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COMMISSION
CLERK

DATE: October 26, 2006

TO: Lisa Bennett, Attorney, General Counsel

FROM: Division of Regulatory Compliance and Consumer Assistance (Freeman, Vandiver) ^F ^a

RE: Docket 060001-EI, Recommendation concerning Florida Power & Light Company's (FPL) request for confidential classification concerning a portion of the staff working papers prepared during "FPL Capacity Cost Recovery Clause Audit for the Year Ended December 31, 2003", Audit Control No. 04-022-4-1, Documents Numbered 07270-04, 07271-04, 07272-04 and 07442-04

On June 17, 2004, when copies of certain portions of staff's audit working papers obtained or prepared during the "FPL Capacity Cost Recovery Clause Audit for the Year Ended December 31, 2003", 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 July 2, 2004, staff filed documents 07270-04, 07271-04, and 07272-04 consisting of those specified portions of the staff working papers.

On July 8, 2004, FPL filed a request pursuant to Section 366.093, Florida Statutes (F.S), and Rule 25-22.006, FAC, 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 07443-04) and highlighted copies (document 07442-04).

On October 28, 2004, Commission Order No. PSC-04-1060-CFO-EI, granted FPL's request.

On April 28, 2006, FPL requested that the confidential classification period granted by Commission Order No. PSC-04-1060-CFO-EI, be extended for an additional 18 months.

Documents 07270-04, 07271-04, 07272-04 and 07442-04 are currently held by the Commission's Division of the Commission Clerk and Administrative Services as confidential pending resolution of FPL's request for extension of the classification period.

Pursuant to Section 119.07, F.S., documents submitted to this Commission are public records. The only exceptions to this law are specific statutory exemptions and exemptions granted by governmental agencies pursuant to the specific items of a statutory provision. Subsections 366.093(3)(c)(d) and (e), F.S., Subsection 163.01(15)(m), F.S., and Subsection 119.071(5)(b), F.S., provide the following exemptions.

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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:

....

(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....”

Subsection 163.01(15)(m), F.S., provides; “In the event that any public agency or any such legal entity, or both, should receive, in connection with its joint ownership or the right to the services, output, capacity, or energy of an electric project, ...any material which is designated by the person supplying such material as proprietary confidential business information or which a court of competent jurisdiction has designated as confidential and shall be exempt from s. 119.07(1). As used in this paragraph, ‘proprietary confidential business information’ includes but shall not be limited to, trade secrets; internal controls and reports of internal auditors; security measures, systems or procedures; information concerning bids or other contractual data, the disclosure of which would impair the efforts of the utility to contract for services on favorable terms; employee personnel information unrelated to compensation, duties qualifications, or responsibilities; and formulas, patterns devices, combinations of devices, contract costs, or other information the disclosure of which would injure the affected entity in the workplace.”

Subsection 119.071(5)(b), F.S., provides: “Bank account numbers and debit, charge and credit card numbers held by an agency are exempt from subsection (1) and s. 24(a) Art. I of the State Constitution. This exemption applies to bank account numbers and debit, charge and credit card numbers held by an agency before, on, or after the effective date of this exemption. This paragraph is subject to the Open Government Sunset Review Act of 1995 in accordance with S. 119.15, and shall stand repealed on October 2, 2007, unless reviewed and saved from repeal through reenactment by the Legislature.”

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

We note there were two technical errors in the filing. The affidavit of Gerald J. Yupp refers to the wrong audit and the affidavit of Walter E. Gwinn, Manager of Financial Performance in the Nuclear Business Unit, replaces the assertions made in 2004 by John Hartzog, FPL Manager of Nuclear Financial and Information Services. These errors were confirmed with the utility as strictly technical in nature and the errors do not affect the utility's request which is discussed in this memorandum.

Reading the FPL filing reveals the sensitive material consists of:

1. Customer-specific account information

FPL asserts that customer-specific information to include banking account numbers should be granted an extension of confidential classification on the basis that the information is not stale or public and release of this information would harm competitive business interests. Subsection 366.093(e), F. S., provides that the Commission may grant a confidential classification to sensitive information concerning competitive business interests if release of that information will harm the provider of that information.

FPL witness Korel M. Dubin, FPL Regulatory Affairs Department, Manager of Regulatory Issues, identifies materials associated with customer-specific account information to include bank account information as reported within staff working papers entitled: "Billing Factor." Ms. Dubin states FPL treats customer-specific information as confidential to include: customer names, addresses, telephone numbers, account numbers, rates, billing determinants (kW and kWh usage), conservation savings in kW, kWh and bills.

