FILED NOV 06, 2015 DOCUMENT NO. 07106-15 FPSC - COMMISSION CLERK



November 6, 2015



Ms. Carlotta Stauffer Commission Clerk Florida Public Service Commission Betty Easley Conference Center 2540 Shumard Oak Boulevard, Room 110 Tallahassee, FL 32399-0850

Re: Docket No. 150009-EI; Nuclear Cost Recovery Clause

Dear Ms. Stauffer:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is a First Request for Extension of Confidential Classification of Staff's work papers for Audit 13-010-4-1, including Revised Exhibit C and Revised Exhibit D.

Please contact me if there are any questions regarding this filing.

Sincerely,

s/ Jessica A. Cano

Jessica A. Cano Fla. Bar No. 0037372

Enclosures cc: Counsel for Parties of Record



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery Clause

)

Docket No. 150009-EI Filed: November 6, 2015

FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF AUDIT PA-13-010-4-1 WORK PAPERS

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests continued confidential classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. PA-13-010-4-1 ("the Audit") and reflected in Staff's work papers. In support of its request, FPL states as follows:

1. On June 28, 2013, in Docket No. 130009-EI, FPL filed a Request for Confidential Classification of the Audit work papers (Confidential Document No. 03678-13). FPL's request was granted by Order No. PSC-14-0210-CFO-EI, issued May 8, 2014. The period of confidential treatment granted by Order No. PSC-14-0210-CFO-EI will soon expire. FPL has reviewed the confidential documents and determined that all the information that was the subject of Order No. PSC-14-0210-CFO-EI warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3), Florida Statutes. Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification. Exhibits A and B from FPL's June 28, 2013 filing are incorporated herein by reference. Included herewith are Revised Exhibit C and Revised Exhibit D.

2. Revised Exhibit C is a table containing the specific line, column and page references to the confidential information, and references to the specific statutory basis or bases for the claim of confidentiality and to the affidavit in support of the continued confidential

classification. Revised Exhibit D includes the affidavits of Stephanie Castaneda and Antonio Maceo in support of FPL's request.

3. The information that was granted confidential treatment by Order No. PSC-14-0210-CFO-EI continues to be confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private in that the disclosure of the information would cause harm to customers or FPL's business operations, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and it is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. As the affidavits included in Revised Exhibit D indicate, the information included in Exhibit A continues to be proprietary, confidential business information. Certain information contained in the Audit work papers is information related to reports of internal auditors. This information is protected by Section 366.093(3)(b), Florida Statutes. The work papers also contain information related to bids or contractual data, such as pricing or other terms, the public disclosure of which would violate nondisclosure provisions of FPL's contracts with certain vendors and impair FPL's ability to contract for goods or services on favorable terms in the future. Such information is protected from public disclosure by Section 366.093(3)(d), Florida Statutes. The work papers also include competitively sensitive information which, if disclosed, could impair the competitive interests of the provider of the information. Such information is protected from public disclosure by Section 366.093(3)(e), Florida Statutes. Additionally, a few documents include competitively sensitive information related to certain employees' compensation. Public disclosure of compensation information would enable competing employers to meet or beat the compensation currently offered, resulting in the loss of talented employees, or conversely, the need to increase the level of compensation already paid in order to retain these employees and attract new talent. The quality of service and the cost of service implications would be detrimental to FPL and its customers. Such information is also protected by Section 366.093(3)(e), Florida Statutes. Lastly, included on these documents are employee cellular phone numbers. This employee information is unrelated to compensation, duties, qualifications, or responsibilities and is therefore protected from public disclosure pursuant to Section 366.093(3)(f), Florida Statutes.

5. Nothing has changed since the issuance of Order No. PSC-14-0210-CFO-EI to render the confidential information stale or public, such that continued confidential treatment would not be appropriate.

6. Upon a finding by the Commission that the information referenced in Revised Exhibit C continues to be proprietary confidential business information, the information should not be declassified for a period of at least an additional eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat. WHEREFORE, for the above and foregoing reasons, as supported by the materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

Jessica A. Cano Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408 Telephone: (561) 304-5226 Facsimile: (561) 691-7135

By: <u>s/ Jessica A. Cano</u> Jessica A. Cano Fla. Bar No. 0037372

CERTIFICATE OF SERVICE DOCKET NO. 150009-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing First Request for Extension of Confidential Classification of Audit PA-13-010-4-1 Work Papers* was served by electronic mail this 6th day of November, 2015 to the following:

Martha F. Barrera, Esq. Kyesha Mapp, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850 mbarrera@psc.state.fl.us kmapp@psc.state.fl.us

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Dianne M. Triplett, Esq. 299 First Avenue North St. Petersburg, Florida 33701 dianne.triplett@duke-energy.com *Attorney for Duke Energy Florida, Inc.*

James W. Brew, Esq. Owen J. Kopon, Esq. Laura A. Wynn, Esq. Brickfield, Burchette, Ritts & Stone, P.C. 1025 Thomas Jefferson Street, N.W. 8th Floor, West Tower Washington, D.C. 20007 jbrew@bbrslaw.com owen.kopon@bbrslaw.com laura.wynn@bbrslaw.com Attorneys for White Springs Agricultural Chemicals, Inc., d/b/a PCS Phosphate-White Springs Robert Scheffel Wright, Esq.
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Jon C. Moyle, Jr., Esq. Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, Florida 32301 jmoyle@moylelaw.com *Attorney for Fla. Industrial Power Users Group*

By:

s/Jessica A. Cano Jessica A. Cano Fla. Bar No. 0037372

*Exhibits are not included with the service copies, but Revised Exhibits C and D are available upon request.

Revised Exhibit C Florida Power and Light Company Staff Audit Work Papers for Audit Control No. 13-010-4-1 Docket No. 130009-EI

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
Index	Confidential Index	4	N			
5-4	Generation- Description of WBS and IO	39	N			
5-5	Description of Cost Elements	46	N			
5-6	Transmission Descriptions	1,	N			
9-1	Internal Audit – Jan- Jun 2012	2	Y	All	(b)	Antonio Maceo
9-1/1	Internal Audit – Jan- Jun 2012 Notes	4	Y	All	(b)	Antonio Maceo
9-2	Internal Audit – Jul – Sep 2012	1	Y	All	(b)	Antonio Maceo
9-2/1	Internal Audit – Jul – Sep 2012 Notes	10	Y	All	(b)	Antonio Maceo
9-3	Internal Audit – Oct – Dec 2012	1	Y	All	(b)	Antonio Maceo
12	2011 and 2012 B/S Comparison	4	N			
12-1	CWIP Additions by Business Area	1	N			
12-2	Rec to EPU Excerpt	1	N			
12-2/1	2012 EPU Work Order Listed w/ Total Bal. at 2012	1	N			
12-2/2	2012 EPU Work Order Listed w/ Total Bal. at 2011	1	N			
12-2/3	AFUDC	2	N			
12-3/1	O&M Excerpt	1	N			
12-3/2	Trans Per Ledger	2	N			
12-4	O&M Additions	1	N			
12-5	2012 O&M Rec to Filing	1	N			
15-2/1	January Base Rate Rev Req	1	N			
15-2/2	March Base Rate Rev Req	2	N			
15-2/3	April Base Rate Rev Req	2	Ν			

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
15-2/4	June Base Rate Rev Req	1	N			
15-2/5	July Base Rate Rev Req	3	N			
15-2/6	August Base Rate Rev Req	3	N			
15-2/7	September Base Rate Rev Req	5	N			
15-2/8	November Base Rate Rev Req	7	Ν			
15-2/9	December Base Rate Rev Req	1	Ν			
15-3	Post In Service Base Rate Rev Req	1	N			
15-3/1	Feb Post In Service	1	N			
15-3/2	Apr Post In Service	2	N			
15-3/3	May Post In Service	2	N		an a	
15-3/4	July Post In Service	1	N			
15-3/5	Aug Post In Service	3	N			
15-3/6	Sept Post In Service	3	N		9	
15-3/7	Oct post In Service	5	N			
15-3/8	Dec Post In Service	7	N			
15-3/9	Cash Flows	1	N	1		
15-4	Contractor Change Adj	1	N			
15-4/1	Adjustments	6	N			
15-4/1-1	Sales and Use Tax Adj	5	Y	Page 1 Lines 1- 5	(d) (e)	Stephanie Castaneda
				Page 2 Line 1		
				Page 3 Lines 1- 5		
				Page 4-5 No		
15-4/2	Contractor Adj Recal	2	Ν			
15-5	Sales Tax Entry Adj	1	N			
15-5/1	Sales Tax Adj Recal	2	N			
15-6	Revenue Req Recal	16	N			
15-7	Post In Service Rev Req	17	N			
15-7/1	WO Post In Service Bal	2	N			
15-7/2	Amortization	1	N			
15-7/2-1	Follow-up Questions	1	N			

