

ORIGINAL

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of Florida Power & Light Company's Request for Confidential Classification in the PSC Review of Distribution Systems ) DOCKET NO. \_\_\_\_\_  
 ) FILED: December 30, 1997  
 )  
 )

**REQUEST FOR CONFIDENTIAL CLASSIFICATION  
OF CERTAIN MATERIAL OBTAINED DURING  
THE FPSC's REVIEW OF DISTRIBUTION SYSTEMS**

Florida Power & Light Company ("FPL") hereby requests confidential classification of certain material obtained during the Review of Distribution Systems (the "Review") (Control No. 97-01-002)-undocketed. This request for confidential classification is filed pursuant to section 25-22.006 of the Florida Administrative Code and section 366.093 of the Florida Statutes. FPL further states:

1. Petitioner's name and address are:

Florida Power & Light Company  
P.O. Box 029100  
Miami, Florida 33102-9100

Orders, notices, or other pleadings related to this request should be served on:

Patrick M. Bryan, Esquire  
Florida Power & Light Company  
700 Universe Boulevard  
Building D-3  
Juno Beach, Florida 33408-0420

2. During the Review, Commission Staff requested access to various FPL documents related to FPL's competitive interests.

3. The following exhibits are attached hereto or are being filed separately, but contemporaneously herewith:

DOCUMENT NUMBER-DATE  
13297 DEC 30 97  
FPSC-RECORDS/REPORTING

- a. Composite Exhibit A consists of all documents for which FPL seeks confidential treatment. All information contended by FPL to be entitled to confidential treatment has been highlighted in Composite Exhibit A. Composite Exhibit A is being filed separately in a sealed envelope marked "CONFIDENTIAL."
- b. Composite Exhibit B, attached, consists of all documents for which FPL seeks confidential treatment. All information contended by FPL to be entitled to confidential treatment has been redacted in Composite Exhibit B.
- c. Exhibit C, attached, is a line by line and page by page justification matrix including identification of information for which confidential treatment is sought, and correlation of the confidential information with the specific justification for the claim of confidentiality.
- d. Exhibit D, attached, is the affidavit of Linda R. Whalin  
Exhibit E, attached, is the affidavit of Dennis Brandt
- e. Exhibit F is a computer diskette containing FPL's justification matrix (Exhibit C).

4. The material in Exhibit A for which FPL seeks confidential treatment should not be declassified for a period of at least 18 months and should be returned to FPL in accordance with section 366.093(4) of the Florida Statutes as soon as the information is no longer necessary for the Commission to conduct its business. Since the materials include documents which are related to FPL's competitive interests, the materials should remain confidential while at the Commission and should be returned to FPL so that FPL can maintain the confidential nature of the documents.

5. FPL seeks confidential protection for this information pursuant to section 366.093(3)(e) (data, the disclosure of which has the potential to cause competitive harm), and section 366.093(3)(f) (employee personnel information unrelated to compensation, duties, qualifications, or responsibilities). Pursuant to section 366.093, such materials are entitled to confidential treatment and exempt from the mandatory disclosure provisions of the public records law. Thus, once the Commission determines that the information is encompassed by sections 366.093(e) and (f), the Commission is not required to balance the danger of disclosure against the public interest in access.

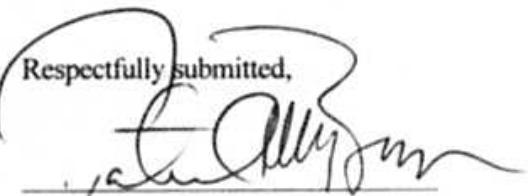
6. Within the justification matrix (Exhibit C) the column marked "FLORIDA STATUTE 366.093(3)" is keyed to justifications for confidentiality contained within the referenced statute. For lines marked "(e)", the justification for confidentiality is that the referenced material is related to competitive interests of FPL and disclosure would impair FPL's competitive business within the meaning of section 366.093(3)(e) of the Florida Statutes. For lines marked "(f)", the justification for confidentiality is that the referenced material is related to employee personnel information unrelated to compensation, duties, qualifications, or responsibilities within the meaning of section 366.093(3)(f)

of the Florida Statutes. The justification for confidentiality of the referenced material is more fully set forth in the affidavits of Linda R. Whalin and Dennis Brandt.

CONCLUSION

FPL requests confidentiality protection as to the material set out and described in the attached confidentiality justification matrix (Exhibit C).

Respectfully submitted,

  
\_\_\_\_\_  
PATRICK M. BRYAN, ESQUIRE  
700 Universe Boulevard  
Building D-3  
Juno Beach, Florida 33408-0420  
(561) 691-7101

Attorney for Florida Power  
& Light Company

**Exhibit A**

**CONFIDENTIAL DOCUMENTS**

**(SUBMITTED SEPARATELY)**

**Exhibit B**

**REDACTED DOCUMENTS**

**(SUBMITTED SEPARATELY)**

**Exhibit C**

**Justification Matrix**

**LIST OF CONFIDENTIAL DOCUMENTS**

**REVIEW OF DISTRIBUTION SYSTEMS**

COMPANY: FPL

TITLE: LIST OF CONFIDENTIAL WORKPAPERS

AUDIT: REVIEW OF DISTRIBUTION SYSTEMS, Control No. 97-01-002

DATE: DECEMBER 29, 1997

FLORIDA

STATUTE

Document

Request

NO.

DESCRIPTION

CONF	LINE NO /	366 093(3)		
PAGES	Y/N	COLUMN NO.	Section	Affidavit
11 of 11	Y	col A-E, item 1	366 093(3)e	DB
8 of 8	Y	col A-E, item 1	366 093(3)e	DB
11 of 11	Y	col A-E, item 1	366 093(3)e	DB
13 of 13	Y	col A-D, item 1	366 093(3)e	DB
78 of 78	Y	col A-H, item 1	366 093(3)e	DB
67 of 67	Y	col A-N, item 1	366 093(3)e	DB
78 of 78	Y	col A-h, item 1	366 093(3)e	DB
67 of 67	Y	col A-N, item 1	366 093(3)e	DB
1-2 of 43	Y	col A-E	366 093(3)e	DB
3 of 43	Y	col A-G	366 093(3)e	DB
4-13 of 43	Y	col A-E	366 093(3)e	DB
14 of 43	Y	col A-H	366 093(3)e	DB
15 of 43	Y	cols A-E	366 093(3)e	DB
16 of 43	Y	col A-U	366 093(3)e	DB
17-18 of 43	Y	col A-E	366 093(3)e	DB
19-20 of 43	Y	col A-H	366 093(3)e	DB
21 of 43	Y	col A-F	366 093(3)e	DB
22 of 43	Y	col A-H	366 093(3)e	DB
23 of 43	Y	col A-G	366 093(3)e	DB
24 of 43	Y	col A-D	366 093(3)e	DB
25 of 43	Y	col A-G	366 093(3)e	DB
26-36 of 43	Y	rows A-E	366 093(3)e	DB
37-38 of 43	Y	col A-T, item 1	366 093(3)e	DB
39-41 of 43	Y	col A-E	366 093(3)e	DB
42 of 43	Y	col A-T, item 1	366 093(3)e	DB
43 of 43	Y	col A-D	366 093(3)e	DB
9 of 9	Y	col A-Z, item 1	366 093(3)e	DB
7 of 7	Y	col A-Z, item 1	366 093(3)e	DB
1 of 31	Y	col A-F, item 1	366 093(3)e	DB
2 of 31	Y	col A-D, item 1	366 093(3)e	DB
3-4 of 31	Y	col A-C, item 1	366 093(3)e	DB
5 of 31	Y	col A-E, item 1	366 093(3)e	DB
6-9 of 31	Y	col A-G, item 1	366 093(3)e	DB
10 of 31	Y	col A-C, item 1	366 093(3)e	DB
11-12 of 31	Y	col A-G, item 1	366 093(3)e	DB
13 of 31	Y	col A-C, item 1	366 093(3)e	DB
14-16 of 31	Y	col A-F, item 1	366 093(3)e	DB
17 of 31	Y	col A-C, item 1	366 093(3)e	DB
18-20 of 31	Y	col A-F, item 1	366 093(3)e	DB
21 of 31	Y	col A-E, item 1	366 093(3)e	DB

