



ORIGINAL

July 6, 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 Fuel Cost  
Recovery Clause Audit  
Audit Control No. 98-022-4-1; Docket No. 980001-EI**

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 Fuel Cost Recovery Clause Audit, including the following exhibits: 07077-98

- (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;" 07078-98
- (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;" 07079-98
- (iii) The original and fifteen (15) copies of Exhibit C, FPL's justification and identification 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  
June 25, 1998  
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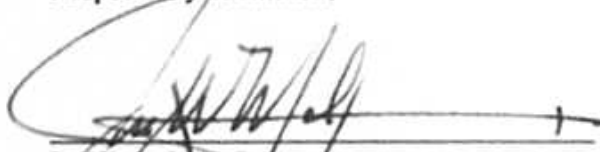
(iv) The original and fifteen (15) copies of Exhibit D, consisting of affidavits in support of FPL's Request, submitted for filing as attachments to FPL's Request; and

(v) One (1) copy of Exhibit E, a computer diskette containing FPL's identification and justification table (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  
100 Universe Boulevard  
Juno Beach, Florida 33408-0420

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 Classification in the Fuel Cost Recovery Clause Audit; Audit Control No. 98-022-4-1	)	)	DOCKET NO. 980001-EI
	)	)	FILED: July 6, 1998

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
CERTAIN MATERIAL PROVIDED IN CONNECTION  
WITH THE FUEL 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 Fuel Cost Recovery Clause Audit, Audit Control No. 98-022-4-1 (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:

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 19, 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 6, 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 Scott Craig, Rick Del Cueto, Jack Leon, Robert Lippman, Carmen M. Perez, Mario Villar, and Claude Villard.

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. FPL requests that the fuel oil pricing information in Exhibit C not be declassified for a period of at least twenty-four months. This is the maximum period of time during which FPL fuel oil contracts are in effect. Disclosure prior to the identified date the declassification could impair FPL's ability in the future to negotiate favorable fuel oil contracts, to the detriment of FPL's customers. FPL asserts that good cause thus exists for protection

of this information from disclosure beyond the 18-month period specified in § 366.093(4), F.S. (1995), and Rule 25-22.006(9)(a), F.A.C. The confidential material (Exhibit C) should be returned to FPL when the Commission no longer needs the information to conduct its business, in accordance with § 366.093(4), F.S. (1995), and Rule 25-22.006(9)(b), F.A.C.

6. FPL requests that attorney-client privilege information in Exhibit C not be declassified. We request that this information retain its confidential classification indefinitely.

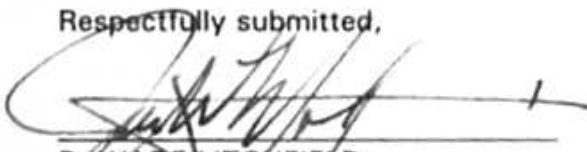
7. The statutory bases for FPL's assertion of confidentiality with regard to each document or portion thereof are set forth in the Justification Table under the column titled "FLORIDA STATUTE 366.093(3)." The letters (a) through (f) refer to subsections of section 366.093(3), as applicable. Support for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

8. 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,

  
for 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**

**Fuel Cost Recovery Clause Audit**



## EXHIBIT C

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Workpapers  
**AUDIT:** Fuel Cost Recovery Clause  
**DATE:** June 29, 1998  
**AUDIT CONTROL NO:** 98-022-4-1

WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE	AFFIANT
					366.093(3) Subsection:	
9	List of Internal Audits	4	Y		(b)	R. Del Cueto
9-1	Internal Audit Notes	1	Y		(b)	R. Del Cueto
9-2	Internal Audit Notes	1	Y		(b)	R. Del Cueto
9-3	Internal Audit Notes	2	Y		(b)	R. Del Cueto
9-4	Internal Audit Notes	2	Y		(b)	R. Del Cueto
9-5	Internal Audit Notes	1	Y		(b)	R. Del Cueto
9-6	Internal Audit Notes	1	Y		(b)	R. Del Cueto
9-7	Internal Audit Notes	2	Y		(b)	R. Del Cueto
9-7/1	Wireless Process Flow	1	Y		(b)	C. Perez
9-7/2	Wireless/Fiber Leasing Operating Results 2/97	7	Y		(b)	C. Perez
9-7/3	Wireless/Fiber Leasing Operating Results 12/97	7	Y		(b)	C. Perez
9-8	Internal Audit Notes	2	Y		(b)	R. Del Cueto
9-9	Internal Audit Notes	2	Y		(b)	R. Del Cueto
9-10	Internal Audit Notes	3	Y		(b)	R. Del Cueto

Exhibit C

Fuel Cost Recovery Clause  
Audit Control No. 98-022-4-1

WK PAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
9-11	Internal Audit Notes	2	Y		(b)	R. Del Cueto
9-12	Internal Audit Notes	1	Y		(b)	R. Del Cueto
9-13	Internal Audit Notes	3	Y		(b)	R. Del Cueto
9-14	Internal Audit Notes	1	Y		(b)	R. Del Cueto
9-15	Internal Audit Notes	1	Y		(b)	R. Del Cueto
9-16	Internal Audit Notes	1	Y		(b)	R. Del Cueto
9-17	Internal Audit Notes	1	Y		(b)	R. Del Cueto
9-18	Internal Audit Notes	1	Y		(b)	R. Del Cueto
43-2	Sample of Accounts 500's	5	Y (pp. 1, 2, & 3) N (pp. 4, 5)	A, B --	(d) --	B Lippman --
43-2/3-1	Sample Item 24	2	N	--	--	--
43-2/3-2	Sample Item 29	2	N	--	--	--
43-2/3-3	Sample Item 49	1	N	--	--	--
43-2/3-4	Sample Item 56	1	N	--	--	--
43-2/4	Sample Item 3	3	N	--	--	--
43-2/5	Sample Item 6	3	N	--	--	--
43-2/6	Sample Item 28	3	N	--	--	--
43-2/7	Sample Item 34	2	N	--	--	--
43-2/8	Sample Item 36	2	N	--	--	--

**Fuel Cost Recovery Clause  
Audit Control No. 98-022-4-1**

<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>
43-2/9	Sample Item 54	2	N	--	--	--
43-2/10	Sample Item 9	3		N	--	--
43-2/11	Sample Item 27	2	N	--	--	B Lippman
43-2/11-1	Sample Item 27	1	N	--	--	B Lippman
43-2/12	Sample Item 31	1	N	--	--	B Lippman
43-2/12-1	Sample Item 31	1	N	--	--	B Lippman
43-2/13	Sample Item 38	2	N	--	--	B Lippman
43-2/13-1	Sample Item 38	1	N	--	--	B Lippman
43-2/13-2	Sample Item 38	1	N	--	--	B Lippman
43-3	Computation of Average Unit Cost	30	N	--	--	--
43-4	Sample of Accounts 151	7	Y (p. 3); pp. 4, 5 & 6) N (pp. 1, 2, & 7)	Col. A & B Col. A only --	(d) --	B Lippman --
43-4/3	Sample Item 56	1	N	--	--	B Lippman
43-4/3-1	Sample Item 56	1	N	--	--	B Lippman
43-4/4	Sample Item 69	1	N	--	--	--
43-4/4-1	Sample Item 69	1	N	--	--	--

**Fuel Cost Recovery Clause  
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<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>
43-4/5	Sample Item 57	1	N	--	--	--
43-4/5-1	Natural Gas Prices	1	N	--	--	--
43-4/5-1/1	Monthly Gas Closing Report	1	N	--	--	--
43-4/5- 1/1-1	Natural Gas Sales Summary	1	N	--	--	--
43-4/5- 1/1-2	Detail of Invoices	6	N	--	--	--
43-4/5- 1/1-2/1	FGT Invoices	1	N	--	--	--
43-4/5- 1/1-2/1-1	Delivery Authorization	2	N	--	--	--
43-4/5- 1/1-2/1-2	FGT Invoice	2	N	--	--	--
43-4/5- 1/1-2/1-3	Natural Gas Purchases, Terms and Conditions	2	N	--	--	--
43-4/5- 1/1-3	FGT Transportation	1	N	--	--	--
43-4/5- 1/1-3/1	FGT Transportation	3	N	--	--	--
43-4/5- 1/1-3/2	FGT Transportation	1	N	--	--	--

**Fuel Cost Recovery Clause**  
**Audit Control No. 98-022-4-1**

<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>
43-4/5-1/1-3/3	FGT Transportation	3	N	--	--	--
43-4/5-1/1-3/4	FGT Transportation	2	N	--	--	--
43-4/5-1/1-3/5	FGT Transportation	6	N	--	--	--
43-4/5-1/1-4	FGT	5	N	--	--	--
43-4/5-1/1-5	Arms Invoices Procedures	3	N	--	--	--
43-4/5-1/1-5/1	Arms Invoices Procedures	1	N	--	--	--
43-4/5-1/1-5/2	Imbalance Procedures	3	N	--	--	--
43-4/5-2	Consumption Costs	1	N	--	--	--
43-4/5-3	Gas Requisitions	1	N	--	--	--
43-4/5-4	Gas Adjustment	1	N	--	--	--
43-4/6	Coastal Invoice	1	Y	Col. A & B; lines 1-3	(d)	B Lippman
43-4/6-1	Testing Service	3	N	--	--	--
43-4/6-2	Price Calculation	1	Y		(d)	B Lippman

Exhibit C

Fuel Cost Recovery Clause  
Audit Control No. 98-022-4-1

WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
43-4/6-3	Delivery Letter	2	N	--		--
43-4/6-4	Contract	11	Y		(d)	B Lippman
43-4/7	Texaco Invoice	1	Y	Lines 1-5	(d)	B Lippman
43-4/7-1	Purchase Agreement	2	Y	Col. A & B	(d)	B Lippman
43-4/7-2	Price Calculation	1	Y		(d)	B Lippman
43-4/7-3	Delivery Letter	3	N	--	--	--
43-4/8	Invoice	1	Y	Lines 1-7	(d)	B Lippman
43-4/8-1	Spot Oil Evaluation	2	Y	Col. A, B & C	(d)	B Lippman
43-4/8-2	Price Calculation	1	Y		(d)	B Lippman
43-4/8-3	Testing Service	1	N	--	--	--
43-6/2-3	Aerial Survey SJRPP	2	N	--	--	--
43-6/4-3	Aerial Survey SJRPP	3	N	--	--	--
43-6/6-2	Variance Calculation	2 1	Y N	Col. A, B & C --	(d), (e) --	B Lippman --
43-6/6-2/1	Variance Calculation	1	N	--	--	--
43-6/6- 2/1-1	Variance Calculation	2	N	--	--	--

**Fuel Cost Recovery Clause  
Audit Control No. 98-022-4-1**

<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>
43-6/6- 2/1-1/1	Moisture % Calculation	2	N	--	--	--
43-6/6- 2/1-1/2	Aerial Survey	1	Y	Col. A	(c)	B Lippman
43-6/6- 2/1-1/2-1	Aerial Survey	3	N	--	--	--
43-6/6- 2/1-1/2-2	Georgia Power Order	3	N	--	--	--
43-6/6-3	Variance Calculation	2 1 (p. 3)	Y N	Col. A, B & C --	(d), (e) --	B Lippman --
43-6/6-3/1	Variance Calculation	1	N	--	--	--
43-6/6- 3/1-1	Variance Calculation	1	N	--	--	--
43-6/6- 3/1-1/1	Moisture % Calculation	2	N	--	--	--
43-6/6- 3/1-1/2	Aerial Survey	1	Y	Col. A	(c)	B Lippman
43-6/6- 3/1-1/2-1	Aerial Survey	3	N	--	--	--
43-6/6-4	Variance Calculation	2 1 (p. 3)	Y N	Col. A, B & C --	(d), (e) --	B Lippman --

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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
43-6/6-4/1	Variance Calculation	1	N	--	--	--
43-6/6- 4/1-1	Variance Calculation	1	N	--	--	--
43-6/6- 4/1-1/1	Moisture % Calculation	2	N	--	--	--
43-6/6- 4/1-1/2	Aerial Survey	1	Y	Col. A	(e)	B Lippman
43-6/6- 4/1-1/2-1	Aerial Survey	3	N	--	--	--
43-6/6-5	Variance Calculation	2 1 (p. 3)	Y N	Col. A, B & C --	(d) (e) --	B Lippman --
43-6/6-5/1	Variance Calculation	1	N	--	--	--
43-6/6- 5/1-1	Variance Calculation	1	N	--	--	--
43-6/6- 5/1-1/1	Moisture % Calculation	2	N	--	--	--
43-6/6- 5/1-1/2	Aerial Survey	1	Y	Col. A	(e)	B Lippman
43-6/6- 5/1-1/2-1	Aerial Survey	3	N	--	--	--



**Fuel Cost Recovery Clause  
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<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>
44/3/2	Information Re: Disposal Costs	1	N	--	--	--
44-3/2-1	Invoice Re: Disposal Costs	26	N	--	--	--
44-3/2-2	Calculation of Disposal Rate	3	N	--	--	--
44-3/2-4	DOE Disposal Cost Information	1	N	--	--	--
44-3/2-5	Notes Re: Disposal Costs	1	N	--	--	--
44-3/2-6	FPL Memo Re: Disposal Costs	2	N	--	--	--
44-4/3	Invoice Re: D&D Fund	14	Y (pp. 2-8)  N (pp.1, 9- 14)	--	(d)  --	C Villard  --
44-4/5	D&D Payments	1	N	--	--	--
44-4/5-1	D&D Payment Information	1	N	--	--	--
44-5	Nuclear Purchases	1	N	--	--	--
44-5/1	Nuclear Purchases	2	N	--	--	--
44-5/2	Nuclear Purchases	2	N	--	--	--

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WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
44-5/3	Nuclear Purchases	2	Y	page 2, Lines 1&2 page 1, Col. A; page 2, lines 3,4,&5	(d) (d)	J Leon C Villard
44-5/4	Nuclear Purchases	2	Y	page 2, lines 1&2 page 1 Col. A & B; page 2, lines 3 - 6	(d) (d)	J Leon C Villard
44-5/4-1	Invoice for Nuclear Purchases	4	Y (pp. 1, 2)  N (pp. 3, 4)	page 1, Col. A, B & C; page 1, Lines 1-13 --	(d)  --	C Villard  --
44-5/4-1/1	Notes from USEC Contract	1	Y	Line 1	(d)	C Villard
44-5/4- 1/1-1	USEC Information	7	Y (pp. 1, 2, 7)  N (pp. 3-6)	page 1, lines 1 - 14; page 2, lines 1- 7; page 7, Col. A & B --	(d)  --	C Villard  --
44-5/4-2	Invoice Re: Nuclear Purchases	2	Y	page 1, col. A, B, C & D; page 2, lines 1- 13	(d)	C Villard

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44-5/4-3	Invoice Re: Nuclear Purchases	2	N	--	--	--
44-5/4-4	Invoice Re: Nuclear Purchases	3	Y	All lines	(c)	J Leon
44-5/4-5	Invoice Re: Nuclear Purchases	3	Y (p. 3) N (pp. 1&2)	page 3	(d), (e)	C Villard S Craig
44-5/4-6	Invoice Re: Nuclear Purchases	1	N	--	--	--
44-5/4-7	Invoice Re: Nuclear Purchases	1	N	--	--	--
44-5/5	Nuclear Purchases	2	Y	page 1, Col. A & B; page 2 Col. A-E	(d)	C Villard
44-5/5-1	Invoice Re: Nuclear Purchases	1	N	--	--	--
44-5/5-2	Invoice Re: Nuclear Purchases	1	N	--	--	--
44-5/5-3	Invoice Re: Nuclear Purchases	2	N	--	--	--
44-5/5-4	Invoice Re: Nuclear Purchases	1	N	--	--	--
44-5/5-5	Invoice Re: Nuclear Purchases	2	Y	page , Col. A & B; page 2, Lines 1- 3	(d)	C Villard

Exhibit C

Fuel 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:	AFFILIANT
44-5/5-6	Invoice Re: Nuclear Purchases	1	Y	Col. A & B	(d)	C Villard
44-5/5-7	Information from Siemens Contract	1	Y	Line 1	(d)	C Villard
44-5/5-7/1	Invoice Re: Nuclear Purchases	1	Y	Lines 1 - 5	(d)	C Villard
44-5/5-7/1P2	Information Re: Siemens Contract	1	Y	Col. A, B & C	(d)	C Villard
44-5/5-7/2	Information Re: Siemens Contract	1	Y	Lines 1 - 18	(d)	C Villard
44-5/5-7/2-1	Indices	1	N	--	--	--
44-5/5-7/2-2	Indices	1	N	--	--	--
44-5/5-7/2-3	Notes from Siemens Contract	1	Y	Lines 1 - 16	(d)	C Villard
44-5/5-7/2-4	FPL Memo Re: Siemens Contract	2	Y	page 1, lines 1 - 6; page 2, lines 1 - 11	(d)	C Villard
44-5/5-8	Invoice Re: Nuclear Purchases	1	Y	Lines 1 - 7	(d)	C Villard
44-5/5-9	Invoice Re: Nuclear Purchases	1	N	--	--	--

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WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
44-5/6	Nuclear Purchases	2	N	--	--	--
44-5/7	Nuclear Purchases	2	Y (p. 2) N (p. 1)	Lines 1 - 3 --	(d) --	C Villar --
44-5/8	Nuclear Purchases	2	N	--	--	--
44-5/9	Notes from USEC Contract	1	Y	Lines 1 - 6	(d)	C Villar
44-6/4	Notes from Nuclear Fuel Lease Contracts	5	N	--	--	--
45-3	Backup for A-6	1	Y		(d), (e)	M Villar
45-4	Power Sold	3	Y		(d)	M Villar
45-4/1	OS Economy Interchange	2	Y		(d)	M Villar
45-4/2	Economy Interchange SOCO	2	Y		(d)	M Villar
45-4/3	Economy Non Firm	2	Y		(d)	M Villar
45-4/3-1	OS Sale Backup	1	Y		(d)	M Villar
45-4/3-1/1	Sale Backup	3	Y		(d)	M Villar
45-4/4	Economy Schedule C Backup	1	Y		(d)	M Villar

**Fuel Cost Recovery Clause  
Audit Control No. 98-022-4-1**

<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>
46-1	Backup for A7- Accruals for Power Sales	1	Y		(d)	M Villar
46-1/1	SJRPP Energy Payment	2	Y		(d), (c)	M Villar
46-1/1-1	JEA Energy Produced	2	Y		(d)	M Villar
46-1/1-2	Interchange Management System Screen	2	Y		(d)	M Villar
46-1/2	Daily Energy Transaction	1	Y		(d)	M Villar
46-1/2-1	Interchange Management System Screen	2	Y		(d)	M Villar
47	Summary of QF Capacity Payment	4	Y		(d)	M Villar
47-1	Accruals for Qualifying Facilities	1	Y		(d)	M Villar
47-1/1	Daily Energy Payment Summary	2	Y		(d)	M Villar
47-1/2	Billing Statement	2	Y		(d)	M Villar
47-1/2-1	Journal Entry	1	Y		(d)	M Villar

**Fuel Cost Recovery Clause**  
**Audit Control No. 98-022-4-1**

<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>
47-1/2-2	QF Monthly Billing Statement	2	Y		(d)	M Villar
47-1/2-2/1	Daily Energy Payment Summary	1	Y		(d)	M Villar
47-1/2-2/1-1	QF Energy Payment Calculation	31	Y		(d), (e)	M Villar
47-1/2-2/1-1/1	Summary Calculation of QF Rate	1	Y		(d)	M Villar
47-1/2-3	Qualifying Facility Capacity Factor Report	2	Y		(d)	M Villar
47-1/2-4	System Net Generation	1	Y		(d)	M Villar
47-1/2-4/1	System Net Generation Aug. 97	1	Y		(d)	M Villar
47-1/2-5	CEB Capacity Payment	1	Y		(d)	M Villar
47-1/3	Billing Statement	2	Y		(d)	M Villar
47-1/3-2	QF Billing Statement Aug. 97	1	Y		(d)	M Villar
47-1/3-2/1	Daily Energy Payment Summary	1	Y		(d)	M Villar

**Fuel Cost Recovery Clause**  
**Audit Control No. 98-022-4-1**

<b>WK PAPER NO.</b>	<b>DESCRIPTION</b>	<b>NO. OF PAGES</b>	<b>CONF. Y/N</b>	<b>LINE NO./ COL. NG.</b>	<b>FLORIDA STATUTE 366.093(3) Subsection:</b>	<b>AFFIANT</b>
47-1/3-2/1-1	QF Energy Payment Calculation	31	Y		(d)	M Villar
47-1/3-2/1-1/1	Summary of QF Capacity Payment Rate and ICL	1	Y		(d)	M Villar
47-1/3-2/2	QF Capacity Factor Report	1	Y		(d)	M Villar
47-1/3-3	Cogen Calculation of Unit Energy Cost	1	Y		(d)	M Villar
47-1/3-3/1	Calculation of Unit Energy Cost	1	Y		(d)	M Villar
47-1/3-3/2	Coal Deliveries	1	N	--	--	--
47-1/3-3/2-1	Monthly Report of Cost and Tonnage for Coal	3	N	--	--	--
47-1/3-3/3	SJRPP Coal Deliveries	1	N	--	--	--
47-1/3-3/3-1	Monthly Report of Cost and Tonnage for Coal	3	N	--	--	--
47-1/3-3/4	CSX Contract Rate Adjustment	1	N	--	--	--
47-1/3-3/5	CSX Transportation Contract Escalation	1	N	--	--	--



**Fuel Cost Recovery Clause  
Audit Control No. 98-022-4-1**

<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>AFFILIANT</b>
47-1/3-4	Capacity Payment Calculation	1	Y		(d), (c)	M Villar
47-1/3-4/1	O&M Credit	2	Y		(d)	M Villar
47-1/3-4/1-1	Capacity Payment Contract Excerpt	2	Y		(d)	M Villar
47-2	Contract Indiantown	178	N	--	--	--
47-3	Contract Cedar Bay	146	N	--	--	--
48-1	Economy Schedule C Sale	2	Y		(d)	M Villar
48-2	Economy OS Detail	1	Y		(d)	M Villar
48-2/1	Opportunity Purchase	1	Y		(d)	M Villar
49-2/2	Schedule C Interchange Service	1	Y		(d)	M Villar

**Exhibit D**

**AFFIDAVIT OF  
SCOTT CRAIG**

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 Fuel )  
Cost Recovery Clause Audit; ) FILED: July 6, 1998  
Audit Control No. 98-022-4-1 )

STATE OF FLORIDA )  
 ) AFFIDAVIT OF SCOTT CRAIG  
COUNTY OF PALM BEACH )

**BEFORE ME**, the undersigned authority, personally appeared Scott Craig who, being first duly sworn, deposes and says:

1. My name is Scott Craig. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Corporate Finance. 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: (i) information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms; and/or (ii) information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and/or, if other than FPL, the provider of the information. 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.

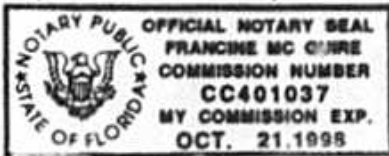
4. Affiant says nothing further.

  
\_\_\_\_\_  
Scott Craig

**SWORN TO AND SUBSCRIBED** before me this 1 day of July, 1998, by Scott Craig, 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:



**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 Fuel	)	
Cost Recovery Clause Audit;	)	FILED: July 6, 1998
Audit Control No. 98-022-4-1	)	

STATE OF FLORIDA	)	
	)	<b>AFFIDAVIT OF RICK DEL CUETO</b>
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 that I have reviewed and which are asserted by FPL to be 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 24<sup>th</sup> day of June, 1998, by Rick Del Cueto, 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:



Maura Hernandez  
MY COMMISSION & COSEGUROS EXPIRES  
May 25, 2000  
BOBBO THRU TRY FAN INSURANCE, INC.

**Exhibit D**

**AFFIDAVIT OF  
JOAQUIN E. LEON**



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 Fuel )  
Cost Recovery Clause Audit; ) FILED: July 6, 1998  
Audit Control No. 98-022-4-1 )

STATE OF FLORIDA )  
 ) AFFIDAVIT OF JOAQUIN E. LEON  
COUNTY OF MIAMI-DADE )

**BEFORE ME**, the undersigned authority, personally appeared Joaquin E. Leon who, being first duly sworn, deposes and says:

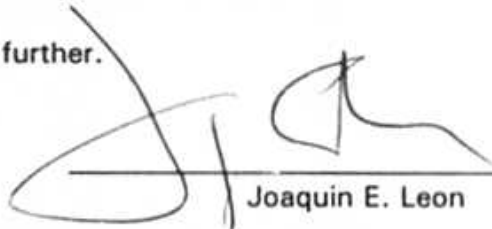
1. My name is Joaquin E. Leon. I am currently employed by Florida Power & Light Company ("FPL") as Senior Attorney. I have personal knowledge of the matters stated in this affidavit.

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 be proprietary confidential business information, as noted on Exhibit C, contain or constitute: (i) information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms; and/or (ii) information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and/or, if other than FPL, the provider of the information; and/or (iii) attorney-client privileged information protected from

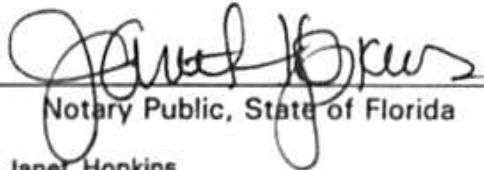
disclosure, see section 90.502(2), Florida Statutes (1997). FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for an indefinite period. 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.