Document	Description	No. of	Conf.	Line	Florida	Affiant
		Pages	Y/N	No./Col. No.	Statute 366.093 (3) Subsection	
19-3	Gen CWIP Test	15	Y	Page 1 Lines 1- 9	(d) (e)	Stephanie Castaneda
				Page 2 Lines 1- 10		
		27		Page 3 Lines 1- 12	x	
				Page 4 Lines 1- 12		
				Page 5 Lines 1- 14		
				Page 6 Lines 1- 13		
				Page 7 Lines 1- 10		
				Page 8 Lines 1- 9		
				Page 9 Lines 1- 10		
				Page 10 Column A		
				Page 11 Column A		
				Page 12 Lines 1-12		
				Page 13 Lines 1-11		
				Page 14 Lines 1-7		
		15 #		Page 15 Lines 1-10		
19-3/1	Sample #23	5	Y	Page 1 Lines 1- 8	(d) (e)	Stephanie Castaneda
				Page 2 Columns A-G and Line 1		

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				Page 3 Column A Page 4 Column	þ	
				A Page 5 Column A		
19-3/1-1	Sample #23	6	Y	Page 1 Lines 1- 2 and Columns A-C	(d) (e)	Stephanie Castaneda
				Page 2 Columns A-F		
				Page 3 Columns A-F Page 4		
				Columns A-O Page 5		
				Columns A-F Page 6 Lines 1- 4 and Columns A-C		
19-3/2	Sample #24	5	Y	Page 1 Lines 1- 8	(d) (e)	Stephanie Castaneda
				Page 2 Columns A-E and Line 1		
				Page 3 Column A		
	-			Page 4 Column A		
				Page 5 Column A		
19-3/2-1	Sample #24	13	Y	Page 1 Columns A-C	(d) (e)	Stephanie Castaneda
				Page 2 Columns A-C		
				Page 3 Columns A-C		

Document	Description	No. of	Conf.	Line	Florida	Affiant
		Pages	Y/N	No./Col. No.	Statute 366.093 (3) Subsection	
				Page 4 Columns A-F	Cubbeellon	
				Page 5 Columns A-C		
				Page 6 Columns A-F		
			П	Page 7 Columns A-O		
				Page 8 Columns A-F		
				Page 9 Columns A-C		
				Page 10 Columns A-O		
	÷			Page 11 Columns A-F		
				Page 12 Columns A-F		
				Page 13 No		
19-3/2-1/1	Sample #24	2	Y	Page 1 Column A	(d) (e)	Stephanie Castaneda
				Page 2 Column A and Line 1		
19-3/3	Sample #34	6	Y	Page 1 Lines 1- 8	(d) (e)	Stephanie Castaneda
				Page 2 Lines 1- 4		
				Page 3 Columns A-G and Line 1		
				Page 4 Column A		
				Page 5 Column A		
				Page 6 Column A		

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
19-3/3-1	Sample #34	10	Y	Page 1 Columns A-C	(d) (e)	Stephanie Castaneda
	π			Page 2 Columns A-F		
				Page 3 Columns A-F		
				Page 4 Lines 1- 4 and Columns A-C		
				Page 5 Columns A-F		
				Page 6 Lines 1- 3 and Columns A-F		
				Pages 7 Columns A-C		
				Page 8 Columns A-O		
				Page 9 Columns A-L		
				Page 10 Columns A-F and Lines 1-2		
19-3/4	Sample #62	5	Y	Page 1 Lines 1- 7	(d) (e)	Stephanie Castaned
	л.			Page 2 Columns A-G and Line 1		
				Page 3 Column A		
				Page 4 Column A		
				Page 5 Columns A-C		
19-3/4-1	Sample #62	18	Y	Page 1-18 Columns A-C	(d) (e)	Stephanie Castaneda
19-3/5	Sample #24 – 3 rd Qtr	3	Y	Page 1 Lines 1- 3	(d) (e)	Stephanie Castaneda

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
		k.		Page 2 Columns A-H and Line 1		
				Page 3 Column A		
19-3/6	Sample #10 – 4 th Qtr	3	Y	Page 1 Column A	(d) (e)	Stephanie Castaned
				Page 2 Lines 1- 2		
				Page 3 Lines 1- 22		
19-3/7	Sample #5 4 th Qtr	1	Y	Page 1 Lines 1- 18	(d) (e)	Stephanie Castaned
19-3/8	Follow-up Questions	1	Ν			
19-4	Transmission Test	9	Y	Page 1 Column A	(d) (e)	Stephanie Castaned
				Page 2 Lines 1- 12		
				Page 3 Column A		
				Page 4 Lines 1- 17		
				Page 5 Lines 1- 16	ti.	
				Page 6 Column A		
				Page 7 Lines 1- 10		
				Pages 8-9 Column A		
19-6/1	Appendix E Adj	2	N			
20-3	2011 Tax Return	4	Y	Page 1 Line 1 Page 2 Lines 1-	(e)	Stephanie Castaneda
				4		
				Pages 3-4 Columns A-E		

20-4	Tax Deduction	1	Y	Page 1 Lines 1-	(e)	Stephanie
20.1/1	Summary			14		Castaneda
20-4/1	Tax Deduction Footnote H & K	1	Y	Page 1 Lines 1- 13	(e)	Stephanie Castaneda
20-4/2	Tax Deduction May	1	Y	Page 1 Lines 1-	(e)	Stephanie
	2011			9	101 (21	Castaneda
21-1	Schedule T-7A	8	Y	Pages 1-8	(d) (e)	Stephanie
21-1/1	T-7B Contract	1	Y	Columns A-D Page 1 Line 1	(d) (e)	Castaneda Stephanie
21 1/1	#200059776			I age I Ente I	(u) (c)	Castaneda
21-1/1-1	Contract #	1	Y	Page 1 Column	(d) (e)	Stephanie
	200059776 Per			A		Castaneda
21-1/1-2	Books PO# 200059776	5	Y	Page 1 No		Sterler's
21-1/1-2	PO# 200039770	3	Y	Page I No	(d) (e) (f)	Stephanie Castaneda
	3			Page 2 Lines 1-		Custaneda
				14		
				Daga 2 Lines 1		
				Page 3 Lines 1- 17		
				Page 4 Lines 1-		
				2		
				Page 5 Lines 1-		
				3		
21-1/2	PO# 118206 Sch T-7B	1	Y	Page 1 Line 1	(d) (e)	Stephanie Castaneda
21-1/2-1	PO# 118206	13	Y	Page 1 Lines 1-	(d) (e) (f)	Stephanie
				16		Castaneda
				D OT I		
				Page 2 Lines 1- 9		
				Page 3 Lines 1-		
				5		
				Page 4 Line 1		
				Page 5 No		
				Page 6 Line 1		
				Page 7 No		
				Page 8 Lines 1-		
				5		
				Page 9 No		
				Page 10-13 All		
21-1/2-2	PO# 118206 Per	2	Y	Pages 1-2	(d) (e)	Stephanie
21-1/3	Books T-7B PO # 2312358	1	Y	Column A	(d)	Castaneda
21-1/3	1-7010#2012030	1	I	Page 1 Line 1	(d) (e)	Stephanie Castaneda

21-1/3-1	PO #2312358	3	Y	Page 1 Lines 1- 5	(d) (e) (f)	Stephanie Castaneda
				Page 2 Lines 1- 14		
				Page 3 Lines 1- 2		
21-1/3-2	Siemens Agreement	10	Y	Page 1 Lines 1- 4	(d) (e)	Bruce Beisler
				Page 2 Lines 1- 15		
				Pages 3-6 Lines 1-23		
				Page 7 Lines 1- 22		
				Page 8 Lines 1- 15		
				Page 9-10 No		
21-1/3-3	PO #2312358 Per Books	1	Y	Page 1 Column A	(d) (e)	Stephanie Castaneda
21-2	2012 Contracts	4	Y	Page 1 Column A	(d) (e)	Stephanie Castaneda
				Page 2 Column A and Line 1		
				Page 3 Lines 1- 14		
				Page 4 Lines 1- 15		
21-3	EPU Summary Presentation	82	Y	Page 1-44 No		Stephanie Castaneda
	Tresonation			Page 45 Lines 1-7	(d) (e)	Castaneda
				Page 46 Lines 1-3		
				Page 47-82 No		
23-2/1-2/1	Removal Cost Test	1	N			
23-2/1-3/1	Salvage Test	1	Y	Page 1 Lines 1- 9	(d) (e)	Stephanie Castaneda
25-1	EPU Req 4 Response	2	N			
25-1/1	Pivot Table Affiliate	2	Y	Pages 1-2 Columns A-G	(e)	Stephanie Castaneda
25-1/2	Loader Rates	3	Y	Page 1 Lines 1- 11	(e)	Stephanie Castaneda