The Commission has granted a confidential classification to customer-specific account information and associated usage in a number of previous decisions for terms longer than 18 months (See Commission Order No. PSC 03-1437-CFO-EI, dated December 16, 2003, Docket 030002-EG). After reading the information identified by witness Durbin, we recommend that this customer-specific account information including banking account information be held as confidential because the information meets the definition of "proprietary confidential business information" set out in Section 366.093, Florida Statutes, in that release of this privately-held sensitive information would cause the provider of that information harm.

Furthermore, the audit working papers contain bank account numbers which are confidential *per se* pursuant to Section 119.071(5)(b), F.S.

2. Contractual data such as pricing and other terms, payment records and vendor and supplier rates.

Subsection 366.093(d), F. S., provides that the Commission may grant a confidential classification to sensitive contractual information to include bidding information if release of that information will impair the ability of the utility or its affiliates to contract on favorable terms.

Subsection 366.093(e), F. S., provides that the Commission may grant a confidential classification to sensitive competitive business information if release of that information will harm competitive business of the provider of that information.

Witness Gerald J. Yupp, FPL Energy Marketing and Trading Division, Director of Wholesale Operations, reports that release of this information would impair FPL's competitive business interests and ability to contract on favorable terms. Also, witness Yupp indicates some of the information reports FPL's internal company procedures which are sensitive. Mr. Yupp identifies the information associated with sensitive contractual and competitive business interests as reported within staff working papers entitled: "Transmission Revenue", "Transmission Entry", "Multi Hour", "Invoice", "Invoice Payment", "Interchange", "Jan 2003 Actual", "Agreement", "January Estimate/Actual", "December 2002 Estimate/Actual", "December 2002 Actual", "Transmission", "Estimate Transmission", "Estimate/Actual Transmission" and "Sample Testing."

FPL pleads that release of this contractual data would impair the ability of FPL to contract with vendors for goods and services on favorable terms. FPL also asserts release of this competitive information would harm the contractors and vendors by providing competitors an unfair advantage in future competitions for both FPL and non-FPL contracts.

After reading the material identified by witness Yupp, we agree that release of this material would reasonably be expected to impair the ability of FPL or its affiliates to contract favorably for goods and services and release of this material could impair competitive business of FPL or the involved vendors and contractors. The commission has previously recognized that contractual material may be sensitive for a long period (See Commission Order No. PSC-94-1224-CFO-EI, Dated October 6, 1994, Docket No. 940001-EI). It is reasonable to expect that release of the fuel related information could harm the efforts of the utility in obtaining fuel in the future; therefore, we recommend that the material be granted a confidential classification for an additional 18 months on the basis that the sensitive contractual and competitive business information meets the exemptions provided by Subsections 366.093(3)(d) and (e), Florida Statutes.

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Florida Power & Light Request for Extension

3. Sensitive competitive business information, release of which would cause harm to the competitive businesses of the provider of the information to include information concerning St. Johns River Power Park (SJRPP), a Jacksonville Electric Authority (JEA) and FPL venture.

Section 163.01(15)(m), Florida Statutes allows sensitive contractual or other information to be considered for a confidential classification where release of the information would harm "the affected entity in the marketplace". Qualifying entities would include St. Johns River Power Park.

Section 366.093(e), F.S., allows the Commission to grant a confidential classification to sensitive competitive business information, if release of that information would harm the competitive business of the provider of that information. As described above, the Commission has also found that contractual and business information could remain sensitive beyond 18 months.

Witness Osvaldo J. Lom, FPL Supervisor Purchase Power Contracts, identifies the information associated with sensitive competitive business interests to include materials associated with St. Johns River Power Park within staff working papers entitled: "Cost of Operations", "Carrying Inventory", "Debt Service", "Revenue Requirements", "Debt Service Payment", "Transmission Capability", "CCRA", "Property Tax", "Dismantlement", "Deferred Interest", "Invoice", "Cost of Inventory", "Cost of Operations", "Carrying Cost of Inventory", "Accrual Adjustment", "Suspension Accrual", "Recalculation -- Cost of Operations", "QF Estimate", "QF Payment", "Capacity Payment", and "QF Actual."

FPL asserts that "other information is claimed as commercially sensitive data, the disclosure of which would impair the competitive interests of FPL and its vendors. Certain proprietary information concerns St. Johns River Power Park. . . .JEA maintains this information as confidential pursuant to Section 163.01(15)(m), Florida Statutes, and the disclosure of this information would injure JEA in the marketplace. Certain of the information for which confidential information is sought would also place JEA at a disadvantage when coupled with other information that is publicly available. The information described. . .is protected from disclosure by Section 366.093(3)(e)."

After reading the material identified by FPL Witness Lom we agree release of the information may impair the competitive business of FPL or JEA. We also note that FPL asserts that JEA holds this material as confidential pursuant to the provisions of Section 163.01(15)(m), F.S. Therefore since the information is held as confidential by both FPL and JEA and any release of the information would cause harm to the competitive business of the provider of that information, we recommend the information be granted an extension of confidential classification.

4. Information concerning security measures and the negotiated agreements for the protection of FPL facilities.

Section 366.093(c), F.S. provides that the Commission may grant a confidential classification to security measures, systems, or procedures.

Section 366.093(d), F.S., provides that the Commission may grant a confidential classification to sensitive contractual or bid information if release of the information will impair the ability of the utility or its affiliates to contract on favorable terms.

FPL asserts that “this information, if made public, would disclose certain of FPL’s security measures, systems or procedures...” FPL witnesses Pamela L. Sonnelitter, General Manager of Business Services in the Power Generation Division, and Walter E. Gwinn, FPL Manager of Financial Performance in the Nuclear Business Unit, also add that release of the sensitive associated contractual information would impair the ability of FPL to enter into contracts on commercially favorable terms.

Witness Sonnelitter identifies this sensitive security and related sensitive contractual information as contained in staff audit working papers: “FINS 506.075”, “Invoice”, “Request 28”, and “FINS 549.075.”

Witness Hartzog identifies this sensitive security and related sensitive contractual information as contained in staff audit working papers: “FINS Cash Voucher”, “Cash Voucher Sample”, “FINS Journal Voucher”, “Vehicle Sample Item”, and “Vehicle Usage.”

We agree that even after an 18 month period, this information remains sensitive.

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 information meets the definition of “confidential proprietary business information” set out in section 366.093(3), F.S. Witnesses Dubin, Yupp, Lom, Sonnelitter and Gwinn 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

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 an extension of confidential classification for 18 months.

A detailed recommendation, as found, follows:

Detailed Recommendation, As Found

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 07270-04 and 07442-04					
41-2/4	Billing factor	1	Col B, 1-2	Grant	Specific customer account information
41-2/4	Billing factor	2	Col B, 1-46	Grant	Specific customer account information
41-2/4	Billing factor	3	Col B, 1-17	Grant	Specific customer account information
41-2/4	Billing factor	4	Col B, 1-46	Grant	Specific customer account information
41-2/4	Billing factor	5	Col B, 1	Grant	Specific customer account information
41-2/4	Billing factor	6	Col B, 1-50	Grant	Specific customer account information
41-2/4	Billing factor	7	Col B, 1-35	Grant	Specific customer account information
41-2/4	Billing factor	8	Col B, 1-50	Grant	Specific customer account information
41-2/4	Billing factor	9	Col B, 1-48	Grant	Specific customer account information
41-2/4	Billing factor	10	Col B, 1-47	Grant	Specific customer account information
41-2/4	Billing factor	11	Col B, 1-3	Grant	Specific customer account information
41-2/4	Billing factor	12-13	Col B, 1-42	Grant	Specific customer account information
41-2/4	Billing factor	14	Col B, 1-15	Grant	Specific customer account information
41-2/4	Billing factor	15	Col B, 1A-4A,1-23	Grant	Specific customer account information
41-2/4	Billing factor	16	Col B, 1-3	Grant	Specific customer account information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 07270-04 and 07442-04					
41-2/5	Billing factor	2	Col A, 3; Col AA, 5-7;10-13, 15-24,26-30; Col B, 3,6,10-12, 15-16; Col C, 8-9,21A, 22A,24A,27A,28A; Col D, 8-9,21A, 22A,24A-28A; Col E, 8-9, 19A,21A,22A, 26A-29A; Line 31	Grant	Specific customer account information
41-2/5	Billing factor	3	Col A, 3; Col AA 5-7, 10-13, 15-24,26-30; Col B, 3,6,10-12, 15-16; Col C, 8-9,19A, 20A,22A,25A,26A; Col D, 8-9,19A, 20A,22A-26A; Col E, 8-9,17A, 19A,20A, 24A-26A,31A; Line 31	Grant	Specific customer account information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 07270-04 and 07442-04					
41-2/5	Billing factor	4	Col A, 2-3; Col B, 2-4,12-14, 17-18; Col C, 9-10,12-14, 17-18,21-28,32-35, 42-49; Col E, 12-14, 17-18,30-31; Col F, 9-10,12-15, 17-18,20-29,32-38, 40-49; Line 19	Grant	Specific customer account information
41-2/5	Billing factor	6	Col A, 2-3; Col B, 2-4,12-14, 17-18; Col C, 9-10,12-14, 17-18,21-28,32-35, 42-49; Col E, 12-14, 17-18,30-31; Col F, 9-10,12-15, 17-18,20-29,32-38, 40-49; Line 19	Grant	Specific customer account information
41-2/5	Billing factor	7	Col A, 2-3; Col B, 2-4,12-14, 17-18; Col C, 9-10,12-14, 17-18,21-28,32-35, 42-49; Col E, 12-14, 17-18,30-31; Col F, 9-10,12-15, 17-18,20-29,32-38, 40-49; Line 19	Grant	Specific customer account information
42-1/1	Transmission revenue	2	Cols A-F, 10; Cols G-J, 4	Grant	Sensitive contractual and competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 07270-04 and 07442-04					
42-1/2-1/1	Transmission entry	1	Cols G-H, 1-6,9-27	Grant	Sensitive competitive business information
42-1/2-8/2	Multi hour	1	1,3,24	Grant	Sensitive contractual information
42-1/2-8/3	Invoice	1	1,5,18,26	Grant	Sensitive competitive business information
42-1/2-8/3	Invoice	2	Col C, 3-38; Cols D-F, 3,6,9,12, 15,18,21,24,27,30, 33,36	Grant	Sensitive competitive business information
42-1/2-8/3	Invoice	3	Col C, 3-43; Cols D-F, 3,5,7,10, 13,16,19,22,24,27, 30,33,35,38,41	Grant	Sensitive competitive business information
42-1/2-8/3	Invoice	4	Col C, 3-20; Cols D-F, 3,6,9,12, 15,18	Grant	Sensitive competitive business information
42-1/2-8/4	Invoice payment	1	Col C, 1 Cols D,H, 2-22, 25-37	Grant	Sensitive competitive business information
42-1/4-1	Invoice	1	1,5,19,26	Grant	Sensitive competitive business information
42-2/1-4	Interchange	1	Col G, 1-4,7-27	Grant	Sensitive contractual and competitive business information
42-2/1-4	Interchange	2	Cols G,O, 8-11,13, 16-22,24-26,28-30, 32-33,35,37-39; Col R 10-11,16-21, 24-26,28-30,32-33, 35,37-39	Grant	Sensitive contractual and competitive business information
44-1/1-1	Cost of operations	1	All	Grant	Sensitive competitive information
44-1/1-2	Carrying inventory	1	All	Grant	Sensitive competitive information
44-1/1-3	Cost of operations	1	All	Grant	Sensitive competitive information
44-1/1-4	Carrying inventory	1	All	Grant	Sensitive competitive information
44-1/1-5/1	Debt service	1	Col A, 27-28; Col B, 6-9,27-29; Col C, 27-29; Col D, 6-8	Grant	Sensitive competitive information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 07270-04 and 07442-04					
44-1/1-5/2	Revenue requirements	1-3	All	Grant	Sensitive competitive information
44-1/1-5/3	Revenue requirements	1-3	All	Grant	Sensitive competitive information
44-1/1-5/4	Debt service payment	1	Col A, 8-11	Grant	Sensitive competitive information
44-1/1-5/4-1	Debt service	1	All	Grant	Sensitive competitive information
44-1/1-5/5	Debt service	1	Col A, 8-11	Grant	Sensitive competitive information
44-1/1-5/5-1	Debt service	1	All	Grant	Sensitive competitive information
44-1/1-5/6	Transmission capability	1	Col A, 26-27 Col B, 7-8,26-28	Grant	Sensitive competitive information
44-1/1-5/6-1	Transmission capability	1	Col A, 7-11	Grant	Sensitive competitive information
44-1/1-5/6-1/1	Transmission capability	1	All	Grant	Sensitive competitive information
44-1/1-5/6-2	Transmission capability	1	Col A, 6-10	Grant	Sensitive competitive information
44-1/1-5/6-2/1	Transmission capability	1	All	Grant	Sensitive competitive information
44-1/1-5/7	CCRA	1	2-3,13-14,23-24	Grant	Sensitive competitive information
44-1/1-5/7-1	CCRA	1	Col A, 7-10	Grant	Sensitive competitive information
44-1/1-5/8	Property tax	1	1	Grant	Sensitive competitive information
44-1/1-5/9	Dismantlement	1	All	Grant	Sensitive competitive information
44-1/1-5/9-1	Dismantlement	1	All	Grant	Sensitive competitive information
44-1/1-5/10	Deferred interest	1	All	Grant	Sensitive competitive information
44-1/1-5/10-1	Deferred interest	1	All	Grant	Sensitive competitive information
44-1/1-6	Invoice	1	11-13	Grant	Sensitive competitive information
44-1/1-6/1	Cost of inventory	1	All	Grant	Sensitive competitive information
44-1/1-7	Cost of operations	1	All	Grant	Sensitive competitive information
44-1/1-7/1	Cost of operations	1	Col A, 7-10	Grant	Sensitive competitive information
44-1/1-7/2	Cost of operations	1	Col A, 7-10	Grant	Sensitive competitive information
44-1/1-7/3	Cost of operations	1	All	Grant	Sensitive competitive information
44-1/1-7/4	Cost of operations	1	All	Grant	Sensitive competitive information
44-1/2-1	Cost of operations	1	All	Grant	Sensitive competitive information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 07270-04 and 07442-04					
44-1/2-2	Carrying cost of inventory	1	All	Grant	Sensitive competitive information
44-1/2-3	Cost of operations	1	All	Grant	Sensitive competitive information
44-1/2-4	Carrying cost of inventory	1	All	Grant	Sensitive competitive information
44-1/2-5	Debt service	1	All	Grant	Sensitive competitive information
44-1/2-5/1	Debt service	1	Col A, 3-5;22-23; Col B, 7-8,22; Col D, 7-8	Grant	Sensitive competitive information
44-1/2-5/1	Debt service	2	Cols B,D, 6-7	Grant	Sensitive competitive information
44-1/2-5/1-1	Debt service	1-3	All	Grant	Sensitive competitive information
44-1/2-5/1-2	Debt service	1	Col A, 7-10	Grant	Sensitive competitive information
44-1/2-5/1-2	Debt service	2	All	Grant	Sensitive competitive information
44-1/2-5/2	Accrual adjustment	1	All	Grant	Sensitive competitive information
44-1/2-5/3	Transmission capability	1	Col A, 20-21; Col B, 6,20,22; Col D, 6	Grant	Sensitive competitive information
44-1/2-5/3	Transmission capability	2	Cols A, 6,20-21 Cols B,D, 6	Grant	Sensitive competitive information
44-1/2-5/3-1	Transmission capability	1	Col A, 6-10	Grant	Sensitive competitive information
44-1/2-5/3-1	Transmission capability	2	All	Grant	Sensitive competitive information
44-1/2-5/4	CCRA	1	2-4,13-14	Grant	Sensitive competitive information
44-1/2-5/4-1	CCRA	1	Col A, 6-9	Grant	Sensitive competitive information
44-1/2-6	Invoice	1	All	Grant	Sensitive competitive information
44-1/2-6/1	Cost of inventory	1	All	Grant	Sensitive competitive information
44-1/2-7	Cost of operations	1	All	Grant	Sensitive competitive information
44-1/2-7/1	Cost of operations	1	Col A, 7-10	Grant	Sensitive competitive information
44-1/2-7/2	Cost of operations	1	Col A, 6-9	Grant	Sensitive competitive information
44-1/3-1	Suspension accrual	1	All	Grant	Sensitive competitive information
44-2	Recalculation – cost of operations	1	All	Grant	Sensitive competitive information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 07270-04 and 07442-04					
44-2/1	Cost Of operations	1-13	All	Grant	Sensitive competitive information
Documents 07271-04 and 07442-04					
46-1/1-1	QF estimate	1	All	Grant	Sensitive competitive information
46-1/1-2	QF actual	1	All	Grant	Sensitive competitive information
46-1/1-2/1	QF payment	1	Col A, 8-12	Grant	Sensitive competitive information
46-1/1-2/1	QF payment	3	All	Grant	Sensitive competitive information
46-1/1-2/2	QF payment	1	Col A, 8-12	Grant	Sensitive competitive information
46-1/1-2/2	QF payment	3	All	Grant	Sensitive competitive information
46-1/1-2/3	QF payment	1	Col A, 8-12	Grant	Sensitive competitive information
46-1/1-2/3	QF payment	3	All	Grant	Sensitive competitive information
46-1/1-2/4	QF payment	1	Col A, 8-13	Grant	Sensitive competitive information
46-1/1-2/4	QF payment	3	All	Grant	Sensitive competitive information
46-1/1-2/5	QF payment	1	Col A, 8-11	Grant	Sensitive competitive information
46-1/1-2/5	QF payment	3	All	Grant	Sensitive competitive information
46-1/1-2/6	QF payment	1	Col A, 8-13	Grant	Sensitive competitive information
46-1/1-2/6	QF payment	3	All	Grant	Sensitive competitive information
46-1/1-2/6-1	Capacity payment	1	All	Grant	Sensitive competitive information
46-1/1-2/7	QF payment	1	Col A, 9-12	Grant	Sensitive competitive information
46-1/1-2/7	QF payment	3	All	Grant	Sensitive competitive information
46-2/1-1	QF estimate	1	All	Grant	Sensitive competitive information
46-2/1-2	QF actual	1	All	Grant	Sensitive competitive information
46-2/1-2/1	QF payment	1	Col A, 8-12	Grant	Sensitive competitive information
46-2/1-2/1	QF payment	3	All	Grant	Sensitive competitive information
46-2/1-2/2	QF payment	1	Col A, 8-12	Grant	Sensitive competitive information
46-2/1-2/2	QF payment	3	All	Grant	Sensitive competitive information
46-2/1-2/3	QF payment	1	Col A, 8-12	Grant	Sensitive competitive information
46-2/1-2/3	QF payment	3	All	Grant	Sensitive competitive information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 07271-04 and 07442-04					
46-2/1-2/4	QF payment	1	Col A, 8-13	Grant	Sensitive competitive information
46-2/1-2/4	QF payment	3	All	Grant	Sensitive competitive information
46-2/1-2/5	QF payment	1	Col A, 8-11	Grant	Sensitive competitive information
46-2/1-2/5	QF payment	3	All	Grant	Sensitive competitive information
46-2/1-2/6	QF payment	1	Col A, 8-13	Grant	Sensitive competitive information
46-2/1-2/6	QF payment	3	All	Grant	Sensitive competitive information
46-2/1-2/6-1	Capacity payment	1	All	Grant	Sensitive competitive information
46-2/1-2/7	QF payment	1	Col A, 9-12	Grant	Sensitive competitive information
46-2/1-2/7	QF payment	3	All	Grant	Sensitive competitive information
47-1/1-1	Transmission	1	Col A, 18,27; Col E, 5,24,27; Col F, 5,8; Col G, 5; Col H, 24,26	Grant	Sensitive contractual and competitive business information
47-1/1-1/1-1	Jan 2003 actual	2	Col A, 1; Col F, 5-59	Grant	Sensitive contractual information
47-1/1-1/2-1	January 2003 actual	3	Col A, 1; Col F, 5-15,18-40	Grant	Sensitive contractual information
47-1/1-1/3	January 2003 actual	1	1,3,5-6	Grant	Sensitive contractual and competitive business information
47-1/1-1/3-1	Agreement	1-2	All	Grant	Sensitive contractual and competitive business information
47-1/1-1/3-1	Agreement	3	1-3; Col F, 5-62	Grant	Sensitive contractual and competitive business information
47-1/1-2	Jan -- estimate/actual	1	Col A, 3,6,9,12,19; Col B, 1-2,4-5,7-8, 10-11,13-15,18,20; Col C, 1,5,7,11, 13-15,18,20	Grant	Sensitive contractual and competitive business information

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47-1/1-2/1	January 2003 Actual	1	7-10; Cols A,C, 13-14, 16-17,20-23; Col D, 13-14,16-25	Grant	Sensitive contractual and competitive business information
47-1/1-4	December 2002 estimate/actual	1	Col A,3,6,9,12,19; Col B, 1-2,4-5,7-8, 10-11,13,18,20; Col C, 1,5,7,11,13, 18,20	Grant	Sensitive contractual and competitive business information
47-1/1-4/1	Actual December 2002	1	7-9; Cols A,C, 12-13, 15-16,19-21 Col D, 12-13,15-25	Grant	Sensitive contractual and competitive business information
47-2/1-1	Transmission	1	Col A, 18,20, 22,30; Col D, 6,27,30; Col E, 6,9; Col F, 6	Grant	Sensitive contractual information
47-2/1-1/4	Estimate transmission	1	2; Col A, 8-11; Col B, 5-6,8-11; Col D, 5-6; Col E, 5-6,8-11, 14-15,19; Col F, 5-12, 14-15,19; Col G, 8-11,14-15; Col H, 8,10,14	Grant	Sensitive contractual and competitive business information
47-2/1-1/4-1	Agreement	1-2	All	Grant	Sensitive contractual and competitive business information
47-2/1-1/4-2	Agreement	1-2	All	Grant	Sensitive contractual and competitive business information

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47-2/1-2	Estimate/actual transmission	1	Col A, 5,8,11, 14,21; Col B,1,4,6,9,10, 12,15,20,22; Col C, 1-3,7,9,13, 15,20,22	Grant	Sensitive contractual and competitive business information
47-2/1-2/1	Invoice	1	3,5-7; Cols A,C, 9-10, 12-13,16-18,20-21; Col D, 9-10,12-18, 20-23	Grant	Sensitive contractual and competitive business information
47-2/1-3	Invoice	1	5,18,24	Grant	Sensitive contractual information
47-2/1-3	Invoice	2	Cols D,H, 1-20, 23-35	Grant	Sensitive contractual information
47-2/1-6	Estimate/actual transmission	1	Col A, 3,6,9,12,19; Col B, 1,2,4-5,7-8, 10-11,13,18-20; Col C, 1,5,7,11,13, 18,20	Grant	Sensitive contractual and competitive business information
47-2/1-6/1	Invoice	1	1-3; Cols A,C, 7-8, 10-11,14-16; Col D, 7-8,10-18	Grant	Sensitive contractual and competitive business information
47-2/1-8/1	Invoice payment	1	Col A, 1; Col F, 5-15,19-48	Grant	Sensitive contractual information
Document 07272-04 and 07442-04					
52-2/1	FINS 506.075	1	Col C, 4-6,11; Col D, 5	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	5	Cols H,K, 1-5, 7-8,12-15,17-20; Col M, 1-23; Col N, 16-20	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	6	Cols H,K, 1-16, 18-30,32-42; Col M, 1-43	Grant	Security measures and sensitive contractual information

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52-2/1	FINS 506.075	7	Cols H,K, 1-15, 19-27,29-42; Col M, 1-42; Col N, 29-41	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	8	Cols H,K, 1-45,47; Col M, 1-47; Col N, 29-41;46-50	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	9	Cols, H,K, 1-2, 4-47; Col M, 1-47; Col N, 1A,2A,1-11	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	10	Cols H,K, 1-8, 10-47; Col M, 1-47	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	11	Col H, 1-12,14,16, 18-32,34-41; Col K, 1-12,18-32, 34-41; Col M, 1-41; Col N, 18-19	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	12	Cols H,K, 1-41,45; Col M, 1-45	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	13	Col F, 15,19; Cols, I,L, 1-7,9, 11-12,14-16,18-20, 22-27,32-35; Col M, 31; Col N, 1-30,32-35; Col O, 8-12,31-36	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	14	Cols H,K, 2,4,6, 8-15,19-24,26, 30-31; Col M, 1-31; Col N, 8-15,19-22	Grant	Security measures and sensitive contractual information

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Document 07272-04 and 07442-04					
52-2/1	FINS 506.075	15	Col F, 5,9; Col I, 2-3,5,7-12, 14-23,27-28,30,32-34; Col L, 2-3,5,8-12, 14-23,27-28,30, 32-34; Col N, 1-34; Col O, 1-6	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	16	Col E, 32; Col H, 1-5,9,11-13, 15-28,33-35; Col K, 1-5,9,11-13, 17-28,33-35; Col M, 1-31,33-36	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	17	Col E, 15; Cols H,K, 1,3-6, 10-13,16,18-32; Col M, 1-14,16-35; Col N, 1-6	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	18	Col M, 1;	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	19	Col G, 1-3,5,9-10, 12-13,17,19-21; Col M, 1-21	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	20	Col G, 4-5,9,13,17, 19,23-24; Col M, 1-25	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	21	Col G, 1-2,6,8,10, 12,16-18,20-21; Col M, 1-25	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	22	Col O, 1,5,9,13,17; Col P, 1-19	Grant	Security measures and sensitive contractual information
52-2/1	FINS 506.075	23	Col P, 1-2	Grant	Security measures and sensitive contractual information

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52-2/1-1	Invoice	1	Col A, 2-6,9-23, 30-35; Col B, 1-7; Col C, 9-11; Col E, 19-23,25,28	Grant	Sensitive contractual information
52-2/1-1/1	Request 28	1	5-6	Grant	Security measures
52-2/1-2	Invoice	1	Col C, 2-15; Col D, 3-15; 16-19	Grant	Security measures and sensitive contractual information
52-2/1-2	Invoice	2	Col A, 1-3,6,17,19, 22,25,27,29,32,36; Col B,18,20-21, 23-24,26,28,30-31, 33-34,37 Col C, 6-8; 18, 20-21,23-24,26,28, 30-31,33-34,37 Col D,1, 18,20-21, 23-24,26,28,30-31, 33-34,37,39-41 Col E-J, 18,20-21, 23-24,26,28,30-31, 33-34,37 Lines 35,38,42-44	Grant	Security measures and sensitive contractual information

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52-2/1-2	Invoice	3	Col A, 1-3,6,17,20, 23,25,28,31; Col B,18-19,21-22, 24,26-27,29-30, 32-33; Col C, 6-8,18-19, 21-22,24,26-27, 29-30,32-33; Col D, 1, 18-19, 21-22,24,26-27, 29-30,32-33; Cols E-J, 18-19, 21-22,24,26-27, 29-30,32-33 Col L, 35-37; Lines 34,38-40	Grant	Security measures and sensitive contractual information
52-2/1-3	Invoice	1	Lines 1-3,5-8; Cols A-B, 12-19, 29; Col D, 12-19; Col E, 12-19, 25-29 Lines 20-22;	Grant	Security measures and sensitive contractual information
52-2/1-3	Invoice	2	4-7,10,12,25,37-40	Grant	Security measures and sensitive contractual information
52-2/1-3	Invoice	3	1-6,9-10,12-18, 20,24	Grant	Security measures and sensitive contractual information
52-3/1	FINS 549.075	1	Col C, 4; Line 11	Grant	Security measures and sensitive contractual information
52-3/1	FINS 549.075	5	Col E, 2; Cols H,K,M, 1-34;	Grant	Security measures and sensitive contractual information
52-3/1	FINS 549.075	6	Col E, 3,14,18-19, 23; Col H, 1-8,10-12, 14-15,17-18,21-42; Col M, 1-18,20-42; Col N, 12-16	Grant	Security measures and sensitive contractual information

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52-3/1	FINS 549.075	7	Col E, 31,33,39; Cols H,K, 1-27,31, 33,37-39; Col M, 1-39; Col N, 31-36,39; Lines 40-43	Grant	Security measures and sensitive contractual information
52-3/1	FINS 549.075	8	Col E, 4,13; Col H, 2,4,9,14,16, 18,20-26; Col K, 2,4,9,14,16, 18,21-26; Col M, 1-7,9-12, 14-29; Col N, 3-12,14-19	Grant	Security measures and sensitive contractual information
52-3/1	FINS 549.075	9	Col H, 1-2,4-7, 9-11,15-19,21-23; Col K, 1-2,5-7, 9-11,15-19,21-23; Col M, 1-27	Grant	Security measures and sensitive contractual information
52-3/1	FINS 549.075	10	Cols G-J, 1,5-6,10; Col M, 1-14	Grant	Security measures and sensitive contractual information
52-3/1-1	Invoice	1	2,9-11,13; Cols C-F, 15-29	Grant	Security measures and sensitive contractual information
52-3/1-1	Invoice	2	7; Cols C-F, 12-26	Grant	Security measures and sensitive contractual information
52-3/1-1	Invoice	3	7,22 Cols C-F, 12-21	Grant	Security measures and sensitive contractual information
52-4/4	FINS cash voucher	1-2	Col A, 1-8	Grant	Security measures and sensitive contractual information
52-4/4	FINS cash voucher	4	Col A, 1-5	Grant	Security measures and sensitive contractual information
52-4/4	FINS cash voucher	13	Col A, 1-5	Grant	Security measures and sensitive contractual information
52-4/4	FINS cash voucher	15	Col A, 1-24	Grant	Security measures and sensitive contractual information

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52-4/4	FINS cash voucher	20	Col A, 1-9	Grant	Security measures and sensitive contractual information
52-4/4	FINS cash voucher	21	Col A, 1-16	Grant	Security measures and sensitive contractual information
52-4/4-1/1	Cash voucher sample	1	Line 4; Col C, 11,20,29-31 Col E, 11,20,29-31 Col F, 11,31 Col G, 20,29-31 Col H, 3;	Grant	Sensitive contractual information
52-4/4-2	Cash voucher sample	1	Col A, 11-19, 23-31; Col C-F, 11-19	Grant	Sensitive contractual information
52-4/4-2	Cash voucher sample	2	15,18-20	Grant	Sensitive contractual information
52-4/4-3	Cash voucher sample	1	Col C,14-16; Col D,13; Col E, 13-16; Lines 21,26	Grant	Sensitive contractual information
52-4/4-3/1	Cash voucher sample	1	Cols E-F, 31,35,39	Grant	Sensitive contractual information
52-4/4-3/1	Cash voucher sample	2	Col D, 35,37; Cols E-F, 7,12, 17,30	Grant	Sensitive contractual information
52-4/4-3/1	Cash voucher sample	3	Cols E-F, 8,21,30	Grant	Sensitive contractual information
52-4/4-3/1	Cash voucher sample	4	Col D, 20-21,32; Cols E-F, 16,28	Grant	Sensitive contractual information
52-4/4-3/1	Cash voucher sample	5	Col D, 12; Cols E-F, 5,21,28	Grant	Sensitive contractual information
52-4/4-3/1	Cash voucher sample	6	Col D, 18; Cols E-F 11,28,40	Grant	Sensitive contractual information
52-4/4-3/1	Cash voucher sample	7	Col D, 9,11,21-22 Cols E-F, 17,34,41	Grant	Sensitive contractual information

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52-4/4-3/1	Cash voucher sample	8	Col D, 6; Col F, 13-14; Line 16	Grant	Sensitive contractual information
52-4/4-3/1-1	Cash voucher sample	1-6	All	Grant	Sensitive contractual information
52-4/4-3/1-2	Cash voucher sample	1-5	29	Grant	Sensitive contractual information
52-4/4-3/1-2	Cash voucher sample	6	25	Grant	Sensitive contractual information
52-4/5	FINS journal voucher	4	Col A, 1-13	Grant	Security measures and sensitive contractual information
52-4/6-1	Vehicle sample item	1	Col B, 5-6,8,10-11; Co C, 6,8; Col D, 5-6,8,10,11; Col F, 8	Grant	Sensitive contractual information
52-4/6-2	Vehicle usage	1	Col A, 1-45	Grant	Sensitive contractual information

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