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COMMISSION
CLERK

October 29, 2001

VIA HAND DELIVERY

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

011403-EI

**Re: Florida Power & Light Company's Request for Confidential Classification of
Material Provided pursuant to Audit No. 01-073-4-1**

Dear Ms. Bayó:

I enclose and hand you herewith for filing in the above-referenced matter, the original and two (2) copies of Florida Power & Light Company's ("FPL") Request for Confidential Classification in connection with Audit No. 01-073-4-1. The original includes Exhibits A, B, C and D. The two copies include only Exhibits B, C, and D.

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

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

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

13655 OCT 29 01

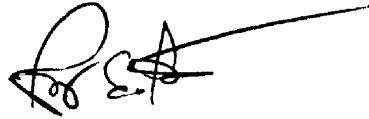
Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
October 29, 2001
Page 2

Finally, enclosed is an additional copy of FPL's Request for Confidential Classification.
Please stamp file this additional copy and return to FPL at your convenience.

Please do not hesitate to me at (305) 552-4657 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. Stone', with a long horizontal line extending to the right.

Robert E. Stone
Attorney

RES/sm

Enclosures

EXHIBIT A - CONFIDENTIAL

OCTOBER 2001

EXHIBIT B – REDACTED

(Edited)

OCTOBER 2001

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COMMISSION
CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's)
Request for Confidential Classification)
Of Material Provided pursuant to)
Audit Control No. 01-073-4-1

DOCKET No. 011403-EI
FILED: October 29, 2001

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF MATERIALS
PURSUANT TO AUDIT NO. 01-073-4-1**

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 Audit Control No. 01-073-4-1 (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

Robert E. Stone
Florida Power & Light Company
Attorney
P.O. Box 029100 LAW/GO
Miami, Florida 33102-9100
Tel. (305) 552-4657
Fax (305) 552-4153

DOCUMENT NUMBER - DATE

13655 OCT 29 01

FPSC-COMMISSION CLERK

2. During the Audit, Staff requested access to various FPL reports and other documents. By letter dated October 10, 2001, 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 31, 2001, within which to file a formal Request for Confidential Classification with respect to such workpapers. FPL hereby makes such request.

3. The following exhibits are included herewith and made a part hereof:

a. Composite Exhibit A consists of all documents for which FPL seeks confidential treatment, whether in whole or in part. All information in Exhibit A that FPL asserts is entitled to confidential treatment has been highlighted. Composite Exhibit A is submitted separately in a sealed folder or carton marked "CONFIDENTIAL."

b. Composite Exhibit B consists of edited versions of all documents for which FPL seeks confidential treatment. All information FPL asserts is entitled to confidential treatment has been blocked out in Composite Exhibit B.

c. Exhibit C is a table containing a line-by-line and page-by-page identification of the information for which confidential treatment is sought, and, with regard to each document or portions thereof, references to the specific statutory basis or bases for the claim of confidentiality and to the affidavits in support of the requested classification. Exhibit C is sometimes referred to hereinafter as the "Justification Table."

d. Exhibit D includes the affidavits of Rick Del Cueto and Dennis P. Coyle.

4. FPL seeks confidential protection for the information highlighted in Exhibit A.

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

5. FPL submits that the information in Exhibit A is proprietary confidential business information within the meaning of section 366.093(3). Except for the highlighted information in Workpaper 8-1 and as indicated in the affidavit of Rick Del Cueto, all of the other highlighted information in Exhibit A includes information that contains or constitutes internal audit controls or reports or information relating to same. Such information is entitled to protection under section 366.093(3)(b). Additionally, as the affidavit of Dennis P. Coyle indicates, the highlighted information in Workpaper 8-1 referenced in Exhibit A contains or constitutes information relating to the competitive interests of FPL's parent, FPL Group, Inc. and its affiliate FPL Energy, LLC, the disclosure of which would tend to reveal to competitors the corporate strategy of FPL Group, Inc., as well as providing notice of the existence or details of transactions then being considered, which information was not previously made public and would be subject to confidentiality agreements. Disclosure of such information would also impair the competitive business of FPL Group, Inc. and FPL Energy, LLC.

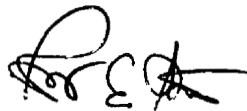
6. The material in Exhibit A for which FPL seeks confidential classification is

intended to be and is treated by FPL as private and has not been disclosed.

7. Upon a finding by the Commission that the material in Exhibit A for which FPL seeks confidential treatment is proprietary confidential business information within the meaning of section 366.093(3), pursuant to section 366.093(4) such materials should not be declassified for 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,



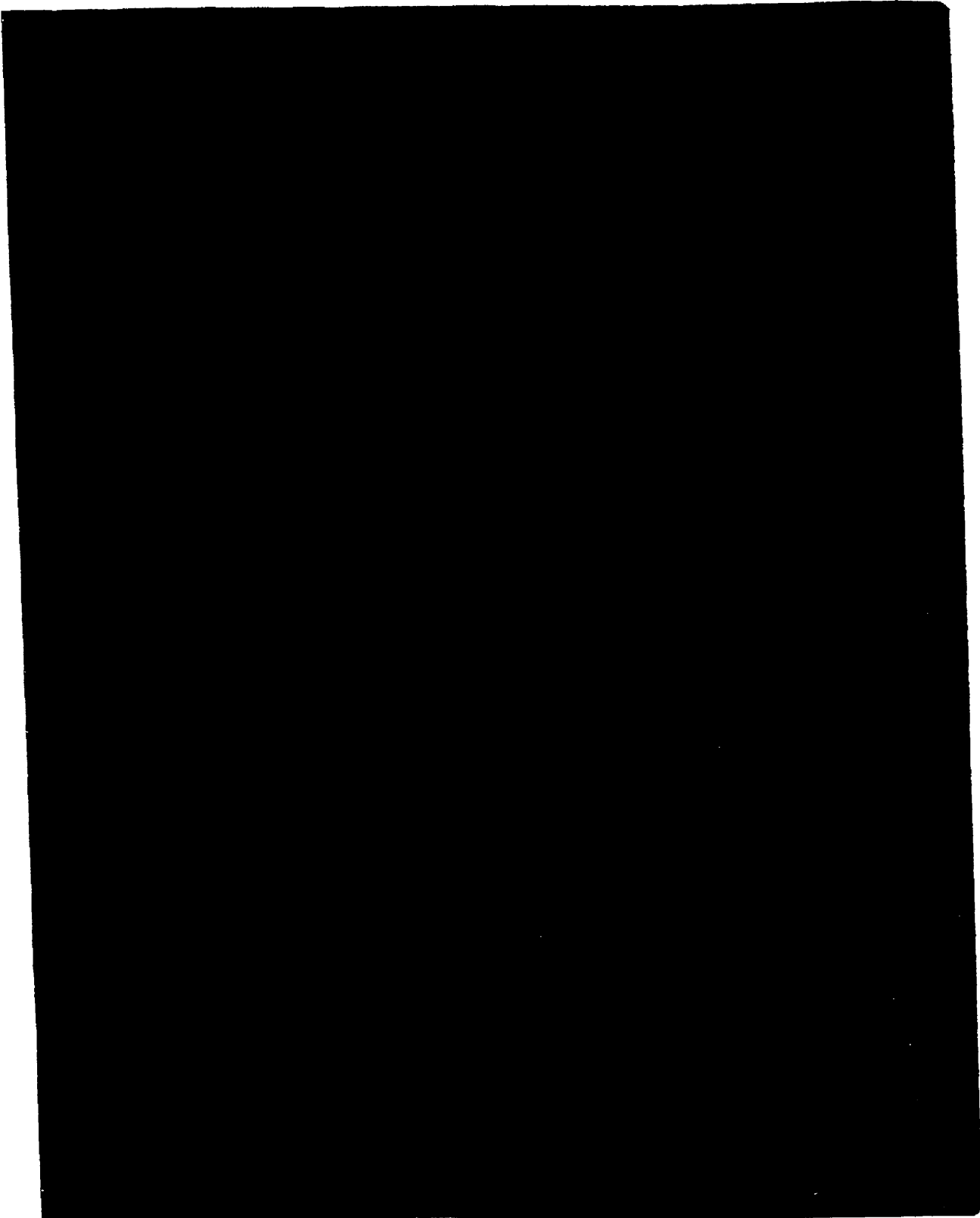
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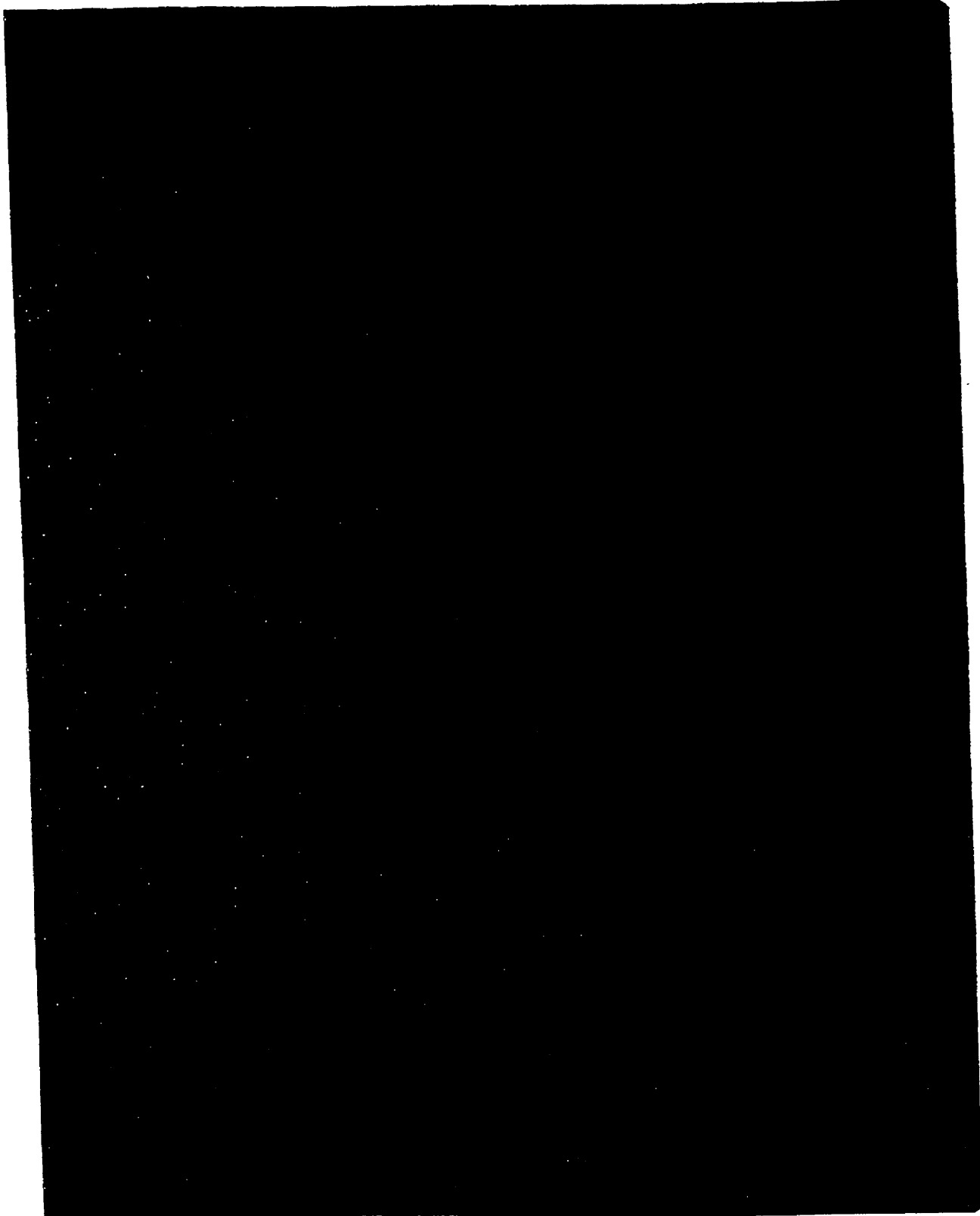
Robert E. Stone
Attorney for Florida Power & Light Company
P.O. Box 029100 LAW/GO
Miami, Florida 33102-9100
Tel. (305) 552-4657
Fax (305) 552-4153

FPL Group Inc
Minutes of Board of Directors

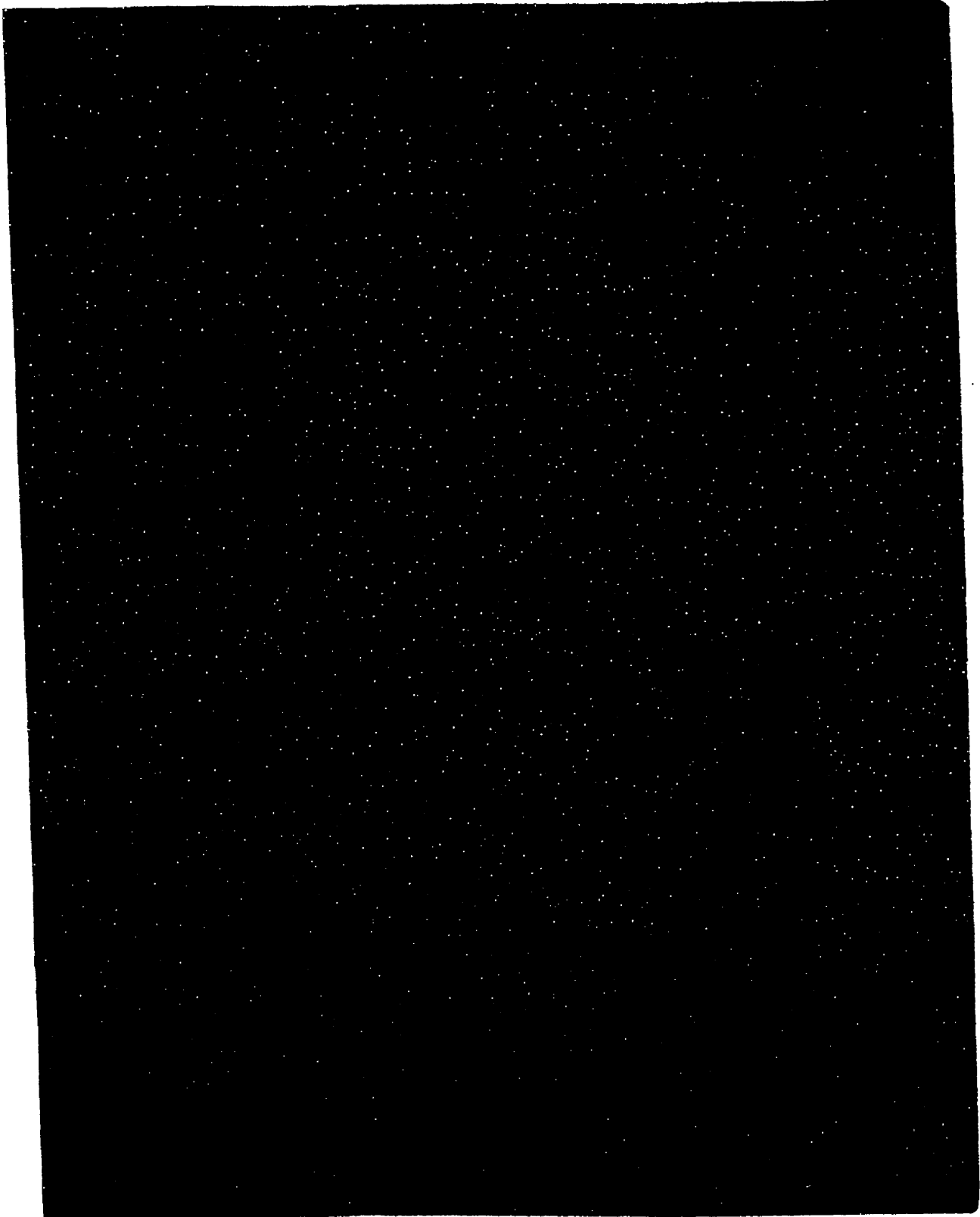
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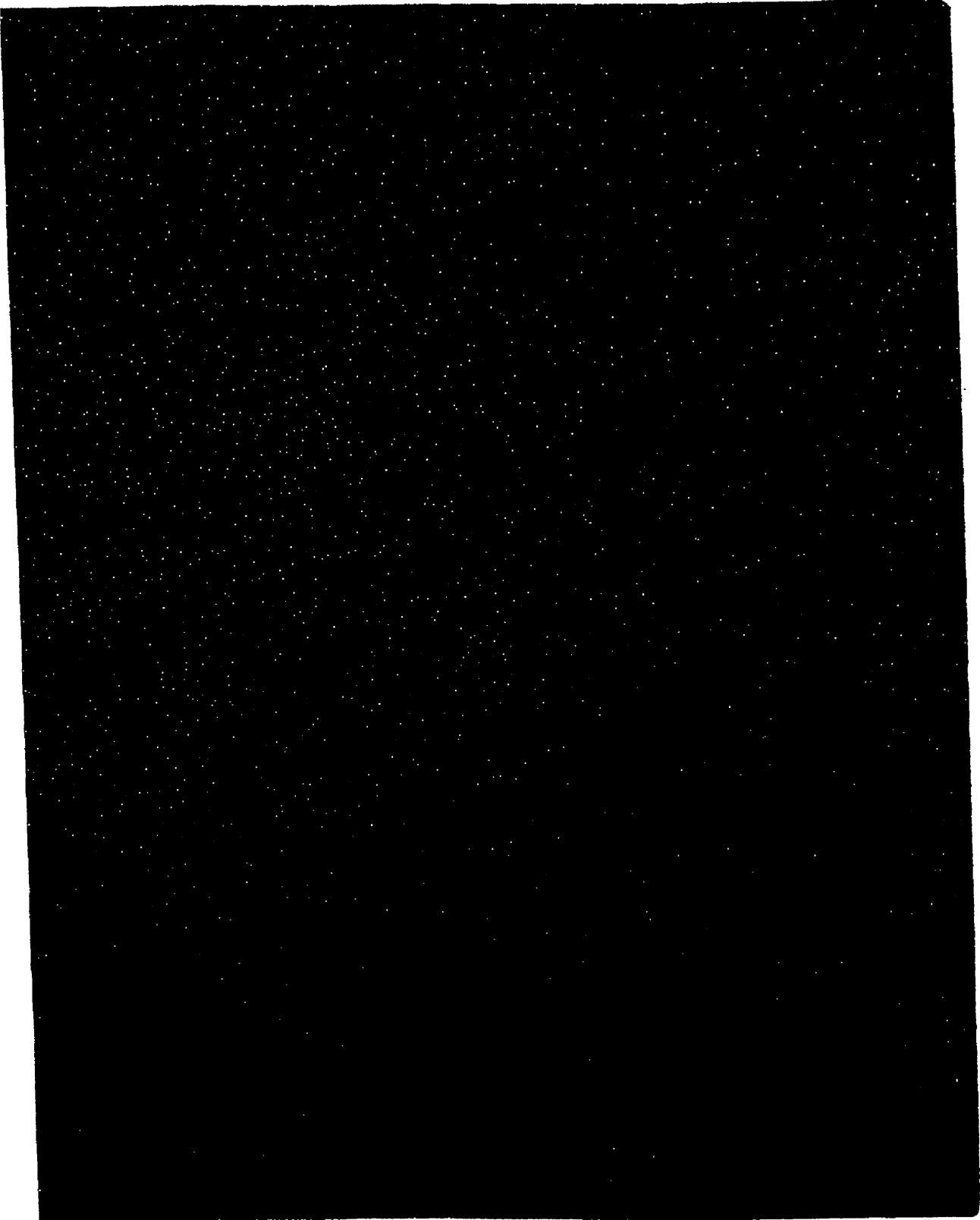
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- 2 [REDACTED]
- 3 [REDACTED]
- 4 [REDACTED]
- 5 [REDACTED]
- 6 [REDACTED] Benefits committee
- 7 approved formation of an equity investment manager
- 8 of the recommendation to reconfigure the pension fund
- 9 to diversify the investment allocation by using asset
- 10 nature based managers.
- 11 May 15, 2000 - Non-recurring gain in 1999 of \$96 million
- 12 from sale of Adelphia stock
- 13 of possible purchase of merchant power plant in Rhode Island
- 14 Co. is exploring strategic initiatives related
- 15 to consolidation of the electric industry due
- 16 to regulatory changes
- 17 Contract made with GE for 66 combustion turbine
- 18 generators
- 19 approved audit committee
- 20
- 21 June 2, 2000 - FPL Group Energy Services Co., F. Duke Lane
- 22 joined to form an interest-bearing procurement Co
- 23 called Parallel. Dividend issued \$54 cents/share
- 24 renewed Energy Services
- 25 new agreements for Armando Olvera & Antonio
- 26 Rodriguez. Approved purchase of Grand
- 27 Argentia membership
- 28
- 29 Sept. 11, 2000 - Board Commission to study being discussed
- 30 Openlinka / Pireola Agreement approved
- 31 nuclear plants - can sell DOE for 10% for 10 years of
- 32 contract for taking delivery of spent nuclear fuel
- 33 proposing to recover under-recovery on fuel
- 34 over 2 yrs instead of one. Discussed Energy merger.
- 35 FPL Energy is thinking of investing in a wind
- 36 project in Texas, a gas-fired plant in Texas, a gas-fired
- 37 in Pennsylvania. Approved changes in
- 38 ~~contract~~ ~~agreement~~ of ~~contract~~ ~~plan~~ ~~to~~ ~~the~~ ~~the~~
- 39 ~~board~~ ~~initiate~~ ~~change~~
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- 41 ~~generator~~
- 42

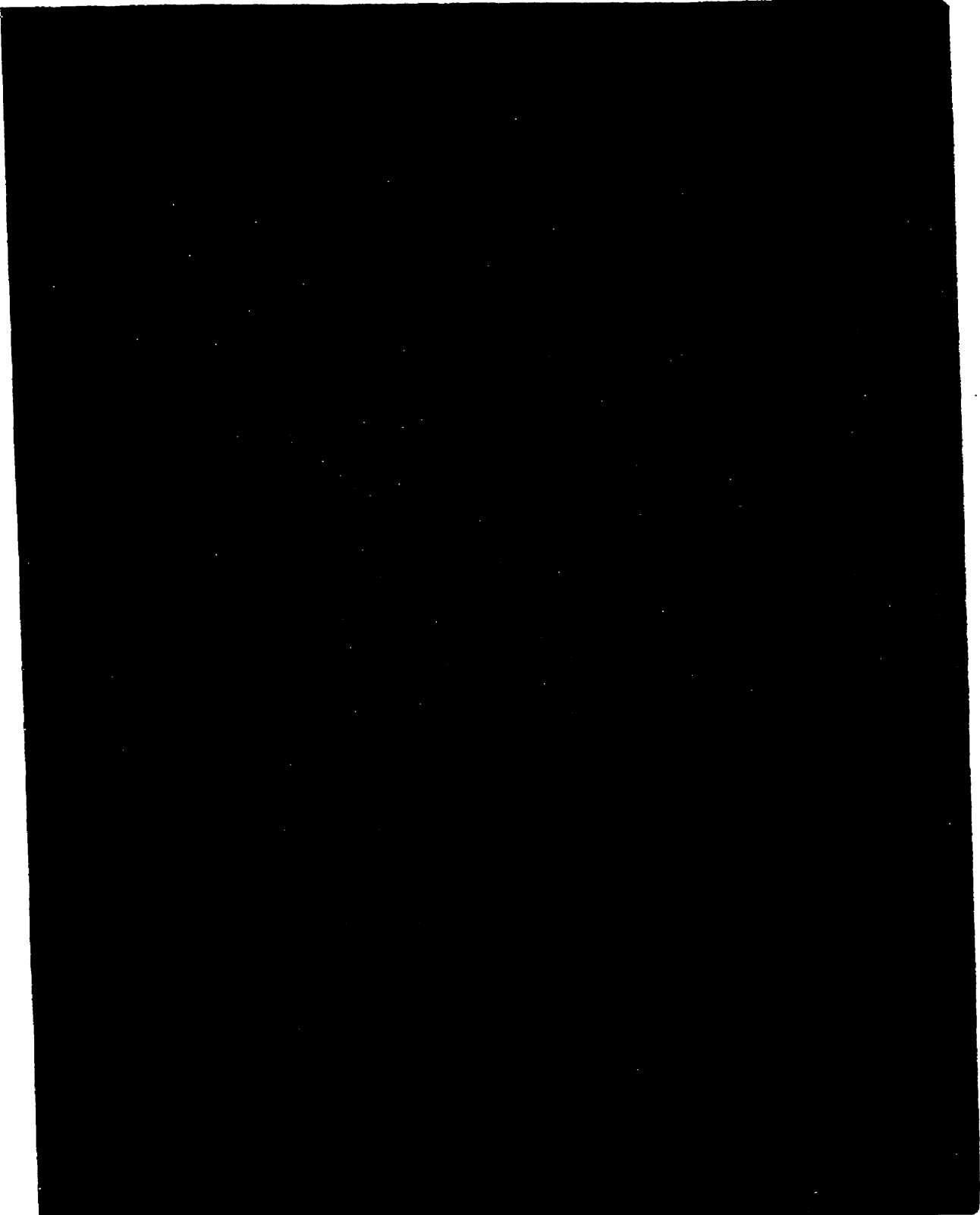


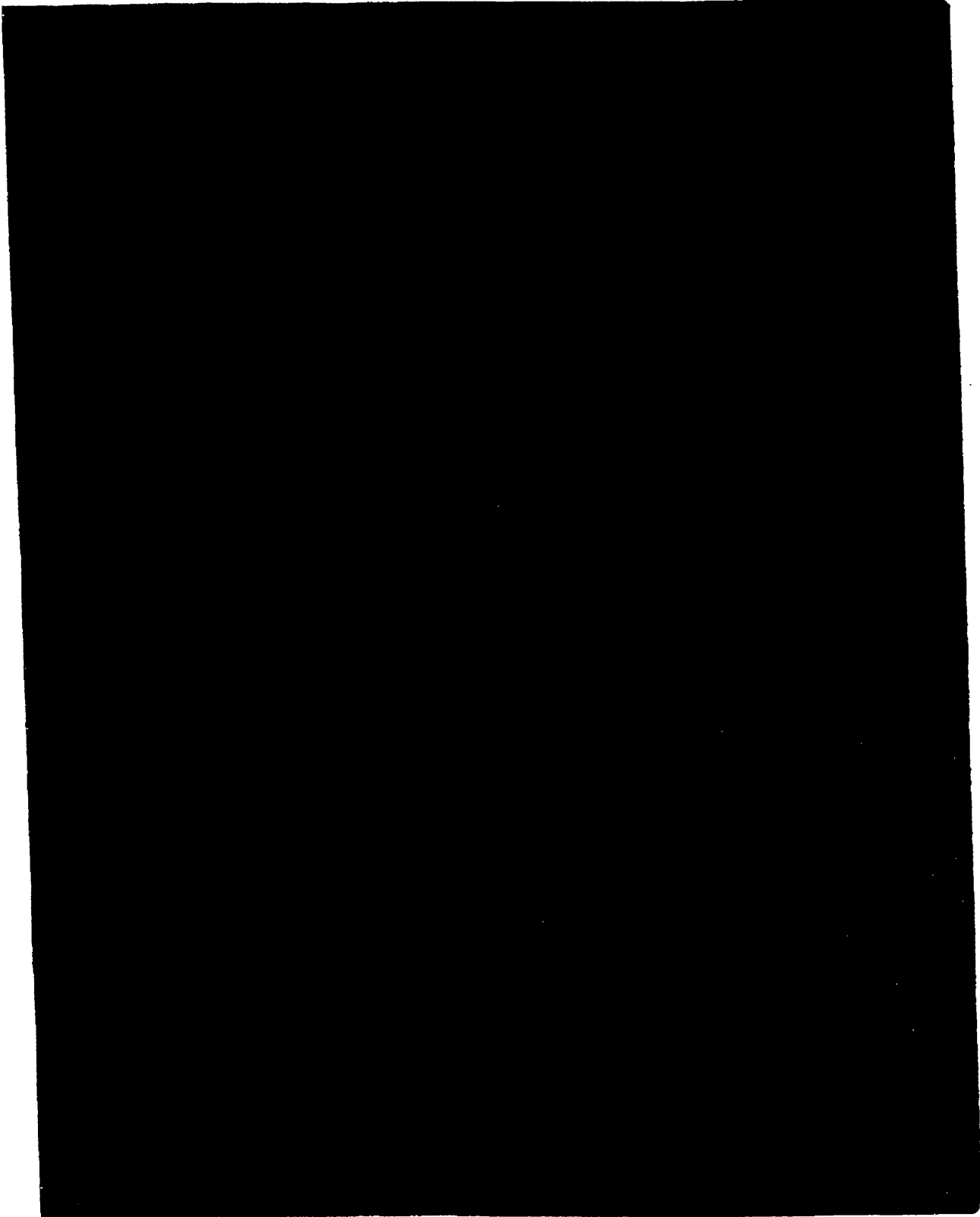


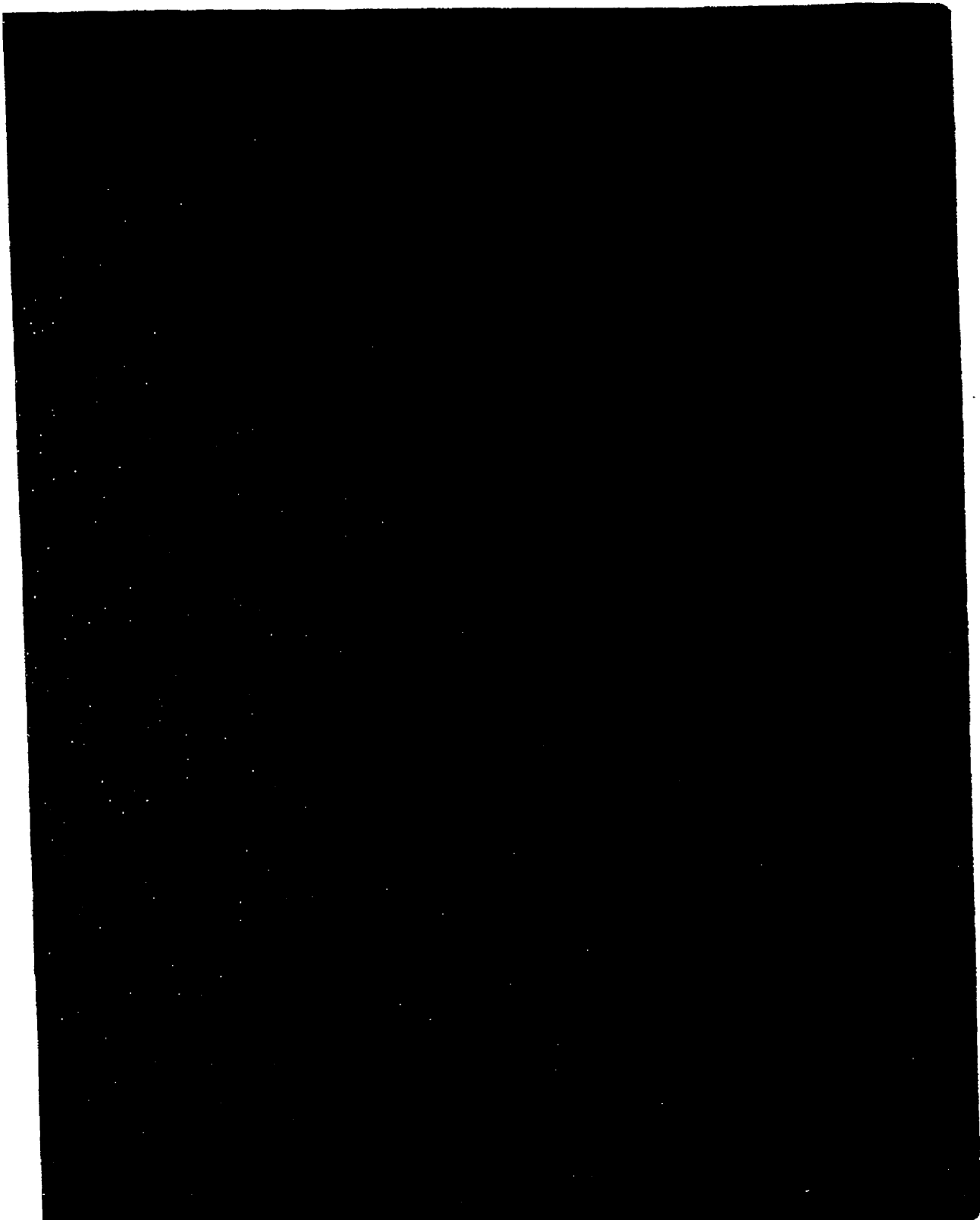
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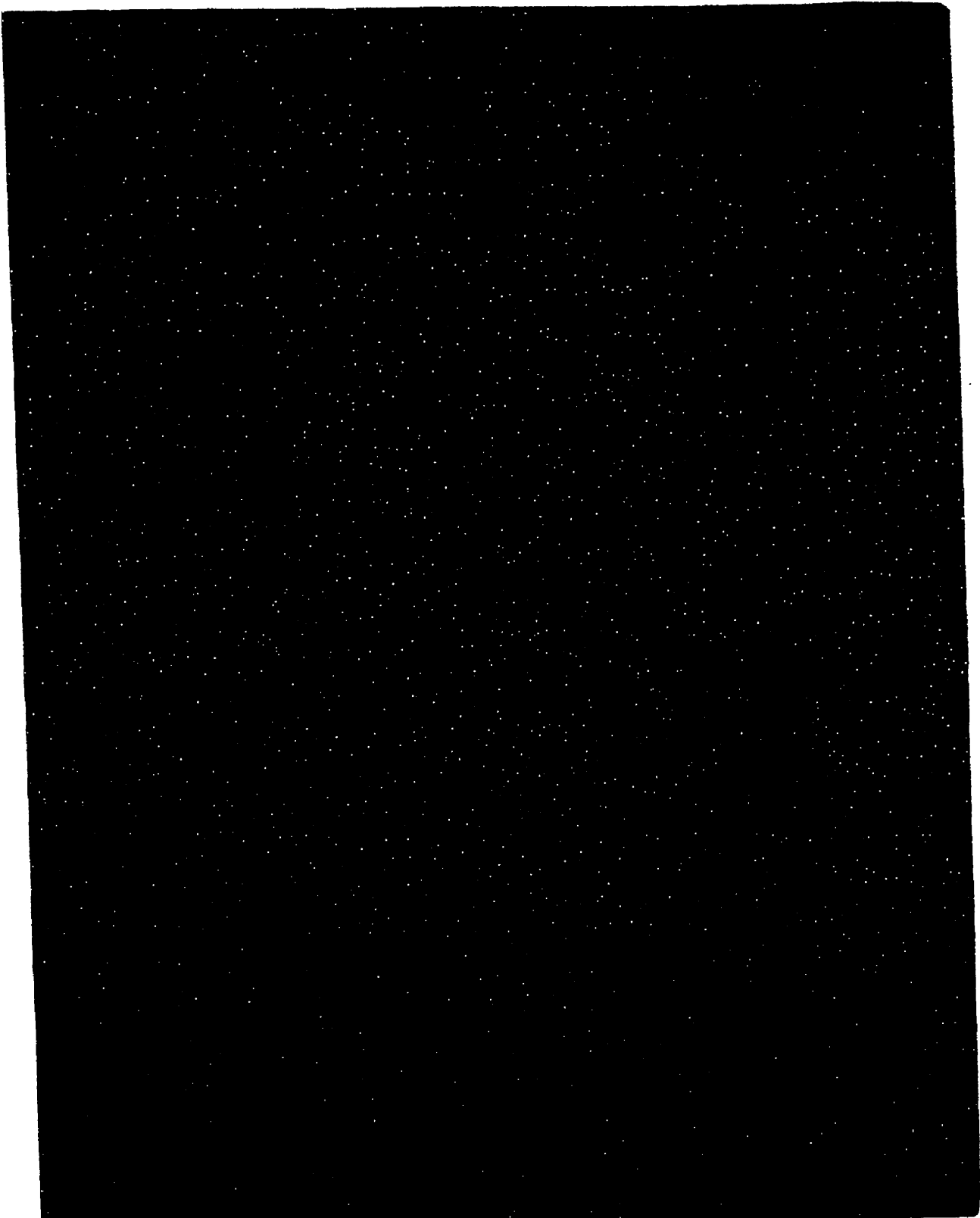