1			Ĩ	Page 2		
				Columns A-H		
				Page 3 Columns A-G and Lines 1-2		
25-1/2-1	Loader Rates	8	Y	Page 1 Lines 1- 16	(e)	Stephanie Castaneda
				Page 2 All		
				Page 3 Columns A-D		
÷				Page 4 Lines 1- 5		
				Page 5 Lines 1- 6		
				Page 6 All		
				Page 7 No		
				Page 8 All		
25-1/2-2	Retention Bonus	8	Y	Page 1 Lines 1- 6	(e)(f)	Stephanie Castaneda
				Page 2 Lines 1- 3		
				Pages 3-8 Line 1		
25-1/3	Lower of Cost or Market	3	Y	Page 1 Lines 1- 6	(d) (e)	Stephanie Castaneda
				Pages 2-3 Column A		
25-1/4	Affiliate Transactions	1	N			
25-2	DRR 4 Response	2	N			
25-2/1	Affiliate Transactions	11	N			
25-2/1-1	Pivot Table Affiliate Trans	2	Y	Pages 1-2 Columns A-D	(d) (e)	Stephanie Castaneda
25-2/1-1/1	Affiliate Transactions	1	Y	Page 1 Lines 1- 21	(d) (e)	Stephanie Castaneda
25-2/1-1/1-1	Payroll and Benefits	2	Y	Pages 1-2 Columns A-D	(d) (e)	Stephanie Castaneda
25-2/1-1/1-2	Loader Rates	2	Y	Page 1 Lines 1- 16	. (e)	Stephanie Castaneda
				Page 2 Columns A-D		

25-2/1-1/1-2/1	Loader Rates	2	Y	Page 1 Lines 1- 5	(e)	Stephanie Castaneda
				Page 2 Lines 1- 6		
25-2/1-1/1-2/2	Loader Rates	1	Y	All	(e)	Stephanie Castaneda
25-2/2	Lower of Cost or Market	2	Y	Page 1 Lines 1- 8	(d) (e)	Stephanie Castaneda
				Page 2 Column A		
25-2/2-1	Lower of Cost/Market	3	Y	Pages 1-3 Column A	(d) (e)	Stephanie Castaneda
25-2/2-1/1	Affiliate Transactions	18	Y	Pages 1-18 Column A	(d) (e)	Stephanie Castaneda
43-2/1	Appendix F Adj	1	N			
43-3	O&M Participants Credit Recal	1	N			
43-4	O&M Test	12	Y	Page 1 Lines 1- 17	(d) (e)	Stephanie Castaneda
				Page 2 Lines 1- 13		
				Page 3 Lines 1- 7		
				Page 4 Lines 1- 8		
				Page 5 Lines 1- 11		
				Page 6 Lines 1- 10		
				Page 7 Lines 1- 7		
				Page 8 Lines 1- 5		
				Page 9 Lines 1- 5		
				Page 10 Lines 1-4		
				Page 11 Lines 1-4		
		10		Page 12 Lines 1-11		
43-4/1	Capitalization Policy	11	N			

43-4/2	Write off #1	4	N			
43-4/3	Warranty Reclass Effect	1	N			
43-4/3-1	Radio Reclass Entry	3	Y	Page 1 No	(d) (e)	Stephanie Castaneda
				Pages 2-3 Columns A-B		
44-1	O&M Total Payroll GL Pivot	1	N			
44-2	Generation Straight Time Payroll	9	Y	Pages 1-9 Columns A-B	(e)	Stephanie Castaneda
44-2/1	Total Payroll – GL GL Pivot	1	N			
44-2/1-1	GL Straight Time & Rec	2	N			
44-2/1-1/1	Co Payroll Identifiers	1	N			
44-2/1-2	Dec 2012 Reversals	1	Y	Page 1 Column A	(e)	Stephanie Castaneda
44-2/2	Employees Selected for Testing	1	N			
44-2/2-1	2010 Payroll Support	4	N			
44-2/2-2	Timesheet Report	11	N			
44-2/2-3	Hourly Rates	2	Y	Page 1 Columns A-C	(e)	Stephanie Castaneda
				Page 2 Columns A-C		
44/2/2-4	Job Descriptions	3	N			
44-2/3	Reclassed Hrs 2012	1	N			
44-3	Straight Time Only – Trans Payroll Analysis	2	Y	Pages 1-2 Columns A-C	(e)	Stephanie Castaneda
44-3/1	Trans Total Payroll – GL Pivot	1	N			
44-3/1-1	Trans Straight Time & Rec	1	N			
44-3/1-1/1	Payroll Identifiers	1	N			
44-3/2	Adjustment	1	N			
44-3/3	Trans Payroll Test and Questions	1	Y	Page 1 Lines 1- 15	(e)	Stephanie Castaneda
44-3/3-1	Test of Trans Payroll Hrly Rate	1	Y	Page 1 Lines 1- 5 and Column A	(e)	Stephanie Castaneda
44-3/3-2	Work Order Descriptions	3	N			
44-3/3-3	2010 Eligible Hrs.	3	N			
44-3/3-4	Job Descriptions	1	N			
44-4A	Overhead and Incentives	2	N			
44-4	Payroll Overhead Test	2	N			

