Kenneth M. Rubin
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Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 691-2512
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July 6, 2012

VIA HAND DELIVERY

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

____ claim of confidentiality
____ notice of intent
__X__ request for confidentiality
____ filed by OPC

For DN 04513-12, which is in locked storage. You must be authorized to view this DN.-CLK

Re: Docket No. 120000
Request for Confidential Classification (Smart Meter Data Request)

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") are an original and seven (7) copies of FPL's Request for Confidential Classification of Information Provided in Response to Staff's First Smart Meter Data Request. The original includes Exhibits A, B (two copies), C and D. The seven copies do not include copies of the Exhibits.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C consists of a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains two affidavits in support of FPL's Request for Confidential Classification. Also included in this filing is a compact disc containing FPL's Request for Confidential Classification and Exhibit C only, in Microsoft Word format.

Please contact me if you or your Staff have any questions regarding this filing.

Sincerely,

Kenneth M. Rubin

IDM 6
COM ____
APA ____
ECR ____
GCL ____
RAD ____
SRC ____
ADM ____
OPC ____
CLK ____

Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Staff's First Smart Meter Data Request	Docket No. 120000
	July 6, 2012

FPL's REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO STAFF'S FIRST SMART METER DATA REQUEST

Florida Power & Light Company ("FPL"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, requests confidential classification of certain information provided in response to Staff's First Smart Meter Data Request (Numbers 1, 3, 17, 18, 27, 28 and 35) (the "Confidential Discovery Responses") which was served by Staff on May 11, 2012. In support of its Request, FPL states as follows:

1. FPL served its responses to Staff's First Smart Meter Data Request (Numbers 1 through 36) on June 15, 2012. This request is being filed in order to request confidential classification of the Confidential Discovery Responses provided in response to Data Requests numbered 1, 3, 17, 18, 27, 28 and 35, consistent with Rule 25-22.006, Florida Administrative Code.

2. The following exhibits are included with, and made a part of, this Request:

a. Exhibit A consists of a copy of the Confidential Discovery Responses on which all information that FPL asserts is entitled to confidential treatment has been highlighted.

b. Exhibit B consists of an edited version of Exhibit A, on which all information that FPL asserts is entitled to confidential treatment has been redacted.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A, together with references to the specific statutory basis for the claim of confidentiality and to the affiant who supports the requested classification.

d. Exhibit D consists of the affidavits of Jeffrey Broadhead, Director of Information & Cyber Security for FPL, and Bryan Olnick, Vice President of Customer Service, Smart Grid Solutions & Meter Operations.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), F.S. This information in Exhibit A is owned or controlled by FPL, is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Further, the disclosure of said information would cause harm to FPL's customers and/or to said customers' and to FPL's business operations. Pursuant to Section 366.093, F.S., such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. As the affidavits included in Exhibit D indicate, the information provided by FPL concerns trade secrets; security measures, systems, or procedures; bids and other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms; and information related to competitive interests, the disclosure of which would impair the competitive business of the provider of the information, all of which is protected under Section 366.093(3), F.S. Further, public disclosure of the confidential documents provided by FPL with its response to Staff's First Smart meter Data Request could constitute a breach of the contractual agreements between FPL and its vendors. Specifically, the enumerated responses and responsive documents contain information regarding the security measures, systems and procedures supporting the integrity of FPL's smart meter and smart grid infrastructure; the technical specifications of certain equipment; vendor installation procedures;

and the contracted rates paid to smart meter installation contractors. The public disclosure of this information would compromise the security and integrity of the smart meters and smart grid; would compromise and disclose trade secrets; would impair the efforts of FPL to contract for goods or services on favorable terms; and would place FPL at a competitive disadvantage when coupled with other information that is publicly available.

5. Upon a finding by the Commission that the Confidential Discovery Response information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), F.S., pursuant to Section 366.093(4), F.S., such materials should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business.