1	27-A	Residential Customer Quality & Value Relationship	11 of 11	Y	col A-E, item 1	366 093(3)e	DB
1	27-B	Residential Customer Quality & Value Relationship	8 of 8	Y	col A-E, item 1	366 093(3)e	DB
1	27-C	Residential Customer Quality & Value Relationship	11 of 11	Y	col A-E, item 1	366 093(3)e	DB
1	27-D	Residential Customer Quality & Value Relationship	13 of 13	Y	col A-D, item 1	366 093(3)e	DB
1	27-E	Residential Customer Power Distribution Reliability Tracking Study	78 of 78	Y	col A-H, item 1	366 093(3)e	DB
1	27-F	Residential Customer Power Distribution Reliability Tracking Study	67 of 67	Y	col A-N, item 1	366 093(3)e	DB
1	27-G	Residential Customer Power Distribution Reliability Tracking Study	78 of 78	Y	col A-h, item 1	366 093(3)e	DB
1	27-H	Residential Customer Power Distribution Reliability Tracking Study	67 of 67	Y	col A-N, item 1	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	1-2 of 43	Y	col A-E	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	3 of 43	Y	col A-G	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	4-13 of 43	Y	col A-E	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	14 of 43	Y	col A-H	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	15 of 43	Y	cols A-E	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	16 of 43	Y	col A-U	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	17-18 of 43	Y	col A-E	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	19-20 of 43	Y	col A-H	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	21 of 43	Y	col A-F	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	22 of 43	Y	col A-H	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	23 of 43	Y	col A-G	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	24 of 43	Y	col A-D	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	25 of 43	Y	col A-G	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	26-36 of 43	Y	rows A-E	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	37-38 of 43	Y	col A-T, item 1	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	39-41 of 43	Y	col A-E	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	42 of 43	Y	col A-T, item 1	366 093(3)e	DB
1	27-J	FPL Service Reliability Study - Large Demand	43 of 43	Y	col A-D	366 093(3)e	DB
1	27-K	Benchmark Study	9 of 9	Y	col A-Z, item 1	366 093(3)e	DB
1	27-L	Benchmark Study	7 of 7	Y	col A-Z, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	1 of 31	Y	col A-F, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	2 of 31	Y	col A-D, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	3-4 of 31	Y	col A-C, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	5 of 31	Y	col A-E, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	6-9 of 31	Y	col A-G, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	10 of 31	Y	col A-C, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	11-12 of 31	Y	col A-G, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	13 of 31	Y	col A-C, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	14-16 of 31	Y	col A-F, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	17 of 31	Y	col A-C, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	18-20 of 31	Y	col A-F, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	21 of 31	Y	col A-E, item 1	366 093(3)e	DB

1	27-M	FPL Service Reliability Study - 200-499 KWD	22 of 31	Y	rows A-B, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	23 of 31	Y	col A-D, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	24-26 of 31	Y	col A-C, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	27 of 31	Y	col A-I, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	28-29 of 31	Y	col A-F, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	30 of 31	Y	col A-E, item 1	366 093(3)e	DB
1	27-M	FPL Service Reliability Study - 200-499 KWD	31 of 31	Y	col A-I, item 1	366 093(3)e	DB
1	27-N	Small Demand Customer	51 of 51	Y	col A-E, item 1	366 093(3)e	DB
1	27-O	Large C/I Demand Customers	49 of 49	Y	col A-M, item 1	366 093(3)e	DB
1	27-P	Medium Demand Customers	42 of 42	Y	col A-E, item 1	366 093(3)e	DB
1	27-Q	GS and Small CI Customers	19 of 19	Y	col A, item 1	366 093(3)e	DB
1	27-R	CI Benchmark	15 of 15	Y	col A-J, item 1	366 093(3)e	DB
	27-S	Large C/I Demand	48 of 48	Y	col A-R, item 1	366 093(3)e	DB
	27-T	Residential Customer Quality and Value	2 of 2	Y	col A-O, item 1	366 093(3)e	DB
4-17 A1	Residential Customer Quality & Value Relationship	22 of 22	Y	col A-O, item 1	366 093(3)e	DB	
4-17 B1	Residential Customer Quality & Value Relationship	16 of 16	Y	col A-O, item 1	366 093(3)e	DB	
4-17 C1	Residential Customer Quality & Value Relationship	22 of 22	Y	col A-O, item 1	366 093(3)e	DB	
4-17 D1	Residential Customer Quality & Value Relationship	26 of 26	Y	col A-L, item 1	366 093(3)e	DB	
4-17 N1	Small Demand Customers	52 of 52	Y	col A-Q, item 1	366 093(3)e	DB	
4-17 O1	Large C/I Demand Customers	49 of 49	Y	col A-M, item 1	366 093(3)e	DB	
4-17 P1	Medium Demand Customers	42 of 42	Y	col A-Q, item 1	366 093(3)e	DB	
4-17 Q1	GS and Small CI Customers	19 of 19	Y	col A-Q, item 1	366 093(3)e	DB	
4-13	List of Surveys	3 of 3	Y	col F	366 093(3)e	DB	
4	15	Residential Customer Quality and Value	2 through 7	Y	col D,H,L, item 1	366 093(3)e	DB
1	26-A	Residential Customer Quality & Value Relationship	2 & 4 of 4	y	Items a-e	366 093(3)e	DB
1	26-A	Residential Customer Quality & Value Relationship	3 of 4	y	Items a-f	366 093(3)e	DB
1	26-B	Residential Customer Quality & Value Relationship	2 & 4 of 4	y	Items a-e	366 093(3)e	DB
1	26-B	Residential Customer Quality & Value Relationship	3 of 4	y	Items a-f	366 093(3)e	DB
1	26-C	Residential Customer Quality & Value Relationship	2 & 4 of 4	y	Items a-e	366 093(3)e	DB
1	26-C	Residential Customer Quality & Value Relationship	3 of 4	y	Items a-f	366 093(3)e	DB
1	26-C1	Residential Customer Quality & Value Relationship	1&3 of 3	y	Items a-e	366 093(3)e	DB
1	26-C1	Residential Customer Quality & Value Relationship	2 of 3	y	Items a-f	366 093(3)e	DB
1	26-C2	Residential Customer Quality & Value Relationship	1 of 2	y	Items a	366 093(3)e	DB
1	26-C2	Residential Customer Quality & Value Relationship	2 of 2	y	Items b - h	366 093(3)e	DB
1	26-C3	Residential Customer Quality & Value Relationship	1 of 2	y	Items a - c	366 093(3)e	DB
1	26-C3	Residential Customer Quality & Value Relationship	2 of 2	y	Items b - e	366 093(3)e	DB
1	26-D	Residential Customer Quality & Value Relationship	2 of 8	y	item a	366 093(3)e	DB
1	26-D	Residential Customer Quality & Value Relationship	3 of 8	y	items b - h	366 093(3)e	DB
1	26-D	Residential Customer Quality & Value Relationship	4 of 8	y	item a - e	366 093(3)e	DB
1	26-D	Residential Customer Quality & Value Relationship	5 of 8	y	items b - d	366 093(3)e	DB
1	26-D	Residential Customer Quality & Value Relationship	6 of 8	y	items a, c - e	366 093(3)e	DB
1	26-D	Residential Customer Quality & Value Relationship	7 of 8	y	items a, c - f	366 093(3)e	DB
1	26-D	Residential Customer Quality & Value Relationship	8 of 8	y	items a - e	366 093(3)e	DB
1	26-E	Residential Customer Power Distribution Reliability Tracking Study	1 -3 of 11	y	items a - c	366 093(3)e	DB
1	26-E	Residential Customer Power Distribution Reliability Tracking Study	4 of 11	y	items a - i	366 093(3)e	DB
1	26-E	Residential Customer Power Distribution Reliability Tracking Study	5 of 11	y	items a - e	366 093(3)e	DB