44-4/1-1	Overhead Follow-up	2	Y	Page 1 No		Stephanie Castaneda
				Page 2 All	(e)	
44-5	Overtime	2	N			
45-1	Separate and Apart Guidelines	1	N			
45-2	Justification Forms	6	Y	Page 1 Lines 1- 3	(d) (e) (f)	Stephanie Castaneda
				Page 2 Lines 1- 2		
				Page 3 Lines 1- 2		
				Page 4 No		
				Page 5-6 Lines 1-2		

REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery Clause)	DOCKET NO. 150009-EI		
STATE OF FLORIDA)				
) ALM BEACH COUNTY)		AFFIDAVIT OF STEPHANIE CASTANED		

BEFORE ME, the undersigned authority, personally appeared Stephanie Castaneda who, being first duly sworn, deposes and says:

1. My name is Stephanie Castaneda. I am currently employed by Florida Power & Light Company ("FPL") as Nuclear Business Operations, Fleet Accounting and Regulatory Compliance. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the documents that are the subject of FPL's First Request for Extension of Confidential Classification of Audit 13-010-4-1 Work Papers, for which I am identified on Revised Exhibit C as the affiant. The documents and materials that I have reviewed contain proprietary confidential business information, including contractual data and competitively sensitive data. Disclosure of this information would violate FPL's contracts with its vendors, work to the detriment of FPL's competitive interests, impair the competitive interests of its vendors and/or impair FPL's efforts to enter into contracts on commercially favorable terms. Additionally, certain of these materials contain competitively sensitive information related to certain employees' compensation. Public disclosure of compensation information for particular positions would enable competing employers to meet or beat the compensation offered by FPL, resulting in the loss of talented employees, or conversely, the need to increase the level of compensation already paid in order to retain these employees and attract new talent. The quality of service and the cost of service implications would be detrimental to FPL and its customers. Finally, these documents include employee cell phone numbers which FPL has an obligation to maintain as confidential. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. No significant changes have occurred since the issuance of Order No. PSC-14-0210-CFO-EI to render the information identified in Revised Exhibit C stale or public such that continued confidential treatment would not be appropriate. Accordingly, this information should continue to be maintained as confidential for an additional period of not less than eighteen months. These materials should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.

Sworn TO AND SUBSCRIBED before me this 5^{+h} day of November 2015, by Stephanie Castaneda, who is personally known to me or who has produced __________ (type of identification) as identification and who did take an oath.

Notary Public, State of Florida

My Commission Expires:



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery Clause

DOCKET NO. 150009-EI

STATE OF FLORIDA

MIAMI-DADE COUNTY

AFFIDAVIT OF ANTONIO MACEO

BEFORE ME, the undersigned authority, personally appeared Antonio Maceo who, being first duly sworn, deposes and says:

1. My name is Antonio Maceo. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Auditing. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the documents that are the subject of FPL's First Request for Extension of Confidential Classification of Audit 13-010-4-1 Work Papers, for which I am identified on Revised Exhibit C as the affiant. The documents that I have reviewed contain information related to reports of internal auditors. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing scope, process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may affect the effectiveness of the Internal Auditing department itself. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. No significant changes have occurred since the issuance of Order No. PSC-14-0210-CFO-EI to render the information identified in Revised Exhibit C stale or public such that continued confidential treatment would not be appropriate. Accordingly, this information should continue to be maintained as confidential for an additional period of not less than eighteen months. These materials should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.

Antonio Maceo

SWORN TO AND SUBSCRIBED before me this 512 day of November 2015, by Antonio Maceo who is personally known to me or who has produced (type of identification) as identification and who did take an oath.

CAROLYN J SMITH

Commission # FF 122975

My Commission Ex



lotary Public, State of Florida