



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) 691-7135 (Facsimile)

ORIGINAL
RECEIVED-FPSC
00 OCT 17 PM 12:53
RECORDS AND REPORTING

October 17, 2000

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
Material Provided Pursuant to Audit No. 00-222-4-1**

001564-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. 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 an affidavit in support of FPL's Request for Confidential Classification. Also included herewith is a computer diskette containing FPL's Request and Exhibit C in Word Perfect 6/7/8 for Windows.

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.

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

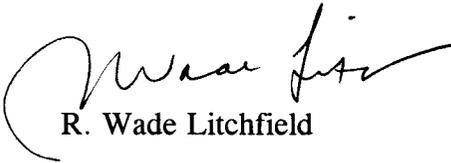
DOCUMENT NUMBER-DATE
13159 OCT 17 00
FPSC-RECORDS/REPORTING

Ms. Blanca Bayo
October 17, 2000
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,



R. Wade Litchfield

RWL/jsb
Enclosures

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's)
Request for Confidential Classification)
Of Material Provided pursuant to)
Audit No. 00-222-4-1)

Docket No: 001564-EI
Filed October 17, 2000

REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF MATERIALS PROVIDED IN AUDIT NO. 00-222-4-1

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 requests confidential classification of certain materials provided to the Florida Public Service Commission ("FPSC" or "Commission") staff ("Staff") in connection with the staff audit identified as Audit Control No. 00-222-4-1 (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) 691-7135 Facsimile

DOCUMENT NUMBER-DATE

13159 OCT 17 8

FPSC-RECORDS/REPORTING

2. During the Audit, Staff requested access to various FPL reports and other documents. By letter dated September 27, 2000 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 October 18, 2000, within which to file a formal Request for Confidential Classification with respect to such workpapers. FPL hereby submits 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 Sol Stamm and Rick Del Cueto.

4. FPL seeks confidential protection for the information highlighted in Exhibit A. This information principally consists of FiberNet's financial projections, operating results, contract and

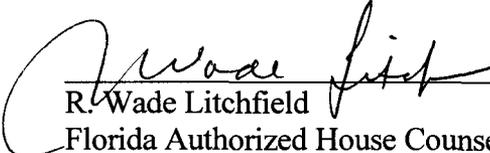
pricing information, cost data, and internal audits or audit reports. The information also includes detailed descriptions by location of FiberNet's telecommunications system and equipment that would tend to reveal FiberNet's system capabilities and/or deficiencies by location. This information, if made public, would afford FiberNet's competitors an unfair advantage over FiberNet and would impair FiberNet's efforts to enter into contracts on commercially favorable terms. Disclosure of pricing and other contractual terms could also impair the competitive business of FiberNet's customers.

5. 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.

6. Upon a finding by the Commission that the material in Exhibit A for which FPL seeks confidential treatment is proprietary confidential business information, pursuant to section 366.093(4) such materials should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,



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

Exhibit A

CONFIDENTIAL DOCUMENTS

(SUBMITTED SEPARATELY)

Exhibit A

CONFIDENTIAL DOCUMENTS

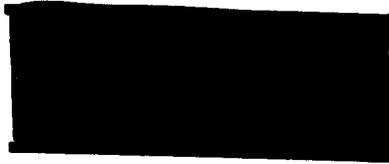
Exhibit B

REDACTED DOCUMENTS

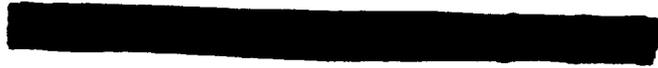


FPL

1



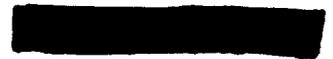
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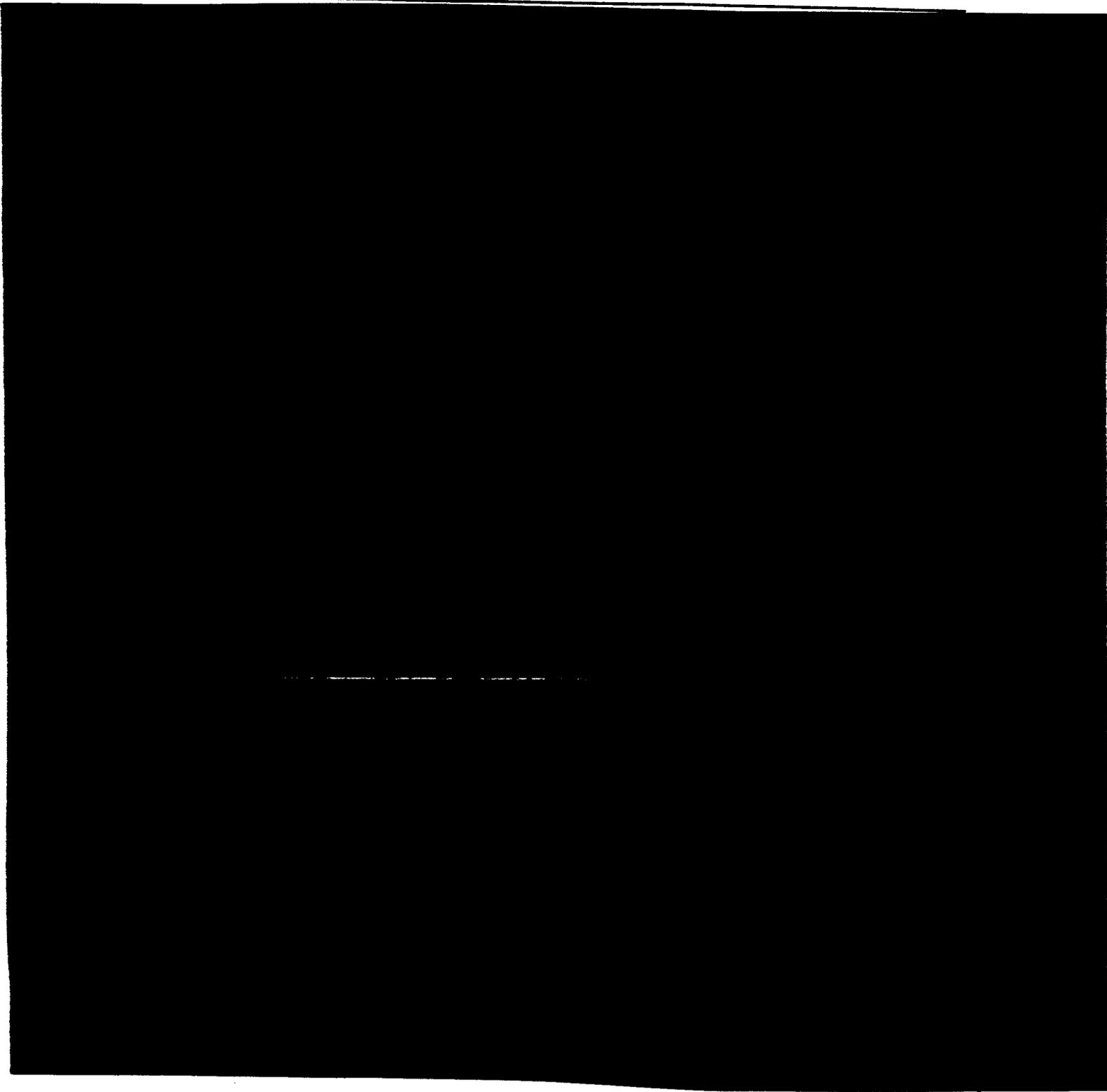
9

P. 1



FPL

Inter Office Correspondence

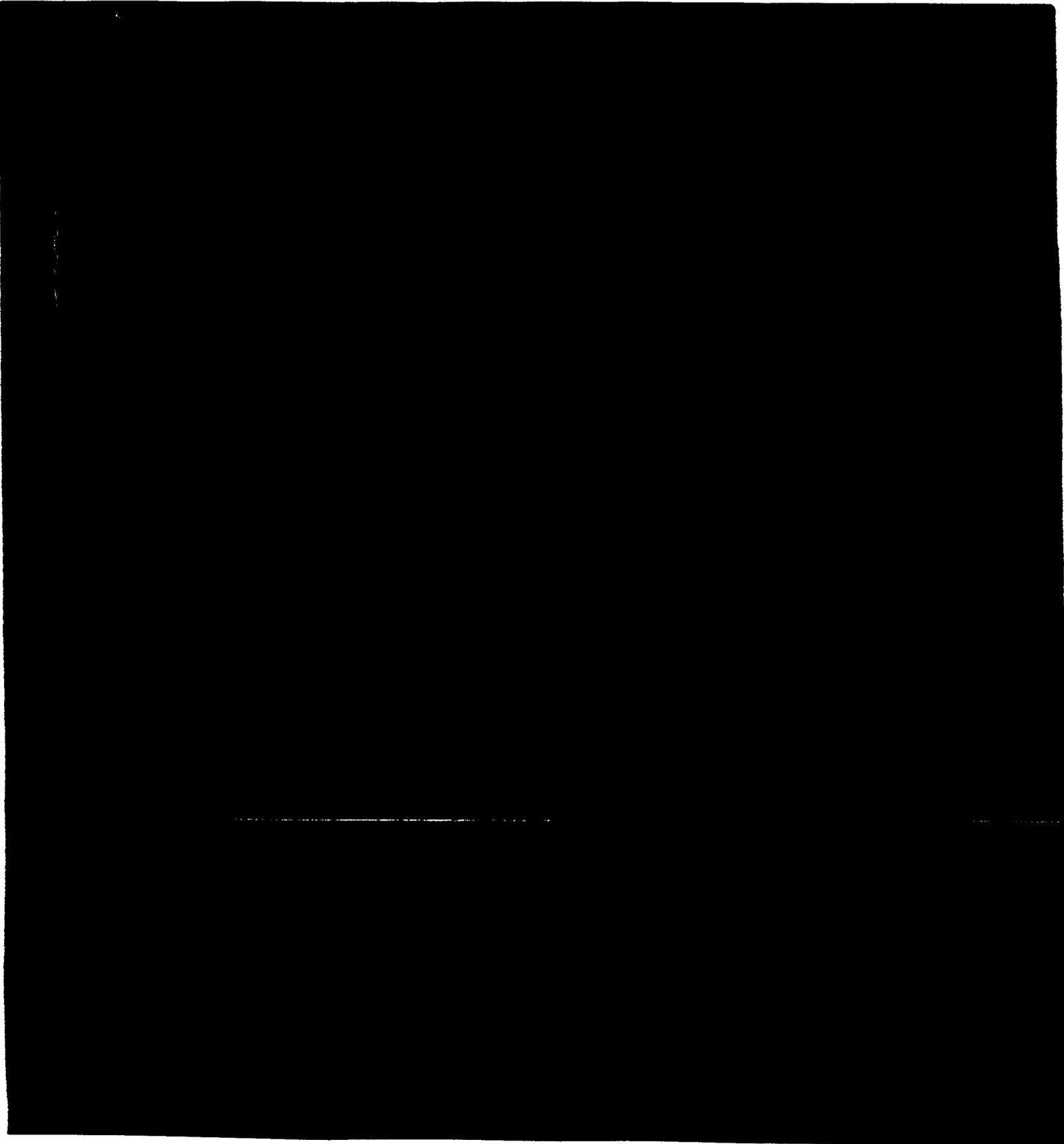


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p. 3

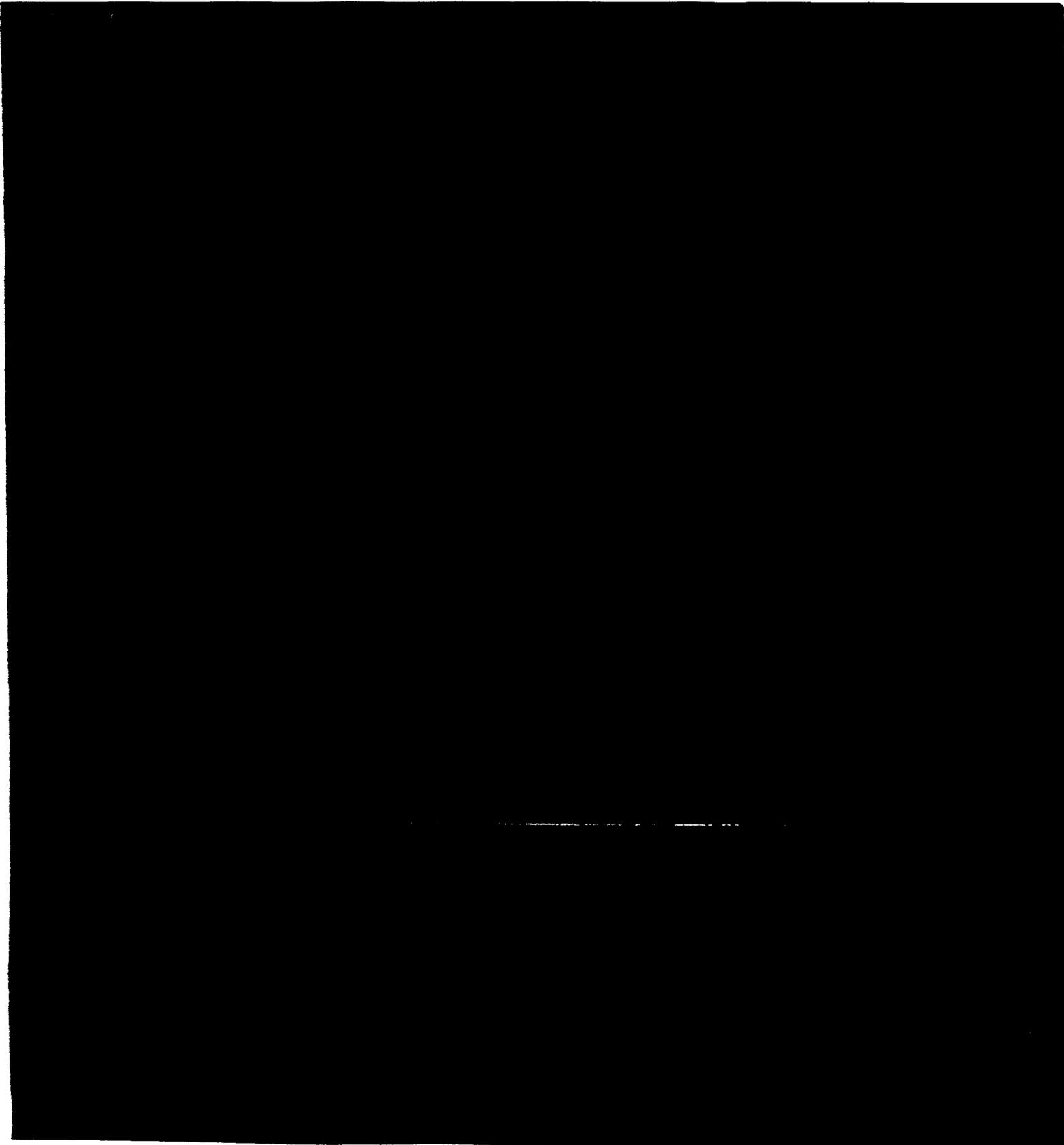
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P. 4



9

P. 5

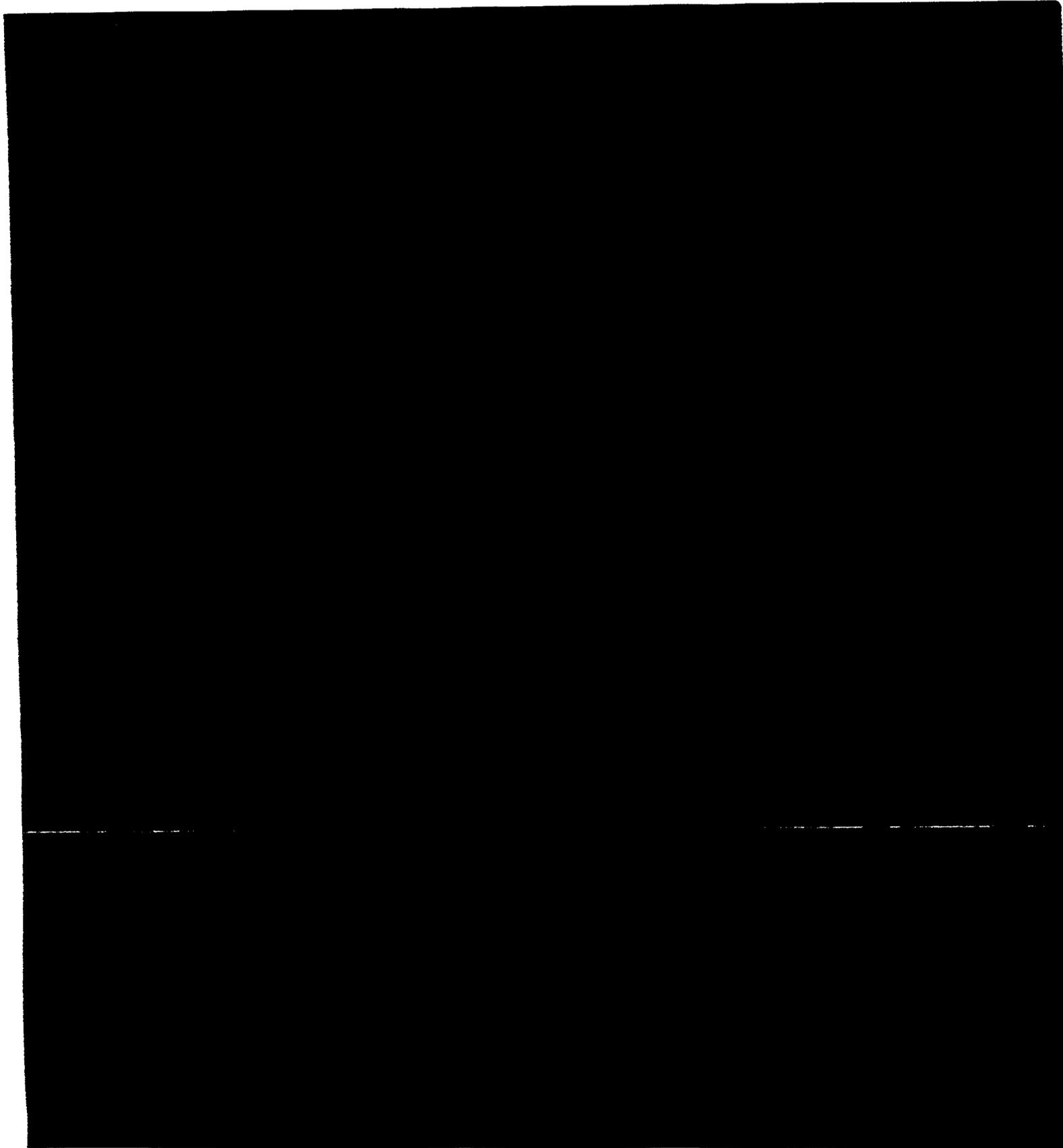


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P. 6

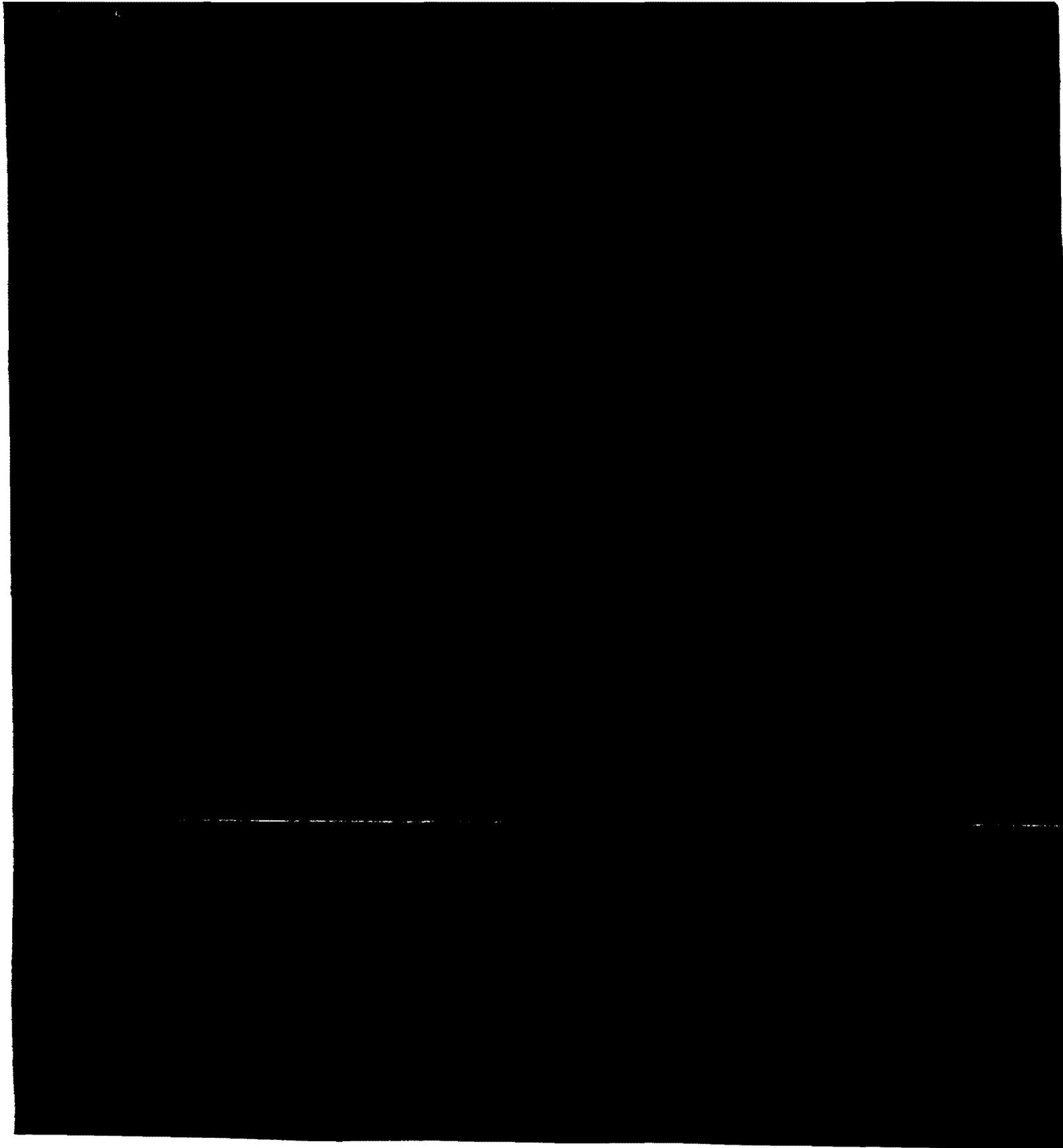
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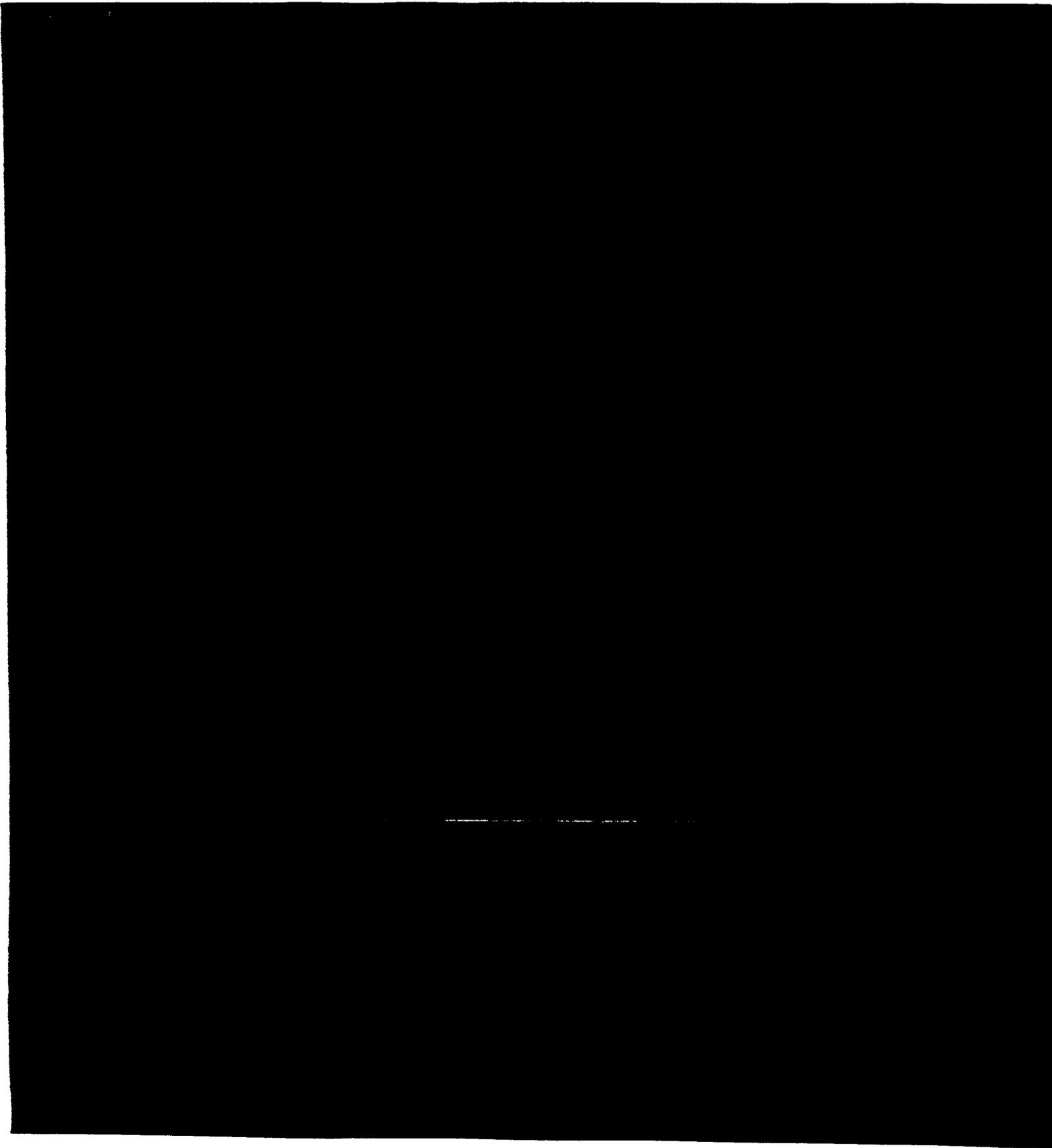
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p. 10



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P. 11



9

p. 12

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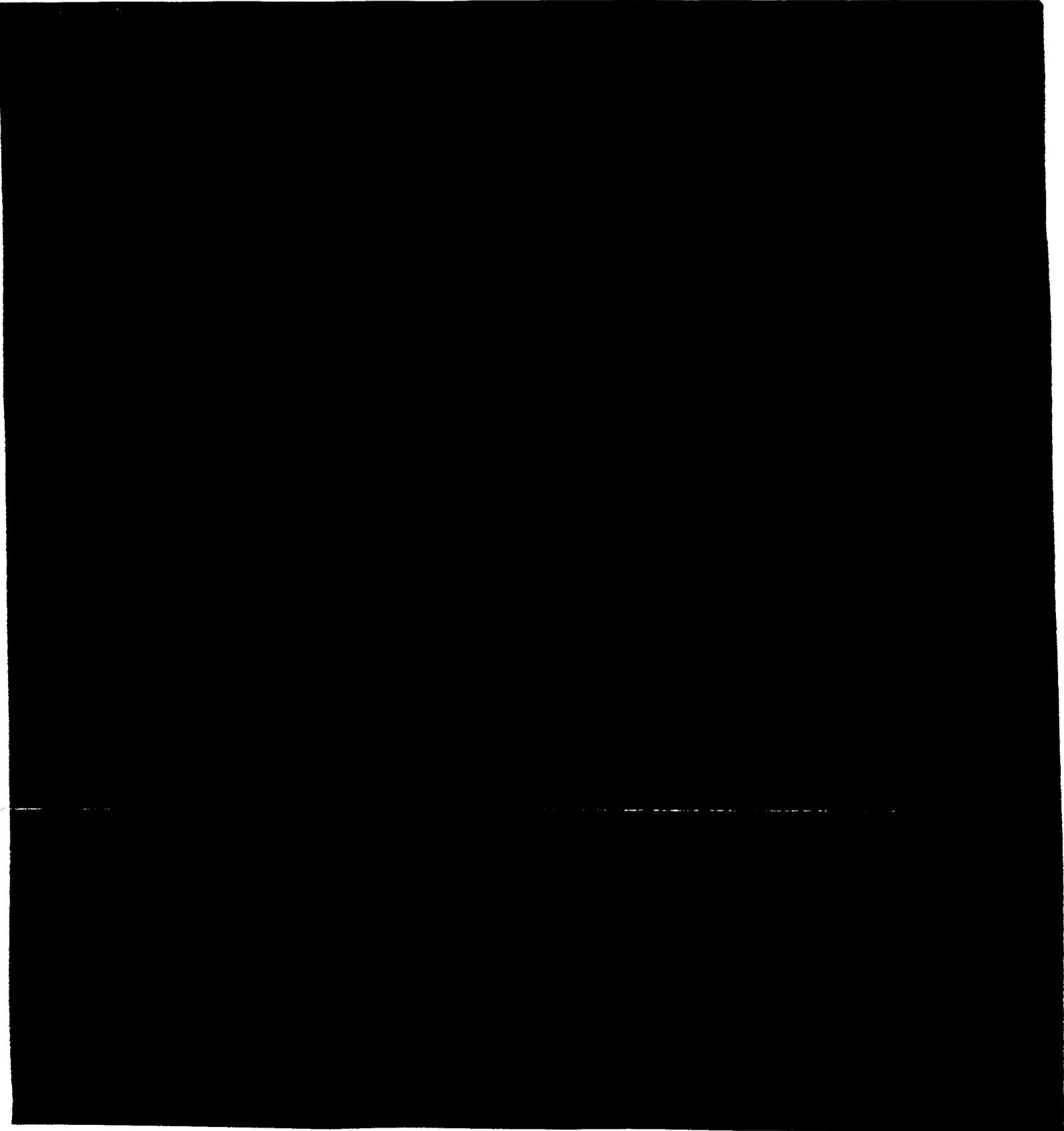
P. 13

