



Writer's Direct Dial:
(561) 691-7101

R. Wade Litchfield
Senior Attorney
Florida Authorized House Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 691-7103 (Facsimile)

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RECORDS AND
REPORTING

August 2, 1999

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 Materials Provided
In the Capacity Clause Recovery Audit No. 99-025-4-1
Docket No. 990001-EI**

Dear Ms. Bayò:

I enclose and hand you herewith for filing in the above-referenced matter, the original and two (2) copies of Florida Power & Light Company's ("FPL") Request for Confidential Classification in connection with Audit No. 99-025-4-1. The original includes Exhibits A, B, C and D. The two copies include only Exhibits B, C, and D.

Exhibit A contains the confidential information that is the subject of FPL's Request for Confidential Classification. Exhibit A is submitted for filing in a separate, sealed folder or carton marked "ATTACHMENT A - CONFIDENTIAL." Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been blocked out. Exhibit C contains FPL's justification for its request for confidential classification. Exhibit D contains affidavits in support of FPL's Request for Confidential Classification. Also included is a computer diskette containing the electronic version of FPL's Request for Confidential Classification and Exhibit C, in WordPerfect version 6/7/8.

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

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FPSC BUREAU OF RECORDS

X-ref 08553-99
DOCUMENT NUMBER-DATE

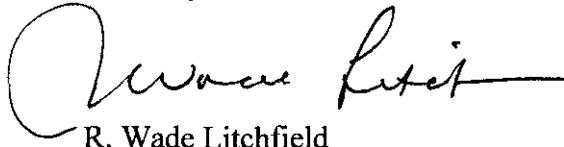
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Ms. Blanca S. Bayò
Director of Records and Reporting
Florida Public Service Commission
August 2, 1999
Page 2

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

Thanking you for your attention to this matter, I remain,

Sincerely,

A handwritten signature in black ink, appearing to read "R. Wade Litchfield". The signature is written in a cursive style with a large initial "R" and a long horizontal stroke at the end.

R. Wade Litchfield

RWL/jsb
Enclosures

2. During the Audit, Staff requested access to various FPL reports and other documents. By letter dated July 12, 1999, Staff indicated its intent to retain certain workpapers for which confidential treatment previously had been requested. Pursuant to Rule 25-22.006(3)(a), FPL was given twenty-one days from the date of the letter, or until August 2, 1999, 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 Rick Del Cueto and Osvaldo J. Lom.

4. FPL seeks confidential protection for the information highlighted in Exhibit A. FPL submits that the highlighted information is proprietary confidential business information within the meaning of section 366.093(3). Pursuant to section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

5. The information for which FPL seeks confidential classification consists of contractual data such as pricing and other terms, payment records and contractor rates. Disclosure of this information would impair the efforts of FPL to contract for services on favorable terms and/or would impair the competitive interests of the contractors.

6. FPL submits that the information highlighted in Exhibit A, and referenced in Exhibit C is proprietary confidential business information within the meaning of section 366.093(3). FPL submits that the information that is the subject of this Request for Confidential Classification should not be declassified for at least eighteen (18) months.

7. 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 established by the Commission 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,

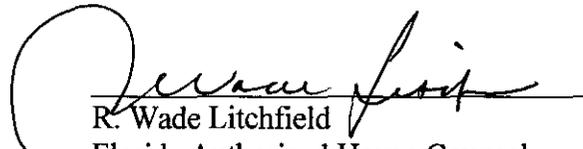

R. Wade Litchfield
Florida Authorized House Counsel
Attorney for
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Juno Beach, Florida 33408-0420
(561) 691-7101

Exhibit A

CONFIDENTIAL DOCUMENTS

(SUBMITTED SEPARATELY)

Exhibit B

REDACTED DOCUMENTS

Confidential

FPL
ADJUSTMENT
4/98 - 12/98

11/11/99
4/11/99



Southern Company Services, Inc.
270 Peachtree Street NW
Atlanta, Georgia 30303-1205



SCHERER UNIT 4 TRANSMISSION SERVICE AGREEMENT
INVOICE MONTH: MARCH 1999

FLORIDA POWER & LIGHT COMPANY
MIAMI, FLORIDA

Southern Company Services, Inc., acting solely as agent for Georgia Power Company, and in accordance with rate schedules on file with the Federal Energy Regulatory Commission, submits this invoice for ELECTRIC TRANSMISSION SERVICE to be delivered during MARCH 1999 as follows:

SEND REMITTANCE TO: Southern Company Services, Inc.
Attention: Treasury Department

INVOICE NO. S4-0399FPL

WE CHARGE YOUR ACCOUNT WITH:

	Monthly Transmission (\$/KW-MO) A	Monthly Capacity (KW) B	Monthly Charges (\$/MO) C
BUDGET CHARGES FOR MARCH 1999:			
Transmission Charge	[REDACTED]	[REDACTED]	[REDACTED]
Interface Charge	[REDACTED]	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]	[REDACTED]

ADJUSTMENTS FOR MARCH 1999:

Interest Charges	[REDACTED]
Previous Months Adjustment	[REDACTED]
Transmission True-up	[REDACTED]
Other Charges	[REDACTED]
TOTAL CAPACITY CHARGES DUE SOUTHERN FOR MARCH 1999:	[REDACTED]

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Exhibit C

Justification Table

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: Capacity Cost Recovery Clause
DATE: August 2, 1999
AUDIT CONTROL NO: 99-025-4-1

WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE	AFFIANT
					366.093(3) Subsection:	
9	Unit Power Sales Capacity Audit 1995-1997	9	N	--	--	--
9-1	Summary Status of Significant Audit Issues	2	N	--	--	--
9-1/1	Summary of Previous Month Adjustments 4/99 Invoice	2	N	--	--	--
9-1/1-1	Southern Company 4/99 Invoice	1	Y	Col. A, B, and C	(d), (e)	O. Lom
9-1/2	Summary of Previous Month Adjustments 12/98 Invoice	2	N	--	--	--
9-1/2-1	Southern Company 12/98	1	Y	Col. A, B, and C	(d), (e)	O. Lom
9-1/3	Summary of Previous Month Adjustments 9/98 Invoice	3	N	--	--	--
9-1/3-1	Southern Company 9/98 Invoice	1	Y	Col. A, B, and C	(d), (e)	O. Lom
	Summary of			--	--	--

WKPAPER NO.	DESCRIPTION	NO. OF PAGES	CONF. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection:	AFFIANT
9-1/4	Previous Month Adjustments 1/99	2	N			
9-1/4-1	Southern Company 1/99 Invoice	1	Y	Col. A, B, C	(d), (e)	O. Lom
9-1/5	Summary of Previous Month Adjustments 3/99	2	N	--	--	--
9-1/5-1	Southern Company 3/99 Invoice	1	Y	Col. A, B, C	(d), (e)	O. Lom
9-1/6	Invoice Summary of Previous Month Adjustments 5/99	2	N	--	--	--
9-1/6-1	Southern Company 3/99 Invoice	1	Y	Col. A, B, C	(d), (e)	O. Lom
9-2	Audit Request	1	N	--	--	--

Exhibit D

AFFIDAVITS

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchased Power) DOCKET NO. 990001-EI
Cost Recovery Clause and Generating)
Performance Incentive Factor) FILED: August 2, 1999

STATE OF FLORIDA)
)
COUNTY OF DADE) **AFFIDAVIT OF OSVALDO J. LOM**

BEFORE ME, the undersigned authority, personally Osvaldo J. Lom who, being first duly sworn, deposes and says:

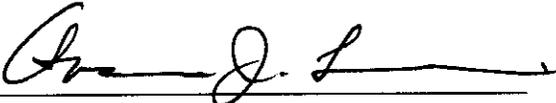
1. My name is Osvaldo J. Lom. I am currently employed by Florida Power & Light Company ("FPL") as Supervisor, purchase Power Administration, Wholesale Services. I have personal knowledge of the matters stated in this affidavit.

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. To the best of my knowledge, 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.

Affidavit of Osvaldo J. Lom
Request for Confidential Classification
Docket No. 990001-EI/Capacity Clause Audit No. 99-025-4-1
Page 2 of 2



Osvaldo J. Lom

SWORN TO AND SUBSCRIBED before me this 29 day of July, 1999, by Osvaldo J. Lom, 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:



Bertila Estopinales
MY COMMISSION # CC802392 EXPIRES
January 14, 2003
BONDED THROUGH FARM INSURANCE, INC.