



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: October 28, 2003

TO: Office of General Counsel (Rodan) *W*

FROM: Division of Auditing and Safety (Freeman, Vandiver)

RE: Docket 030001-EI, Recommendation concerning Florida Power & Light Company's (FPL's) request for confidential classification concerning a portion of the staff working papers prepared during "FPL Capacity Cost Recovery Clause Audit for the 12 Months Ended December 31, 2002", Audit Control No. 03-036-4-1, Documents Numbered 05786-03, 06094-03 and 06256-03

On June 18 and June 24, 2003, when copies of certain portions of staff's working papers obtained or prepared during the "FPL Capacity Cost Recovery Clause Audit for the Twelve Months Ended December 31, 2002", were delivered to FPL at the audit exit conference, the utility requested that these materials be temporarily exempted from public access in accordance with the provisions of Rule 25-22.006(3)(a)(2.), Florida Administrative Code (FAC).

On June 30, 2003, staff filed document 05786-03 consisting of those specified portions of the staff working papers,

On July 9 and July 15, 2003, FPL filed requests pursuant to Rule 25-22.006, FAC, and Section 366.093, Florida Statutes (F.S.), that selected portions of the working papers prepared by staff during the audit receive confidential classification. The utility's request included redacted copies for public inspection (Exhibit B, document 06093-03 and document 06257-03) and highlighted copies (documents 06094-03 and 06256-03).

Documents 05786-03, 06094-03 and 06256-03 are currently held by the Commission's Division of the Commission Clerk and Administrative Services as confidential pending resolution of FPL's request for extension of confidential classification.

Pursuant to Section 119.07, F.S., documents submitted to this Commission are public records. The only exceptions to this law are specific statutory exemptions and exemptions granted by governmental agencies pursuant to the specific items of a statutory provision. Subsections 366.093(3)(b)(d) and (e), F.S., and subsection 163.01(15)(m), F.S., provide the following exemptions:

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC T
- OTH *Argente*

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Subsection 366.093, F.S., provides; "Proprietary confidential business information means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. Proprietary confidential business information includes but is not limited to:....

(b) Internal auditing controls and reports of internal auditors....

(d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods and services on favorable terms.

(e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information...."

Subsection 163.01(15)(m), F.S., provides; "In the event that any public agency or any such legal entity, or both, should receive, in connection with its joint ownership or right to services, output, capacity, or energy of an electric project, as defined in paragraph (3)(d), any material which is designated by the person supplying such material as proprietary confidential business information or which a court of competent jurisdiction has designated as confidential or secret shall be kept confidential and shall be exempt from the provisions of s. 119.07(1). As used in this paragraph, "proprietary confidential business information" includes, but is not limited to, trade secrets; internal auditing controls and reports of internal auditors; security measures, systems, or procedures; information concerning bids or other contractual data, the disclosure of which would impair the efforts of the utility to contract for services on favorable terms; employee personnel information unrelated to compensation, duties, qualifications, or responsibilities; and formulas, patterns, devices, combinations of devices, contract costs, or other information the disclosure of which would injure the affected utility in the marketplace."

According to Section 366.093, F.S., and Rule 25-22.006, FAC, the utility has the burden of demonstrating that materials qualify for confidential classification. According to rule 25-22.006, FAC, the utility must meet this burden by demonstrating that the information is proprietary confidential business information, the disclosure of which will cause the utility, the provider of the information or the ratepayer harm.

Staff Analysis of the Request

Reading the FPL filing reveals the sensitive material consists of;

1. Information relating to FPL's competitive interests which also includes contractual data such as pricing and other terms, payment records, and contractor/supplier rates.

According to Osvaldo Lom, FPL Supervisor, Purchase Power Contracts, Wholesale Services; "...Disclosure [of this information]...would reveal...sensitive pricing and contract terms, which would be valuable to competitors of FPL in identifying key elements of FPL's business plans in this area. Viewing those terms together with other cost data for which confidential treatment has been sought would also provide a competitor with an unfair advantage in assessing or projecting FPL's production cost structure. Disclosure of contractual data such as pricing and other terms, payment records, and contractor/supplier rates also would impair the efforts of FPL to contract for goods and services on favorable terms and/or would impair the competitive interests of the contractors...."

