



Florida Power & Light Company, 215 S. Monroe St., Suite 810, Tallahassee, FL 32301

ORIGINAL

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March 13, 2006

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COMMISSION
CLERK

VIA HAND DELIVERY

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

060224-EI

**Re: Florida Power & Light Company's Request for Confidential
Classification of Materials Provided in Connection with the FPL Connect
Service Audit, RCA #05-285-4-1**

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 of Materials Provided in Connection with the FPL Connect Service Audit, RCA #05-285-4-1. 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 marked "Exhibit A - CONFIDENTIAL DOCUMENTS." Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. 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.

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. Please contact me if you have questions regarding this filing.

Sincerely,

Natalie F. Smith

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL 1
- OPC _____
- RCA 1
- SCR _____
- SGA _____
- SEC 1
- OTH 1 conf records

NFS:ec
Enclosures
an FPL Group company

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Confidential) DOCKET NO. 060224-EI
Classification of Materials Provided)
In Connection with the FPL Connect)
Service Audit, RCA #05-285-4-1)
_____) Filed: March 13, 2006

**REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF MATERIALS PROVIDED IN
CONNECTION WITH THE FPL CONNECT SERVICE AUDIT, RCA #05-285-4-1**

NOW, BEFORE THIS COMMISSION, through the undersigned counsel, comes Florida Power & Light Company ("FPL") and, pursuant to Rule 25-22.006, Florida Administrative Code, and Section 366.093 of the Florida Statutes, hereby requests confidential classification of certain work papers provided to the Florida Public Service Commission ("FPSC" or "Commission") staff ("Staff") in connection with the FPL Connect Service Audit, RCA #05-285-4-1 (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, II
Florida Power & Light Company
Vice President
215 South Monroe Street, Suite 810
Tallahassee, Florida 32301-1859
(850) 521-3900 Telephone
(850) 521-3939 Facsimile

R. Wade Litchfield, Associate General Counsel
Natalie F. Smith, Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
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2. During the FPL Connect Service Audit, Staff requested access to various FPL reports and other documents. By letter dated February 20, 2006, Staff indicated its intent to retain certain audit work papers. Pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, FPL was given 21 days from the date of the letter, or until March 13, 2006, to file a formal request for confidential classification with respect to such work papers.

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

(a) 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. Exhibit A is submitted separately in a sealed folder marked “**CONFIDENTIAL.**”

(b) Exhibit B consists of edited versions of all documents for which FPL seeks confidential treatment. All information for which FPL requests confidential treatment has been redacted in 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) Composite Exhibit D includes the affidavits of C. Dennis Brandt and Terry J. Keith in support of this request.

4. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. To the best of FPL’s knowledge, the highlighted information has not been publicly disclosed.

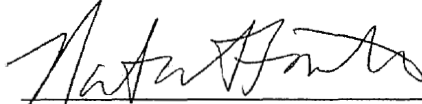
Pursuant to Section 366.093, Florida Statutes, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission 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. As the affidavits comprising Exhibit D indicate, certain highlighted information consists of information competitively sensitive insofar as the information relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information, if made public, would cause harm to FPL's customers and business operations and/or would impair the competitive business of the provider of the information. In addition, certain highlighted information also includes customer-specific account information. FPL has a 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 determinants (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 without the permission of the customer. This information is protected by Section 366.093(3)(e).

6. 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 a period of 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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