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Public Service Commission

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COMMISSION CLERK

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DATE: June 17, 2005

TO: Adrienne Vining, Attorney, General Counsel

FROM: Division of Regulatory Compliance and Consumer Assistance (Freeman, Vandiver) *F w [signature]*

RE: Docket 050001-EI, Recommendation concerning Florida Power & Light Company's (FPL) request for confidential classification concerning a portion of the staff working papers prepared during "Florida Power & Light Capacity Cost Recovery Clause Audit for the Year Ended December 31, 2004", Audit Control No. 05-031-4-1, Documents Numbered 03798-05, 03799-05 and 04083-05

On April 6, 2005, when copies of certain portions of staff's working papers obtained or prepared during the "Florida Power & Light Capacity Cost Recovery Clause Audit for the Year Ended December 31, 2004", were delivered to FPL at the audit exit conference, the utility requested that these materials be temporarily exempted from public access in accordance with the provisions of Rule 25-22.006(3)(a)2., Florida Administrative Code (FAC).

On April 19, 2005, staff filed documents 03798-05 and 03799-05 consisting of those specified portions of the staff's working papers.

On April 27, 2005, FPL filed a request pursuant to Rule 25-22.006, FAC, and Section 366.093, Florida Statutes (F.S.), that selected portions of the working papers prepared by the staff during the audit receive confidential classification. The utility's request included redacted copies for public inspection (document 04084-05) and copies with the sensitive material highlighted (document 04083-05).

- CMP** Documents 03798-05, 03799-05 and 04083-05 are currently held by the Commission's Division
- COM** of the Commission Clerk and Administrative Services as confidential pending resolution of
- CTR** FPL's request for confidential classification.
- ECR** Pursuant to Section 119.07, F.S., documents submitted to this Commission are public records.
- GCL** The only exceptions to this law are specific statutory exemptions and exemptions granted by
- OPC** governmental agencies pursuant to the specific items of a statutory provision. Subsections
- MMS** 366.093(3)(b)(c)(d) and (e), F.S., provide the following exemptions.
- RCA**
- SCR**
- SEC** 1
- OTH** Lockard

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June 17, 2005
Florida Power & Light Request

Subsection 366.093, F.S., provides; “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.
- (c) Security measures, systems or procedures
- (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 or services on favorable terms.
- (e) Information relating to competitive business 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 material consists of:

- 1) Information relating to auditing controls and reports of internal auditors

Auditing controls and reports of internal auditor’s may be granted a confidential classification in accordance with the provisions of Section 366.093(3)(b), F.S. Witness Robert Onsgard, FPL Manager, Internal Auditing, identifies sensitive materials concerning FPL’s internal audits within the staff working paper entitled: “List of Internal Audits.”

2) Sensitive competitive business information concerning customer accounts

Customer account information may be granted a confidential classification on the basis that the information if released would harm the competitive business of the provider of that information in accordance with the provisions of Section 366.093(3)(e), F.S. Witness Korel M. Durbin, FPL Manager of Regulatory Issues, Regulatory Affairs Department, identifies competitively sensitive data reported within staff working papers entitled: "Account Numbers on Capacity Revenue Collection" and "Billing Statements."

Witness Durbin explains it is FPL's corporate policy not to disclose customer-specific information. This policy includes, but is not limited to: customer names, addresses, telephone numbers, account numbers, rates, billing determinates (kW and kWh usage), conservation savings in kW, kWh and bills. FPL treats such information as confidential and does not disclose it, except as required by law, to entities or persons other than the customer absent the customer's consent. Witness Durbin also points out that release of this information would place FPL at a disadvantage in the marketplace and would cause harm to the customers. She states some of the confidential information contains bank account numbers and some of the information coupled with other public information would place FPL at a competitive disadvantage.

3) Sensitive competitive business information concerning purchased power

Detailed information concerning FPL's purchased power, which if released would place FPL at a competitive disadvantage, may be granted a confidential classification in accordance with the provisions of Section 366.093(3)(e), F.S.

Witness Osvaldo J. Lom, FPL Supervisor, Purchase Power Contracts, Wholesale Services identifies sensitive purchased power information as reported within staff working papers entitled: "QF - Actual Purchased Power & Other Billing Summary", "1988 Agreement", "Check Request", "SJRPP Purchased Power Accrual", "Billing No. 205", "Invoice No. 205", "Debt Service", "SJRPP Revenue Requirements", "Transmission Capability", "Semi-Annual Transmission Billing", "CCRA Payment Schedule", "Property Taxes", "Cost of Operations", "Billing #206", "Fuel Inventory Analysis", "Reimbursement of JEA's Cost of Coal & Petcoke", "Interest Received", "SJRPP Purchased Power Accrual", "Cost of Operations #208", "Billing #208", "Cost of Operations #209", "Actual Billing #209", "Payment Coupon", "SJRPP Suspension Accrual" and "Deferred Interest".

Witness Lom reports this information if disclosed would place FPL at a competitive disadvantage and that certain of this information concerns St. Johns River Power Park (SJRPP), a Jacksonville Electric Authority (JEA) and FPL venture. JEA maintains this information as confidential pursuant to Section 163.01(15)(m), F.S., and the disclosure of this information would injure JEA in the marketplace.

June 17, 2005
Florida Power and Light Request

4) Sensitive contractual and competitive business information such as contractual pricing, other contractual terms, payment records, and vendor and supplier rates

Detailed information concerning sensitive contractual information, which if released would impair the ability of FPL or its Affiliates to contract favorably may qualify for a confidential classification pursuant to the provisions of Section 366.093(3)(d), F.S.

Also sensitive competitive business information the release of which would harm the competitive business of the provider of that information may qualify for a confidential classification pursuant to the provisions of Section 366.093(3)(e), F.S.

Witness Gerald J. Yupp, Director of Wholesale Operations for FPL's Energy Marketing and Trading Division identifies the sensitive contractual and business information reported within staff's audit working papers entitled: "S-T Capacity Journal Voucher", "Invoice", "Purchase Statement", "Actual S-T Capacity Purchase", "L-T Capacity Payment", "Journal Voucher", "Payment Coupon", "Walker Revenue Client", "Daily Energy Sale Transaction", "Payment Coupon/Walker Revenue Client", "Transmission of Electric by Others", "Florida Power Corp", "JEA Invoice", "LG & E Energy Marketing Invoice", "EMT Transmission", and "Reliant Energy Service."

Witness Yupp testifies that release of this sensitive contractual and competitive business information would impair the efforts of FPL to contract for goods and services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Some of this information would place FPL at a disadvantage when coupled with other information which is publicly available.

5) Sensitive security measures, contractual information and negotiated agreements for the protection of FPL facilities.

Pursuant to Section 366.093(3)(c), F.S., security measures, systems or procedures may qualify for a confidential classification.

Also detailed information concerning sensitive contractual information, which if released would impair the ability of FPL or its Affiliates to contract favorably may qualify for a confidential classification pursuant to the provisions of Section 366.093(3)(d), F.S.

Witness Pamela L. Sonnelitter, FPL General Manager of business Services in the Power Generation Division, identifies the sensitive security and contractual information reported within staff's audit working papers entitled: "Security Sample Testing", and "SJRPP Security Project."

Witness John Hartzog, FPL Manager of Nuclear Financial and Information Services, identifies sensitive security measures reported within staff's working papers entitled; "Security Sample testing" and "Security Vehicles."

Staff Analysis -- Conclusion

After reading the information identified by witnesses Onsgard, Dubin, Lom, Yupp, Sonnelitter and Hartzog, we recommend that this information granted a confidential classification since the sensitive information pertains to FPL's internal audits, security information and procedures, sensitive contractual information release of which would harm FPL or its affiliates, and sensitive competitive business information release of which would harm the providers of that information. These types of information is set out as exception to public records laws in accordance with the provisions of Sections 366.093(3)(b)(c)(d)(e), Florida Statutes.

Information Held as Confidential

To qualify as proprietary confidential business information the material must also be held as private and not be released to the public. FPL asserts that this sensitive information meets the statutory restrictions necessary for the material to be provided a confidential classification. The FPL witnesses also assert FPL has maintained the confidentiality of these materials.

Duration of the Confidential Classification Period

FPL requests that this material be returned to the utility once the 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, confidential classification is limited to 18 months. Without cause shown for a longer period, we recommend that the period of confidential 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, as Found

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.

A detailed recommendation follows:

Detailed Recommendation, as Found

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03798					
9	List of Internal Audits	1	All	Grant	Internal audit controls and reports of internal auditors
41-2/1	Account Numbers on Capacity Revenue Calculation	1	Col A, 1-30	Grant	Sensitive competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
1-2/1		2	Col A, 1-17	Grant	Sensitive competitive business information
1-2/1	Capacity Revenue Calculation		Col A, 1-30	Grant	Sensitive competitive business information
11-2/1	Account Numbers on Capacity Revenue Calculation	4	Col A, 1	Grant	Sensitive competitive business information
11-2/1	Account Numbers on Capacity Revenue Calculation	5-8	Col A, 1-30	Grant	Sensitive competitive business information
11-2/1	Account Numbers on Capacity Revenue Calculation	9	Col A, 1-28	Grant	Sensitive competitive business information
11-2/1	Account Numbers on Capacity Revenue Calculation	10	Col A, 1-3	Grant	Sensitive competitive business information
41-2/1	Account Numbers on Capacity Revenue Calculation	11-12	Col A, 1-30	Grant	Sensitive competitive business information
41-2/1	Account Numbers on Capacity Revenue Calculation	13	Col A, 1-17	Grant	Sensitive competitive business information
41-2/1	Account Numbers on Capacity Revenue Calculation	14	Col A, 1-7	Grant	Sensitive competitive business information
41-2/1	Account Numbers on Capacity Revenue Calculation	15	Col A, 1-23	Grant	Sensitive competitive business information
41-2/1	Account Numbers on Capacity Revenue Calculation	16	Col A, 1-3	Grant	Sensitive competitive business information
41-2/1	Account Numbers on Capacity Revenue Calculation	17	Col A, 1-2	Grant	Sensitive competitive business information
41-2/2	Billing Statements	1-4	Col A, 3; Col B, 5-30; Col C, 3,6,10-12, 15-16; Col D-E, 8-9, 21A-28A Col F, 8-9,19A-31A; 31	Grant	Sensitive competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03798-05 and 04083-05					
41-2/2	Billing Statements	6-14	Col A, 3; Col B, 5-30; Col C, 3,6,10-12, 15-16; Col D-E, 8-9, 21A-28A Col F, 8-9,19A-11A; 31	Grant	Sensitive competitive business information
42-1	QF--Actual Purchased Power & Other Billing Summary	1	All	Grant	Sensitive competitive business information
42-2	QF--Actual Purchased Power & Other Billing Summary	1	All	Grant	Sensitive competitive business information
43-1	1988 Agreement	1-2	All	Grant	Sensitive competitive business information
43-1/1-1	Actual Purchased Power & Other Billing Summary	1	All	Grant	Sensitive competitive business information
43-2	1988 Agreement	1-2	All	Grant	Sensitive competitive business information
43-2/1-1	Check Request	2	All	Grant	Sensitive competitive business information
43-2/1-2	Actual Purchased Power & Other Billing Summary	1	All	Grant	Sensitive competitive business information
44-1	SJRPP Purchased Power Accrual	1	All	Grant	Sensitive competitive business information
44-1	SJRPP Purchased Power Accrual	2	Col A, 8-10; Col C, 12-20; Col D, 12-19	Grant	Sensitive competitive business information
44-1	SJRPP Purchased Power Accrual	3	All	Grant	Sensitive competitive business information
44-1/1	Billing No. 205	1	All	Grant	Sensitive competitive business information
44-1/1-1	Invoice No. 205	1	Col B, 9; Col C, 12-20; Col D, 12-19	Grant	Sensitive competitive business information
44-1/2	Debt Service	1	Col A, 2-4,20-21; Col B, 5-6, 20-22; Col D, 5-6	Grant	Sensitive competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
44-1/2	Debt Service	2	Col A, 2-4,21-22; Col B, 6-7,23; Col D, 6-7	Grant	Sensitive competitive business information
44-1/2-1	SJRPP Revenue Requirements	1-3	All	Grant	Sensitive competitive business information
44-1/2-2	Debt Service	1-2	All	Grant	Sensitive competitive business information
44-1/2-2/1	Check Request	1-2	7-10	Grant	Sensitive competitive business information
44-1/3	Transmission Capability	1	Col A, 2-4,20-21; Col B, 6,20-22; Col C, 5; Col E, 6	Grant	Sensitive competitive business information
44-1/3-1	Semi-Annual Transmission Billing	1-2	All	Grant	Sensitive competitive business information
44-1/3-1/1	Check Request	1-2	6-10	Grant	Sensitive competitive business information
44-1/4	CCRA Payment Schedule	1	Col A, 2-4,13-14	Grant	Sensitive competitive business information
44-1/4-1	CCRA Payment Schedule	1-2	All	Grant	Sensitive competitive business information
44-1/4-1/1	Check Request	1-2	6-9	Grant	Sensitive competitive business information
44-1/5	Property Taxes	1	Col A-B, 5	Grant	Sensitive competitive business information
44-1/5	Property Taxes	2	All	Grant	Sensitive competitive business information
44-1/5-1	Property Taxes	1	8	Grant	Sensitive competitive business information
44-1/6	Cost of Operations	1	All	Grant	Sensitive competitive business information
44-1/6-1	Check Request	1-2	6-9	Grant	Sensitive competitive business information
44-1/6-2	Billing #206	1	All	Grant	Sensitive competitive business information
44-1/6-2/1	Fuel Inventory Analysis	1-4	All	Grant	Sensitive competitive business information
44-1/6-2/1-1	Reimbursement of JEA's Cost of Coal & Petcoke	1-3	All	Grant	Sensitive competitive business information
44-1/6-2/1-1/1	Check Request	1-2	6-9	Grant	Sensitive competitive business information
44-1/6-3	Interest Received	1-2	All	Grant	Sensitive competitive business information
44-2	SJRPP Purchased Power Accrual	1	All	Grant	Sensitive competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
44-2	SJRPP Purchased Power Accrual	2	10; Col C, 13-21; Col D, 13-20	Grant	Sensitive competitive business information
44-2	SJRPP Purchased Power Accrual	3	All	Grant	Sensitive competitive business information
44-2/1	Cost of Operations #208	1	All	Grant	Sensitive competitive business information
44-2/1-1	Billing #208	1	Col B, 9; Col C, 12-20; Col D, 12-19	Grant	Sensitive competitive business information
44-2/2	Cost of Operations #209	1	All	Grant	Sensitive competitive business information
44-2/2-1	Check Request	1-2	6-9	Grant	Sensitive competitive business information
44-2/2-2	Actual Billing #209	1	All	Grant	Sensitive competitive business information
44-2/2-2/1	Fuel Inventory Analysis	1-4	All	Grant	Sensitive competitive business information
44-2/2-2/1-1	JEA's Cost of Coal & Petcoke	1-3	All	Grant	Sensitive competitive business information
44-2/2-2/1-1/1	Payment Coupon	1	Col A, 1,23; Col C, 6; Col D, 18	Grant	Sensitive competitive business information
44-2/2-2/1-1/2	Check Request	1	5-9	Grant	Sensitive competitive business information
44-2/2-3	Interest Received	1-2	All	Grant	Sensitive competitive business information
44-3/1-1	SJRPP Suspension Accrual	1	All	Grant	Sensitive competitive business information
44-3/1-1/1	Deferred Interest	1	Col A, 1-3, Col C, 5; 20-28	Grant	Sensitive competitive business information
✓ 45-1	S-T Capacity Journal Voucher	1	Col A, 18	Grant	Sensitive contractual and competitive business information
✓ 45-1/1	Invoice	1	8-12; Col C-D, 23-46; Col G, 20-47; Col I, 20-46; Col J, 20-47	Grant	Sensitive contractual and competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
D					
4:	Invoice		4; Col B, 15-16; Col C, 15,17-18; Col D, 15; Col E, 15,17-18, 20-22,24-26	Grant	Sensitive contractual and competitive business information
45-1/1-1	Purchase Statement		4; Col B, 14-16; Col E, 14,17-18;	Grant	Sensitive contractual and competitive business information
45-1/1-2	Invoice	1	Col F, 10-12; Col I, 10-15	Grant	Sensitive contractual and competitive business information
45-1/1-2	Invoice	2	4; Col A, 6-43,46-47	Grant	Sensitive contractual and competitive business information
45-1/2	Invoice	1	Col B, 13-15; Col C, 17,24-25; Col D, 17,24-25, 30-34,36-40	Grant	Sensitive contractual and competitive business information
45-1/2-1	Purchase Statement	1	4; Col B, 14-22; Col C, 14,20; Col D, 14,20; Col E, 14,20,23-24 31-33	Grant	Sensitive contractual and competitive business information
45-1/2-1	Purchase Statement	2	4; Col A, 40-42 Col B, 14-31, 34-36, 40-42; Col C, 14,29,32,38 Col D, 14,20; Col E, 14,20,23,26 29,32,34,37-38	Grant	Sensitive contractual and competitive business information
45-1/2-1	Purchase Statement	3	3; Col F, 7-30	Grant	Sensitive contractual and competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
45-1/3	Invoice		Col C, 14-20; Col D, 13-20; Col E, 14-21, 4-26,30,33, 8-39,42	Grant	Sensitive contractual and competitive business information
45-1/3-1	Purchase Statement		Col A, 22-24 Col B, 15-17; Col C, 16,19-20; Col D, 15; Col E, 15,18-20; 17-29	Grant	Sensitive contractual and competitive business information
45-1/3-1	Purchase Statement	2	Col B, 15-17; Col C, 15,19-20; Col D, 15; Col E, 15,18-20, 22-24	Grant	Sensitive contractual and competitive business information
45-1/3-1	Purchase Statement	3	4; Col B, 15-18; Col C, 15,17, 19-20; Col D, 15,17; Col E, 15,17, 19-20,22-24	Grant	Sensitive contractual and competitive business information
45-1/3-1	Purchase Statement	4	1; Col F, 6-25,27,29	Grant	Sensitive contractual and competitive business information
45-1/4	Invoice	1	Col A, 18; Col B, 15,17; Col C, 15,17-20, 38-39	Grant	Sensitive contractual and competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
45-1/4-1	Purchase Statement	1	5; Col A, 24-26,29 Col B, 16-18; Col C, 16; Col D, 16,19, 21-22;	Grant	Sensitive contractual and competitive business information
45-1/4-1	Purchase Statement	2	5; Col B, 15-17; Col C, 15;18-19; Col D,15; Col E, 15,18-19, 21-23	Grant	Sensitive contractual and competitive business information
45-1/4-1	Purchase Statement	3	1; Col F, 5-60	Grant	Sensitive contractual and competitive business information
45-1/5	Invoice	1	Col B, 8-11; Col C, 8-10; Col D, 8-12,17-18, 25-29	Grant	Sensitive contractual and competitive business information
45-1/5	Invoice	2	3; Col B, 12-14; Col C, 12,16-17; Col D, 12; Col E, 12,15-17, 19-21	Grant	Sensitive contractual and competitive business information
45-1/5	Invoice	3	1; Col F, 5-33	Grant	Sensitive contractual and competitive business information
45-1/6	Invoice	1	Col A, 4,10,14-17; Col B, 5,20-21, 27-28; Col C, 6-8,35-39	Grant	Sensitive contractual and competitive business information
45-1/6	Invoice	2	Col A, 14-28,36-37	Grant	Sensitive contractual and competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
45-1/6	Invoice	3	Col A, 14-23	Grant	Sensitive contractual and competitive business information
45-1/6	Invoice	4	3; Col B, 10-29; Col C, 10,25,28, 31-32; Col D, 10,25,28; Col E, 10,16,19,22, 25,28,30-32,37	Grant	Sensitive contractual and competitive business information
45-1/6	Invoice	5	1; Col F. 5-18,20,22	Grant	Sensitive contractual and competitive business information
45-1/7	Invoice	1	Col B, 8-11,14-16; Col C, 8-11,14-16; Col D, 8-11,14-18, 29,30,32,34-38	Grant	Sensitive contractual and competitive business information
45-1/7	Invoice	2	3; Col B, 13-30; Col C, 13,25,28, 32-33; Col D, 13,25,28; Col E, 13,19,22,25, 28,31-33,38-40	Grant	Sensitive contractual and competitive business information
45-1/7	Invoice	3	1; Col F. 5-32	Grant	Sensitive contractual and competitive business information
45-1/8	Invoice	1	Col A, 8; Col B, 8,10-11, 17-18; Col C. 8,12,26	Grant	Sensitive contractual and competitive business information
45-1/8	Invoice	2	3; Col B,14-15; Col C, 14,17-18; Col D, 14; Col E, 14,16-18, 20-22	Grant	Sensitive contractual and competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
45-1/8	Invoice	3	1; Col F, 5-33	Grant	Sensitive contractual and competitive business information
45-1/9	Actual S-T Capacity Purchase	1	5,8,11,14; Col A, 1-4,6-7, 9-10,12-13,15-19, 21-22,23-29,31-49; Col B, 1-4,6-7, 9-10,12-13,15-19, 21-29,31-49; Col C, 9-10,15-19, 21,23-29,39,42-43, 45,47-49; Col D-F, 8-9, 14-15,21,25,39,45	Grant	Sensitive contractual and competitive business information
45-2	S-T Capacity Journal Voucher	1	Col A, 1-6;	Grant	Sensitive contractual and competitive business information
45-2	S-T Capacity Journal Voucher	2	Col A, 23-48; Col AA, 20-21; Col B, 8-10,20-48; Col C-D, 20-48	Grant	Sensitive contractual and competitive business information
45-2	S-T Capacity Journal Voucher	3	Col B, 8-9; Col E, 8-13; Col G, 8-9; Col H, 8-13	Grant	Sensitive contractual and competitive business information
45-2/1	L-T Capacity Payment	1	Col A, 1-11	Grant	Sensitive contractual and competitive business information
45-2/1-1	Invoice	1	Col A, 1-3: Col B, 9-11,16-18; Col C, 14,21-22; Col D, 14,21-22, 27,30,32-34	Grant	Sensitive contractual and competitive business information
45-2/1-1	Invoice	2	Col A-B, 13,15,18; Col C, 13,15,18, 24-25,29,32,41;	Grant	Sensitive contractual and competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
15-2/1-1	invoice	3	Col A-B, 13,16; Col C, 13,16-17, 2,25,35	Grant	Sensitive contractual and competitive business information
15-2/1-1	invoice	4	Col B, 27; Col C, 11,16,19-13; Col D, 13,18,26, 33-34,38,40; Col E, 6-8	Grant	Sensitive contractual and competitive business information
✓ 15-2/1-1	Invoice	5	Col B-C, 9-12, 15-17; Col D, 9-12,15-17, 19; 21-22	Grant	Sensitive contractual and competitive business information
✓ 15-2/1-1	Invoice	6	Col A, 14,17,20, 23; Col B, 9-10,12-13, 15-16,18-19,21-22, 24-25,27,29,31-32, 35-37,40-41,44-45, 47-49,51-52,55-57, 59-61,63-68; Col C, 9-10,12-13, 15-16,18-19,21-22, 24-25,27,29,31-32, 35-37,40-41,44-45, 47,49,51-52,55-60, 63-64,68; Col D, 18-19, 24-25,31-32,35-37, 40-41,44-45,51-52, 55-57,63-65,68; Col E-F, 18-19, 24-25,31,36,50, 57,63	Grant	Sensitive contractual and competitive business information
45-3	Invoice	1	14	Grant	Sensitive contractual and competitive business information
Documents 03798-05 and 04083-05					

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
45-3	nvoice	2	Col B, 8-10; Col C, 23-44; Col E, 20-46; Col F, 20,23-44; Col G, 20-46	Grant	Sensitive contractual and competitive business information
45-3	nvoice	3	Col F-G, 8-9	Grant	Sensitive contractual and competitive business information
45-3/1	nvoice	1	Col A, 1-5	Grant	Sensitive contractual and competitive business information
45-3/1	nvoice	2	Col B, 9-11,16-18; Col C, 14,21-22, 33-34,37-39; Col D, 9,14,21-22	Grant	Sensitive contractual and competitive business information
45-3/1	invoice	3	Col A, 14,17,20; Col B, 14,16,19; Col C, 14,16,19, 24-25,31-34,42	Grant	Sensitive contractual and competitive business information
45-3/1	Invoice	4	Col A-B, 16,18; Col C 16,18-19, 25,28,37	Grant	Sensitive contractual and competitive business information
45-3/1	Invoice	5	Col B, 7,15-18; Col C, 9,21,29-30, 37-40	Grant	Sensitive contractual and competitive business information
45-3/1	Invoice	6	7,10-13; Col B, 17-19; Col C, 23-25; Col D, 17-20, 23-25; Col E,17-19,23-27, 36-37	Grant	Sensitive contractual and competitive business information
45-4	Invoice	1	11	Grant	Sensitive contractual and competitive business information

Documents 03798-05 and 04083-05

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
45-4	Invoice	1	Col B, 8-12; Col C, 23-27; Col D, 20-31; Col E, 20,23-27;	Grant	Sensitive contractual and competitive business information
45-4/1	Invoice		Col A, 1-5	Grant	Sensitive contractual and competitive business information
45-4/1	Invoice	2	Col A, 32-37 Col B, 9-11,16-18; Col C, 14; Col D, 9,14,21-22;	Grant	Sensitive contractual and competitive business information
45-4/1	Invoice	3	Col B-C, 16,18-19; Col D, 16,18-19, 25-26,31,34,42	Grant	Sensitive contractual and competitive business information
45-4/1	Invoice	4	Col A, 24,27; Col B-C, 16,18; Col D, 16,18-19,35	Grant	Sensitive contractual and competitive business information
45-4/1	Invoice	5	Col A, 27; Col B, 11,19-22 Col C, 13,25-26, 32-33; Col D, 1-4,37,39	Grant	Sensitive contractual and competitive business information
45-4/1	Invoice	6	7,11-14,16; Col B, 18-21, 24-26; Col C, 18-21, 24-26; Col D, 18-21, 24-29,40-41	Grant	Sensitive contractual and competitive business information
47-1/1	Journal Voucher	2	5	Grant	Sensitive contractual and competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
47-1/1	Journal Voucher	3	11-12	Grant	Sensitive contractual and competitive business information
47-1/1-1	Payment Coupon	1	2; Col A, 27,29-31, 33-34; Col B, 10; Col C, 19,28,33; Col D, 28,33,36	Grant	Sensitive contractual and competitive business information
47-1/1-1/1	Invoice	1	4; Col A, 9-48; Col B-D, 9,14,19, 24,29,34,39,44;	Grant	Sensitive contractual and competitive business information
47-1/1-1/1	Invoice	2	4; Col A, 5-53; Col B-D, 5,10,15, 20,25,30,35,40,45, 50	Grant	Sensitive contractual and competitive business information
47-1/1-1/1	Invoice	3	4; Col A, 5-47; Col B-D, 6,9,12, 15,18,21,24,27,30, 33,36,39,42,45	Grant	Sensitive contractual and competitive business information
47-1/1-1/1	Invoice	4	4; Col A, 5-48; Col B-D, 5,8,11, 14,17,20,23,26,29, 32,35,38,41,44,47	Grant	Sensitive contractual and competitive business information
47-1/1-1/1	Invoice	5	4 Col A, 5-34;37-39; Col B-D, 5,8,11, 14,17,20,23,26,29, 32,35,36;	Grant	Sensitive contractual and competitive business information
47-1/1-1/1-1	Walker Revenue Client	1	0: Col A-C, 1-36	Grant	Sensitive contractual and competitive business information

Documents 03799-05 and 04083-05

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
47-1/1-4	Payment Coupon	1	5; Col A, 26,29-38; Col B, 10,18A,28,31,35; Col C, 28,31,35; Col D, 43-48; 40	Grant	Sensitive contractual and competitive business information
47-1/1-4/1	invoice	1	4; Col A, 15-17, 23-25; Col B, 15,20-21; Col C, 15; Col D, 15,19-21	Grant	Sensitive contractual and competitive business information
47-1/1-4/1	Invoice	2	Col A, 4; Col B, 14-16, 22-24; Col C, 14,19-20; Col D, 14; Col E, 14,17,19-20	Grant	Sensitive contractual and competitive business information
47-1/1-4/2	Invoice	1	4; Col A, 14-49; Col B-D, 14,17,20, 23,26,29,32,35,38, 41,44,47	Grant	Sensitive contractual and competitive business information
47-1/1-4/2	Invoice	2	4; Col A, 7-48; Col B-D, 7,10,13, 16,19,22,25,28,31, 34,37,40,43,46	Grant	Sensitive contractual and competitive business information
47-1/1-4/2	Invoice	3	4; Col A, 6-49; Col B-D, 6,9,12, 15,18,21,24,27,30, 33,36,39,42,45,48	Grant	Sensitive contractual and competitive business information

Documents 03799-05 and 04083-05

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
47-1/1-4/2	Invoice		1: Col A, 7-48; Col B-D, 7,10,13,16,19,22, 25,28,31,34,37,40, 43,46	Grant	Sensitive contractual and competitive business information
47-1/1-4/2	Invoice	5	4; Col A, 6-34,38-40; Col B, 6,9,12,15, 18,21,24,27,30,33, 36,36A; Col C-D, 6,9,12, 15,18,21,24,27,30, 33	Grant	Sensitive contractual and competitive business information
47-1/1-4/2	Invoice	6-7	2,5,9,18,26, 28-30,32	Grant	Sensitive contractual and competitive business information
47-1/1-4/3	Walker Revenue Client	1	0; Col A-C, 1-36	Grant	Sensitive contractual and competitive business information
47-2/1	Journal Voucher	2	Col F, 1-2	Grant	Sensitive contractual and competitive business information
47-2/1-1	Payment Coupon	1	3,6,12,20; Col A, 28,31-36; Col B, 20,30,34; Col C, 30,34,38	Grant	Sensitive contractual and competitive business information
47-2/1-1/1	Invoice	1	4: Col A, 14-52: Col B-D, 14,18,23, 28,33,38,43,48	Grant	Sensitive contractual and competitive business information
47-2/1-1/1	Invoice	2	4: Col A, 6-55; Col B-D, 6,11,16, 21,26,31,36,41,46, 51	Grant	Sensitive contractual and competitive business information

Documents 03799-05 and 04083-05

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
47-2/1-1/1	Invoice		4: Col A, 7-44; Col B-D, 7,12,17, 19,21,23,25,27,29, 31,33,35,37,39,41, 43	Grant	Sensitive contractual and competitive business information
47-2/1-1/1	Invoice	1	4: Col A, 6-43; Col B-D, 5,8,10,12,14,16,18, 20,22,24,26,28,30, 32,34,36,38,40,42	Grant	Sensitive contractual and competitive business information
47-2/1-1/1	Invoice	5	4: Col A, 6-33; Col B, 6,8,10,12, 14,16,18,20,22,24, 26,28,30,32,34,35; Col C-D, 6,8,10,12 14,16,18,20,22,24, 26,28,30,32	Grant	Sensitive contractual and competitive business information
47-2/1-1/1-1	Walker Revenue Client	1	0; Col A-C, 1-36	Grant	Sensitive contractual and competitive business information
47-2/1-4	Payment Coupon	1	2,5,10; Col A, 27,29-36; Col B, 20; Col C, 29,33; Col D, 29,33,38, 41-44,46,48A	Grant	Sensitive contractual and competitive business information
47-2/1-4	Payment Coupon	2	4: Col A, 15-19, 23-25; Col B, 15,20,21; Col C, 15; Col D, 15,18,20-2	Grant	Sensitive contractual and competitive business information
47-2/1-4/1	Daily Energy Sale Transaction	1-3	All	Grant	Sensitive contractual and competitive business information

Documents 03799-05 and 04083-05

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
47-2/1-4/2	Invoice	1	1; Col A, 14-44; Col B-D, 14,17,19, 21,23,25,27,29,31, 33,35,37,39,41,43	Grant	Sensitive contractual and competitive business information
47-2/1-4/2	Invoice	2-4	1; Col A, 6-43; Col B-D, 6,8,10, 12,14,16,18,20,22, 24,26,28,30,32,34, 36,38,40,42,	Grant	Sensitive contractual and competitive business information
47-2/1-4/2	Invoice	5	4; Col A, 6-20,26-28; Col B, 6,8,10,12, 14,16,18,23,24; Col C, 6,8,10,12, 14,16,18; Col D, 6,8,10,12, 14,16,18,21,23,24	Grant	Sensitive contractual and competitive business information
47-2/1-4/2	Invoice	6	4; Col A, 15-17, 21-23; Col D, 15,18-19	Grant	Sensitive contractual and competitive business information
47-2/1-4/3	Walker Revenue Client	1	1; Col A-C, 1-38	Grant	Sensitive contractual and competitive business information
47-2/1-4/4	Payment Coupon/Walker Revenue Client	1	2; Col A, 5,27,30-32; Col B, 9,19; Col C, 29; Col D, 29,34	Grant	Sensitive contractual and competitive business information
47-2/1-4/4	Payment Coupon/Walker Revenue Client	2	1; Col A-C, 3-38	Grant	Sensitive contractual and competitive business information
48-1	Transmission of Electric by Others	1	Col A, 1-11	Grant	Sensitive contractual and competitive business information

Documents 03799-05 and 04083-05

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
48-1/1	Transmission of Electric by Others	1	Col A, 1; Col B, 2-13; 4-13	Grant	Sensitive contractual and competitive business information
48-1/1-1	Florida Power Corp	1	Col A, 1-2; Col F, 5-60	Grant	Sensitive contractual and competitive business information
48-1/1-1	Florida Power Corp	2	Col A, 1-2,15,17; Col E, 5-13	Grant	Sensitive contractual and competitive business information
48-1/2	Transmission of Electric by Others	1	Col A-B, 1-39	Grant	Sensitive contractual and competitive business information
48-1/2	Transmission of Electric by Others	2	Col A, 1-24A,29-34A	Grant	Sensitive contractual and competitive business information
48-1/2-1	IEA Invoice	1	Col A, 1,29-30; Col B, 6-27	Grant	Sensitive contractual and competitive business information
48-1/3	LG & E Energy Marketing Invoice	1	Col A, 18-20; Col B, 5-17	Grant	Sensitive contractual and competitive business information
48-1/4	EMT Transmission	1	Col A-B, 4-15; Col D, 15-21,25-28 Col E, 28; Col F 29-36	Grant	Sensitive contractual and competitive business information
48-1/4-1	Reliant Energy Service	1	Col A, 1; Col B, 5-62	Grant	Sensitive contractual and competitive business information
48-1/5	EMT Transmission	1	Col D, 24-27 Col E-F, 4-12;	Grant	Sensitive contractual and competitive business information
48-1/5	EMT Transmission	2	Col A, 2-8	Grant	Sensitive contractual and competitive business information
52-1/2	Security Sample Testing	1	Col A-B, 2-12, 14-22,27-29; Col C, 2-12,14-22,26-29	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	2	Col A-C, 2-8, 13-23,27-28,30-38; Col D, 27-30	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	3	Col A-C, 2-10, 14-18,20-25,27-34	Grant	Sensitive contractual and security information
Documents 03799-05 and 04083-05					

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
52-1/2	Security Sample Testing	4	Col A, 2-25,27-36; Col B, 2-25,27-36, 42 Col C, 2-25,27-36, 40,42	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	5	Col A, 3,5-7,9-10, 12,14-15,17,19-24, 29 Col B, 3,5-7,9-10, 12,14-15,17,19-24, 28 Col C, 3-7,10,12, 14-15,17,19-24	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	6	Col A-C, 3,5-6,8, 10-26,30-36	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	7	Col A-C, 2-14, 16-30,32-46;	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	8	Col A, 2-4,6-12, 14-16,18-20,24-28, 30-38; Col B, 2-4,6-12, 15-16,18-20,24-28,30-38; Col C, 2-4,6-12, 14-16,18-20, 24-28,30-38	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	9	Col A-C, 2-9, 11-22,26-30,32-35, 37-38; Col D, 18-25	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	10	Col A-C, 1-39	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	11	Col A-C, 1-31	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	12	Col A-C, 1-7,9-19, 21-45	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	13	Col A, 2-6,8-20, 22-26,30-35,37-40; Col B-C, 8-20, 22-26,30-35,37-40	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	14	Col A-C, 1-4,6-8, 10-11,13-22,24-29, 31-38	Grant	Sensitive contractual and security information
Documents 03799-05 and 04083-05					

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
52-1/2	Security Sample Testing	5	Col A-C, 2-21, 23-24,26-36, 38-39,41-42	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	6	Col A-C, 2-5,9-31, 33-38,40-42	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	17	Col A-C, 2-23, 25-30,32-46	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	18	Col A-C, 1-6,8-20, 22,24,26-37,39; Col D, 1-4	Grant	Sensitive contractual and security information
52-1/2	Security Sample Testing	19	Col A, 1-9,11; Col B, 1-9,11-12, 14-15; Col C, 1-9,12-15; Col D, 11-17	Grant	Sensitive contractual and security information
52-1/3-1	SJRPP Security Project	1	5-9,17,22,28,31, 33,35-40	Grant	Sensitive contractual and security information
52-1/3-1	SJRPP Security Project	2	Col A-C, 2,4; Col D, 3,5; Col E, 8-9	Grant	Sensitive contractual and security information
52-1/3-1/1	SJRPP Security Project	1	2; Col A, 1-9,11; Col B, 1-11	Grant	Sensitive security information
52-1/3-1/2	SJRPP Security Project	1	1-3,6	Grant	Sensitive contractual and security information
52-1/3-1/2	SJRPP Security Project	2	1-5	Grant	Sensitive contractual and security information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Classified Confidential
2-1/3-1/2	JRPP Security Project	3	Col A, 2,5,10,12, 17,19,21-25,27,29, 32-36,38,40; Col B, 2,5,10,12, 17,19,21-25,29, 32-35,38,40; Col C-D, 2,5,10,12, 17,19,21-23,25,29, 32-35,38,40; Col E, 2,5,10,19, 21-23,25,29,32-35, 38,40; Col F 2,5,10,12,17, 19,21-23,25,27,29, 32-36,38,40	Grant	Sensitive contractual and security information
52-1/3-1/3	SJRPP Security Project	1	Col A, 1-10; Col B, 1-9,11-13	Grant	Sensitive contractual and security information
52-1/3-1/3	SJRPP Security Project	2	3-16,18-21	Grant	Sensitive contractual and security information
52-1/3-1/3	SJRPP Security Project	3	Col A, 1-10; Col B, 1-9,11-13	Grant	Sensitive contractual and security information
52-1/5	Security Sample Testing	1	Col A-C, 1,6,8,10, 14-15,17-20;	Grant	Sensitive contractual and security information
52-1/5	SJRPP Security Project	2	Col A-C, 1-12, 14-20,22-28,32	Grant	Sensitive contractual and security information
52-1/5	SJRPP Security Project	3	Col A-C, 1-5,7-20, 26-28,31-32,36; Col D, 26-29	Grant	Sensitive contractual and security information
52-1/5	SJRPP Security Project	4	Col A-C, 1,4-6, 9-11,15,17-19, 21-26; Col D, 2,4-6,21	Grant	Sensitive contractual and security information
52-1/9	SJRPP Security Project	3	Col A, 1-20	Grant	Sensitive security information
52-1/9	SJRPP Security Project	15	Col A, 1-15	Grant	Sensitive security information
52-1/9	SJRPP Security Project	17	Col A, 1-6	Grant	Sensitive security information
52-1/9	SJRPP Security Project	18	Col A, 1-4	Grant	Sensitive security information
52-1/9	SJRPP Security Project	22	Col A, 1-2	Grant	Sensitive security information
52-1/9	SJRPP Security Project	23	Col A, 1-4	Grant	Sensitive security information

Documents 03799-05 and 04083-05

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
52-1/9	SJRPP Security Project	25	Col A, 1-18	Grant	Sensitive security information
52-1/9	SJRPP Security Project	29	Col A,1-2	Grant	Sensitive security information
52-1/9	SJRPP Security Project	31	Col A, 1-8	Grant	Sensitive security information
52-1/9	SJRPP Security Project	37	Col A, 1-6	Grant	Sensitive security information
52-1/9	SJRPP Security Project	38	Col A, 1-10	Grant	Sensitive security information
52-1/9	SJRPP Security Project	39	Col A, 1-5	Grant	Sensitive security information
52-1/9	SJRPP Security Project	40	Col A, 1-3	Grant	Sensitive security information
52-1/9	SJRPP Security Project	41	Col A, 1-2	Grant	Sensitive security information
52-1/9	SJRPP Security Project	46	Col A, 1-12	Grant	Sensitive security information
52-1/11-1	Security Vehicles	1	5-6,8,10,12,14	Grant	Sensitive security information

A temporary copy of this recommendation will be held at I:04083-05fplraf.doc for a short period.

CC: Division of Regulatory Compliance and Consumer Assistance (Welch)
Division of Commission Clerk and Administrative Services (Flynn)