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DATE: August 12, 2008

TO: Lisa Bennett, Attorney, Office of General Counsel

FROM: Division of Regulatory Compliance and Consumer Assistance (Freeman, Vandiver) F W

RE: Docket 080001-EI, Recommendation concerning Florida Power & Light Company's (FPL's) request for confidential classification concerning a portion of the staff audit working papers prepared during "Florida Power & Light Fuel Cost Recovery Clause Audit for the Year Ended December 31, 2007", Audit Control No. 08-003-4-2, Documents Numbered 03913-08, 03914-08, 03915-08, and 04588-08

On May 8, 2008, when copies of certain portions of staff's audit working papers obtained or prepared during the "Florida Power & Light Fuel Cost Recovery Clause Audit for the Year Ended December 31, 2007", were delivered to FPL at the audit exit conference, the utility requested that these materials be temporarily exempted from public access in accordance with provisions of Rule 25-22.006(3)(a)2., Florida Administrative Code (FAC).

On May 12, 2008, staff filed documents numbered 03913-08, 03914-08 and 03915-08 consisting of those specified portions of the staff's audit report and working papers.

On May 29, 2008, FPL filed a request pursuant to Section 366.093, Florida Statutes (F.S) and Rule 25-22.006, FAC, that selected portions of the working papers prepared by the staff during the audit receive a confidential classification. The utility's request included redacted copies for public inspection (Document No. 04589-08) and copies with the sensitive material highlighted (Document No. 04588-08).

On July 9, 2008, after discussions with the staff, FPL made technical corrections to its filing, resolved minor items, and filed a revised listing of sensitive information by page and line.

Documents numbered 03913-08, 03914-08, 03915-08, and 04588-08, are currently held by the Office of the Commission Clerk as confidential pending resolution of FPL's request for confidential classification.

- COM _____
- ECR _____
- GCL _____
- OPC _____
- RCP _____
- SSC _____
- SGA _____
- ADM _____
- CLK *Marguerite*

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., provide the following exemptions.

DOCUMENT NUMBER-DATE

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Subsection 366.093(3), 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 the 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 or services on favorable terms.

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

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 Utility Request

Reading the filing reveals the sensitive material consists of:

- 1) Excerpts from Board of Directors’ Meeting Minutes

Alissa E. Ballot, Vice President & Corporate Secretary of FPL Group, Inc. (“FPL Group”) and Vice President & Corporate Secretary of Florida Power & Light Company (“FPL”) identifies excerpts from Board of Directors’ meeting minutes, the disclosure of which would impair the competitive businesses of FPL and FPL Group. Working papers identified as sensitive by Ms. Ballot are: “Board of Directors”; “Committee Minutes”, and “Committees”.

Section 366.093(3)(e), F.S., provides that the Commission may grant a confidential classification to sensitive competitive business information if release of that information would impair the competitive business of the provider of that information.

Staff Analysis of the Utility Request (Continued)

- 2) Material reporting internal auditing controls, reports of internal auditors or related information

Witness Robert Onsgard, FPL Manager, Internal Auditing, identifies sensitive material reporting internal auditing controls, reports of internal auditors and related information. Witness Onsgard identifies materials reporting sensitive internal auditing information disclosed in working papers titled: "List of Internal Audits" and "Internal Audits."

Section 366.093(3)(b), F.S., provides that the Commission may grant a confidential classification to information reporting internal auditing controls and reports of internal auditors.

- 3) Information reporting information obtained from FPL's external auditor.

Witness H. Antonio Cuba, Director Regulatory Accounting, identifies sensitive competitive business information obtained from FPL's external auditor disclosed in the working papers titled: "External Audits."

While witness Cuba refers to the information as taken from FPL's internal auditor, the information is actually from FPL's external auditor. Information taken from the external auditor is not considered information taken from the internal auditor. While information collected and reported upon by the internal auditor is based upon investigations directed by company management into company programs, information collected by the external auditor is collected by a third party auditor in order to render an opinion if the financial statements fairly present the operations of their client. Section 366.093(3)(b), F.S., provides an exemption for material from the internal auditor, but is silent concerning the materials of the external auditor.