  
\_\_\_\_\_  
Joaquin E. Leon

SWORN TO AND SUBSCRIBED before me this 2<sup>nd</sup> day of July, 1996, by Joaquin E. Leon, 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:



Janet Hopkins  
Commission # CC 743563  
Expires June 27, 2002  
BONDED THRU  
ATLANTIC BONDING CO., INC.

**Exhibit D**

**AFFIDAVIT OF  
ROBERT LIPPMAN**

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 Fuel )  
Cost Recovery Clause Audit; ) FILED: July 6, 1998  
Audit Control No. 98-022-4-1 )

STATE OF FLORIDA )  
 ) AFFIDAVIT OF ROBERT LIPPMAN  
COUNTY OF PALM BEACH )

**BEFORE ME**, the undersigned authority, personally appeared Robert Lippman who, being first duly sworn, deposes and says:

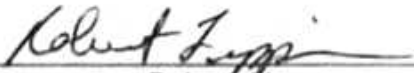
1. My name is Robert Lippman. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Fuel Supply & Operations. I have personal knowledge of the matters stated in this affidavit.

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 be proprietary confidential business information, as noted on Exhibit C, contain or constitute: (i) information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms; and/or (ii) information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and/or, if other than FPL, the provider of the information. FPL has maintained the confidentiality of these documents and materials.

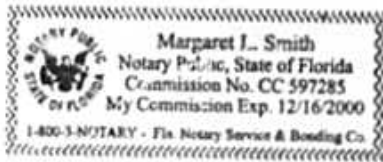
3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than

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.

  
Robert Lippman

**SWORN TO AND SUBSCRIBED** before me this 1 day of July, 1998, by Robert Lippman, 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: 12/16/2000

**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 Fuel )  
Cost Recovery Clause Audit; ) FILED: July 6, 1998  
Audit Control No. 98-022-4-1 )

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

**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 be 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 21<sup>st</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  
 MY COMMISSION # CC 894961  
EXPIRES: January 25, 2002  
Bonded Thru Notary Public Underwriters

My Commission Expires:



**Exhibit D**

**AFFIDAVIT OF  
MARIO VILLAR**

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 Fuel	)	
Cost Recovery Clause Audit;	)	FILED: July 6, 1998
Audit Control No. 98-022-4-1	)	

STATE OF FLORIDA	)	
	)	<b>AFFIDAVIT OF MARIO VILLAR</b>
COUNTY OF DADE	)	

**BEFORE ME** the undersigned authority, personally appeared Mario Villar who, being first duly sworn, deposes and says:

1. My name is Mario Villar. I am currently employed by Florida Power & Light Company ("FPL") as Manager, Resource Planning. 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 be proprietary confidential business information, as noted on Exhibit C, contain or constitute: (i) information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms; and/or (ii) information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and/or, if other than FPL, the provider of the information. FPL has maintained the confidentiality of these documents and materials.

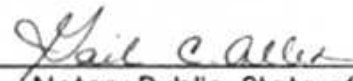
3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months and should be returned to FPL as soon as the information

is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

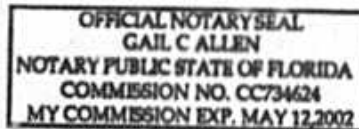
4. Affiant says nothing further.

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

**SWORN TO AND SUBSCRIBED** before me this 1<sup>st</sup> day of July, 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:



**Exhibit D**

**AFFIDAVIT OF  
CLAUDE VILLARD**

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 Fuel )  
Cost Recovery Clause Audit; ) FILED: July 6, 1998  
Audit Control No. 98-022-4-1 )

STATE OF FLORIDA )  
 ) AFFIDAVIT OF CLAUDE VILLARD  
COUNTY OF PALM BEACH )

**BEFORE ME**, the undersigned authority, personally appeared Claude Villard who, being first duly sworn, deposes and says:

1. My name is Claude Villard. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Nuclear Fuel. 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: (i) trade secrets; (ii) information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms; and/or (iii) information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and/or, if other than FPL, the provider of the information. 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.



\_\_\_\_\_  
Claude Villard

**SWORN TO AND SUBSCRIBED** before me this 1st day of July, 1998, by Claude Villard, 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:

