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December 7, 1999

RECORDED AND REPORTING
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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

~~991855-EI~~

980190-EZ

Re: Florida Power & Light Company's Request for Confidential Classification of Materials Obtained During the Cost Allocation Between FPL and FPL Services Audit, Audit Control No. 97-223-4-1

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") First Request for Extension of Confidential Classification in connection with Audit No. 97-223-4-1 and FPSC Order No. PSC-98-0931-CFO-EI. The original includes Exhibits A1, B1, C and D. The two copies include only Exhibits B1, C and D. Exhibits A and B from the previous filings subject to Order No. PSC-98-0931-CFO-EI are incorporated herein by reference.

Prior Exhibits A, as amended by Exhibit A1, contain the confidential information that is the subject of FPL's First Request for Extension of Confidential Classification. Exhibit A1 is submitted for filing in a separate, sealed folder or carton marked "ATTACHMENT A - CONFIDENTIAL." Exhibit B1, amending prior Exhibits B, is an edited version of Exhibit A, in which the information FPL asserts is confidential on the amended pages 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 First Request for Extension of Confidential Classification. Also included is a computer diskette containing the electronic version of FPL's First Request for Extension of 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 Exhibits A, as amended by Exhibit

CONFIDENTIAL
DOCUMENT NUMBER-DATE
14951 DEC-7 99
FPL DIVISION OF RECORDS AND REPORTING

RECEIVED & FILED

mur

FPSC-BUREAU OF RECORDS

Request/Justification/Redacted
DOCUMENT NUMBER-DATE
14950 DEC-7 99
FPL DIVISION OF RECORDS AND REPORTING

Ms. Blanca S. Bayò
Director of Records and Reporting
Florida Public Service Commission
December 7, 1999
Page 2

A1, pending disposition of FPL's First Request for Extension of Confidential Classification.

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 fluid and cursive, with a prominent initial "R" and a long, sweeping underline.

R. Wade Litchfield

RWL/jsb
Enclosures

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

980190-EL

In the Matter of Florida Power & Light)
Company's Request for Confidential)
Classification in the Cost Allocation)
Between FPL and FPL Services Audit)

DOCKET NO: ~~991855-EL~~

Date Filed: December 7, 1999

**FIRST REQUEST FOR EXTENSION OF
CONFIDENTIAL CLASSIFICATION OF MATERIALS
PROVIDED IN THE COST ALLOCATION BETWEEN FPL
AND FPL SERVICES AUDIT, AUDIT CONTROL NO. 97-223-4-1**

NOW, BEFORE THIS COMMISSION, through undersigned counsel, comes Florida Power & Light Company ("FPL") and, pursuant to rule 25-22.006 of the Florida Administrative Code and section 366.093 of the Florida Statutes, hereby submits its First Request for Extension of Confidential Classification of certain materials provided to the Florida Public Service Commission ("FPSC" or "Commission") staff ("Staff") in connection with the cost allocation between FPL and FPL Services audit, Audit Control No. 97-223-4-1 (hereinafter 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
Florida Power & Light Company
Vice President
215 South Monroe Street
Suite 810
Tallahassee, Florida 32301-1859
(850) 224-7595

R. Wade Litchfield
Florida Power & Light Company
Senior Attorney
700 Universe Boulevard
Juno Beach, Florida 33408-0420
(561) 691-7101
(561) 691-7103 Facsimile

2. On February 6, 1998, FPL filed with the Commission its Request for Confidential Classification of certain materials obtained during the Audit. FPL's initial filing consists of the Request for Confidential Classification and Exhibits A through F. On March 30, 1998, FPL filed with the Commission its Request for Confidential Classification of portions of the Staff's Audit report ("Audit Report"). FPL's March 30, 1998 filing consists of Exhibits A through F.

3. By Order No. PSC-98-0931-CFO-EI, dated July 8, 1998, the Commission granted in part FPL's two requests.

4. The period of confidential treatment granted by the Commission will soon expire. Much of the information that was the subject of FPL's February 6, 1998 Request and its March 30, 1998 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093. Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

5. Except as expressly noted below, FPL incorporates herein by reference Exhibits A and B from its February 6, 1998 filing and Exhibits A and B from its March 30, 1998 filing.

6. Included herewith and made a part hereof are Exhibits A1, B1, C and D. Exhibit C identifies the information that FPL contends is entitled to an extension of confidential classification. Exhibit C also reflects the information for which confidential classification is no longer requested. Such information is indicated in boldface and italicized type on Exhibit C to this Request. Accordingly, these referenced work papers should be removed from Exhibits A and B as filed February 6, 1998, and from Exhibits A and B of the March 30, 1998 filing.

7. Amended Exhibit C also contains revisions indicating that with respect to certain work papers, or portions thereof, FPL has narrowed its request for confidential classification. Specifically,

FPL has narrowed its request for confidential classification with respect to work papers no. 44-3/4-2, 44-3/5-1/12-4/3, 45-10/2-3, and 45/10/2-23.

8. Exhibits A1 and B1 contain the work papers referenced above in paragraph 7 for which FPL has narrowed its request for confidential classification. In the work papers comprising Exhibit A1, the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit A1 is submitted separately in a sealed folder marked "Confidential." The highlighted work papers contained in Exhibit A1 replace the work papers of the same identification number included in Exhibit A in FPL's February 6, 1998 filing. FPL requests that the replaced pages of the original Exhibit A in its February 6, 1998 filing, at the Commission's option, be destroyed or returned to FPL.

9. In Exhibit B1, the information for which FPL seeks confidential treatment on the amended work papers has been blocked out. The work papers contained in Exhibit B1 replace the work papers of the same identification number or reference included in Exhibit B in FPL's February 6, 1998 filing.

10. Exhibit D includes the affidavits of Rick Del Cueto, Mark Mitchell, Dennis Brandt and John Haney.

11. Pursuant to section 366.093, FPL seeks confidential classification of the information highlighted in Exhibit A as filed in 1998, as hereby amended.

12. 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.

13. 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 John Haney, Mark Mitchell, Dennis Brandt and Rick Del Cueto. The Justification Table identifies the affiant attesting to the basis for FPL's assertion of confidentiality with regard to each document or portion thereof.

14. Upon a finding by the Commission that the material in Exhibit A of the February 6, 1998 filing, as amended by Exhibit A1, and Exhibit A of the March 30, 1998 filing, for which FPL seeks confidential treatment continues to be 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 the additional periods of confidentiality 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 or incorporated herein by reference, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

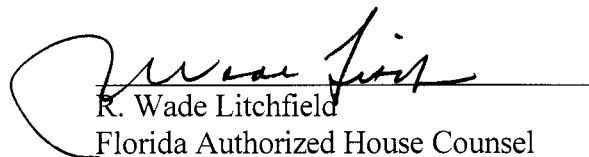

R. Wade Litchfield
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Attorney for
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700 Universe Boulevard
Juno Beach, Florida 33408-0420
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Exhibit A1

CONFIDENTIAL DOCUMENTS

(SUBMITTED SEPARATELY)

Exhibit B1

REDACTED DOCUMENTS

Author: Robert Ohsgard at USFPL102

Date: 8/15/96 11:44 AM

Priority: Normal

TO: [REDACTED] at USFPL103

TO: [REDACTED] at USFPL123

TO: [REDACTED] at USFPL103

TO: [REDACTED] at USFPL202

CC: Don Moranz

CC: John Dewar at USFPL202

CC: Winnie Lohmann

CC: Ariel Perez at USFPL620

CC: Carol Dieringer

Subject: Facility Rates for FES

----- Message Contents -----

Gentleman,

Based on the information received to date, below are the buildings occupied by FPL Energy Services, the related square footages and billing rates. This information has been collected from yourselves, John Dewars and Don Moranz. The invoice you receive this month will have billings for these facilities for the month of July.

5 ① Margate Office
3544 Sq Ft @ \$12.00/Sq Ft Annual

6 Area Office of Broward (AOB or Plantation)
2048 Sq Ft @ \$17.00/Sq Ft Annual

7 ② Brevard Office (Rockledge)
1000 Sq Ft @ \$12.00/Sq Ft Annual

Based on the above the total monthly billing will be \$7,445.33.
Thanks for your help, and please call me with any comments or questions.

Robert

44-3
4-2
P. 10j

(A)

EMP #	COMPANY	NP CODE	PAY LOCN	BLDG	ER/WD	CHG LOCN
06132 GC	XX	6	8970	XX	99/4628	897
02417JA	XX	6	8970	XX	99/4628	897
109985TH	XX	6	0093	XX	91/4642	093
13629 DG	XX	6	0093	XX	91/4642	093
17820PT	XX	6	8970	XX	99/0261	897
24902MG	XX	6	0093	XX	91/4642	093
292502N	XX	6	0093	XX	91/4642	093
42464 6H	XX	6	0093	XX	91/4642	093
58603 FC	XX	6	0093	XX	91/4642	093
94013WA	XX	6	0093	XX	91/4642	093

TOTAL COMPANY 08

LEAD SYSTEMS
PERIOD ENDING DATE: 11/03/96

Salary

REGULAR EARNINGS

[REDACTED]

OVERTIME EARNINGS

[REDACTED]

OTHER EARNINGS

[REDACTED]

TOTAL

[REDACTED]

118
1122

(F)

[REDACTED]

44-3
5-1
12-4
1

44-3
5-1
12-4
3

1710151

LABOR DISTRIBUTION REPORT
 PERIOD ENDING DATE: 11/22/96

(A) EMP #	COMPANY	RP CODE	PAY LOCN	BLDG	ER/WO	CHG LOCN	(B) REGULAR EARNINGS	(C) OVERTIME EARNINGS	(D) OTHER EARNINGS	(E) TOTAL
00132	XX	6	8970	XX	91/8842	001	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
					99/4628	897				
03417	JB XX	6	8970	XX	99/4628	897				
10995	JH XX	6	0093	XX	91/4642	093				
13629	DC XX	6	0093	XX	91/4642	093				
17520	RS XX	6	8970	XX	99/0261	897				
24902	MG XX	6	0093	XX	91/4642	093				
29250	BN XX	6	0093	XX	91/4642	093				
42464	BT XX	6	0093	XX	91/4642	093				
58603	EL XX	6	0093	XX	91/4642	093				
94013	WA XX	6	0093	XX	91/4642	093				

*TOTAL COMPANY OS

Salary.

8383
 44-3
 5-1
 12-4
 3

INTERVIEW NAME

Rebecca Chapman

DATE INTV BY

1/7/98
[Redacted]

1. Job Title

Dec 94 - June 1997

CI MKT Sales Specialist

2. Business Unit

MKT + Sales

3. Please describe your responsibilities.

Support to CI as 4 mgrs. - Support Log CI Customer on 500
Corporal level support.
involve meet w/ customer
make work on projects - particularly need billing problems - developed

4. Please describe a day of typical activities.

meetings w/ customer
attend staff meetings CI
work on projects - meetings
Constant - billing -
meetings + processes.
promote every project
late night. - 24 hr program

5. Who are the people you interact with on a daily or weekly basis? Give us names of company people and/or customers.

interacts w/ CI Customer Service Group in some form
FPL Service

6. Are you a fixed allocation or a variable allocation? If variable, ask how they keep their time? If fixed, ask them if they know their fixed percents. Compare with the information given to us by FPL. (We can tell what kind of allocation from the information given to us by FPL before the interviews).

mostly ECR.

FPL Service -

meets w/ particular customer @ request
of as 4 mgrs. - never had contact
w/ cust.

would call service from some kind
of request from as 4 mgrs. - customer may bid month of the group's request
Once built rolling called herself. 2 distinct cooling - projects

they would not to as 4 mgrs
- as 4 mgrs. would call her (as 4 mgrs could be)

45-10
2-23
① [Redacted]
② [Redacted]
③ [Redacted]
④ [Redacted]

7. If receive requests and give out info for load data, ask what kind of information do they supply?

No

8. Do people ask for peak time of use data? Is that part of standard information given? Do people ask for pulse meter data? If that part of standard information given?

No

9. Do you deal with customers who are interested in conservation programs? If so, do you ever recommend a vendor/participant for an energy conservation program after they requested information about a program, load data or after they have an audit?

yes / / No

10. If you recommend, who do you recommend? How do you decide to recommend?

Did you ever recommend FPL Services? To whom?
No

10A. Have you ever been instructed to recommend FPI Services to customers? Who instructed you? Why?

→ No

11. Do you or did you ever interact with any FPL Services employees? Who?

Meet w/ Customer at request of acct mgr. - would call Services based on a request of acct mgr.

① district cooling
② [redacted]
③ [redacted]
④ [redacted]

45-10
2-23

789

Exhibit C

Justification Table

EXHIBIT C

COMPANY: FPL
 TITLE: LIST OF CONFIDENTIAL WORKPAPERS
 AUDIT: COST ALLOCATION BETWEEN FPL/FPL SERVICES AUDIT
 DATE: DECEMBER 7, 1999

Book No.	WKPAPER NO.	DESCRIPTION	NUMBER OF PAGES	CONF Y/N	LINE NO./ COLUMN NO.	FLORIDA STATUTE 367.156(3) Section:	AFFIDAVIT
N/A	1	REPORT	19	Y	pg. 2, line 1; pg 3 col. A, lines 1-40; pg. 5, lines 1-2; pg. 11, col.A, lines 1-8, lines 9-10; pgs. 14-15, all lines; pg. 19, line 1	(e)	JH/DB
	5-1/2-3	INSTALLER/INCENTIVE AMOUNT	2	Y	pg. 1, col. A; pg. 2, col. A	(e)	DB
	5-6	INTERVIEW JOHNSON/JOHN HANEY	3	N			
	9	LIST OF AUDITS	7	Y	All	(b)	RD
	9-1	INTERNAL AUDITS WP-NET ENERGY LOAD	1	Y	All	(b)	RD
	9-2	INTERNAL AUDIT NOTES-FPL SVS	1	Y	All	(b)	RD
	9-2/1	INTERNAL AUDIT WP-LETTER	2	Y	All	(b)	RD
	9-2/2	INTERNAL AUDIT WP-FPL SVS SALES PRO	8	Y	All	(b)	RD
	9-2/3	INTERNAL AUDIT WP-ACCOUNTING	6	Y	All	(b)	RD
	9-3	INTERNAL AUDIT NOTES-1997 FPL SVS A	4	Y	All	(b)	RD
	10-24	AUDIT SERVICE REQUEST NUMBER 24	1	Y	Line 2	(e)	JH
	10-29	AUDIT SERVICE REQUEST NUMBER 29	1	Y	Lines 1-2	(e)	JH
	10-32	AUDIT SERVICE REQUEST NUMBER 32	1	Y	line 2	(e)	JH
	10-33	AUDIT SERVICE REQUEST NUMBER 33	1	Y	line 1	(e)	JH
	10-34	AUDIT SERVICE REQUEST NUMBER 34	3	Y	pg. 1, line 1, 3; pg 2 col A-F; pg. 3 col A	(e)	JH
	10-35	AUDIT SERVICE REQUEST NUMBER 35	1	N			
	10-36	AUDIT SERVICE REQUEST NUMBER 36	2	Y	pgs. 1-2, lines 1-6	(e)	JH
	10-37	AUDIT SERVICE REQUEST NUMBER 37	2	Y	pg. 2, line 1	(e)	JH
	10-38	AUDIT SERVICE REQUEST NUMBER 38	1	Y	pg. 1, line 3	(e)	JH
	10-39	AUDIT SERVICE REQUEST NUMBER 39	1	Y	pg. 1, line, 4, 6-7	(e)	JH
	10-42	AUDIT SERVICE REQUEST NUMBER 42	2	N			
	10-43	AUDIT SERVICE REQUEST NUMBER 43	4	N			
	10-44	AUDIT SERVICE REQUEST NUMBER 44	1	N			
	10-49	AUDIT SERVICE REQUEST NUMBER 49	1	N			
	42-1/1	CUSTOMER LIST	1	Y	pg. 1 col. A- B	(e)	JH
	42-1/2	UTILITY DSM CHARGES	1	Y	lines 1-2	(e)	JH
	42-1/3	RESPONSE TO REQUEST 37	1	Y	pg. 1, lines 1- 3	(e)	JH
	42-1/3-1	RESPONSE TO REQUEST 37	1	N			

42-1/3-1/1	RESPONSE TO REQUEST 37	14	Y	pgs. 2-14, all	(e)	JH
42-1/4	REQUEST 36	1	Y	lines 1-6	(e)	JH
42-1/4-1	BILLING HISTORY	3	Y	pgs. 1-3, lines 1-4	(g)	DB
42-1/4-2	BILLING HISTORY	3	Y	pgs. 1-3, lines 1-4	(g)	DB
42-1/4-3	BILLING HISTORY	3	Y	pgs. 1-3 lines 1-4	(g)	DB
42-1/4-4	BILLING HISTORY	3	Y	pgs. 1-3 lines 1-4	(g)	DB
42-2	MEMO RE:PASS THROUGH BILLING	1	Y	lines 1-5	(g), (h)	DB /JH
42-2/1	BILLING EXAMPLE	2	Y	Pg. 1 lines 1- 10, pg. 2 lines 1-12	(g)	DB
42-3	BILLING EXAMPLE	3	Y	pgs. 1-3, lines 1-12	(g)	DB
42-4	BILLING EXAMPLE	1	Y	Lines 1-12	(g)	DB

N/A	42-5	BILLING EXAMPLE	3	Y	Pgs. 1-3, lines 1-11	(g)	DB
	42-6	BILLING EXAMPLE	3	Y	Pg. 1, lines 1-11; pg. 2, lines 1-3; pg. 3, lines 1-11	(g)	DB
	42-7	BILLING EXAMPLE	7	Y	pg.1, lines 1-8, pgs. 2-3, lines 1-9; pg. 4, lines 1-10, pgs. 5-6, lines 1-9; pg. 7, lines 1-7	(g)	DB
	42-8	BILLING EXAMPLE	6	Y	pgs. 1-3, lines 1-12; pgs. 4-6, lines 1-9	(g)	DB
	42-9	ANSWER TO REQUEST 36	11	Y	pg.1, lines 1-3, pgs. 2-10, lines 1-5, pg. 11, lines 1-7, col. A	(e)	JH
	44-2/1	BALANCE SHEET 12/96	1	Y	col. A	(e)	JH
	44-2/1-1	ANSWER TO REQUEST 24	1	N			
	44-2/1-1/1	DEPRECIATION SUMMARY 1996	4	Y	pg. 1, col. A, line 1; col. B-F, all lines, pg. 2, col A, lines 1-2; col. B-F; pg. 3, col. A, lines 1-5, col. B-F; pg. 4, col. A, lines 1-3, col. B-F	(h) (e) (e), (h) (e)	JH JH JH JH

44-2/1-1/2	DEPRECIATION SUMMARY 1997	5	Y	pg. 1, col. A, lines 1,3,5,7,9,11, 13, 14, 15, 17, 19, 20, 21; col. B-F, all lines, line 16; pg. 2, col. A, lines 2, 4, 6, 8, 10, 12, 14, 16, 18, 20, 21, 22, 24, 26, 28, 30, col. B-F, all lines; pg. 3, col. A, lines 1, 3, 5, 7, 8-13, 15, 17, 19, 21, 23, 25, 27-29, 31, col. B-F, all lines; pg. 4, col. A, lines 1-2, 6, 8, 10, 12, 14, 16, 18, 20, 23, 24, col. B-F line 25, all lines; pg. 5 col. A, lines 1-8, col. B-F, all lines	(e) (h) (e) (h) (e)	JH JH JH JH JH
44-2/2	BALANCE SHEET 12/95	1	Y	col. A	(e)	JH
44-3/1	INCOME STATEMENT 12/96	1	Y	col. A-C	(e)	JH
44-3/1-1/1	EXPENSE LISTING 12/96	1	Y	col. A-B	(e)	JH
44-3/1-1/2	INCOME STATEMENT 9/97	1	Y	col. A-B	(e)	JH
44-3/2	STATEMENT OF OPERATIONS	1	Y	col. A	(e)	JH
44-3/4	CASE HOLDING LEASE LETTER	1	Y	lines 1-6	(e)	JH
44-3/4-1	RENT EXPENSE	1	Y	col. A-C	(e)	JH
44-3/4-2	RENT MEMORANDUMS	2	Y	pg. 1, lines 1-4; pg. 2, lines 1-4	(e)	JH
44-3/5-1	INCOME STATEMENT 12/96	1	Y	Col. A, B Line 1	(e) (h)	JH JH
44-3/5-1/1	OFFICE EQUIPMENT	1	Y	Col. A	(e)	JH
44-3/5-1/2	TELECOMMUNICATIONS	2	Y	Pg. 1, col. A, line 44; Col. B, all lines; pg. 2, col. A	(h) (e)	JH JH
44-3/5-1/3	RENT ACCOUNT	1	Y	col. A	(e)	JH
44-3/5-1/4	MARKETING ACCOUNT	1	Y	col. A	(e)	JH
44-3/5-1/5	INSURANCE	1	Y	col. A, E	(e)	JH

44-3/5-1/6	ACCOUNTING	1	Y	col. A, lines 1-3, 7, 10, 12-14, col. B, all lines, col. C, all lines	(e)	JH
44-3/5-1/7	LEGAL	1	Y	col. A	(e)	JH
44-3/5-1/8	TECHNICAL SERVICES	1	Y	col. A, line 1; col. B, all	(e)	JH
44-3/5-1/9	OTHER OPERATING EXPENSES	5	Y	pg. 1, col. A, lines 1-3,14, col. B, lines 8-9, 14, 16-18, col. C, all lines; pg. 2, col. a, line 37, col. B, all lines; pg. 3, col. B, all lines; pg. 4, col. A, lines 16, 18-19, 51, col. B, lines 29, 57, col. C, all lines; pg. 5, col. A, lines 4, 5, 18, col. B-C, all lines	(e)	JH
44-3/5-1/10	WARRANTY EXPENSE	1	Y	Col. A, B	(e)	JH
44-3/5-1/12	LABOR ACCOUNT	2	Y	pg. 1, lines 1-2, col. A, lines 3-14, 20-23, col. B, all lines, col. C-F, all lines; pg. 2, lines 1-3, Col. A, lines 4-19, col. B-F, all lines	(e)	JH
44-3/5-1/12-1	PAYROLL ACCRUAL	1	Y	Col. A-E; line 1	(e)	JH
44-3/5-1/12-2	PAYROLL REVERSALS	2	Y	Pgs. 1, col. A-D; pg. 2, line 1, col. A-D	(e)	JH
44-3/5-1/12-3	FPL GROUP INVOICE	1	Y	Col. A-F	(e)	JH
44-3/5-1/12-4	FPL GROUP PAYMENT	2	Y	pg. 1, lines 1-3; pg. 2, line 1, col. A	(e)	JH
44-3/5-1/12-4/1	LABOR DIST. REPORT	1	Y	col. A-L	(e)	JH

N/A	44-3/5-1/12-4/1-1	FPIs SERVICES EMPLOYEE LIST	1	Y	col. A	(h)	JH
	44-3/5-1/12-4/2	PAYROLL SUMMARY REPORT	1	Y	Col. A-D	(e)	JH
	44-3/5-1/12-4/3	LABOR DIST. REPORT	3	Y	Pg. 1, col. B-F; pg 2, col. A-D; pg. 3, col. B-E	(e)	JH
	44-3/5-1/12-4/4	JOURNAL VOUCHER	2	Y	pg. 1, col. A-C; pg. 2, col. A-D	(e)	JH
	44-3/5-1/12-5	JOURNAL VOUCHER	3	Y	pgs. 1-3, col. A-B	(e)	JH
	44-3/5-1/12-5/4	BANK STATEMENT	3	Y	pgs. 1-3, all lines	(e)	JH
	44-3/5-1/12-6	ACCOUNT 6110	2	Y	Pg. 1, col. A-D, lines 1-3; pg. 2, col. A-B	(e)	JH
	44-3/5-1/12-6/1	ACCOUNT 6110	1	Y	Lines 1-10, col. A-D	(e)	JH
	44-3/5-1/12-6/2	ACCOUNT PAYABLE	1	Y	Lines 1-5, col. A	(e)	JH
	44-3/5-1/12-7	PAYROLL LOADING	1	Y	Col. A-K	(e)	JH
	44-4/1	CONS BALANCE SHEET-ENERGY SVS	1	Y	Col. A	(e)	JH
	44-4/1-1	DEPRECIATION SUMMARY	4	Y	Pg. 1, col. A, line 1, col. B-F, all lines; pg. 2, col. A-E; pg. 3, col. A, lines 6, 8, 10, 12, 14, 16, col. B-F, all lines; pg. 4, col A-J	(h) (e)	JH JH
	44-4/2	BALANCE SHEET 12/95	1	Y	col. A	(e)	JH
	44-5/1	CONS STATEMENT OF OPERTS 12/96	1	Y	col. A-B	(e)	JH
	44-5/1-1	EXPENSES 12/96	1	Y	col. A-C	(e)	JH
	44-5/1-2	EXPENSES 9/97	1	Y	col. A-D	(e)	JH
	44-5/2	STATEMENT OF OPERATIONS 12/95	1	Y	col. A	(e)	JH
	45-1	EMPLOYEE LIST/ORG. CHART	3	Y	pg. 1, col. A; pg. 3, all	(e), (h)	JH
	45-4	OVERLAP OF EMPLOYEES	5	N			
	45-5 P.6	FIXED DISTRIBUTION	1	N			
	45-6	FPL EMPLOYEES ATTD. MEETING W/SVS	3	Y	pg. 2, lines 1-4, 5, 6; pg. 3, lines 1-13	(h)	JH
	45-8	EMPLOYEES TO OBTAIN TIME ALLOC.	4	Y	pg.1, col. A and B, lines 1,21,24, 26, 28, 31 ,45, 47, 57, 65; pg. 4, col. A	(e)	JH