1	26-E	Residential Customer Power Distribution Reliability Tracking Study	6 of 11	y	items a -f	366.093(3)e	DB
1	26-E	Residential Customer Power Distribution Reliability Tracking Study	7 of 11	y	items a -c	366.093(3)e	DB
1	26-E	Residential Customer Power Distribution Reliability Tracking Study	8 & 9 of 11	y	items a -e	366.093(3)e	DB
1	26-E	Residential Customer Power Distribution Reliability Tracking Study	10 of 11	y	items a -f	366.093(3)e	DB
1	26-E	Residential Customer Power Distribution Reliability Tracking Study	11 of 11	y	items a -e	366.093(3)e	DB
1	26-F	Residential Customer Power Distribution Reliability Tracking Study	1 of 11	y	item d	366.093(3)e	DB
1	26-F	Residential Customer Power Distribution Reliability Tracking Study	2 & 3 of 11	y	items a - c	366.093(3)e	DB
1	26-F	Residential Customer Power Distribution Reliability Tracking Study	4 of 11	y	items a - h	366.093(3)e	DB
1	26-F	Residential Customer Power Distribution Reliability Tracking Study	5 of 11	y	items a -e	366.093(3)e	DB
1	26-F	Residential Customer Power Distribution Reliability Tracking Study	6 of 11	y	items a - f	366.093(3)e	DB
1	26-F	Residential Customer Power Distribution Reliability Tracking Study	7 of 11	y	items a - c	366.093(3)e	DB
1	26-F	Residential Customer Power Distribution Reliability Tracking Study	8 of 11	y	items a - e	366.093(3)e	DB
1	26-F	Residential Customer Power Distribution Reliability Tracking Study	9 of 11	y	items a - b	366.093(3)e	DB
1	26-F	Residential Customer Power Distribution Reliability Tracking Study	10 of 11	y	items a - f	366.093(3)e	DB
1	26-F	Residential Customer Power Distribution Reliability Tracking Study	11 of 11	y	items a - e	366.093(3)e	DB
1	26-G	Residential Customer Power Distribution Reliability Tracking Study	1 of 11	y	item c	366.093(3)e	DB
1	26-G	Residential Customer Power Distribution Reliability Tracking Study	2 - 3 of 11	y	items a -c	366.093(3)e	DB
	26-G	Residential Customer Power Distribution Reliability Tracking Study	4 of 11	y	items a -i	366.093(3)e	DB
	26-G	Residential Customer Power Distribution Reliability Tracking Study	5 of 11	y	items a -e	366.093(3)e	DB
	26-G	Residential Customer Power Distribution Reliability Tracking Study	6 of 11	y	items a -f	366.093(3)e	DB
	26-G	Residential Customer Power Distribution Reliability Tracking Study	7 of 11	y	items a -c	366.093(3)e	DB
	26-G	Residential Customer Power Distribution Reliability Tracking Study	8 & 9 of 11	y	items a -e	366.093(3)e	DB
	26-G	Residential Customer Power Distribution Reliability Tracking Study	10-11 of 11	y	items a -e	366.093(3)e	DB
1	26-H	Residential Customer Power Distribution Reliability Tracking Study	1 of 11	y	item c	366.093(3)e	DB
	26-H	Residential Customer Power Distribution Reliability Tracking Study	2 - 4 of 11	y	items a - c	366.093(3)e	DB
	26-H	Residential Customer Power Distribution Reliability Tracking Study	5 of 11	y	items a - d	366.093(3)e	DB
	26-H	Residential Customer Power Distribution Reliability Tracking Study	6 of 11	y	items a -b, d-f	366.093(3)e	DB
	26-H	Residential Customer Power Distribution Reliability Tracking Study	7 of 11	y	items a - c	366.093(3)e	DB
	26-H	Residential Customer Power Distribution Reliability Tracking Study	8 of 11	y	items a - e	366.093(3)e	DB
	26-H	Residential Customer Power Distribution Reliability Tracking Study	9 of 11	y	items a - b	366.093(3)e	DB
	26-H	Residential Customer Power Distribution Reliability Tracking Study	10 of 11	y	items a - g	366.093(3)e	DB
	26-H	Residential Customer Power Distribution Reliability Tracking Study	11 of 11	y	items a - e	366.093(3)e	DB
						366.093(3)e	DB
1	26-I	GS Small Medium C/I customers	1 of 3	y	items a, c-e	366.093(3)e	DB
1	26-I	GS Small Medium C/I customers	2 of 3	y	items a-h	366.093(3)e	DB
1	26-I	GS Small Medium C/I customers	3 of 3	y	items a-f	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	1 of 25	y	items a - g	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	2 of 25	y	items a-d	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	3 - 4 of 25	y	items a-e	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	5 of 25	y	items a - g	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	6 of 25	y	items a-e	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	6-7 of 25	y	items a-d	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	8-9 of 25	y	items a-f	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	10 of 25	y	items a - g	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	11 - 12 of 25	y	items a - b	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	13 of 25	y	items a-c	366.093(3)e	DB