Commission Order 25297, issued November 11, 1991, in Docket No. 890190 and affirmed by Commission Order No. PSC-92-0135-FOF-TL, issued March 31, 1992, in docket No. 890190-TL provides the guidelines for assessing if information obtained from an external auditor should be granted a confidential classification. These orders provide that a confidential classification may be granted to the valuable proprietary audit strategy and work program methodology which are unique to that external auditor on the basis that disclosing this information would harm the competitive business of that external auditor.

We have read the information in question and find that the information reports the proprietary audit strategy and work program of FPL's external auditor. Therefore, we recommend that this information from an external auditor be granted a confidential classification based upon the exclusion set out by Section 366.093(3)(e), F.S., in that the information is unique to that external auditor and its release would harm the competitive business of that auditor.

Staff Analysis of the Utility Request (Continued)

4) Business information pertaining to negotiated agreements for services of FPL facilities

Witness Terry O. Jones, FPL Vice President of Nuclear Plant Support in the Nuclear Business Unit, identifies working papers titled "Fuel Adjustment" and "DOE Quarterly Payment" as containing sensitive contractual information pertaining to services of FPL facilities.

Witness Jones asserts: "This information, if made public, would disclose certain procedures to the detriment of FPL and its customers, and would impair FPL's efforts to enter into contracts on commercially favorable terms....." Section 366.093(3)(d), F.S., provides the Commission may grant a confidential classification to sensitive contractual information if its release would impair the ability of the public utility or its affiliates to contract on favorable terms. Reading the information identified by Witness Jones reveals its is of a sensitive contractual nature and its release would reasonably impair the contracting ability of this utility company.

5) Customer-specific account information, including banking account numbers

Witness Terry J. Keith, FPL Director of Cost Recovery Clauses in the Regulatory Affairs Department, identifies working papers titled: "Revenue" as reporting sensitive information concerning customer-specific account information. Witness Keith reports: "...It is FPL's corporate policy not to disclose customer specific 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 kWh and bills. FPL treats such information as confidential and does not disclose it, except as provided by law, to entities or persons other than the customer absent the customer's consent...."

The Commission policy is to grant customer-specific account information a confidential classification on the basis that the information is sensitive competitive business information the release of which would harm the provider of that information. (See Commission Order No. 22851, issued April 23, 1990, in docket No. 890974-EI.)

After reading the material identified by witness Keith we find the information is customer-specific account information, and therefore, we recommend that the material be granted a confidential classification.

Staff Analysis of the Utility Request (Continued)

- 6) Contractual data such as pricing and other terms, payment records, and vendor and supplier rates

Witness Gerard J. Yupp, FPL Director of Wholesale Operations in the Energy Marketing and Trading Division, points out materials which are identified as contractually sensitive in staff's working papers titled: "Sample [of Tested Transactions]", "True Up", "Invoice", "Gas Adjustments", "Form 423", "Lambda", "Nuclear Power Entry", "Purchased Power", "Gas Burn", "Gas Transmission", "Coal Adjustment", and "Bay Gas."

Witness Yupp also identifies materials which are identified as both sensitive competitive business information and contractual information within staff's working papers titled: "Sample [of Tested Transactions]", "Natural Gas Consumption", "Inventory Report", "Gas Burn", "Gas Transmission", "L-T [Long Term] Purchases", "Coal Inventory", "Bay Gas."

Lastly, witness Yupp identifies contractual fuel data which is identified as sensitive competitive business information within staff's working papers titled: "Sample [of Tested Transactions]", "Gas Turbine Fire Up", "Coal Inventory", and "Vendor Rebates."

As justification for why the material is sensitive contractual information, witness Yupp asserts: "The documents that I have reviewed...contain or constitute contractual data such as pricing and other terms, payment records, and vendor and supplier rates, the disclosure of which would impair the efforts of FPL to contract for gas, [coal] and oil procurement on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain of the information would also place FPL at a disadvantage when coupled with other information that is publicly available...."

Section 366.093(3)(d), F.S. provides that the Commission may grant a confidential classification to contractual information if its release would impair the ability of the public utility or its affiliates to contract for goods and services. Section 366.093(3)(e), F.S., provides material may be granted a confidential classification if the material is competitively sensitive such that its release would harm the competitive business of the provider of the information. We have read the sensitive information and find that its release would reasonably cause the harm the utility suggests. Therefore, we recommend that the information identified by witness Yupp be granted a confidential classification.