WHEREFORE, FPL respectfully requests confidential classification of certain specified information provided in FPL's responses to Staff's First Smart Meter Data Request (Numbers 1, 3, 17, 18, 27, 28 and 35) as more fully described herein and on the Exhibits attached to this Request.

Respectfully submitted this 6th day of July, 2012.

Respectfully submitted,

R. Wade Litchfield, Esq.
Vice President and General Counsel
Kenneth M. Rubin, Esq.
Senior Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Ken.rubin@fpl.com
Telephone: (561) 691-2512
Facsimile: (561) 691-7135

By: _____
Kenneth M. Rubin
Fla. Bar No. 349038

EXHIBIT "A"

CONFIDENTIAL
FILED UNDER SEPARATE COVER

EXHIBIT "B"

EDITED VERSION

REDACTED

Q.
Please provide the following technical data regarding the company's smart meter installations:

a. The number, timing, and type of smart meters being employed, by customer class.
b. A copy of the manufacturer's technical specifications for each smart meter type being deployed.
c. The method of remote communication provided by each meter type (i.e., land-line vs radio frequency, one way vs. two way, etc.).

A.

a. The number, timing, and type of smart meters being employed, by customer class.

FPL smart meters are purchased from two meter manufacturers, General Electric and Landis+Gyr. For the majority of residential and small commercial customers, FPL is installing the General Electric I-210+ model. For commercial/industrial and large residential customers, FPL is installing the Landis+Gyr Focus AX and S4e models.

Current and planned installations (rounded) by customer class are:

Customer Class	# of Current Installations	# of Planned Installations
	Oct 2009 - May 2012	June 2012 - June 2013
Residential	3,100,000	1,100,000
Commercial	200,000	150,000
Industrial	2,650	1,950

b. A copy of the manufacturer's technical manuals for each smart meter type being deployed are attached, see confidential Attachment Nos. 1-3. The attachments responsive to this data request are confidential and will be filed with the Clerk with a notice of intent.

c. The method of remote communication provided by each meter type (i.e., land-line vs. radio frequency, one way vs. two way, etc.).

The method of remote communication for all our smart meters is a wireless, two way radio frequency technology, utilizing a 900 MHz band radio in each of our network components. The smart meters, access points, and relays communicate with each other to form a "mesh network."

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS
DATA REQUEST No. 1
PAGES 2-228

METER SPECIFICATIONS

Q.
Please describe the smart meter installation procedure. Include at a minimum, how long the installation takes, any wiring that may be needed, how the utility responds to unsafe conditions within the meter box, and the costs to install a meter.

A.
FPL has developed detailed procedures for the safe, accurate and efficient installation of smart meters by our contractors. These include comprehensive technician training, required technician attire and protective equipment, in-field technician support, customer notification, standardized meter exchange procedures, and processes to proactively identify and address potentially hazardous meter socket conditions. A description of each of these processes is provided below. A typical smart meter installation process ranges from 5 to 7 minutes and does not require any additional wiring.

Technician Training, Required Attire/Protective Equipment and In-Field Support

Technician Training

- Comprehensive classroom instruction with meter socket demonstrations, coupled with hands-on field training for up to four weeks. Installers must demonstrate proficiency and compliance with all safety and installation procedures throughout the training phases before being allowed to perform smart meter installations alone.
- On-going workforce stand-downs and tailboard informational sessions at all work locations to increase technician's awareness of field conditions and reinforce installation and safety processes.

Required Attire

- FPL Contractor identification badge, worn visibly and presented to customers upon request
- Honeywell logo hardhat
- Brightly colored safety vest for visibility
- Full range of Personal Protective Equipment (PPE), including:
  - Long sleeve fire resistance shirt
  - Gloving
  - Arc rated face shield (Arc rated signifies protection from electrical flashes)
  - Arc rated eye protection
  - Electrical Hazard (EH) rated footwear

In-Field Support

- Field supervisors provide real-time, 'in the field' support to technicians for any conditions they encounter. There is one Field Supervisor in the field for approximately every 10 technicians.