1	26-J	FPL Service Reliability Study - Large Demand	14 of 25	y	items a-g	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	15- 16 of 25	y	items a-f	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	17 of 25	y	items a-d	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	18 of 25	y	items a - g	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	19 of 25	y	items a - e	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	20 of 25	y	items a - g	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	21 of 25	y	items a - b	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	22 of 25	y	items a - e	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	23 of 25	y	items a - f	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	24 of 25	y	items a - d	366.093(3)e	DB
1	26-J	FPL Service Reliability Study - Large Demand	25 of 25	y	items a - b	366.093(3)e	DB
1	26-K	Benchmark Study	1 of 1	y	items a - l	366.093(3)e	DB
1	26-L	Benchmark Study	1 of 1	y	items a - h	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	1 of 25	y	items a - g	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	2-3 of 25	y	items a - f	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	4 of 25	y	items a - e	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	5 of 25	y	items a - f	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	6-7 of 25	y	items a - d	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	8 of 25	y	items a - h	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	9 of 25	y	items a - f	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	10 of 25	y	items a - g	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	11 of 25	y	items a - b	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	12 of 25	y	items a - f	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	13 of 25	y	items a - d	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	14 of 25	y	items a - h	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	15 of 25	y	items a - e	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	16 of 25	y	items a - f	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	17 of 25	y	items a - d	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	18 of 25	y	items a - g	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	19 of 25	y	items a - e	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	20 of 25	y	items a - g	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	21 of 25	y	items a - c	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	22-23 of 25	y	items a - f	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	24 of 25	y	items a - d	366.093(3)e	DB
1	26-M	FPL Service Reliability Study - 200-499 KWD	25 of 25	y	items a, c	366.093(3)e	DB
1	26-N1	Small Demand Customers	1 of 7	y	items a - c	366.093(3)e	DB
1	26-N1	Small Demand Customers	2 - 5 of 7	y	items a - e	366.093(3)e	DB
1	26-N1	Small Demand Customers	6-7 of 7	y	items a - c	366.093(3)e	DB
1	26-N2	Small Demand Customers	1 of 4	y	items a - c	366.093(3)e	DB
1	26-N2	Small Demand Customers	2 of 4	y	items a - d	366.093(3)e	DB
1	26-N2	Small Demand Customers	3 of 4	y	items a - b	366.093(3)e	DB
1	26-N2	Small Demand Customers	4 of 4	y	items a - f	366.093(3)e	DB
1	26-N3	Small Demand Customers	1 of 3	y	items a - e	366.093(3)e	DB
1	26-N3	Small Demand Customers	2-3 of 3	y	items a - g	366.093(3)e	DB
1	26-N4	Small Demand Customers	1 of 4	y	items a - e	366.093(3)e	DB
1	26-N4	Small Demand Customers	2 of 4	y	items a - d	366.093(3)e	DB
1	26-N4	Small Demand Customers	3 of 4	y	items a - j	366.093(3)e	DB
1	26-N4	Small Demand Customers	4 of 4	y	items a - g	366.093(3)e	DB