2. Bank account information.

Section 119.07(1)(dd), F.S., provides; Bank account numbers and debit, charge and credit card numbers held by an agency are exempt from subsection (1) and s. 24(a), Art I of the State Constitution. This exemption applies to bank account numbers and debit, charge and credit card numbers held by an agency before, on or after the effective date of this exemption. This paragraph is subject to the Open Government Sunset Review Act of 1995 in accordance with s. 119.15, and shall stand repealed on October 2, 2007, unless reviewed and saved from repeal through reenactment by the Legislature.

Mr. Lom reports; "...FPL and its counter-parties routinely protect each other's bank account information. This is an important matter of commercial security, because publication of bank account information could facilitate unauthorized access to those accounts and other abuses...." Rita McLellan, FPL Supervisor of Accounting, adds; "...These [bank account] numbers are held as confidential to avoid misuse of the numbers for fraudulent purposes...."

Mr. Lom identifies competitive information and bank account information as reported within staff's working papers entitled; "Estimate Purchase Power and Billing Summary", "Check Request", "Actual Transmission Service Billing Summary", "Bill No. 185", "Check Requests", "Allocation of Interest", "Bill No. 187", .

Ms. McLellan identifies sensitive bank account information contained in staff's working paper entitled; "Banking Statement."

Staff Analysis of the request (continued)

3. Contractual data such as pricing and other terms, payment records, and contractor/supplier rates which affects the competitive interests of the provider of the information.

Mr. Scott Borgmeyer, FPL Director of Finance, Accounting and Planning, reports staff's working papers contain sensitive contractual information concerning contracts, contract prices, and other contractual information release of which could impair the competitive business of the provider of the information or impair FPL's ability to contract favorably for goods and services. Specifically, Mr. Borgmeyer identifies the following staff working papers as containing this type of information; "Desoto County", "Florida Power Corp", "Constellation Power Source", "On-Demand Query Report", "Reliant Energy", "Desoto County", "Oleander Power Project Payment", "Reliant Energy", "Desoto County True-Up", "Florida Power 6/02 EMT Transmission", "Florida Power", "JEA Actual Billing 5/02", "Invoice", "6/02 billing", "8/02 EMT Transmission", "7/02 Transmission", "Walker", and "Power Option Report".

4. Customer-Specific and Vendor-Specific Information

Mr. Gerald Yupp, FPL Energy Marketing and Trading (EMT) Division, Manager of Regulated Wholesale Power Trading, reports staff's working papers contain vendor-specific and customer-specific information including contract prices and other contract information such that release of this information may impair FPL's competitive business interests and its ability to contract on favorable terms. Specifically Mr. Yupp reports this information is reported within working papers; "Reliant Energy", "Confirmation Letter", "Transaction Agreement", "Multi-Hour Deal Form", and "Calculation of Invoice Price".

5. Information concerning "St. Johns River Power Park (SJRPP)", a Jacksonville Electric Authority and Florida Power and Light Venture

Mr. Bruce Wuenker, FPL Accounting Manager, reports the Jacksonville Electric Authority (JEA) maintains certain fuel contract information confidential pursuant to s. 163.01(15)(m), Florida Statutes. This sensitive information pertains to long term contracts with fixed price provisions or short term spot transactions concerning coal and coal supply agreements. These documents are asserted to be confidential by FPL inasmuch as they are "proprietary confidential business information", and in addition, FPL reports the information is particularly sensitive given the reliance upon these fuel contracts by St. Johns River Power Park for generating the electric power supplied to JEA and FPL. Specifically, Mr. Wuenker identifies the staff working paper entitled "SJRPP suspension accrual" as containing this sensitive information.

Staff Analysis of the request (continued)

6. Customer specific information

Damaris Rodriguez, FPL Senior Analyst, reports staff's working papers contain customer-specific account information. Specifically this information is reported in working papers entitled; "Billing History", "Revenue - Rate Code 12", "Revenue - Rate Code 851", "Revenue - RTP."

According to Ms. Rodriguez, "...FPL has a corporate policy not to disclose customer information. This policy includes, but is not limited to: customer names, addresses, telephone numbers, account numbers, rates, billing determinants (kW and kWh usage), conservation savings in kW and kWh, and bills. FPL treats such information as confidential and does not disclose it, except as required by law, to entities or persons other than the customer without the permission of the customer.

