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November 7, 2025

#### VIA HAND DELIVERY

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



COMMISSION

Re: Docket No. 20250011-EI

Dear Mr. Teitzman:

COM

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information contained in its Fourth Corrected Response to the Office of Public Counsel's First Request for Production of Documents (No. 15). The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of large and voluminous electronic data files that are confidential in their entirety. Exhibit A is submitted for filing in on an electronic storage device in an envelope marked "EXHIBIT A" – CONFIDENTIAL. As the documents in Exhibit A are confidential in their entirety, Exhibit B is an insert page. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D is 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.

AFD 1 redacted Exh "B"	Sincerely,
APA CENT B	s/ Maria Jose Moncada
ECO	Maria Jose Moncada
ENG	Fla. Bar No. 0773301
GCLEnclosure	
IDMcc: Counsel for	or 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

Company for Base Rate Increase

Date: November 7, 2025

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN ITS FOURTH CORRECTED RESPONSE TO THE OFFICE OF PUBLIC COUNSEL'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (No. 15)

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 Fourth Corrected Response to the Office of Public Counsel's ("OPC") First Request for Production of Documents (No. 15) (referred to as the "Confidential Information"). In support of its request, FPL states as follows:

- 1. July 17, 2025, FPL served its fourth corrected response to OPC's First Request for Production of Documents (No. 15) on the parties. Subject to a Notice of Intent filed simultaneously (Document No. 06529-2025), FPL served the confidential documents on the parties that same day. Consistent with Rule 25-22.006, Florida Administrative Code, this Request is being filed to request confidential classification of certain information contained in FPL's fourth corrected response to OPC's First Request for Production of Documents (No. 15).
  - 2. The following exhibits are attached to and made a part of this Request:
  - a. Exhibit A consists of large and voluminous electronic data files that are confidential in their entirety. An electronic copy of the confidential documents are being submitted for filing in on an electronic storage device in an envelope marked "EXHIBIT A" CONFIDENTIAL.

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- b. As the documents in Exhibit A are confidential in their entirety, Exhibit B is an insert page.
- c. Exhibit C is a table that identifies the information for which confidential treatment is being sought and references the specific statutory basis for the claim of confidentiality and identifies the declarant who support the requested classification.
- d. Exhibit D consists of the declaration of Remy Cain 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 in the declaration in Exhibit D, the Confidential Information includes proprietary confidential business information relating to the competitive interests of FPL or the provider of the information, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains integration studies and/or proposals prepared by a third-party vendor on behalf of FPL, and the confidential materials are proprietary to that vendor. This information is protected by Section 366.093(3)(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 7th day of November 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 <u>7th</u> day of November 2025:

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s/ Maria Jose Moncada

Maria Jose Moncada Assistant General Counsel Florida Bar No. 0773301

Attorney for Florida Power & Light Company

<sup>\*</sup> The exhibits to this Request are not included with the service copies, but copies of Exhibits B, 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 OPC's First Request for Production of Documents No. 15, Fourth Corrected Bates Nos. 059523-059686, are confidential in their entirety.

# EXHIBIT C JUSTIFICATION TABLE

#### **EXHIBIT C**

**COMPANY:** 

Florida Power & Light Company Petition by Florida Power & Light Company for Base Rate TITLE:

Increase

20250011-EI DOCKET NO.:

November 7, 2025 DATE:

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 1 <sup>st</sup> POD 15, 4 <sup>th</sup> Corrected	059686	059686	Maintenance Schedules	1	Y	All	(e)	Remy Cain
OPC 1st POD 15, 4th Corrected	059523	059685	Solar Profiles – Multiple Files	163	Y	All	(e)	Remy Cain

# EXHIBIT D DECLARATION(S)

#### FIRST REVISED EXHIBIT D

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20250011-EI

#### **DECLARATION OF REMY CAIN**

- 1. My name is Remy Cain. I am currently employed by Florida Power & Light Company ("FPL") as Principal Engineer, 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 Fourth Corrected response to the Office of Public Counsel's First Request for Production of Documents, No. 15. The documents or materials that I have reviewed and which are proprietary confidential business information contain information relating to the competitive interests of FPL or the provider of the information, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains integration studies and/or proposals prepared by a third-party vendor on behalf of FPL, and the confidential materials are proprietary to that vendor. 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 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.

Remy Cain

Date: