



July 1, 1998

VIA HAND DELIVERY

Ms. Blanca S. Bayò  
Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard, Room 110  
Tallahassee, FL 32399-0850

**Re: Florida Power & Light Company's Request for  
Confidential Classification of Certain Material  
Provided in Connection with the Capacity Cost  
Recovery Clause Audit  
Audit Control No. 98-094-4-1; Docket No. 980001-E1**

Dear Ms. Bayò:

In accordance with Rule 25-22.006, Florida Administrative Code, and Section 366.093, Florida Statutes, Florida Power & Light Company ("FPL") hereby submits for filing the original and fifteen (15) copies of FPL's Request for Confidential Classification in the Capacity Cost Recovery Clause Audit, including the following exhibits:

- (i) One (1) copy of Exhibit A, the confidential documents referred to in FPL's Request, submitted for filing in a separate, sealed folder or carton marked "EXHIBIT A - CONFIDENTIAL;" *06934-98*
- (ii) Two (2) copies of Exhibit B, edited versions of the same documents referred to in FPL's Request in which documents the information FPL asserts is confidential has been blocked out, submitted for filing in two separate folders each marked as "EXHIBIT B;" *06936-98*
- (iii) The original and fifteen (15) copies of Exhibit C, FPL's justification table, submitted for filing as an attachment to FPL's Request;

Ms. Blanca S. Bayò, Director  
Division of Records and Reporting  
Florida Public Service Commission  
July 1, 1998  
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(iv) The original and fifteen (15) copies of Exhibit D, consisting of affidavits in support of FPL's Request, submitted for filing as attachments to FPL's Request; and

(v) One (1) copy of Exhibit E, a computer diskette containing FPL's identification and justification matrix (in Word Perfect 5.2), submitted for filing as an attachment to FPL's request.

Pursuant to Rule 25-22.006(3)(d), FPL requests confidential treatment of the documents in Exhibit A pending disposition of FPL's Request for Confidential Classification.

Please do not hesitate to contact me should you or your Staff have any questions regarding this filing.

Respectfully submitted,



R. Wade Litchfield  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561) 691-7101

Authorized House Counsel for  
Florida Power & Light Company

RWL/bjw  
Enclosures

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of Florida Power & Light	)	
Company's Request for Confidential	)	DOCKET NO. 980001-EI
Classification in the Capacity	)	
Cost Recover Clause Audit;	)	FILED: July 1, 1998
Audit Control No. 98-094-4-1	)	

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
CERTAIN MATERIAL PROVIDED IN CONNECTION  
WITH THE CAPACITY COST RECOVERY CLAUSE AUDIT**

**NOW, BEFORE THIS COMMISSION**, through undersigned counsel, comes Florida Power & Light Company ("FPL") and, pursuant to section 25-22.006 of the Florida Administrative Code and section 366.093 of the Florida Statutes, hereby requests confidential classification of certain materials provided to the Florida Public Service Commission ("FPSC" or "Commission") staff ("Staff") in connection with the Capacity Cost Recovery Clause Audit, Audit Control No. 98-094-4-1 (the "Audit"). In support of its Request, FPL states as follows:

1. Petitioner's name and address are:

Florida Power & Light Company  
P.O. Box 029100  
Miami, Florida 33102-9100

Orders, notices, or other pleadings related to this request should be served on:

*X-106382-98 + 0636378*  
DOCUMENT NUMBER-DATE  
**06934** JUL -1 98  
FPSC-RECORDS/REPORTING

William G. Walker, III  
Vice President  
Florida Power & Light Company  
212 South Monroe Street  
Suite 810  
Tallahassee, FL 32301-1859  
(850) 224-7517

R. Wade Litchfield  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561) 691-7101

2. During the Audit, Staff requested access to various FPL internal audit reports and other documents related to capacity cost recovery. By letter dated June 18, 1998, Staff indicated its intent to retain certain workpapers for which confidential treatment previously had been requested. Pursuant to section 25-22.006(3)(a), FPL was given twenty one days from the audit exit conference, or until July 2, 1998, within which to file a formal Request for Confidential Classification with respect to such workpapers. FPL hereby makes such request.

3. The following exhibits are included herewith and made a part hereof:

a. Composite Exhibit A consists of all documents for which FPL seeks confidential treatment, whether in whole or in part. All information in Exhibit A that FPL asserts is entitled to confidential treatment has been highlighted. Composite Exhibit A is submitted separately in a sealed folder or carton marked "CONFIDENTIAL."

b. Composite Exhibit B consists of edited versions of all documents for which FPL seeks confidential treatment. All information FPL asserts is entitled to confidential treatment has been blocked out in Composite Exhibit B.

c. Exhibit C is a table containing a line-by-line and page-by-page identification of the information for which confidential treatment is sought, and, with regard to each document or portions thereof, references to the specific statutory basis or bases for the claim of confidentiality and to the affidavits in support of the requested

classification. Exhibit C is sometimes referred to hereinafter as the "Justification Table."

d. Exhibit D includes the affidavits of Mario Villar, Rick Del Cueto, and Carmen M. Perez.

e. Exhibit E is a computer diskette containing FPL's Justification Table (Exhibit C).

4. Pursuant to section 366.093, FPL seeks confidential protection for the information highlighted in Exhibit A. FPL submits that such information is proprietary confidential business information within the meaning of section 366.093(3). 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.

5. The statutory bases for FPL's assertion of confidentiality with regard to each document or portion thereof are set forth in the Justification Table under the column titled "FLORIDA STATUTE 366.093(3)." The letters (a) through (f) refer to subsections of section 366.093(3), as applicable. Support for FPL's Request for Confidential Classification of the referenced material is provided through the affidavits of Mario Villar, Rick Del Cueto, and Carmen M. Perez, included herewith as Exhibit D. The Justification Table

identifies the affiant attesting to the basis for FPL's assertion of confidentiality with regard to each document or portion thereof.

6. Upon a finding by the Commission that the material in Exhibit A for which FPL seeks confidential treatment is proprietary confidential business information within the meaning of section 366.093(3), pursuant to section 366.093(4) such materials should not be declassified for a period of at least 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.

**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 Request for Confidential Classification be granted.

Respectfully submitted,

  
R. WADE LITCHFIELD  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561) 691-7101

Authorized House Counsel for  
Florida Power & Light Company

**Exhibit C**

**Justification Table**

**LIST OF CONFIDENTIAL WORKPAPERS**

**Capacity Cost Recovery Clause Audit**

**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Workpapers  
**AUDIT:** Capacity Cost Recovery Clause  
**DATE:** June 25, 1998  
**AUDIT CONTROL NO:** 98-094-4-1

WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE	AFFIANT
					366.093(3) Subsection:	
1	Report	6	Y	All 6 pages	(e)	M. Villar
9	Internal Audits	3	Y	All 3 pages	(b)	R. Del Cueto
9-1	Energy Audit	13	Y	All 13 pages	(b)	C. Perez
9-2	Real Time Pricing Audit	1	Y	All of page 1	(b)	R. Del Cueto
10	Document Request	7	N	--	--	--
12-1/2- 4/1-1/1	Actual Transmission Service Billing Summary	9	Y	All 9 pages	(e)	M. Villar
12-1/2- 5/1-1	Transmission Service Adjustment	2	Y	All 2 pages	(e)	M. Villar
12-1/5-1- 1/1	Actual Transmission Service Billing Summary	3	Y	All 3 pages	(e)	M. Villar
12-1/2-7	Billing Summary	2	Y	All 2 pages	(e)	M. Villar
12-1/3	Audit Disclosure for Schedule C Sales	3	N	--	--	--
40-3	Exceptions	6	Y	All 6 pages	(e)	M. Villar
43	Summary of Unit Power Capacity Charges	2	Y	All 2 pages	(d), (e)	M. Villar



**Capacity Cost Recovery Clause**  
**Audit Control No. 98-094-4-1**

<b>WKPAPER NO.</b>	<b>DESCRIPTION</b>	<b>NO. OF PAGES</b>	<b>CONF. Y/N</b>	<b>LINE NO./ COL. NO.</b>	<b>FLORIDA STATUTE 366.093(3) Subsection:</b>	<b>AFFIANT</b>
43-1	UPS Capacity Charges	2	Y	All 2 pages	(d), (e)	M. Villar
43-1/1	Check Request	1	Y	All of page 1	(d), (e)	M. Villar
43-1/1-1	Southern Company Services Invoice	1	Y	All of page 1	(d), (e)	M. Villar
43-1/1-2	Actual Capacity Charges	1	Y	All of page 1	(d), (e)	M. Villar
43-1/1-3	Payment	1	Y	All of page 1	(d), (e)	M. Villar
43-1/1-4	UPS Capacity Interest Calculation	7	Y	All 7 pages	(d), (e)	M. Villar
43-1/2	UPS Transmission True-Up	1	Y	All of page 1	(d), (e)	M. Villar
43-1/2-1	UPS 1996 Transmission True-Up	5	Y	All 5 pages	(d), (e)	M. Villar
43-1/2-1/1	Determination of Monthly Transmission Capacity Charges	2	Y	All 2 pages	(d), (e)	M. Villar
43-1/2-1/1-1	1988 Agreement	3	N	--	--	--

Capacity Cost Recovery Clause  
Audit Control No. 98-094-4-1

WK PAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
43-1/2-1/1-2	Determination of Monthly Investment & Expense Components	12	Y	All 12 pages	(d), (e)	M. Villar
43-1/2-2	Capacity Interest Calculation	1	N	--	--	--
43-1/2-2.1	Transmission Adjustment - Interest Calculation	1	Y	All of page 1	(d), (e)	M. Villar
43-1/2-2/2	Interest Calculations	1	Y	All of page 1	(d), (e)	M. Villar
43-1/2-2/2-1	Interest Calculations	1	Y	All of page 1	(d), (e)	M. Villar
43-1/3-1	Determination of Monthly Capacity Charges	16	Y	All 16 pages	(d), (e)	M. Villar
43-1/3-1/1	Average Transmission Loss Percentage	1	Y	All of page 1	(d), (e)	M. Villar
43-1/3-2	Determination of Monthly Capacity Charges	13	Y	All 13 pages	(d), (e)	M. Villar
43-1/3-3	Determination of Monthly Capacity Charges	13	Y	All 13 pages	(d), (e)	M. Villar

Capacity Cost Recovery Clause  
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WK PAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
43-1/3-4	Determination of Monthly Capacity Charges	16	Y	All 16 pages	(d), (e)	M. Villar
43-1/3-5	Determination of Monthly Capacity Charges	13	Y	All 13 pages	(d), (e)	M. Villar
43-1/3-6	Determination of Monthly Capacity Charges	13	Y	All 13 pages	(d), (e)	M. Villar
44 page 1	Summary of SJRPP Capacity Charges	1	Y	All of page 1	(d), (e)	M. Villar
44 page 2	Summary of SJRPP Capacity Charges	1	Y	All of page 1	(d), (e)	M. Villar
44 page 3	Summary of SJRPP Capacity Charges	1	Y	All of page 1	(d), (e)	M. Villar
44A	Exceptions 1, 2, and 3	6	Y	All 6 pages	(e)	M. Villar
44-1	Reconciliation of SJRPP Capacity Charges of backup to the filing	1	Y	All of page 1	(d), (e)	M. Villar
44-1 page 2	Explanation of difference between filing and backup for 3/98	1	Y	All of page 1	(d), (e)	M. Villar

Capacity Cost Recovery Clause  
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WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
44-1/1	SJRPP Purchased Power Accruals 4/97-3/98	12	Y	All 12 pages	(d), (e)	M. Villar
44-1/2	JEA's Invoices	14	Y	All 14 pages	(d), (e)	M. Villar
44-1/2-1 page 1	Debt Service Transfer Payment	1	Y	All of page 1	(d), (e)	M. Villar
44-1/2-1 page 2	Debt Service Billing 128	1	Y	All of page 1	(d), (e)	M. Villar
44-1/2-1 page 3	Debt Service Transfer Payment for March 1998	1	Y	All of page 1	(d), (e)	M. Villar
44-1/2-1 page 4	Semi-Annual Debt Service Deposit R.R. 10/1/97	1	Y	All of page 1	(d), (e)	M. Villar
44-1/2-1 page 5	Semi-Annual Debt Service Deposit - March 1998	1	Y	All of page 1	(d), (e)	M. Villar
44-1/2-1/1 page 1	Schedule of Debt Service Year 96/97	1	N	--	--	--
44-1/2-1/1 page 2	SJRPP Revenue Requirement 3/6/97	1	Y	All of page 1	(d), (e)	M. Villar
44-1/2- 1/1-1	JEA's Outstanding Debt Service	1	N	--	--	--

Capacity Cost Recovery Clause  
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WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
44-1/3 page 1	Debt Service Accruals	1	Y	All of page 1	(d), (e)	M. Villar
44-1/3 page 2	Debt Service Accruals	1	Y	All of page 1	(d), (e)	M. Villar
44-1/3 page 3	Backup for Debt Service Accruals	1	Y	All of page 1	(d), (e)	M. Villar
44-1/3 page 4	SJRPP Purchased Power Accruals Unit 2	1	Y	All of page 1	(d), (e)	M. Villar
44-1/3-1	SJRPP Revenue Requirement - Revised Version 2/1/96	2	Y	All 2 pages	(d), (e)	M. Villar
44-1/3-2	SJRPP Revenue Requirement - Revised Version 3/6/97	2	Y	All 2 pages	(d), (e)	M. Villar
44-1/3-3	Backup for True-Up of Debt Service for Sept. 1997	4	Y	All 4 pages	(d), (e)	M. Villar
44-1/4	Payment in Lieu of Property Taxes	2	Y	All 2 pages	(d), (e)	M. Villar
44-1/5 page 1	Transmission Capability Service	1	Y	All of page 1	(d), (e)	M. Villar

Capacity Cost Recovery Clause  
Audit Control No. 98-094-4-1

WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
44-1/5 page 2	Transmission Capability Service	1	Y	All of page 1	(d), (e)	M. Villar
44-1/5-1	Transfer Payment for Transmission Capability Service - 3/98	2	Y	All 2 pages	(d), (e)	M. Villar
44-1/5-2	Transfer Payment for Transmission Capability Service - 9/97	2	Y	All 2 pages	(d), (e)	M. Villar
44-1/5-3	Recalculation of Sept. 97 True-Up for Transmission Capability Service	3	Y	All 3 pages	(d), (e)	M. Villar
44-1/5-4	Backup for Calculation of Transmission Capability Service Accruals	2	Y	All 2 pages	(d), (e)	M. Villar
44-1/6	Dismantlement Accrual	1	Y	All of page 1	(d), (e)	M. Villar
44-1/7	Bond Resolution Expense	2	Y	All 2 pages	(d), (e)	M. Villar
44-1/8	Bond Resolution Expense	2	Y	All 2 pages	(d), (e)	M. Villar

Capacity Cost Recovery Clause  
Audit Control No. 98-094-4-1

WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
44-1/9	Bond Resolution Expense	3	Y	All 3 pages	(d), (e)	M. Villar
44-1/10	JEA's Carrying Cost Inventory 4/97	2	Y	All 2 pages	(d), (e)	M. Villar
44-1/11	JEA's Carrying Cost Inventory 11/97	2	Y	All 2 pages	(d), (e)	M. Villar
44-2	CCRA Recovery Period	2	Y	All 2 pages	(d), (e)	M. Villar
44-3/1	Cost of Operations	2	Y	All 2 pages	(d), (e)	M. Villar
44-3/2	Cost of Operations - 6/97	2	Y	All 2 pages	(d), (e)	M. Villar
44-3/3	Cost of Operations - 7/97	4	Y	All 4 pages	(d), (e)	M. Villar
44-3/4	Cost of Operations - 8/97	2	Y	All 2 pages	(d), (e)	M. Villar
44-3/5	Cost of Operations - 9/97	2	Y	All 2 pages	(d), (e)	M. Villar
44-3/6	Cost of Operations - 10/97	2	Y	All 2 pages	(d), (e)	M. Villar
44-3/7	Cost of Operations - 11/97	2	Y	All 2 pages	(d), (e)	M. Villar
44-3/8	Cost of Operations - 12/97	2	Y	All 2 pages	(d), (e)	M. Villar

**Capacity Cost Recovery Clause**  
**Audit Control No. 98-094-4-1**

<b>WK PAPER NO.</b>	<b>DESCRIPTION</b>	<b>NO. OF PAGES</b>	<b>CONF. Y/N</b>	<b>LINE NO./ COL. NO.</b>	<b>FLORIDA STATUTE 366.093(3) Subsection:</b>	<b>AFFIANT</b>
44-3/9	Cost of Operations - 1/98	2	Y	All 2 pages	(d), (e)	M. Villar
44-3/10	Cost of Operations - 2/98	2	Y	All 2 pages	(d), (e)	M. Villar
44-3/11	Cost of Operations - 3/98	2	Y	All 2 pages	(d), (e)	M. Villar
44-3/12	Cost of Operations - 4/98	1	Y	All of page 1	(d), (e)	M. Villar
44-3/13	Cost of Operations - 5/98	1	Y	All of page 1	(d), (e)	M. Villar
45-2	Summary of QF Capacity Charges	2	Y	All 2 pages	(d), (e)	M. Villar
45-2/1	Reduction to Capacity	2	Y	All 2 pages	(d), (e)	M. Villar
45-2/2	Reduction to Capacity	1	Y	All of page 1	(d), (e)	M. Villar
45-2/3	Reduction to Capacity	1	Y	All of page 1	(d), (e)	M. Villar
49	Transmission of Electricity by Others - FPL Sales	1	N	--	--	--
49-2/1-1	Transmission Service Charges Invoice	3	Y	--	--	--



Capacity Cost Recovery Clause  
 Audit Control No. 98-094-4-1

WK PAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
49-2/2-1	Transmission Service Charges Invoice	7	Y	--	--	--
49-2/3-1	Transmission Service Charges Invoice	7	Y	--	--	--
49-2/4-1	Transmission Service Charges Invoice	16	Y	--	--	--
49-2/5-1	Transmission Service Charges Invoice	8	Y	--	--	--
49-2/6-1	Transmission Service Charges Invoice	6	Y	--	--	--
49-2/7-1	Transmission Service Charges Invoice	21	Y	--	--	--
49-2/8-1	Transmission Service Charges Invoice	14	Y	--	--	--
49-2/9-1	Transmission Service Charges Invoice	4	Y	--	--	--

Capacity Cost Recovery Clause  
 Audit Control No. 98-094-4-1

WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
49-2/10-1	Transmission Service Charges Invoice	5	Y	--	--	--
49-2/11-1	Transmission Service Charges Invoice	6	Y	--	--	--
49-2/12-1	Transmission Service Charges Invoice	16	Y	--	--	--

**Exhibit D**

**AFFIDAVIT OF  
RICK DEL CUETO**

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of Florida Power & Light )  
Company's Request for Confidential ) DOCKET NO. 980001-EI  
Classification in the Capacity )  
Cost Recover Clause Audit; ) FILED: July 1, 1998  
Audit Control No. 98-094-4-1 )

STATE OF FLORIDA )  
 ) AFFIDAVIT OF RICK DEL CUETO  
COUNTY OF DADE )

**BEFORE ME**, the undersigned authority, personally appeared Rick Del Cueto who, being first duly sworn, deposes and says:

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

2. With respect to Exhibit-C, I have reviewed the documents and information for which I am listed as Affiant and which are included in Exhibit A to FPL's Request for Confidential Classification. Such documents or materials asserted by FPL to proprietary confidential business information, as noted on Exhibit C, contain or constitute: (i) information relating to competitive interests, the disclosure of which would impair the competitive business of FPL; and/or (ii) internal auditing controls and reports of internal auditors or information relating to same. FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 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. Affiant says nothing further.

  
Rick Del Cueto

SWORN TO AND SUBSCRIBED before me this 26 day of June, 1998, by Rick Del Cueto, who is personally known to me or who has produced PERSONALLY KNOWN (type of identification) as identification and who did take an oath.

  
Notary Public, State of Florida

My Commission Expires:



Meira Hernandez  
MY COMMISSION # CC528908 EXPIRES  
May 25, 2000  
BONDED THROUGH TRICOR FAIR INSURANCE, INC.

Exhibit D

**AFFIDAVIT OF  
CARMEN M. PEREZ**

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of Florida Power & Light )  
Company's Request for Confidential ) DOCKET NO. 980001-EI  
Classification in the Capacity )  
Cost Recover Clause Audit; ) FILED: July 1, 1998  
Audit Control No. 98-094-4-1 )

STATE OF FLORIDA )  
 ) AFFIDAVIT OF CARMEN M. PEREZ  
COUNTY OF DADE )

**BEFORE ME**, the undersigned authority, personally appeared Carmen M. Perez who, being first duly sworn, deposes and says:

1. My name is Carmen M. Perez. I am currently employed by Florida Power & Light Company ("FPL") as Assistant Controller. I have personal knowledge of the matters stated in this affidavit.



2. With respect to Exhibit C, I have reviewed the documents and information for which I am listed as Affiant and which are included in Exhibit A to FPL's Request for Confidential Classification. Such documents or materials that I have reviewed and which are asserted by FPL to proprietary confidential business information, as noted on Exhibit C, contain or constitute internal auditing controls and reports of internal auditors, or information relating to same. FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 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. Affiant says nothing further.

  
Carmen M. Perez

~~SWORN TO AND SUBSCRIBED~~ before me this 26<sup>th</sup> day of June, 1998, by  
Carmen M. Perez, 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  
 NELLY PALMA  
EXPIRES: January 25, 2002  
Bonded Thru Notary Public Underwriters

My Commission Expires: 1/25/2002




**Exhibit D**

**AFFIDAVIT OF  
MARIO VILLAR**

4. Affiant says nothing further.

  
\_\_\_\_\_  
Mario Villar

**SWORN TO AND SUBSCRIBED** before me this 26<sup>th</sup> day of June, 1998, by Mario Villar, 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:

