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September 6, 2002

-VIA FEDERAL EXPRESS-

Robert L. Powell, Jr.
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Ms. Blanca Bayó
Division of the Commission Clerk
and Administrative Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: Docket Nos. 020262-EI, 020263-EI

Dear Ms. Bayó:

Enclosed for filing on behalf of Florida Power & Light Company in Docket Nos. 020262-EI and 020263-EI are the original and seven copies of Florida Power & Light Company's Request for Confidential Classification for Certain Documents Provided in Response to Staff's Second Request for Production of Documents, together with a diskette containing the electronic version of same. Please note that the original copy of the motion has an Exhibit A, which contains **CONFIDENTIAL INFORMATION** and an Exhibit B, which contains two redacted versions of the material in Exhibit A. Therefore, FPL is filing the original motion in a separate envelope stamped **CONFIDENTIAL**. The remaining copies of the motion do not contain Exhibit A or Exhibit B.

In its request, FPL seeks confidential classification of the confidential information in Exhibits A and B. If there are any questions regarding this filing, please contact me at 305-552-4027.

Very truly yours,



Robert L. Powell, Jr., Esq.

enclosures
cc: Counsel for Parties of Record

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DOCUMENT NUMBER DATE

09502 SEP -98

FPSC - COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition To Determine Need For
an Electrical Power Plant in Martin County
by Florida Power & Light Company.

) Docket No. 020262-EI
)
)
)

In re: Petition To Determine Need For
an Electrical Power Plant in Manatee County
by Florida Power & Light Company.

) Docket No. 020263-EI
)
) Dated: September 6, 2002
)

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION FOR CERTAIN DOCUMENTS PROVIDED IN RESPONSE
TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida
Administrative Code ("F.A.C."), Florida Power & Light Company ("FPL") hereby requests
confidential classification of certain documents provided in response to Staff's Second Request
for Production of Documents (the "Confidential Information"). In support thereof, FPL states:

Justification for Confidential Classification

The Confidential Information is contained in documents provided to Staff in response to
Staff's Second Request for Production of Documents Nos. 18 and 19. FPL filed a Notice of
Intent to Request Confidential Classification of this same material on August 20, 2002. The
Confidential Information for which FPL seeks confidential classification consists of rating
agency presentations made by FPL to Standard & Poors and Moody's Investment Services.

The material for which confidential classification is sought contains detailed financial
forecasts regarding FPL and FPL Group, Inc. that is intended to be and has been treated by FPL
as private and confidential and has not been publicly disclosed. In fact, if FPL were to disclose
this information without the limitations imposed by the confidentiality agreement in these

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proceedings, it would be required to file an S-8 with the Securities and Exchange Commission. In addition, the disclosure of such detailed forecasted financial information would significantly impair the competitive business interests of FPL by revealing competitive financial and generation strategies to FPL's competitors. Thus, the disclosure of the Confidential Information would injure FPL and FPL's customers.


Much of the Confidential Information for which FPL seeks confidential classification contains financial forecasts through 2005. Because this Confidential Information will continue to be confidential for more than eighteen months, FPL seeks confidential classification for thirty-six months with the opportunity to request continuation of the confidential classification.

An unredacted copy of the confidential documents, with all Confidential Information highlighted, is enclosed as Exhibit A in an envelope marked "CONFIDENTIAL." Exhibit B consists of two copies of the same material with all Confidential Information redacted. Exhibit C is a field-by-field justification of the confidential status of the Confidential Information.

WHEREFORE, FPL respectfully requests that the Commission give the Confidential Information identified in Exhibits A and B confidential classification and exempt it from public disclosure.

R. Wade Litchfield, Esq.
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Respectfully submitted,
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By: 
Robert L. Powell, Jr., Esq.
Florida Bar No. 0195464

CERTIFICATE OF SERVICE
Docket Nos. 020262-EI and 020263-EI

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Request for Confidential Classification of Certain Documents Provided in Response to Staff's Second Request for Production of Documents excluding confidential Exhibit A has been furnished by U.S. Mail this 6th day of September, 2002, to the following:

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By: 
Robert L. Powell, Jr.

Florida Power & Light Company
Field-by-Field Confidentiality Justification
Staff's Second Request for Production of Documents, No. 18

Document Title	Page Number	Line Description	Justification
Rating Agency Presentation (2002)	00115929ND	"Customers, Sales and System Capacity" – Average Customer Accounts (thousands) 2002-2006	Fla.Stat §366.093(3)(e)
SAME	00115929ND	Same – Energy Sales (million kWh) 2002-2006	Fla.Stat §366.093(3)(e)
SAME	00115929ND	Same – Avg. Growth Rate 2002-2006	Fla.Stat §366.093(3)(e)
SAME	00115931ND	"Regulatory Update," Base Revenues Under Old Agreement – Actual/Forecast 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115931ND	Same – "Rate Reduction" 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115931ND	Same – "Revenue Sharing" 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115931ND	Same, "Base Revenue to FPL" 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115931ND	"Regulatory Update," Base Revenues Under New Agreement – Original Forecast, 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115931ND	Same – Rate Reduction 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115931ND	Same – Revenue Sharing 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115931ND	Same – Base Revenue to FPL 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115931ND	"Regulatory Update" – Chart – Base Revenue to FPL	Fla.Stat §366.093(3)(e)
SAME	00115933ND	"FPL Cash Generation and Financing Plan (\$Millions)," "Cash Generated" – Cash Flow from Operations (2002-2004)	Fla.Stat §366.093(3)(e)
SAME	00115933ND	Same – "Capital Expenditures" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115933ND	Same – "Other" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115933ND	Same – "Total Generated/(Used)" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115933ND	"FPL Cash Generation and Financing Plan (\$Millions)," "Financing Plan" – Issuance of Long-Term Debt (2002-2004)	Fla.Stat §366.093(3)(e)

Florida Power & Light Company
Field-by-Field Confidentiality Justification
Staff's Second Request for Production of Documents, No. 18

Document Title	Page Number	Line Description	Justification
SAME	00115933ND	Same – “Retirements of Long-Term Debt and Preferred Stock” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115933ND	Same – “Net Equity (to) from FPL Group” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115933ND	Same – “Change in Cash/Short-Term Debt” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115933ND	Same – “Total Financing” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115933ND	Same – “Cash/(Short-Term Debt) Balance” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	“Adjusted Financial Ratios (\$Millions),” “Capital Structure” – Debt 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	Same – “Preferred” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	Same – “Equity” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	Same – “Total” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	“Adjusted Financial Ratios” – Debt Ratio Chart 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	“Adjusted Financial Ratios”, “Capitalization Ratios” – Debt 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	Same – “Preferred” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	Same – “Equity” – 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	Same – “Total” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	“Adjusted Financial Ratios” – FFO/Avg. Total Debt Chart 2002P-2004P	Fla.Stat §366.093(3)(e)
SAME	00115934ND	“Adjusted Financial Ratios” – FFO/Avg. Total Debt 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	Same – “FFO Interest Coverage” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	Same – “Pre-Tax Interest Coverage” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115934ND	Same – “FFO Interest Coverage” Chart 2002P-2004P	Fla.Stat §366.093(3)(e)

Florida Power & Light Company
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Document Title	Page Number	Line Description	Justification
SAME	00115936ND	"FPL Group Financing Plan" - Cumulative Cash requirements over the 2002 to 2004 period	Fla.Stat §366.093(3)(e)
SAME	00115936ND	Same – "Equity & Equity-Like Products"	Fla.Stat §366.093(3)(e)
SAME	00115936ND	Same – "Non-Recourse Debt"	Fla.Stat §366.093(3)(e)
SAME	00115936ND	"Recourse Debt at Florida Power & Light"	Fla.Stat §366.093(3)(e)
SAME	00115937ND	"Consolidated Cash Generation and Liquidity," "Cash Generated" – "Net Income" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – "Depreciation and Amortization" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – "Increase/(Decrease) in Deferred Income Taxes" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – "Deferrals Under Cost Recovery Clauses" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – "Other" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – "Cash Flow from Operations" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same, "Less:" – "Capital Expenditures" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same, "Less:" – "Independent Power Investments" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same, "Less:" – "Dividends Paid" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same, "Less:" – "Other" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – "Cash Generation" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	"Consolidated Cash Generation and Liquidity," "Financing Plan" – "FPL Group Common Equity" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – "Increase/(Decrease) in Debt with Equity Units" – "Group Capital" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – "Increase/(Decrease) in Long-Term Debt – FPL" 2002-2004	Fla.Stat §366.093(3)(e)

Florida Power & Light Company
Field-by-Field Confidentiality Justification
Staff's Second Request for Production of Documents, No. 18

Document Title	Page Number	Line Description	Justification
SAME	00115937ND	Same – “Increase/(Decrease) in Recourse Debt” – “Group Capital” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – “Increase/(Decrease) in Non-Recourse Debt – FPL Energy” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – “Change in Cash/Short-Term Debt and Other Total Financing” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115937ND	Same – “Cash/(Short-Term Debt) Net Position” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115938ND	“Adjusted Financial Ratios (\$Millions)” – “Capital Structure” 2001-2004	Fla.Stat §366.093(3)(e)
SAME	00115938ND	Same – “FFO/Avg. Total Debt” 2001-2004	Fla.Stat §366.093(3)(e)
SAME	00115938ND	Same – Debt Ratio Chart	Fla.Stat §366.093(3)(e)
SAME	00115938ND	Same – FFO/Avg. Total Debt Chart	Fla.Stat §366.093(3)(e)
SAME	00115938ND	Same – FFO Interest Coverage Chart	Fla.Stat §366.093(3)(e)
SAME	00115938ND	Same – FFO Interest Coverage 2001-2004	Fla.Stat §366.093(3)(e)
SAME	00115938ND	Same – Pre-Tax Interest Coverage 2001-2004	Fla.Stat §366.093(3)(e)
SAME	00115940ND	“Conclusions” – FPL Group Plan Instruments	Fla.Stat §366.093(3)(e)

Florida Power & Light Company
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Staff's Second Request for Production of Documents, No. 19

Document Title	Page Number	Line Description	Justification
Rating Agency Presentation (2002)	00115913ND	"Customers, Sales and System Capacity" – Average Customer Accounts (thousands) 2002-2006	Fla.Stat §366.093(3)(e)
SAME	00115913ND	Same – Energy Sales (million kWh) 2002-2006	Fla.Stat §366.093(3)(e)
SAME	00115913ND	Same – "Avg. Growth Rate" 2002-2006	Fla.Stat §366.093(3)(e)
SAME	00115915ND	"Regulatory Update," "Base Revenues Under Old Agreement" – Actual/Forecast 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115915ND	Same – "Rate Reduction" 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115915ND	Same – "Revenue Sharing" 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115915ND	Same, "Base Revenue to FPL" 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115915ND	"Regulatory Update," Base Revenues Under New Agreement – Original Forecast, 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115915ND	Same – Rate Reduction 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115915ND	Same – Revenue Sharing 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115915ND	Same – Base Revenue to FPL 2002-2005	Fla.Stat §366.093(3)(e)
SAME	00115915ND	"Regulatory Update" – Chart – Base Revenue to FPL	Fla.Stat §366.093(3)(e)
SAME	00115917ND	"FPL Cash Generation and Financing Plan (\$Millions)," "Cash Generated" – Cash Flow from Operations (2002-2004)	Fla.Stat §366.093(3)(e)
SAME	00115917ND	Same – "Capital Expenditures" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115917ND	Same – "Other" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115917ND	Same – "Total Generated/(Used)" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115917ND	"FPL Cash Generation and Financing Plan (\$Millions)," "Financing Plan" – Issuance of Long-Term Debt (2002-2004)	Fla.Stat §366.093(3)(e)

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SAME	00115917ND	Same – “Retirements of Long-Term Debt and Preferred Stock 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115917ND	Same – “Net Equity (to) from FPL Group” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115917ND	Same – “Change in Cash/Short-Term Debt” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115917ND	Same – “Total Financing” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115917ND	Same – “Cash/(Short-Term Debt) Balance” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	“Adjusted Financial Ratios (\$Millions),” “Capital Structure” – Debt 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	Same – “Preferred” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	Same – “Equity” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	Same – “Total” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	“Adjusted Financial Ratios” – Debt Ratio Chart 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	“Adjusted Financial Ratios,” “Capitalization Ratios” – Debt 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	Same – “Preferred” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	Same – “Equity” – 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	Same – “Total” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	“Adjusted Financial Ratios” – FFO/Avg. Total Debt Chart 2002P-2004P	Fla.Stat §366.093(3)(e)
SAME	00115918ND	“Adjusted Financial Ratios” – FFO/Avg. Total Debt 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	Same – “FFO Interest Coverage” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	Same – “Pre-Tax Interest Coverage” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115918ND	Same – “FFO Interest Coverage” Chart 2002P-2004P	Fla.Stat §366.093(3)(e)

Florida Power & Light Company
Field-by-Field Confidentiality Justification
Staff's Second Request for Production of Documents, No. 19

Document Title	Page Number	Line Description	Justification
SAME	00115920ND	"FPL Group Financing Plan" – Cumulative Cash requirements over the 2002 to 2004 period	Fla.Stat §366.093(3)(e)
SAME	00115920ND	Same – "Equity & Equity-Like Products"	Fla.Stat §366.093(3)(e)
SAME	00115920ND	Same – "Non-Recourse Debt"	Fla.Stat §366.093(3)(e)
SAME	00115920ND	"Recourse Debt at Florida Power & Light"	Fla.Stat §366.093(3)(e)
SAME	00115921ND	"Cash Generation and Liquidity," "Consolidated Cash Generated" – "Net Income" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – "Depreciation and Amortization" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – "Increase/(Decrease) in Deferred Income Taxes" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – "Deferrals Under Cost Recovery Clauses" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – "Other" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – "Cash Flow from Operations" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same, "Less:" – "Capital Expenditures" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same, "Less:" – "Independent Power Investments" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same, "Less:" – Dividends Paid" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same, "Less:" – "Other" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – "Cash Generation" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	"Consolidated Cash Generation and Liquidity," "Financing Plan" – "FPL Group Common Equity" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – "Increase/(Decrease) in Debt with Equity Units – Group Capital" 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – "Increase/(Decrease) in Long-Term Debt – FPL" 2002-2004	Fla.Stat §366.093(3)(e)

Florida Power & Light Company
Field-by-Field Confidentiality Justification
Staff's Second Request for Production of Documents, No. 19

Document Title	Page Number	Line Description	Justification
SAME	00115921ND	Same – “Increase/(Decrease) in Recourse Debt – Group Capital” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – “Increase/(Decrease) in Non-Recourse Debt – FPL Energy” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – “Change in Cash/Short-Term Debt and Other Total Financing” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115921ND	Same – “Cash/(Short-Term Debt) Net Position” 2002-2004	Fla.Stat §366.093(3)(e)
SAME	00115922ND	“Adjusted Financial Ratios (\$Millions)” – “Capital Structure” 2001-2004	Fla.Stat §366.093(3)(e)
SAME	00115922ND	Same – “FFO/Avg. Total Debt” 2001-2004	Fla.Stat §366.093(3)(e)
SAME	00115922ND	Same – Debt Ratio Chart	Fla.Stat §366.093(3)(e)
SAME	00115922ND	Same – FFO/Avg. Total Debt Chart	Fla.Stat §366.093(3)(e)
SAME	00115922ND	Same – FFO Interest Coverage Chart	Fla.Stat §366.093(3)(e)
SAME	00115922ND	Same – FFO Interest Coverage 2001-2004	Fla.Stat §366.093(3)(e)
SAME	00115922ND	Same – Pre-Tax Interest Coverage 2001-2004	Fla.Stat §366.093(3)(e)
SAME	00115924ND	“Conclusions” – FPL Group Plan Instruments	Fla.Stat §366.093(3)(e)