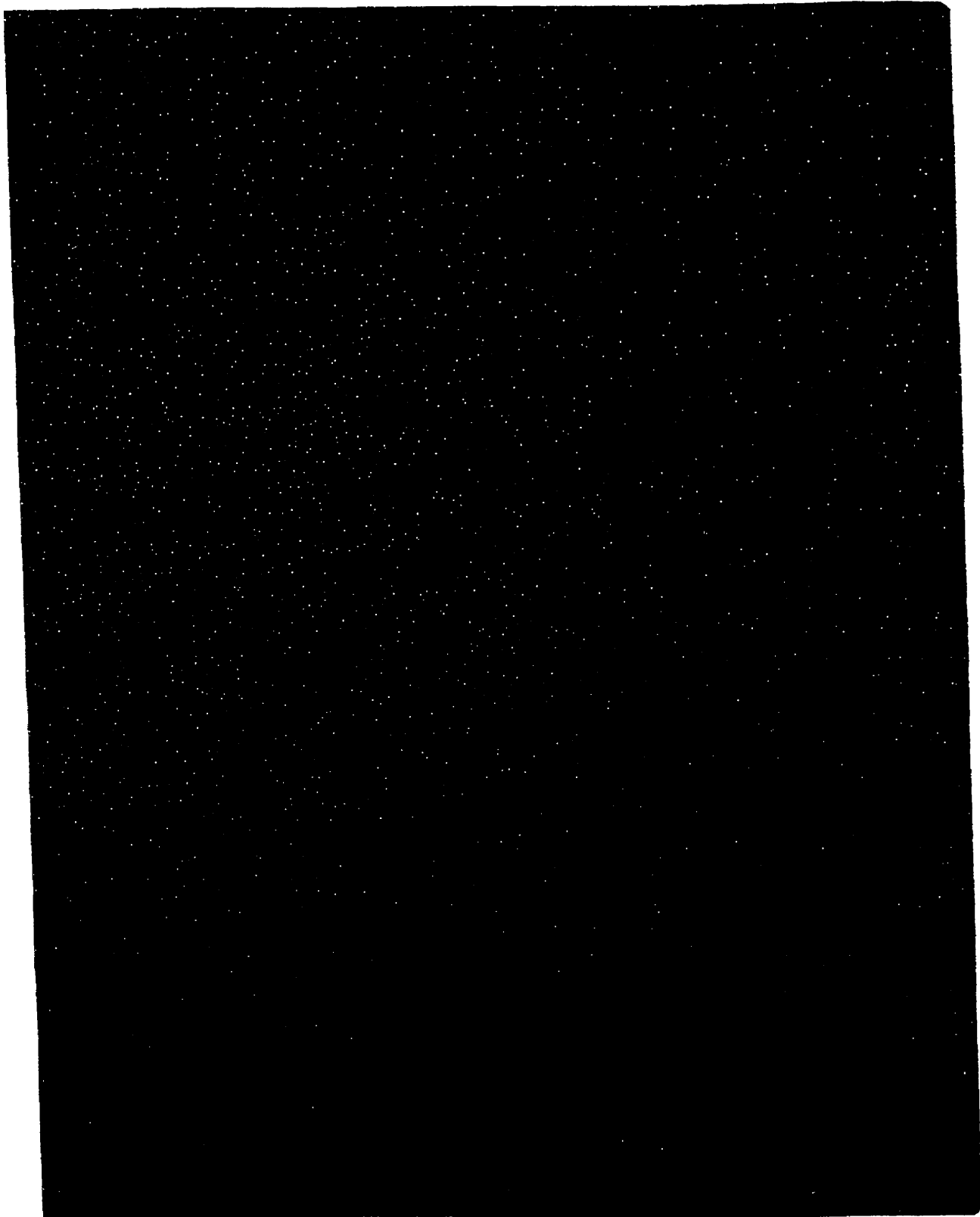




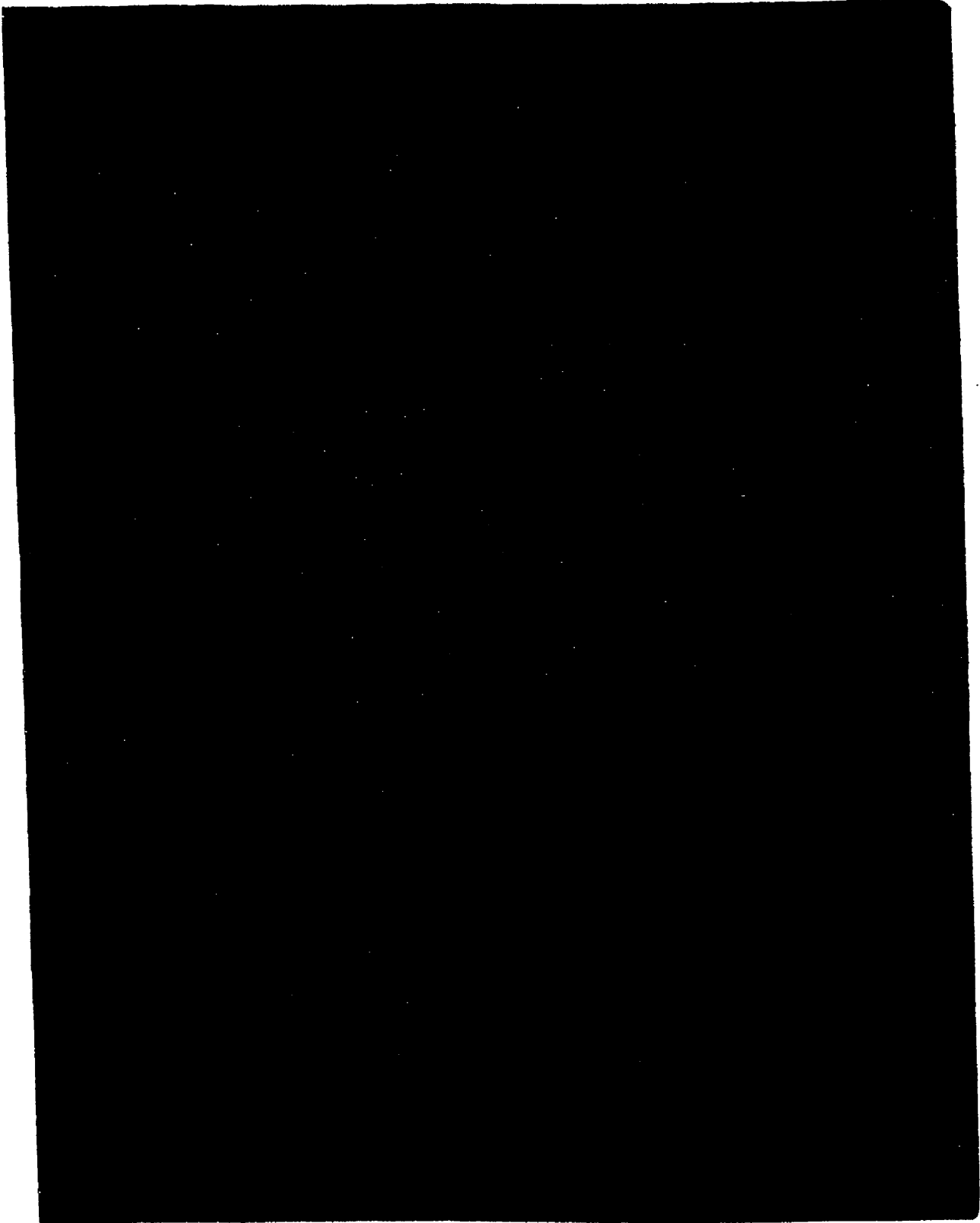




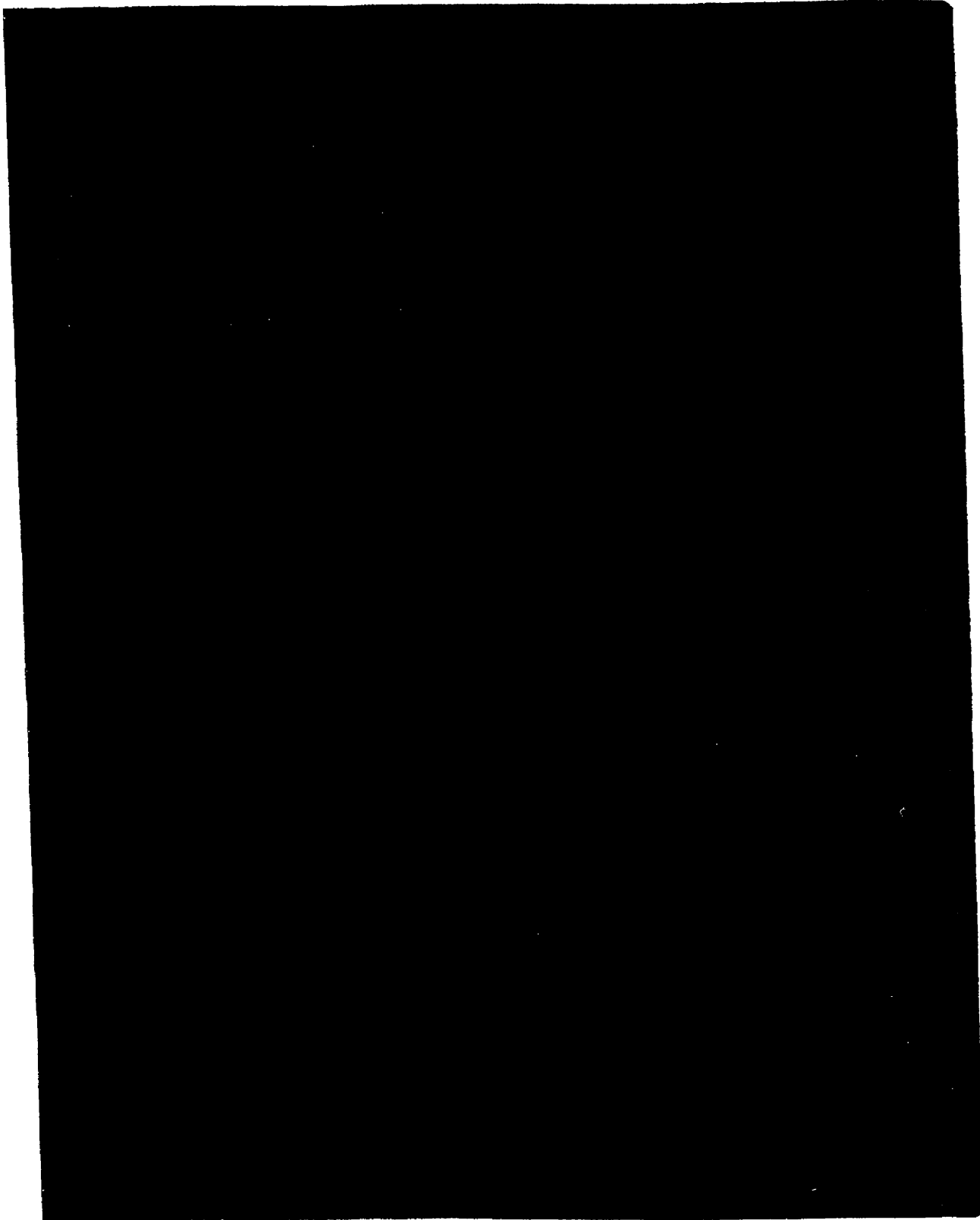




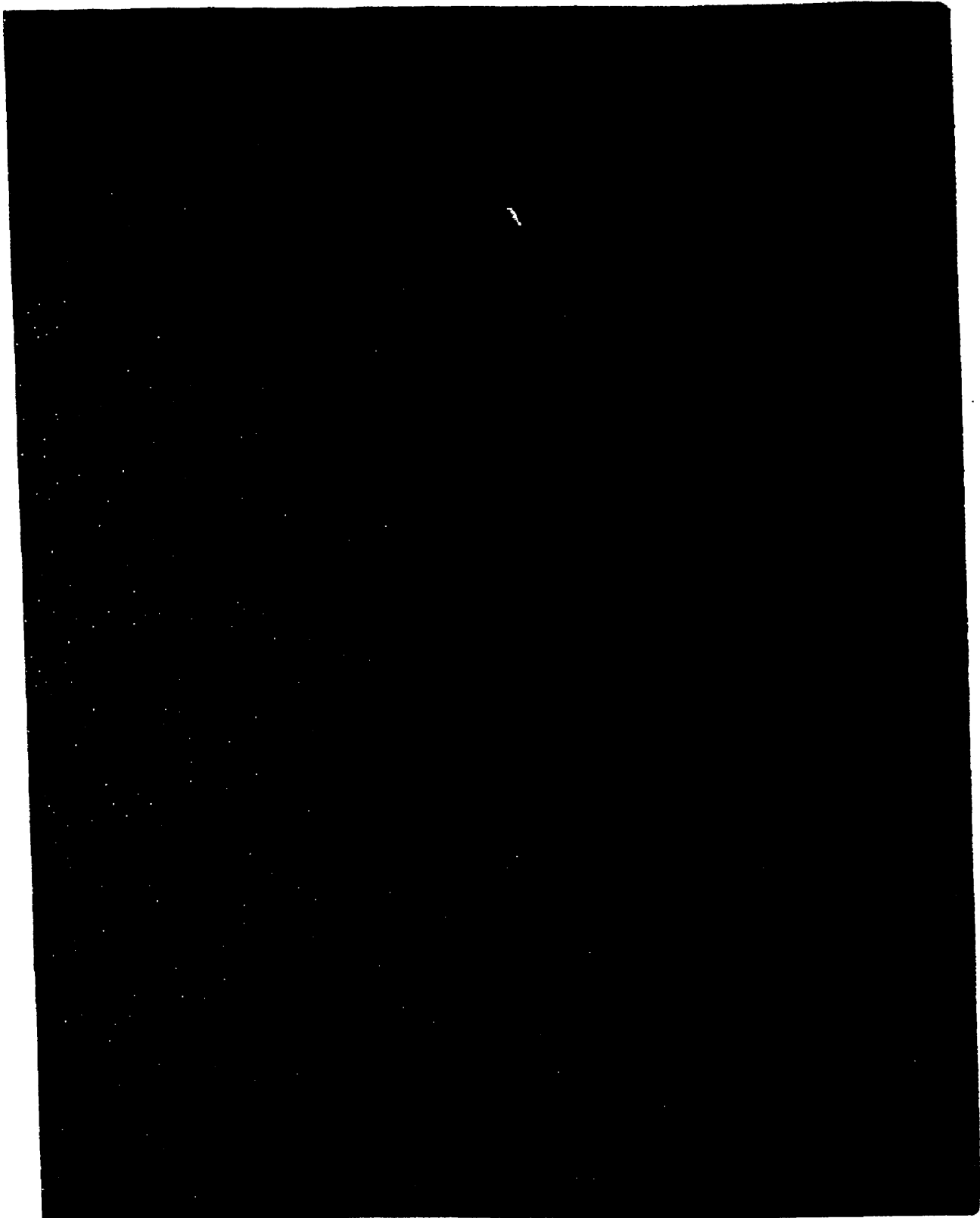
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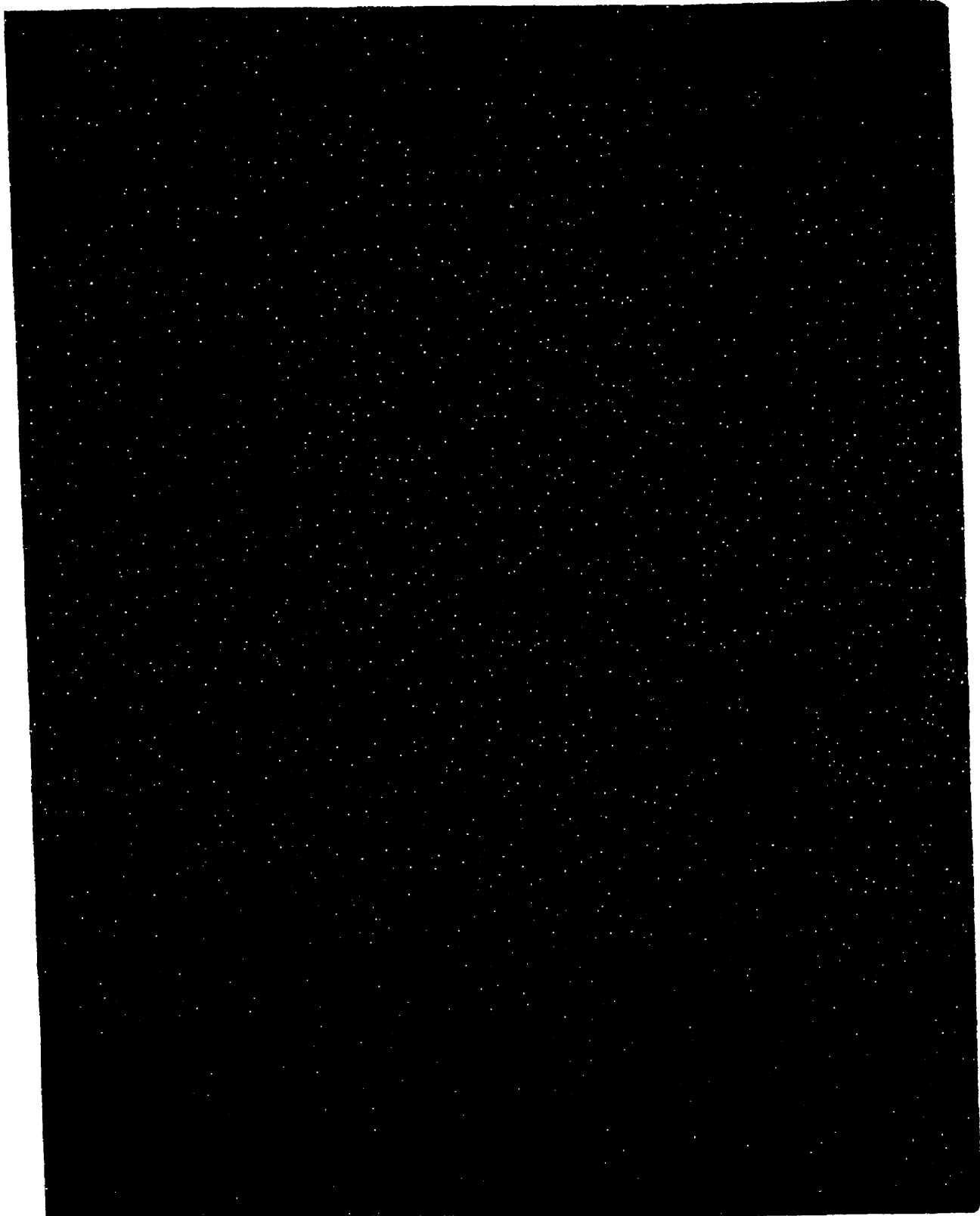
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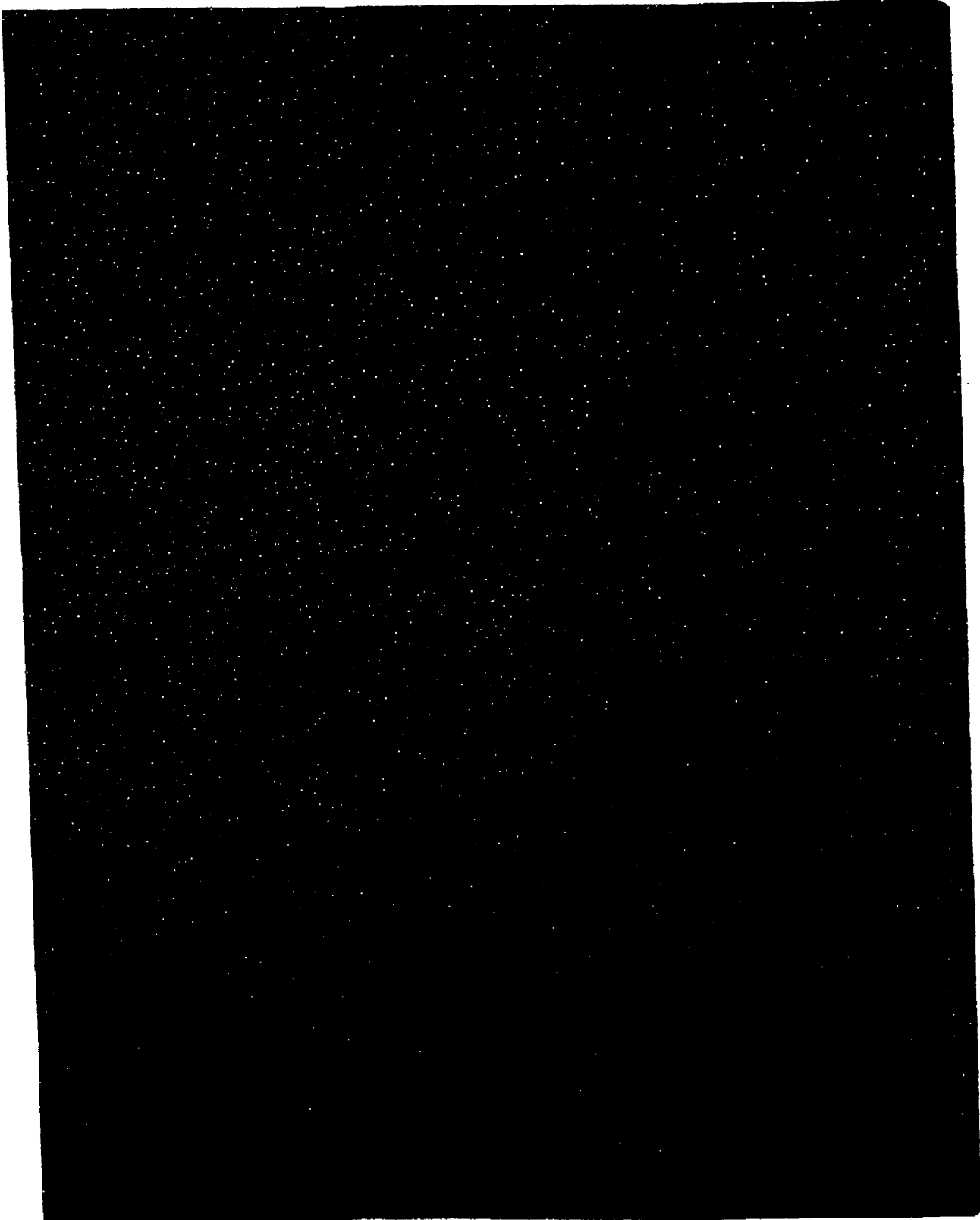
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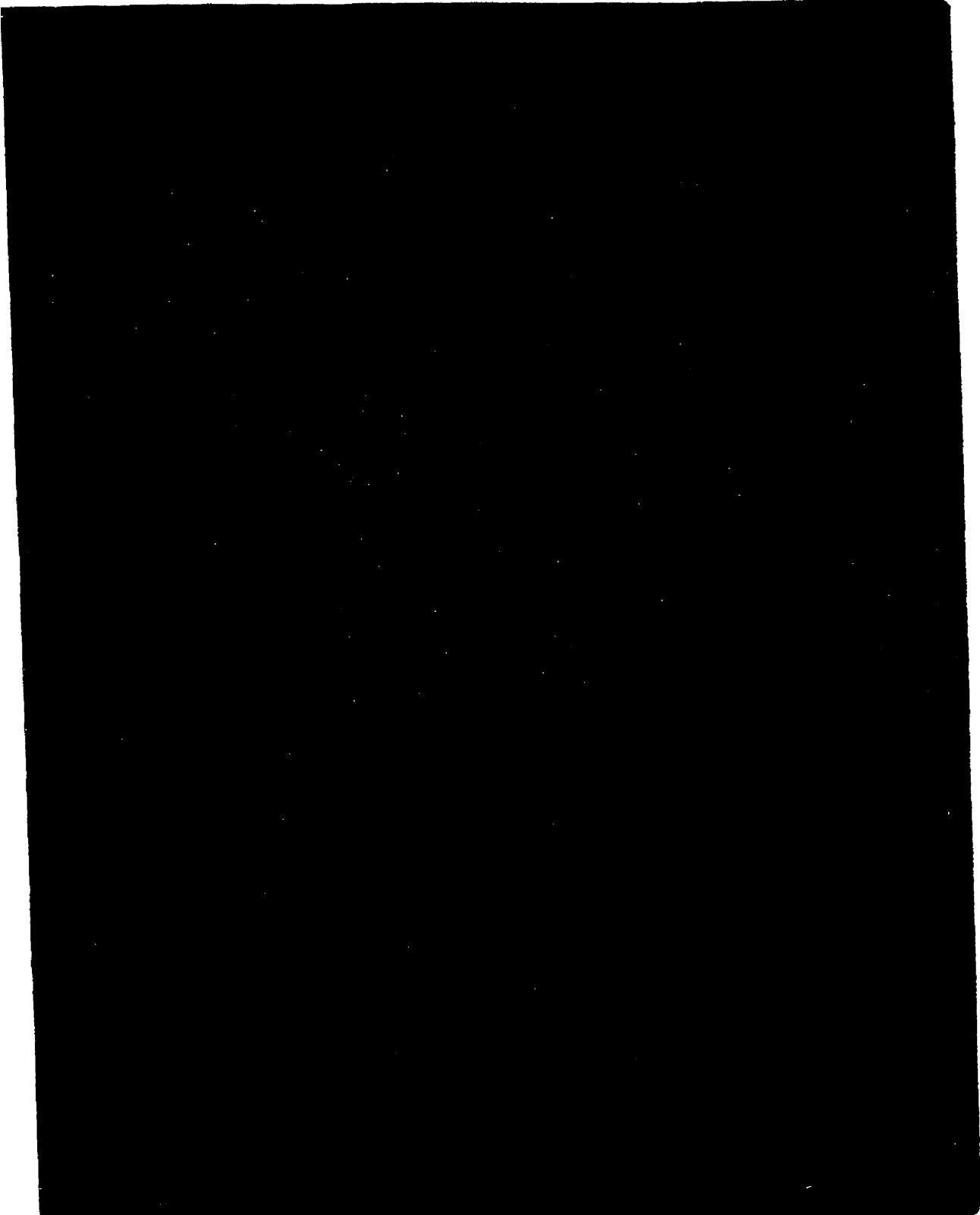
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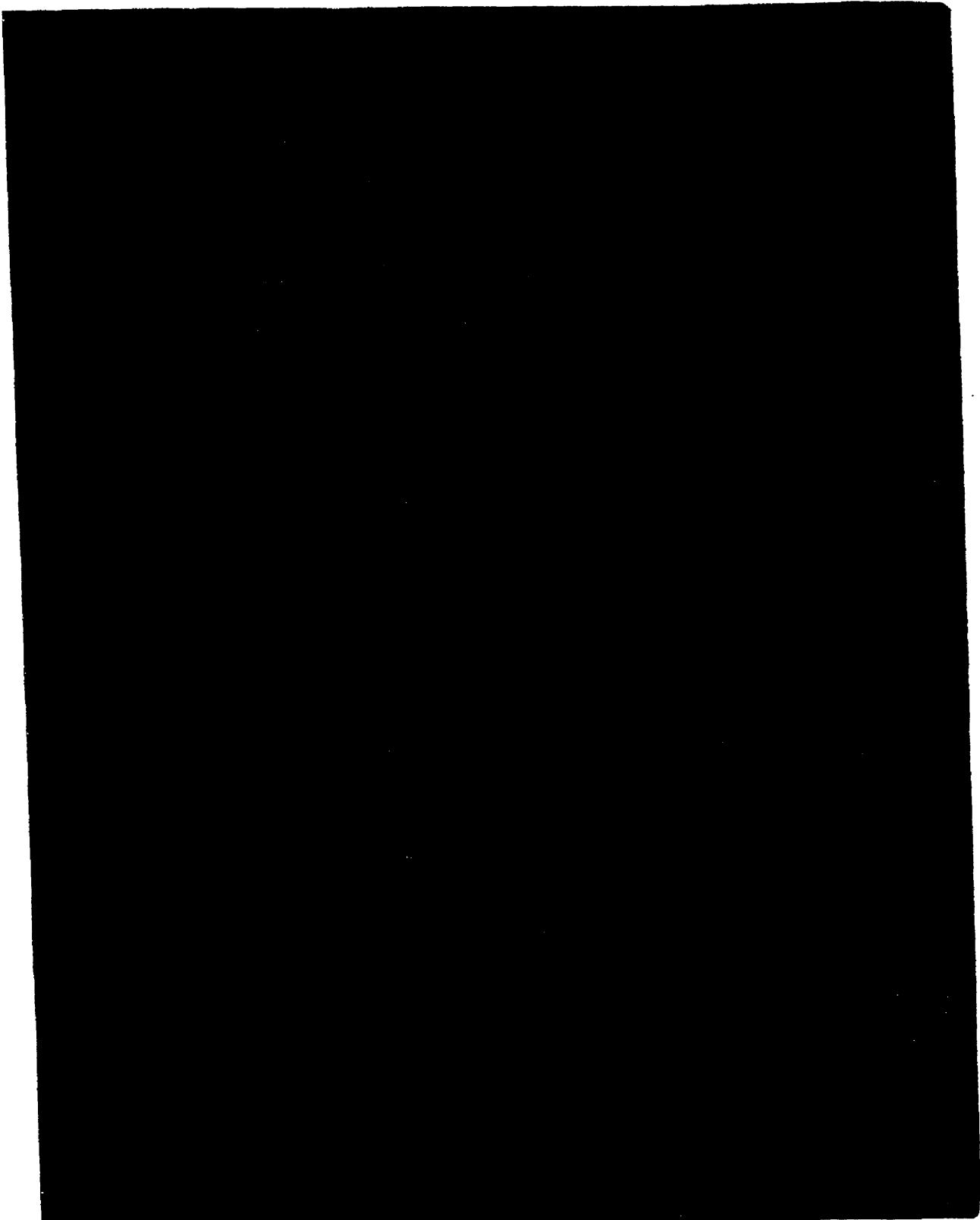


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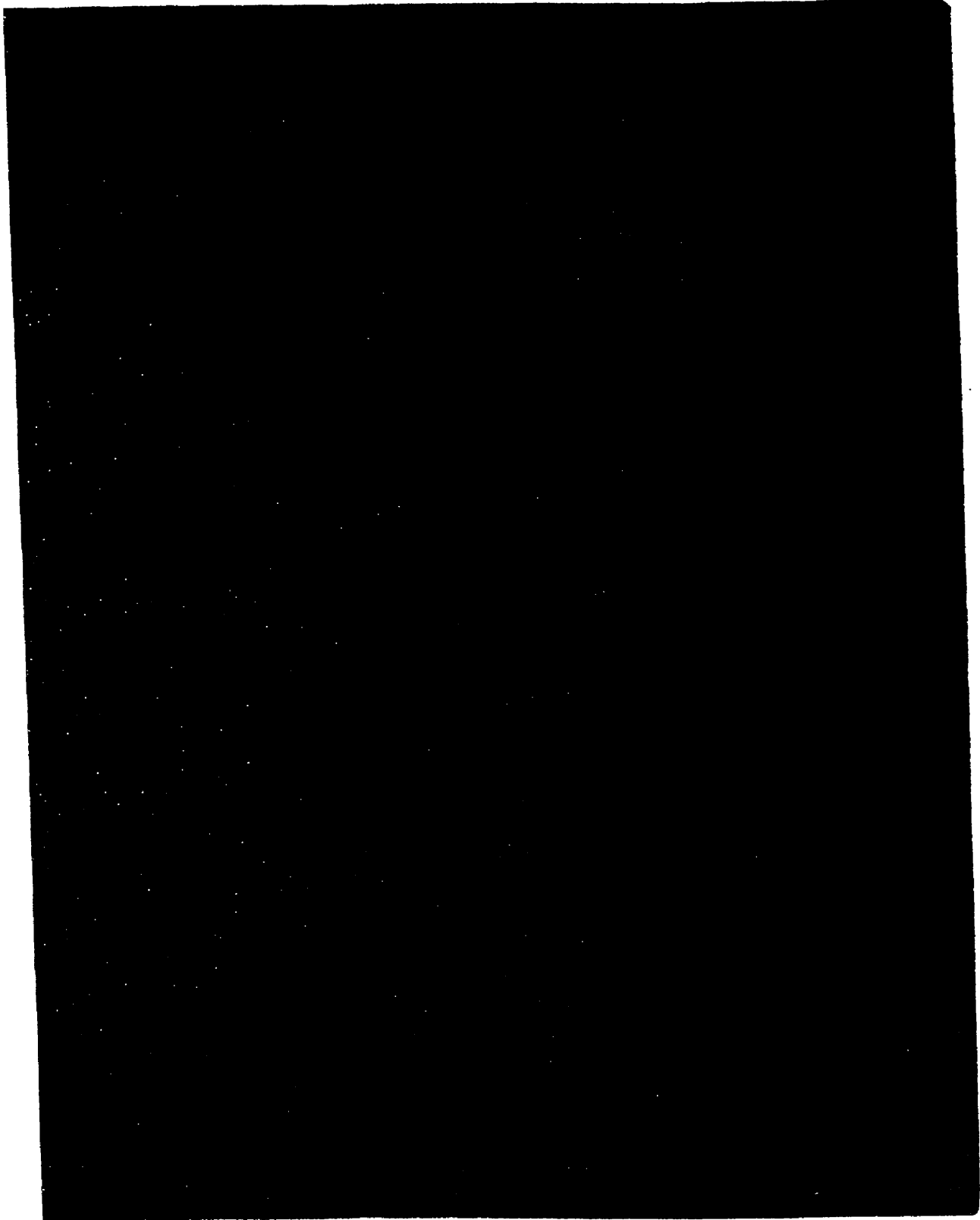


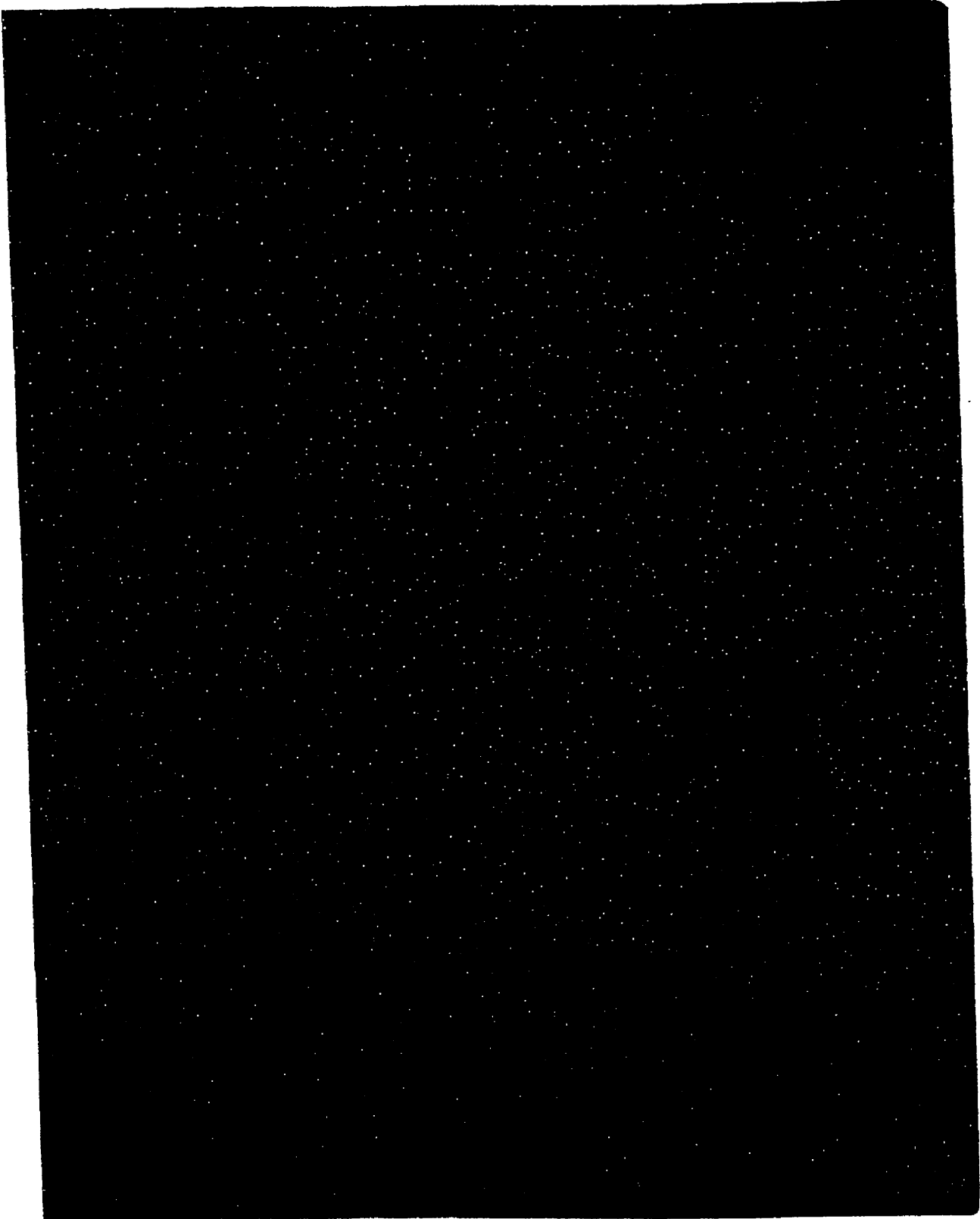
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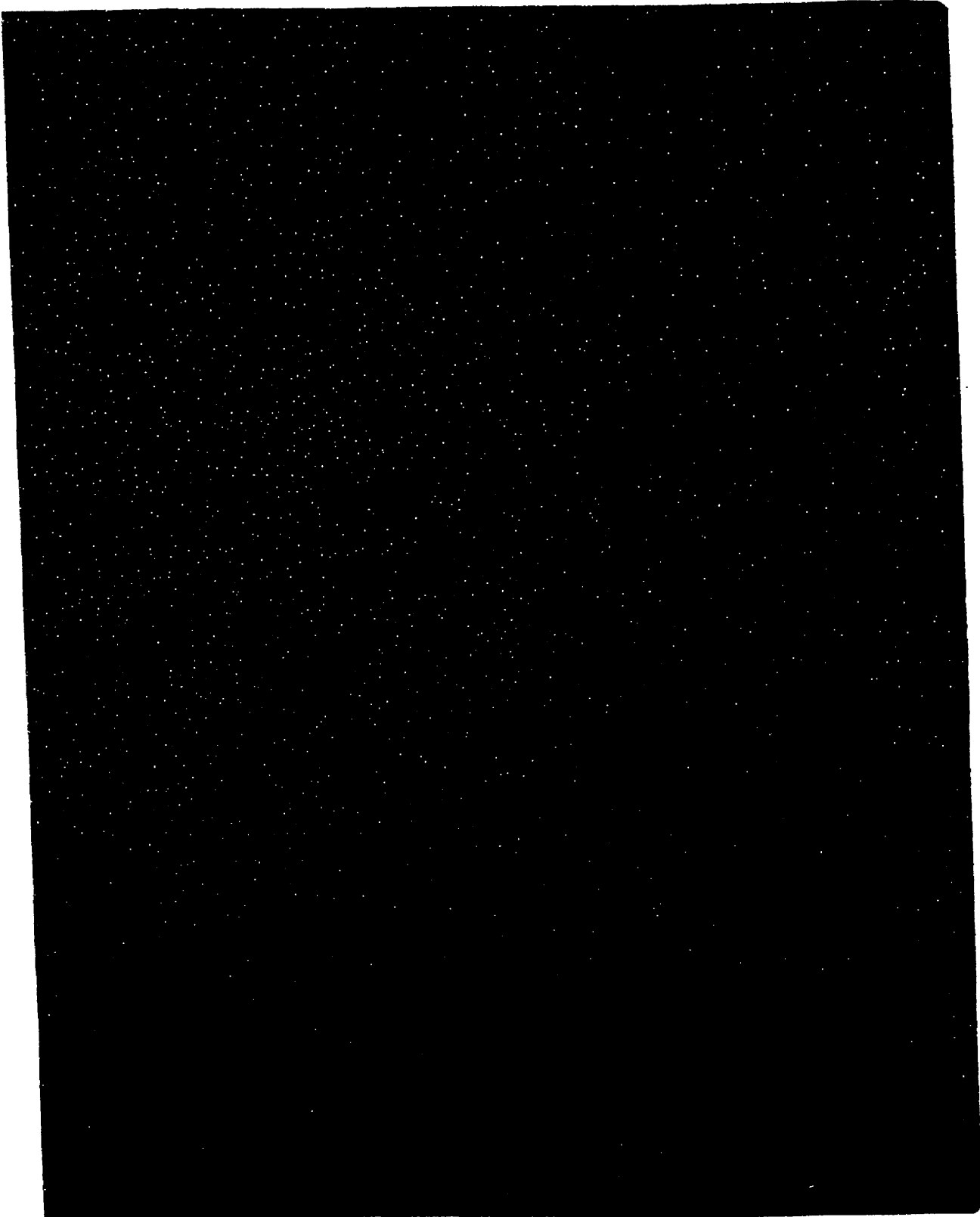




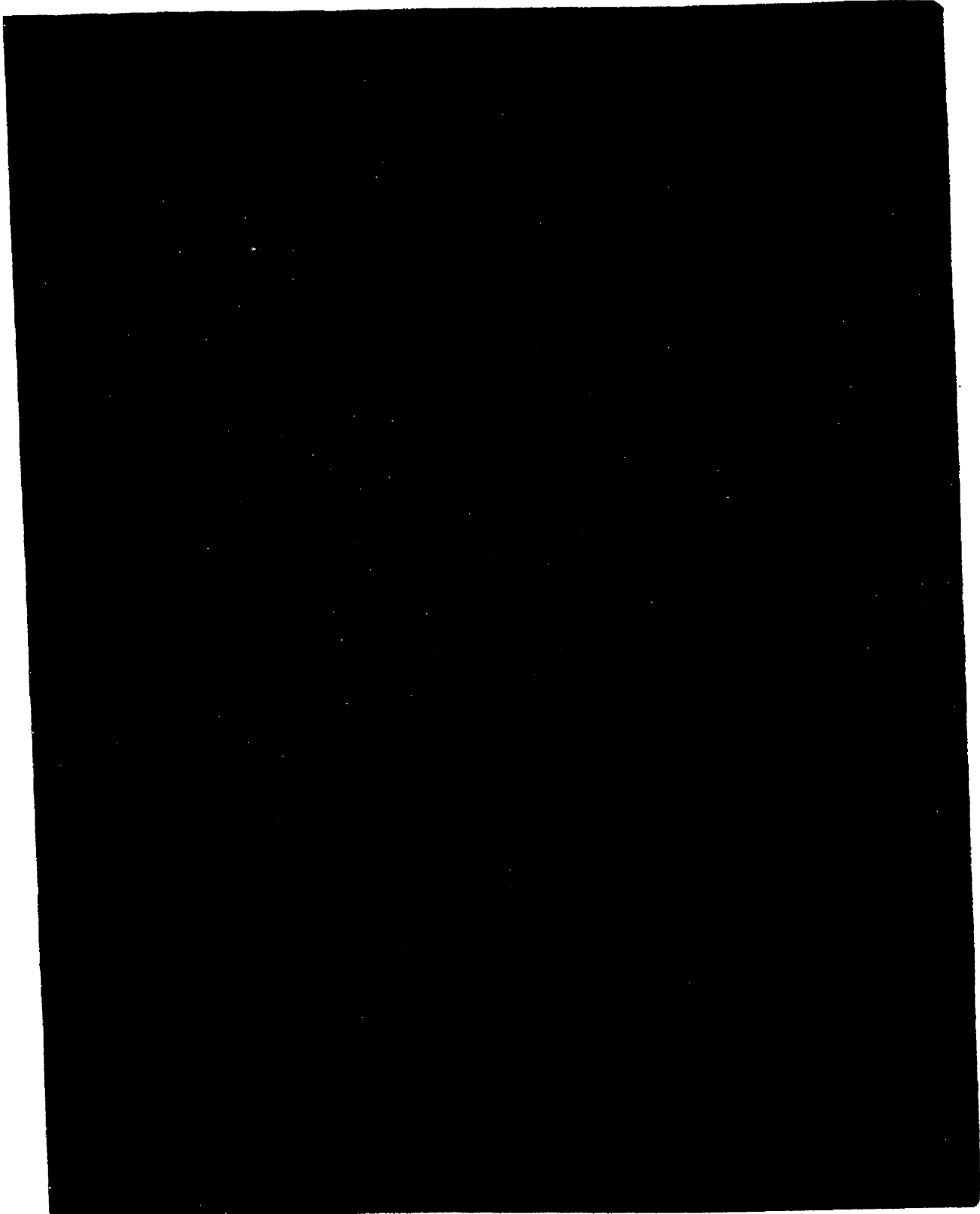
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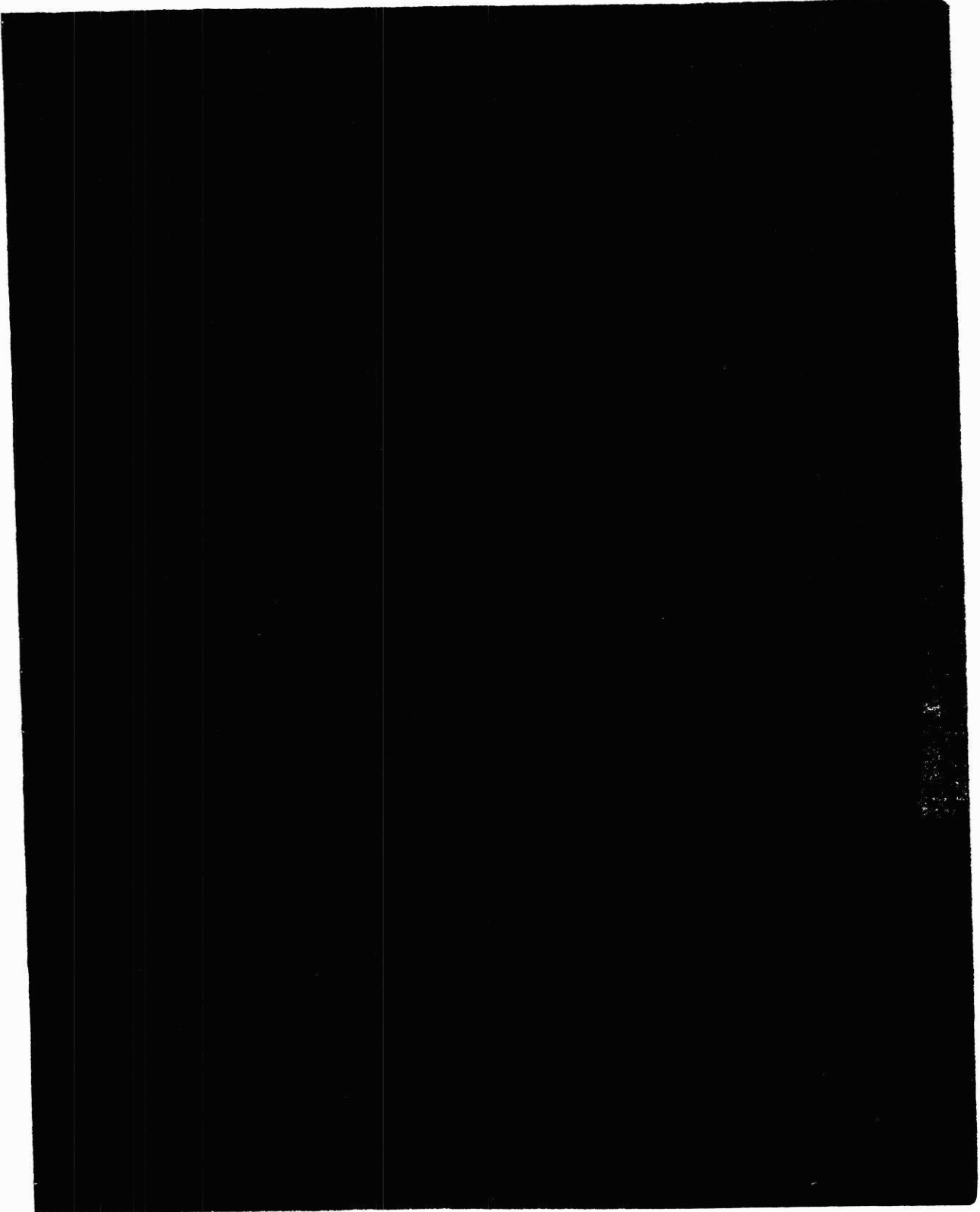




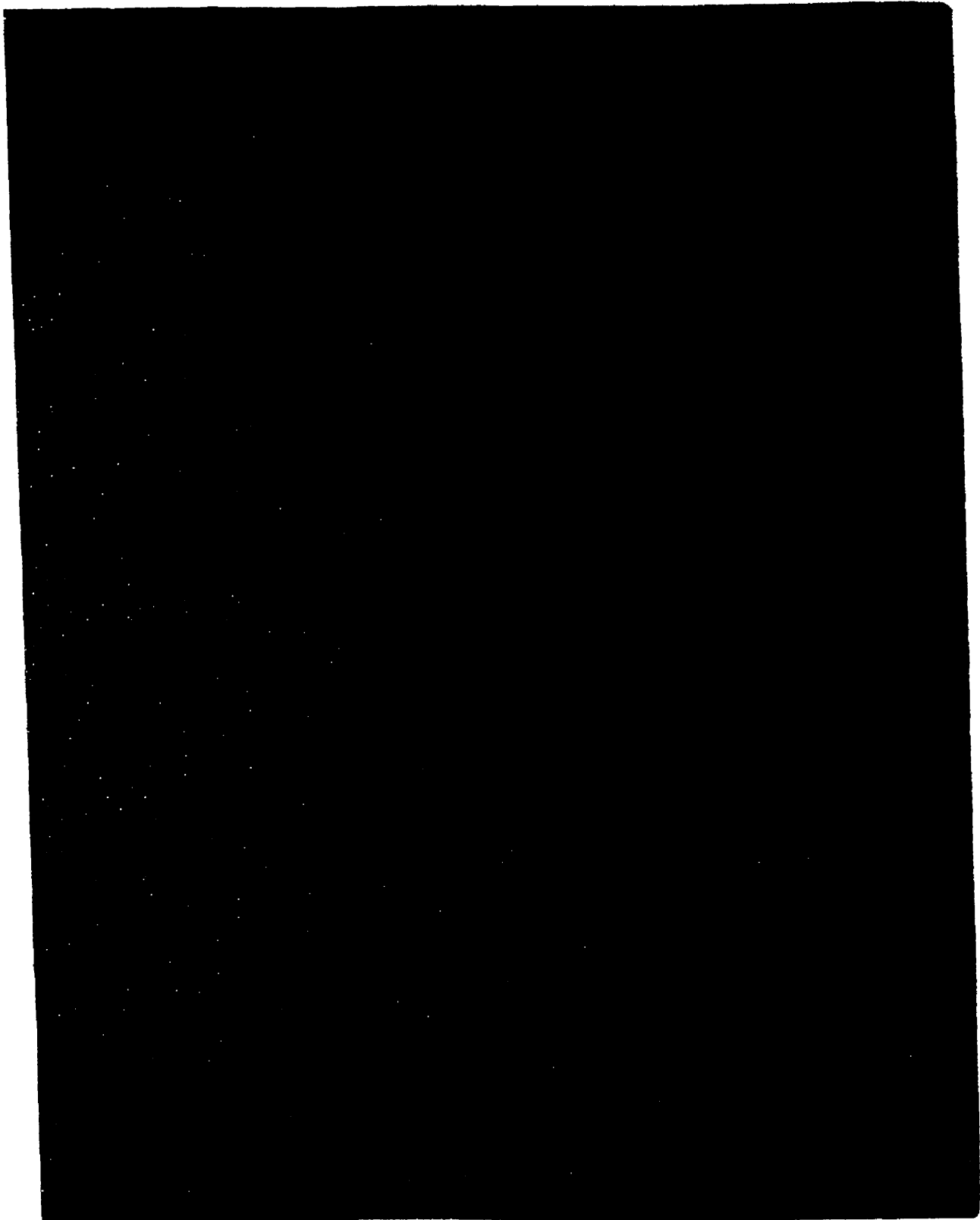


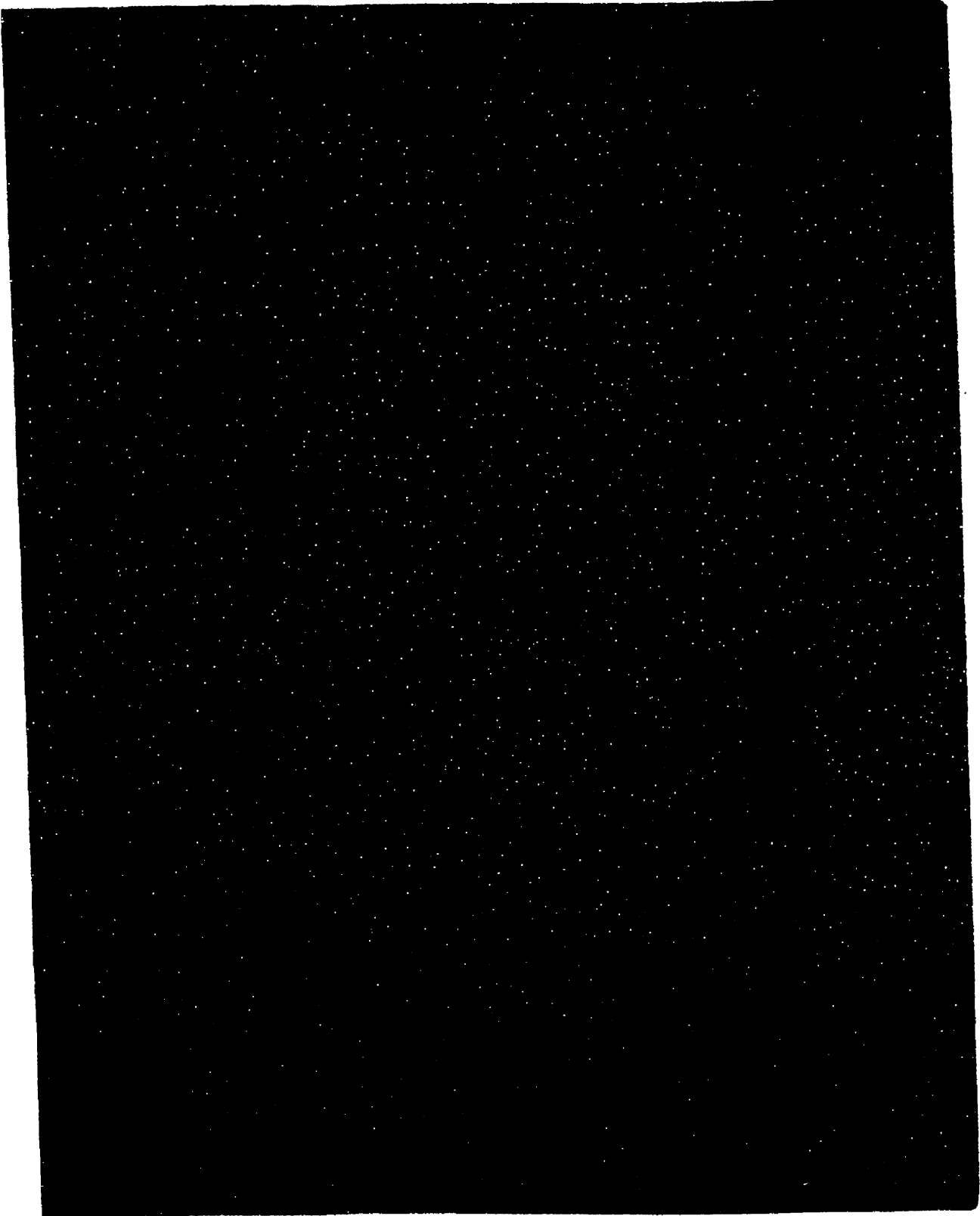
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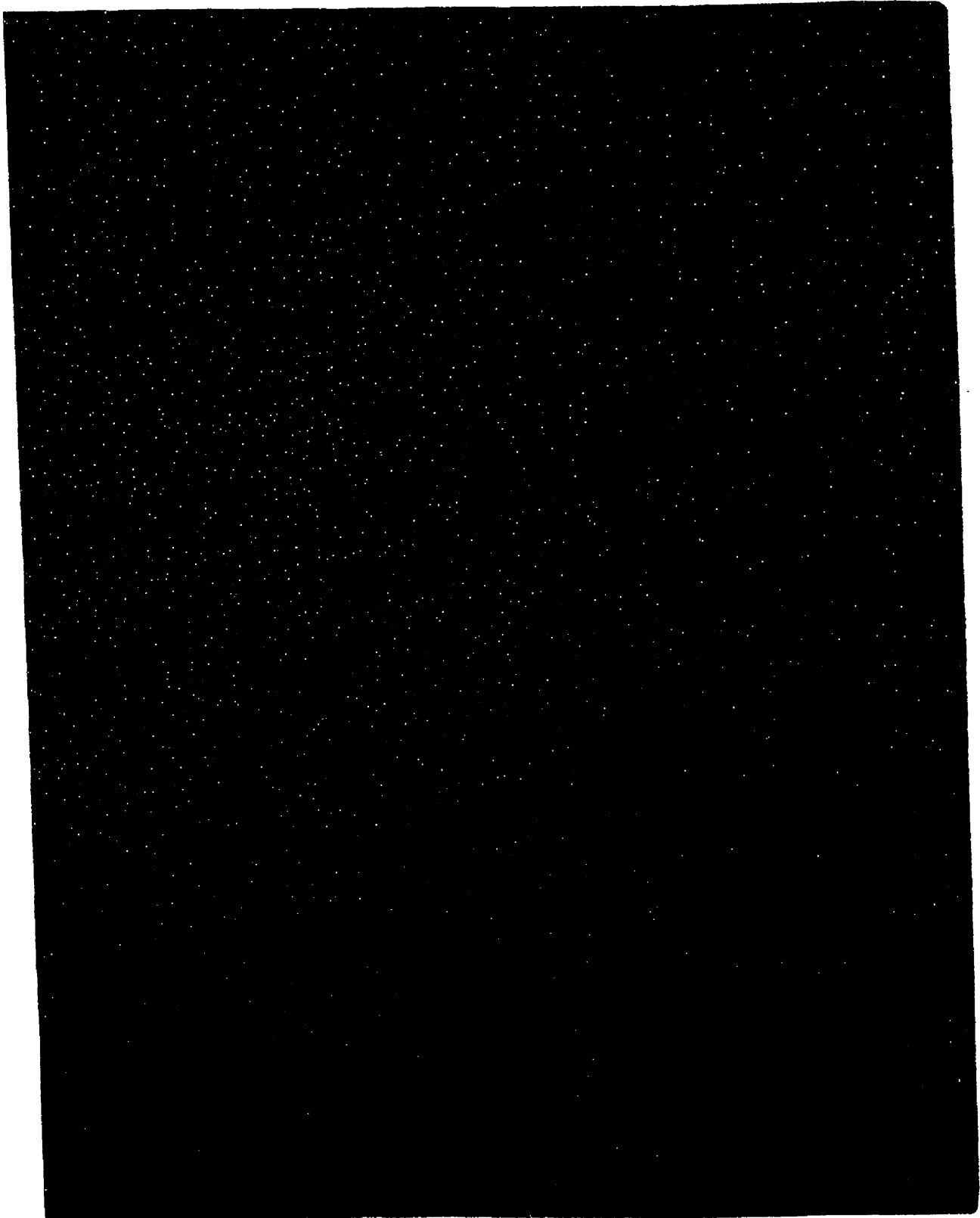


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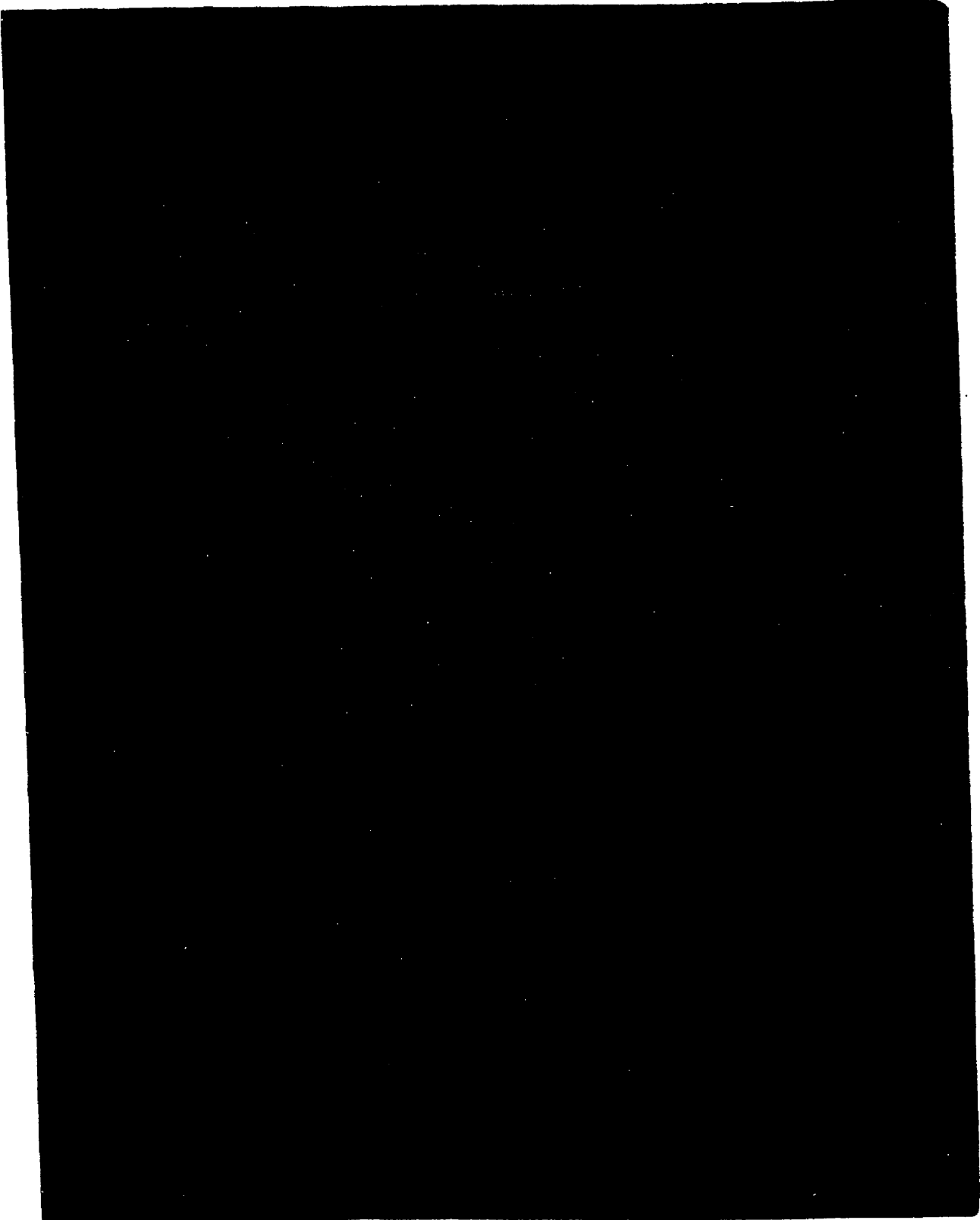




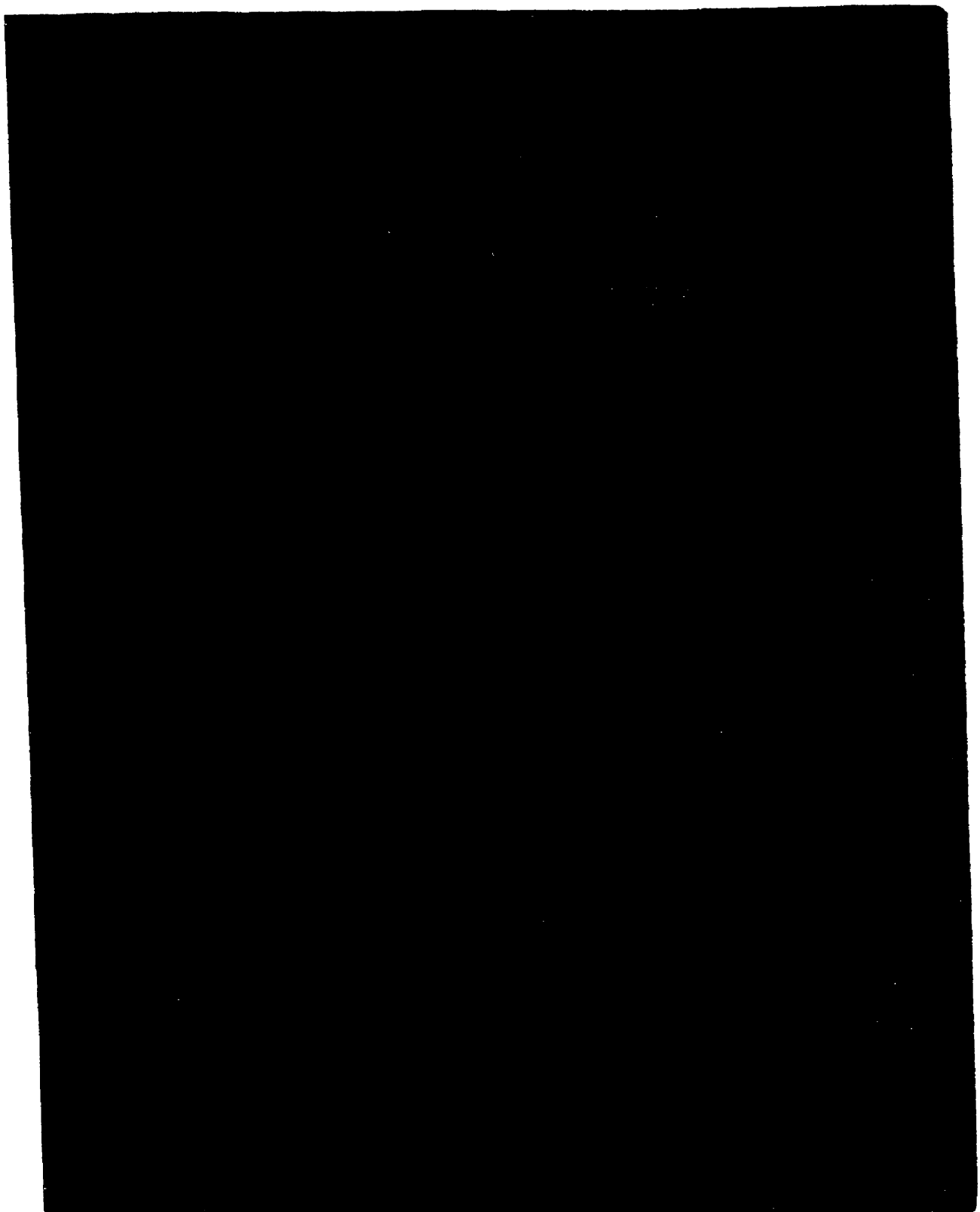
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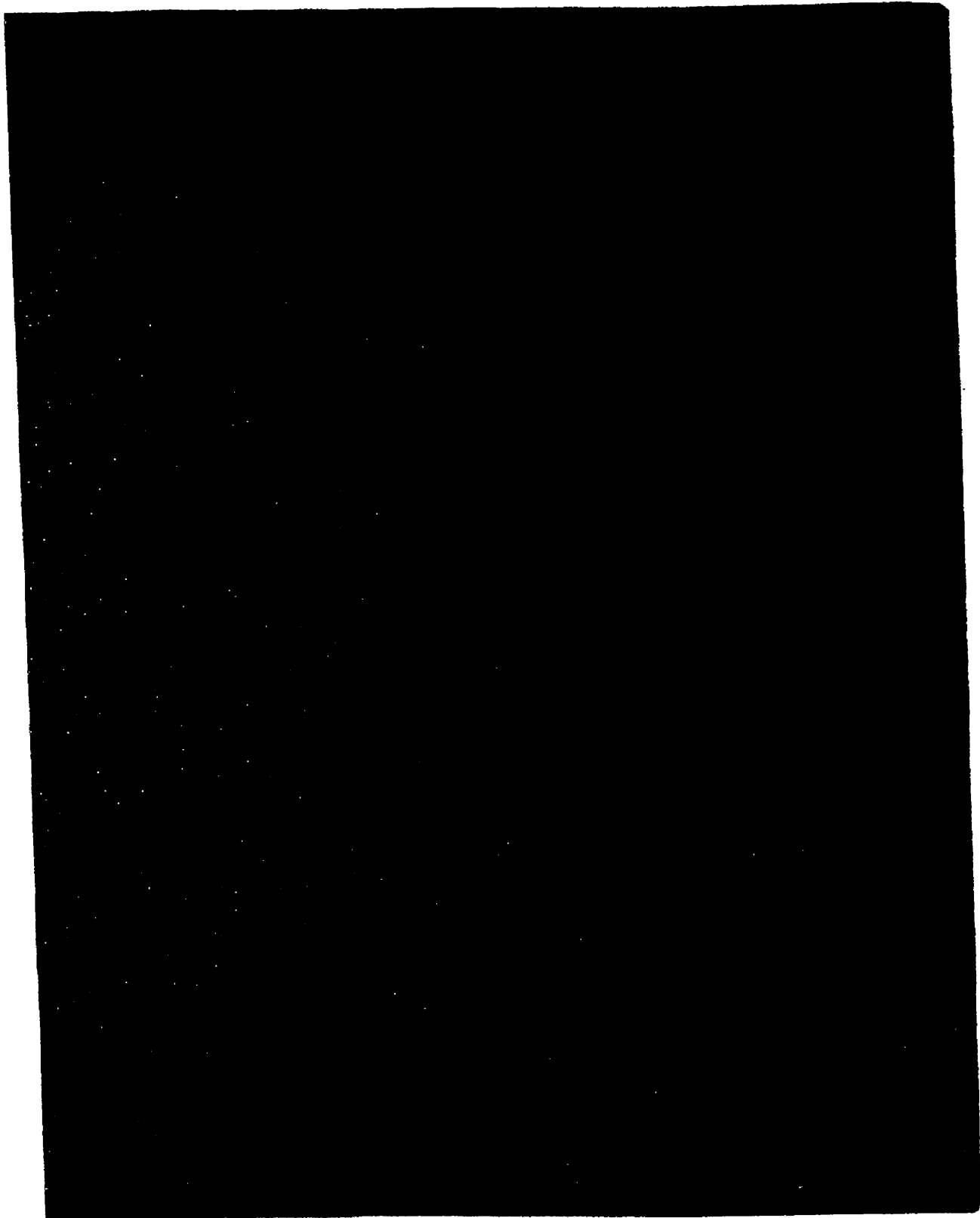
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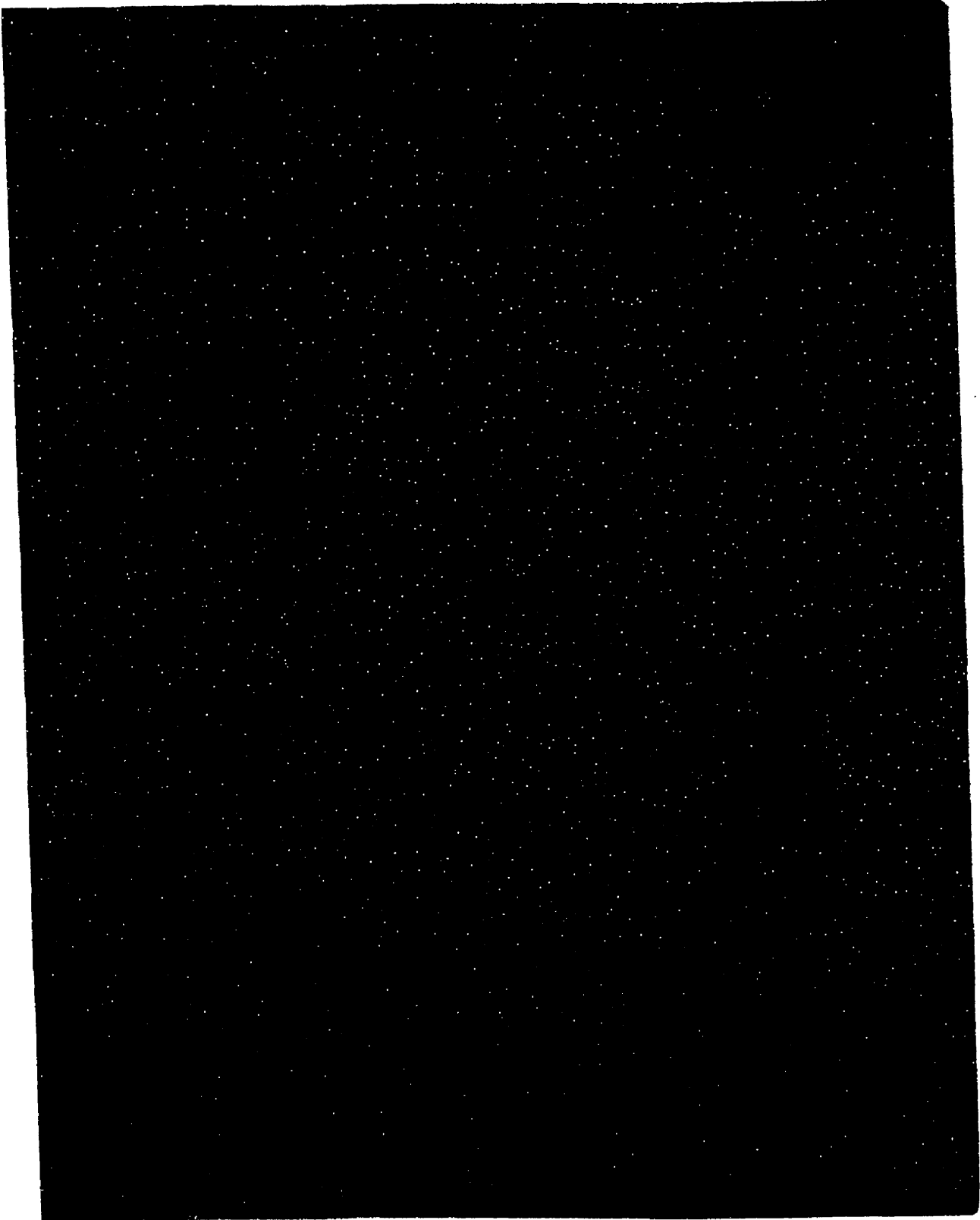
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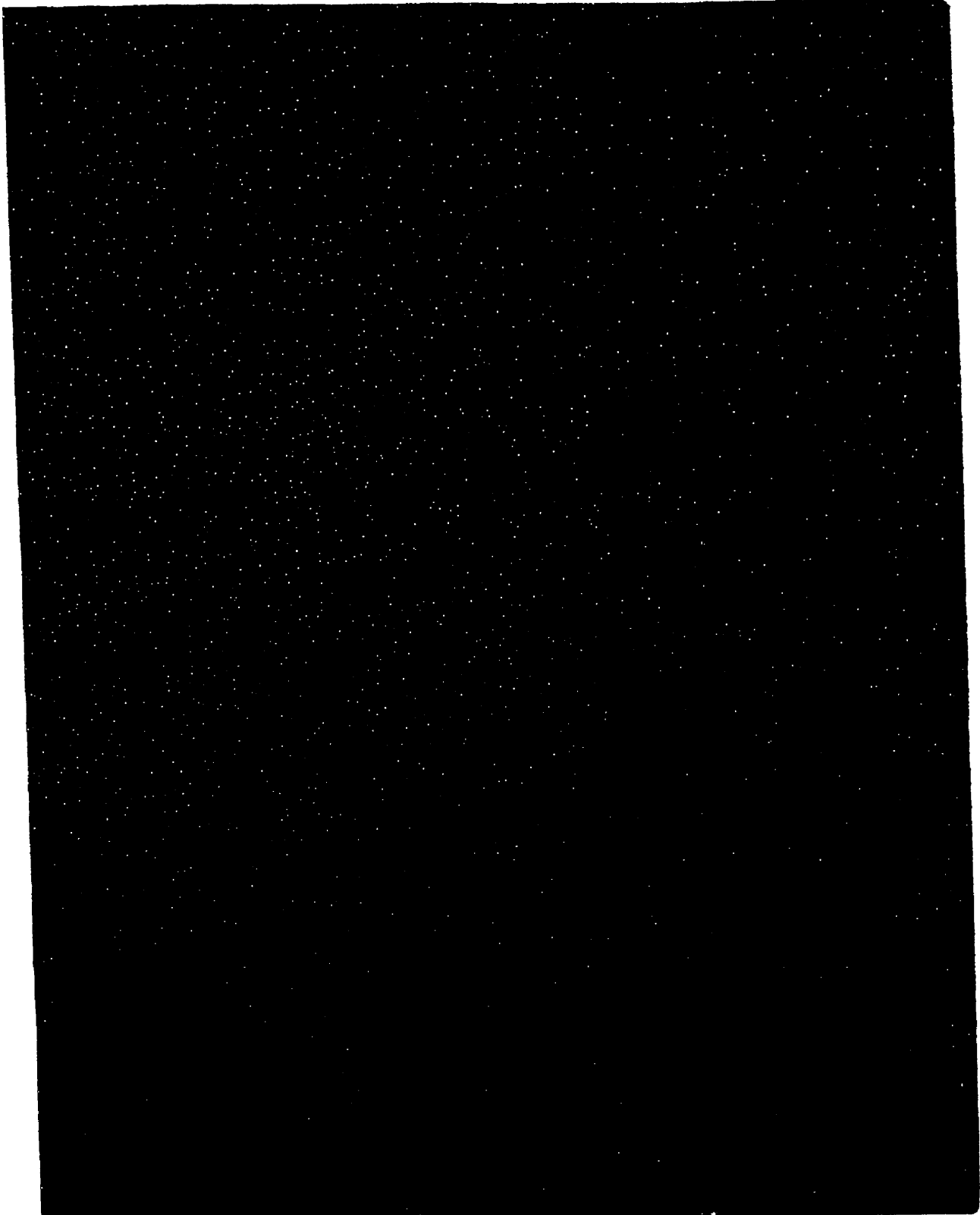


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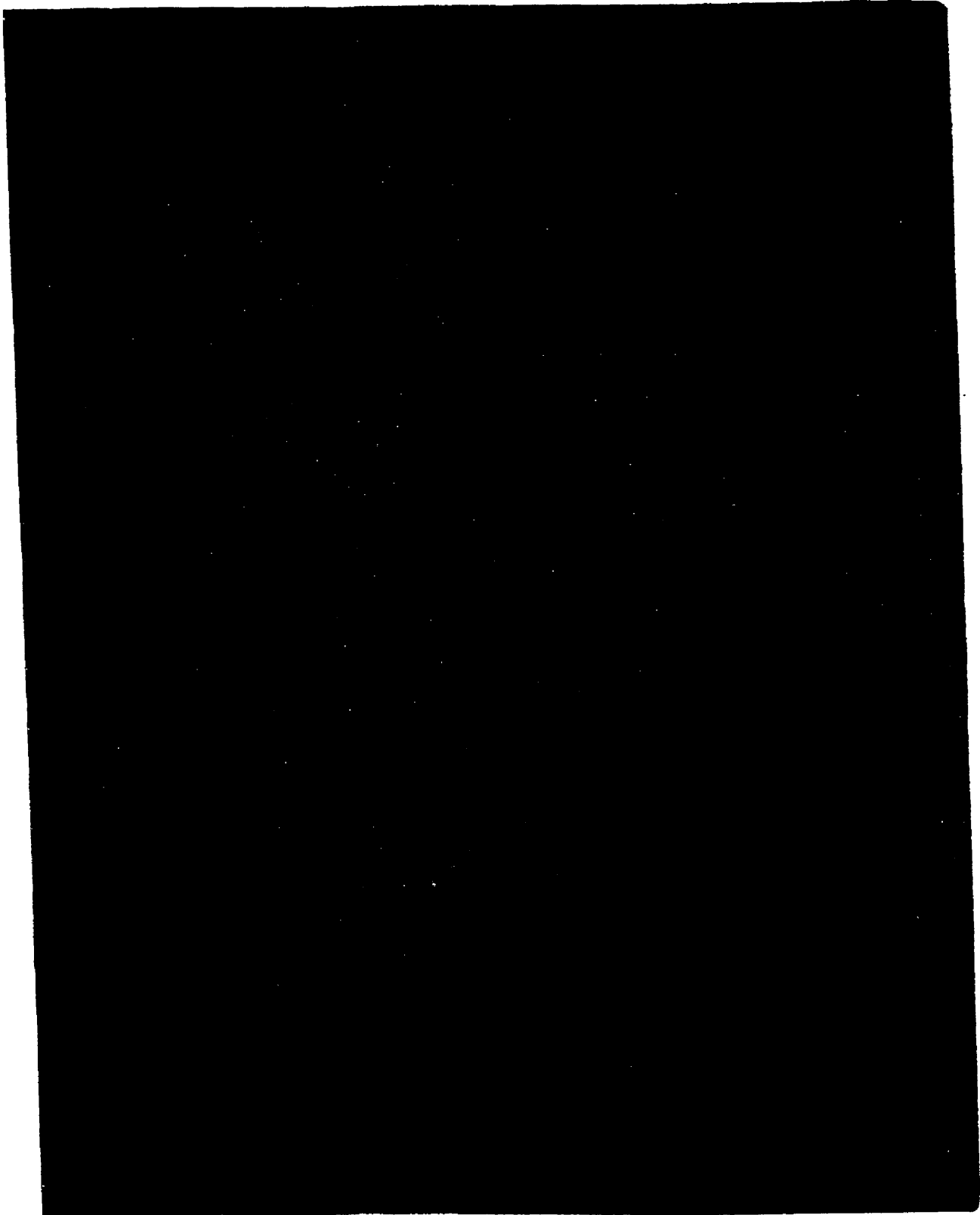


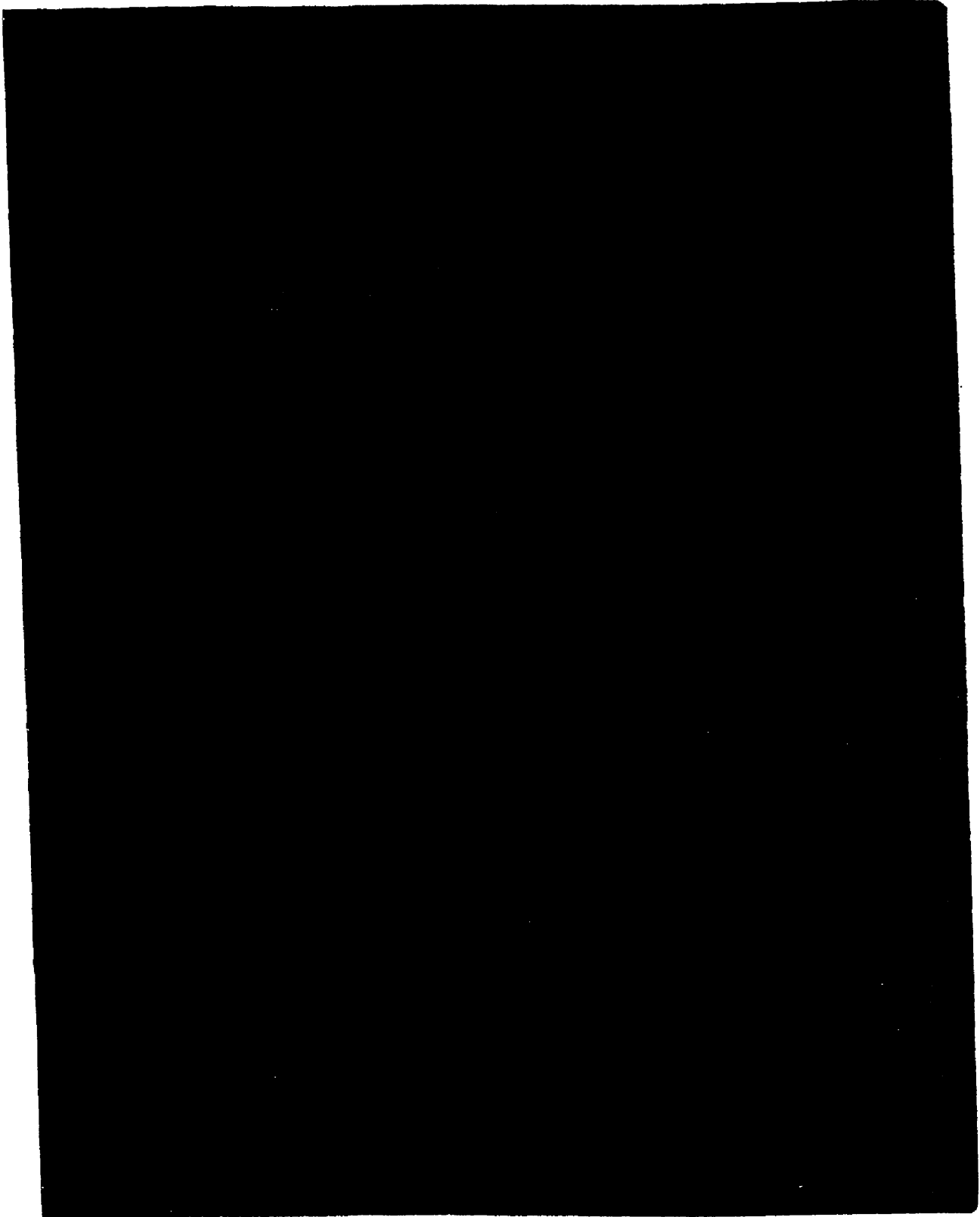
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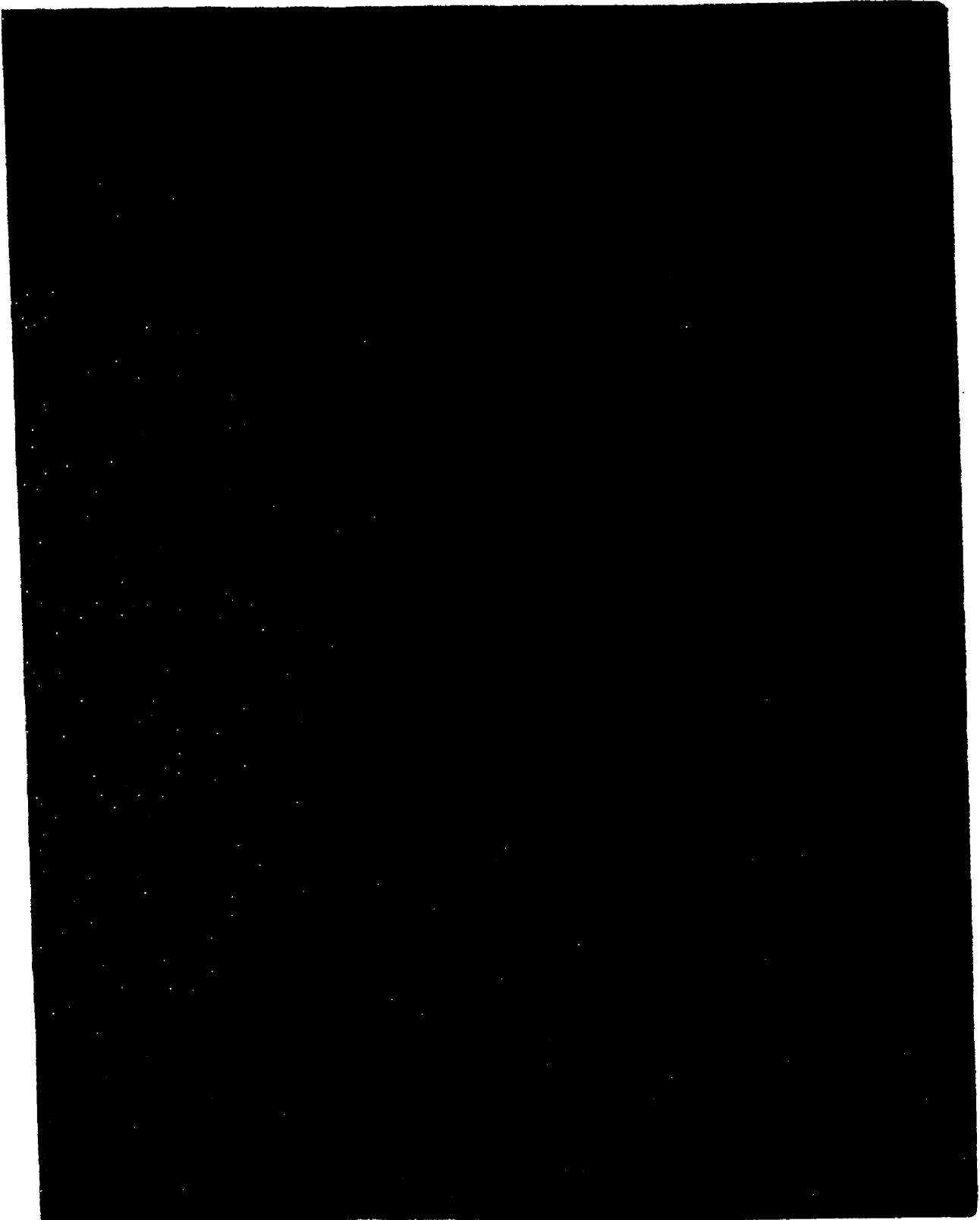


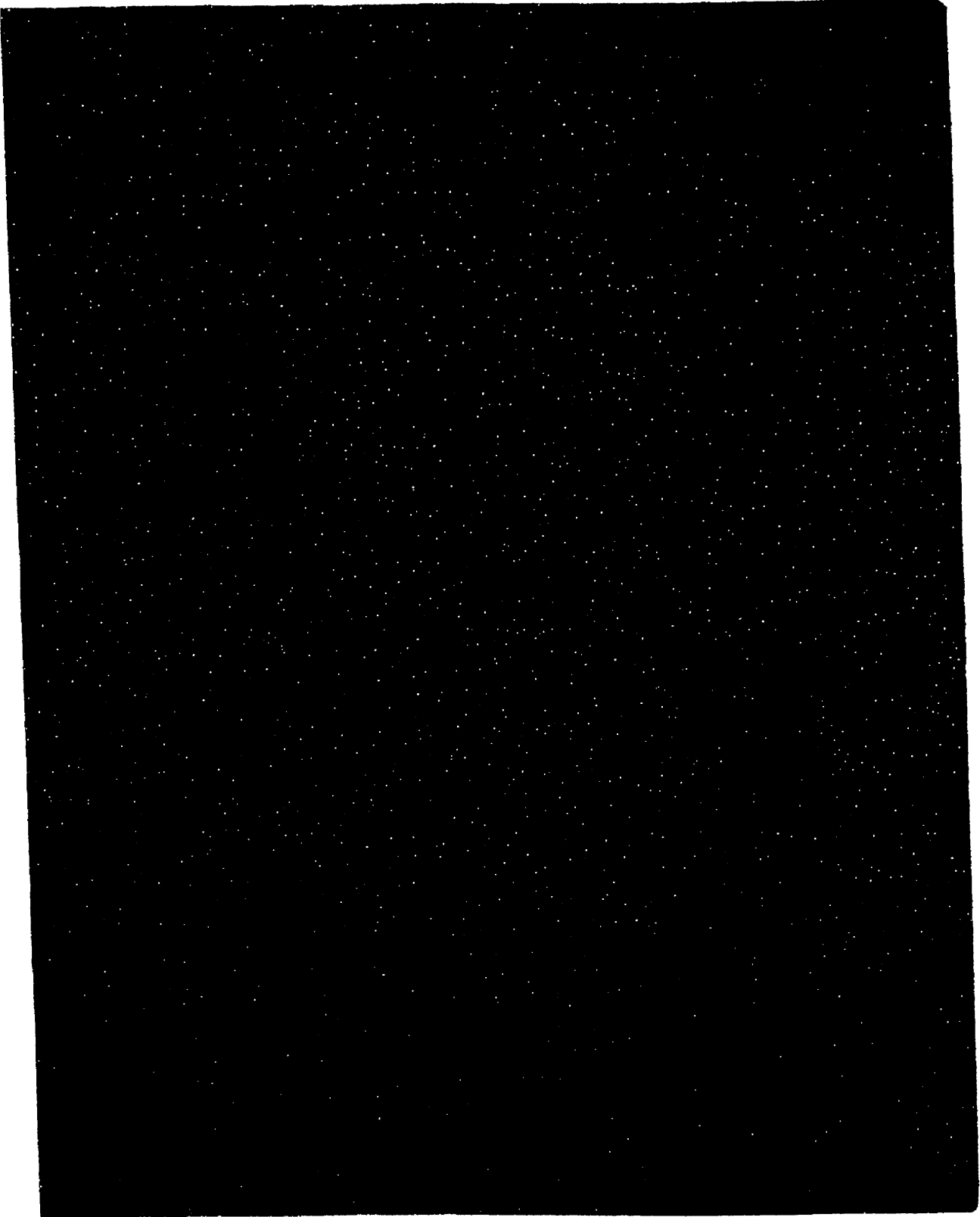


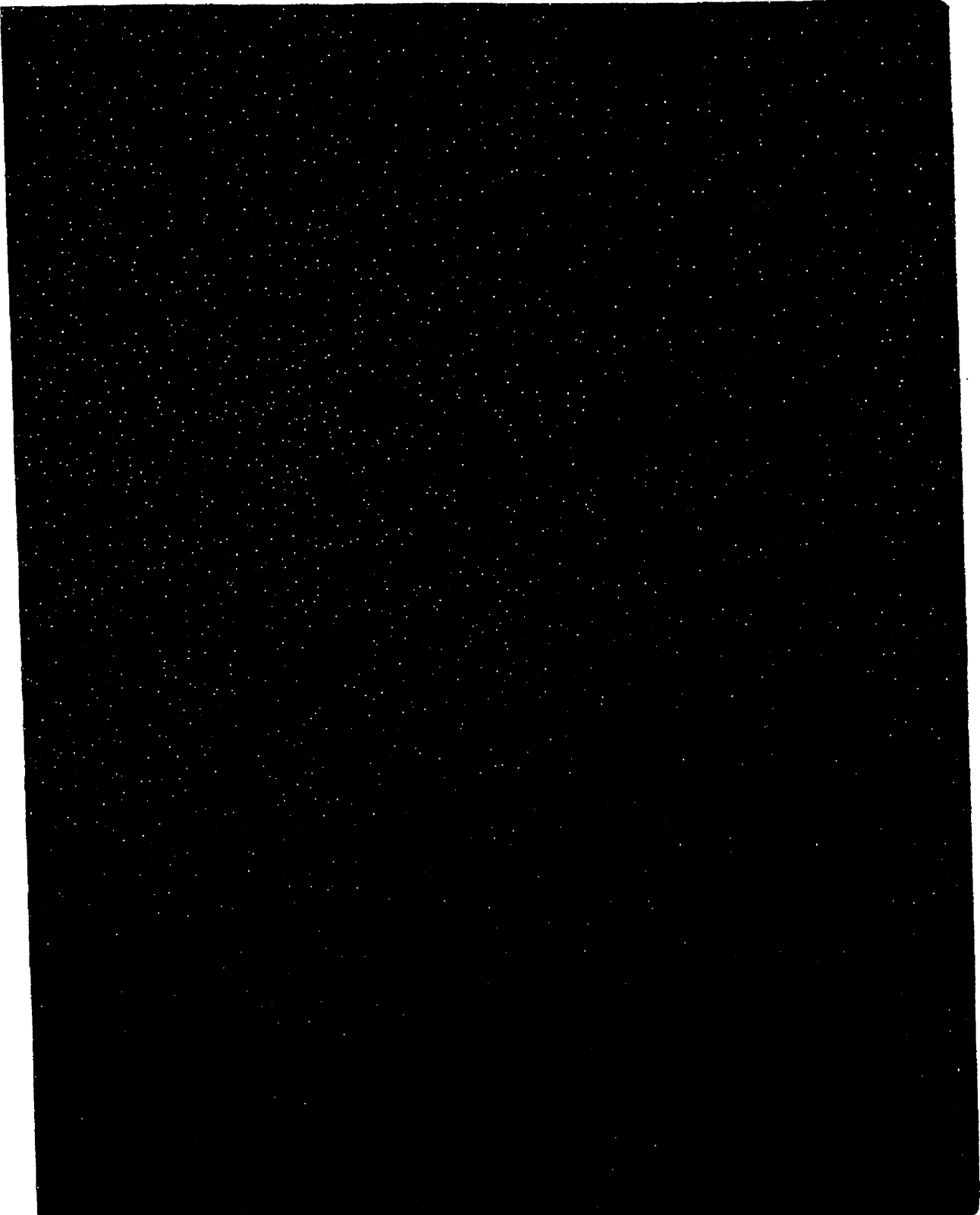
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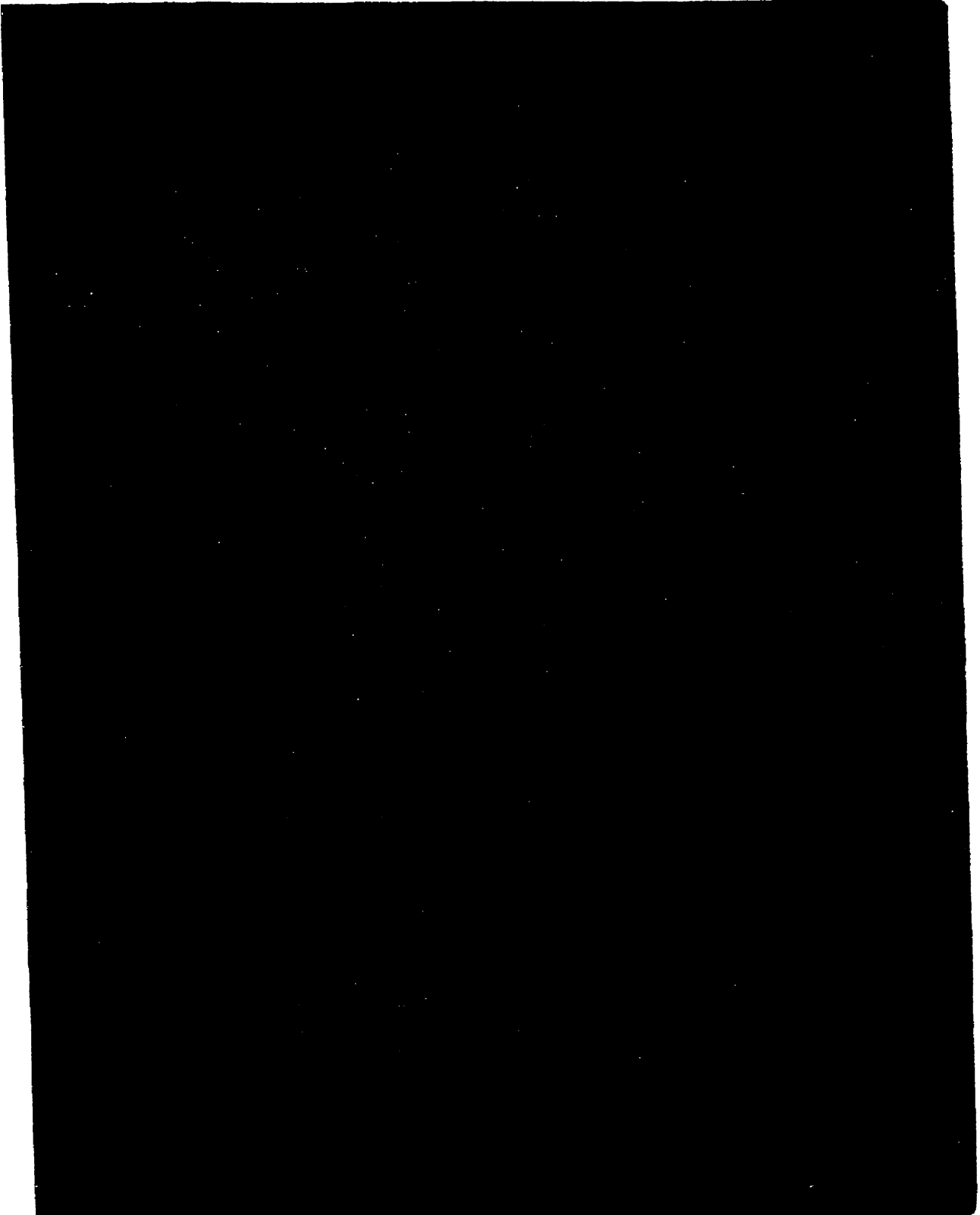




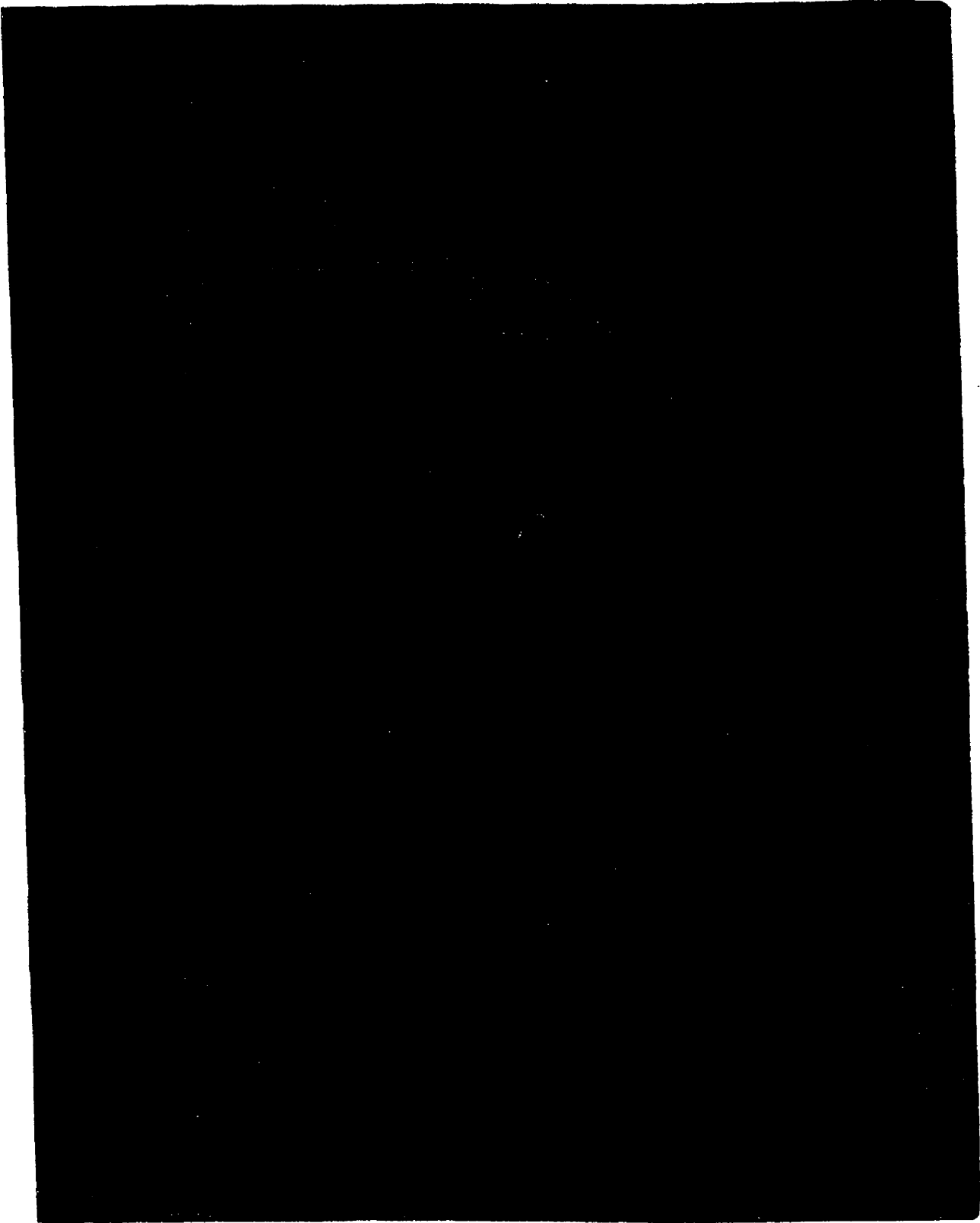


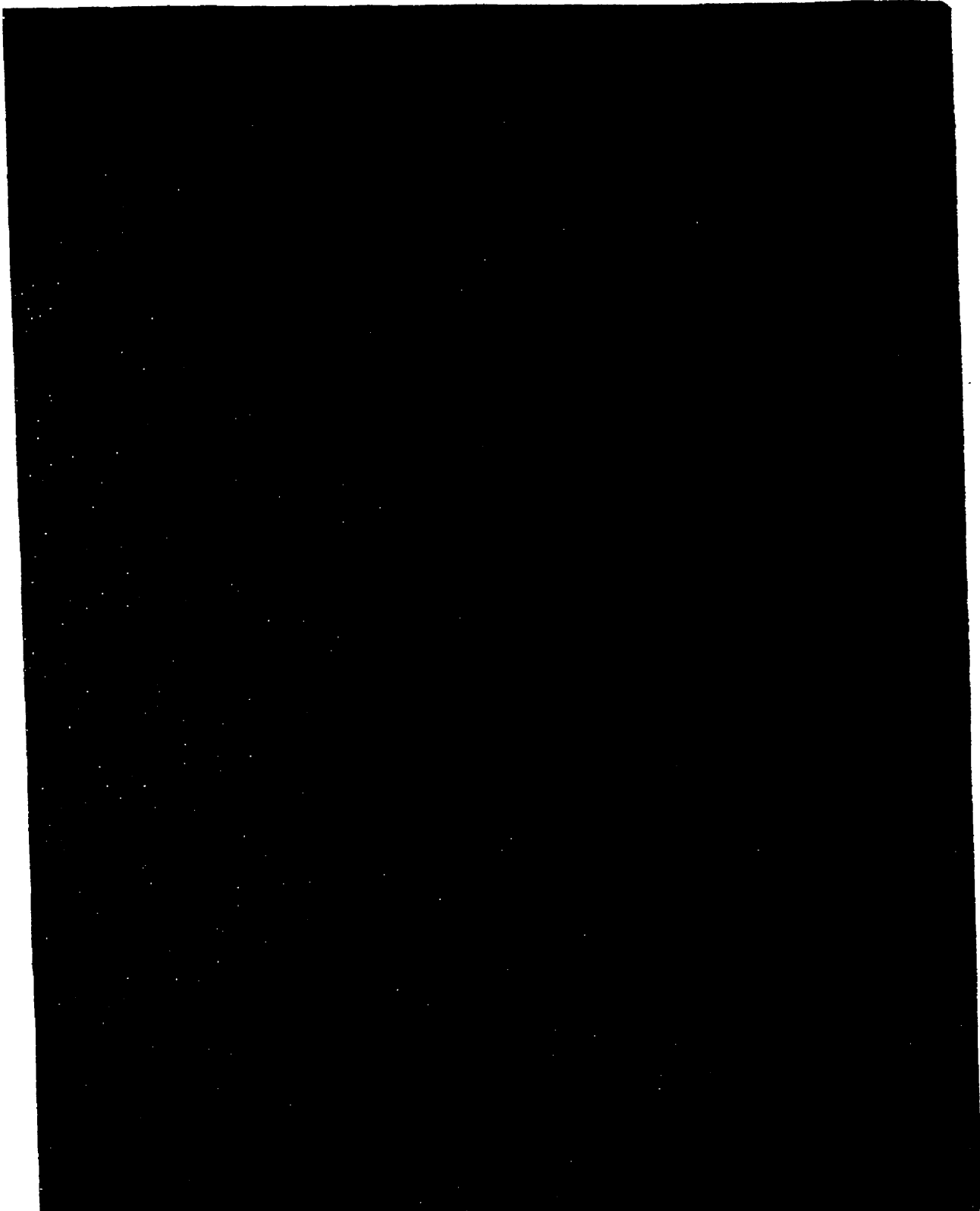


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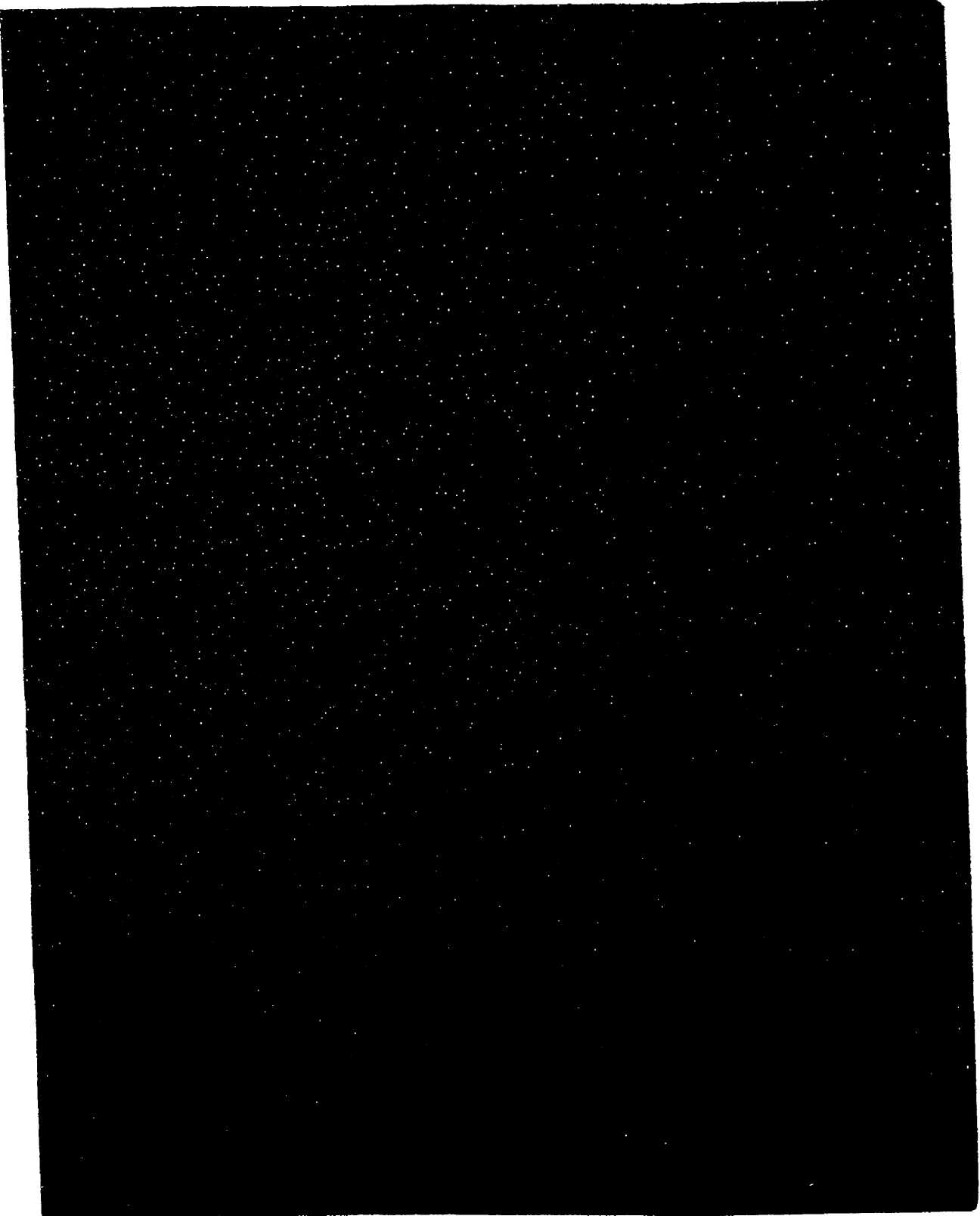


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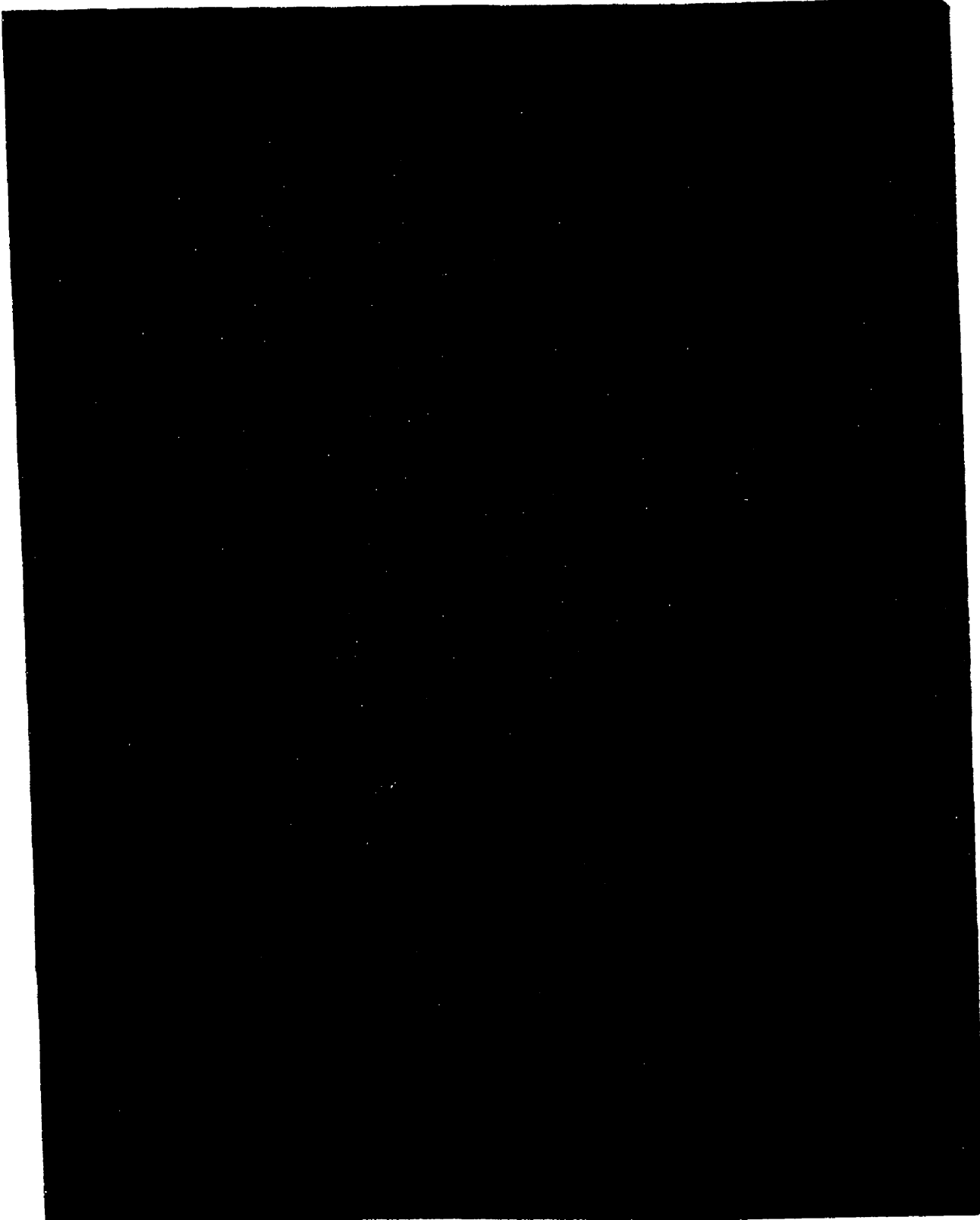




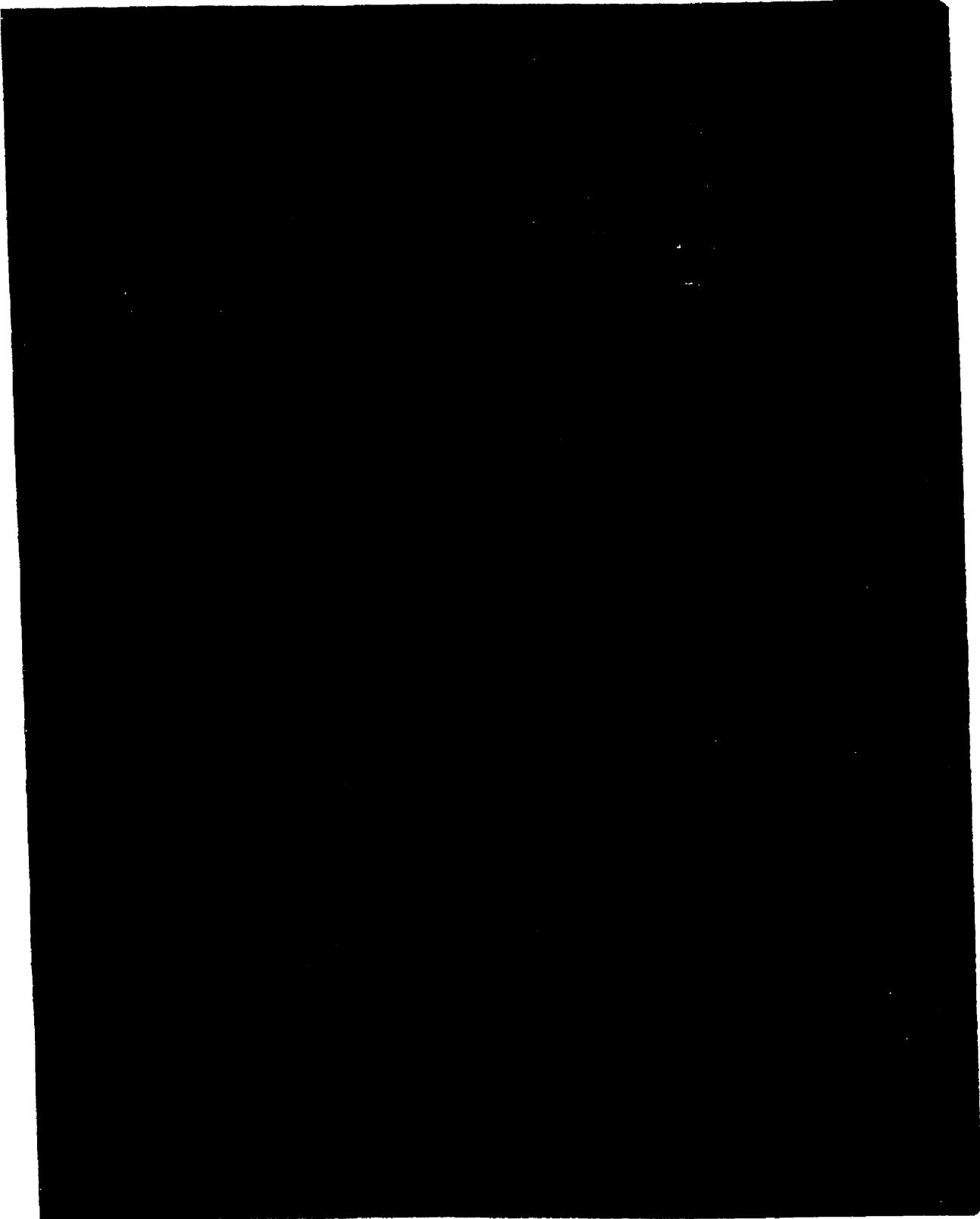
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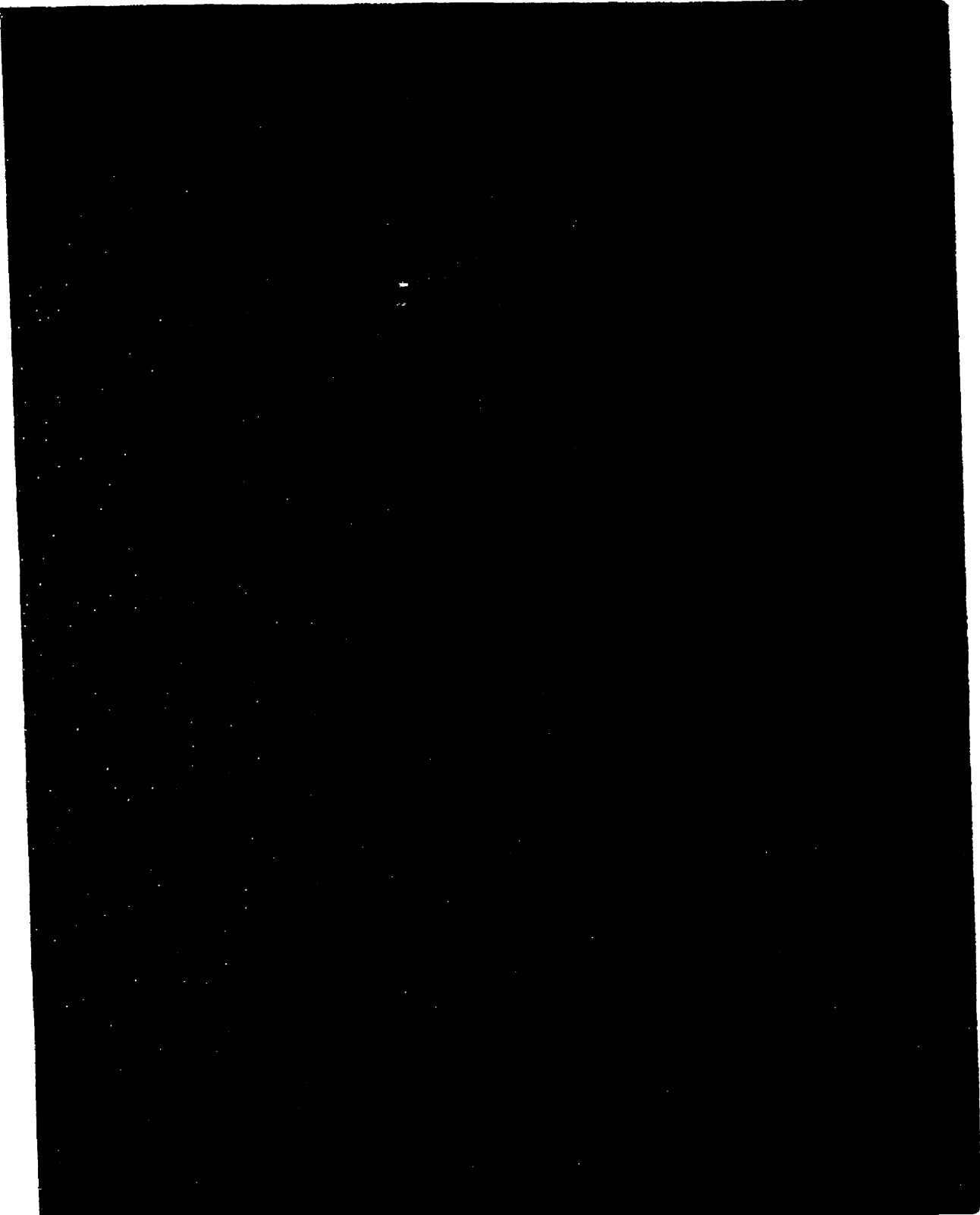


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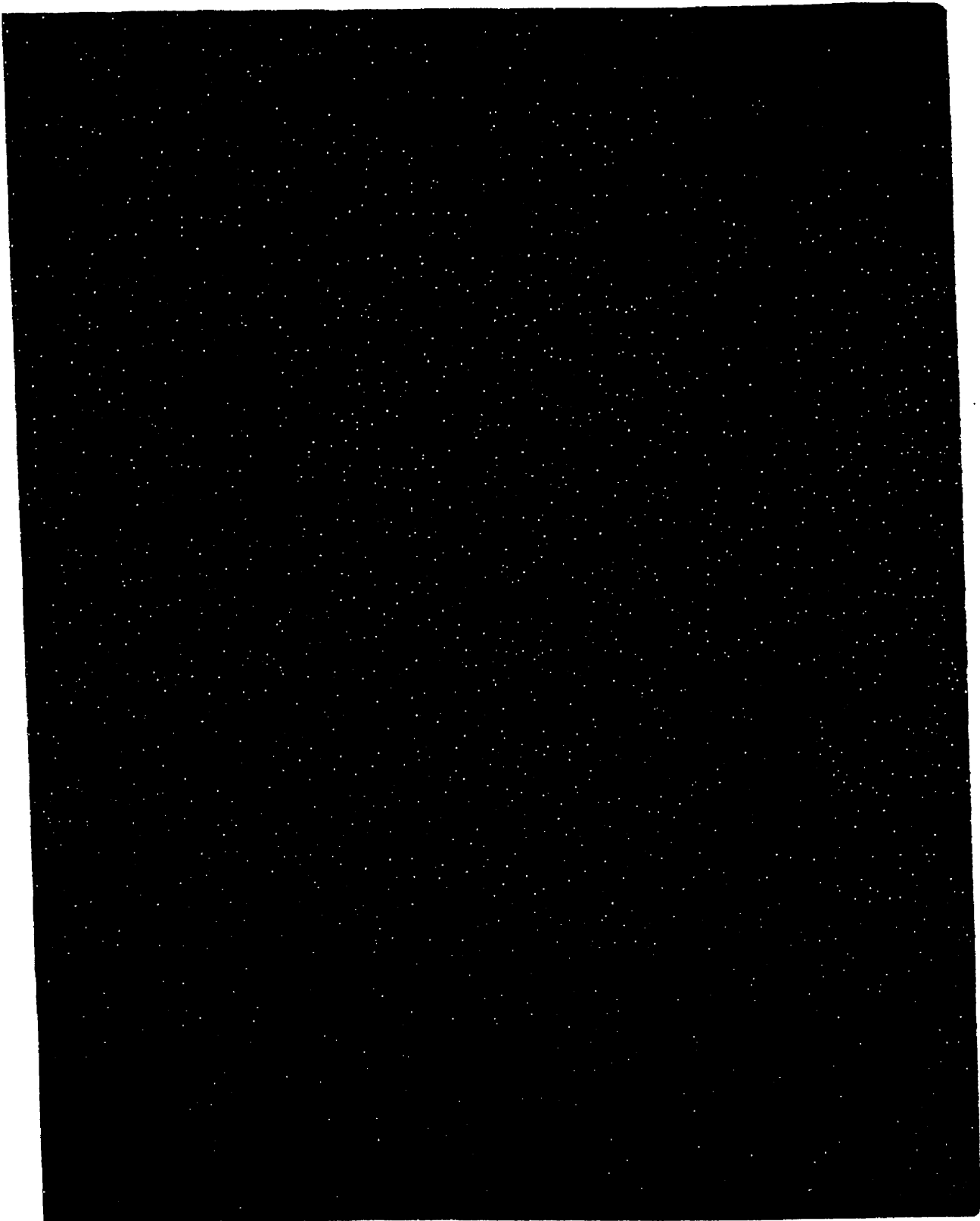


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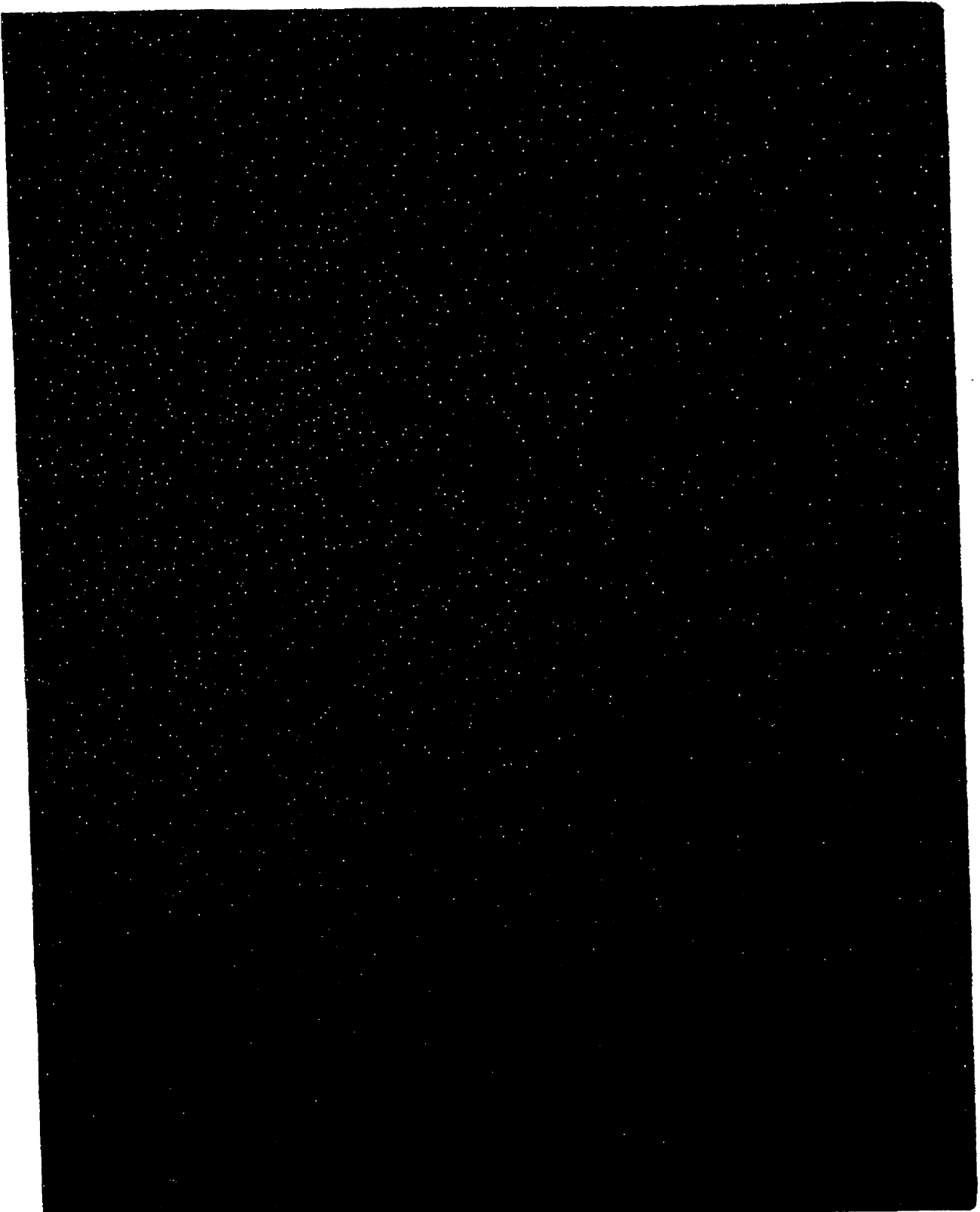


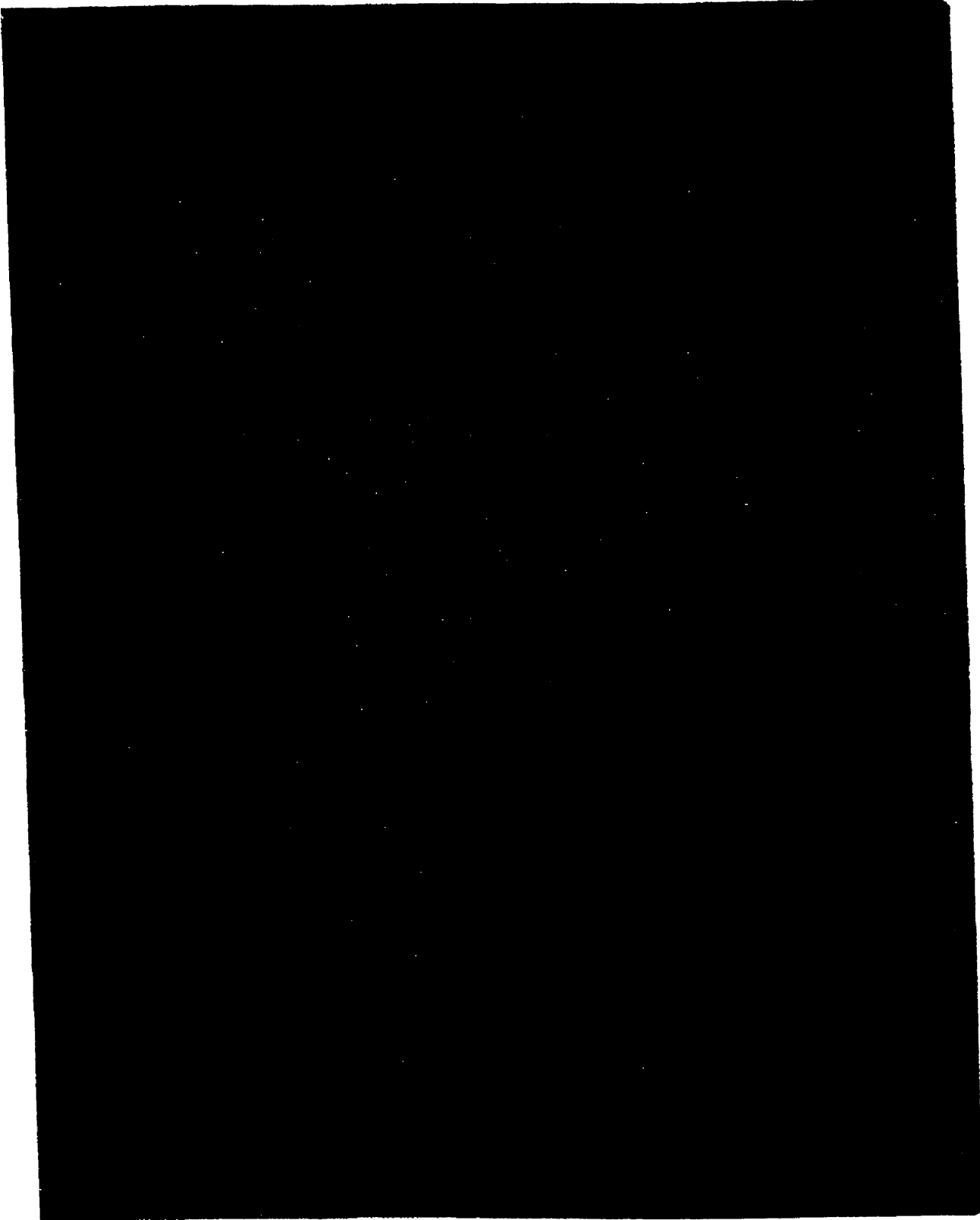


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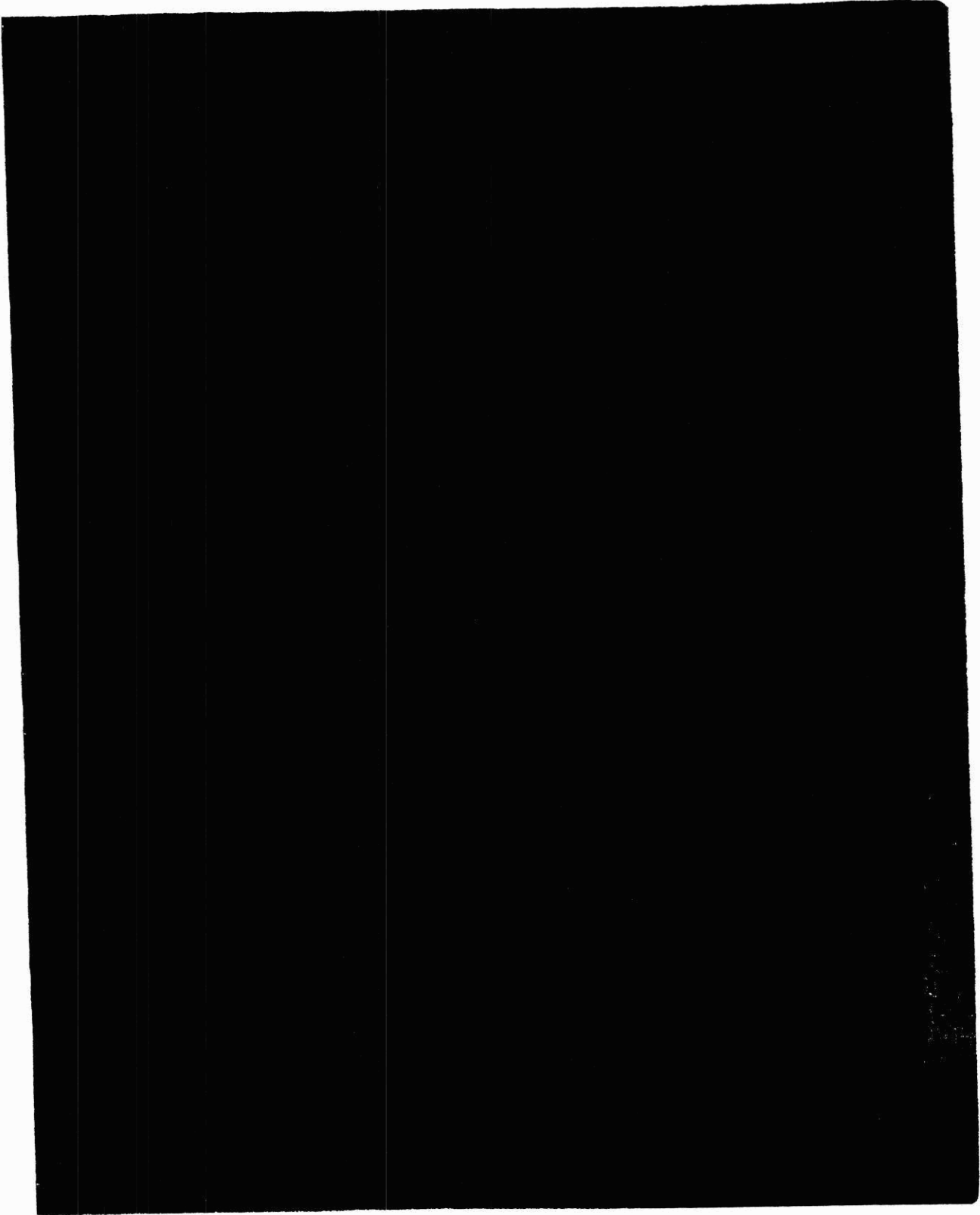


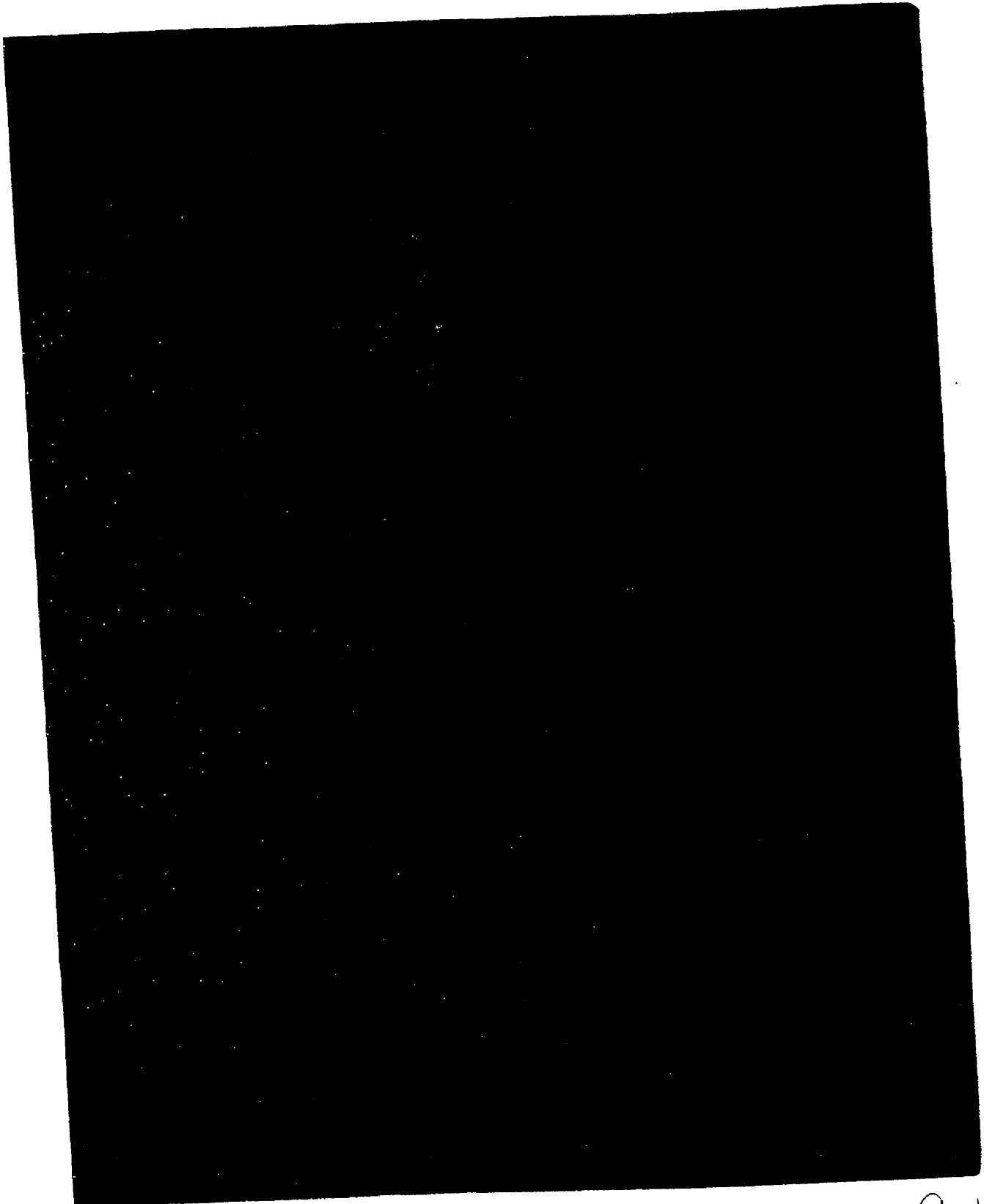
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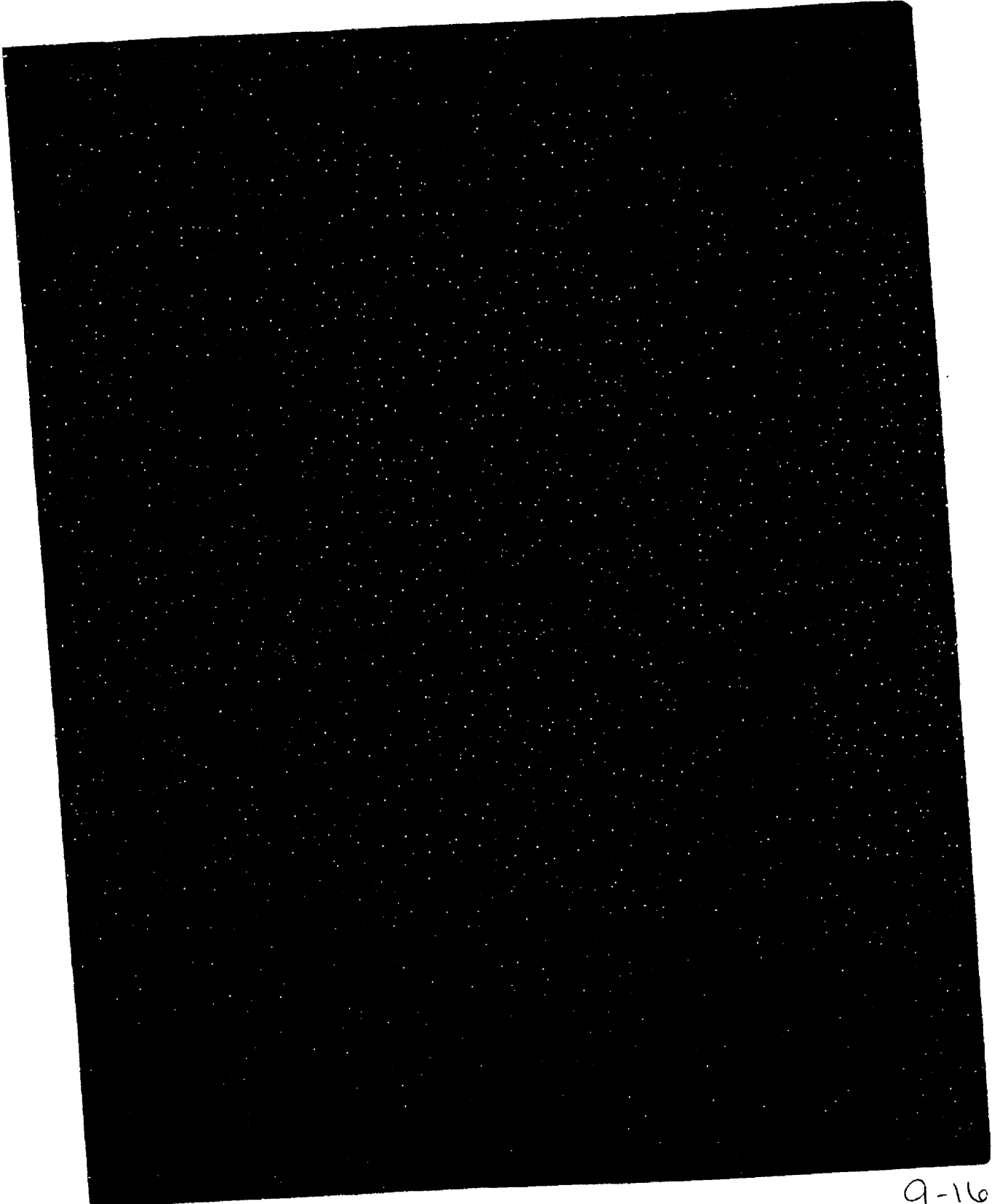




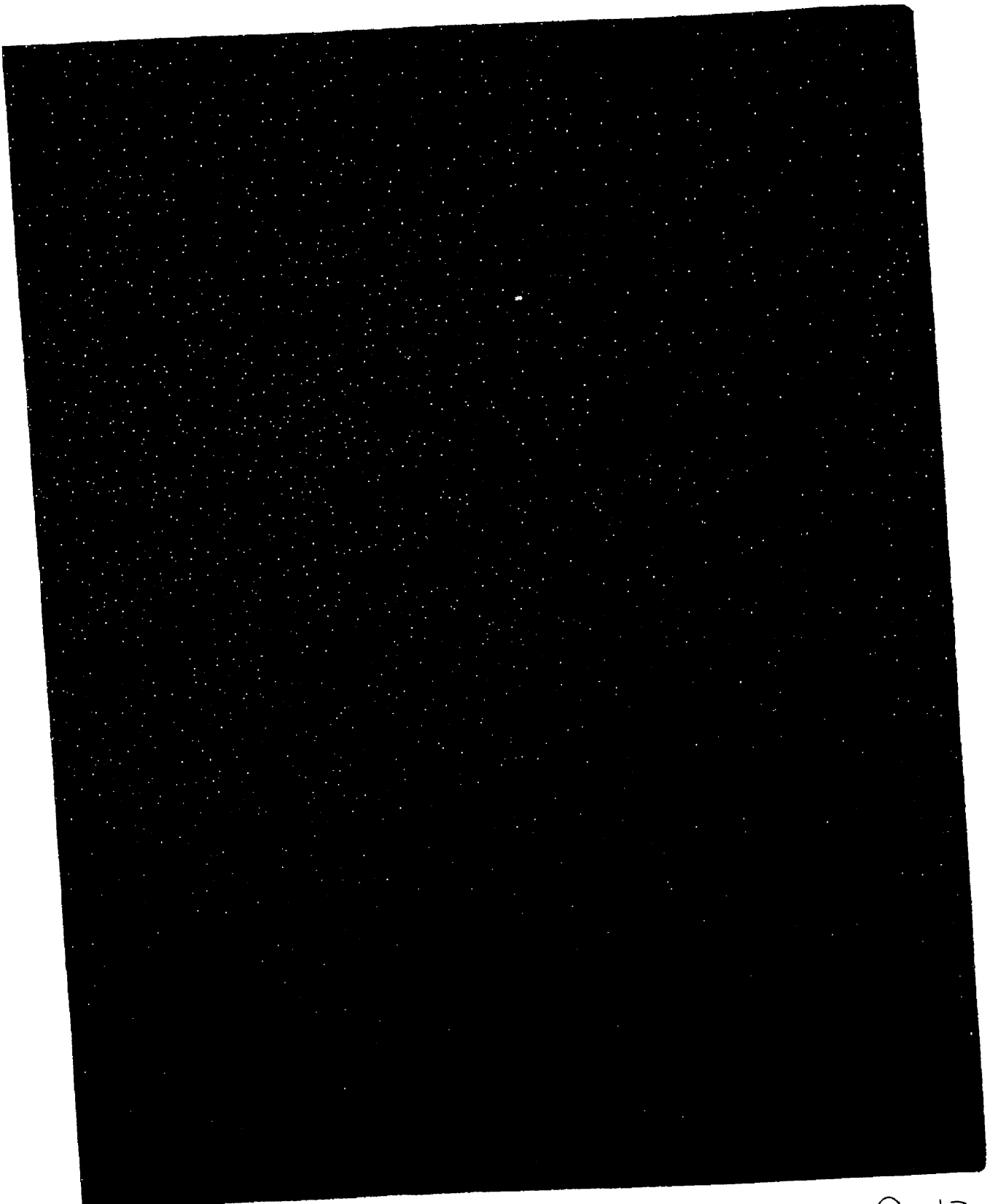
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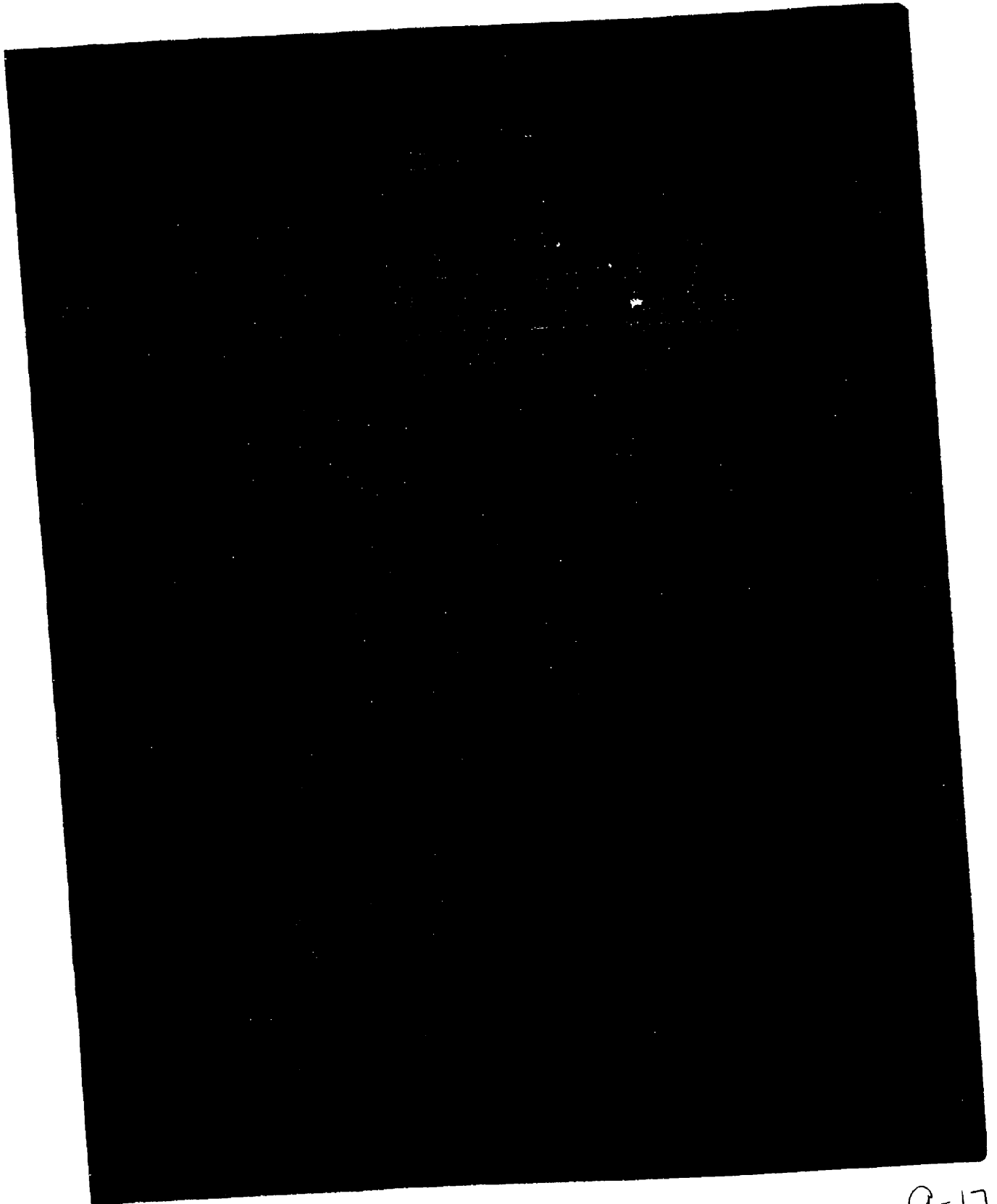




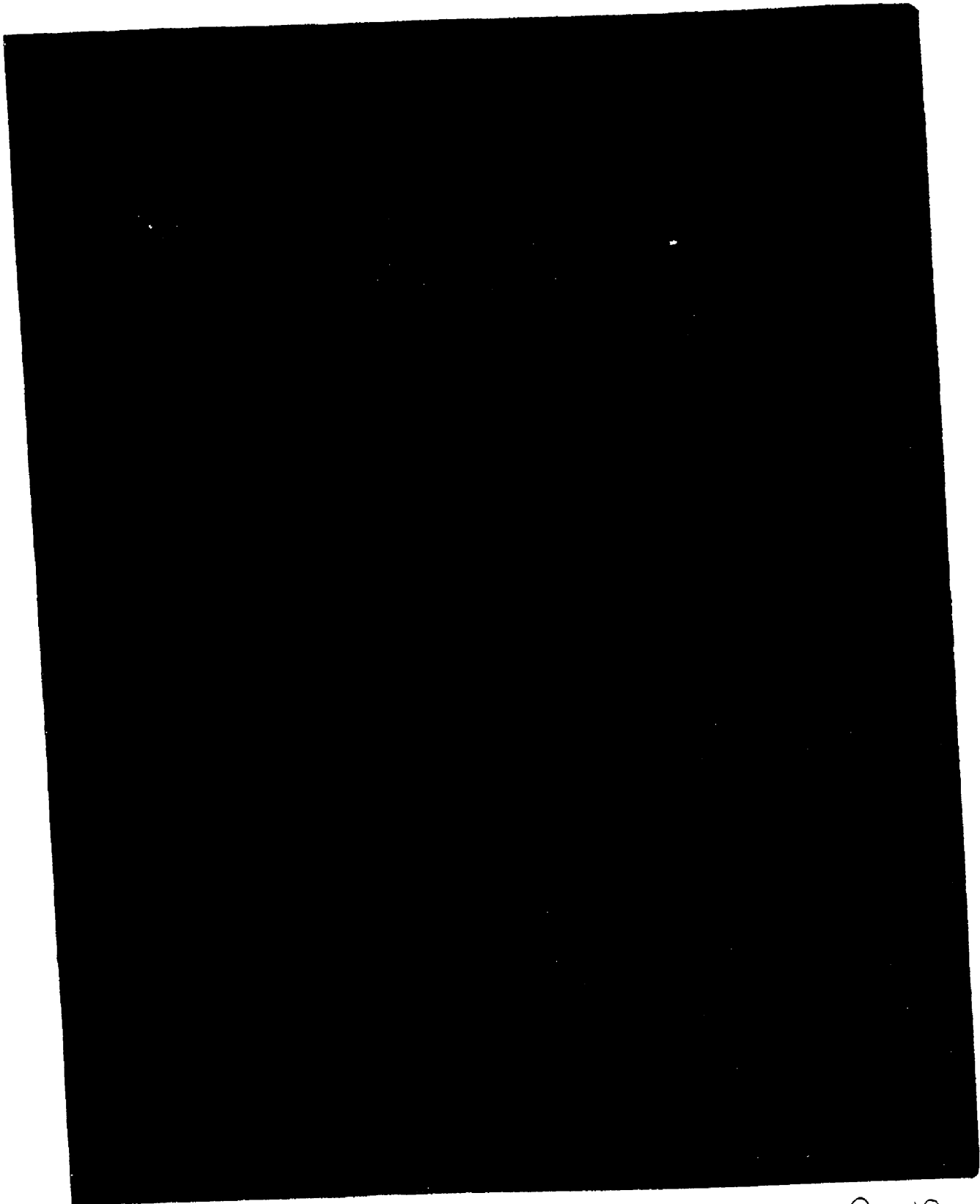


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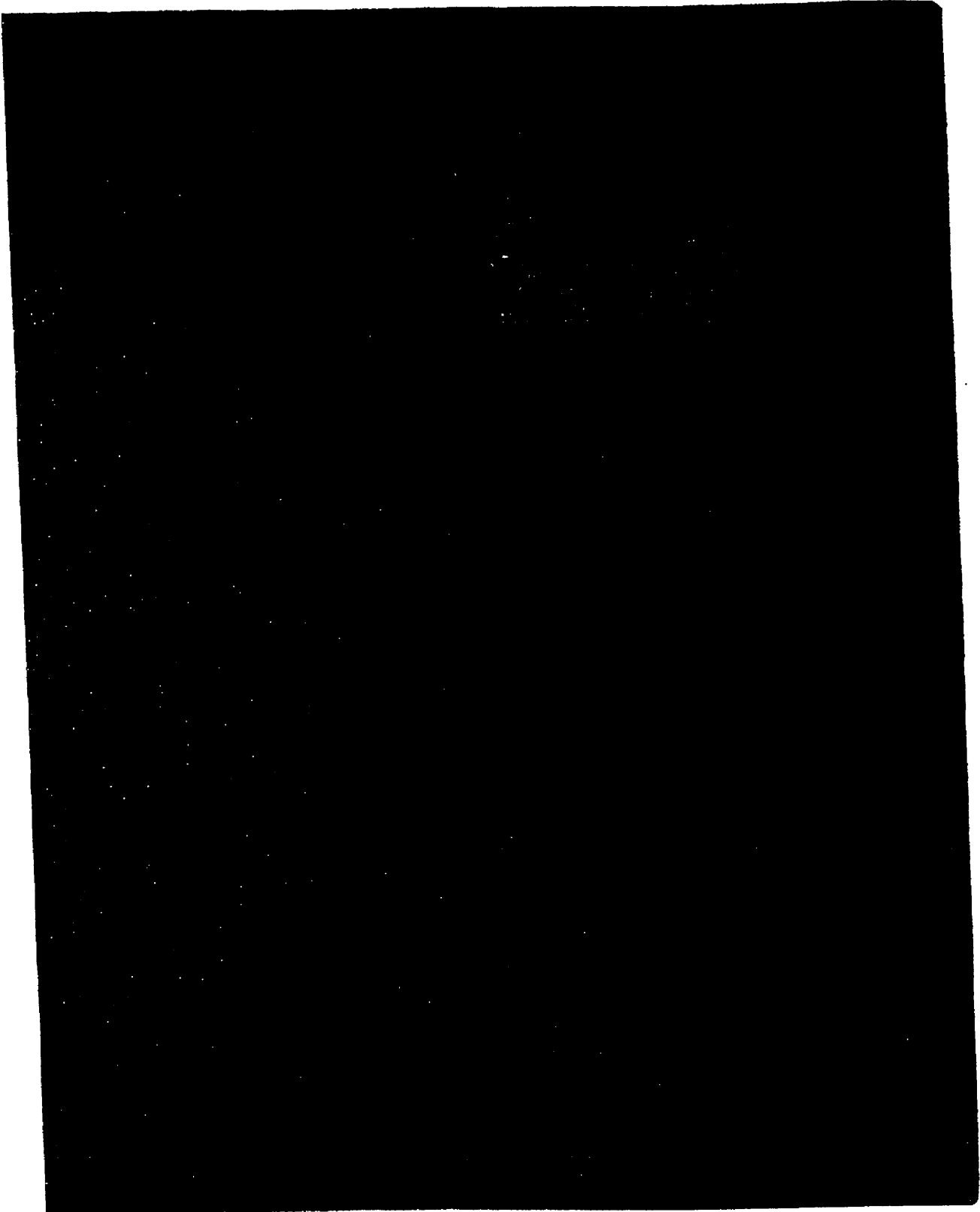


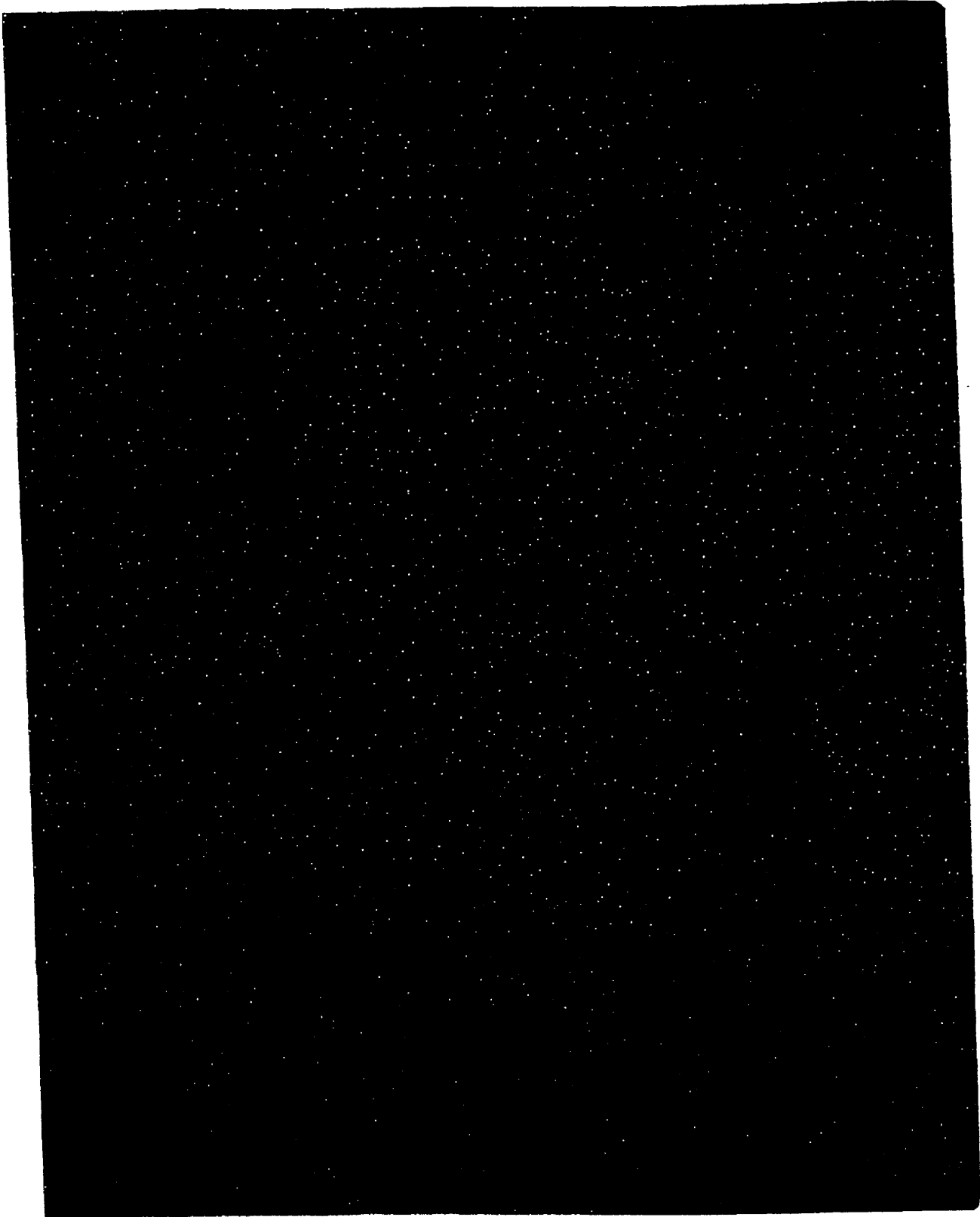


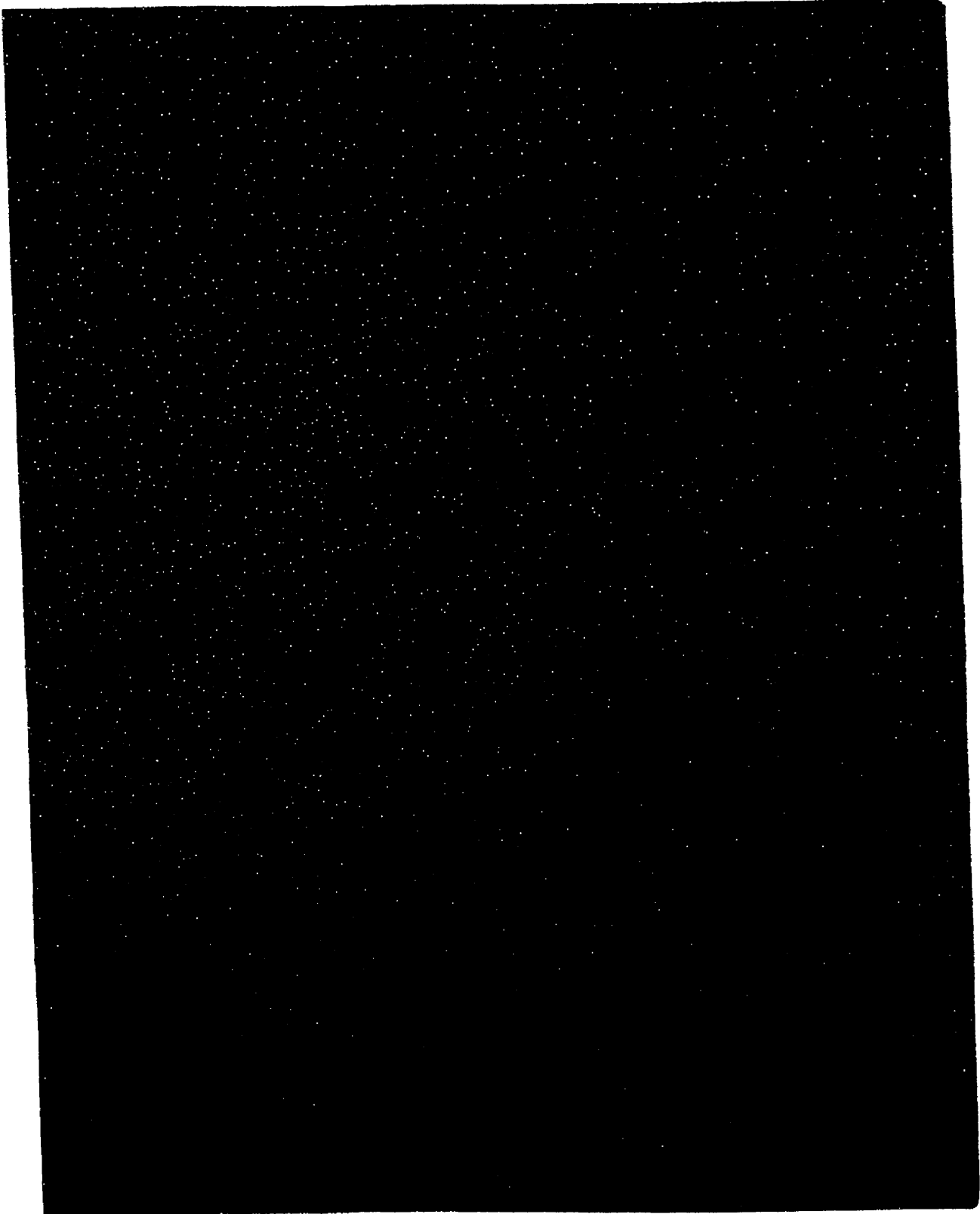
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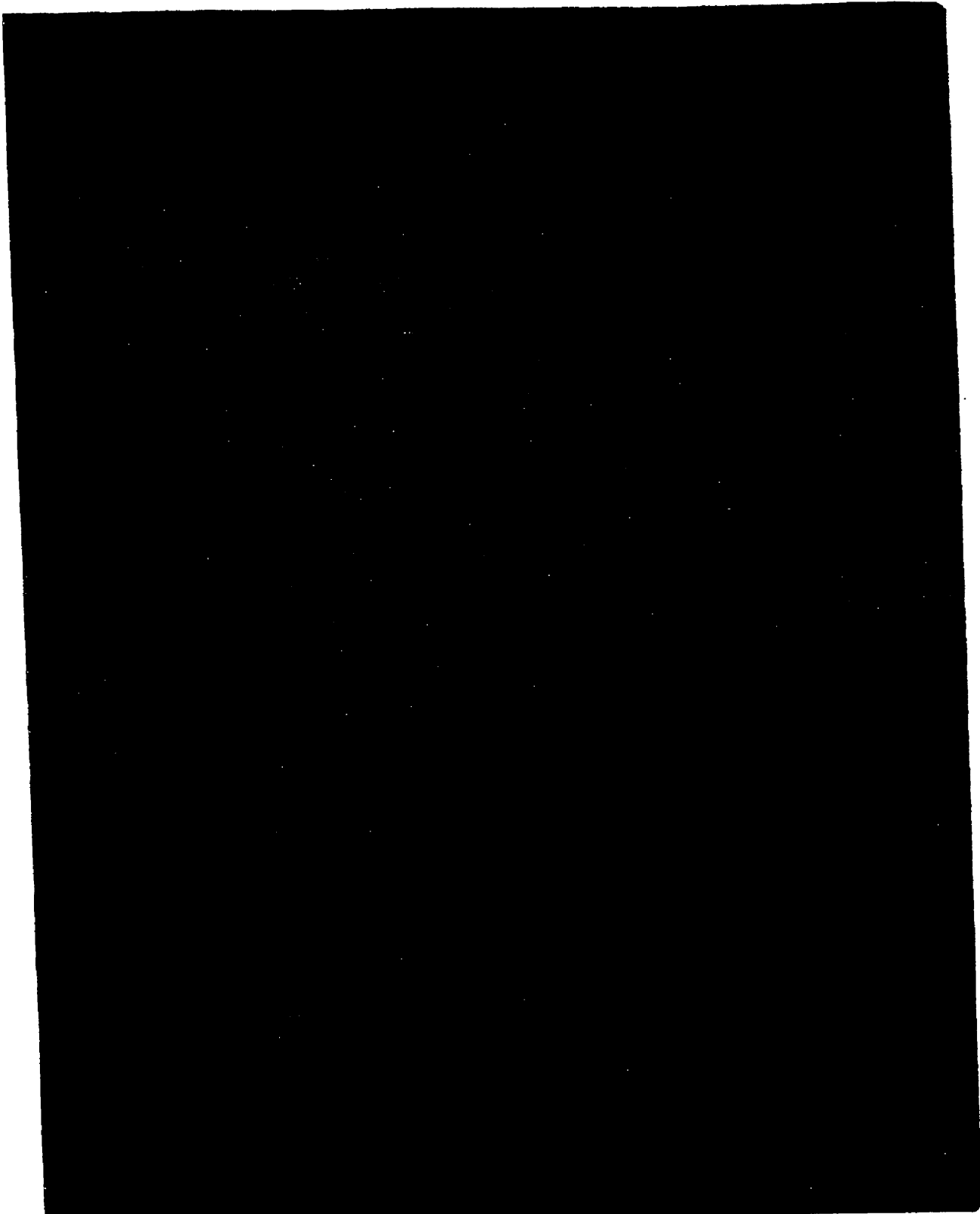
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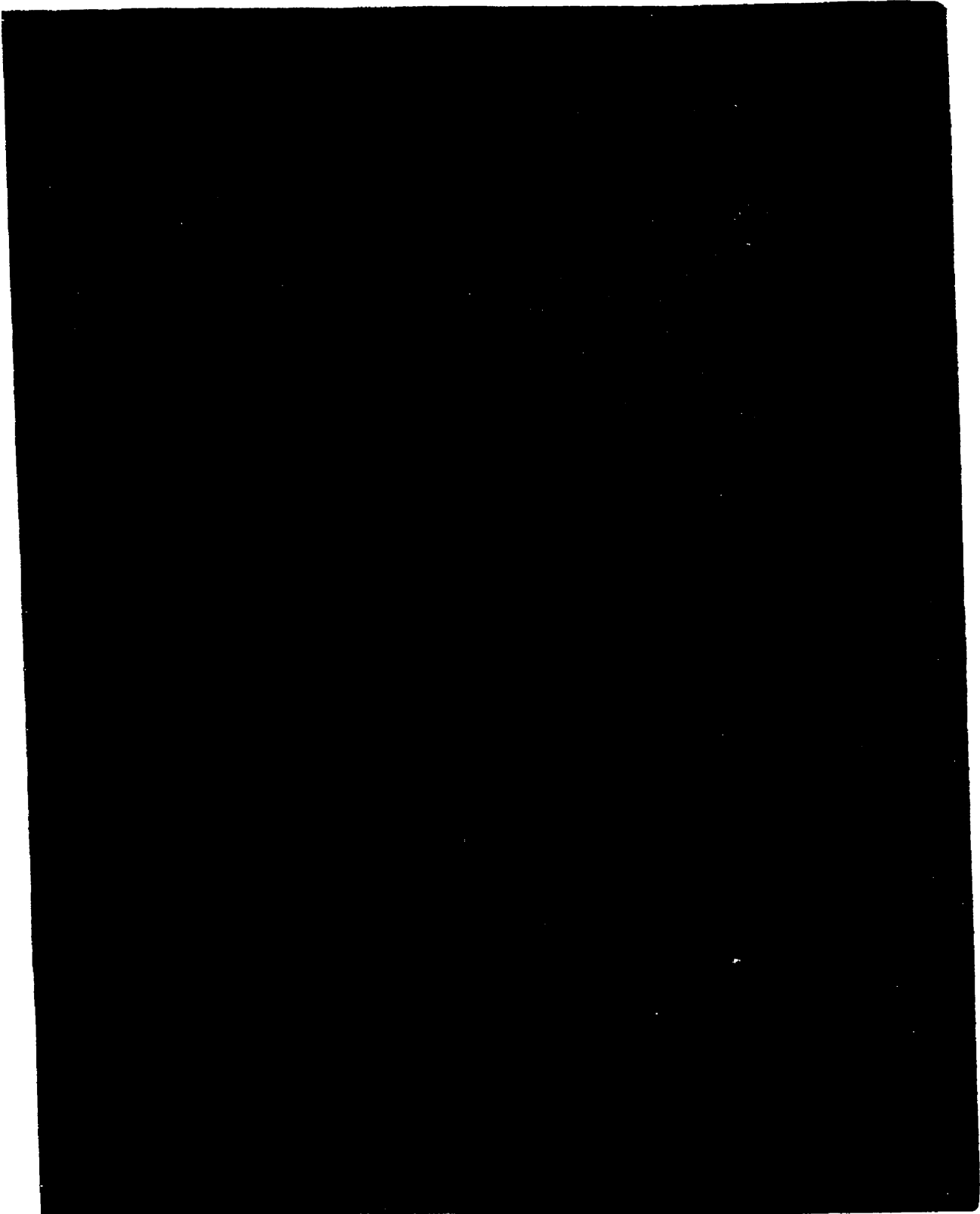




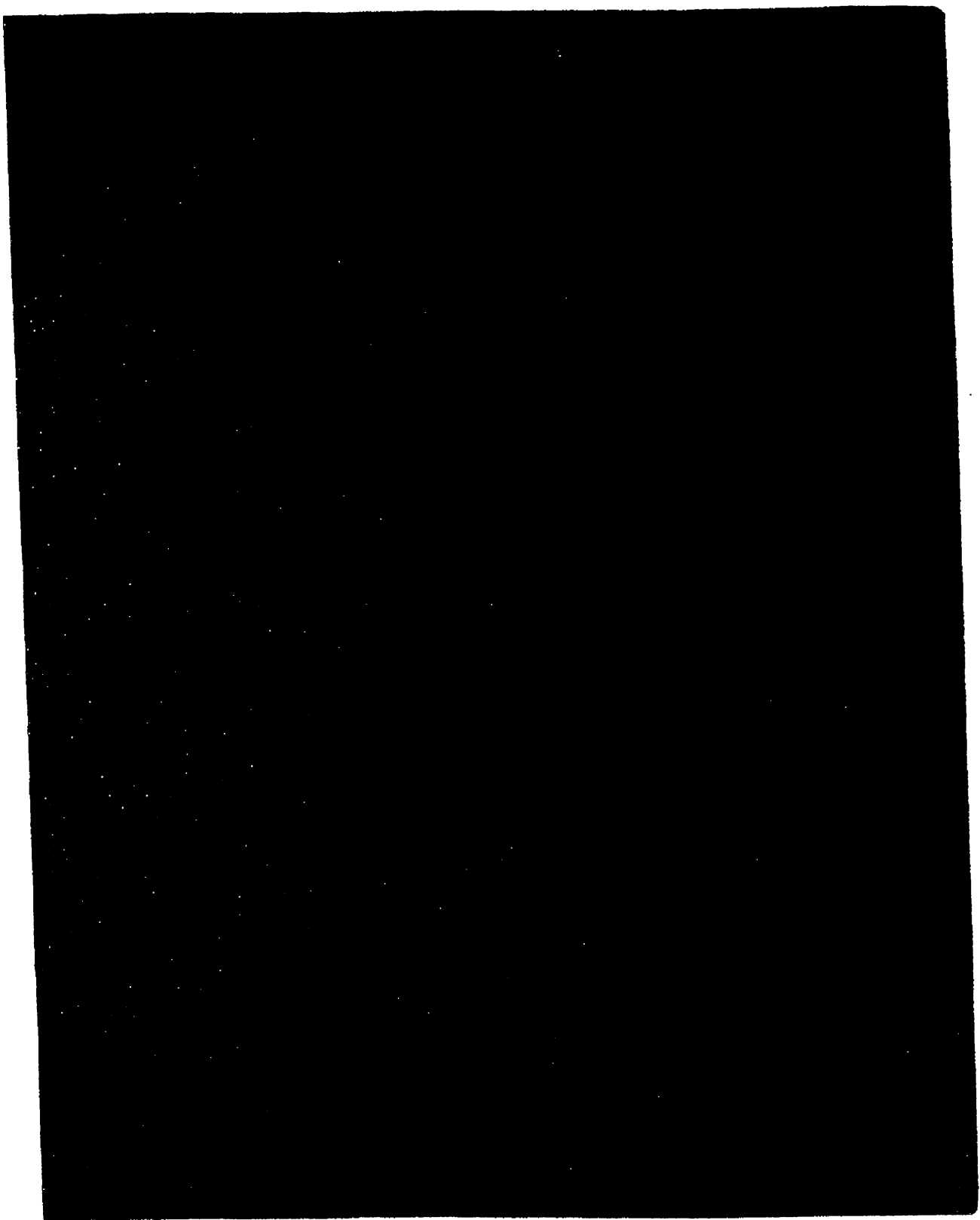


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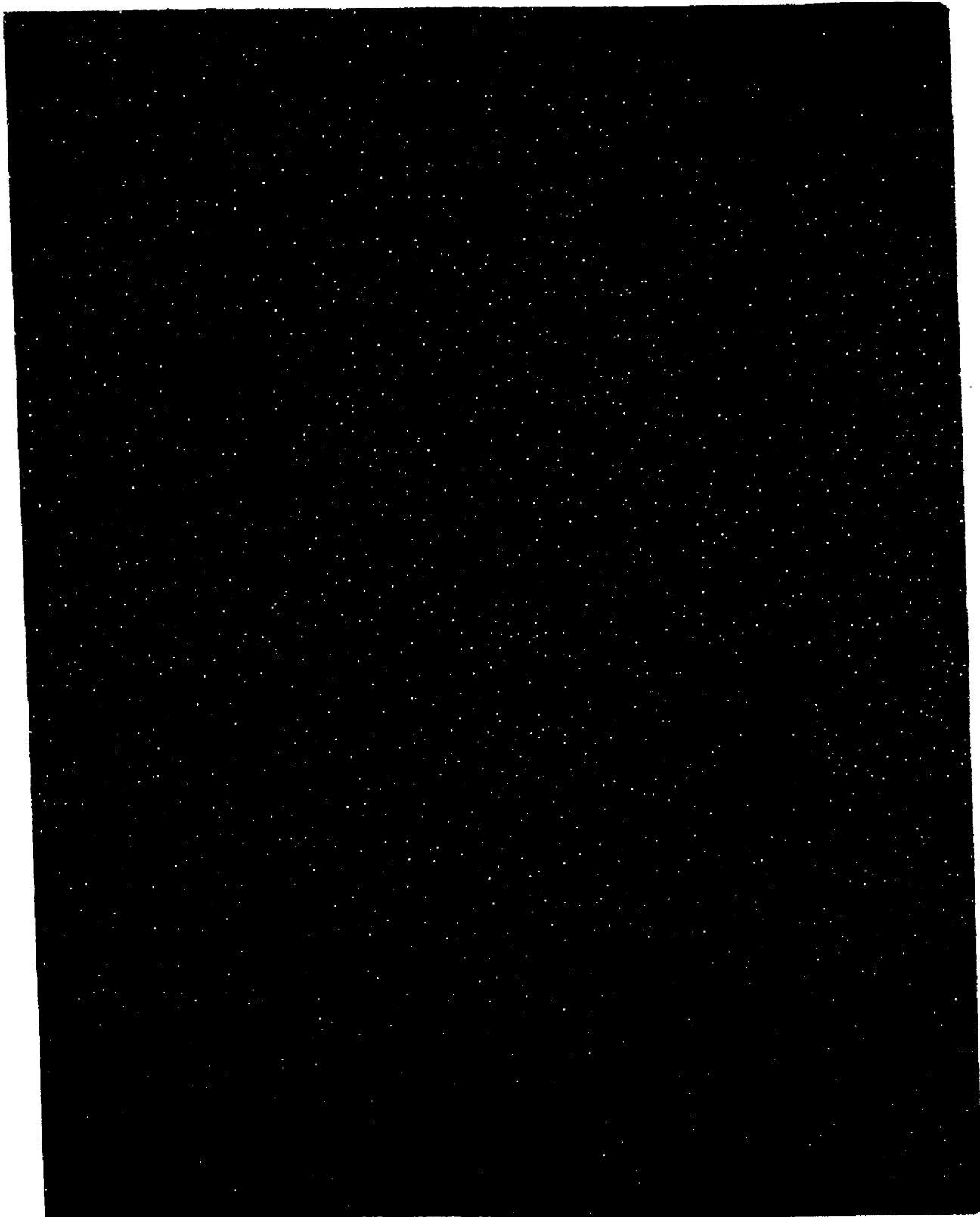




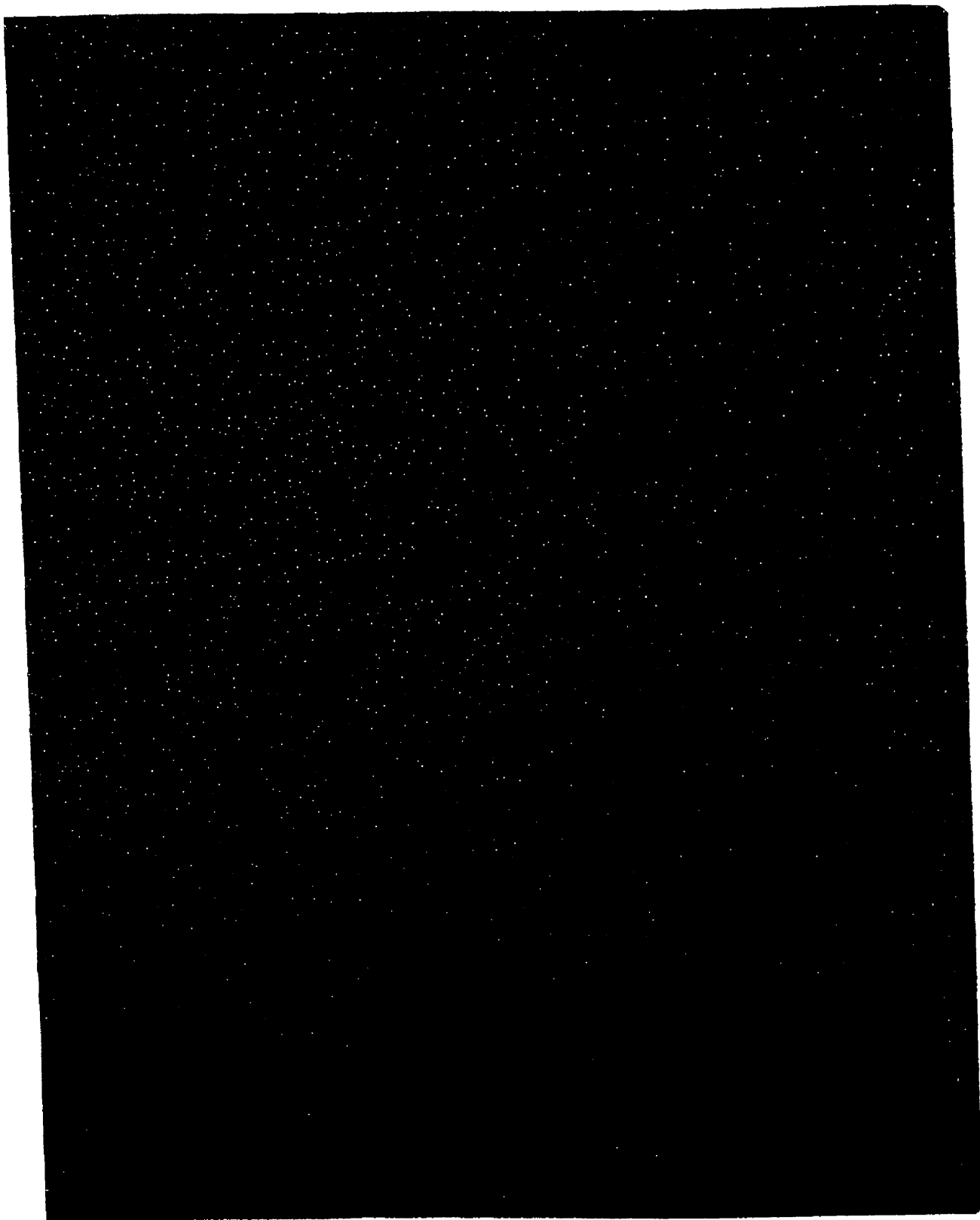
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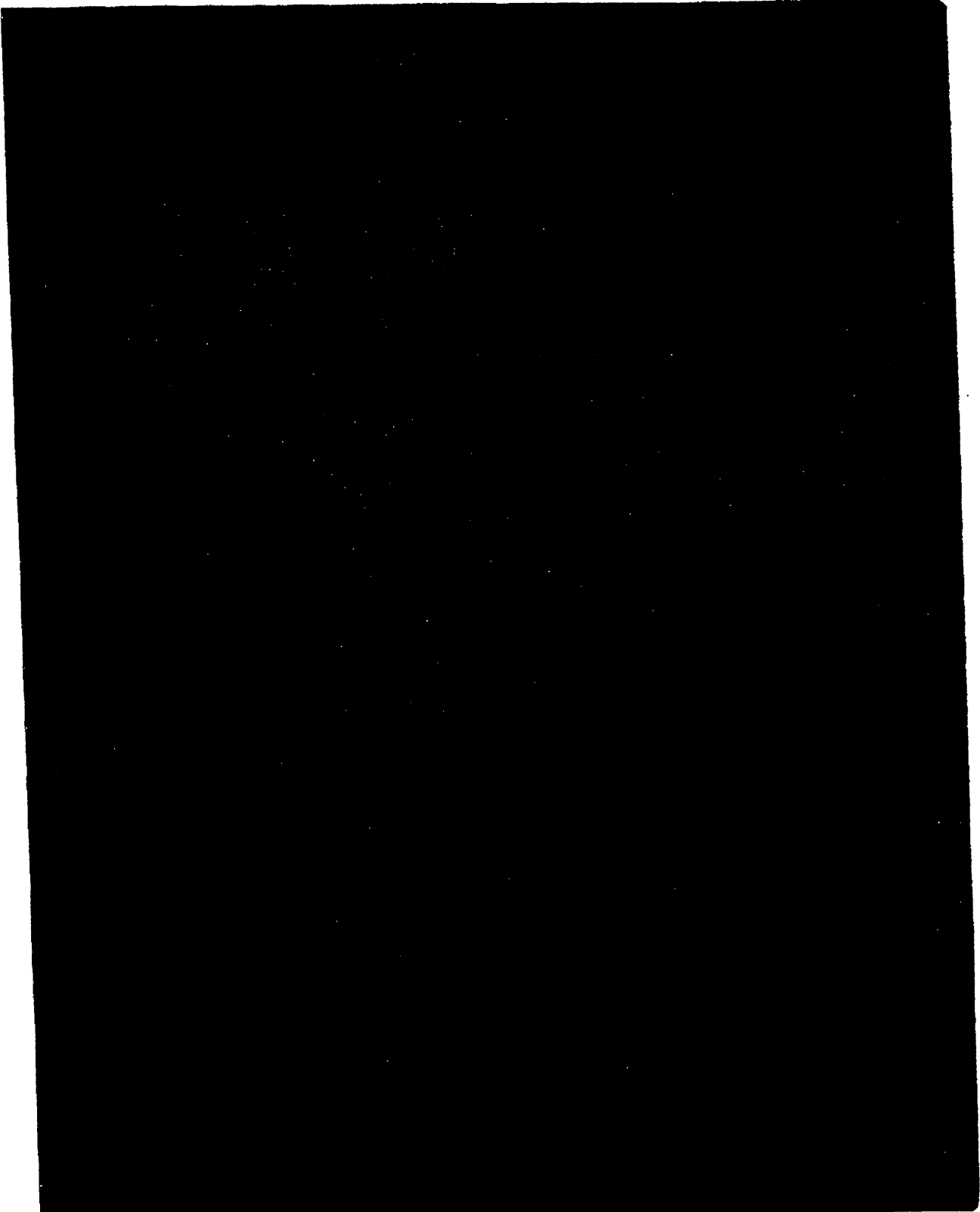
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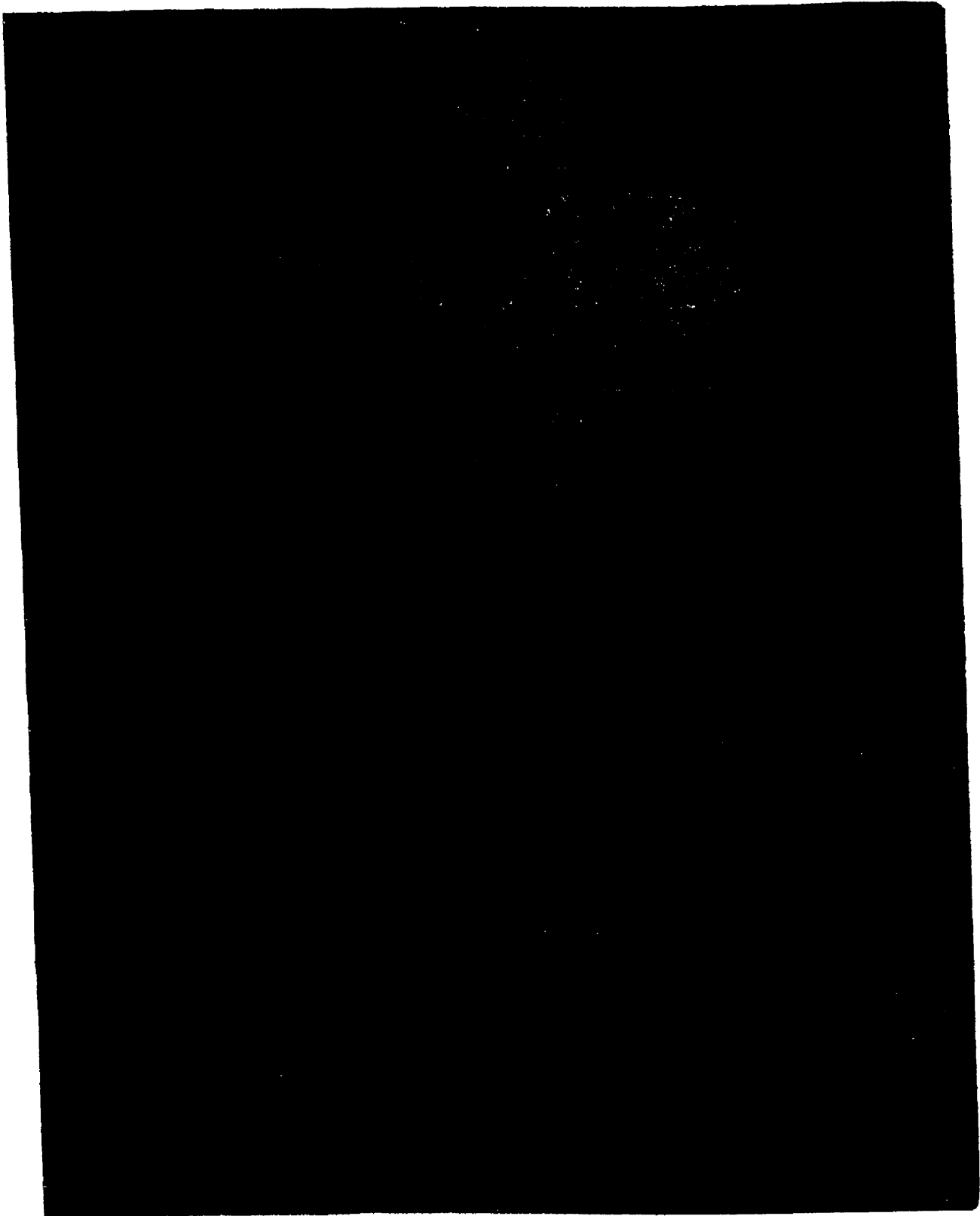


9-20
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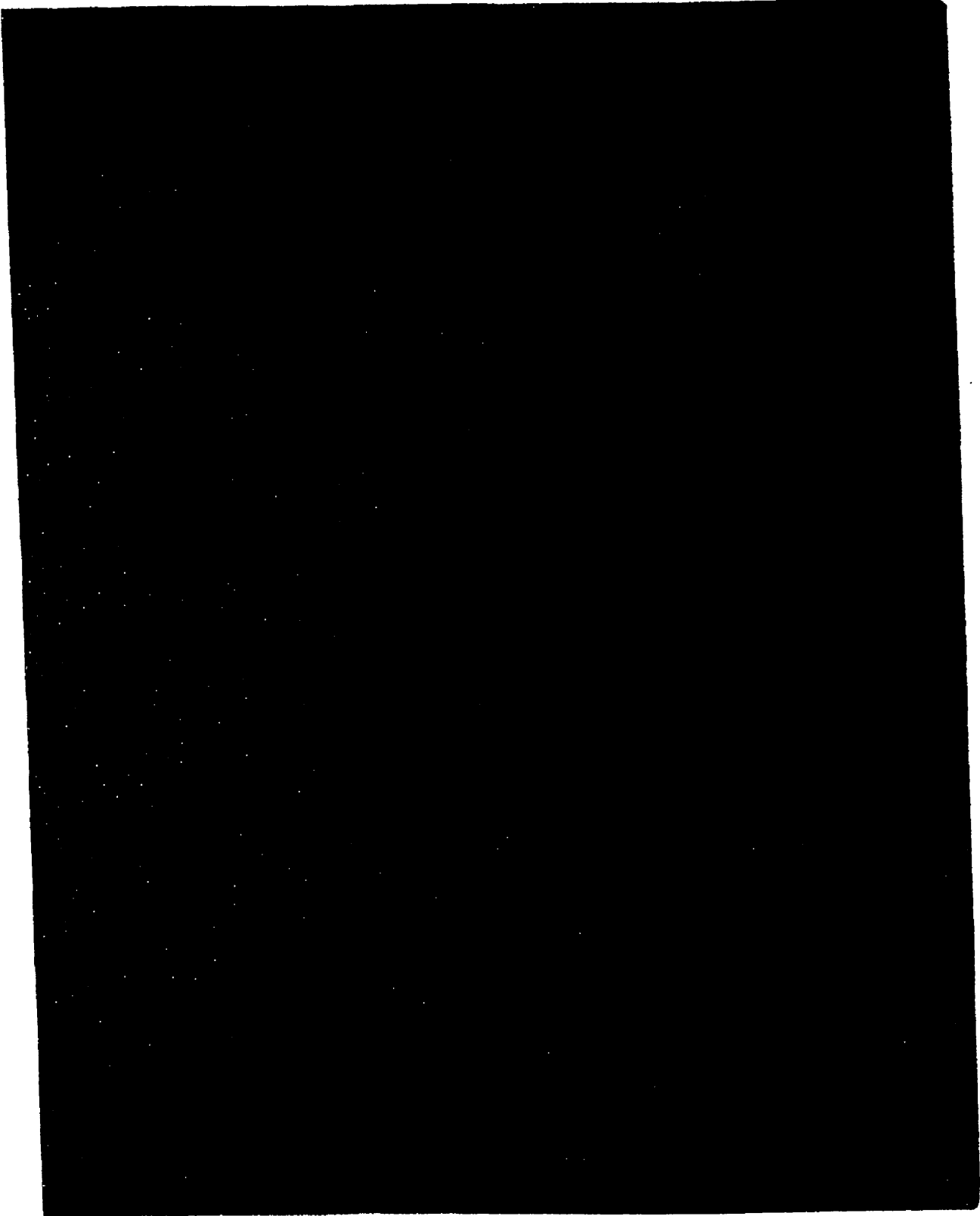


9-21
121

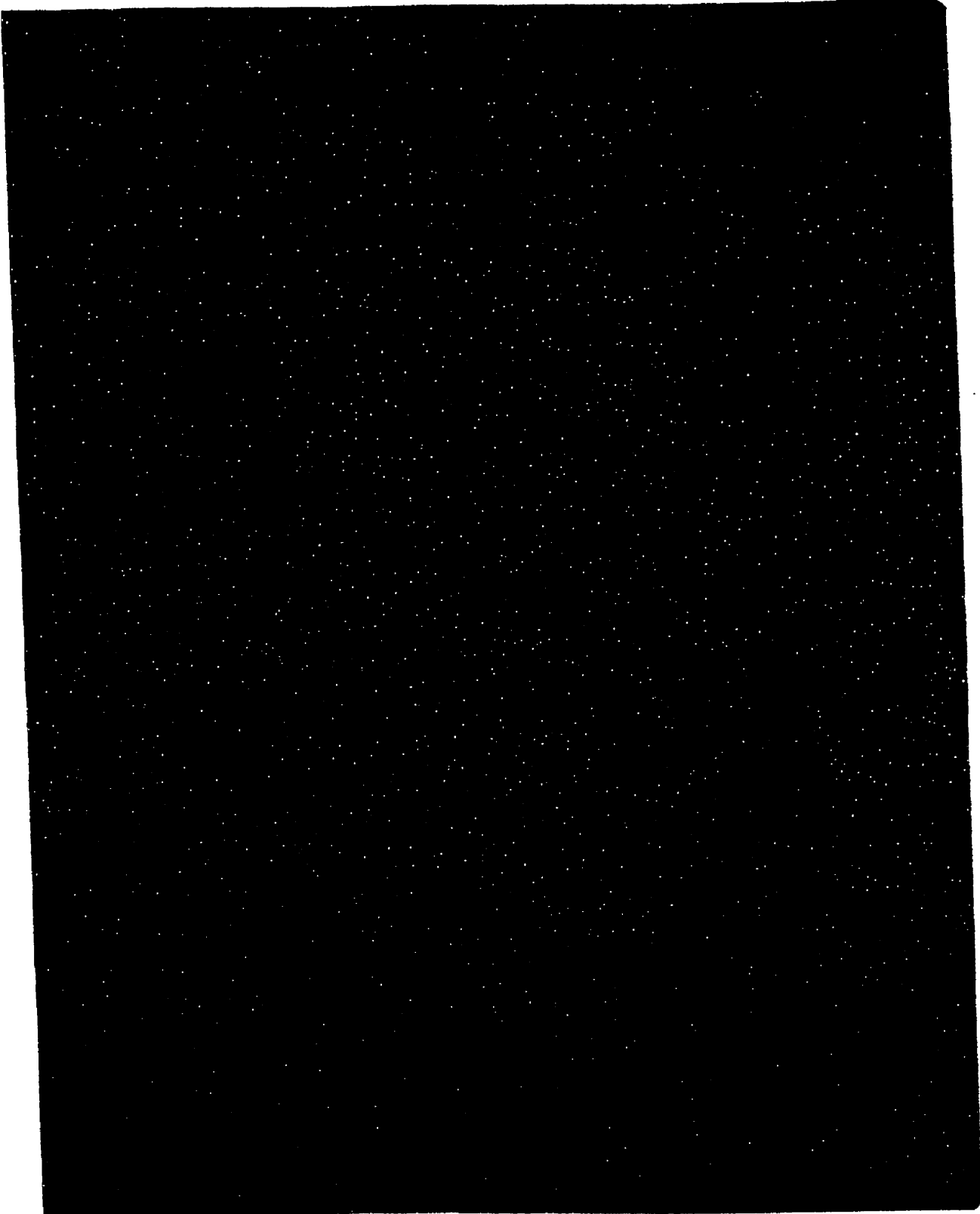




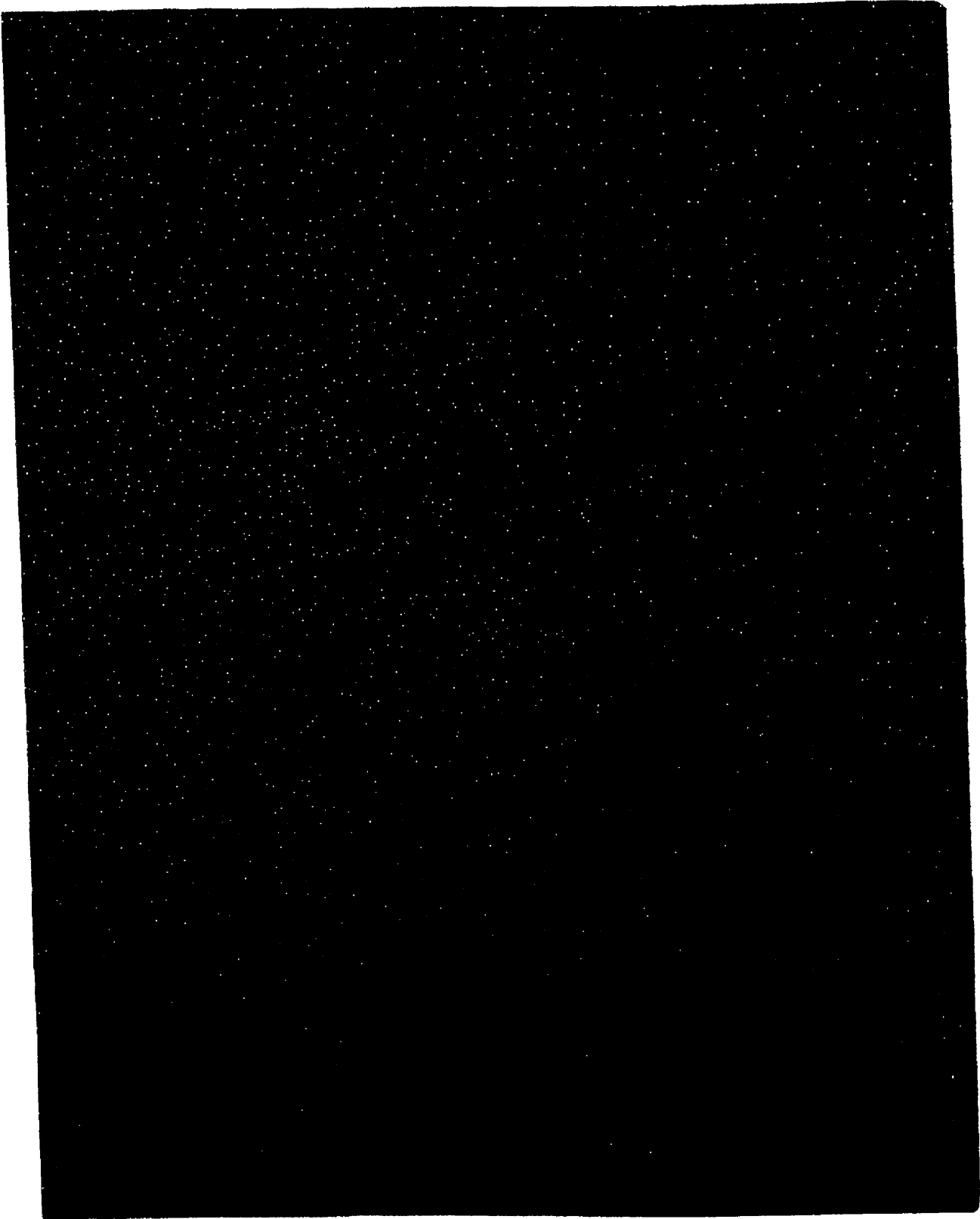
9-22
7 of 4 P 2



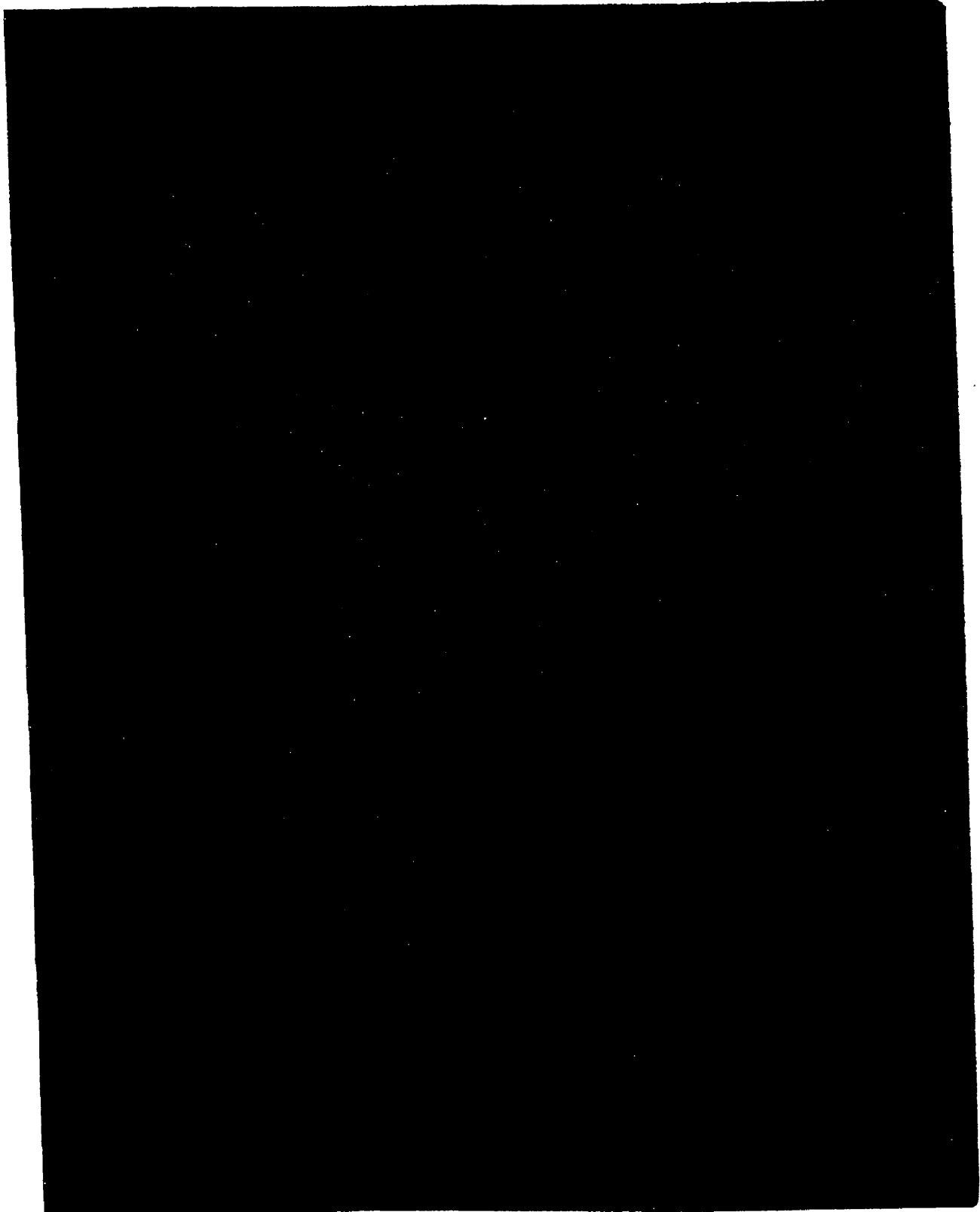
9-22 p.3
2 of 4



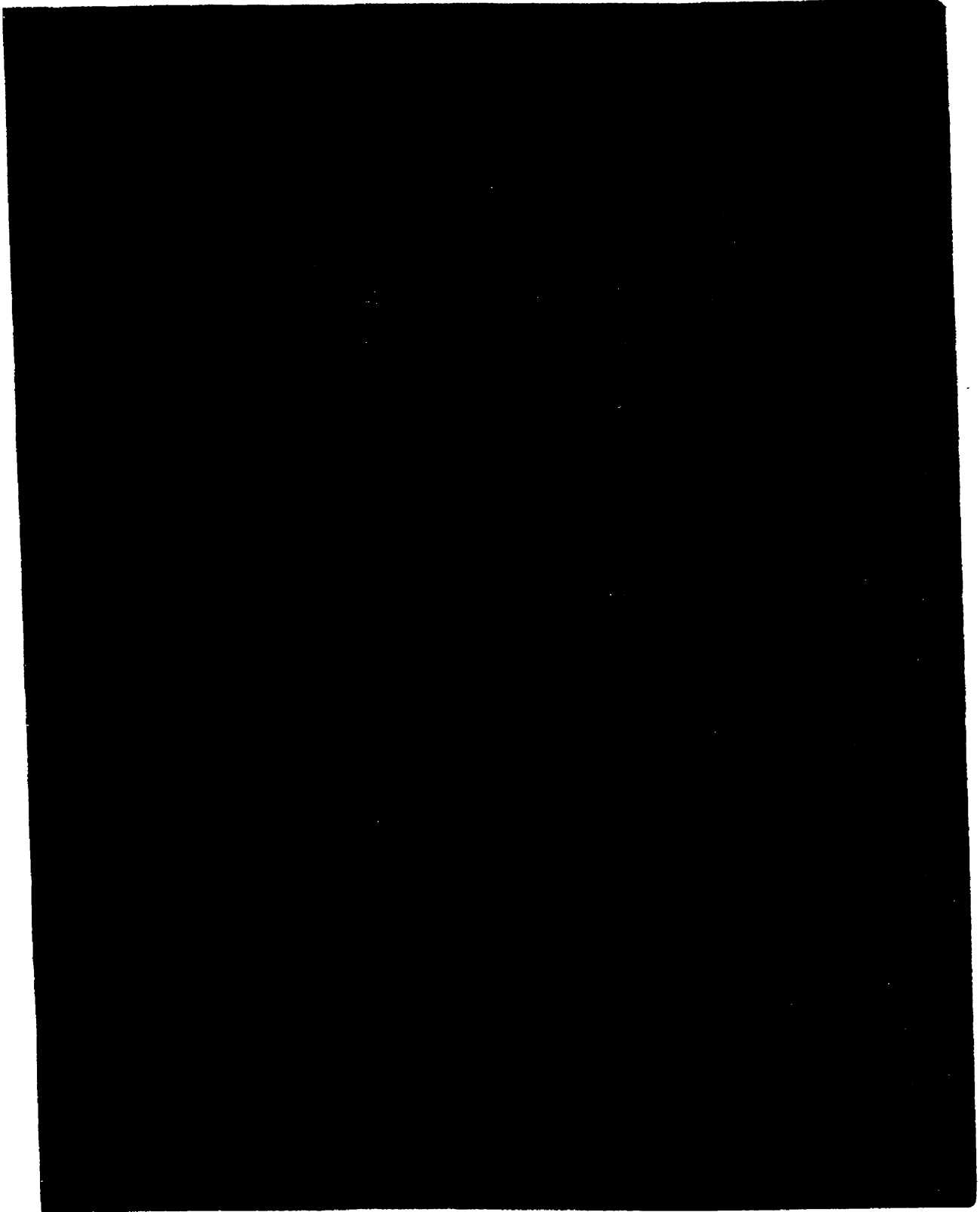
9-22 p4
11/11



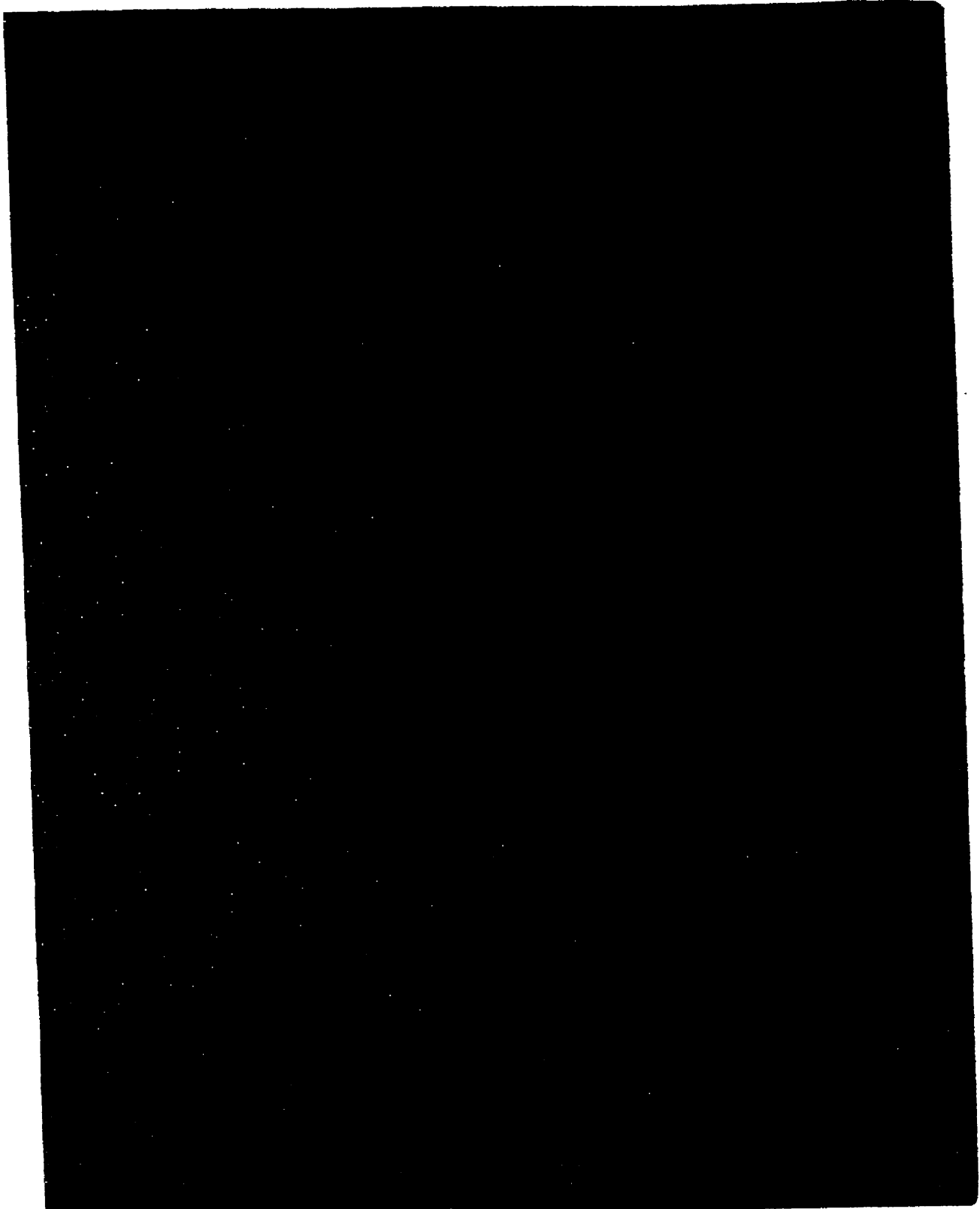
9-23
01:00



9-24
1002 P1



9-24
p. 2



9-25

D.M.I

1	<u>DECEMBER 2000 SURVEILLANCE REPORT</u>		
2	NET OPERATING INCOME	\$787,402,048	(FPSC adjusted) Wp. 2 p. 1
3	RATE BASE	\$8,964,400,635	(FPSC adjusted) Wp. 2 p. 1
4	EARNED RATE OF RETURN	8.78%	I
5	NON EQUITY WTD. COST RATE	2.19%	
6	COMMON EQUITY RATIO	54.03%	
7	WEIGHTED DEBT COST RATE	1.88%	
8	EARNED RETURN ON EQUITY	12.21%	

9	<u>ADJUSTMENTS</u>	<u>NOI EFFECT</u>	
10	O&M ADJUSTMENT (ITEMS 5-7)		
11	(\$495,265 * 61425) ^{APIT}	\$304,217	net of tax
12	RATE BASE ADJUSTMENT (ITEMS 1-4)		
13	(\$2,027,177/13) ^{AP2}	-\$155,937	
14	INTEREST SYNC EFFECT	-\$1,131	
15	ADJUSTED NOI	\$787,705,134	+
16	ADJUSTED RATE BASE	\$8,964,244,698	+
17	ADJUSTED EARNED RATE OF RETURN	8.79%	
18	ADJUSTED EARNED RETURN ON EQUITY	12.21%	
19	ROE CHANGE	0.00%	

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

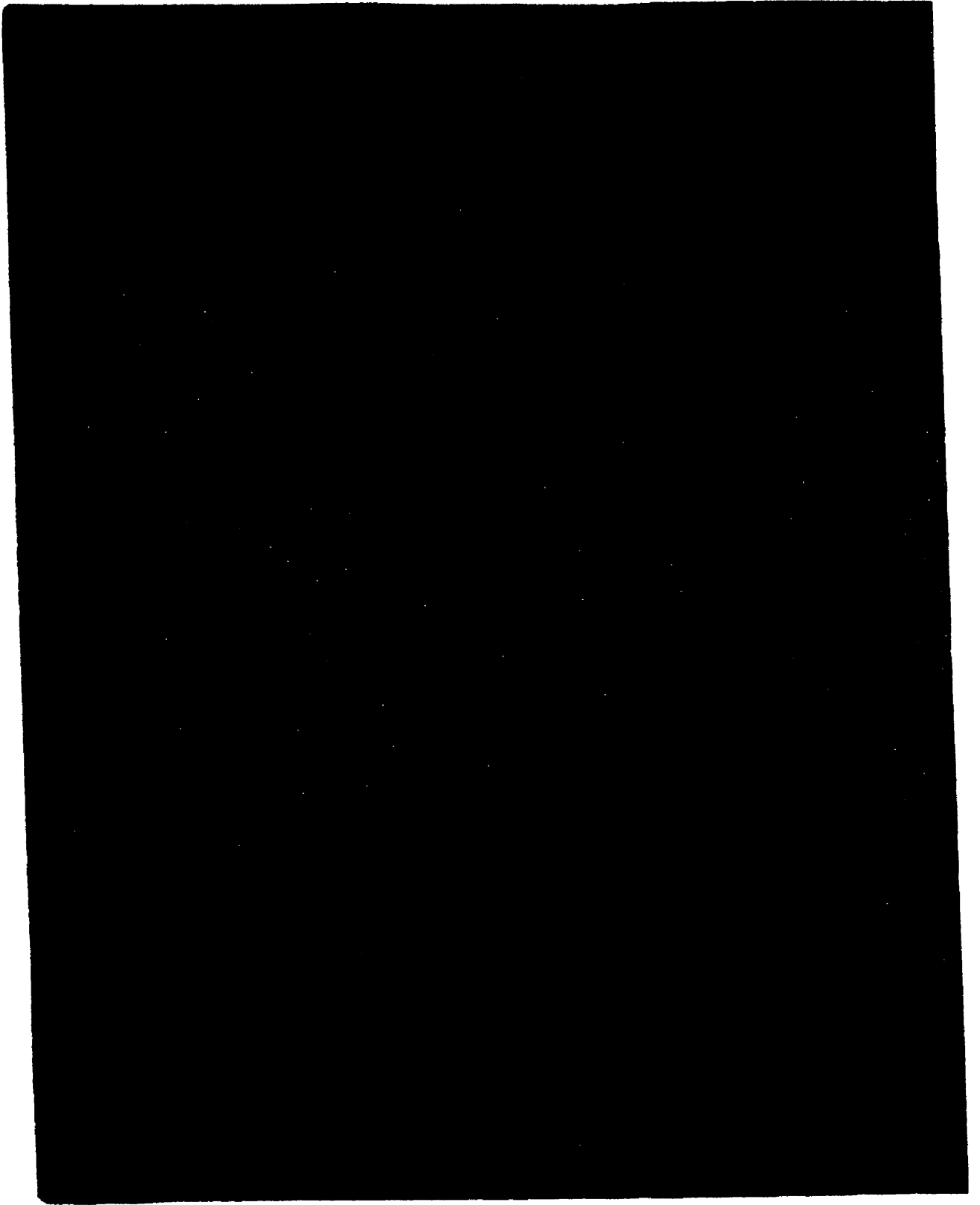
24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

27 [REDACTED]

28 [REDACTED]



59
2 of 3
p. 2

EXHIBIT B

REDACTED DOCUMENTS

FPL Group Inc
Minutes of Board of Directors

KW
8/20/01

1 / March 13, 2000 -

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[REDACTED]

Benefits cover the
approved formation of an equity investment manager
the recommendation to reconfigure the pension fund
to diversify the investment allocation by using asset
nature based managers.

May 15, 2000 - Non-recurring gain in 1999 of \$9 million
from sale of Adelphia stock
Possible purchase of merchant power plant in Rhode Island
Co. is exploring strategic initiatives related
to consolidation in the electric industry due
to legislative changes
Contract made with GE for 66 combustion turbine
generators
Approved audit committee

April 3, 2000 - FPL Group Energy, Southern Co., Duke have
joined to form an interest-based procurement Co
called Parallel. Dwindled down 54 plants, then
reversed Entergy National
New agreement for Armando Olvera & Rodrigo
Rodriguez. Approved purchase of wind
Energy in Massachusetts

Sept. 11, 2000 - Board's commission to study being discussed
Oceania / Oceola Agreement approved
Nuclear plants - can sell DOT with name for track of
contract for taking delivery of spent nuclear fuel
Proposing to recover under-recovery on fuel
over 2 yrs instead of one. Discussed Entergy merger.
FPL Energy is thinking of investing in a wind
project in Texas, a gas fuel plant, Texas a gas fuel
in Pennsylvania. Approved changes
Contract approved of contract job to be
board minutes change
Lender plan amended for change of control

8-1
389

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

1 TO: Dave W.
2 UTILITY: FPL
3 FROM: Gabriela Leow
(AUDIT MANAGER)

(AUDITOR PREPARING REQUEST)

4 REQUEST NUMBER: 105
5 AUDIT PURPOSE: surveillance

DATE OF REQUEST: 9/28/00

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

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

8 ITEM DESCRIPTION:

9 [REDACTED]

10 [REDACTED]

14 [REDACTED]

15 [REDACTED]

TO: AUDIT MANAGER _____

DATE: _____

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) _____ IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 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)

(SIGNATURE AND TITLE OF RESPONDENT)

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

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3 of 3

EXHIBIT C

JUSTIFICATION TABLE

OCTOBER 2001

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: Surveillance Audit
AUDIT CONTROL NO: 01-073-4-1

FLORIDA
 STATUTE
 366.093(3)
 Subsection: AFFIANT

<u>WKPAPER NO.</u>	<u>DESCRIPTION</u>	<u>NO. OF PAGES</u>	<u>CONF. Y/N</u>	<u>LINE NO./ COL. NO.</u>	<u>FLORIDA STATUTE 366.093(3) Subsection:</u>	<u>AFFIANT</u>
8-1	Committee Notes	7	Y	Page 3 Lines 1-5	(e)	Dennis P. Coyle
9A	Summary Int & External Audit	3	Y	Page 1 All Page 2 All	(b)	Rick Del Cueto
9-1	Internal Audit Notes	9	Y	All	(b)	Rick Del Cueto
9-2	Internal Audit Notes	2	Y	All	(b)	Rick Del Cueto
9-3	Internal Audit Notes	5	Y	All	(b)	Rick Del Cueto
9-4	Internal Audit Notes	3	Y	All	(b)	Rick Del Cueto
9-5	Internal Audit Notes	3	Y	All	(b)	Rick Del Cueto
9-7	Internal Audit Notes	5	Y	All	(b)	Rick Del Cueto
9-8	Internal Audit Notes	2	Y	All	(b)	Rick Del Cueto
9-9	Internal Audit Notes	3	Y	All	(b)	Rick Del Cueto
9-10	Internal Audit Notes	3	Y	All	(b)	Rick Del Cueto
9-11	Internal Audit Notes	1	Y	All	(b)	Rick Del Cueto
9-12	Internal Audit Notes	2	Y	All	(b)	Rick Del Cueto

9-13	Internal Audit Notes	1	Y	All	(b)	Rick Del Cueto
9-14	Internal Audit Notes	1	Y	All	(b)	Rick Del Cueto
9-15	Internal Audit Notes	5	Y	All	(b)	Rick Del Cueto
9-16	Internal Audit Notes	1	Y Y	All	(b)	Rick Del Cueto
9-17	Internal Audit Notes	2	Y	All	(b)	Rick Del Cueto
9-18	Internal Audit Notes	2	Y	All	(b)	Rick Del Cueto
9-19	Internal Audit Notes	1	Y	All	(b)	Rick Del Cueto
9-20	Internal Audit Notes	5	Y	All	(b)	Rick Del Cueto
9-21	Internal Audit Notes	1	Y	All	(b)	Rick Del Cueto
9-22	Internal Audit Notes	4	Y	All	(b)	Rick Del Cueto
9-23	Internal Audit Notes	1	Y	All	(b)	Rick Del Cueto
9-24	Internal Audit Notes	2	Y	All	(b)	Rick Del Cueto
9-25	Internal Audit Notes	1	Y	Lines 1 - 11	(b)	Rick Del Cueto
10	Audit Reports	3	Y	Page 3 Lines 9-15	(b)	Rick Del Cueto
59	Reconciliation	3	Y	Page 1 Lines 20-28 Page 2 All Page 3 Lines 9-19	(b) (b) (b)	Rick Del Cueto

EXHIBIT D

AFFIDAVITS

OCTOBER 2001

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. 01-073-4-1)

Docket No: _____

STATE OF FLORIDA)
MIAMI-DADE COUNTY)

AFFIDAVIT OF RICK DEL CUETO

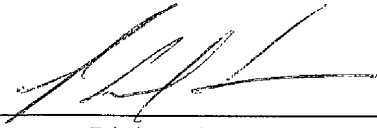
BEFORE ME, the undersigned authority, personally appeared Rick Del Cueto who, being first duly sworn, deposes and says:

1. My name is Rick Del Cueto. I am currently employed by Florida Power & Light 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. 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.

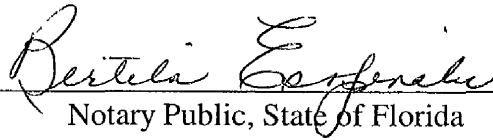
3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL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

4. Affiant says nothing further.



Rick Del Cueto

SWORN TO AND SUBSCRIBED before me this 26 day of October, 2001, 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:



Bertila Estopinal
MY COMMISSION # CC02392 EXPIRES
January 14, 2003
BONDED THRU TROY PAIR INSURANCE, 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. 01-073-4-1)

Docket No: _____

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT OF DENNIS P. COYLE

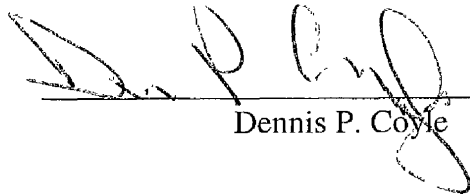
BEFORE ME, the undersigned authority, personally appeared Dennis P. Coyle who, being first duly sworn, deposes and says:

1. My name is Dennis P. Coyle. I am currently employed by FPL Group, Inc. as General Counsel and Secretary of FPL Group, Inc. and Florida Power & Light Company ("FPL"). 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 information relating to the competitive interests of FPL's parent, FPL Group, Inc. and its affiliate FPL Energy, LLC. Though the information in question relates to past consideration of potential business transactions, disclosure of such information would tend to reveal to competitors the corporate strategy of FPL Group, Inc. as well providing notice of the existence or details of transactions then being considered, which information was not previously made public and is subject to confidentiality agreements. Accordingly, the disclosure of such information would impair the competitive business of FPL Group, Inc. and FPL Energy, LLC and could give rise to legal liability. 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, the materials should be returned to FPL as soon as such 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.



Dennis P. Coyle

SWORN TO AND SUBSCRIBED before me this 35th day of October 2001, by
Dennis P. Coyle, 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:



Anita Kabana
My Commission CC896435
Expires March 29, 2004