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P. 14

9

P. 15



9

P. 16

9

P. 17

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: Dave Waiselinski
UTILITY: FPL
FROM: Raymond Grant
(AUDIT MANAGER)

Raymond Grant
(AUDITOR PREPARING REQUEST)

REQUEST NUMBER: 4
AUDIT PURPOSE: Earnings Surveillance Report

DATE OF REQUEST: 8/2/00

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: _____ (DATE)

REFERENCE RULE 25-22.006, F.A.C.. THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1	
2	
3	
4	
5	
6	
7	
8	<u>W&A Extract Report</u>
9	<u>See attached schedule</u>

TO: AUDIT MANAGER

DATE: 9-6-00

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) ALL IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.083, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Waiselinski
(SIGNATURE AND TITLE OF RESPONDENT)

DISTRIBUTION:
White: Utility Complete and Return to Auditor
Pink: Audit File Copy
Canary: Utility Retain

10-1

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: Dave Wajdelwala
UTILITY: FPL
FROM: Raymond Grand
(AUDIT MANAGER)

Raymond Grand
(AUDITOR PREPARING REQUEST)

REQUEST NUMBER: 5
AUDIT PURPOSE: Earnings Surveillance Report

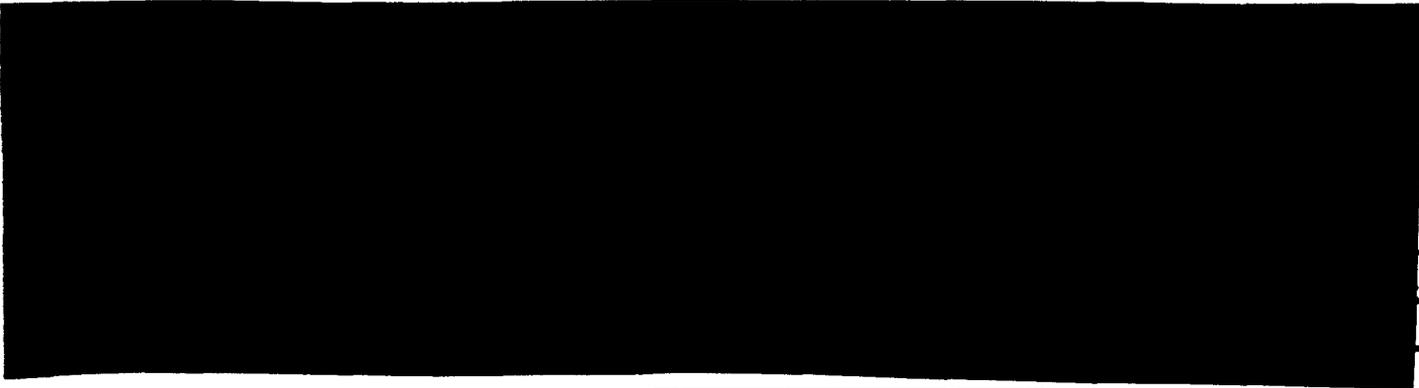
DATE OF REQUEST: 8/24/00

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: _____ (DATE) 8/28/00

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1
2
3
4
5
6
7



TO: AUDIT MANAGER _____

DATE: 9-6-00

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) ALL IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Wajdelwala
(SIGNATURE AND TITLE OF RESPONDENT)

DISTRIBUTION:
White: Utility Complete and Return to Auditor
Pink: Audit File Copy
Canary: Utility Retain

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: D. W.
UTILITY: FDL
FROM: _____
(AUDIT MANAGER)

Liliana Piedra
(AUDITOR PREPARING REQUEST)

REQUEST NUMBER: 8
AUDIT PURPOSE: _____

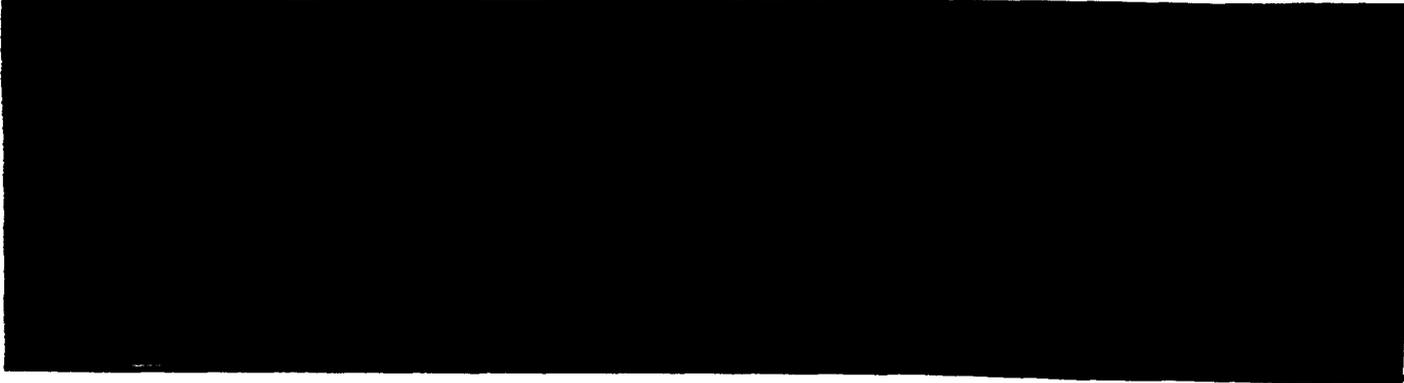
DATE OF REQUEST: 8/30/00

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: _____
(DATE) 9/5/00

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1) Provide Financials for January through April
2) 2000 for Fiberay.



TO: AUDIT MANAGER _____

DATE: 9-6-00

THE REQUESTED RECORD OR DOCUMENTATION:

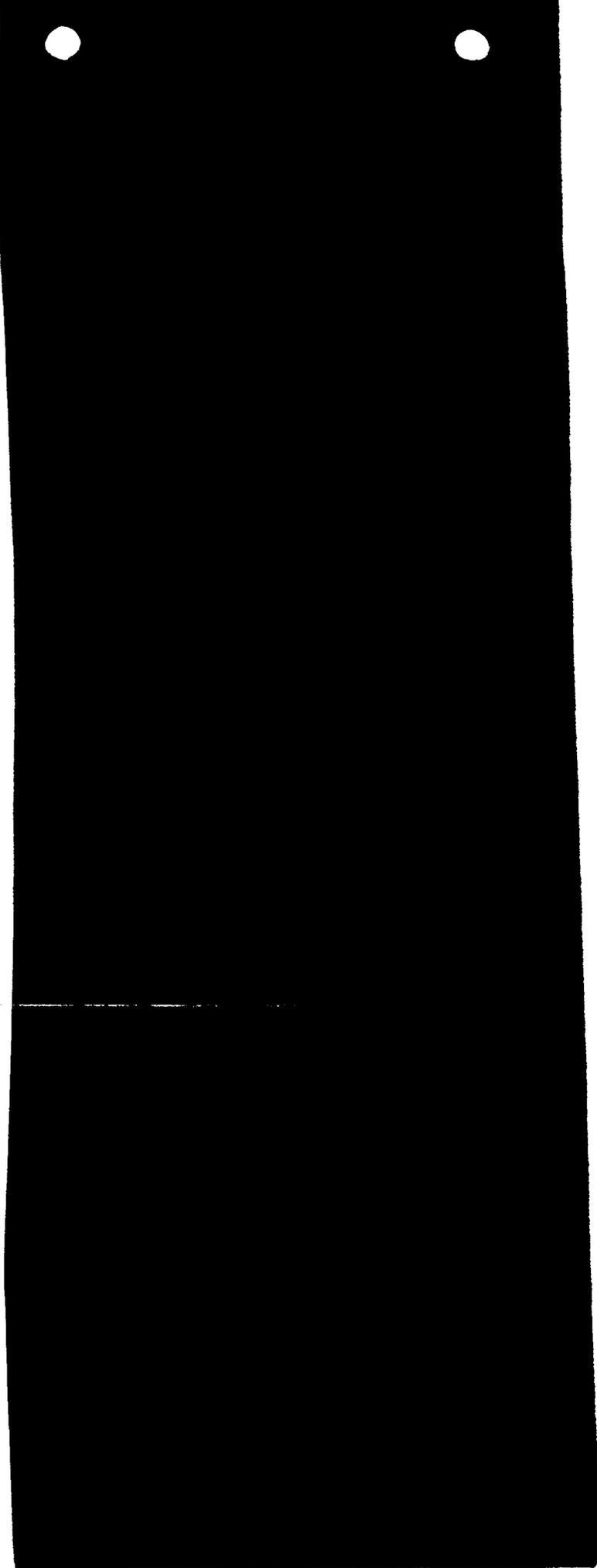
- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) ALL IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Wasidowski
(SIGNATURE AND TITLE OF RESPONDENT)

DISTRIBUTION:

White: Utility Complete and Return to Auditor
Pink: Audit File Copy
Canary: Utility Retain

FPL FiberNet LLC
Support for Response to Audit Document / Record Request
Request Dated 8/2/00 No. 4, ITEM No. 2



41-1

2-1

1
P. 1

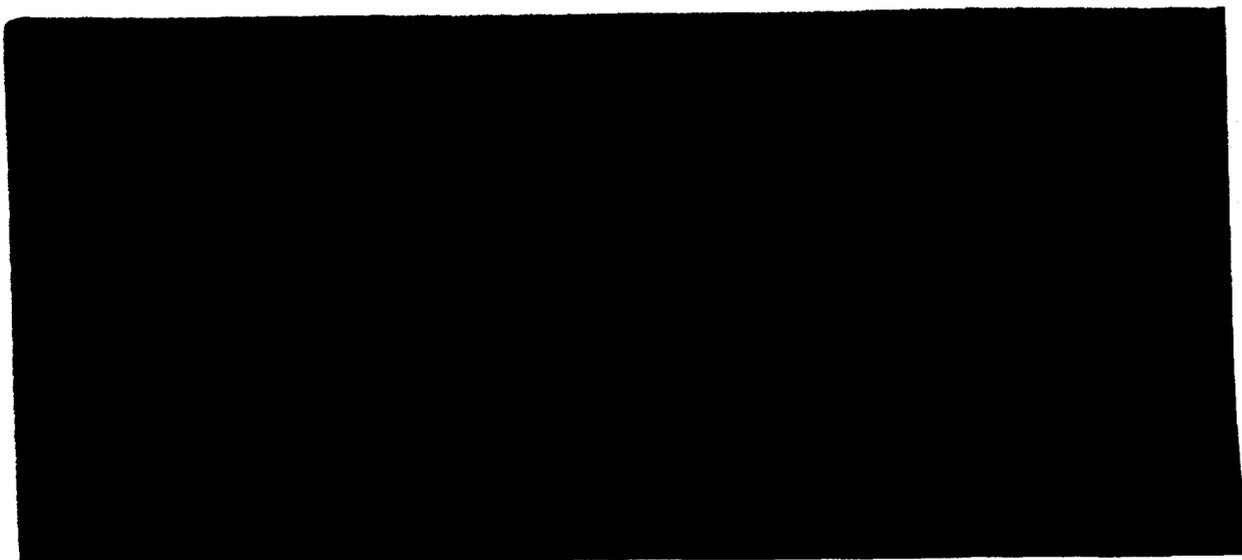
44-1
2-1
2

44-1
2-1
2

PHOTO REPRODUCTION - QUALITY OF ORIGINAL COPY IS POOR

41-1
2-1
2

FPL FiberNet LLC
Support for Response to Audit Document/Record Request
Request Dated 8/30/00, No. 8, Item No. 2



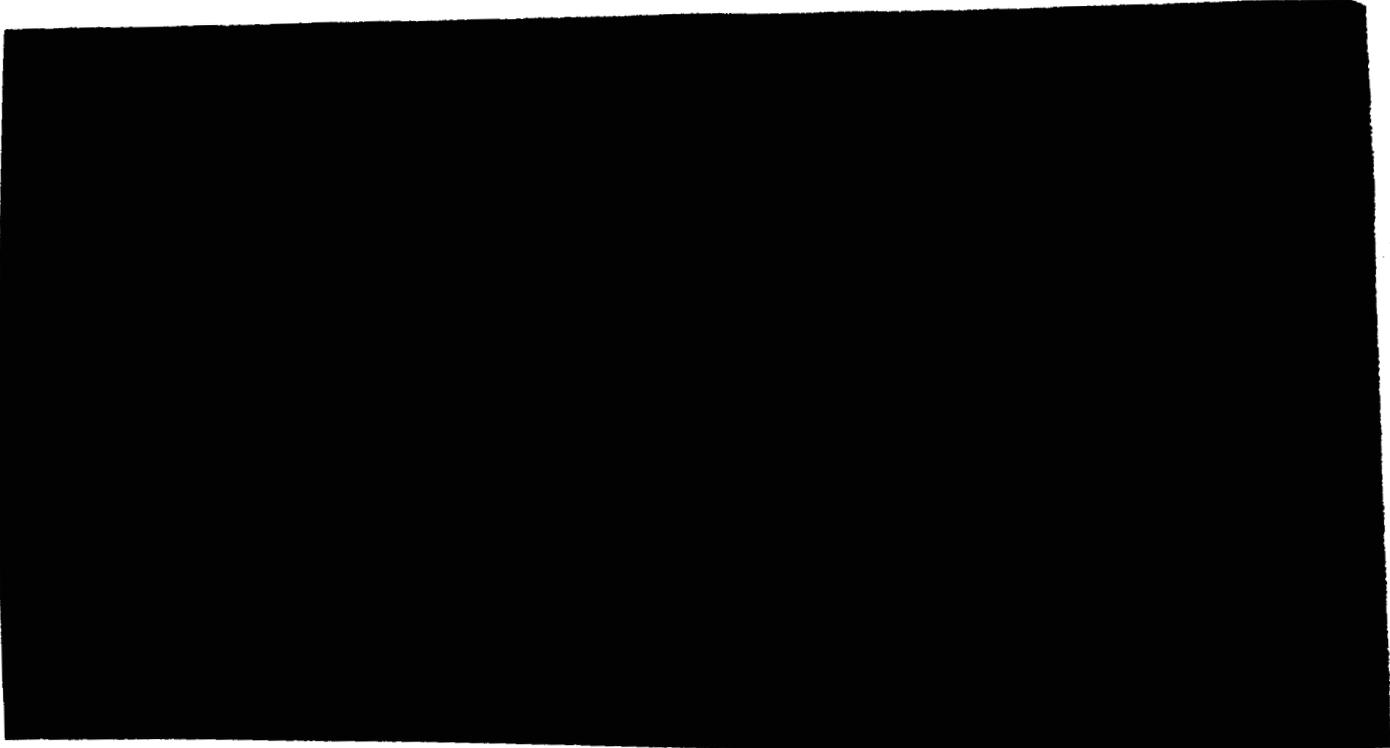
41-1
2-1
3

FPL FiberNet LLC
Support for Response to Audit Document/Record Request
Request Dated 8/29/00, No. 8, Item No. 2



41-1
2-1
3

FPL FiberNet LLC
Response to Audit Document / Record Request
Request Dated 8/24/00 *No. 5*



$\frac{41-1}{2-1}$
4

$$\begin{array}{r} 41-1 \\ \hline 2-1 \\ \hline 4 \end{array}$$

p. 2

$$\frac{41-1}{2-1}$$
$$4$$

p. 3

$$\begin{array}{r} 41-1 \\ \hline 2-1 \\ \hline 4 \end{array}$$

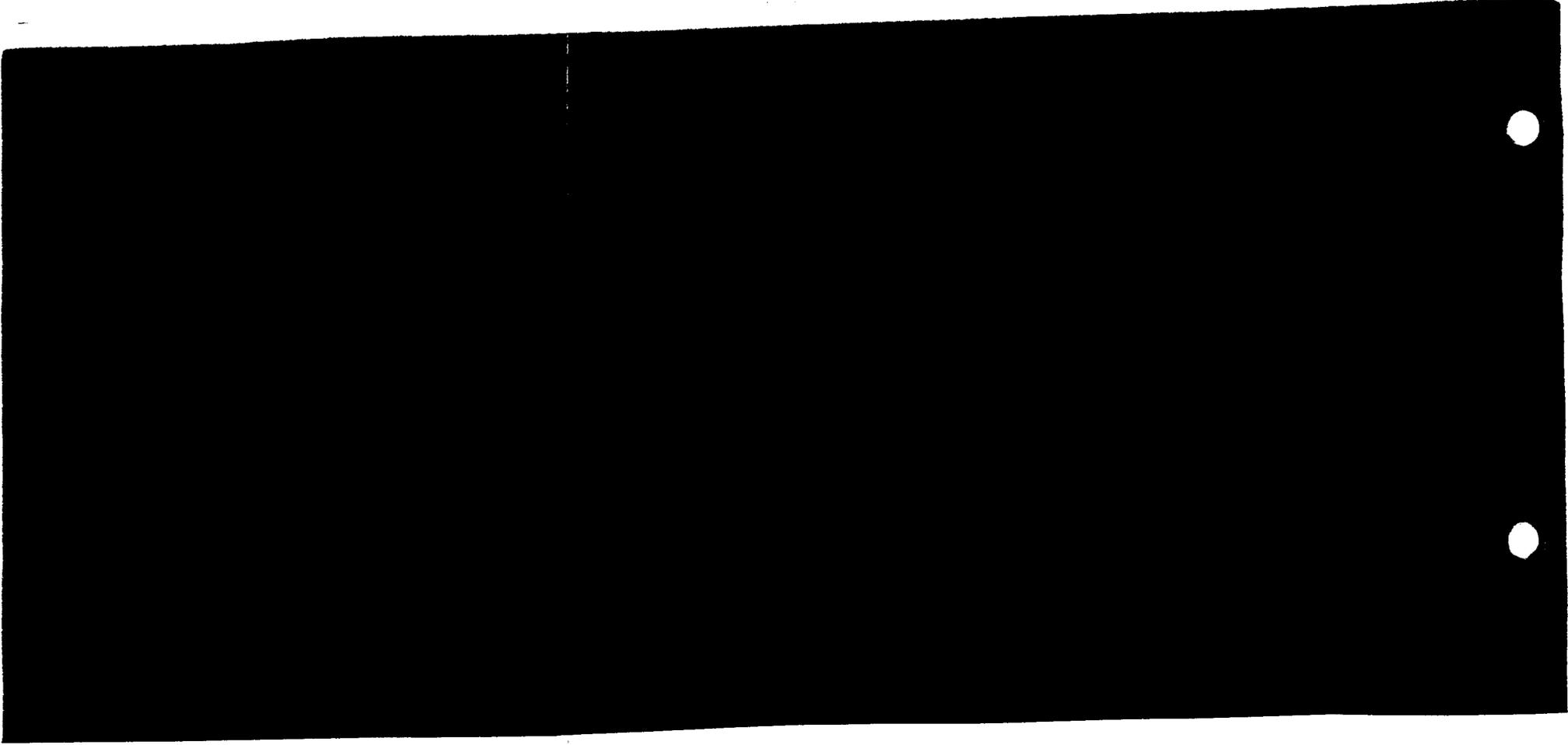
p. 4

FPL FiberNet LLC

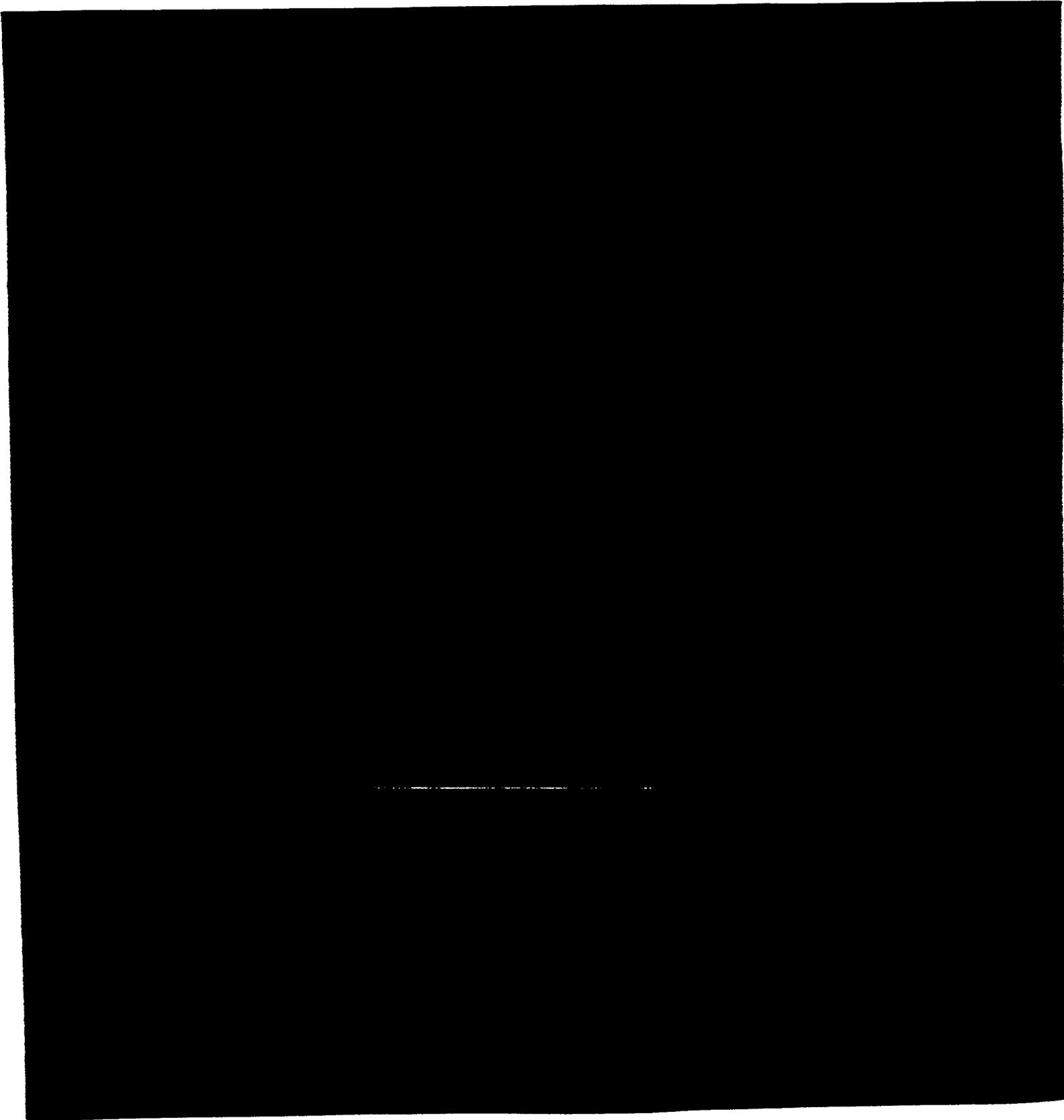
Support for Response to Audit Document / Record Request

Request Dated 8/2/00

No. 4, Item No. 1



41-1
2-1
5



$\frac{41-1}{21}$
6 P.1

DOCUMENT NAME: UNCLASSIFIED
*** FPL II/GL Balance Display ***
FPL FIBER NET

End Time: 16:43:34

Start Time: 16:43:34

TRANSACTION COMPLETE

Basic record:

Rec type: P Year: 2000 Ver: 00 Beg-Per: 01 End-Per: 01

You have selected the following ranges:

06 EAC FROM: 0966 TO: 0966 11

A

B

YTD Amount

Net Amount

$\frac{41-1}{2-1}$
 $\frac{2-1}{3}$

Seg (903/905) Read: 11
Master (G4000) Read: 11

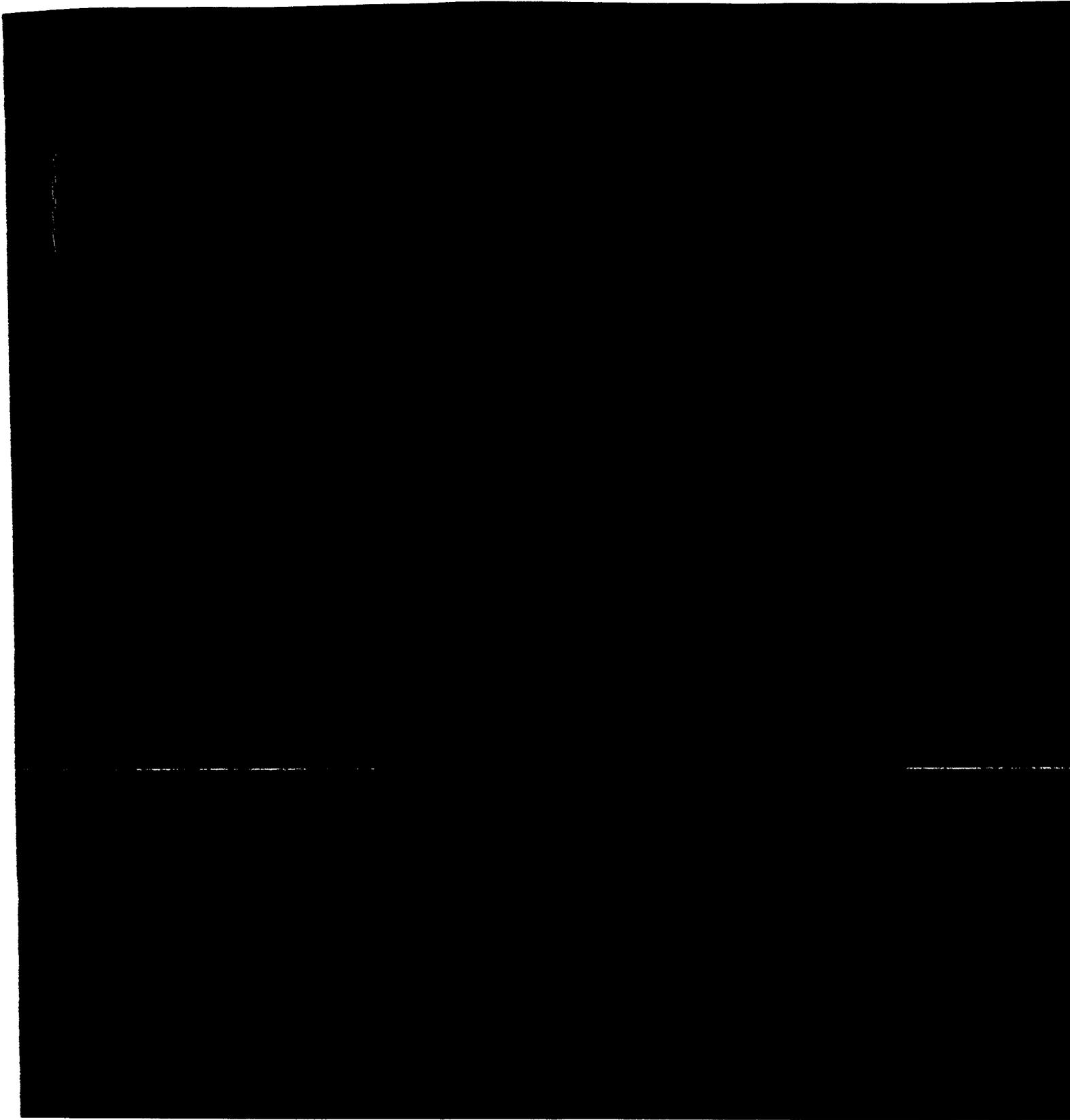
Not Rt, Yr, Ver, Bypassed:
Summary Records Bypassed:
Master Records Used: 11

*** Next Transaction *** 840

A Proprietary Product of Walker Interactive Products

$\frac{41-1}{2-1}$
 $\frac{2-1}{6}$

Date: 9/1/00 Time: 4:43:36 PM



$\frac{41-1}{2-1}$
 $\frac{6}{6}$

P. 3

*** FPL II/GL Balance Display ***
FPL FIBER NET

End Time: 16:43:43

Start Time: 16:43:43

TRANSACTION COMPLETE

Basic record:

Rec type: P Year: 2000 Ver: 00 Beg-Per: 02 End-Per: 02

You have selected the following ranges:

06 EAC

FROM: 0966

TO: 0966

11

A

B

YTD Amount

Net Amount

Seg (903/905) Read: 11
Master (G4000) Read: 11

Not Rt, Yr, Ver, Bypassed:
Summary Records Bypassed:
Master Records Used: 11

*** Next Transaction *** 840

A Proprietary Product of Walker Interactive Products

41-1
2-1
6

$\frac{41-1}{2-1}$
 $\frac{6}{6}$

P. 5

*** FPL II/GL Balance Display ***
FPL FIBER NET

End Time: 16:43:50

Start Time: 16:43:50

TRANSACTION COMPLETE

Basic record:

Rec type: P Year: 2000 Ver: 00 Beg-Per: 03 End-Per: 03

You have selected the following ranges:

06 EAC

FROM: 0966

TO: 0966

11

A

B

YTD Amount

[REDACTED]

Net Amount

[REDACTED]

41-1
2-1
3

Seg (903/905) Read: 11
Master (G4000) Read: 11

Not Rt, Yr, Ver, Bypassed:
Summary Records Bypassed:
Master Records Used: 11

*** Next Transaction *** 840

A Proprietary Product of Walker Interactive Products

41-1
2-1
6

$\frac{41-1}{2-1}$
 $\frac{6}{6}$

p. 7

*** FPL II/GL Balance Display ***
FPL FIBER NET

End Time: 16:43:57

Start Time: 16:43:56

TRANSACTION COMPLETE

Basic record:

Rec type: P Year: 2000 Ver: 00 Beg-Per: 04 End-Per: 04

You have selected the following ranges:

06 EAC FROM: 0966 TO: 0966 11

A

B

YTD Amount

[Redacted]

Net Amount

[Redacted]

41-1
2-1
3

Seg (903/905) Read: 11
Master (G4000) Read: 11

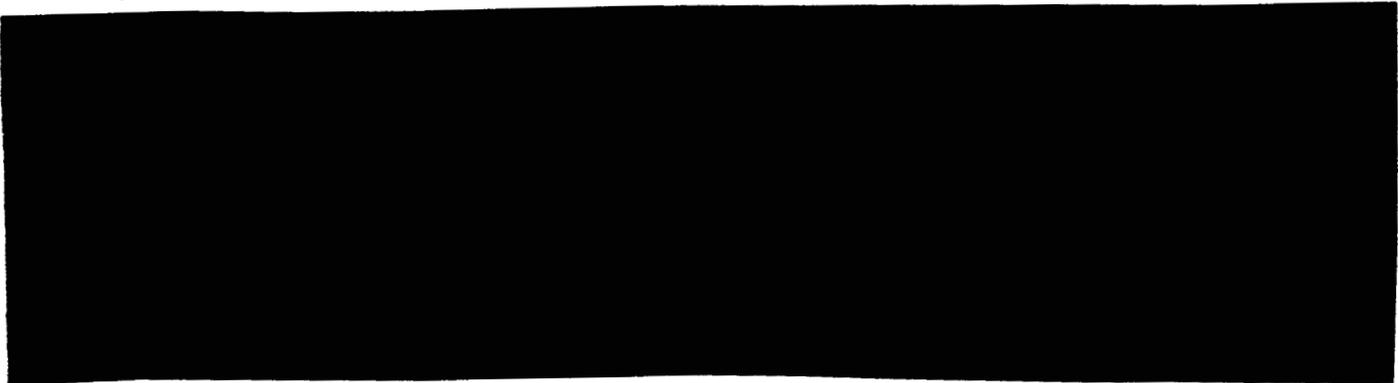
Not Rt, Yr, Ver, Bypassed:
Summary Records Bypassed:
Master Records Used: 11

*** Next Transaction *** 840

A Proprietary Product of Walker Interactive Products

41-1
2-1
6

FPL FiberNet LLC
Support for Response to Audit Document/Record Request
Request Dated 8/30/00, No. 8, Item No. 1



41-1
2-1
6-1



FPL Peter Clayton

04/06/2000 08:59 AM

[Redacted]

To: Tom Kelliher@FPL
cc: Sol Stamm@FPL, David Eckmann/IM/FPL@FPL, Joe Ferrel/IM/FPL@FPL, Don Babka@FPL, Winnie Lohmann@FPL
Subject: Fiber Revenues - March 2000

1	[Redacted]			
2	[Redacted]			
3	[Redacted]			
4	FPL Fiber Net Revenues			
5	A	B	C	D
6	[Redacted]	[Redacted]	[Redacted]	[Redacted]
7	[Redacted]	[Redacted]	[Redacted]	[Redacted]
8	[Redacted]	[Redacted]	[Redacted]	[Redacted]
9	[Redacted]	[Redacted]	[Redacted]	[Redacted]
10	[Redacted]	[Redacted]	[Redacted]	[Redacted]
11	[Redacted]	[Redacted]	[Redacted]	[Redacted]
12	[Redacted]	[Redacted]	[Redacted]	[Redacted]
13	[Redacted]	[Redacted]	[Redacted]	[Redacted]
14	[Redacted]	[Redacted]	[Redacted]	[Redacted]
15	[Redacted]	[Redacted]	[Redacted]	[Redacted]
16	A	B	C	D
17	[Redacted]	[Redacted]	[Redacted]	[Redacted]
18	[Redacted]	[Redacted]	[Redacted]	[Redacted]
19	[Redacted]	[Redacted]	[Redacted]	[Redacted]
20	[Redacted]	[Redacted]	[Redacted]	[Redacted]
21	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Forwarded by Peter Clayton on 04/06/2000 08:10 AM



FPL Peter Clayton

03/06/2000 10:22 AM

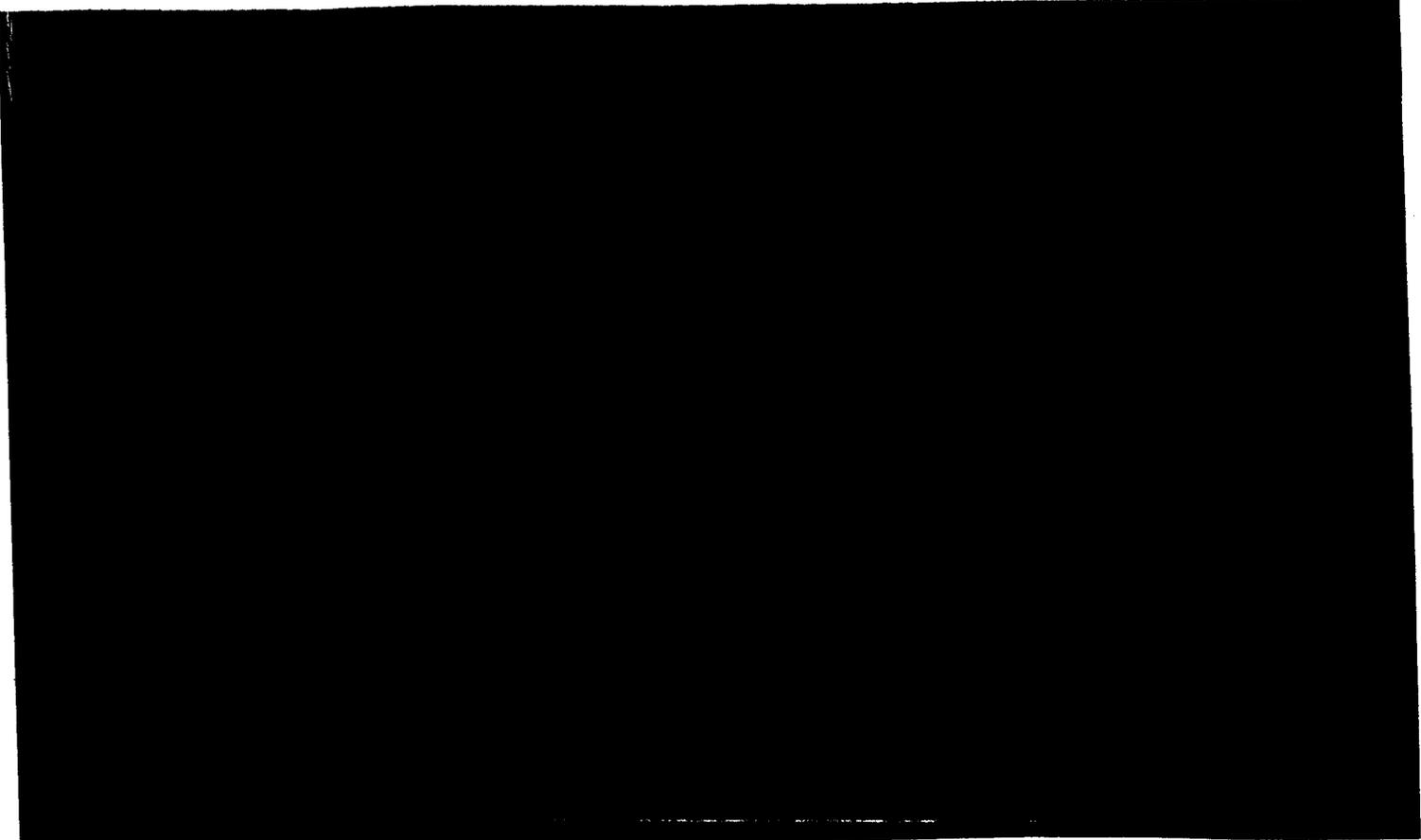
[Redacted]

