

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery
Clause

Docket No: 160002-EG
Date: March 23, 2016

**FLORIDA POWER AND LIGHT COMPANY'S THIRD REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION
OF INFORMATION PROVIDED PURSUANT TO AUDIT NO. 09-350-4-1**

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 Third Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 09-350-4-1 ("Confidential Information"). In support of this request, FPL states as follows:

1. On June 30, 2010 FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("June 30, 2010 Request"). By Order No. PSC-11-0181-CFO-EI, dated March 30, 2011 ("Order 0181"), the Commission granted FPL's June 30, 2010 Request. FPL adopts and incorporates by reference the June 30, 2010 Request and Order 0181.

2. By Order No. PSC-12-0596-CFO-EG, dated November 1, 2012, the Commission granted FPL's First Request for Extension of Confidential Classification.

3. On May 5, 2014 FPL filed a Second Request for Extension of Confidential Classification of the Confidential Information, which included Second Revised Exhibits A, B, C and D ("May 5, 2014 Request"). By Order No. PSC-14-0493-CFO-EG, dated September 16, 2014 ("Order 0493"), the Commission granted FPL's May 5, 2014 Request. FPL adopts and incorporates by reference the May 5, 2014 Request and Order 0493.

4. The period of confidential treatment granted by Order 0493 will soon expire. The Confidential Information that was the subject of FPL's May 5, 2014 Request and Order 0493

warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its Third Request for Extension of Confidential Classification.

5. All of the information designated in Second Revised Exhibits A and B to the May 5, 2014 Request remains confidential. Accordingly, those exhibits will not be reproduced or reattached here.

6. Included herewith and made a part hereof is Third Revised Exhibit C and Third Revised Exhibit D. Regarding Third Revised Exhibit C, all of the information listed in the May 5, 2014 Request remains confidential; that Exhibit is revised only to identify Terry Keith as a new declarant. Third Revised Exhibit D contains the declarations of Antonio Maceo, Terry Keith and Anita Sharma in support of this request.

7. 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.

8. As the declarations included in Third Revised Exhibit D indicate, the Confidential Information includes proprietary information of FPL concerning internal auditing controls, reports or notes of internal auditors or information relating to internal auditing controls. This information is protected by Section 366.093(3)(b), Fla. Stat.

9. Additionally, certain information relates to bids or other contractual data, the disclosure of which would impair the efforts of FPL and its vendors to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

10. Also, some information also relates to the competitive interest of FPL or third parties, the disclosure of which would impair the competitive business of the provider of the information. Such information is protected by Section 366.093(3)(e), Fla. Stat.

11. Lastly, certain documents contain information that relates to customer-specific account information, which if disclosed would impair FPL's competitive interests. 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, and account numbers, rates, billing determinants (kW and kWh usage), conservation savings in kW, kWh and bills. FPL treats such information as confidential and does not disclose it, except as required by law, to entities or persons other than the customer absent the customer's consent. This information is protected pursuant to Section 366.093(3)(e), Fla. Stat.

12. 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. (2015).

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 Third Request for Extension of Confidential Classification be granted.

Respectfully submitted,

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Assistant General Counsel - Regulatory
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By: s/ Maria J. Moncada
Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE
DOCKET NO. 160002-EG

I HEREBY CERTIFY that a true and correct copy of the foregoing Third Request for Extension of Confidential Classification was served by electronic mail this 23rd day of March 2016 to the following:

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By: s/ Maria J. Moncada
Maria J. Moncada

EXHIBIT C

JUSTIFICATION TABLE

THIRD REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: FPL, Energy Conservation Cost Recovery Clause
AUDIT CONTROL NO: 09-350-4-1
DOCKET NO: 160002-EG
DATE: March 23, 2016

Bold denotes new declarant.

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
9-1	Internal Audit List	4	Y	Pgs. 1-4, Col. A	(b)	A. Maceo
9-1/1	Internal Audit Review	3	Y	All	(b)	A. Maceo
41-2/2	Rate Code 86 and 168 Discrepancies Explanation	5	N			
41-2/2-1	Rate Code 86 June Sample	2	Y	Pgs. 1–2, Col. 1	(e)	T.J. Keith
41-2/2-2	Rate Code 168 June Sample	2	Y	Pgs. 1-2, Col. 1	(e)	T.J. Keith
41-2/2-3	Rate Code 168 September Sample	2	Y	Pgs. 1-2, Col. 1	(e)	T.J. Keith
41-4	Rate Code 44 and 45 Bill Sample	1	Y	Col. F	(e)	T.J. Keith
41-4/1	Rate Code 44 Rates	1	N			
41-4/1-1	Rate Code 44 Bills	5	Y	Pgs. 1-5, Lns. 2-5	(e)	T.J. Keith
41-4/1-2	Rate Code 44 Bills	5	Y	Pgs. 1-5, Lns. 2-5	(e)	T.J. Keith
41-4/1-3	Rate Code 44 Bills	5	Y	Pgs. 1-5, Lns. 2-5	(e)	T.J. Keith
41-4/2	Rate Code 45 Rates	1	N		(e)	T.J. Keith
41-4/2-1	Rate Code 45 Bills	5	Y	Pgs. 1-5, Lns. 2-5	(e)	T.J. Keith
41-4/2-2	Rate Code 45 Bills	5	Y	Pgs. 1-5, Lns. 2-5	(e)	T.J. Keith
41-4/2-3	Rate Code 45 Bills	5	Y	Pgs. 1-5, Lns. 2-5	(e)	T.J. Keith
43-1/1	Payroll Sample	8	N Y N	Pg. 1 Pg. 2, Cols. B & E, Lns. 1-16 Pg. 3, Cols. B & E, Lns. 1-14 Pgs. 4 - 8	(e)	A. Sharma
43-1/1-1	Payroll Test	2	N			
43-1/1-1/2	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 18-20, Col. C, Lns. 14, 16, 19	(e)	A. Sharma
43-1/1-1/3	Payroll Sample Back up	1	Y	Col. A, Lns. 22, 24 Cols. B & C, Ln. 19 Col. D, Ln. 18	(e)	A. Sharma
43-1/1-1/4	Payroll Sample Back up	1	Y	Col. A, Ln. 13 Col. B, Lns. 18, 20 Col. C, Ln. 14	(e)	A. Sharma
43-1/1-1/5	Payroll Sample Back up	1	Y	Col. A, Ln. 14 Col. B, Ln. 16 Col. C, Ln. 15 Col. D, Lns. 25, 27	(e)	A. Sharma
43-1/1-1/6	Payroll Sample Back up	1	Y	Col. A, Ln. 16 Col. B, Lns. 20, 22	(e)	A. Sharma
43-1/1-1/7	Payroll Sample Back up	1	Y	Col. A, Lns. 12, 19, 21	(e)	A. Sharma

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
43-1/1-1/8	Payroll Sample Back up	1	Y	Col. A, Lns. 12, 14, 16	(e)	A. Sharma
43-1/1-1/9	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 17-19 Col. C, Lns. 13, 15	(e)	A. Sharma
43-1/1-1/10	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 17-19 Col. C, Lns. 12a, 14	(e)	A. Sharma
43-1/1-1/11	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 19-21 Col. C, Lns. 14, 16 Col. D, Lns. 15, 18	(e)	A. Sharma
43-1/1-1/12	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 21-23 Col. C, Lns. 17, 19	(e)	A. Sharma
43-1/1-1/13	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 15-17 Col. C, Lns. 11a, 13	(e)	A. Sharma
43-1/1-1/15	Payroll Sample Back up	1	Y	Col. A, Lns. 1 and 20 Col. B, Lns. 12-14 Col. C, Lns. 8, 10	(e)	A. Sharma
43-1/1-1/16	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 16-21 Col. C, Lns. 12a, 15, 17-18, 21	(e)	A. Sharma
43-1/1-1/17	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 18-23 Col. C, Lns. 13, 15-17, 20	(e)	A. Sharma
43-1/1-1/18	Payroll Sample Back up	1	Y	Col. A, Ln. 12 Col. B, Ln. 13 Col. C, Lns. 14, 17	(e)	A. Sharma
43-1/1-1/19	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 6-10 Col. C, Lns. 2, 4, 6-7, 9	(e)	A. Sharma
43-1/1-1/20	Payroll Sample Back up	2	Y	Pg. 1, Col. A, Ln. 1 Col. B, Lns. 7-9 Col. C, Lns. 2, 5, 8	(e)	A. Sharma
			N	Pg. 2		
43-1/1-1/21	Payroll Sample Back up	2	Y	Pg. 1, Col. A, Ln. 1 Col. B, Lns. 24, 26, 28-30 Pg. 2, Cols. A, B & D, Ln. 17 Col. C, Lns. 5-13, 17 Col. E, Lns. 3, 5-13	(e)	A. Sharma
43-1/1-1/22	Payroll Sample Back up	1	Y	Col. A, Ln. 17 Col. B, Lns. 22, 24	(e)	A. Sharma
43-1/1-1/23	Payroll Sample Back up	1	Y	Col. A, Ln. 15 Col. B, Ln. 12	(e)	A. Sharma
43-1/1-1/24	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 21-25 Col. C, Lns. 16a, 19, 21	(e)	A. Sharma
43-1/1-1/25	Payroll Sample Back up	1	Y	Col. A, Ln. 1 Col. B, Lns. 22-24 Col. C, Lns. 17, 19, 21	(e)	A. Sharma
43-1/1-1/26	Payroll Sample Back up	1	Y	Col. A, Ln. 10 Col. B, Lns. 20, 22	(e)	A. Sharma

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
43-1/1-1/27	Payroll Sample Back up	1	Y	Col. A, Ln. 11 Col. B, Ln. 12 Col. C, Lns. 16, 18-20	(e)	A. Sharma
43-1/2-1	Cash Voucher Test	4	Y	Pg. 1, Lns. 17, 25, 61, 62 Pg. 2, Lns. 39, 41, 43, 54 Pgs. 3-4	(d), (e)	A. Sharma
43-1/2-1/1	Cash Voucher Sample Back Up	2	Y	Pg.1, Lns. 4B, 8D, 9D, 10A, 10C Pg. 2, Col. A, Lns. 5-9, 17 Col. B, Lns. 1-2, 28-29, 34 Col. C, Lns. 5-9, 19, 21	(d), (e)	A. Sharma
43-1/2-1/2	Cash Voucher Sample Back Up	2	Y	Pgs. 1-2, Ln. 1	(d), (e)	A. Sharma
43-1/2-1/3	Cash Voucher Sample Back Up	2	Y	Pgs. 1-2, Ln. 1	(d), (e)	A. Sharma
43-1/2-1/4	Cash Voucher Sample Back Up	1	Y	Col. A, Line 26 Col. B, Lns. 7-9 Col. C, Line 25	(d), (e)	A. Sharma
43-1/3-1	Journal Entry Test	3	Y	Pg. 1, Lns., 1A, 2A, 3A, 4A, 5A, 6A, 6B, 7A, 7B, 7C Pgs. 2 - 3	(d), (e)	A. Sharma
43-1/3-1/1	Journal Entry Sample Back Up	1	N			
43-1/3-1/2	Journal Entry Sample Back Up	1	N			
43-1/3-1/3	Journal Entry Sample Back Up	1	N			
43-1/3-1/4	Journal Entry Sample Back Up	1	N			
43-1/3-1/8	Journal Entry Sample Back Up	1	N			
43-1/4-1/1	Inventory Sample Back Up	6	N			
44-1/2	Proforma Payroll Schedule	1	N			
44-2/2	Proforma Payroll Schedule	1	N			
44-3/2	Proforma Payroll Schedule	1	N			
44-4/2	Proforma Payroll Schedule	1	N			
44-5/2	Proforma Payroll Schedule	1	N			
44-6/1-1	CILC Dec 08 to May 09 Report True Up	1	N			
44-6/1-2	CDR Dec 08 to May 09 Report True Up	1	N			
44-6/2	Proforma Payroll Schedule	1	N			
44-7/2	Proforma Payroll Schedule	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
44-8/2	Proforma Payroll Schedule	1	N			
44-9/2	Proforma Payroll Schedule	1	N			
44-10/2	Proforma Payroll Schedule	1	N			
44-11/2	Proforma Payroll Schedule	1	N			
44-12/1-1	CILC Jun 09 to Nov 09 Report True Up	1	N			
44-12/1-2	CDR Jun 09 to Nov 09 Report True Up	1	N			
44-12/2	Proforma Payroll Schedule	1	N			

EXHIBIT D

DECLARATIONS

THIRD REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Energy Conservation Cost Recovery
Clause

Docket No: 160002-EG

STATE OF FLORIDA)
MIAMI-DADE COUNTY)

WRITTEN DECLARATION OF **TERRY J. KEITH**

1. My name is Terry J. Keith. I am currently employed by Florida Power & Light Company ("FPL") as Director of Cost Recovery Clauses in the Regulatory Affairs Department. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents in Exhibit A, which is referenced and incorporated in FPL's Second Request for Confidential Classification of Information Obtained in Connection with Audit No. 09-350-4-1, for which I am listed as the affiant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute customer-specific account information. 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 kW, kWh and bills. FPL treats such information as confidential and does not disclose it, except as required by law, to entities or persons other than the customer absent the customer's consent. 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-14-0493-CFO-EG to render the 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. 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



TERRY J. KEITH

Date: March 22, 2016

THIRD REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery
Clause

Docket No: 160002-EG

STATE OF FLORIDA

WRITTEN DECLARATION OF ANTONIO MACEO


COUNTY OF MIAMI-DADE

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

2. I have reviewed the documents in Exhibit A, which is referenced and incorporated in FPL's Third Request for Confidential Classification of Information Obtained in Connection with Audit No. 09-350-4-1, for which I am identified as the affiant. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, contain or constitute internal auditing controls, reports or notes of internal auditors, or information relating to internal auditing reports issued in 2009. 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-14-0493-CFO-EG to render the 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. 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



ANTONIO MACEO

Date: _____

3/22/16

THIRD REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery
Clause

Docket No: 160002-EG

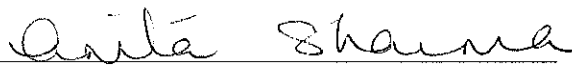
STATE OF FLORIDA)
MIAMI-DADE COUNTY) **WRITTEN DECLARATION OF ANITA SHARMA**

1. My name is Anita Sharma. I am currently employed by Florida Power & Light Company ("FPL") as Manager, Demand Side Management Cost and Performance. I have personal knowledge of the matters stated in this.

2. I have reviewed the documents in Exhibit A, which is referenced and incorporated in FPL's Third Request for Confidential Classification of Information Obtained in Connection with Audit No. 09-350-4-1 for which I am identified as the affiant. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, contain or constitute competitively sensitive information, the disclosure of which could impair the competitive business of the provider of the information. Specifically, some of the information contains information related payroll, pension and welfare rates. Additionally, some information pertains to negotiated terms with third party vendors for equipment and services related to FPL's implementation of demand side management and conversation programs. Some documents contain customer-specific account information, which if disclosed would impair FPL's competitive interests or those of its vendors. 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 kW, kWh and bills. FPL treats such information as confidential and does not disclose it, except as required by law, to entities or persons other than the customer absent the customer's consent. 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-14-0493-CFO-EG to render the 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, they 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.


ANITA SHARMA

Date: 3/22/2016