



Jessica A. Cano
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January 8, 2016

VIA ELECTRONIC FILING

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. 160009-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 Audit Control No. 14-007-4-2 Work Papers, including Revised Exhibit C and Revised Exhibit D.

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

Sincerely,

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. 160009-EI
Filed: January 8, 2016

**FLORIDA POWER & LIGHT COMPANY'S
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION
OF AUDIT CONTROL NO. 14-007-4-2 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 Audit Control No. 14-007-4-2 Work Papers (the "Audit Work Papers"). In support of its request, FPL states as follows:

1. On June 12, 2014, in Docket No. 140009-EI, FPL filed a Request for Confidential Classification of the Audit Work Papers (Confidential Document No. 02951-14 (cross reference no. 02544-14)). FPL's request was granted by Order No. PSC-14-0347-CFO-EI, issued July 9, 2014. The period of confidential treatment granted by Order No. PSC-14-0347-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-14-0347-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 12, 2014 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 Brenda Thompson and Antonio Maceo in support of FPL's request.

3. The information that was granted confidential treatment by Order No. PSC-14-0347-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 FPL's internal auditors. This information is protected from public disclosure by Section 366.093(3)(b), Florida Statutes. The Audit 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 Audit Work Papers also contain 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. 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.

5. Nothing has changed since the issuance of Order No. PSC-14-0347-CFO-EI to render the confidential information stale or public, such that continued confidential treatment would not be appropriate. Moreover, this information will remain confidential for a period longer than the 18 months typically provided for confidential treatment, and it is anticipated that Staff will retain these documents for more than 18 months. Accordingly, FPL requests that confidential treatment be extended for a period of not less than five years. The Commission has previously granted similar requests for extended periods of confidential treatment. *See, e.g.*, Docket No. 140009-EI, Order No. PSC-14-0649-CFO-EI, p. 2 (issued Nov. 4, 2014).

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 five years 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: s/ Jessica A. Cano
Jessica A. Cano
Fla. Bar No. 0037372

**CERTIFICATE OF SERVICE
DOCKET NO. 160009-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing First Request for Extension of Confidential Classification of Audit Control No. 14-007-4-2 Work Papers* was served by electronic mail this 8th day of January, 2016 to the following:

Martha F. Barrera, Esq.
Kyesha Mapp, Esq.
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Florida Public Service Commission
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Tallahassee, Florida 32399-0850
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kmapp@psc.state.fl.us

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Attorney for Fla. Industrial Power Users Group

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Attorney for the Citizens of the State of Fla.

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St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com
Attorney for Duke Energy Florida, Inc.

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
Company: Florida Power and Light Company
Title: List of Confidential Workpapers Audit Control No. 14-007-4-2
Docket No. 140009-EI

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
Index	Confidentiality Index	1	N			
Cover Page	Cover Page	1	N			
9	List of Internal Audits	2	Y	All	(b)	Antonio Maceo
9-1	Internal Audits	4	Y	All	(b)	Antonio Maceo
9-2	Internal Audits	3	Y	All	(b)	Antonio Maceo
12-1 p. 1 & 3	Reconciliation to the General Ledger	2	N			
12-1/2	List of WBS Elements	2	Y	Page 1 Line 1 Page 2 No	(d)(e)	Brenda Thompson
12-1/3	New Nuclears Transactions	1	Y	Page 1 Line 1	(d)(e)	Brenda Thompson
12-1/4	General Ledger (July thru Sept)	2	Y	Page 1 Lines 1-6 Page 2 No	(d)(e)	Brenda Thompson
12-1/5	New Nuclears Transactions (Oct. thru Dec)	1	N			
19 p. 2	Construction of Work in Progress	1	N			
19-1/1	Construction of Work in Progress	2	Y	Page 1 Lines 1-4 Page 2 Lines 1-3	(d)(e)	Brenda Thompson
19-1/1	Construction of Work in Progress	1	Y	Page 3 Line 1 Page 3 Lines 2-4	(b) (d)(e)	Antonio Maceo Brenda Thompson
19-1/1	Construction of Work in Progress	13	Y	Page 4 Line 1 Page 5 Lines 1-7 Page 6 No Page 7 Lines 1-4 Page 8 Lines 1-2 Page 9-10 No Page 11-12, Lines 1-2 Page 13 Lines 1-4	(d)(e)	Brenda Thompson

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				Page 14 Lines 1-15 Page 15 Lines 1-12 Page 16 No		
19-1/1-1	Construction of Work in Progress	5	N			
19-1/2	Construction of Work in Progress	3	Y	Page 1 Lines 1-11 Page 2-3 Lines 1-9	(d)(e)	Brenda Thompson
19-1/3	Construction of Work in Progress	1	Y	Page 1 Lines 1-8	(d)(e)	Brenda Thompson
44	Organizational Charts	2	N			
45-1 p. 1	Contracts	1	Y	Page 1 Columns A-D	(d)(e)	Brenda Thompson
45-1 p. 3 thru 11	Contracts	9	Y	Pages 3-11 Line 1	(d)(e)	Brenda Thompson
45-1/1	Contracts	10	Y	Page 1 Lines 1-19 Page 2 Lines 1-17 Page 3 Line 1 Page 4 Lines 1-3 Page 5 Lines 1-9 Page 6 Lines 1-15 Page 7 Lines 1-13 Page 8 Lines 1-18 Pages 9-10 Lines 1-15	(d)(e)	Brenda Thompson
46-1	Payroll	4	N			
46-1/1	Payroll	32	Y	Pages 1-32 Column A	(e)	Brenda Thompson
46-1/1-1	Payroll	3	Y	Pages 1-3 Column A	(e)	Brenda Thompson
46-1/1-2	Payroll	1	N			
46-1/2	Payroll	34	Y	Pages 1-32 Column A Pages 33-34 No	(e)	Brenda Thompson
46-1/3	Payroll	1	Y	Page 1 Columns A-H and Lines 1-4	(e)	Brenda Thompson
46-1/3-1	Payroll	2	Y	Page 1 Columns A-B	(e)	Brenda Thompson

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				Page 2 Column A		
46-1/3-2	Payroll	2	Y	Pages 1-2 Column A	(e)	Brenda Thompson
46-1/3-3	Payroll	3	Y	Page 1 Columns A-I Pages 2-3 Columns A-D	(e)	Brenda Thompson
46-2	Payroll	3	Y	Page 1 Columns A-C Page 2 Lines 1-22 Page 3 Columns A-C	(e)	Brenda Thompson
46-2/1	Payroll	1	N			
46-2/1-1	Payroll	2	N			
46-2/1-2	Payroll	8	N			
49-1	Affiliate Charges	1	Y	Page 1 Columns A-C	(d)(e)	Brenda Thompson
49-1/1	Affiliate Charges	2	Y	Pages 1-2 Column A	(d)(e)	Brenda Thompson
49-1/1-1	Affiliate Charges	2	Y	Page 1 Lines 1-17 Page 2 No	(d)(e)	Brenda Thompson
49-1/2	Affiliate Charges	4	Y	Page 1 Lines 1-16 Page 2 Columns A-D Page 3 Lines 1-5 Page 4 Lines 1-6	(d)(e)	Brenda Thompson
49-1/2-1	Affiliate Charges	1	Y	Page 1 Columns A-D and Lines 1-2	(d)(e)	Brenda Thompson
49-2	Affiliate Charges	2	Y	Page 1 No Page 2 Lines 1-4	(d)(e)	Brenda Thompson

REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

DOCKET NO. 160009-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT OF BRENDA THOMPSON

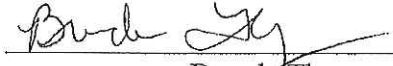
BEFORE ME, the undersigned authority, personally appeared Brenda Thompson who, being first duly sworn, deposes and says:

1. My name is Brenda Thompson. I am currently employed by Florida Power & Light Company as Nuclear Project Controls Manager. 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 14-007-4;2 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. 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-14-0347-CFO-EI to render the information identified in Revised Exhibit C stale or public such that continued confidential treatment would not be appropriate. Additionally, this information will continue to be confidential for more than the next 18 months. Accordingly, this information should continue to be maintained as confidential for an additional period of not less than five years. 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.


Brenda Thompson

SWORN TO AND SUBSCRIBED before me this 7th day of January 2016, by Brenda Thompson, 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. 160009-EI

STATE OF FLORIDA)
)
MIAMI-DADE COUNTY)

AFFIDAVIT OF ANTONIO MACEO

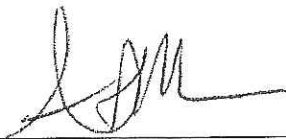
BEFORE ME, the undersigned authority, personally appeared Antonio Maceo who, being first duly sworn, deposes and says:

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 14-007-4-2 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.

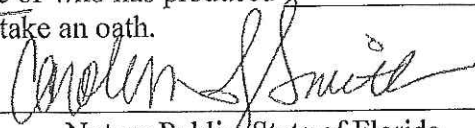
3. No significant changes have occurred since the issuance of Order No. PSC-14-0347-CFO-EI to render the information identified in Revised Exhibit C stale or public such that continued confidential treatment would not be appropriate. Additionally, this information will continue to be confidential for more than the next 18 months. Accordingly, this information should continue to be maintained as confidential for an additional period of not less than five years. 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 7th day of January 2016, by Antonio Maceo 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:

