



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

**DATE:** August 6, 2001

**TO:** Division of Appeals (Brown)

**FROM:** Division of Regulatory Oversight (Freeman, Vandiver)  
 Division of Competitive Services (Makin)

**RE:** Docket 010534-EI, Recommendation concerning Florida Power & Light Company's (FPL's) request for confidential classification for a portion of the staff audit report and staff working papers obtained during the preparation of audit report numbered 00-353-4-1, FPL Natural Gas Audit for the year ended December 31, 2000, Documents Numbered 04265-01, 04266-01, 04267-01, 04268-01, 04269-01, 04270-01, 04806-01 and 07779-01

On March 29, 2001, when copies of certain portions of staff's audit report and staff working papers obtained or prepared during the FPL natural gas audit for the year ended December 31, 2000, were delivered to FPL at the audit exit conference, the utility requested that these materials be temporary excepted from public access in accordance with the provisions of Rule 25-22.006(3)(a)(2), Florida Administrative Code (FAC). On April 6, 2001, staff filed documents 04265-01, 04266-01, 04267-01, 04268-01, 04269-01, and 04270-01 consisting of those specified portions of the staff audit report and working papers,

On April 18, 2001, the utility filed a request pursuant to Rule 25-22.006, FAC, and Section 366.093, Florida Statutes (F.S.), that selected portions of the audit report and working papers prepared by staff during the audit receive confidential classification. The utility's request includes redacted copies for public inspection (Exhibit B, document 04805-01) and highlighted copies (document 04806-01).

On May 14, June 22, and July 20, 2001, FPL filed revisions to its request for confidential protection. The May 14 revision makes technical corrections improving the filing. The June 22 and July 20, revisions were made after discussions with the staff. The July 20 FPL filing provides the final listing of documents for which confidential classification is requested. The June 22 revision contains a revised highlighted page (Document 07779-01) as well as a revised redacted page (Document 07778-01).

Documents 04265-01, 04266-01, 04267-01, 04268-01, 04269-01, 04270-01, 04806-01, and 07779-01 are currently held by the Commission's Division of the Commission Clerk and Administrative Services as confidential pending resolution of FPL's request for confidential classification.

Pursuant to Section 119.07, F.S., documents submitted to this Commission are public records. The only exceptions to this law are specific statutory exemptions and exemptions granted by governmental agencies pursuant to the specific items of a statutory provision. Subsection 366.093(3)(d) provides the following exemptions:

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 FPSC - COMMISSION CLERK

"Proprietary confidential business information means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. Proprietary confidential business information includes but is not limited to:....

(b) Internal auditing controls and reports of internal auditors....

(d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods and services on favorable terms.

(e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information...."

According to Section 366.093, F.S., and Rule 25-22.006, FAC, the utility has the burden of demonstrating that materials qualify for confidential classification. According to rule 25-22.006, FAC, the utility must meet this burden by demonstrating that the information is proprietary confidential business information, the disclosure of which will cause the utility, the provider of the information or the ratepayer harm.

### **Staff Analysis of the Request**

Reading the FPL filing reveals the sensitive materials consist of:

1. Meeting and analytical notes obtained during the audit;
2. Materials used to summarize and review contracts;
3. Materials used to summarize vendor invoices and vendor invoice information;
4. Fuel inventory information;
5. Information concerning affiliate cost allocations and management fees;

**Staff Analysis of the Request** (continued)

6. Materials used to summarize and collect specific account information;
7. Employee information, time sheets and interview notes;

According to FPL the materials listed above report either sensitive contractual information, release of which could impair the ability of FPL and its Affiliates in purchasing natural gas, or competitively sensitive information release of which could harm the competitive business of FPL and its affiliates. Examination of the filing reveals much of the sensitive information in this filing is sensitive because of both its contractual and competitive impact.

The information "consists principally of natural gas purchasing practices and costs within FPL. Specifically, most of the information relates to the natural gas purchasing costs and practices of Energy Marketing and Trading, a division of FPL, on behalf of FPL, FPL Energy Services, Inc. ("FPLES") and FPL Energy, LLC ("FPL Energy"). Such information relates to competitive interests of FPL, FPLES and FPL Energy and/or concerns bids or other contractual data....For example, such information includes pricing models, customer purchase prices and usage, and non-tariffed commodity and transmission pricing...."

FPL has filed the affidavits of Paul Karns, Director of Contracts and Regulatory, FPL Energy Marketing and Trading Division, and James Gill, FPL Manager of Products and Services, who reviewed the material and recommend that the information remain confidential for at least 18 months.

8. Notes from review of internal audits, and;

FPL seeks confidential protection of information obtained from internal audits.

9. Materials used to collect customer bills and customer billing information.

During the ordinary course of the field work, staff auditors reviewed the bills of a number FPL electric customers who are also gas customers of the FPL affiliate and verified that no special discounts were awarded to the ratepayer. FPL seeks to keep this customer information confidential on the basis that (1) this information is not released by FPL to the public unless required by law or unless the customer authorizes the release of this information and (2) release of this customer-specific information would harm the customer.

**ISSUE:**

Staff agrees that release of the customer-specific information could be harmful to the electric ratepayer or to the electric ratepayer's business. Staff does not fully agree with the FPL statement that all important customer information has been closely held by FPL as described below.

Certain FPL employees were found to have charged time to the electric business and to the gas business. Similarly, while the audit makes no conclusion in this area, employees who staff FPL's gas business could be either intentionally or unintentionally selected or recruited based upon their knowledge of the company's customers in FPL's service territory. Certainly other unregulated gas companies could gain expertise by seeking out, recruiting and hiring experts in Florida energy markets, but those unregulated gas companies would not have access to "borrow" existing FPL employees.

Holding customer-specific information confidential should mean the unregulated gas affiliate of FPL be treated the same as any other person concerning the release of customer information. Furthermore because of FPL's power in the energy market, the company should be extremely vigilant in maintaining a structural separation between the company's unregulated gas enterprise and its electric energy business.

For these reasons we question, but do not render an opinion at this time, as to whether customer information was disclosed in this case. We believe that if information was disclosed, as stated, it was maintained as confidential within the FPL group of companies and was not intended to be released to the public.

Long-standing Commission policy has allowed non governmental customer-specific usage information to be granted a confidential classification (See Order 22851, dated April 23, 1990; Order 96-1478 dated December 4, 1996; Order 98-0421, dated March 24, 1998; Order 98-0620, dated May 4, 1998; and Order 00-1569, dated August 31, 2000) . Our recommendation is to hold this customer-specific information as confidential in this case, because release of the information was not at the direction of the utility customer, and the information has not been released to the general public.

**Duration of the Confidential Classification Period**

FPL requests that the material be granted confidential classification for at least 18 months. FPL goes on to request that this material be returned to the utility once this information is no longer needed for the Commission to conduct its business. According to the provisions of Section 366.093(4), F.S., absent good cause shown for a longer period of protection, a confidential classification is limited to 18 months. We therefore recommend that the period of classification be set as 18 months. As deemed necessary, the utility may request an extension of the confidential classification before the period tolls.

**Staff Recommendation**

Based upon reading the filing, and for the reasons presented above, we recommend the utility's request be granted and that the identified material be granted a confidential classification for 18 months.

**Closing the Docket**

The order resolving this request should include a provision that closes this docket once the time for appeal has expired.

A detailed recommendation regarding the material follows:

**Detailed Recommendation (as found)**

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04265-01, 04266-01, 04806-01 and 07779-01				
1	5	11-20,29,30	Grant	Sensitive competitive and contractual information
Documents 04265-01, 04266-01 and 04806-01				
1	7	All	Grant	Sensitive competitive and contractual information
Documents 04266-01 and 04806-01				
5	1-3	All	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04266-01 and 04806-01				
5-1	1-4	All	Grant	Sensitive competitive and contractual information
5-5/1	1	Lines 1-3, Cols A-D	Grant	Sensitive competitive and contractual information
5-5/2	1	Lines 1-3, Col A	Grant	Sensitive competitive and contractual information
5-5/3	1	1-9	Grant	Sensitive competitive and contractual information
5-6	1-2	All	Grant	Sensitive competitive and contractual information
9	1	All	Grant	Information from Internal audits
10-1/1	1-3	All	Grant	Sensitive competitive and contractual information
40	1	1-38	Grant	Sensitive competitive and contractual information
40-1	1	All	Grant	Sensitive competitive and contractual information
40-2	1	All	Grant	Sensitive contractual information
40-3/1	1	All	Grant	Sensitive competitive and contractual information
40-3/1-1	1	1-29	Grant	Sensitive competitive and contractual information
41	1-2	All	Grant	Sensitive competitive and contractual information
41-1	1	All	Grant	Sensitive contractual information
41-1/1	1	All	Grant	Sensitive contractual information
41-1/1-1	1	All	Grant	Sensitive contractual information
41-1/1-2	1-3	All	Grant	Sensitive contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04266-01 and 04806-01				
41-1/1-3	1-8	All	Grant	Sensitive contractual information
41-1/1-4	1-23	All	Grant	Sensitive contractual information
41-1/1-5	1-4	All	Grant	Sensitive contractual information
41-1/2	1	All	Grant	Sensitive contractual information
41-1/2-1	1	All	Grant	Sensitive competitive and contractual information
41-1/2-2	1-3	All	Grant	Sensitive competitive and contractual information
41-1/2-3	1-7	All	Grant	Sensitive contractual information
41-1/2-4	1-5	All	Grant	Sensitive competitive and contractual information
41-1/3	1-2	All	Grant	Sensitive competitive and contractual information
41-1/4	1	All	Grant	Sensitive competitive and contractual information
41-1/5	1	All	Grant	Sensitive competitive and contractual information
41-1/6	1	All	Grant	Sensitive competitive and contractual information
41-1/7	1	All	Grant	Sensitive competitive and contractual information
41-1/8	1	All	Grant	Sensitive competitive and contractual information
41-1/9	1-4	All	Grant	Sensitive competitive and contractual information
41-1/10	1-4	All	Grant	Sensitive competitive and contractual information
42	1	1-7	Grant	Sensitive contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04266-01 and 04806-01				
42-1	1-36	All	Grant	Sensitive contractual information
42-1/1	1	All	Grant	Sensitive contractual information
42-1/1-1	1-2	All	Grant	Sensitive contractual information
42-1/1-1/1	1	All	Grant	Sensitive competitive information
42-2	1-102	All	Grant	Sensitive contractual information
42-2/1	1-4	All	Grant	Sensitive competitive and contractual information
Documents 04267-01 and 04806-01				
43	1	1-3	Grant	Sensitive contractual information
43	2	1	Grant	Sensitive contractual information
43-1	1	All	Grant	Sensitive contractual information
43-1/1	1	All	Grant	Sensitive contractual information
43-1-1/1-1	1-3	All	Grant	Sensitive competitive and contractual information
43-1/1-2	1	All	Grant	Sensitive competitive and contractual information
43-1/1-3	1	All	Grant	Sensitive competitive and contractual information
43-1/1-4	1-3	All	Grant	Sensitive competitive and contractual information
43-1/1-5	1-2	All	Grant	Sensitive competitive and contractual information



Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04267-01 and 04806-01				
43-1/1-5/1	1-18	All	Grant	Sensitive competitive and contractual information
43-1/1-5/2	1	1-12	Grant	Sensitive competitive information
43-1/1-5/2-1	1-12	All	Grant	Sensitive competitive and contractual information
43-1/1-5/2-2	1-17	All	Grant	Sensitive competitive and contractual information
43-1/1-6	1-5	All	Grant	Sensitive competitive and contractual information
43-1/2	1	All	Grant	Sensitive competitive and contractual information
43-1/2-1	1-3	All	Grant	Sensitive competitive and contractual information
43-1/2-2	1	All	Grant	Sensitive competitive and contractual information
43-1/2-3	1	All	Grant	Sensitive competitive and contractual information
43-1/2-4	1	All	Grant	Sensitive competitive and contractual information
43-1/2-4/1	1-5	All	Grant	Sensitive competitive and contractual information
43-1/2-4/2	1	All	Grant	Sensitive competitive and contractual information
43-1/2-5	1-5	All	Grant	Sensitive competitive and contractual information
43-2	1	All	Grant	Sensitive contractual information
43-2/1	1-2	All	Grant	Sensitive contractual information
43-2/2	1-2	All	Grant	Sensitive contractual information
43-3	1	All	Grant	Sensitive contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04267-01 and 04806-01				
43-3/1	1-3	All	Grant	Sensitive contractual information
43-4	1	All	Grant	Sensitive contractual information
43-4/1	1-3	All	Grant	Sensitive contractual information
43-5	1	All	Grant	Sensitive competitive and contractual information
43-5/1	1	All	Grant	Sensitive competitive and contractual information
43-5/2	1-2	All	Grant	Sensitive competitive and contractual information
43-5/3	1	All	Grant	Sensitive contractual information
43-5/4	1	All	Grant	Sensitive competitive and contractual information
43-5/5	1	All	Grant	Sensitive contractual information
43-6	1	All	Grant	Sensitive contractual information
43-6/1	1	All	Grant	Sensitive contractual information
43-6/2	1-2	All	Grant	Sensitive contractual information
43-6/3	1	All	Grant	Sensitive competitive and contractual information
43-6/4	1	All	Grant	Sensitive contractual information
43-6/5	1	All	Grant	Sensitive contractual information
43-7	1-6	All	Grant	Sensitive contractual information
Documents 04268-01 and 04806-01				
44	1	1-11	Grant	Sensitive competitive information
44	2	All	Grant	Sensitive competitive information
44B	1-4	All	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04268-01 and 04806-01				
44-1	1-14	All	Grant	Sensitive competitive and contractual information
44-1A	1	1	Grant	Sensitive contractual information
44-1/1	1-10	All	Grant	Sensitive contractual information
44-1/1-1	1-10	All	Grant	Sensitive contractual information
44-1/1-2	1	All	Grant	Sensitive competitive and contractual information
44-1/1-3	1-4	All	Grant	Sensitive competitive and contractual information
44-1/1-4	1	All	Grant	Sensitive competitive and contractual information
44-1/1-5	1-3	All	Grant	Sensitive competitive and contractual information
44-1/1-6	1-3	All	Grant	Sensitive competitive and contractual information
44-1/1-7	1	All	Grant	Sensitive competitive and contractual information
44-1/1-8	1	All	Grant	Sensitive competitive and contractual information
44-1/1-9	1-3	All	Grant	Sensitive competitive and contractual information
44-1/2	1-2	All	Grant	Sensitive competitive and contractual information
44-1/2-1	1	All	Grant	Sensitive competitive and contractual information
44-1/2-1/1	1	All	Grant	Sensitive competitive and contractual information
44-1/2-1/1-1	1	All	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04268-01 and 04806-01				
44-1/2-1/1-1/1	1	All	Grant	Sensitive competitive and contractual information
44-1/2-1/1-2	1	All	Grant	Sensitive competitive and contractual information
44-1/2-1/1-3	1-2	All	Grant	Sensitive contractual information
44-1/2-1/1-4	1-10	All	Grant	Sensitive competitive and contractual information
44-1/2-1/2	1	All	Grant	Sensitive contractual information
44-1/3	1-9	All	Grant	Sensitive contractual information
44-1/3-1	1	All	Grant	Sensitive competitive and contractual information
44-1/3-2	1	All	Grant	Sensitive competitive and contractual information
44-1/3-3	1-2	All	Grant	Sensitive competitive and contractual information
44-1/3-4	1-2	All	Grant	Sensitive competitive and contractual information
44-1/3-5	1-10	All	Grant	Sensitive contractual information
45-2	1	All	Grant	Sensitive competitive and contractual information
45-4	1-2	All	Grant	Sensitive competitive and contractual information
46-1	1	All	Grant	Sensitive competitive information
46-1/1	1	All	Grant	Sensitive competitive information
46-3	1	1-12	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04269-01 and 04806-01				
47	1	1-13	Grant	Sensitive competitive and contractual information
47	2	1-3	Grant	Sensitive competitive and contractual information
47-3	1	All	Grant	Sensitive competitive and contractual information
47-5	1	All	Grant	Sensitive competitive and contractual information
47-5/1	1	All	Grant	Sensitive competitive and contractual information
48	1-2	All	Grant	Sensitive competitive and contractual information
48-1	1	All	Grant	Sensitive competitive and contractual information
48-2	1	All	Grant	Sensitive competitive and contractual information
48-3	1	1	Grant	Sensitive competitive and contractual information
49	1	1-27	Grant	Sensitive competitive and contractual information
49	2	1-28	Grant	Sensitive competitive and contractual information
49	3	1-7	Grant	Sensitive competitive and contractual information
49-1	1	1-11	Grant	Sensitive competitive and contractual information
49-2	1	All	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04269-01 and 04806-01				
49-2/1	1	1-5	Grant	Sensitive competitive and contractual information
49-3	1	1-12	Grant	Sensitive competitive and contractual information
49-3/1	1-6	All	Grant	Sensitive competitive and contractual information
49-3/1-1	1	All	Grant	Sensitive competitive and contractual information
49-3/1-2	1	1-4	Grant	Sensitive competitive and contractual information
49-3/1-2	2-6	All	Grant	Sensitive competitive and contractual information
49-4	1	All	Grant	Sensitive competitive and contractual information
49-4/1	1	All	Grant	Sensitive competitive and contractual information
50	2	1-2	Grant	Sensitive competitive and contractual information
50-1	1-9	All	Grant	Sensitive competitive and contractual information
50-2	1-8	All	Grant	Sensitive competitive and contractual information
50-2/1	1	1-8	Grant	Sensitive competitive and contractual information
50-3	1-3	All	Grant	Sensitive competitive and contractual information
50-4	1	1-3	Grant	Sensitive competitive and contractual information
50-4	2	1-2	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04269-01 and 04806-01				
50-4/1	1-2	All	Grant	Sensitive competitive and contractual information
50-6	2-13	All	Grant	Sensitive competitive and contractual information
Documents 04270-01 and 04806-01				
51	1	1-6	Grant	Sensitive competitive and contractual information
51-1	1	1-5	Grant	Sensitive competitive and contractual information
51-1	2	1-2	Grant	Sensitive competitive and contractual information
52	1	1-4	Grant	Sensitive competitive and contractual information
52-1/1	1	All	Grant	Sensitive competitive and contractual information
52-3	1	1-13	Grant	Sensitive competitive and contractual information
52-3	2	1-14	Grant	Sensitive competitive and contractual information
52-3	5	1-18	Grant	Sensitive competitive and contractual information
52-3	6	1-10	Grant	Sensitive competitive and contractual information
52-4	1	1-14	Grant	Sensitive competitive and contractual information
52-4	2	1-16	Grant	Sensitive competitive and contractual information
52-4	3	1-14	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04270-01 and 04806-01				
52-4	4	1-6	Grant	Sensitive competitive and contractual information
52-4/1	1	Col A-C, Lines 1-4	Grant	Sensitive competitive and contractual information
52-5	1	1-10	Grant	Sensitive competitive and contractual information
52-5	2	1-9	Grant	Sensitive competitive and contractual information
52-5	3	1-9 and Col A-B	Grant	Sensitive competitive and contractual information
52-5	4	1-8	Grant	Sensitive competitive and contractual information
52-6	1	1-20 and Col A	Grant	Sensitive competitive and contractual information
52-6	2	1-22	Grant	Sensitive competitive and contractual information
52-6	3	1-27 and Col A-B	Grant	Sensitive competitive and contractual information
52-6	4	1-7 and Col A-C	Grant	Sensitive competitive and contractual information
52-6/1	1	1-7	Grant	Sensitive competitive and contractual information
52-6/1	2-3	All	Grant	Sensitive competitive and contractual information
52-7	1	1-13 and Col A	Grant	Sensitive competitive and contractual information
52-7	2	1-9	Grant	Sensitive competitive and contractual information
52-7	3	1-12	Grant	Sensitive competitive and contractual information



Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04270-01 and 04806-01				
52-7	4	1-11	Grant	Sensitive competitive and contractual information
52-7/1	1	1-6	Grant	Sensitive competitive and contractual information
52-8	1	1-5 and Col A	Grant	Sensitive competitive and contractual information
52-8	2	1-11 and Col A	Grant	Sensitive competitive and contractual information
52-8	3	1-9 and Col A	Grant	Sensitive competitive and contractual information
52-8	4	1-5	Grant	Sensitive competitive and contractual information
52-9	1	1-7 and Col A	Grant	Sensitive competitive and contractual information
52-9	2	1-7	Grant	Sensitive competitive and contractual information
52-9	3	1-14 and Col A	Grant	Sensitive competitive and contractual information
52-9	4	1-4	Grant	Sensitive competitive and contractual information
52-10	1	1-8 and Col A-B	Grant	Sensitive competitive and contractual information
52-10	2	1-8	Grant	Sensitive competitive and contractual information
52-10	3	1-13 and Col A	Grant	Sensitive competitive and contractual information
52-10	4	1-5	Grant	Sensitive competitive and contractual information
52-11	1	1-17 and Col A	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04270-01 and 04806-01				
52-11	2	1-7	Grant	Sensitive competitive and contractual information
52-11	3	1-22 and Col A	Grant	Sensitive competitive and contractual information
52-11	4	1-8	Grant	Sensitive competitive and contractual information
52-12	1	1-6 and Col A	Grant	Sensitive competitive and contractual information
52-12	2	1-5	Grant	Sensitive competitive and contractual information
52-12	3	1-8 and Col A	Grant	Sensitive competitive and contractual information
52-12	4	1-5	Grant	Sensitive competitive and contractual information
52-13	1	1-7 and Col A	Grant	Sensitive competitive and contractual information
52-13	2	1-9	Grant	Sensitive competitive and contractual information
52-13	3	1-18 and Col A	Grant	Sensitive competitive and contractual information
52-13	4	1-3	Grant	Sensitive competitive and contractual information
52-14	1	1-2 and Col A	Grant	Sensitive competitive and contractual information
52-15	1	1-14	Grant	Sensitive competitive and contractual information
52-15	2	1-8	Grant	Sensitive competitive and contractual information
52-15	3	1-23	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04270-01 and 04806-01				
52-15	4	1-9	Grant	Sensitive competitive and contractual information
52-16	1	1-12 and Col A-D	Grant	Sensitive competitive and contractual information
52-16	2	1-10	Grant	Sensitive competitive and contractual information
52-16	3	1-11	Grant	Sensitive competitive and contractual information
52-16	4	1-10	Grant	Sensitive competitive and contractual information
52-17	1	1-10 and Col A-C	Grant	Sensitive competitive and contractual information
52-17	2	1-7 and Col A-C	Grant	Sensitive competitive and contractual information
52-17	3	1-14	Grant	Sensitive competitive and contractual information
52-17	4	1-11	Grant	Sensitive competitive and contractual information
52-17/1	1	All	Grant	Sensitive competitive and contractual information
52-17/2	1-2	All	Grant	Sensitive competitive and contractual information
52-17/3	1-5	All	Grant	Sensitive competitive and contractual information
52-17/4	1-4	All	Grant	Sensitive competitive and contractual information
52-17/5	1-6	All	Grant	Sensitive competitive and contractual information
52-18	1	1-17	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04270-01 and 04806-01				
52-18	2	1-4	Grant	Sensitive competitive and contractual information
52-18	3	1-15	Grant	Sensitive competitive and contractual information
52-18	4	1-5	Grant	Sensitive competitive and contractual information
52-19	1	1-13	Grant	Sensitive competitive and contractual information
52-19	2	1-7, Col A	Grant	Sensitive competitive and contractual information
52-19	3	1-15	Grant	Sensitive competitive and contractual information
52-19	4	1-5	Grant	Sensitive competitive and contractual information
52-19/1	1	1-11, Col A-C	Grant	Sensitive competitive and contractual information
52-20	1	1-8, Col A	Grant	Sensitive competitive and contractual information
52-20	2	1-7	Grant	Sensitive competitive and contractual information
52-20	3	1	Grant	Sensitive competitive and contractual information
52-20	4-5	1-4	Grant	Sensitive competitive and contractual information
52-22	1	1-10, Col A	Grant	Sensitive competitive and contractual information
52-22/1	1	1-2, Col A	Grant	Sensitive contractual information
52-22/2	1	1-3	Grant	Sensitive contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04270-01 and 04806-01				
52-22/2-2	1-3	All	Grant	Sensitive competitive and contractual information
52-22/2-3	1	All	Grant	Sensitive competitive and contractual information
52-22/2-4	1-4	All	Grant	Sensitive competitive and contractual information
52-22/4	1	All	Grant	Sensitive competitive and contractual information
52-22/4-1	1-16	All	Grant	Sensitive competitive and contractual information
52-22/4-2	1-15	All	Grant	Sensitive competitive and contractual information
52-22/4-3	1-16	All	Grant	Sensitive competitive and contractual information
52-23	1	1-5	Grant	Sensitive competitive information
52-23/1	1	All	Grant	Sensitive competitive and contractual information
52-23/2	1	All	Grant	Sensitive competitive and contractual information
52-23/3	1	All	Grant	Sensitive competitive and contractual information
52-23/4	1	1-15	Grant	Sensitive competitive and contractual information
52-24	1	1-17	Grant	Sensitive competitive and contractual information
52-25	1	1-13	Grant	Sensitive competitive and contractual information
52-25/1	1	Col A-K	Grant	Sensitive competitive and contractual information

Staff Work Paper Number	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 04270-01 and 04806-01				
52-26	1	All	Grant	Sensitive competitive and contractual information
52-26/1	1-2	All	Grant	Sensitive competitive and contractual information
52-27	1	All	Grant	Sensitive competitive and contractual information
52-27/1	1	All	Grant	Sensitive competitive and contractual information

A temporary copy of this recommendation will be held at I:04806-01.RAF for a short period.

CC: Division of Regulatory Oversight (Welch)  
 Division of Commission Clerk and Administrative Services (Flynn)