1	26-N5	Small Demand Customers	1 of 3	y	items a - e	366.093(3)e	DB
1	26-N5	Small Demand Customers	2 of 3	y	items a - h	366.093(3)e	DB
1	26-N5	Small Demand Customers	3 of 3	y	items a - g	366.093(3)e	DB
1	26-O1	Large C/I Demand Customers	1 of 7	y	items a - c	366.093(3)e	DB
1	26-O1	Large C/I Demand Customers	2 of 7	y	items a - j	366.093(3)e	DB
1	26-O1	Large C/I Demand Customers	3 of 7	y	items a - d	366.093(3)e	DB
1	26-O1	Large C/I Demand Customers	4 of 7	y	items a - e	366.093(3)e	DB
1	26-O1	Large C/I Demand Customers	5 of 7	y	items a - c	366.093(3)e	DB
1	26-O1	Large C/I Demand Customers	6 of 7	y	items a - g	366.093(3)e	DB
1	26-O1	Large C/I Demand Customers	7 of 7	y	items a - c	366.093(3)e	DB
1	26-O2	Large C/I Demand Customers	1 of 8	y	items a - b	366.093(3)e	DB
1	26-O2	Large C/I Demand Customers	2 of 8	y	items a - f	366.093(3)e	DB
1	26-O2	Large C/I Demand Customers	3 of 8	y	items a - d	366.093(3)e	DB
1	26-O2	Large C/I Demand Customers	4 of 8	y	items a - e	366.093(3)e	DB
1	26-O2	Large C/I Demand Customers	5 - 6 of 8	y	items a - d	366.093(3)e	DB
1	26-2	Large C/I Demand Customers	7 of 8	y	items a-f	366.093(3)e	DB
1	26-O2	Large C/I Demand Customers	8 of 8	y	items a - g	366.093(3)e	DB
1	26-O3	Large C/I Demand Customers	1 of 3	y	items a - f	366.093(3)e	DB
1	26-O3	Large C/I Demand Customers	2 of 3	y	items a - j	366.093(3)e	DB
1	26-O3	Large C/I Demand Customers	3 of 3	y	items a - i	366.093(3)e	DB
1	26-O4	Large C/I Demand Customers	1 of 4	y	items a	366.093(3)e	DB
1	26-O4	Large C/I Demand Customers	2 of 4	y	items a - e	366.093(3)e	DB
1	26-O4	Large C/I Demand Customers	3 of 4	y	items a - i	366.093(3)e	DB
1	26-O4	Large C/I Demand Customers	4 of 4	y	items a - h	366.093(3)e	DB
1	26-O5	Large C/I Demand Customers	1 of 4	y	items a	366.093(3)e	DB
1	26-O5	Large C/I Demand Customers	2 of 4	y	items a - e	366.093(3)e	DB
1	26-O5	Large C/I Demand Customers	3 of 4	y	items a - i	366.093(3)e	DB
1	26-O5	Large C/I Demand Customers	4 of 4	y	items a - h	366.093(3)e	DB
1	26-P1	Medium Demand Customers	1 of 7	y	items a - c	366.093(3)e	DB
1	26-P1	Medium Demand Customers	2 of 7	y	items a - f	366.093(3)e	DB
1	26-P1	Medium Demand Customers	3 of 7	y	items a - e	366.093(3)e	DB
1	26-P1	Medium Demand Customers	4 of 7	y	items a - d	366.093(3)e	DB
1	26-P1	Medium Demand Customers	5 of 7	y	items a - f	366.093(3)e	DB
1	26-P1	Medium Demand Customers	6-7 of 7	y	items a - c	366.093(3)e	DB
1	26-P2	Medium Demand Customers	1 of 4	y	items a - c	366.093(3)e	DB
1	26-P2	Medium Demand Customers	2 of 4	y	items a - e	366.093(3)e	DB
1	26-P2	Medium Demand Customers	3 of 4	y	items a - c	366.093(3)e	DB
1	26-P2	Medium Demand Customers	4 of 4	y	items a - g	366.093(3)e	DB
1	26-P3	Medium Demand Customers	1 of 3	y	items a - f	366.093(3)e	DB
1	26-P3	Medium Demand Customers	2-3 of 3	y	items a - h	366.093(3)e	DB
1	26-P4	Medium Demand Customers	1 of 3	y	items a - e	366.093(3)e	DB
1	26-P4	Medium Demand Customers	2 of 3	y	items a - i	366.093(3)e	DB
1	26-P4	Medium Demand Customers	3 of 3	y	items a - h	366.093(3)e	DB
1	26-P5	Medium Demand Customers	1 of 3	y	items a - e	366.093(3)e	DB
1	26-P5	Medium Demand Customers	2 of 3	y	items a - i	366.093(3)e	DB
1	26-P5	Medium Demand Customers	3 of 3	y	items a - g	366.093(3)e	DB
1	26-Q	GS and Small C/I Customers	1 of 4	y	items a - e	366.093(3)e	DB
1	26-Q	GS and Small C/I Customers	2 of 4	y	items a - d	366.093(3)e	DB

