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COMMISSION CLERK

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DATE: June 23, 2009
TO: Lisa Bennett, Attorney, General Counsel's Office
FROM: Division of Regulatory Compliance (Freeman, Mailhot) dm
RE: Docket 090001-EI, Recommendation concerning Florida Power & Light Company's (FPL) request for 2nd extension of 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).

On July 6, 2005, the Commission Issued Order No. PSC-05-0727-CFO-EI granting FPL's request for a confidential classification. The classification period was set at 18 months. That period tolled.

On January 5, 2007, FPL filed a request pursuant to Rule 25-22.006, FAC, and Section 366.093, F.S., for an extension of the confidential classification period.

On October 31, 2007, the Commission Issued Order No. PSC-07-0884-CFO-EI granting FPL's request for an extension of the confidential classification. The extension of the classification period was set at 18 months. That period has now tolled.

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On April 29, 2009, FPL filed a request pursuant to Rule 25-22.006, FAC, and Section 366.093, F.S., for a 2nd extension of the confidential classification period for selected portions of the sensitive information.

Documents 03798-05, 03799-05 and 04083-05 are currently held by the Office of the Commission Clerk as confidential pending resolution of FPL's 2nd request for an extension of the confidential classification.

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)(b)(c)(d) and (e), F.S., provide the following exemptions.

Subsection 366.093(3), 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. By way of an affidavit, Mr. Robert Onsgard, FPL Manager, Internal Auditing, identifies sensitive materials concerning FPL's internal audits within the staff working paper titled: "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. By way of an affidavit, Mr. Terry J. Keith, FPL Director of Cost Recovery Clauses, identifies competitively sensitive data reported within staff working papers titled: "Account Numbers on Capacity Revenue Collection" and "Billing Statements."

Mr. Keith 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. Mr. Keith points out that release of this information would place FPL at a disadvantage in the marketplace and would cause harm to the customers.

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.

By way of an affidavit, Mr. Osvaldo J. Lom, FPL Supervisor, Purchase Power Contracts, identifies sensitive purchased power information as reported within staff working papers titled: "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", "Cost of Operations #208", "Billing #208", "Cost of Operations #209", "Actual Billing #209", "Payment Coupon", "SJRPP Suspension Accrual" and "Deferred Interest".

Staff Analysis of the Request (Continued)

Mr. 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.

- 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.

By way of an affidavit, Mr. 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 titled: "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." Mr. Yupp asserts 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.

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

By way of an affidavit, Ms. Roxane R. Kennedy, FPL Director, Production Assurance and Business Services, identifies the sensitive security and contractual information reported within staff's audit working papers titled: "Security Sample Testing", and "SJRPP Security Project."

Ms. Kennedy also identifies sensitive security measures within staff's working papers titled; "SJRPP Security Project."

Staff Analysis -- Conclusion

After reading the information identified by FPL employees Onsgard, Keith, Lom, Yupp, and Kennedy, 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 are set out as exceptions to public records laws in accordance with the provisions of Sections 366.093(3)(b)(c)(d) and (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 employees 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 2nd extension of confidential classification be limited to 18 months.

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 03798-05 and 04083-05					
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	Customer-specific account information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03798-05 and 04083-05					
41-2/1	Account Numbers on Capacity Revenue Calculation	2	Col A, 1-17	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	3	Col A, 1-30	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	4	Col A, 1	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	5-8	Col A, 1-30	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	9	Col A, 1-28	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	10	Col A, 1-3	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	11-12	Col A, 1-30	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	13	Col A, 1-17	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	14	Col A, 1-7	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	15	Col A, 1-23	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	16	Col A, 1-3	Grant	Customer-specific account information
41-2/1	Account Numbers on Capacity Revenue Calculation	17	Col A, 1-2	Grant	Customer-specific account 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	Customer-specific account 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-31A; 31	Grant	Customer-specific account 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
Documents 03798-05 and 04083-05					
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
Documents 03798-05 and 04083-05					
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	6-9	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
Documents 03798-05 and 04083-05					
45-1/1	Invoice	2	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	1	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	1; 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; 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
Documents 03798-05 and 04083-05					
45-1/3	Invoice	1	Col C, 14-20; Col D, 13-20; Col E, 14-21, 24-26,30,33, 38-39,42	Grant	Sensitive contractual and competitive business information
45-1/3-1	Purchase Statement	1	4; Col A, 22-24 Col B, 15-17; Col C, 16,19-20; Col D, 15; Col E, 15,18-20; 27-29	Grant	Sensitive contractual and competitive business information
45-1/3-1	Purchase Statement	2	4 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
Documents 03798-05 and 04083-05					
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
Documents 03798-05 and 04083-05					
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
Documents 03798-05 and 04083-05					
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
Documents 03798-05 and 04083-05					
45-2/1-1	Invoice	3	Col A-B, 13,16; Col C, 13,16-17, 22,25,35	Grant	Sensitive contractual and competitive business information
45-2/1-1	Invoice	4	Col B, 27; Col C, 11,16, 19-23; Col D, 13,18,26, 33-34,38,40; Col E, 6-8	Grant	Sensitive contractual and competitive business information
45-2/1-1	Invoice	5	Col B-C, 9-12, 15-17; Col D, 9-12,15-17, 19;	Grant	Sensitive contractual and competitive business information
45-2/1-1	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

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03798-05 and 04083-05					
45-3	Invoice	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	Invoice	3	Col F-G, 8-9	Grant	Sensitive contractual and competitive business information
45-3/1	Invoice	1	Col A, 1-5	Grant	Sensitive contractual and competitive business information
✓ 45-3/1	Invoice	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

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03798-05 and 04083-05					
45-4	Invoice	2	Col B, 8-12; Col C, 23-27; Col D, 20-31; Col E, 20,23-27; Col F, 20-31	Grant	Sensitive contractual and competitive business information
45-4/1	Invoice	1	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
Documents 03799-05 and 04083-05					
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
Documents 03799-05 and 04083-05					
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

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03799-05 and 04083-05					
47-1/1-4	Payment Coupon	1	2; 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

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03799-05 and 04083-05					
47-1/1-4/2	Invoice	4	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	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

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03799-05 and 04083-05					
47-2/1-1/1	Invoice	3	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	4	4: 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
47-2/1-1/1	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, 15,18,20-21	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

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03799-05 and 04083-05					
47-2/1-4/2	Invoice	1	4; 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	4; 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

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03799-05 and 04083-05					
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	JEA 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

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03799-05 and 04083-05					
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

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information Classified Confidential
Documents 03799-05 and 04083-05					
52-1/2	Security Sample Testing	15	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	16	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	Type of Information Classified Confidential
Documents 03799-05 and 04083-05					
52-1/3-1/2	SJRPP 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	Security Sample Testing	2	Col A-C, 1-12, 14-20,22-28,32	Grant	Sensitive contractual and security information
52-1/5	Security Sample Testing	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	Security Sample Testing	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

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Office of the Commission Clerk (McLean, Cole)