FPL's policy is premised upon the customer's right to privacy and the potential that the disclosure of customer specific information may harm some customers' competitive interests or disclose their trade secrets. FPL's customers have affirmed to FPL their interest in having this information maintained confidential. For many of these customers, electric usage is an important part of their production or operating costs. Thus, the disclosure of rate or contract information, as well as consumption levels or patterns, could provide competitors with commercially sensitive information that would afford such competitors an unfair advantage. For, others, non-disclosure of the information is simply a matter of privacy. While it may be that the disclosure of such information may be more sensitive for some customers than for others, FPL has not sought to make a case-by-case determination as to the level of sensitivity or potential harm with respect to disclosing a particular customer's information; rather in deference to its customers, as a matter of policy, and in the interest of customer privacy, FPL has not disclosed to third parties specific rate and contract information of customers unless required by law or unless the customer consents to such disclosure. This policy is important from both a practical and theoretical standpoint. Customers want the assurance that their information is protected to the same extent as any other customer's. Also, practically speaking, it would be a difficult and perhaps impossible task to make a case-by-case determination as to what level of protection each customer's data may merit...."

Staff Analysis of the request (continued)

Also in support of its request that customer-specific account information be granted a confidential classification, FPL reports the following three commission decisions in concurrence with that outcome:

Commission order PSC-98-0421-CFO-EI, dated March 24, 1998, Docket 941102-EI

The decision involves confidential treatment of a quarterly report for a real time pricing program. The order held that customer specific information is regarded as confidential.

Commission order PSC-98-0620-CFO-EI, dated May 4, 1998, Docket 971668-EI

This decision involves confidentiality of customers who filed complaints. The identity of customers who filed a complaint was awarded a confidential classification as long as the complaint was not already a public record.

Commission order 96-1478-CFO-EI, dated December 4, 1996, Docket 961013-EI

The decision involves the identity of customers who have requested studies regarding energy alternatives in their competitive businesses as well as the contents of these studies which identify cost saving measures. The order held that the customer's names and the contents of the studies were confidential.

Staff notes that more recently Commission order PSC-02-1493-CFO-EG, dated October 31, 2002, Docket 020002-EG, specifically granted similar "customer-specific account information" a confidential classification.

7. Internal audit controls and reports of internal auditors and information relating to these reports and controls.

Subsection 366.093(3)(b), F.S., provides that internal auditing controls and reports of internal audits may be granted a confidential classification.

Mr. Rick Del Cueto reports staff working papers identify internal audit controls and reports of internal auditors and information relating to these reports and controls. Mr. Del Cueto specifically identifies the following working papers containing this type of information; "List of Internal Audits", "Transmission Service Request/Billing Review", and "Document Request No. 4".

8. Lastly, FPL witnesses assert all material requested for a confidential classification is held by FPL as confidential and the material has not been released to the public.

Duration of the Confidential Classification Period

FPL goes on to request that this material be returned to the utility once the information is no longer needed for the Commission to conduct its business. However we note the Commission staff's working papers for this type of audit are retained on file by the Commission for 25 years.

According to the provisions of Section 366.093(4), F.S., absent good cause shown, confidential classification is limited to 18 months. Without cause shown for a longer period, we recommend that the period of confidential classification be set as 18 months. As deemed necessary, the utility may request an extension of the confidential classification before the period tolls.

Staff Recommendation

Based upon reading the filing, and for the reasons presented above, we recommend the utility's request be granted and that the identified material be granted a confidential classification for an 18 months.

A detailed recommendation, as found, regarding the material follows:

Detailed Recommendation, As Found

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
9	1	Col C, 1-51	Grant	Internal auditing controls and reports of internal auditors
9	2	Col C, 52-81	Grant	Internal auditing controls and reports of internal auditors
9-1	1-2	2,7-45	Grant	Internal auditing controls and reports of internal auditors
9-1	3	2,7-40	Grant	Internal auditing controls and reports of internal auditors
9-1	4	2,7-43	Grant	Internal auditing controls and reports of internal auditors
9-1	5	2,7-45	Grant	Internal auditing controls and reports of internal auditors

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
9-1	6	2,7-28	Grant	Internal auditing controls and reports of internal auditors
10	1	12-14	Grant	Internal auditing controls and reports of internal auditors
41-2/1-1	1-11, 13-26	2-5; Col B, 8-10,12,15-16,19; Col D, 11-16,19; Cols E-F, 9; Col G, 9-10,14-15,18-19	Grant	Customer-specific account information
41-2/1-1	27	Col A, 3; Col B, 8-18; Col D, 5; Col E, 5,7; Col F, 5,7-12,17	Grant	Customer-specific account information
41-2/1-1	28	2-5 Col B, 8-10,12,15-16,19; Col D, 11-16,19; Cols E-F, 9; Col G, 9-10,14-15,18-19	Grant	Customer-specific account information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
41-2/1-1	29	Col A, 3; Col B, 8-18; Col D, 5; Col E, 5,7; Col F, 5,7-12,17	Grant	Customer-specific account information
41-2/1-1	36-44	1-3; Cols B-C,E-F	Grant	Customer-specific account information
41-2/2	1	2-5; Col B, 8-10,12,15-16,19; Col D, 11-16,19; Cols E-F, 9; Col G, 9-10,14-15,18-19,	Grant	Customer-specific account information
41-2/2	3	2-5; Col B, 8-10,12,15-16,18; Col D, 11-16,18,22-24; Cols E-F, 9; Col G, 9-10,14-15,17-18	Grant	Customer-specific account information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
41-2/2	4-5	2-5; Col B, 8-10,12,15-16,19; Col D 11-16,19,23-25; Cols E-F, 9; Col G, 9-10,14-15,18-19	Grant	Customer-specific account information
41-2/3	1-4	1; Col A, 28; Col B-F	Grant	Customer-specific account information
41-2/4	1	2-4; Cols B-C,E-G	Grant	Customer-specific account information
41-2/4	4	Col A, 2,3; Col B, 2-3,8-13,16-22; Col C, 23-24; Col D, 9-14,16-17; Col E, 24; Col F, 16-20	Grant	Customer-specific account information
41-2/4	5-7	2-4; Cols B-C,E-G		
41-2/4	11	2-4; Cols B-C,E-G		

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 FPL
 Request for Confidential Classification
 2002 Capacity Cost Recovery Clause Audit
 October 28, 2003