  - Field Supervisors also perform quality/safety audits of installers, respond to any customer issues and validate pre-existing meter socket conditions.
  - Dedicated group of FPL representatives is in radio communication with Field Supervisors to provide additional back office support.

Customer Notification Procedure

- Postcards are mailed to customers several weeks prior to scheduled smart meter installation work beginning in an area
- Prior to performing smart meter installations, technicians knock on premise doors to notify customers of the meter exchange and that they will experience a brief power interruption that typically lasts 15 to 30 seconds during the exchange. As an added precaution, technicians also advise customers to turn off all sensitive electronic equipment in the home, such as TVs and computers.
- For multi-family dwellings, the property manager is contacted and provided additional documentation advising of the meter exchange work to distribute or post for residents.

Meter Exchange Procedure

- While approaching the meter, the technician checks for overhead or underground service as well as signs of damage or potential hazards.
- Technician proceeds to the meter and conducts a visual inspection of the exterior of the meter enclosure.
- Technician verifies the existing meter type and that the meter information matches the information on their handheld device and hardcopy installation sheet.
- Technician enters the existing meter serial number and removal meter reading into their handheld mobile device.
- Technician takes a digital image of the existing meter to document the removal meter reading.
- Technician cuts the meter seal, safely removes the meter enclosure lid, and conducts a visual inspection of the meter socket looking for any potentially hazardous conditions or pre-existing damage.
- If no conditions are identified, the technician removes the existing meter and examines the back of the meter for any discoloration or evidence of damage.
- The technician conducts a visual inspection of the open meter socket and conductors looking for any potentially hazardous conditions or pre-existing damage.

- If no conditions are identified, the technician applies a lubricant on the electrical connections in the meter socket and inserts the smart meter blades into the meter socket connections. The application of the lubricant allows the insertion of the meter into the socket connections to be made easily and with minimal force.
- The technician scans the two bar codes on the smart meter to record the meter exchange in their handheld device and verifies that the meter's digital display is energized, registering and free of any error codes.
- Technician re-installs the meter enclosure lid and secures the lid with a new meter seal.
- Technician gathers up all tools, collects any debris and closes any doors or gates opened as the exit the customer's property.

Meter Socket Condition Procedure

- If at any time during the meter exchange the technician identifies a potentially hazardous condition or pre-existing meter socket damage that prevents them from safely installing the smart meter, or if damage occurs during the meter exchange, they stop the exchange and contact their Field Supervisor.
- The Field Supervisor conducts an inspection of the meter socket, verifying the condition and severity of the condition or damage.
- If the condition or damage is deemed unsafe or hazardous, the Field Supervisor will pull the existing meter, place a protective cover in the socket, hang a yellow caution tag on the meter enclosure advising of the condition and a licensed electrician on standby is dispatched to the premise for immediate repairs.
- If the condition or damage is not deemed severe, the premise is referred to a licensed electrician to perform the necessary repairs.
- Licensed electricians obtain any permitting or licensing required for performing repairs.
- Repairs are made to meet National Electrical Code (NEC) standards and in accordance with applicable local, county or city ordinances.

Meter Installation Costs for 2012	**Per Meter**
• Residential and small business meter installations	[redacted]
• Commercial/industrial and large residential meter installations - Direct Current Transformer (Instrument Transformer rated) meters - Polyphase meters	[redacted]

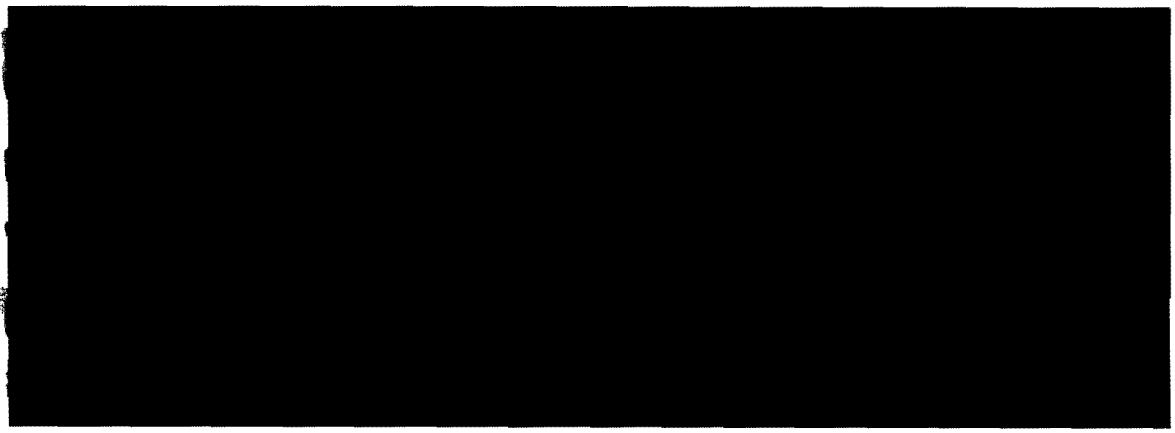
Above are negotiated contract labor rates for mass smart meter deployment project work and should not be interpreted as "opt-out" costs. These labor rates only reflect the costs for the technician to physically install a smart meter. It does not include training, project management costs, overheads, or other ancillary costs.

Q.
What cyber security measures has the company taken to ensure the security of the data transmitted by the meter?

a. What is the industry standard for security of the smart grid?

A.
It is important to emphasize that FPL smart meters do not store or transmit any personally identifying information.

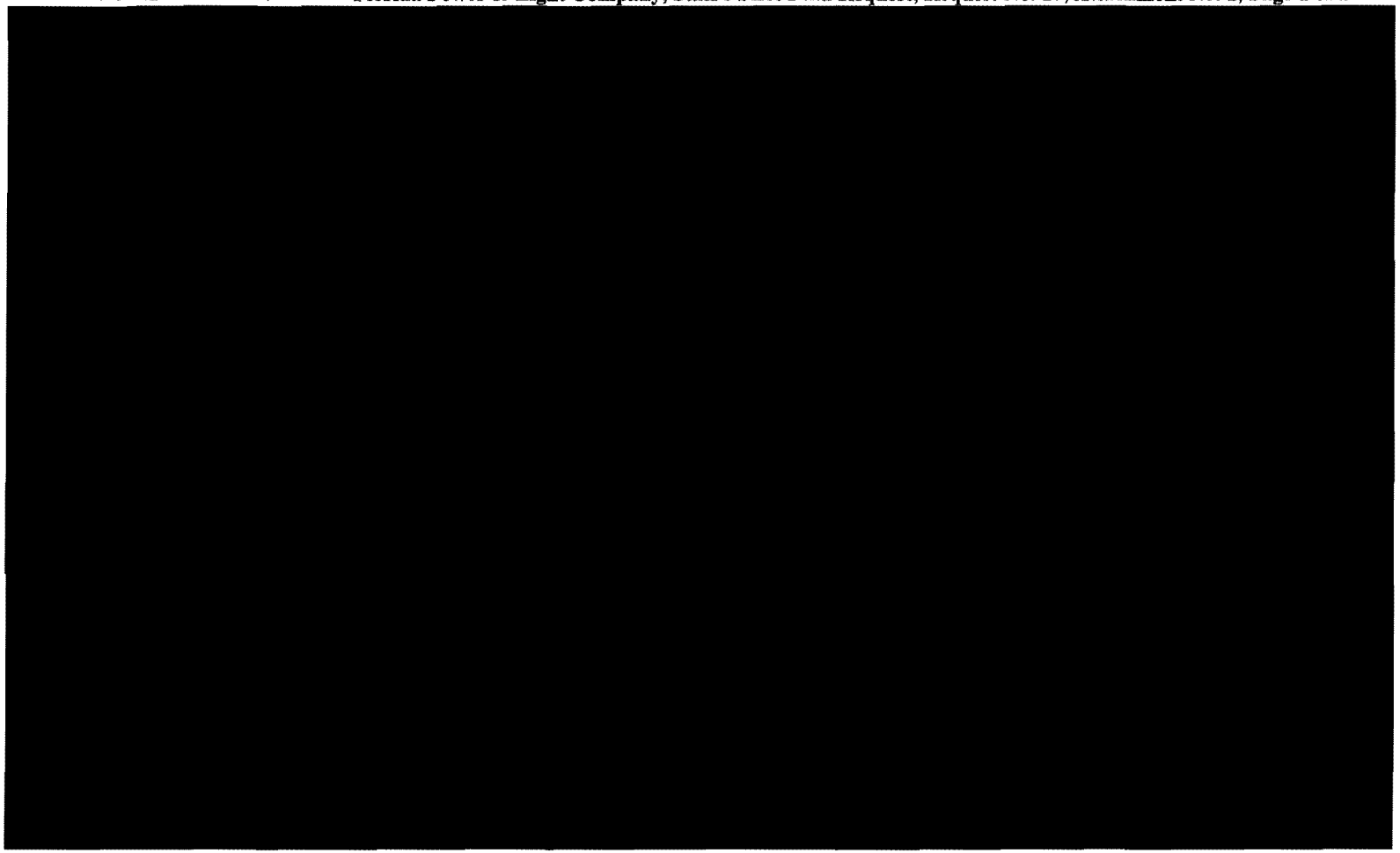
In addition, FPL has taken an industry leading position to secure the data on the network. The usage voltage data transmitted by FPL's smart meters traverses several different networks starting with the mesh network comprised of the meters, relays and access points (APs) which are all owned by FPL. Once the data reaches the AP, it is sent across public cellular networks to the FPL back office, where the back office applications (called UtilityIQ) collect and process the incoming data. Finally, the data enters the FPL corporate network, where it is stored and used for business purposes. See Attachment No. 1, a Smart Meter Cyber Security diagram.



[redacted] The data itself is subject to additional controls under Sarbanes-Oxley provisions and the systems associated with the data are subject to technical controls and routine audits required to meet Sarbanes-Oxley compliance.

a. The current industry standard for security of the smart grid is documented within the NISTIR 7628 guideline from NIST. [redacted]

The attachment responsive to this data request is confidential and will be filed with the Clerk with a notice of intent.



Q.
What security measures does the company take to ensure that customer information is delivered securely from the meter to the utility?

a. Has the company done any testing to ensure security of the transmission?

A.
It is important to emphasize that FPL smart meters do not store or transmit any personally identifying information.

The smart meter cyber security, described in detail in FPL's response to Staff's 1st DR Nos. 17 & 28, protects the data as it travels through the mesh network all the way back to the FPL back office systems. Along the way, the data is aggregated at the access points for transmission to the FPL back office systems via public cellular carriers and is protected [redacted] ttachment in FPL's response to Staff's 1st DR No. 17.

a. Yes. [redacted]

Q.
Please explain if the data transmitted by smart meters is encrypted?

A.
It is important to emphasize that FPL smart meters do not store or transmit any personally identifying information.

In addition, FPL has taken an industry leading position to secure the data on the network. [redacted]

Q.
How does the company ensure that smart meters are protected from cyber hacking?

A.
It is important to emphasize that FPL smart meters do not store or transmit any personally identifying information.

FPL's Information Security group has been involved with the design and development of the Energy Smart Florida (ESF) program since its inception and has a thorough Cyber Security Plan for this program [redacted]

[redacted]

[redacted]

The attachment responsive to this data request is confidential and will be filed with the Clerk with a notice of intent.

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS
DATA REQUEST No. 28
PAGES 2-38

CYBER SECURITY INFORMATION

Q.
Please provide the procedures for smart meter installation used by either the company or contractors.

A.
Please see Attachment No. 1 Standard Operating Procedure (SOP) for our installation contractor Honeywell. The attachment responsive to this data request is confidential and will be filed with the Clerk with a notice of intent.

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS
DATA REQUEST No. 35
PAGES 2-5

METER INSTALLATION PROCEDURES

EXHIBIT "C"

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET TITLE: Staff's First Smart Meter Data Request
DATE: July 6, 2012

Data Request No.	Description	Pages	Conf. Y/N	Line/Column	366.093(3), F.S.	Affiant
1	Meter Specifications	1 2-228	N Y	ALL	(a)	B. Olnick
3	Meter Installation Rates	1-2 3	N Y	Lines 28, 30, & 31	(d)(e)	B. Olnick
17	Cyber security Information	1 2 3	Y Y Y	Lines 15-25 Lines 1-7 & 11 ALL	(c)	J. Broadhead
18	Cyber security Information	1	Y	Lines 11-18	(c)	J. Broadhead
27	Cyber security Information	1	Y	Lines 6-12	(c)	J. Broadhead
28	Cyber security Information	1 2-38	Y Y	Lines 8-28 ALL	(c)	J. Broadhead
35	Meter Installation Procedures	1 2-5	N Y	ALL	(e)	B. Olnick

EXHIBIT "D"

AFFIDAVIT

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 120000-OT

STATE OF FLORIDA)
) **AFFIDAVIT OF JEFFREY BROADHEAD**
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared Jeffrey Broadhead who, being first duly sworn, deposes and says:

1. My name is Jeffrey Broadhead. I am currently employed by Florida Power & Light Company ("FPL") as Director, Information & Cyber Security. I have personal knowledge of the matters stated in this affidavit.

2. With respect to Exhibit C, I have reviewed the documents and information for which I am listed as Affiant that are included in Exhibit A to FPL's Request for Confidential Classification of Information Provided in Response to Staff's First Smart Meter Data Request. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, contain or constitute security measures, systems or procedures, and trade secrets. Specifically, the information contains functionalities, configurations and technologies deployed by FPL to protect the security, integrity and privacy associated with its smart grid infrastructure. The disclosure of this information would cause harm to FPL and its customers and to the Company's business operations. To the best of my knowledge, FPL intends to and has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.

Jeffrey Broadhead

SWORN TO AND SUBSCRIBED before me this 3rd day of July 2012, by Jeffrey Broadhead, who is personally known to me or who has produced personally known (type of identification) as identification and who did take an oath.

Morgan A Sabato
Notary Public, State of Florida

My Commission Expires:

MORGAN A. SABATO
Notary Public - State of Florida
My Comm. Expires Oct 23, 2015
Commission # EE 140489

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 120000-OT

STATE OF FLORIDA)
)
COUNTY OF MIAMI-DADE)

AFFIDAVIT OF BRYAN OLNICK

BEFORE ME, the undersigned authority, personally appeared Bryan Olnick who, being first duly sworn, deposes and says:

1. My name is Bryan Olnick. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Customer Service Smart Grid Solutions and Meter operations. I have personal knowledge of the matters stated in this affidavit.

2. With respect to Exhibit C, I have reviewed the documents and information for which I am listed as Affiant that are included in Exhibit A to FPL's Request for Confidential Classification of Information Provided in Response to Staff's First Smart Meter Data Request. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, contain or constitute trade secrets; information concerning bids or other contractual data; and information relating to competitive interests. Specifically, the information includes technical meter specifications the disclosure of which would harm FPL and its customers and the Company's business operations. Such documents or materials also contain or constitute contractual information and information relating to competitive interests. Specifically, the information includes contracted rates paid to smart meter installation contractors, as well as vendor installation operating procedures. The disclosure of this information would impair FPL's efforts to contract for goods and services on favorable terms, and would harm the competitive interests of FPL. To the best of my knowledge, FPL intends to and has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.

SONIA RYAN-BROWN
Notary Public - State of Florida
My Comm. Expires Jul 20, 2013
Commission # DD 908904

Bryan Olnick

SWORN TO AND SUBSCRIBED before me this 3 day of July 2012, by Bryan Olnick, who is personally known to me or who has produced FL Drivers License (type of identification) as identification and who did take an oath.

Notary Public, State of Florida

My Commission Expires: 7/20/13