Staff Analysis of the Utility Request (Continued)

7) Oil financial instruments, fuel status and inventory reports

Witness Martin A. Garmendia, FPL Accounting Manager, Property Accounting Reporting and Analysis, identifies sensitive contractual information reported within staff working papers titled; "Sample [of Tested Transactions], and "Fuel Inventory". Mr. Garmendia reports the identified information is proprietary confidential business information. Further in FPL's pleading, the utility asserts all of the information identified is proprietary confidential business information within the meaning of Section 366.093(3), F.S. FPL's pleading also asserts the information identified by Mr. Garmendia is sensitive contractual information.

As provided by the exemption set out by Section 366.093(3)(d), F.S., the Commission may grant a confidential classification to sensitive contractual materials if its release would impair the ability of the utility or its affiliates to contract on favorable terms for goods and services. After reading the material identified by Mr. Garmendia, we agree release of this material would reasonably cause the harm the utility suggests; therefore, we recommend that this material be granted a confidential classification.

8) Information concerning Indiantown Cogeneration Limited (ICL) and certain qualifying facilities

Witness Osvaldo J. Lom, FPL Supervisor of Purchased Power Contracts, identifies contractually sensitive information contained within staff working papers titled: "QF [Qualifying Facilities]." Further, witness Lom identifies sensitive competitive business information contained within a staff working paper titled: "Purchased Power." Witness Lom asserts that if this sensitive data was disclosed FPL would be placed at a competitive disadvantage. Witness Lom also asserts that ICL and those facilities maintain this information as confidential and disclosure of this information would injure FPL, ICL and those facilities in the marketplace.

Section 366.093(3)(d), F.S. provides that the Commission may grant a confidential classification to contractual information if its release would injure the ability of FPL or its affiliates to contract favorably for goods and services. Section 366.093(3)(e), F.S., provides material may be granted a confidential classification if the material is competitively sensitive such that its release would harm the competitive business of the provider of the information. We have read the identified information and agree with FPL that release of this information would reasonably cause the harm FPL suggests; therefore, we recommend that this information be granted a confidential classification.

Staff Analysis of the Utility Request (Continued)

9) Competitively sensitive transmission service data

Witness Robert A. Birch, FPL Manager of System Operation and Transmission Billing, identifies sensitive contractual information included within working paper titled "Transmission Service."

Section 366.093(3)(d), F.S., provides that the Commission may grant a confidential classification to sensitive contractual information if its release would impair the ability of a utility or its affiliates to contract on a favorable basis for goods and services. Reading the information identified by witnesses Birch reveals it is sensitive contractual information release of which would impair the ability of FPL and its affiliates to contract favorably. Therefore, we recommend that this information be granted a confidential classification.

Information Held as Confidential

To qualify as proprietary confidential business information, the material must also be held as private and not released to the public. FPL asserts that this sensitive information meets the statutory restrictions necessary for the material to be provided a confidential classification, and asserts that the information has not been disclosed to the Public. Further, FPL witnesses report FPL has maintained the confidentiality of these materials.

Duration of the Confidential Classification Period

FPL and FPL witnesses request that this material be held as confidential for at least 18 months and that this material should be returned to FPL once the information is no longer needed for the Commission to conduct its business.

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 18 months.

A detailed recommendation, as found, follows:

Detailed Recommendation, As Found

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 03913-08 and 04588-08					
8	Board of Directors	1-4	All	Grant	Sensitive Competitive Business Information
8-2	Committee Minutes	1-2	All	Grant	Sensitive Competitive Business Information
8-3	Committees	1	All	Grant	Sensitive Competitive Business Information
9	List of Internal Audits	1	Col. B	Grant	Internal Auditing Controls and Reports of Internal Auditors
9-1	Internal Audits	1-7	All	Grant	Internal Auditing Controls and Reports of Internal Auditors
9-2	External Audits	1-15	All	Grant	Sensitive Competitive Business Information
12-3/1	Fuel Adjustment	1	All	Grant	Sensitive Contractual Information
12-3/2	Fuel Adjustment	2	Cols. AA,C-D	Grant	Sensitive Contractual Information
41-1/1-2	Revenue	1-3	Col. 1	Grant	Sensitive Competitive Business Information
41-1/1-2/1	Revenue	1	4,10	Grant	Sensitive Competitive Business Information
41-1/1-3	Revenue	1-3	Col. 1	Grant	Sensitive Competitive Business Information
41-1/1-4	Revenue	1-2	Col. 1	Grant	Sensitive Competitive Business Information
41-1/1-5	Revenue	1-3	Col. 1	Grant	Sensitive Competitive Business Information
41-1/1-6	Revenue	1-3	Col. 1	Grant	Sensitive Competitive Business Information
41-1/1-7	Revenue	1-3	Col. 1	Grant	Sensitive Competitive Business Information
41-1/1-8	Revenue	1	1; Cols. A-F	Grant	Sensitive Competitive Business Information
41-1/1-9	Revenue	1-3	Col. 1	Grant	Sensitive Competitive Business Information
41-1/1-10	Revenue	1	1; Cols. A-F	Grant	Sensitive Competitive Business Information
43-2/2-1	Sample	1	Cols. A-C	Grant	Sensitive Contractual and Competitive Business Information
43-2/2-1	Sample	2	Cols. A-B	Grant	Sensitive Contractual and Competitive Business Information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 03913-08 and 04588-08					
43-2/2-2	Sample	1	Cols. A-B	Grant	Sensitive Contractual Information
43-2/2-2/1	Sample	1	Cols. A-I	Grant	Sensitive Contractual Information
43-2/2-2/2	Sample	1	Cols. A-D	Grant	Sensitive Contractual Information
43-2/2-2/2	Sample	2	3; Cols. A-B	Grant	Sensitive Contractual Information
43-2/2-2/3	Sample	1	Cols. A-H	Grant	Sensitive Contractual Information
43-2/2-2/4	Sample	1	Cols. A-H	Grant	Sensitive Contractual Information
43-2/2-3	Sample	1-3	Cols. A-B	Grant	Sensitive Contractual Information
43-2/2-3/1	Sample	1-3	Cols. A-G	Grant	Sensitive Contractual Information
43-2/2-3/2	Sample	1	3; Cols. A-D	Grant	Sensitive Contractual Information
43-2/2-3/2	Sample	2	3	Grant	Sensitive Contractual Information
43-2/2-3/3	Sample	1-2	Cols. A-G	Grant	Sensitive Contractual Information
43-2/2-3/4	Sample	1	Cols. A-H	Grant	Sensitive Contractual Information
43-2/2-4	Sample	1	Cols. A-B	Grant	Sensitive Contractual Information
43-2/2-4/1	Sample	1	1-6	Grant	Sensitive Contractual Information
43-2/2-4/1	Sample	2	Cols. A-J	Grant	Sensitive Contractual Information
43-2/2-4/2	Sample	1-3	3; Cols. A-D	Grant	Sensitive Contractual Information
43-2/2-4/3	Sample	1-2	Cols. A-H	Grant	Sensitive Contractual Information
43-2/2-4/3	Sample	3	Cols. A-G	Grant	Sensitive Contractual Information
43-2/2-4/4	Sample	1	Cols. A-I	Grant	Sensitive Contractual Information
43-2/2-5	Sample	1	Cols. A-B	Grant	Sensitive Contractual Information
43-2/2-5/1	Sample	1	Cols. A-E	Grant	Sensitive Contractual Information
43-2/2-5/1	Sample	2-3	Cols. A-D	Grant	Sensitive Contractual Information
43-2/2-5/2	Sample	1-2	Cols. A-D	Grant	Sensitive Contractual Information
43-2/2-5/2	Sample	3	3	Grant	Sensitive Contractual Information
43-2/2-5/3	Sample	1	Cols. A-F	Grant	Sensitive Contractual Information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 03913-08 and 04588-08					
43-2/2-5/3	Sample	2	Cols. A-E	Grant	Sensitive Contractual Information
43-2/2-5/4	Sample	1	Cols. A-I	Grant	Sensitive Contractual Information
43-2/2-6	Sample	1-2	Cols. A-B	Grant	Sensitive Contractual Information
43-2/2-6/1	Sample	1	11; Cols. A-I	Grant	Sensitive Contractual Information
43-2/2-6/2	Sample	1	1-7; Cols. A-B	Grant	Sensitive Contractual Information
43-2/2-6/2	Sample	2	Cols. A-D	Grant	Sensitive Contractual Information
43-2/2-6/3	Sample	1	Cols. A-H	Grant	Sensitive Contractual Information
43-2/2-6/4	Sample	1	Cols. A-C	Grant	Sensitive Contractual Information
43-2/2-7	Sample	1-2	Cols. A-B	Grant	Sensitive Contractual Information
43-2/2-7/1	Sample	1	Cols. A-I	Grant	Sensitive Contractual Information
43-2/2-7/2	Sample	1	Cols. A-C	Grant	Sensitive Contractual Information
43-2/2-7/2	Sample	2	Cols. A-B	Grant	Sensitive Contractual Information
43-2/2-7/2	Sample	3-4	Cols. A-I	Grant	Sensitive Contractual Information
43-2/2-8	Sample	1	Cols. A-B	Grant	Sensitive Contractual Information
43-2/2-8/1	Sample	1	Cols. A-E	Grant	Sensitive Contractual Information
43-2/2-8/2	Sample	1	Cols. A-D	Grant	Sensitive Contractual Information
43-2/2-8/2	Sample	2	3; Cols. A-D	Grant	Sensitive Contractual Information
43-2/2-8/3	Sample	1-2	Cols. A-G	Grant	Sensitive Contractual Information
43-2/2-8/4	Sample	1	Cols. A-J	Grant	Sensitive Contractual Information
43-2/2-9	True-Up	1	1-5; Cols. A-D	Grant	Sensitive Contractual Information
43-2/2-9	True-Up	2	Cols. A-F	Grant	Sensitive Contractual Information
43-2/2-9	True-Up	3	Col. A	Grant	Sensitive Contractual Information
43-2/2-9/1	True-Up	1	Cols. A-C	Grant	Sensitive Contractual Information
43-2/3	Sample	3	Col. A	Grant	Sensitive Contractual Information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 03913-08 and 04588-08					
43-2/3-1	Sample	1	Cols. A-C	Grant	Sensitive Contractual and Competitive Business Information
43-2/3-1	Sample	2	Cols. A-B	Grant	Sensitive Contractual and Competitive Business Information
43-2/3-2	Sample	1	Cols. A-C	Grant	Sensitive Contractual Information
43-2/3-2/1	Sample	1	Cols. A-J	Grant	Sensitive Contractual Information
43-2/3-2/1-1	Sample	1-2	Cols. A-K	Grant	Sensitive Contractual Information
43-2/3-2/1-1	Sample	3	7	Grant	Sensitive Contractual Information
43-2/3-2/1-1	Sample	4	Cols. A-G	Grant	Sensitive Contractual Information
43-2/3-2/1-1	Sample	5	Cols. A-F	Grant	Sensitive Contractual Information
43-2/3-2/2	Sample	1-2	3; Cols. A-D	Grant	Sensitive Contractual Information
43-2/3-2/2	Sample	3	3	Grant	Sensitive Contractual Information
43-2/3-2/3	Sample	1-2	Cols. A-H	Grant	Sensitive Contractual Information
43-2/3-2/4	Sample	1	Cols. A-I	Grant	Sensitive Contractual Information
43-2/3-3	Sample	1	Cols. A-C	Grant	Sensitive Contractual Information
43-2/3-3/1	Sample	1-2	Cols. A-E	Grant	Sensitive Contractual Information
43-2/3-3/2	Sample	1-2	3; Cols. A-D	Grant	Sensitive Contractual Information
43-2/3-3/3	Sample	1	Cols. A-G	Grant	Sensitive Contractual Information
43-2/3-3/4	Sample	1	Cols. A-I	Grant	Sensitive Contractual Information
43-2/3-4	Sample	1-2	Cols. A-B	Grant	Sensitive Contractual Information
43-2/3-4/1	Sample	1	Cols. A-K	Grant	Sensitive Contractual Information