1	26-Q	GS and Small CI Customers	3 of 4	y	items a - j	366.093(3)e	DB
1	26-Q	GS and Small CI Customers	4 of 4	y	items a - g	366.093(3)e	DB
1	26-R	CI Benchmark	1 of 4	y	items a - b	366.093(3)e	DB
1	26-R	CI Benchmark	2 of 4	y	items a - e	366.093(3)e	DB
1	26-R	CI Benchmark	3-4 of 4	y	items a - g	366.093(3)e	DB
2	2 Environmental Assessment		12 of 61	y	item a	366.093(3)e	LW
2	2 Environmental Assessment		13 of 61	y	item a - e	366.093(3)e	LW
2	2 Environmental Assessment		15 of 61	y	item a	366.093(3)e	LW
2	2 Environmental Assessment		17 of 61	y	item a	366.093(3)e	LW
2	2 Environmental Assessment		19 of 61	y	item a - j	366.093(3)e	LW
2	2 Environmental Assessment		20 of 61	y	item a - s	366.093(3)e	LW
2	2 Environmental Assessment		21 of 61	y	item a - x	366.093(3)e	LW
2	2 Environmental Assessment		22 of 61	y	item a - r	366.093(3)e	LW
2	2 Environmental Assessment		23 of 61	y	item a - n	366.093(3)e	LW
2	2 Environmental Assessment		24 of 61	y	item a - o	366.093(3)e	LW
2	2 Environmental Assessment		26 of 61	y	item a - g	366.093(3)e	LW
2	2 Environmental Assessment		27 of 61	y	item a - o	366.093(3)e	LW
2	2 Environmental Assessment		28 of 61	y	item a - p	366.093(3)e	LW
2	2 Environmental Assessment		33 of 61	y	item a - j	366.093(3)e	LW
2	2 Environmental Assessment		38 of 61	y	item a	366.093(3)e	LW
2	2 Environmental Assessment		39 of 61	y	item a - b	366.093(3)e	LW
2	2 Environmental Assessment		40 of 61	y	item a - e	366.093(3)e	LW
2	2 Environmental Assessment		41 of 61	y	item a - c	366.093(3)e	LW
2	2 Environmental Assessment		42 of 61	y	item a - c	366.093(3)e	LW
2	2 Environmental Assessment		43 of 61	y	item a - d	366.093(3)e	LW
2	2 Environmental Assessment		44 of 61	y	item a - c	366.093(3)e	LW
2	2 Environmental Assessment		45 of 61	y	item a - c	366.093(3)e	LW
2	2 Environmental Assessment		46 of 61	y	item a - g	366.093(3)e	LW
2	2 Environmental Assessment		47 of 61	y	item a - d	366.093(3)e	LW
2	2 Environmental Assessment		48 of 61	y	item a - f	366.093(3)e	LW
2	2 Environmental Assessment		49 of 61	y	item a - e	366.093(3)e	LW
2	2 Environmental Assessment		50-51 of 61	y	item a - f	366.093(3)e	LW
2	2 Environmental Assessment		52 of 61	y	item a - e	366.093(3)e	LW
2	2 Environmental Assessment		53 of 61	y	item a - u	366.093(3)e	LW
2	2 Environmental Assessment		54-56 of 61	y	item a - f	366.093(3)e	LW
2	2 Environmental Assessment		57 - 58 of 61	y	item a - e	366.093(3)e	LW