	45-8/2	EMPLOYEES TO OBTAIN TIME ALLOC.	3	Y	pg. 1, col. A and B, lines 1, 21, 24, 26, 28, 31, 47, 57; pg. 2, col. A and B, line 65	(e)	JH
	45-8/2-1	LIST OF PERSONNEL TO INTERVIEW	1	Y	col. A	(e)	JH
	45-8/2-1/1	ANSWER TO REQUEST 30	1	N			
	45-10/1	EMPLOYEES TO OBTAIN TIME ALLOC.	3	Y	pg. 1, col. A and B, lines 1, 21, 24, 26, 28, 31, 45, 47, 57; pg. 2, col. A and B, line 65	(e)	JH
	45-10/1-2	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-3	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-6	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
N/A	45-10/1-7	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-8	FIXED DISTRIBUTION	2	Y	pgs. 1 and 2, line 1	(f)	DB
	45-10/1-9	FIXED DISTRIBUTION	2	Y	pgs. 1 and 2, line 1	(f)	DB
	45-10/1-11	FIXED DISTRIBUTION	2	Y	pgs. 1 and 2, line 1	(f)	DB
	45-10/1-11/1	CORRESPONDENCE	3	Y	pg. 1, line 1; pg. 2, col. A, lines 1-3, col. B, lines 3 and 4	(e) (h)	JH
	45-10/1-13	FIXED DISTRIBUTION	2	Y	pgs. 1 and 2, line 1	(f)	DB
	45-10/1-14	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-15	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-16	FIXED DISTRIBUTION	2	Y	pgs. 1 and 2, line 1	(f)	DB
	45-10/1-17	FIXED DISTRIBUTION	2	Y	pgs. 1 and 2, line 1	(f)	DB
	45-10/1-18	FIXED DISTRIBUTION	2	Y	Pgs. 1 and 2, line 1	(f)	DB
	45-10/1-9	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-22	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-23	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-30	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-32	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-38	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-41	FIXED DISTRIBUTION	2	Y	Pgs. 1 and 2, line 1	(f)	DB
	45-10/1-42	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB

	45-10/1-43	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-44	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-48	FIXED DISTRIBUTION	2	Y	Pgs. 1 and 2, line 1	(f)	DB

N/A	45-10/1-51	FIXED DISTRIBUTION	3	Y	pgs. 1-3, line 1	(f)	DB
	45-10/1-53	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-55	FIXED DISTRIBUTION	3	Y	pgs. 1-3, line 1	(f)	DB
	45-10/1-59	FIXED DISTRIBUTION	2	Y	pgs. 1-2, line 1	(f)	DB
	45-10/1-61	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-63	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-64	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-68	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-69	FIXED DISTRIBUTION	2	Y	pgs. 1-2, line 1	(f)	DB
	45-10/1-70	FIXED DISTRIBUTION	2	Y	pgs. 1-2, line 1	(f)	DB
	45-10/1-71	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-72	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-73	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-74	FIXED DISTRIBUTION	3	Y	pgs. 1-3, line 1	(f)	DB
	45-10/1-76	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-77	FIXED DISTRIBUTION	3	Y	pgs. 1-3, line 1	(f)	DB
	45-10/1-78	FIXED DISTRIBUTION	2	Y	pgs. 1-2, line 1	(f)	DB
	45-10/1-79	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-80	FIXED DISTRIBUTION	2	Y	Pgs 1 and 2, line 1	(f)	DB
	45-10/1-81	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB

N/A	45-10/1-82	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-84	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-85	FIXED DISTRIBUTION	2	Y	pgs. 1-2, line 1	(f)	DB
	45-10/1-86	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-87	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-88	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-89	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-90	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-91	FIXED DISTRIBUTION	2	Y	pgs. 1-2, line 1	(f)	DB
	45-10/1-92	FIXED DISTRIBUTION	2	Y	pgs. 1-2, line 1	(f)	DB
	45-10/1-93	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-94	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-95	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/1-96	FIXED DISTRIBUTION	1	Y	line 1	(f)	DB
	45-10/2	LIST OF FPL EMPLOYEES TO INTERVIEW	5	N			
	45-10/2-1	SUMMARY OF EMPLOYEE INTERVIEWS	11	Y	pg. 2, lines 1-2; pg. 8, lines 1-2	(e), (h) (e)	DB/JH DB/JH

45-10/2-2	SUMMARY OF EMPLOYEE INTERVIEWS	30	Y	Pg.2, lines 1 and 2; pg. 3, col. A, lines 1, col. B, line 1, col. C, lines 1-7, col. D, lines1-5; pg. 4, col. A, line 1; pg. 6, col. A, lines 1-3, 5, 7; pg. 7, col. A, lines 1-5, col. B, lines 1-9, col. C, line 1, col. D, lines 1-4; pg. 9, col. D, lines 1-3; pg. 10, col. D, lines 1-4; pg. 11, col. A, lines 1-4, col. B, lines 1-9, col. D, line 1; pg. 12, col. A, lines 1-4, col. B, line 1; pg. 15, col. A, lines 1-5, col. B, lines 1-3, col. D, lines 1 and 2; pg. 17, col. A, lines 1 and 2; pg. 19, col. B, lines 1-4; pg. 21, line 1; pg. 24, line 1 and 2; pg. 26, lines 1 and 2; pg. 29, lines 1-6	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	DB/JH
45-10/2-2/1	STAFF COMMENTS ON FPL 1997 BUSINESS PLAN	1	N			
45-10/2-2/2	FPL 1997 BUSINESS PLAN FOR CI CUST SERVICE	2	Y	pgs. 1 and 2, all	(e)	DB
45--10/2-2/3	ALLOCATIONS FOR ONE EMPLOYEE	1	N			
45-10/2-3	INTERVIEW NOTES FOR CI TECH SPECIALIST	11	Y	2; pg. 5, lines 1-3; pg. 6 and 7, line 1; pg. 11, line 1	(e) (f) (e)	DB/JH DB DB/JH

	45-10/2-4	INTERVIEW NOTES FOR TECH SPECIALIST	12	Y	pg. 2, line 1; pg. 6 and 7, lines 1 and 2; pg. 9, line 1; pg. 10, line 5 and 6; pg. 11, lines 1-4; pg. 12, lines 1-4	(e) (f) (e)	JH DB JH
	45-10/2-5	INTERVIEW NOTES FOR FIELD SPECIALIST	13	Y	pg. 2, lines 1-3; pg. 3, lines 1-4; pg. 6, lines 1-3; pg. 7, lines 1-3; pg. 8, line 1; pg. 9, lines 1-14; pg. 10, lines 1-7; pg. 12 and 13, line 1	Names of employees of FPL Services: (h) All other information: (e) (f)	DB/JH DB

N/A	45-10/2-6	INTERVIEW NOTES FOR TERRITORIAL MANAGER	14	Y	pg. 1, lines 1-4; pg. 2, line 1; pg. 3, line 1; pg. 4, lines 1 and 2; pg. 6 and 7, line 1; pg. 8, lines 1-3; pg. 9, line 1; pg. 10, line 1; pg. 11, line 1, col. A & B; pgs. 12 and 13, all; pg. 14, lines 1-10	(e), (h) Names of employees of FPL Services: (h) All other information: (e) (f) (e), (h)	DB/JH DB DB/JH
	45-10/2-7	INTERVIEW NOTES FOR MAJ. ACCOUNTS MANAGER	15	Y	pg. 1, lines 1-6; pg. 3, lines 1-3, pg. 4, lines 1-5; pg. 6, lines 1-4; pg. 7, line 1; pg. 8, lines 1-3; pg. 10, col. A; pg. 11 and 12, line 1; pg. 13, line 1-25; pg. 14, lines 1-9; pg. 14, lines 10-13; pg. 15, lines 1-10	(e), (h) (f) (e) (h) (e)	JH DB JH JH JH
	45-10/2-8	INTERVIEW NOTES FOR NATIONAL ACCOUNTS MANAGER	6	Y	pg. 3, line 1; pg. 6, line 1	(e) (f)	JH DB
	45-10/2-9	INTERVIEW NOTES FOR SR. ACCOUNTS MANAGER	14	Y	pg. 2, lines 1 and 2; pgs. 3, 6, 7, line 1; pg. 9, line 1; pg. 10, line 1; pgs. 11, 12, lines 1 and 2; pg. 13, line 1 and 2, pg. 14, line 1-18	(e), (h) Names of employees of FPL Services: (h) All other information: (e) (f) (e), (h)	DB/JH DB DB/JH

