



Maria J. Moncada
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
561-304-5795
(561) 691-7135 (Facsimile)
E-mail: Maria.Moncada@fpl.com

January 15, 2016

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 120251-EI

REDACTED

COMMISSION
CLERK

2016 JAN 15 PM 2:27

RECEIVED-FPSC

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Second Request for Extension of Confidential Classification of Information of Materials Provided Pursuant to Staff's Payment Arrangement Audit. The filing includes First Revised Exhibits A, B (two copies), C and Second Revised Exhibit D.

First Revised Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. First Revised Exhibit B is an edited version of First Revised Exhibit A, in which the information FPL asserts is confidential has been redacted. First Revised Exhibit C is a justification table in support of FPL's Second Request for Extension of Confidential Classification. Second Revised Exhibit D contains the affidavit in support of FPL's Second Request for Extension of Confidential Classification.

Please contact me if you or your Staff has any questions regarding this filing.

Sincerely,

Maria J. Moncada

- COM _____
- AFD _____
- APA Redacted
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- TEL _____
- CLK _____

Enclosure

cc: Carl Vinson
Kevin Carpenter
Victor Cordiano

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Staff's Review of Payment Arrangement
Programs Offered By the Florida Electric
Industry

Docket No: 120251-EI

Date: January 15, 2016

**FLORIDA POWER & LIGHT COMPANY'S SECOND
REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its Second Request for Extension of Confidential Classification of Information contained in FPSC Staff's Payment Arrangement Audit ("Confidential Information"). In support of this request, FPL states as follows:

1. On October 3, 2012, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("October 3, 2012 Request"). By Order No. PSC-12-0629-CFO-EI, dated November 21, 2012 ("Order 0629"), the Commission granted FPL's October 3, 2012 Request. FPL adopts and incorporates by reference the October 3, 2012 Request and Order 0629.

2. On May 15, 2014, FPL filed its First Request for Extension of Confidential Classification of the Confidential Information, which included First Revised Exhibit D ("May 15, 2014 Request"). By Order No. PSC-14-0370-CFO-EI, dated July 17, 2014 ("Order 0370"), the Commission granted FPL's May 15, 2014 Request. FPL adopts and incorporates by reference the May 15, 2014 Request and Order 0370.

3. The period of confidential treatment granted by Order 0370 will soon expire. The Confidential Information that was the subject of FPL's May 15, 2014 Request and Order 0370 warrants continued treatment as proprietary and confidential business information within the

meaning of Section 366.093(3). Accordingly, FPL hereby submits its Second Request for Extension of Confidential Classification.

4. Included herewith and made a part hereof are First Revised Exhibit A, First Revised Exhibit B, together with First Revised Exhibit C to reduce the number of pages for which confidential treatment is sought.

5. First Revised Exhibits A and B consist of highlighted and redacted copies of the specific work papers where FPL has determined that a portion of the information previously designated as confidential requires continued confidential treatment.

6. First Revised Exhibit C is a table that identifies the specific pages, lines or columns that remain confidential. The table also references the specific statutory basis for confidentiality and the affiants who support the requested classification.

7. Also included with this request is Second Revised Exhibit D. Second Revised Exhibit D consists of the affidavit of Ana Babcock.

8. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, such materials are entitled to confidential treatment and are 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.

9. As more fully explained in the affidavit included in Second Revised Exhibit D, certain information provided by FPL contains information relating to competitive interests, the

disclosure of which would impair the competitive business of FPL. This information is protected by Section 366.093(3)(e), Fla. Stat.

10. Nothing has changed since the Commission entered Order 0370 to render the Confidential Information designated in First Revised Exhibits A, B and C stale or public, such that continued confidential treatment would not be appropriate.

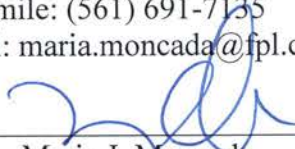
11. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its Second Request for Extension of Confidential Classification be granted.

Respectfully submitted,

John T. Butler
Assistant General Counsel – Regulatory
Maria J. Moncada
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135
Email: maria.moncada@fpl.com

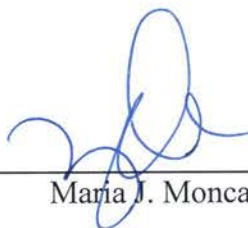
By: _____


Maria J. Moncada
Fla. Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 120251-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Second Request for Extension of Confidential Classification* has been furnished by electronic service on this 15th day of January 2016 to the following:

Carl Vinson
Kevin Carpenter
Victor Cordiano
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850



Maria J. Moncada

* The exhibits to this Request are not included with the service copies, but a copy of First Revised Exhibits B, C and Second Revised Exhibit D are available upon request.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

REDACTED

1 extend a customer due date for up to ^A days. Exhibit 8 contains the number of payment arrangements requested for the years 2007 to 2011. The number of payment arrangements established has steadily increased to a high of 1,422,375 in 2011. The number of payment arrangements denied peaked in 2009 at 1,006,236, and has since declined. FPL has relaxed its criteria for granting payment extension requests, including payment extensions related to deposits, providing a better opportunity for customers to continue service with the utility.

FLORIDA POWER & LIGHT COMPANY PAYMENT ARRANGEMENTS REQUESTED 2007 - 2011					
	2007	2008	2009	2010	2011
Established ⁹	897,809	1,035,277	1,260,573	1,271,002	1,422,375
Denied	844,658	881,473	1,006,236	907,905	876,604
Total Requested	1,742,467	1,916,750	2,266,809	2,178,907	2,298,979

EXHIBIT 8

Source: FPL Response Document Request 1.20, 1.21 and 3.1

The number of payment arrangements completed or defaulted for the years 2007 to 2011 is shown in Exhibit 9. The highest number of payment arrangements completed was in 2011 at 941,845. The number of payment arrangements that defaulted was highest in 2007 at 347,452; however, an increase in defaults occurred in 2011, as well.

FLORIDA POWER & LIGHT COMPANY PAYMENT ARRANGEMENT DISPOSITION 2007 - 2011					
	2007	2008	2009	2010	2011
Completed	550,357	746,111	837,927	854,578	941,845
Defaulted	347,452	269,866	295,007	278,326	325,802
Total Disposition	897,809	1,015,977	1,132,934	1,132,904	1,267,647

EXHIBIT 9

Source: FPL Response Document Request 1.20 and 1.21

2.2.2 BENCHMARKING STUDIES

Staff found that FPL participated in a 2011 PA Consulting Group benchmarking study that provided an assessment of utility business operations, including an analysis of credit and collections strategy and development for a group of utilities. FPL states that this study showed that FPL granted more payment extensions per customer than nearly all other utilities in the study. The study also showed that FPL ranked among the lowest in broken or modified arrangements.

Additionally, FPL participated in an annual utility benchmarking program conducted by Edison Electric Institute (EEI) DataSource. Data collected from this program includes payment arrangement inquiry data for 2008-2010 related to:

⁹ Jan 2007 - Oct 2008 payment extensions granted or established contains only COR (Customer Care), IVR (Interactive Voice Response) and Web contacts. Nov 2008 - Dec 2011 payment extensions granted or established contains contacts made through the following channels: COR (Customer Care), IVR / VRU (Interactive Voice Response), Web, Revenue Recovery, Revenue Protection, Customer Advocacy, PSC, SCS, Assist, Customer Billing, Field Operations and Other.

¹⁰ 2007 Payment Arrangement Disposition based on the 2007 number of payment arrangements granted using the Customer Compliance % Care Center Overall from December 2007 Payment Extension Monthly Summary Report to calculate the completed/defaulted amounts.

options/arrangements?

In addition to two FPL care centers, GCS Services act as virtual customer service under a 6-year contract.

Final Bill for residential has automated OTC.

Revenue Protection handles backbilling, meter tampering or by-pass.

SCS - Special Consumer Services. Four personnel that work with assist agencies.

DRI.11

17. What can you tell us about the other utilities in the PA Consulting Group study? Were any of these utilities in Florida or the Southeast?

None in Florida. Across all CSR.

18. Can you tell us whether any of the utilities in the Superduper Confidential EEL DataSource study include other Florida or other Southeast utilities?

Yes, in Florida.

DRI.12

(no questions regarding the data)

DRI.13

19. Were there any audits performed by outside companies, regarding collection of past due amounts from customers and/or payment arrangements?

No.

DRI.14

(no questions regarding the data)

DRI.15

20. Can you describe:

- the PEXT Guidelines and Graphs on October 2011 Revenue Recovery document?
- The Field Collections Summary
- OTC Indicator Summary

Leave notice; CGI -- cannot get in.

NCO - outsourced contractor does dialing; outbound calls for collection.

MES - Medical Essential Services.

Amnesty

Field Collections Summary (DRI.21):

OTC Indicator Summary (DRI.21): The summaries measure the effectiveness of outbound collections calls.

Supplemental DRI.15: Please provide the November and December 2011 data.

DRI.16: (KC) Can you describe the Denial Codes in the spreadsheets?

Carlos said employee enters code in CIS II database. Some customers are granted PAs but then do not comply. A

1 Denial codes are listed in the response:

2

—this is another risk factor that would render a customer ineligible for a payment arrangement. A

(KC) It appears that each attempt by a customer that is denied is counted (i.e., multiple denials). Is that correct?

(KC) The (blank) denial reason is "Customer hung up or declined recommendation." This means that the customer declined the recommendation by the FPL employee, correct?

DRI.17 (KC) On the "PEXT granted" spreadsheets, account numbers indicate that accounts have been granted additional (more than one) payment arrangement. Is that correct?

DRI.18 and DRI.19 (KC) Are the Gross Write-offs data in accounts or dollars?

(either JH or Carlos) Net Amnesty — this is for the medical essential services

(either JH or Carlos) Write-offs — manage receivables to manage write-offs.

DRI.20 (KC) Is the "PEXT granted" data on this spreadsheet the number of customers that were granted a PEXT?

(either JH or Carlos) ratio constant from yr to yr. ~56%

DRI.21 (KC) How does the company use the reports in response to manage payment arrangements?

(KC) Are PEXT seen as a tool to help collections or as a necessary evil?

(KC) Does the company seek to minimize PEXTs?

For those in late-payment status, FPL's philosophy is to try to keep those customers in service—minimize disconnects because it costs money to print and send the final notice and to have field collections personnel disconnect service at the premises. Late fee of 1.5% is assessed.

(VC) Are there instances when FPL waives this fee? (FPL panel, not sure who) The system is set up to bill the late charge. The company may waive the late-payment fee under certain conditions, e.g., 1 waiver in 12 months of good bill paying. Also, if a customer had an extenuating circumstance, such as a water heater leak causing a high bill, FPL may waive the late-payment fee.

I:\Interview summary One FPL Panel PA Audit.doc

EXHIBIT C

JUSTIFICATION TABLE

FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
DOCKET: No. 120251-EI - Staff's Review of Payment Arrangement Programs offered by the Florida Electric Industry
DATE: January 15, 2016

Description	No. of Pages	Line/Column	Florida Statute § 366.093(3) subsection	Affiant
Report – FPL Section	1	Pg. 8, Line 1a	(e)	Ana Babcock
FPL Interviews Summary	1	Line 1	(e)	Ana Babcock
FPL Interviews Summary	1	Lines 1a, 2a	(e)	Ana Babcock

EXHIBIT D

AFFIDAVIT

SECOND REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Public Service Commission's
Review of the Payment Arrangement Programs
offered by the Florida Electric Industry

Docket No. 120251-EI

STATE OF FLORIDA)
MIAMI DADE COUNTY)

AFFIDAVIT OF ANA BABCOCK

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

1. My name is Ana Babcock. I am currently employed by FPL as Senior Director, Revenue Management. My business address is 9250 West Flagler Street, Miami, Florida, 33174. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the documents that are included in FPL's Second Request for Extension of Confidential Classification of Information Obtained in Connection with the Florida Public Service Commission's Payment Arrangement Audit. Such documents or materials that I have reviewed and which, in whole or in part, contain or constitute information regarding FPL's internal policies, the disclosure of which would negatively impact FPL's ability to assure payment of electric bills by all customers in a fair and even manner. These materials describe the extension time period for customers whose electric bills are unpaid past the payment due date, the temperature ranges during which FPL suspends disconnects, and the qualifications for payment arrangements. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-14-0370-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of at least an additional eighteen (18) months. In addition, 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.

Ana Babcock

Ana Babcock

SWORN TO AND SUBSCRIBED before me this 13 day of January 2016 by Ana Babcock, who is personally known to me or who has produced _____ (type of identification) as identification and who did take an oath.

Debra A. Dominguez

Notary Public, State of Florida

My Commission Expires: May 7, 2016

