

State of Florida



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COMMISSION CLERK

Public Service Commission

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-M-E-M-O-R-A-N-D-U-M-

DATE: March 29, 2010

TO: Lisa Bennett, Attorney, Office of General Counsel

FROM: Division of Auditing and Performance Analysis (Freeman, Prestwood) *F eP*

RE: Docket 100001-EI, Recommendation concerning Florida Power & Light Company's (FPL's) request for confidential classification concerning a portion of the staff audit working papers prepared during "Florida Power & Light Fuel Adjustment Audit for the Year Ended December 31, 2008", Audit Control No. 09-041-4-4, Documents Numbered 04935-09, 04936-09, and 05485-09

CORRECTED COPY

On May 12, 2009, when copies of certain portions of staff's audit working papers obtained or prepared during the "Florida Power & Light Fuel Adjustment Audit for the Year Ended December 31, 2008", were delivered to FPL at the audit exit conference, the utility requested that these materials be temporarily exempted from public access in accordance with provisions of Rule 25-22.006(3)(a)2., Florida Administrative Code (FAC).

On May 19, 2009, staff filed documents numbered 04935-09 and 04936-09 consisting of those specified portions of the staff's audit report and working papers.

On June 2, 2009, 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 a confidential classification. The utility's request included redacted copies for public inspection (Document No. 05486-09) and copies with the sensitive material highlighted (Document No. 05485-09).

Documents numbered 04935-09, 04936-09, and 05485-09, are currently held by the Office of the Commission Clerk as confidential pending resolution of FPL's request for confidential classification.

Pursuant to Section 119.07, F.S., documents submitted to this Commission are public records.

COM _____ The only exceptions to this law are specific statutory exemptions and exemptions granted by

APA _____ governmental agencies pursuant to the specific items of a statutory provision. Subsections

ECR _____ 366.093(3)(b)(c)(d) and (e), F.S., provide the following exemptions.

GCL _____

RAD _____

SSC _____

ADM _____

OPC _____

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DOCUMENT NUMBER-DATE

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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 the 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 Utility Request

Reading the filing reveals the sensitive material consists of:

- 1) Excerpts from Board of Directors’ Meeting Minutes

Alissa E. Ballot, Vice President & Corporate Secretary of FPL Group, Inc. (“FPL Group”) and Vice President & Corporate Secretary of Florida Power & Light Company (“FPL”) identifies information taken from Board of Directors’ meeting minutes and consents, which is considered by FPL to be highly sensitive, proprietary confidential business information. Staff working papers identified as sensitive by Ms. Ballot are titled: “Board of Directors Review”.

Section 366.093(3), F.S., provides that the Commission may grant a confidential classification to “proprietary confidential business information” if release of that information would harm the ratepayers or the person’s or company’s business operations. We have read the material identified by Ms. Ballot and find it is reasonable to expect release of this information would cause the harm the utility anticipates.

Staff Analysis of the Utility Request (Continued)

- 2) Material reporting internal auditing controls, reports of internal auditors or related information

By way of an affidavit, Robert Onsgard, FPL Manager, Internal Auditing, identifies sensitive material reporting internal auditing controls, reports of internal auditors and related information. Mr. Onsgard identifies materials reporting sensitive internal auditing information which is disclosed in working papers titled: "Internal Audit List" and "Internal Audit Review."

Section 366.093(3)(b), F.S., provides that the Commission may grant a confidential classification to information reporting internal auditing controls and reports of internal auditors.

- 3) Contractual data such as pricing and other terms, payment records, and vendor and supplier rates

By way of an affidavit, Gerard J. Yupp, FPL Director of Wholesale Operations in the Energy Marketing and Trading Division, points out materials which are identified as contractually sensitive in staff's working papers titled:

"Request",	"Sample Account 151",	"Invoice",
"Pricing Verification",	"Gas Closing Report",	"Purchase Statement",
"Invoice Details",	"Invoice Summary",	"Oil Closing Report",
"Fuel Pricing",	"Oil Closing",	"Publication Prices",
"Pricing Explanation",	"Pricing Verification",	"Reconciliation",
"Form 4123",	"Form 423",	"Power Deal Lambda",
"Deal Form",	"Detail",	"Vendor List",
"Agreement",	"Contract", and	"Rates."

Witness Yupp also identifies materials which are identified as both sensitive competitive business information and contractual information within staff's working papers titled:

"Gas closing Report",	"Invoice",	"Fossil Fuel",
"UPS",	"True Up",	"WACOG",
"Shipper Imbalance",	"Monthly Gas Closing",	"WACOG May 06",
"Invoice Rec.", and	"Invoice Summary."	

Lastly, Mr. Yupp identifies contractual fuel data which is identified as sensitive competitive business information within staff's working papers titled:

"Invoice True-Up",	"Form 423 Reconciliation",	"Form 423",
"Reconciliation",	"UPS" and	"Transportation."

Staff Analysis of the Utility Request (Continued)

As justification for why the material is sensitive information, Mr. Yupp asserts that the documents “contain or constitute contractual data..., the disclosure of which would impair FPL’s ability to contract for oil and gads procurement on favorable terms for the benefit of its customers in the future and would impair the competitive efforts of FPL and its vendors. Certain information in the documents and materials would also place FPL at a disadvantage when coupled with other information which is publicly available....”

Staff has read the materials identified by Mr. Yupp and agrees their release would reasonably cause the harm the FPL expects.

4) Customer-specific account information

By way of an affidavit Ms. Damaris Rodriguez, FPL Manager of Cost Recovery Claims in the Regulatory Affairs Department, identifies working papers titled: “Rate Code” as reporting sensitive information concerning customer-specific account information. Ms. Rodriguez reports that 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 determinants (kW and kWh usage), conservation savings in kWh and bills. FPL treats such information as confidential and does not disclose it, except as provided by law, to entities or persons other than the customer absent the customer’s consent....”

The Commission policy is to grant customer-specific account information a confidential classification on the basis that the information is sensitive competitive business information the release of which would harm the provider of that information. (See Commission Order No. 22851, issued April 23, 1990, in docket No. 890974-EI.)

After reading the material identified by Ms. Rodriguez, we find the information is customer-specific account information, and therefore, we recommend that the material be granted a confidential classification.

5) Competitively Sensitive Business Information Shared by FPL and Southern Co.

By way of an affidavit, Osvaldo J. Lom, FPL Supervisor of Purchased Power Contracts, identifies competitively sensitive business information contained within staff working papers titled: “UPS”, and adds “...its disclosure could make data available to the marketplace that would otherwise not be available at this level of detail.” Also, Mr. Lom indicates release of the information would place FPL at a competitive disadvantage.

Section 366.093(3)(e), F.S., provides that material may be granted a confidential classification if the material is competitively sensitive such that its release would harm the competitive business of the provider of the information. We have read the identified information and agree with FPL that release of this information would reasonably cause the harm FPL suggests; therefore, we recommend that this information be granted a confidential classification.

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 a 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
Documents Numbered 04936-09 and 05485-09					
8-1	Board of Directors Review	1-4	All	Grant	Sensitive competitive business information
9	Internal Audit List	1-4	All	Grant	Internal auditing controls and reports of internal auditors
9-1	Internal Audit Review	1-2	All	Grant	Internal auditing controls and reports of internal auditors
9-2	Internal Audit Review	2	All	Grant	Internal auditing controls and reports of internal auditors
9-3	Internal Audit Review	1	All	Grant	Internal auditing controls and reports of internal auditors
9-4	Internal Audit Review	1-2	All	Grant	Internal auditing controls and reports of internal auditors
9-5	Internal Audit Review	1	All	Grant	Internal auditing controls and reports of internal auditors
9-6	Internal Audit Review	1-4	All	Grant	Internal auditing controls and reports of internal auditors
10-2	Request	1	9-10	Grant	Internal auditing controls and reports of internal auditors
41-2/1-2	Rate Code	1	Col. 1	Grant	Sensitive competitive business information
41-2/1-3	Rate Code	1	Col. 1	Grant	Sensitive competitive business information
41-2/1-4	Rate Code	1	Col. 1	Grant	Sensitive competitive business information
41-2/1-5	Rate Code	1	Col. 1	Grant	Sensitive competitive business information
41-2/1-6	Rate Code	1	Col. 1	Grant	Sensitive competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 04936-09 and 05485-09					
41-2/1-7	Rate Code	1	Col. 1	Grant	Sensitive competitive business information
41-2/1-8	Rate Code	1	Col. 1	Grant	Sensitive competitive business information
41-2/1-9	Rate Code	1	Col. 1	Grant	Sensitive competitive business information
41-2/1-10	Rate Code	1	Col. 1	Grant	Sensitive competitive business information
41-2/1-11	Rate Code	1	Col. 1	Grant	Sensitive competitive business information
41-2/1-12	Rate Code	1	Col. 1	Grant	Sensitive competitive business information
41-2/1-13	Rate Code	1-3	1	Grant	Sensitive competitive business information
43-5	Sample Act 151	1	37,45	Grant	Sensitive contractual information
43-5/2	Invoice	1	14,17,19-29	Grant	Sensitive contractual information
43-5/2-1	Pricing Verification	1	Cols. A-B	Grant	Sensitive contractual information
43-5/2-2	Pricing Verification	1	1-9	Grant	Sensitive contractual information
43-5/3-1	Gas Closing Report	1	Cols. A-C	Grant	Sensitive contractual and competitive business information
43-5/3-1	Gas Closing Report	2	Cols. A-B	Grant	Sensitive contractual and competitive business information
43-5/3-1	Gas Closing Report	3	Cols. A-C	Grant	Sensitive contractual and competitive business information
43-5/3-1/1	Purchase Statement	1	Cols. A-D	Grant	Sensitive contractual information
43-5/3-1/1	Purchase Statement	2	Cols. A-C	Grant	Sensitive contractual information
43-5/3-1/1-1	Invoice	1-7	Cols. A-C	Grant	Sensitive contractual and competitive business information
43-5/3-1/2	Purchase Statement	1-2	Cols. A-D	Grant	Sensitive contractual information
43-5/3-1/2-1	Invoice Details	1	Cols. A-D	Grant	Sensitive contractual information
43-5/3-1/2-2	Invoice Summary	1	Cols. A-B	Grant	Sensitive contractual information
43-5/3-1/3	Purchase Statement	1	Cols. A-D	Grant	Sensitive contractual information
43-5/3-1/3-1	Invoice Details	1	Cols. A-D	Grant	Sensitive contractual information
43-5/3-1/3-2	Invoice	1-3	Cols. A-D	Grant	Sensitive contractual and competitive business information
43-5/3-1/4	Invoice	1	Cols. A-G	Grant	Sensitive contractual information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 04936-09 and 05485-09					
43-5/3-1/4-1	Invoice	1	Cols. A-F	Grant	Sensitive contractual and competitive business information
43-5/3-1/4-1	Invoice	2	Cols. A-H	Grant	Sensitive contractual and competitive business information
43-5/3-1/4-3	Invoice Summary	1-2	Cols. A-B	Grant	Sensitive contractual information
43-5/3-1/5	Invoice	1	Cols. A-G	Grant	Sensitive contractual information
43-5/3-1/5-1	Invoice Summary	1	Cols. A-B	Grant	Sensitive contractual information
43-5/4-1	Invoice	1	Cols. A-B	Grant	Sensitive contractual information
43-5/4-1	Invoice	2	Col. A	Grant	Sensitive contractual information
43-5/4-1/1	Oil Closing Report	1	Cols. A-F	Grant	Sensitive contractual information
43-5/4-1/2	Invoice	1	Cols. A-B	Grant	Sensitive contractual information
43-5/5	Invoice	1	Cols. A-B	Grant	Sensitive contractual information
43-6	Sample Acct 151	1	Cols. A-C	Grant	Sensitive contractual information
43-6/2A	Fuel Pricing	1	7-8	Grant	Sensitive contractual information
43-6/2-1	Oil Closing Report	1	1-3; Cols. A-F	Grant	Sensitive contractual information
43-6/2-1	Oil Closing Report	2	Cols. A-E	Grant	Sensitive contractual information
43-6/3-1	Invoice True-Up	1	Cols. A-B	Grant	Sensitive competitive business information
43-6/3-1	Invoice True-Up	2	Cols. A-F	Grant	Sensitive contractual information
43-6/3-1/1	Invoice	1	Cols. A-C	Grant	Sensitive contractual information
43-6/3-1/1	Invoice	2	Cols. A-E	Grant	Sensitive contractual information
43-6/6	Invoice	1	Cols. A-C	Grant	Sensitive contractual information
43-6/6	Invoice	2	All	Grant	Sensitive contractual information
43-6/6	Invoice	3-5	Cols. A-C	Grant	Sensitive contractual information
43-6/6	Invoice	6	3-4	Grant	Sensitive contractual information
43-6/6	Invoice	8	Cols. A-D	Grant	Sensitive contractual information
43-6/6	Invoice	9-10	Cols. A-C	Grant	Sensitive contractual information
43-6/8	Invoice	1	Cols. A-D	Grant	Sensitive contractual information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 04936-09 and 05485-09					
43-6/8-1	Oil Closing	1	5-8,10-11; Cols. A-F	Grant	Sensitive contractual information
43-6/8-2	Oil Closing	1-2	1-4	Grant	Sensitive contractual information
43-6/8-3	Publication Prices	1	1-2,4-8	Grant	Sensitive contractual information
43-6/8-3	Publication Prices	2	3-5	Grant	Sensitive contractual information
43-6/9	Invoice	1	Cols. A-D	Grant	Sensitive contractual information
43-6/9	Invoice	2	Cols. A-C	Grant	Sensitive contractual information
43-6/9	Invoice	3	All	Grant	Sensitive contractual information
43-6/10	Invoice	1	Cols. A-D	Grant	Sensitive contractual information
43-6/10	Invoice	2	Col. A	Grant	Sensitive contractual information
43-6/10-1	Invoice	1	Cols. A-C	Grant	Sensitive contractual information
43-6/10-1	Invoice	2	Cols. A-B	Grant	Sensitive contractual information
43-6/12-1	Oil Closing	1	1-6; Cols. A-F	Grant	Sensitive contractual information
43-6/12-1	Oil Closing	2	Cols. A-F	Grant	Sensitive contractual information
43-6/12-2	Invoice	1	Cols. A-B	Grant	Sensitive contractual information
43-6/12-2	Invoice	2	Col. A	Grant	Sensitive contractual information
43-6/13	Invoice	1	Cols. A-D	Grant	Sensitive contractual information
43-6/13	Invoice	2	Cols. A-E	Grant	Sensitive contractual information
43-6/13-1	Invoice	1	Cols. A-D	Grant	Sensitive contractual information
43-6/13-1	Invoice	2	Col. A-C	Grant	Sensitive contractual information
43-6/15	Invoice	1	Cols. A-B	Grant	Sensitive contractual information
43-6/15	Invoice	2	Cols. A-C	Grant	Sensitive contractual information
43-6/15-2	Pricing Verification	1	Cols. A-D	Grant	Sensitive contractual information
43-6/15-2	Pricing Verification	4	1-11	Grant	Sensitive contractual information
43-6/15-2	Pricing Verification	5	1-8	Grant	Sensitive contractual information
43-6/15-3	Oil Closing	1	Cols. A-F	Grant	Sensitive contractual information
43-6/16-1	Invoice	1	Cols. A-D	Grant	Sensitive contractual information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 04936-09 and 05485-09					
43-6/16-1	Invoice	2	Cols. A-C	Grant	Sensitive contractual information
43-6/16-2	Invoice	1	All	Grant	Sensitive contractual information
43-6/17-1	Invoice	1	Cols. A-D	Grant	Sensitive contractual information
43-6/17-1	Invoice	2	Cols. A-C	Grant	Sensitive contractual information
45-1	Reconciliation	1	Col. A	Grant	Sensitive contractual information
45-1/1	Form 423 Reconciliation	1	Cols. A-F	Grant	Sensitive competitive business information
45-1/1-1	Form 423	1	Cols. H-R	Grant	Sensitive competitive business information
45-1/1-3	Fossil Fuel	1	Cols. A-G	Grant	Sensitive contractual and competitive business information
45-1/1-4	Form 4123	1	Cols. H-R	Grant	Sensitive contractual information
45-2	Reconciliation	1	Col. A	Grant	Sensitive competitive business information
45-2/1	Form 423 Reconciliation	1	Cols. A-F	Grant	Sensitive competitive business information
45-2/1-1	Form 423	1	Cols. H-R	Grant	Sensitive contractual information
45-2/1-3	Fossil Fuel	1	Cols. A-G	Grant	Sensitive contractual and competitive business information
46-1/1	Power Deal Lambda	1-6	Cols. A-G	Grant	Sensitive contractual information
46-1/1-1	Deal Form	1	1-3	Grant	Sensitive contractual information
46-1/1-2	Deal Form	1	1-4	Grant	Sensitive contractual information
46-1/1-3	Deal Form	1	1-4	Grant	Sensitive contractual information
46-1/1-4	Deal Form	1	1-3	Grant	Sensitive contractual information
46-1/1-5	Deal Form	1	1-4	Grant	Sensitive contractual information
47-1/1-2	UPS	1	All	Grant	Sensitive competitive business information
47-1/1-2/1	UPS	1	All	Grant	Sensitive competitive business information
47-1/1-4/1	UPS	1	Cols. A-G	Grant	Sensitive contractual and competitive business information
47-1/1-4/1-1	UPS	1	Cols. A-F	Grant	Sensitive contractual and competitive business information
47-1/1-4/1-3	Transportation	1	Cols. A-I	Grant	Sensitive competitive business information
47-1/1-4/1-3	Transportation	2	Cols. A-E	Grant	Sensitive competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 04936-09 and 05485-09					
47-1/1-4/1-4	True-Up	1	Cols. A-I	Grant	Sensitive contractual and competitive business information
49-1/1	Detail	1	Cols. A-C	Grant	Sensitive contractual information
49-1/1	Detail	2	Cols. A-E	Grant	Sensitive contractual information
49-1/1-1	Power Deal Lambda	1	Cols. A-H	Grant	Sensitive contractual information
49-1/1-1	Power Deal Lambda	2-8	Cols. A-G	Grant	Sensitive contractual information
49-2/1	Purchase Statement	1	Cols. A-D	Grant	Sensitive contractual information
49-2/2	Invoice	2	Cols. A-D	Grant	Sensitive contractual information
49-2/3	Invoice	2	Cols. A-D	Grant	Sensitive contractual information
49-2/4	Purchase Statement	1-6	Cols. A-D	Grant	Sensitive contractual information
49-2/5	Purchase Statement	1	1; Cols. A-D	Grant	Sensitive contractual information
49-2/6	Purchase Statement	1	Cols. A-D	Grant	Sensitive contractual information
49-2/7	Purchase Statement	1	Cols. A-D	Grant	Sensitive contractual information
53-3	Invoice	2	18-19,39-40,42	Grant	Sensitive contractual information
53-3	Invoice	5	24	Grant	Sensitive contractual information
53-3	Invoice	6	14,17,21-24	Grant	Sensitive contractual information
57-1	Vendor List	1	1	Grant	Sensitive contractual information
57-2	Vendor List	1	1	Grant	Sensitive contractual information
Documents Numbered 04935-09 and 05485-09					
58-1/1	Gas closing	1	Cols. A-C	Grant	Sensitive contractual information
58-1/1-1	WACOG	1	All	Grant	Sensitive contractual and competitive business information
58-1/1-2	Invoice	1	Cols. A-C	Grant	Sensitive contractual and competitive business information
58-1/1-2	Invoice	2	1-2, Cols. A-H	Grant	Sensitive contractual and competitive business information
58-1/1-2	Invoice	3	1-2, Cols. A-C	Grant	Sensitive contractual and competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 04935-09 and 05485-09					
58-1/1-2	Invoice	4	Col. A	Grant	Sensitive contractual and competitive business information
58-1/1-2/1	Invoice summary	1	Cols. A-B	Grant	Sensitive contractual information
58-1/1-2/2	Shipper Imbalance	1	Cols. 1-C	Grant	Sensitive contractual and competitive business information
58-1/1-2/2	Shipper Imbalance	2	Cols. A-B	Grant	Sensitive contractual and competitive business information
58-1/2	Monthly Gas Closing	1	Cols. A-C	Grant	Sensitive contractual and competitive business information
58-1/2-1	WACOG -- May 06	1	All	Grant	Sensitive contractual and competitive business information
58-1/2-2	Invoice	1	Cols. A-C	Grant	Sensitive contractual and competitive business information
58-1/2-2	Invoice	2	Cols. A-J	Grant	Sensitive contractual and competitive business information
58-1/2-2	Invoice	3	Cols. A-C	Grant	Sensitive contractual and competitive business information
58-1/2-2/1	Invoice Rec.	1	Cols. A-C	Grant	Sensitive contractual and competitive business information
58-1/2-2/2	Invoice Summary	1	Cols. A-B	Grant	Sensitive contractual and competitive business information
58-1/2-2/3	Shipper Imbalance	1	Cols. A-D	Grant	Sensitive contractual and competitive business information
58-1/2-2/3	Shipper Imbalance	2	Cols. A-B	Grant	Sensitive contractual and competitive business information
58-1/2-2/3	Shipper Imbalance	3-4	Cols. A-C	Grant	Sensitive contractual and competitive business information
58-1/3	Gas closing	1	Cols. A-C	Grant	Sensitive contractual and competitive business information
58-1/3-1	WACOG	1	All	Grant	Sensitive contractual and competitive business information
58-1/3-2	Invoice	1	Cols. A-C	Grant	Sensitive contractual information
58-1/3-2/1	Invoice Summary	1	Cols. A-B	Grant	Sensitive contractual and competitive business information

Staff Work Paper Number	Description	Page(s)	Line(s)	Recommend	Type of Information
Documents Numbered 04935-09 and 05485-09					
58-1/3-2/1-1	Gas Closing	1	Cols. A-C	Grant	Sensitive contractual and competitive business information
58-1/3-2/2	Shipper Imbalance	1	Cols. A-C	Grant	Sensitive contractual and competitive business information
58-2	Agreement	2	1-2	Grant	Sensitive contractual information
58-2/1	Contract	1-4	All	Grant	Sensitive contractual information
58-2/1-1	Agreement	1	All	Grant	Sensitive contractual information
58-2/1-2	Contract	1-18	All	Grant	Sensitive contractual information
58-2/2	Rates	1	All	Grant	Sensitive contractual information
60-8/1-1	FRCC Report	1-54	All	Grant	Security measures, systems or procedures
60-8/1-2	Exhibit C	1-11	All	Grant	Security measures, systems or procedures
60-8/1-3	Exhibit D	1-12	All	Grant	Security measures, systems or procedures
60-8/1-4	Exhibit E	1-15	All	Grant	Security measures, systems or procedures
60-8/1-5	Exhibit F	1-55	All	Grant	Security measures, systems or procedures
60-8/1-6	Exhibit G	1-25	All	Grant	Security measures, systems or procedures
60-8/1-7	Exhibit H	1-13	All	Grant	Security measures, systems or procedures
60-8/1-8	Exhibit I	1-11	All	Grant	Security measures, systems or procedures
60-8/1-9	Exhibit J	1-20	All	Grant	Security measures, systems or procedures

A temporary copy of this recommendation will be held at I:05485-09 fpl 2008 fuel raf.doc for a short period.

CC: Division of Auditing and Performance Analysis (Welch)
Office of the Commission Clerk (McLean, Cole)
Office of General Counsel (Harris)