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
42-1/1-1	1	Col A, 1-2,7-8; Col B, 2-4; Col C, 2,5-6; Col D, 2; Col E, 2,5-6	Grant	Sensitive contractual and competitive information
42-1/1-1	2	1; Col A, 2,4-8; Col B, 3,7; Col C, 7	Grant	Sensitive contractual and competitive information
42-1/1-1/1	1	1-6; Col B, 10-22	Grant	Sensitive contractual and competitive information
42-1/1-1/1	2	Col B, 1-26	Grant	Sensitive contractual and competitive information
42-1/1-1/1	3	1-3,6,10-16,18-19; Col A, 26; Col B-C, 27	Grant	Sensitive contractual and competitive information
42-1/1-1/1	4	1-4,17; Col A, 19; Col B-C, 20	Grant	Sensitive contractual and competitive information
42-1/1-1/1	5	1-5,8-17,23	Grant	Sensitive contractual and competitive information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
42-1/1-2	1	1; Cols B-C, 2-4; 15-17,25-27;	Grant	Sensitive competitive and contractual information
42-1/1-2	2	Cols A-B, 1-31; 32	Grant	Sensitive competitive and contractual information
42-1/1-3	1	1,3,5-8	Grant	Sensitive competitive and contractual information
42-1/1-3/1	1-9	All	Grant	Sensitive contractual and competitive information
42-1/1-4	2	Col B, 3-4; Col C, 2-4; Col D-E, 6; Col H-I, 5; Col J, 3-4; Col K, 2-4; Col L-M, 6; Col P-Q, 5	Grant	Sensitive competitive and contractual information
42-1/1-4/1	1	Col A, 1; 4-9,13,15	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
42-1/1-4/1-1	1	1; Col B, 13,21-23, 57-59; Col D, 13,15,18-19, 21-23,25,29,33-34, 43-44,47-48,52-53,55, 57-59;	Grant	Bank account information
42-1/1-4/1-1	2	1,4	Grant	Bank account information
42-1/1-4/2	1	Col A, 1-27	Grant	Sensitive competitive information
42-1/1-4/2	2	Col A, 1-18	Grant	Sensitive competitive information
42-1/1-4/2	3	Col A, 1-23	Grant	Sensitive competitive information
42-1/1-5	1	1-5; Col B-C, 7-16; Col D, 6-19; 20-21	Grant	Sensitive competitive and contractual information
42-1/2-1	1	1; Col A-B, 2-5; 17,19,21	Grant	Sensitive competitive and contractual information
42-1/2-1	2	1; Col A-B, 2-33; 34	Grant	Sensitive competitive and contractual information
42-1/2-2	1	1-8	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
42-1/2-3	1	1-11	Grant	Sensitive competitive and contractual information
42-1/2-3/1	1	1-7	Grant	Sensitive competitive information
42-1/2-3/1	2	1,4,12-14	Grant	Sensitive competitive information
42-1/2-3/1	3	1,4	Grant	Sensitive competitive information
42-1/2-4	1	1-2; Col B, 4-7,11-13; Col C, 4-9,11-13; Col D, 4-16; 17-18	Grant	Sensitive competitive and contractual information
42-1/2-4	2	1-2; Col B, 4-7,11-13; Col C, 4-9,11-13; Col D, 4-15; 16-17	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
42-1/2-5	1	Col B, 3-4; Col C, 2-4; Col D-E, 6; Col F-G, 7; Col H-I, 5; Col J, 3-4; Col K, 2-4; Col L-M, 6; Col N-O, 7; Col P-G, 5; 8	Grant	Sensitive competitive and contractual information
42-1/2-5/1	1	Col A, 1-3; Col B, 1-4; 6-8	Grant	Sensitive competitive and contractual information
42-1/2-5/1	2	Col A-B, 1-32; 33	Grant	Sensitive competitive and contractual information
44-1/1-1	1	10-12	Grant	Sensitive competitive information
44-1/1-1/1	1-4	1-4	Grant	Sensitive competitive information
44-1/1-1/2-1/1	1	2,27	Grant	Sensitive competitive information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
44-1/1-1/2-1/1	2	3,8,15,29,34,37,39,44	Grant	Sensitive competitive information
44-1/1-1/2-1/1	3	1,26	Grant	Sensitive competitive information
44-1/1-1/2-1/1	4	3,8,13,20,25,39,44	Grant	Sensitive competitive information
44-1/2-1	1	11-13	Grant	Sensitive competitive information
44-1/2-1/2	1-2	1-3	Grant	Sensitive competitive information
44-1/2-1/2	3	1-4	Grant	Sensitive competitive information
44-2/1	1	All	Grant	Sensitive competitive and contractual information
46-1/1-1	1	Col A, 1-14,21; Col B, 1-14,17-19,21; Col C, 1-14,17-19,21; Col D, 1-14,21; Col G, 11-16,21; Col H, 1-2,6,11-19,21; Col I, 1-2,6,11-21; Col J, 1-2,6;	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
46-1/1-1	2	Col D, 2,6-7,9-11,20-22; Col E, 2,6-7,9-11,13-15, 20-22; Col F-K, 2, 6-7,9-11, 20-22; Col L, 6-7,9-11,13-15, 17-18,20-22,24,28-31;	Grant	Sensitive competitive and contractual information
46-1/1-1/1	1	1-2,5-8	Grant	Sensitive competitive and contractual information
46-1/1-1/1	2	Col B, 1-6	Grant	Sensitive competitive and contractual information
46-1/1-2	1	Col A, 1,3,5; Cols B-D, 3,17-27,29; Cols E-I, 17-27,29	Grant	Sensitive competitive and contractual information
46-1/1-2	2	Cols, A-F, 1-11,14	Grant	Sensitive competitive and contractual information
46-1/1-2/1	1	Col A, 1-9; 10	Grant	Sensitive competitive and contractual information
46-1/1-2/1	2	Col A, 1-9	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
46-1/1-3	1	Col A, 3,5,7; Cols B-C, 5, 19-29; Col D, 3,5,19-29; Col E, 1,3-7,19-29; Col F, 1,4,19-29; Col G, 5,19-29; Col H-L, 19-29	Grant	Sensitive competitive and contractual information
46-1/1-3	2	Cols A-E, 1 Cols F-K, 1,13-24,26; 28-29	Grant	Sensitive competitive and contractual information
46-1/1-4	1	Col A, 3; Col B-D	Grant	Sensitive competitive and contractual information
46-1/1-4	2	Col A-B; Col C, 1-10,19-20; Col D	Grant	Sensitive competitive and contractual information
46-1/2-1	1	Cols A-C, 1; Col D-G, 1,13-22,25; Col H, 1	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
46-1/2-1	2	Col A-B,D, 3-19,22,24; Col F, 18-22,24; Col G, 3-6,8,18-22,24; Col H, 3-6,8	Grant	Sensitive competitive and contractual information
46-1/2-1/1	1	Col B, 2,6; Col C, 2,4,18-27; Col D, 1-4,6,18-27; Col E, 1,3,18-27; Cols F-H, 18-27; Col I, 18-27,29;	Grant	Sensitive competitive and contractual information
46-1/2-1/1	2	Col A, 1-6	Grant	Sensitive competitive and contractual information
46-1/2-2	1	Col A-C; Col D, 14	Grant	Sensitive competitive and contractual information
46-1/2-2	2	Col B, 3-12; Col C, 1-12,16-17; Col D, 3-15	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
46-1/2-3	1	Col A, 4,6,9; Cols B-C, 6, 19-30; Col D, 4,6,19-30; Col E, 3-9,19-30; Col F, 3,5,19-30; Col G, 6,19-30; Col H-L, 19-30	Grant	Sensitive competitive and contractual information
46-1/2-3	2	Cols A-E, 1; Cols F-K, 1-13,16; 17	Grant	Sensitive competitive and contractual information
46-1/2-3/1	1	Col A, 1-5,7-8; 9	Grant	Sensitive competitive and contractual information
46-1/2-4	1	Col A-B; Col C, 1,9,11	Grant	Sensitive competitive and contractual information
46-1/2-4	2	Col B; Col C, 1-12,15-16; Col D	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
47-1/1-4/1-1	1	1; Col A, 2-3; Cols B-C, 3; 4 Cols D-H, 5-8; Cols, I-J, 5-8,11; Cols, K-L, 20; Col M, 16; Col N, 16-17,22; Cols O-P, 20	Grant	Sensitive competitive and contractual information
47-1/1-4/1-2	1	1; Col A, 2-28,32-33; Cols B-D	Grant	Sensitive competitive and contractual information
47-1/1-4/1-2	2-3	1; Cols A-D	Grant	Sensitive competitive and contractual information
47-1/1-4/1-2	4	1-6; Col A, 8; Col B, 7; Col C, 7,9	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
47-1/1-4/1-2/1	1	Cols A, 3-32; Col B, 1; Col C, 2; Cols D-E, 3-32	Grant	Sensitive competitive information
47-1/1-4/1-2/2	1	2,3	Grant	Sensitive competitive information
47-1/1-4/1-2/2	2	Cols A-B, 1-4; Col C, 1-5; Col D, 1-4; Cols E-F, 1-5; Cols H-I, 1-4	Grant	Sensitive competitive information
47-3/1	1	Cols A-B, 2,4,6,8,11-12; Col C, 2,4,6,8,11-12, 15-17; Col D, 1-14; Col E, 2,4,6,8,11-12; Col G, 1-14; Col I, 1-10	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
47-3/1	2	1-5; Col A, 7; Col B, 6; Col C, 6,8	Grant	Sensitive competitive and contractual information
47-3/1	3	1; Col A, 2; Col B, 2-4,7-8; Col C, 2,5-6; Col D, 2 Col E, 2,5-6	Grant	Sensitive competitive and contractual information
47-3/1	4	Cols, A,D,E, 1-2,6-7, 11-12,15-16; Col G, 1-4,6-9,11-13, 15-18 ; Col H, 1-2,6-7,11-12, 15-16; Col J, 1-4,6-9,11-13, 15-18	Grant	Sensitive competitive and contractual information
47-3/1	5	1-5; Col A, 7; Col C, 6; Col D, 6,8-11	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
47-3/1	6	1; Col A, 2,5; Col B, 2-7,10-11; Col C, 2,5,8-9; Col D, 2,5; Col E, 2,5,8-9	Grant	Sensitive competitive and contractual information
47-3/2	1	Cols A,D,E, 1-2,6-7, 11-12,15-16; Col G, 1-4,6-9,11-13, 15-18; Col H, 1-2,6-7,11-12, 15-16; Col J, 1-4,6-9,11-13, 15-18;	Grant	Sensitive competitive and contractual information
47-3/2	2	1-5; Col A, 7; Col C, 6; Col D, 6,8-11	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
47-3/2	3	1; Col A, 2,5; Col B, 2-7,10-11; Col C, 2,5,8-9; Col D, 2,5; Col E, 2,5,8-9	Grant	Sensitive competitive and contractual information
47-3/3	1	Col A,D,E, 2-3,5-6,8, 10-11,13; Col G, 2-16; Col H, 2-3,5-6,8,10-11, 13; Col J, 2-16; Col L, 16	Grant	Sensitive competitive and contractual information
47-3/3	2	1-6; Col A, 8; Col C, 7; Col D, 7,9,10-12	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
47-3/3	3	1; Col A, 2; Col B, 2-4,7-8; Col C, 2,5-6; Col D, 2; Col E, 2,5,6	Grant	Sensitive competitive and contractual information
47-3/4	1	Col A,D,E, 1-2,4-5,7, 9-10,12; Col G, 1-15; Col H, 1-2,4-5,7,9-10,12; Col J, 1-15; Col L, 15	Grant	Sensitive competitive and contractual information
47-3/4	2	1-6; Col A, 8; Col C, 7; Col D, 7,9; 10-12	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
47-3/4	3	1; Col A, 2; Col B, 2-4,7-8; Col C, 2,5-6; Col D, 2; Col E, 2,5-6	Grant	Sensitive competitive and contractual information
47-3/5	1	Cols, A,D,E, 1-2,4-5,7, 9-10,12; Col G, 1-15; Col H, 1-2,4-5,7,9-10,12; Col J, 1-15 Col L, 15	Grant	Sensitive competitive and contractual information
47-3/5	2	1-6; Col A, 8-13; Col B, 14; Col C-D, 7,9,11; 15-17	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
47-3/5	3	1; Col A, 2-4,7-8; Col B, 2,5-6; Col C, 2; Col D, 2,5-6	Grant	Sensitive competitive and contractual information
47-3/6	1	Col A,D,E, 1-2,4-5,7, 9-10,12; Col G, 1-15; Col H, 1-2,4-5,7,9-10,12; Col J, 1-15; Col L, 15	Grant	Sensitive competitive and contractual information
47-3/6	2	1-6; Col A, 8-13; Col B, 14; Col C, 7,9,11; Col D, 7,9,11,15-17	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06094-03				
47-3/6	3	1; Col A, 2; Col B, 2-4,7-8; Col C, 2,5-6; Col D, 2; Col E, 2,5-6	Grant	Sensitive competitive and contractual information
47-3/7	1	Cols A,D,E, 1-2,4-5,7, 9-10,12; Col G, 1-15; Col H, 1-2,4-5,7,9-10,12; Col J, 1-15; Col L, 15	Grant	Sensitive competitive and contractual information
47-3/7	2	1-6; Col A, 8-9; Col C, 7; Col D, 7,10	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
47-3/7	3	1; Col A, 2; Col B, 2-4,7-8; Col C, 2,5-6; Col D, 2; Col E, 2,5-6	Grant	Sensitive competitive and contractual information
Documents 05786-03 and 06256-03				
44-1/1	1-2	All	Grant	Sensitive competitive information
44-1/1-2/1-1	2	Col A, 8-11	Grant	Sensitive competitive information
44-1/2	1-2	All	Grant	Sensitive competitive information
44-1/3-1	2	Col A, 7-11	Grant	Sensitive competitive information
44-1/3-2	2	Col A, 7-11	Grant	Sensitive competitive information
44-1/3-3	1	Col A, 7-10	Grant	Sensitive competitive information
44-1/3-4	1	Col A, 7-10	Grant	Sensitive competitive information
47-1/1	1	All	Grant	Sensitive competitive information
47-2/2	1	All	Grant	Sensitive competitive information
48-1/1	1-12	All	Grant	Sensitive competitive information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 05786-03 and 06256-03				
48-1/2	1-12	All	Grant	Sensitive competitive information

A temporary copy of this recommendation will be held at I:06094-03&06256-03.fpl.raf.wpd for a short period.

CC: Division of Auditing and Safety (Welch)
Division of Commission Clerk and Administrative Services (Flynn)