45-10/2-10	INTERVIEW NOTES FOR MAJ. ACCOUNTS MGR I	20	Y	pg. 1, lines 1-10; pg. 2, line 1; pg. 4, line 1; pg. 5, lines 1-5; pgs. 8 and 9, line 1; pg. 16, lines 1-10; pg. 17, lines 1-7; pg. 18, col. A-E; pg. 19, lines 1 and 2, col. A, AA, B; pg. 20, lines 1-6	(e), (h) (f) Names of employees of FPL Services: (h) All other information: (e)	DB/JH DB DB/JH
45-10/2-11	INTERVIEW NOTES FOR ENGINEERING MGMT. CONSULTANT	4	Y	pgs. 1, line 1; pg. 2, line 1; pg. 3, lines 1-10; pg. 4, lines 1-8	(e) (f) (e)	DB/JH DB DB/JH
45-10/2-12	INTERVIEW NOTES FOR VP SALES & MKT	6	Y	Pg. 1, lines 1-3; pg. 2, lines 1-6; pg. 3, lines 1 and 2; pg. 6, line 1	(h) (e) (f)	JH DB/JH DB
45-10/2-13	INTERVIEW NOTES FOR MAJ. ACCOUNTS MGR.	10	Y	Pg. 2, lines 1 and 2; pg. 3, lines 1-5; pg. 6, lines 1-15, col. A and B, lines 1-7; pg. 7, lines 1-9; pg. 8-10, line 1	(e), (h) Names of employees of FPL Services: (h) All other information: (e) (f)	DB/JH DB
45-10/2-14	INTERVIEW NOTES FOR TREASURER	6	Y	Pg. 6, line 1	(f)	DB
45-10/2-15	INTERVIEW NOTES FOR PRODUCT DEVELOP MGR.	11	Y	Pg. 3, lines 1 and 2; pgs. 6 and 7, line 1; pgs. 8, line 1 and 2; pg. 10, lines 1 and 2	(e) (f) (h) (e)	DB/JH DB JH DB/JH

45-10/2-16	INTERVIEW NOTES FOR REGIONAL MANAGER	13	Y	Pg. 2, lines 1 and 2; pg. 3, lines 1-5; pg. 6, line 1; pg. 7, line 1-3; pg. 9, lines 1 and 2; pg. 10, line 1; pg. 11, col. A-G; pgs. 12-13, all	(e), (h) Names of employees of FPL Services: (h) All other information: (e) (f) (e) (h) (e)	DB/JH DB DB/JH JH
45-10/2-17	INTERVIEW NOTES FOR DIRECTOR OF GOV'T CUST. SERV.	16	Y	pg. 1, line 1; pg. 2, lines 1 and 2; pg. 5, lines 1-3; pg. 6, line 1; pgs. 8 and 9, line 1; pgs. 11 and 12, lines 1 and 2; pg. 13, line 1 and 2; pg. 14, lines 1-19; pg. 15, lines 1-26; pg. 16, lines 1-10	(e), (h) (f) Names of employees of FPL Services: (h) All other information: (e)	DB/JH DB DB/JH
45-10/2-18	INTERVIEW NOTES FOR RATES PROD. MGR.	11	Y	Pg. 2, line 1; pg. 3, lines 1-4; pg. 6, line 1; pg. 7, lines 1 and 2; pgs. 10 and 11, line 1	(h) (e) (h) (e) (f)	JH DB/JH JH DB/JH DB
45-10/2-19	INTERVIEW NOTES FOR TERRITORY SALES & SERV. MGR.	8	Y	pg. 1, lines 1-3; pg. 5, lines 1 and 2; pg. 7, line 1	(e), (h)	JH
45-10/2-20	INTERVIEW NOTES FOR MAJOR ACCT. MGR.	10	Y	pg. 2, lines 1-4; pg. 3, line 1; pg. 6, lines 1-3; pg. 6, line 4; pg. 8, line 1; pg. 9, lines 1 and 2; pg. 10, lines 1-7	(h) (e) (h) (e) (f) (e)	JH JH JH JH DB JH

45-10/2-21	INTERVIEW NOTES FOR MAJOR ACCT. MGR.	42	Y	<p>pg. 1, lines 1-4; pg. 3, line 1; pg. 5, lines 1-5; pg. 7, line 1; pg. 9, lines 1-3;</p> <p>pgs. 10 and 11, line 1;</p> <p>pg. 12, lines 1-7, col. A-E; pg. 13, lines 1-20; pgs. 14-16, all; pg 17, line 1, col. A, lines 3-8, 10, 12, 13-31, col. B, lines 3, 6-9, 11, 17, 19-31; pg. 18, lines 1, col. A and B, lines 2-13; pg. 19, line 1, col. A, lines 2, 3, 4, 7, 8, 10, 11-18; col. B, lines 2, 5-7, 8, 14, 16 and 17; pgs. 20-22, all; pg. 23, line 1, col. A, lines 2-5, 7, 9, 9a and 2c, col. B, lines 2, 5-8, 11, 12-18; pg. 24, lines 1 and 2; pgs. 25-27, all; pg. 28, line 1, col. A, lines 2-6, 8-11a, 13-22, col. B, lines 2, 5-7, 12, 13-22; pg. 29, lines 1-14; pgs. 30 and 31, all; pg. 32, lines 1-18; pg. 33, line 1, col. A, lines 2-4, 7, 10-21, col. B, lines 2, 5-9, 15, 17-21; pg. 34, lines 1-8; pg. 35, line 1, col. A, lines 2-5, 7a-24, col. B, lines 2, 5-7a, 14-24; pg. 36, lines 1 and 2; pgs. 37-39, all; pg. 40, col. A-I; pgs. 41 and 42, all</p>	<p>(e), (h) Names of employees of FPL Services: (h) All other information: (e)</p> <p>(f)</p> <p>Names of employees of FPL Services: (h) All other information: (e)</p>	<p>DB/JH</p> <p>DB</p> <p>DB/JH</p>
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	45-10/2-22	INTERVIEW NOTES FOR NATIONAL ACCT, MGR.	38	Y	<p>pg. 9, lines 1 and 2; pg. 10, line 1;</p> <p>pg. 11, col. A-H; pg. 12, lines 1-20; pgs. 13-15, all; pg. 16, line 1, col. A, lines 2-7, 10-32, col. B, lines 2, 5-7, 8-9, 11, 18, 20-32; pg. 17, line 1, col. A and B, lines 1-12; pg. 18, line 1, col. A, lines 2-5, 7, 9-18, col. B, lines 2, 5-9, 15, 17-19; pgs. 19-21, all; pg. 22, line 1, col. A, lines 1-4, 6, 8 and 9, 11-19, col. B, lines 1, 4-7, 10, 11-17; pg. 23, lines 1 and 2; pgs 24-26, all, pg. 27, line 1, col. A, lines 2-5, 7, 9-12a, 14-23; col. B, lines 2, 5-8, 13, 14-23; pg. 28, lines 1-14; pgs. 29-30, all; pg. 31, lines 1-21; pg.32, line 1, col. A, lines 2-4, 6, 8-21, col. B, lines 2, 4-7, 9, 15, 17-21; pg. 33, lines 1-8; pg. 34, line 1, col. A, lines 1-4, 6-21, col. B, lines 1, 4-6d, 11-21; pg. 35, lines 1 and 2; pgs. 36-38, all</p>	<p>(e), (h)</p> <p>(f)</p> <p>Names of employees of FPL Services: (h) All other information: (e)</p>	<p>JH</p> <p>DB</p> <p>JH</p>
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	45-10/2-23	INTERVIEW NOTES FOR MARKET SALES SPECIALIST	19	Y	<p>Pg. 1, line 1; pg. 2, line 1 and lines 3-4; pg. 3, lines 1-3; pg. 5, line 1; pg.7, lines 2-3; pg. 8, lines 1-3; pg. 9, lines 1 and 2;</p> <p>pgs. 10 and 11, line 1;</p> <p>pg. 12, lines 1-14; pg. 13, lines 1-16; pg. 14, lines 1-11; pg. 15, lines 1-15; pg. 16, lines 1-12; pg. 17, lines 1-9, pg. 18, lines 1-10; pg. 19, lines 1-9</p>	<p>(e), (h) Names of employees of FPL Services: (h) All other information: (e)</p> <p>(f)</p> <p>Names of employees of FPL Services: (h) All other information: (e)</p>	<p>DB/JH</p> <p>DB</p> <p>DB/JH</p>
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	45-10/2-24	INTERVIEW NOTES FOR MAJ. ACCT. MGR.	40	Y	<p>pg. 3, lines 1-3; pg. 8, lines 1-3; pg. 9, lines 1-4;</p> <p>pg. 10, line 1;</p> <p>pg. 11, col. A; pg. 12, col. A-H; pg. 13, lines 1-21; pgs. 14-16, all; pg. 17, line 1, col. A, lines 1-6, 9-29, col. b., lines 1, 4-8, 10, 15, 17-29; pg. 18, line 1, col. A, lines 2-12; col. B, 2-13; pg. 19, line 1, col. A, lines 1-4, 6, 8-18, co. B, lines 1, 4-6, 7, 9, 14, 16 and 17; pgs 20-22, all; pg. 23, line 1, col. A, lines 1-4, 6, 8, 9, 11-19, col. B, lines 1, 4-6, 7, 10, 11-17; pg. 24, lines 1 and 2; pgs. 25-27, all; pg. 28, line 1, col. A, lines 1-4, 6, 8-12, 14-23, co. B, lines 1, 4-7, 13-23; pg. 29, lines 1-14; pgs. 30-31, all; pg. 32, lines 1-23; pg. 33, line 1, col. A, lines 2-5, 7-10, 12-22, col. B, line 2, 5-8 and 9a, 16, 18-22; pg. 34, lines 1-8; pg. 35, line 1, col. A, lines 2-4, 6, 8-24, col. B, line 2, 4-7,</p>	<p>(e), (h) Names of employees of FPL Services: (h) All other information: (e)</p> <p>(f) Names of employees of FPL Services: (h) All other information: (e)</p>	<p>DB/JH</p> <p>DB</p> <p>DB/JH</p> <p>19</p>
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45-10/2-25	INTERVIEW NOTES FOR SNR. MAJ. ACCT. MGR.	10	Y	pg. 2, line 1; pg. 3, lines 1-3; pg. 4 and 5, line 1; pg. 7, lines 1 and 2; pg. 8 and 9, line 1	(f) Names of employees of FPL Services: (h) All other information: (e)	DB DB/JH
45-10/2-26	INTERVIEW NOTES FOR ANALYST	14	Y	pg. 2, 6, line 1 pg. 10-13, line 1; pg. 14, lines 1 and 2	(h) (f) (h)	JH DB JH
45-10/2-27	INTERVIEW NOTES FOR MAJ. ACCT. MGR.	11	Y	Pg. 1, lines 2; pg. 2, line 1 pg. 2, line 2; pg. 3, lines 1-12; pg. 5, lines 1-4; pg. 6, lines 1-3; pg. 9 and 10, lines 1 and 2	(e) (f) Names of employees of FPL Services: (h) All other information: (e)	JH DB DB/JH

N/A	45-10/2-28	INTERVIEW NOTES FOR MAJ. ACCT. MGR.	11	Y	pg. 2, lines 1-3; pg. 3, lines 1-3, pg. 4, line 1; pg. 6, lines 1-7; pg. 7, lines 1-4; pg. 9, lines 1 and 2; pg. 10, line 1; pg. 11, line 1-12	(e), (h) Names of employees of FPL Services: (h) All other information: (e) (f) (e) (h)	DB/JH DB DB/JH
	45-13	STAFF ANALYSIS OF PAYROLL ALLOCATIONS	2	N	Pg. 1, lines 1 and 2		
	45-13/3	REQUEST FOR ALLOCATION INFO.	1	N			
	45-13/4	STAFF ANALYSIS OF ALLOCATION METHODOLOGY	1	N			
	45-13/4-1	ALLOCATION METHODOLOGY	1	N			
	45-13/4-2	ECCR GOALS AND BUDGET	7	N			
	45-12/4-3	LIST OF MAJOR ACCOUNT MANAGERS	1	N			
	45-13/4-4	ALLOCATIONS FOR 1997	1	N			
	45-13/4-5	1998 PAYROLL DISTRIBUTIONS	4	Y	Pg. 4, line 1	(f)	DB
	45-13/5	1998 BUDGET	2	N			
	45-13/5-1	REQUEST FOR ALLOCATIONS	2	N			
	46-1	STAFF ANALYSIS OF CONTRACT ASSIGNMENTS	1	Y	lines 1 and 2	(e)	JH
	46-2/1	FPL ASSIGNMENT FORM 2/12/96	1	Y	all	(e)	JH
	46-2/2	FPL ASSIGNMENT FROM 2/12/96	1	Y	all	(e)	JH
	46-2/3	FPL ASSIGNMENT FORM 2/26/96	1	Y	all	(e)	JH
	46-2/4	FPL ASSIGNMENT FORM 3/12/96	1	Y	all	(e)	JH
	46-3/1	ASSIGNMENT AGREEMENT	5	Y	all	(e)	JH
	46-3/2	ASSIGNMENT AGREEMENT 6/4/96	5	Y	all	(e)	JH
	46-3/3	ASSIGNMENT AGREEMENT 10/11/96	5	Y	all	(e)	JH
	46-3/4	ASSIGNMENT AGREEMENT 11/10/96	5	Y	all	(e)	JH
	46-3/5	ASSIGNMENT AGREEMENT 11/13/96	5	Y	all	(e)	JH
	46-3/6	ASSIGNMENT AGREEMENT 3/10/97	5	Y	all	(e)	JH
	46-3/7	ASSIGNMENT AGREEMENT 4/22/97	5	Y	all	(e)	JH
	47-4	COMMERCIAL INDUSTRIAL LOAD CONTROL IMPLEMENTATION SEMINAR FOR FPL	23	Y	all	(e)	DB
	47-5	ELECTRIC ENERGY CONSERVATION TEAM INFORMATION	10	Y	all	(e)	DB
	52	LIST OF VENDORS AND CUSTOMERS	3	Y	pg. 2, col. A-D, all; pg. 3, col. A-D, lines 1 and 2	(e)	DB
	52-1/1	CONTRACTOR REPORT-LINE FORMAL ALL AREAS, CONTRACTOR NAME, BUSINESS ADDRESS, CITY, ZIP CODE, BUSINESS PHONE	9	N			
	52-2/1	1997 COMMERCIAL INDUSTRIAL LIGHTING REBATE CUSTOMERS	10	Y	All	(e)	DB
	52-2/2	1996 COMMERCIAL INDUSTRIAL LIGHTING REBATE CUSTOMERS	53	Y	All	(e)	DB

53	ANALYSIS OF REVIEW OF FPL ENERGY SERVICES FILES	6	Y	pg. 1, lines 1-8; pg. 2, lines 1-9; pg. 3, lines 1-13; pg. 4, lines 1-6; pg. 5, lines 1-2; pg. 6, line 1	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
53-1	NOTES FROM PLANTATION OFFICE FILE	8	Y	pg. 1, lines 1-11; pg. 2, lines 1-14; pg. 3, lines 1-10; pg. 4, lines 1-15; pg. 5, lines 1-11; pg. 6, lines 1-8; pg. 7, lines 1-8 pg. 8, lines 1-6	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
53-2	NOTES FROM MARGATE OFFICE FILE	10	Y	pg. 1, lines 1-3; pg. 2, lines 1-5; pg. 3, lines 1-4; pg. 4, line 1; pg. 4, line 2; pg. 5, lines 1-11; pg. 6, lines 1-4; pg. 7, line 1; pg. 8, lines 1-5; pg. 9, lines 1-3	(e) (h) (e)	JH JH JH
53-3	NOTES FROM ENERGY SERVICES FILES	3	Y	pg. 1, col. A-E; pg. 2, lines 1-28; pg. 3, lines 1-19	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH

N/A	53-4	NOTES FROM ENERGY SERVICES FILE	4	Y	pg. 1, col. A, col. B, lines 1-3, col. C, lines 1-2; pg. 2, lines 1-17; pg. 3, lines 1-14; pg. 4, lines 1-8	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
	53-5	NOTES FROM ENERGY SERVICES FILE	28	Y	pg. 1, col. A-H; pg. 2, lines 1-20; pg. 3-5, all; pg. 6, line 1, col. A, lines 1-3, 5, 6a, 7-14, col. B, lines 1, 4, 6a, 6b-6e, 8, 13, 15-27; pg. 7, line 1, col. A, lines 1-12; pg. 8, line 1, col. A, lines 2-5, 7, 9-16, 19, col. B, lines 2, 5-8, 10, 15, 17-18; pgs. 9-11, all; pg. 12, line 1, col. A, lines 2-4, 7, 9-11, 20-21, col. B, lines 2, 5-8, 12, 13-19; pg. 13, lines 1-2; pgs. 14-16, all; pg. 17, line 1, col. A, lines 1-3, 6, 8-12, col B, lines 1, 4-7, 13-23; pg. 18, lines 1-14; pg. 19-20, all; pg. 21, lines 1-23; pg. 22, line 1, col. A, lines 1-2, 5, 8-14, col. B, lines 1, 3-7, 13, 15-19; pg. 23, lines 1-8; pg. 24, line 1, col. A, lines 2-4, 7, 9-16, col. B, lines 2, 5-8, 15-25; pg. 25, lines 1-2; pgs. 26-28, all	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH

53-6	NOTES FROM ENERGY SERVICES FILE	1	Y	col. A-B; col. C	(e) (h)	JH JH
53-7	NOTES FROM ENERGY SERVICES FILE	4	Y	pg. 1, col. A-C; pgs. 2-3, all; pg. 4, lines 1-13	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
53-8	NOTES FROM ENERGY SERVICES FILE	2	Y	pg. 1, col. A-C; pg. 2, line 1, col. A, lines 1-3, 6, 9, 1-14, col. B, lines 1, 2, 7-10, 14-27	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
53-9	NOTES FROM ENERGY SERVICES FILE	1	Y	col. A-B, D col. C	(e) (h)	JH JH
53-10	NOTES FROM ENERGY SERVICES FILE	1	Y	line 1, col A, lines 2-4, 5-8, col. b, lines 2, 4b-6, 9-10	(h) (e)	JH JH
53-11	NOTES FROM ENERGY SERVICES FILE	3	Y	pg. 1, line 1, col. A, lines 2-5, 7, 9-11, col. B, lines 2, 5-7, 8; pg. 2, lines 1-8; pg. 3, lines 1-3, col. A-X, all	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
53-12	NOTES FROM ENERGY SERVICES FILE	3	Y	pg. 1, line 2, col. A, lines 1-3, 6, 8-12, col. B, lines 1, 4-7, 13-26; pg. 2, line 1, col. A, all; pg. 3, lines 1-22	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH

53-13	NOTES FROM ENERGY SERVICES FILE	2	Y	pg. 1, col. A, lines 1-3, 6, 8-10, col. B, 1, 4-7, 11-13; pg. 2, all	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
53-14	NOTES FROM ENERGY SERVICES FILE	1	Y	Col A-H	(e), (h)	JH
53-15	NOTES FROM ENERGY SERVICES FILE	3	Y	pg. 1, col. A-H, pgs 2-3, all	(e), (h)	JH
53-16	NOTES FROM ENERGY SERVICES FILE	1	Y	col. A-E	(e), (h)	JH
53-17	NOTES FROM ENERGY SERVICES FILE	1	Y	col. A-C	(e), (h)	JH
53-18	NOTES FROM ENERGY SERVICES FILE	1	Y	col. A-B	(e), (h)	JH
53-19	CCAS MAIN GENERATOR PROJECT-SCOPE OF AUDIT	1	Y	lines 1-20	(e), (h)	JH
53-20	LETTER FROM FPL SERVICES TO MR. KURT SQUITIER	1	Y	lines 1-12	(e), (h)	JH
53-21	INTEROFFICE CORRESPONDENCE TO Mike Philo, From: N.H. Chau	3	Y	pg. 1, line 1; pg. 2, lines 1-4	(e), (h)	JH
53-23	JFK MEETING MINUTES 9/30/94 FPL SERVICES	2	Y	pg. 1, lines 1-23; pg. 2, lines 1-9	(e), (h)	JH
53-24	LETTER (FPL SERVICES) TO MR. TARBOX, FROM: JOHN HANEY	3	Y	pg. 1, lines 3-27; pg. 2, lines 1-13; pg. 3, col. A, lines 1-9; col. B, all; pg. 2, lines 10-13	(e) (h)	JH JH
53-29	LETTER-FPL SERVICES	4	Y	pg. 1, lines 1-6; pg. 2, lines 1-15; pg. 3, lines 1-18; pg. 4, lines 1-18	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
55	REVIEW OF THE FPL SERVICES FILES FOR INDICATION OF CROSS SUBSIDY	3	Y	pg. 1, lines 1-6; pg. 2, lines 1-5; pg. 3, lines 1-3	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH

55-1	SERVICE EMPLOYEES & LOCATION	2	Y	pg. 1, col. A, all; pg. 2, line 1	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
55-3	EMPLOYEE WHO HAVE ACCESS TO FPL CUSTOMER	5	Y	pg. 5, lines 1 and 2	(h) Names of employees of FPL Services: (h) All other information: (e)	JH
55-4	MEETING'S ON SERVICE EMPLOYEES	3	Y	pg. 1, lines 1-3; pg. 2, lines 1-4; pg. 3, lines 1-3	(e), (h)	JH
55-5	SAMPLE OF FPL SERVICES LETTERS	16	Y	pg. 1, lines 1-3; pg. 3, lines 1-27; pg. 4, all; pg. 5, lines 1-5; pg. 6, lines 1-16; pg. 7, lines 1-17; pg. 8, lines 1-3; pg. 9 lines 1-10; pg. 10, lines 1-15; pg. 11, lines 1-21; pg. 12, lines 1-2; pg. 13, lines 1-11	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
55-6	COPY OF FPL SERVICES STANDARD PRESENTATION TO CUSTOMERS	6	Y	All	(e)	JH
55-7	LETTERS FROM BREVARD	2	N			
55-8	LETTER TO JAIME G. TORRENS, FROM M.M. STURMER, ARM	1	Y	lines 1-2	(h)	JH
55-9	SCHOOLS ELECTRIC ACCOUNTS	37	Y	pg. 1, col. A-C; pg. 2, lines 1-4, pg. 3, lines 1-6; pgs. 5-36, lines 1-4; pg. 37, lines 1-3	(g) (h)	DB JH

	55-10	LOAD DATA TRANSFERRED	7	Y	pg. 1, lines 1-6; pg. 2, line 1, col. A, lines 2-4, 7-12, col. B, lines 2, 5-7, 13; pg. 3, line 1, col. A, lines 2-4, 7-12, col. B, lines 2, 5-9, 13-5; pg. 4, lines 1-4; pg. 5-6, all; pg. 7, lines 1-8	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
	55-10/1	SERVICE RECEIVED LOAD DATA WITHOUT AUTHORIZATION	1	Y	line 1	(e)	JH
	55-11	TRANSFER OF DATA 96-97	9	Y	pg. 1, lines 1-6; pg. 2, col. A, all; pg. 3, lines 1-3; pg. 4, lines 1-7; pg. 5, lines 1-9; pg. 6, lines 1-15; pg. 7, line 1-2; pg. 8, lines 1-10; pg. 9, lines 1-2, col. A-	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH
	55-12	SOLICITING BUSINESS FOR SERVICES	4	Y	pgs 1-2, lines 1-2; pg. 3, lines 1 and 2; pg. 4, lines 1-18	(e), (h)	JH
N/A	55-13	LETTER PROMOTING SERVICES	2	Y	pg. 1, lines 1-4; pg. 2, lines 1-4;	(e)	DB
	55-14	SOLICITATION LETTER	1	Y	lines 1-3	(e)	JH
	55-15	SOLICIT MEETING	1	Y	lines 1-7	(e)	DB
	55-16	AIR FORCE LETTER	2	N			
	55-17	LETTERS ABOUT CUSTOMERS	1	Y	lines 1-5, 14; lines 6-13, 15	(h) (e), (h)	JH JH
	55-18	LETTERS ABOUT CUSTOMERS	2		pg. 1, lines 1-26; pg. 2, lines 1-10	(e), (h)	JH
	55-19	CLEAN LETTERS	10		pg. 1, lines 1-6; pg. 2, lines 1-14; pg. 3, lines 1-10; pg. 4, all; pg. 5, lines 1-10; pg. 6, lines 1-13; pg. 7, lines 1-14; pg. 8, lines 1-12; pg. 8, lines 1-12; pg. 9, lines 1-2; pg. 10, lines 1-4	(e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH

55-20	MEETINGS WITH MEETING MINUTES FOR SPARC	9		pg. 1, lines 1-2; pg. 4, line 1; pg. 5, line 1; pg. 6, lines 1-2; pg. 8, lines 1-8; pg. 9, lines 1-19	(h) (e), (h) Names of employees of FPL Services: (h) All other information: (e)	JH JH

COMPANY: FPL
TITLE: LIST OF CONFIDENTIAL WORKPAPERS
AUDIT: COST ALLOCATION BETWEEN FPL/FPL SERVICES AUDIT REPORT
DATE: December 7, 1999
AUDIT CONTROL NO.: 97-233-4-1

PAGE NO.	DESCRIPTION	CONF Y/N	LINE NO./ COLUMN NO.	STATUTE	
				366.093(3)	Section: AFFIDAVIT
1	Auditor's Report	N			
2	Auditor's Report	N			
3	Auditor's Report	Y	Lines 1-3	(e)	JH/DB
4	Auditor's Report	N			
5	Auditor's Report	Y	Lines 1-9	(e)	JH/DB
6	Auditor's Report	Y	Lines 1-2	(e)	DB
7	Auditor's Report	Y	Lines 1-3	(e)	DB
8	Auditor's Report	Y	Line 1	(e)	DB
9	Auditor's Report	N			
10	Auditor's Report	N			
11	Auditor's Report	N			
12	Auditor's Report	Y	Lines 1-2; Col. A, Lines 3-10	(e)	JH/DB
13	Auditor's Report	Y	Lines 1-2	(e)	DB
14	Auditor's Report	N			
15	<i>Auditor's Report</i>	N			
16	Auditor's Report	N			
17	Auditor's Report	N			
18	<i>Auditor's Report</i>	N			
19	Auditor's Report	Y	Lines 1-2	(e)	JH
Pages 1-5	Attachment 1	N			
Page 6	Attachment 1	Y	Col. A-D	(f)	MM
Page 7	Attachment 1	Y	Line 1	(e)	JH
Page 1	Attachment 2	Y	All lines	(e)	DB

Exhibit D

AFFIDAVITS

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of Florida Power)	DOCKET NO: 980190-EI
& Light Company's Request for)	
Confidential Classification in)	
The Cost Allocation Between)	
FPL and FPL Services Audit)	

STATE OF FLORIDA
COUNTY OF DADE

AFFIDAVIT OF RICK DEL CUETO

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 internal auditing controls and reports of internal auditors or information relating to same. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. FPL has maintained and continues to maintain the confidentiality of such information and does not disclose such information to third parties except as required by law or with the permission of the customer. Nothing has changed to alter the confidential nature of the information since the Commission's Order No. PSC-98-0931-CFO-EI granting confidential treatment.