43-2/3-4/1	Sample	2	Col. A	Grant	Sensitive Contractual Information
43-2/3-4/1	Sample	3	Cols. A-H	Grant	Sensitive Contractual Information
43-2/3-4/2	Sample	1-4	3; Cols. A-D	Grant	Sensitive Contractual Information
43-2/3-4/2-1	Sample	1	Cols. A-C	Grant	Sensitive Contractual Information
43-2/3-4/3	Sample	1	Cols. A-F	Grant	Sensitive Contractual Information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 03913-08 and 04588-08					
43-2/3-4/3	Sample	2-3	Cols. A-G	Grant	Sensitive Contractual Information
43-2/3-4/4	Sample	1	Cols. A-E	Grant	Sensitive Contractual Information
43-2/3-4/4	Sample	2	Cols. A-P	Grant	Sensitive Contractual Information
43-2/3-4/4	Sample	3	Cols. A-Q	Grant	Sensitive Contractual Information
43-2/3-4/4	Sample	4	Cols. A-I	Grant	Sensitive Contractual Information
43-2/3-5	Sample	1	Cols. A-B	Grant	Sensitive Contractual Information
43-2/3-5/1	Sample	1	Cols. A-J	Grant	Sensitive Contractual Information
43-2/3-5/2	Sample	1	Cols. A-D	Grant	Sensitive Contractual Information
43-2/3-5/3	Sample	1	Cols. A-H	Grant	Sensitive Contractual Information
43-2/3-5/4	Sample	1	Cols. A-I	Grant	Sensitive Contractual Information
43-2/3-6	Sample	1	Cols. A-B	Grant	Sensitive Contractual Information
43-2/3-6/1	Sample	1	Cols. A-E	Grant	Sensitive Contractual Information
43-2/3-6/1-1	Sample	1	3: Cols. A-D	Grant	Sensitive Contractual Information
43-2/3-6/2	Sample	1	Col. A	Grant	Sensitive Contractual Information
43-2/3-7	True-Up	1	Cols. A-G	Grant	Sensitive Contractual Information
43-2/3-7	Sample	2	3,5,7,11,20,22,24,26,29	Grant	Sensitive Contractual Information
Documents Numbered 03914-08 and 04588-08					
43-3/2	Sample	2	Cols. A-B	Grant	Sensitive Contractual Information
43-3/2-1	Sample	1	Cols. A-C	Grant	Sensitive Contractual Information
43-3/2-1/1	Sample	1-9	All	Grant	Sensitive Contractual Information
43-3/2-2	Sample	1-5	All	Grant	Sensitive Contractual Information
43-2/3-1	Sample	1	9-21	Grant	Sensitive Contractual Information
43-3/5	Sample	2	Cols. A-B	Grant	Sensitive Contractual Information
43-3/5-1	Sample	1	Cols. A-C	Grant	Sensitive Competitive Business Information
43-3/5-1/1	Sample	1-12	All	Grant	Sensitive Contractual Information
43-3/5-2	Sample	1-5	All	Grant	Sensitive Contractual Information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 03914-08 and 04588-08					
44-1/1-1/1	Natural Gas Consumption	1	Cols. A-C	Grant	Sensitive Contractual and Competitive Business Information
44-1/1-1/1	Natural Gas Consumption	2	Cols. A-B	Grant	Sensitive Contractual and Competitive Business Information
44-1/1-1/3	Gas Adjustments	1	Cols. A-B	Grant	Sensitive Contractual Information
44-1/1-1/3	Gas Adjustments	2	Cols. A-C	Grant	Sensitive Contractual Information
44-1/1-1/4	Gas Adjustments	1	6,19,21	Grant	Sensitive Contractual Information
44-1/1-1/4	Gas Adjustments	2	Cols. A-B	Grant	Sensitive Contractual Information
44-1/1-1/4-1	Gas Adjustments	1	1-5	Grant	Sensitive Contractual Information
44-1/1-1/4-1	Gas Adjustments	2	16,20,23	Grant	Sensitive Contractual Information
44-1/1-1/4-1	Gas Adjustments	3	22-28	Grant	Sensitive Contractual Information
44-1/1-1/5	Gas Adjustments	1	Cols. A-J	Grant	Sensitive Contractual Information
44-1/1-1/5	Gas Adjustments	2	Cols. A-I	Grant	Sensitive Contractual Information
44-1/1-1/6	Gas Adjustments	1	Cols. A-I	Grant	Sensitive Contractual Information
44-1/1-1/6	Gas Adjustments	2	Cols. A-D	Grant	Sensitive Contractual Information