1	1-3	Distribution Planning 5-Year Plan	3 of 3	Y	column A	366.093(3)e
						LW

4	4-9	Underground Cable Injection	2 of 7	Y	col C	366.093(3)f
4	42c	Claims Procedures	7 of 30	Y	In A-J, col A,B,C	366.093(3)f
2	2-9	Reliability Indicators	2 of 3	Y	col A & B	366.093(3)e
2	2-9	Reliability Indicators	3 of 3	Y	col A	366.093(3)e
						LW

**Exhibit D**

**AFFIDAVIT OF  
LINDA R. WHALIN**

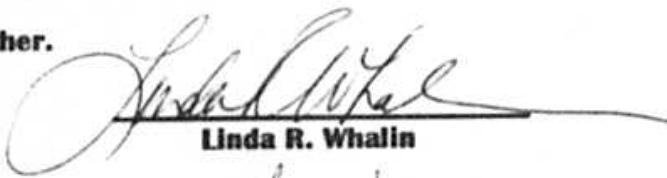
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

STATE OF FLORIDA )  
DADE COUNTY )

AFFIDAVIT OF LINDA R. WHALIN

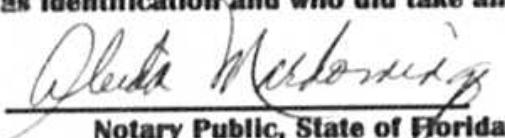
Before me the undersigned authority personally appeared Linda R. Whalin who, being first duly sworn, deposes and says:

1. My name is Linda R. Whalin. I am currently employed by Florida Power & Light Company (FPL) as Distribution Reliability Manager. I have personal knowledge of the matters stated in this affidavit.
2. This affidavit pertains to all materials identified as exempt from disclosure pursuant to Section 366.093(3)(e) Florida Statutes, excluding only document numbers 1-26, 1-27, 4-13, and 4-15 (for which a separate affidavit is offered). The information contained in such materials relate to FPL's competitive interests. The disclosure of such information would impair the competitive business of FPL.
3. The confidentiality of the information has been maintained by FPL.
4. The obtained materials should remain confidential for a period of not less than 18 months and 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 maintain the confidential nature of these documents.
5. Affiant says nothing further.



Linda R. Whalin

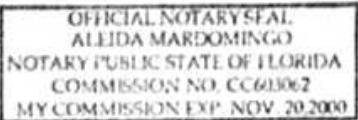
SWORN TO AND SUBSCRIBED before me this 17<sup>th</sup> day of December, 1997,  
by Linda R. Whalin, who is personally known to me or who has produced  
Personally Known (type of identification) as identification and who did take an  
oath.



Aleida Mardomingo

Notary Public, State of Florida

My Commission Expires: Nov. 20, 2000  
373/pmb



**Exhibit E**

**AFFIDAVIT OF  
DENNIS BRANDT**

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

STATE OF FLORIDA )

DADE COUNTY )

## AFFIDAVIT OF DENNIS BRANDT

Before me the undersigned authority personally appeared Dennis Brandt who, being first duly sworn, deposes and says:

1. My name is Dennis Brandt. I am currently employed by Florida Power & Light Company (FPL) as Manager of Research & Geospatial Planning.

I have personal knowledge of the matters stated in this affidavit.

2. This affidavit pertains specifically to document numbers 1-26, 1-27, 4-13, and 4-15 identified as exempt from disclosure pursuant to Section 366.093(3)(e) Florida Statutes. The information contained in such materials relates to FPL's competitive interests and has been used in the formulation of FPL business strategies. The disclosure of such information would impair the competitive business of FPL.

3. The confidentiality of the information has been maintained by FPL.

4. The obtained materials should remain confidential for a period of not less than 18 months and 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 maintain the confidential nature of these documents.

5. Altant says nothing further.

Dennis Brandt  
Dennis Brandt

SWORN TO AND SUBSCRIBED before me this 29<sup>th</sup> day of December, 1997, by  
Dennis Brandt, who is personally known to me or who has produced  
(Type of Identification) as identification and who did take an oath.

Nelly Salas  
Notary Public, State of Florida

My Commission Expires:  
374pm

