPL to contract for energy related goods or services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. 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 least 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.

  
Michael V. Cashman

Date: 9/25/2025