44-3	Fuel Inventory	1-2	Cols. A-F	Grant	Sensitive Contractual Information
44-3/2	Fuel Inventory	1-4	Cols. A-D	Grant	Sensitive Contractual Information
44-3/2	Fuel Inventory	5-23	Cols. A-B	Grant	Sensitive Contractual Information
44-3/2	Fuel Inventory	25-28	Cols. A-B	Grant	Sensitive Contractual Information
44-1/1	Fuel Inventory	1-2	Cols. A-F	Grant	Sensitive Contractual Information
45-1/1-1	Form 423	1-2	Cols. A-K	Grant	Sensitive Contractual Information
45-1/1-2	Inventory Report	1	Cols. A-M	Grant	Sensitive Contractual and Competitive Business Information
45-2/1-1	Form 423	1-2	Cols. A-K	Grant	Sensitive Contractual Information
45-2/1-2	Inventory Report	1	Cols. A-M	Grant	Sensitive Contractual and Competitive Business Information
46-1/2	Lambda	1-2	Cols. A-H	Grant	Sensitive Contractual Information
46-1/2-2	Nucleus Power Entry	1-2	1-24	Grant	Sensitive Contractual Information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 03914-08 and 04588-08					
46-1/2-2	Nucleus Power Entry	3	1-26	Grant	Sensitive Contractual Information
46-1/2-2	Nucleus Power Entry	4	1-24	Grant	Sensitive Contractual Information
46-3	Gas Turbine True-Up	1	12-13	Grant	Sensitive Competitive Business Information
46-3	Gas Turbine True-Up	3	Cols. A-C	Grant	Sensitive Competitive Business Information
46-3	Gas Turbine True-Up	4-5	Cols. A-D	Grant	Sensitive Competitive Business Information
46-3	Gas Turbine True-Up	6	Cols. A-F	Grant	Sensitive Competitive Business Information
46-3	Gas Turbine True-Up	7	Cols. A-D	Grant	Sensitive Competitive Business Information
47-1/1	Purchased Power	1	1-7	Grant	Sensitive Competitive Business Information
47-1/1-1	Purchased Power	1	1-7	Grant	Sensitive Competitive Business Information
47-1/1-1/1	Purchased Power	1	A-B	Grant	Sensitive Contractual Information
47-1/1-1/1-1	Gas Burn	1	Cols. A-I	Grant	Sensitive Contractual Information
47-1/1-1/1-1	Gas Burn	2	Cols. A-J	Grant	Sensitive Contractual Information
47-1/1-1/1-1/1	Gas Burn	1	Cols. A-T	Grant	Sensitive Contractual Information
47-1/1-1/1-1/1	Gas Burn	2	Cols. A-H	Grant	Sensitive Contractual Information
47-1/1-1/1-1/3	Gas Transmission	1	Cols A-G	Grant	Sensitive Contractual Information
47-1/1-1/1-1/4	Gas Burn	1	Cols. A-D	Grant	Sensitive Contractual Information
47-1/1-1/1-1/5	Gas Burn	1	Cols. A-K	Grant	Sensitive Contractual Information
47-1/1-1/1-1/6	Gas Burn	1	Cols. A-F	Grant	Sensitive Contractual and Competitive Business Information
47-1/1-1/1-1/6	Gas Burn	2	2-3; Col. A	Grant	Sensitive Contractual and Competitive Business Information
47-1/1-1/1-2	Gas Transmission	1	Cols. A-E	Grant	Sensitive Contractual and Competitive Business Information
47-1/1-1/1-2	Gas Transmission	2	Cols. A-D	Grant	Sensitive Contractual and Competitive Business Information
47-1/1-1/1-3	Gas Transmission	1-2	Cols. A-Q	Grant	Sensitive Contractual and Competitive Business Information
47-1/1-1/1-4	Purchased Statement	1-2	3; Cols. A-D	Grant	Sensitive Contractual Information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 03914-08 and 04588-08					
48-1/1	QF	1	Col. 1	Grant	Sensitive Contractual Information
48-1/1	QF	2	Col. A	Grant	Sensitive Contractual Information
48-1/2	QF	1-2	1	Grant	Sensitive Contractual Information
48-1/3	QF	1-2	1	Grant	Sensitive Contractual Information
48-1/4	QF	1	4,18	Grant	Sensitive Contractual Information
48-1/4-1	QF	1	1,17	Grant	Sensitive Contractual Information
48-1/4-2	QF	1-4	All	Grant	Sensitive Contractual Information
Documents Numbered 03915-08 and 04588-08					
49-2/1	L-T Purchases	1-12	Cols. A-D	Grant	Sensitive Contractual and Competitive Business Information
49-2/2	L-T Purchases	1-15	Cols. A-D	Grant	Sensitive Contractual and Competitive Business Information
49-2/2-1	L-T Purchases	1-5	Cols. A-G	Grant	Sensitive Contractual and Competitive Business Information
49-2/2-2	L-T Purchases	1	5-14,21-23,26-27	Grant	Sensitive Contractual and Competitive Business Information
49-2/3	L-T Purchases	1	Cols. A-B	Grant	Sensitive Contractual and Competitive Business Information
49-2/4	L-T Purchases	1-2	Cols. A-D	Grant	Sensitive Contractual and Competitive Business Information
49-2/4-1	L-T Purchases	1	Cols. A-H	Grant	Sensitive Contractual and Competitive Business Information
49-2/4-2	L-T Purchases	1	Cols. A-F	Grant	Sensitive Contractual and Competitive Business Information
49-2/4-3	L-T Purchases	1	Cols. A-B	Grant	Sensitive Contractual and Competitive Business Information
50-1/1-1	Coal Inventory	1	Cols. A-C	Grant	Sensitive Competitive Business Information
50-1/2	Coal Inventory	1	Cols. A-B	Grant	Sensitive Competitive Business Information
50-1/2-1	Coal Inventory	1	Cols. A-E	Grant	Sensitive Competitive Business Information
50-1/3-1	Coal Inventory	1	Cols. A-L	Grant	Sensitive Contractual and Competitive Business Information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 03915-08 and 04588-08					
50-1/4-1	Coal Inventory	1	Cols. A-L	Grant	Sensitive Contractual and Competitive Business Information
50-1/5-1	Coal Inventory	1	Cols. A-L	Grant	Sensitive Contractual and Competitive Business Information
50-1/6-1	Coal Inventory	1	Cols. A-L	Grant	Sensitive Contractual and Competitive Business Information
51	Coal Adjustment	1	5-8,11	Grant	Sensitive Contractual Information
51	Coal Adjustment	2	1,8,11,19,30	Grant	Sensitive Contractual Information
51-1/1	Coal Adjustment	1-6	All	Grant	Sensitive Contractual Information
53-3	DOE Quarterly Payment	1-4	All	Grant	Sensitive Contractual Information
55-2/1	Transmission Service	1	Cols. G,I	Grant	Sensitive Contractual Information
55-3/1	Transmission Service	1	Cols. H,J-K	Grant	Sensitive Contractual Information
55-4/1	Transmission Service	1	Cols F, H-I	Grant	Sensitive Contractual Information
55-5/1	Transmission Service	1	Cols. H,J	Grant	Sensitive Contractual Information
57-1/1	Vendor Rebates	1	1-3,5-18,20,22	Grant	Sensitive Competitive Business Information
57-1/2	Vendor Rebates	1	1-3,5-18,20	Grant	Sensitive Competitive Business Information
58	Bay Gas	1	8-22	Grant	Sensitive Contractual Information
58-1	Bay Gas	1-3	Col. A	Grant	Sensitive Contractual Information
58-2	Bay Gas	1	Cols. A-C	Grant	Sensitive Contractual and Competitive Business Information
58-2	Bay Gas	2	Cols. A-B	Grant	Sensitive Contractual and Competitive Business Information
58-3/1	Bay Gas	1	Cols. A-K	Grant	Sensitive Contractual Information
58-3/2	Bay Gas	1	1-11,13-18	Grant	Sensitive Contractual Information
58-3/2	Bay Gas	2	1-15	Grant	Sensitive Contractual Information
58-3/3	Bay Gas	1-2	Cols. A-H	Grant	Sensitive Contractual Information
58-3/3	Bay Gas	3	Cols. A-J	Grant	Sensitive Contractual Information

August 12, 2008
Florida Power and Light Request

A temporary copy of this recommendation will be held at I:04588-08 fpl 2007 fuels raf.doc for a short period.

CC: Division of Regulatory Compliance and Consumer Assistance (Welch)
Office of the Commission Clerk (McLean, Cole)