To: Tom Kelliher@FPL

CONFIDENTIAL

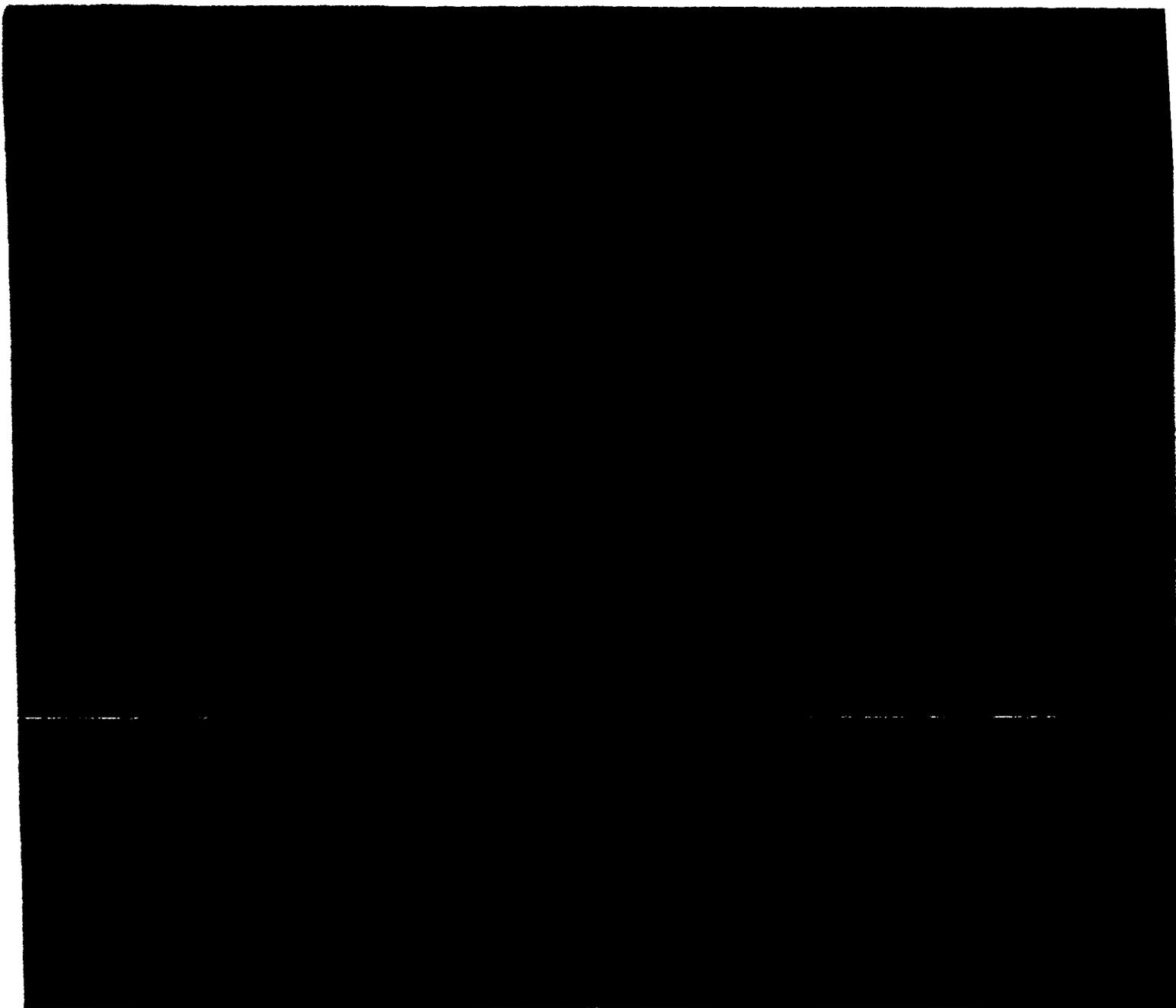
41-1
2-1
6-1

FPL FiberNet LLC
Support for Response to Audit Document / Record Request
Request Dated 8/2/00 No. 4, Item No. 3



41-1
2-2

FPL Fibernet LLC
Support for Response to Audit Document/Record Request
Request Dated 8/2/00 No. 4, Item No. 4



41-1
2-3

Exhibit C

Justification Table

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: Operating Revenues
AUDIT CONTROL NO: 00-222-4-1

FLORIDA
 STATUTE
 366.093(3)
 Subsection:

WKPAPER NO. DESCRIPTION NO. OF PAGES CONF. Y/N LINE NO./ COL. NO. AFFIANT

N/A	Audit Disclosure No. 1	1	N			
N/A	Audit Disclosure No. 2	1	N			
9	Internal Audit Report	1	Y	Lines 1-3	(b)	R. Del Cueto
		2	Y	Lines 1-32	(b)	
		3	Y	Lines 1-11	(b)	
			Y	Col A, lines 12-38	(b)	
			Y	Col B, lines 12-38	(b)	
			Y	Col C, lines 12-38	(b)	
		4	Y	Lines 1-2	(b)	
			Y	Col A, lines 3-24	(b)	
			Y	Col B, lines 3-24	(b)	
			Y	Col C, lines 3-24	(b)	
		5	Y	Lines 1-37	(b)	
		6	Y	Lines 1-38	(b)	
		7	Y	Lines 1-36	(b)	
		8	Y	Lines 1-35	(b)	
		9	Y	Lines 1-41	(b)	
		10	Y	Lines 1-37	(b)	
11	Y	Lines 1-32	(b)			
12	Y	Lines 1-32	(b)			
13	Y	Lines 1-22	(b)			
14	Y	Col A, Lines 3-23	(b)			
	Y	Col B, Lines 3-23	(b)			
	Y	Col C, Lines 3-23	(b)			
	Y	Col D, Lines 3-23	(b)			
	Y	Col E, Lines 3-23	(b)			
15	Y	Col A, Lines 2-18	(b)			
	Y	Col B, Lines 2-13	(b)			
	Y	Col C, Lines 2-7	(b)			
16	Y	Col A, Lines 2-50	(b)			

		2	Y	Col D, Lines 1-35	(d) (e)	
			Y	Col E, Lines 1-35	(d) (e)	
		3	Y	Col A, Line 1	(d) (e)	
			Y	Col B, Line 1	(d) (e)	
			Y	Col A, Lines 1-37	(d) (e)	
			Y	Col B, Lines 1-37	(d) (e)	
			Y	Col C, Lines 1-37	(d) (e)	
			Y	Col D, Lines 1-37	(d) (e)	
		4	Y	Col E, Lines 1-37	(d) (e)	
			Y	Col A, Line 1	(d) (e)	
		5	Y	Col B, Line 1	(d) (e)	
			Y	Col A, Lines 1-36	(d) (e)	
			Y	Col B, Lines 1-36	(d) (e)	
			Y	Col C, Lines 1-36	(d) (e)	
			Y	Col D, Lines 1-36	(d) (e)	
		6	Y	Col E, Lines 1-36	(d) (e)	
			Y	Col A, Line 1	(d) (e)	
		7	Y	Col B, Line 1	(d) (e)	
			Y	Col A, Lines 1-37	(d) (e)	
			Y	Col B, Lines 1-37	(d) (e)	
			Y	Col C, Lines 1-37	(d) (e)	
			Y	Col D, Lines 1-37	(d) (e)	
		8	Y	Col E, Lines 1-37	(d) (e)	
			Y	Col A, Line 1	(d) (e)	
			Y	Col B, Line 1	(d) (e)	
41-1/2-1/6-1	Income Statement Adjustment	1	Y	Lines 1 - 4	(d) (e)	S. Stamm
		2	Y	Col A, Lines 5-21	(d) (e)	
			Y	Col B, Lines 5-21	(d) (e)	
			Y	Col C, Lines 5-21	(d) (e)	
			Y	Col D, Lines 5-21	(d) (e)	
41-1/2-2	Pole Attachment Revenue	1	Y	Line 1	(d) (e)	S. Stamm
			Y	Col A, Lines 1-6	(d) (e)	
			Y	Col B, Lines 1-6	(d) (e)	
			Y	Col C, Lines 1-6	(d) (e)	
			Y	Col D, Lines 1-6	(d) (e)	
			Y	Lines 7 -11	(d) (e)	
41-1/2-3	Rent Revenue	1	Y	Lines 1 - 14	(d) (e)	S. Stamm

Exhibit D

AFFIDAVITS

EXHIBIT D

**BEFORE THE FLORIDA
PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's)
Request for Confidential Classification)
Of Material Provided pursuant to)
Audit No. 00-222-4-1)

Docket No: _____

Filed October 17, 2000

STATE OF FLORIDA)
)
MIAMI-DADE COUNTY)

AFFIDAVIT OF SOL STAMM

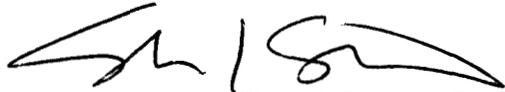
BEFORE ME, the undersigned authority, personally appeared Sol Stamm, who, being first duly sworn, deposes and says:

1. My name is Sol Stamm. I am currently employed by FPL FiberNet, LLC ("FiberNet") as 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. Documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information include FiberNet's financial projections, operating results, contract and pricing information, and cost data. In addition, the information includes detailed descriptions by location of FiberNet's telecommunications system and equipment that would tend to reveal FiberNet's system capabilities and/or deficiencies by location. This information, if made public, would afford FiberNet's competitors an unfair advantage over FiberNet and would impair FiberNet's efforts to enter into contracts on commercially favorable terms. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

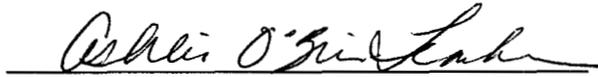
3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.



Sol Stamm

SWORN TO AND SUBSCRIBED before me this 16th day of October, 2000, by Sol Stamm, 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:



ASHLIE O'BRIEN LEMKE
COMMISSION # CC 659641
EXPIRES JUN 30, 2001
BONDED THRU
ATLANTIC BONDING CO., INC.

EXHIBIT D

**BEFORE THE FLORIDA
PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's)
Request for Confidential Classification)
Of Material Provided pursuant to)
Audit No. 00-222-4-1)

Docket No: _____

Filed October 17, 2000

STATE OF FLORIDA)
MIAMI-DADE COUNTY)

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 ("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. Documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information 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.

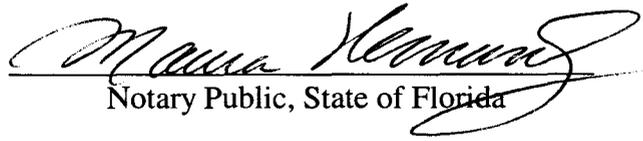
3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.



Rick Del Cueto

SWORN TO AND SUBSCRIBED before me this 10th day of October, 2000, 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 # CC913575 EXPIRES
May 25, 2004
BONDED THRU TROY FAIN INSURANCE, INC.