4. The obtained materials should remain confidential for an additional 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 maintain the confidential nature of these documents.

5. Affiant says nothing further.


Rick Del Cueto

Affidavit of Rick Del Cueto
Request for Confidential Classification
Docket No. 990001-EI/Capacity Clause Audit No. 99-025-4-1
Page 2 of 2

SWORN TO AND SUBSCRIBED before me this 3 day of December, 1999
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:



Bertila Estopinales
MY COMMISSION # CC802392 EXPIRES
January 14, 2003
BONDED THRU TROYFAM INSURANCE, INC.

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of Florida Power)	DOCKET NO: 980190-EI
& Light Company's Request for)	
Confidential Classification in)	
The Cost Allocation Between)	
FPL and FPL Services Audit)	

AFFIDAVIT OF MARK MITCHELL

STATE OF FLORIDA
COUNTY OF DADE

Before me the undersigned authority personally appeared Mark Mitchell who, being first duly sworn, deposes and says:

1. My name is Mark Mitchell. I am currently employed by Florida Power & Light Company (FPL) as Manager of Human Resources and Compensation Planning. I have personal knowledge of the matters stated in this affidavit.

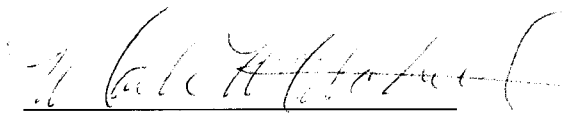
2. All matters identified as exempt from disclosure pursuant to Florida Statute Section 366.093(3) with lines marked (e) and with my initials in the affidavit column on the justification matrix (Exhibit C) consist of information relating to FPL's compensation structure and, therefore, to FPL's competitive interests, the disclosure of which would impair FPL's competitive business within the meaning of 366.093(3)(e). FPL Services has maintained and continues to maintain the confidentiality of such information.

3. The obtained materials should remain confidential for a period of not less than 18 months and should be returned to FPL Services as soon as the information is no longer necessary for the Commission to conduct its business so that FPL Services can maintain the confidential nature of these documents.

4. Nothing has changed to alter the confidential nature of the information since the Commission's Order No. PSC-98-0931-CFO-EI granting confidential treatment.

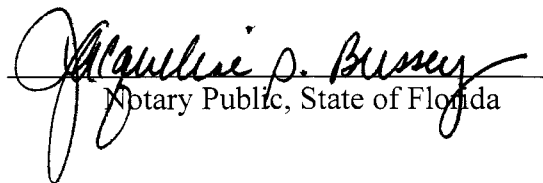
5. The obtained materials should remain confidential for an additional period of not less than 18 months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can maintain the confidential nature of these documents.

6. Affiant says nothing further.



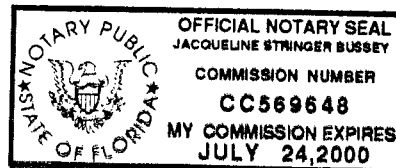
Mark Mitchell

SWORN TO AND SUBSCRIBED before me this 16th day of December, 1999, by Mark Mitchell, who is personally known to me or who has produced driver's license (type of identification) as identification and who did take an oath.



Notary Public, State of Florida

My Commission Expires



**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of Florida Power)	DOCKET NO: 980190-EI
& Light Company's Request for)	
Confidential Classification in)	
The Cost Allocation Between)	
FPL and FPL Services Audit)	

AFFIDAVIT OF DENNIS BRANDT

STATE OF FLORIDA
COUNTY OF MIAMI/DADE

Before me the undersigned authority personally appeared Dennis Brandt who, being first duly sworn, deposes and says:

1. My name is Dennis Brandt. I am currently employed by Florida Power & Light Company (FPL) as Director, Sales and Marketing Support and Services. I have personal knowledge of the matters stated in this affidavit.

2. All matters identified as exempt from disclosure pursuant to Florida Statute Section 366.093(3) with lines marked (e) and with my initials in the affidavit column on the justification matrix (Exhibit C) consist of information relating to FPL's competitive interests, the disclosure of which would impair FPL's competitive business within the meaning of 366.093(3)(e). FPL has maintained and continues to maintain the confidentiality of such information.

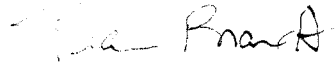
3. All matters identified as exempt from disclosure pursuant to Florida Statute Section 366.093(3) with lines marked (f) and with my initials in the affidavit column on the justification matrix (Exhibit C) consist of employee personnel information unrelated to compensation, duties, qualifications, or responsibilities within the meaning of 366.093(3)(f).

4. All matters identified as exempt from disclosure pursuant to Florida Statute Section 366.093(3) with lines marked "(g)" and with my initials in the affidavit column on the justification matrix (Exhibit C) consist of information related to or derived from certain

customers' account information. Such information is intended to be and is treated by FPL as private in that disclosure of the information could cause harm to its customers. FPL has maintained and continues to maintain the confidentiality of such information and does not disclose such information to third parties except as required by law or with the permission of the customer. Nothing has changed to alter the confidential nature of the information since the Commission's Order No. PSC-98-0931-CFO-EI granting confidential treatment.

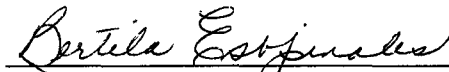
5. The obtained materials should remain confidential for an additional period of not less than 18 months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can maintain the confidential nature of these documents.

6. Affiant says nothing further.



Dennis Brandt

SWORN TO AND SUBSCRIBED before me this 3 day of December, 1999
Dennis Brandt, 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 Estephanos
MY COMMISSION # CC802392 EXPIRES
January 14, 2003
BONDED THRU TROY FAIN INSURANCE, INC.

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of Florida Power)
& Light Company's Request for)
Confidential Classification in)
The Cost Allocation Between)
FPL and FPL Services Audit)

DOCKET NO: 980190-EI

AFFIDAVIT OF JOHN HANEY

STATE OF FLORIDA
COUNTY OF DADE

Before me the undersigned authority personally appeared John Haney who, being first duly sworn, deposes and says:

1. My name is John Haney. I am currently employed by FPL Services as General Manager. I have personal knowledge of the matters stated in this affidavit.

2. All matters identified as exempt from disclosure pursuant to Florida Statute Section 366.093(3) with lines marked (e) and with my initials in the affidavit column on the justification matrix (Exhibit C) consist of information relating to FPL Services= competitive interests, the disclosure of which would impair FPL Services= competitive business within the meaning of 366.093(3)(e). FPL Services has maintained and continues to maintain the confidentiality of such information.

3. All matters identified as exempt from disclosure pursuant to Florida Statute Section 366.093(3) with lines marked (h) and with my initials in the affidavit column on the justification matrix (Exhibit C) consist of information which links specific names of FPL Services= employees with the specific markets in which they specialize. Because of the very competitive nature of the energy services industry, the release of such information to competitors would impair the competitive business of FPL Services within the meaning of 366.093(3)(e) in that it would likely result in the solicitation of employment by competitors of FPL Services= employees in attempts to gain access to FPL Services= proprietary business information and markets.

4. All matters identified as exempt from disclosure pursuant to Florida Statute Section 366.093(3) with lines marked A(g)@ and with my initials in the affidavit column on the justification matrix (Exhibit C) consist of information related to or derived from certain customers= account information. Such information is intended to be and is treated by FPL as private in that disclosure of the information could cause harm to its customers. FPL has

maintained and continues to maintain the confidentiality of such information and does not disclose such information to third parties except as required by law or with the permission of the customer. Nothing has changed to alter the confidential nature of the information since the Commission's Order No. PSC-98-0931-CFO-EI granting confidential treatment.

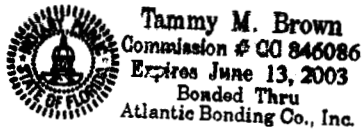
5. The obtained materials should remain confidential for an additional period of not less than 18 months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can maintain the confidential nature of these documents.

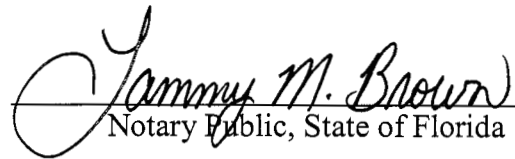
6. Affiant says nothing further.



John Haney

SWORN TO AND SUBSCRIBED before me this 3rd day of December, 1999, by John Haney, 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: June 13, 2003