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Florida Power & Light Company
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June 26, 2013

VIA HAND DELIVERY

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

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COMMISSION
CLERK

Re: Docket No. 130009-EI; Nuclear Power Plant Cost Recovery Clause

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is a Request for Confidential Classification of Audit 13-010-4-2 Work Papers. Seven copies of FPL's request, including Exhibits C and D, are included. Also included are one copy of Exhibit A and two copies of Exhibit B.

Exhibit A consists of the confidential documents, and all 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 FPL's justification table supporting its 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 in Microsoft Word format.

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

Sincerely,

Jessica Cano
Jessica A. Cano

Enclosures
cc: Parties of Record (w/out enc.)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

Docket No. 130009-EI
Filed: June 26, 2013

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
AUDIT 13-010-4-2 WORK PAPERS**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 13-010-4-2 ("the Audit") and reflected in Staff's work papers. In support of its request, FPL states as follows:

1. During the Audit, Staff was provided with various confidential documents. By letter dated June 5, 2013, Staff indicated its intent to retain certain audit work papers. Pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the work papers. Accordingly, FPL is filing this Request for Confidential Classification to maintain continued confidential handling of the confidential work papers.

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

a. Exhibit A includes a copy the confidential documents, in which all information that is entitled to confidential treatment under Florida law has been highlighted.

b. Exhibit B consists of a copy of the confidential documents, in which all information that is entitled to confidential treatment has been redacted.

c. Exhibit C is a table containing the specific line, column and page references to the confidential information, and references to the specific statutory basis or

bases for the claim of confidentiality and to the affidavit in support of the requested confidential classification.

d. Exhibit D includes the affidavits of Kate Stengle and Christie Gidos in support of FPL's request.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private in that the disclosure of the information would cause harm to customers or FPL's business operations, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and it 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, some of information in the Audit work papers is proprietary, confidential business information. Certain information contained in the work papers is information related to reports of internal auditors. This information is protected by Section 366.093(3)(b), Florida Statutes. The work papers also contain information related to bids or contractual data, such as pricing or other terms, the public disclosure of which would violate nondisclosure provisions of FPL's contracts with certain vendors and impair FPL's ability to contract for goods or services on favorable terms in the future. Such information is protected from public disclosure by Section 366.093(3)(d), Florida Statutes. The work papers also include competitively sensitive information which, if disclosed, could impair the competitive interests of the provider of the information. Such information is protected from

public disclosure by Section 366.093(3)(e), Florida Statutes. Additionally, a few documents include competitively sensitive information related to certain employees' compensation. Public disclosure of compensation information would enable competing employers to meet or beat the compensation currently offered, resulting in the loss of talented employees, or conversely, the need to increase the level of compensation already paid in order to retain these employees and attract new talent. The quality of service and the cost of service implications would be detrimental to FPL and its customers. Such information is also protected by Section 366.093(3)(e), Florida Statutes. Lastly, included on these documents are employee social security numbers. This employee information is unrelated to compensation, duties, qualifications, or responsibilities and is therefore protected from public disclosure pursuant to Section 366.093(3)(f), Florida Statutes.

5. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

Jessica A. Cano
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5226
Facsimile: (561) 691-7135

By: Jessica Cano
Jessica A. Cano
Fla. Bar No. 0037372

**CERTIFICATE OF SERVICE
DOCKET NO. 130009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification of Audit 13-010-4-2 Work Papers* was served via hand delivery** or U.S. mail this 26th day of June, 2013 to the following:

Michael Lawson, Esq.
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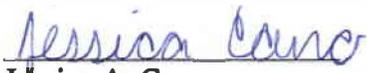
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By: 
Jessica A. Cano
Fla. Bar No. 0037372

* Exhibits to this Request are not included with the service copies, but copies of Exhibits B, C, and D are available upon request.

Exhibit C
Company: Florida Power and Light Company
Title: List of Confidential Workpapers Audit Control No. 13-010-4-2
Docket No. 130009-EI

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
Index	Confidentiality Index	2	N			
9	List of internal audits	5	Y	All	(b)	Kate Stengle
9-1	Internal audit notes	3	Y	All	(b)	Kate Stengle
9-2	Internal audit notes	3	Y	Page 1 All Page 2 No Page 3 Lines 1-4	(b)	Kate Stengle
9-3	Internal audit notes	2	Y	All	(b)	Kate Stengle
9-3/1	Internal audit response	1	Y	Page 1 Lines 1-3	(b)	Kate Stengle
10 page 31	Request Number 31	1	Y	Page 1 Lines 1-3	(b)	Kate Stengle
12 page 2	Reconciliation to T-6	1	N			
12-1	Reconciliation to T-6	1	N			
12-1/1	Project control Worksheet	1	Y	Page 1 Line 1	(d) (e)	Christie Gidos
12-1/2	Project control Worksheet	1	Y	Page 1 Line 1	(d) (e)	Christie Gidos
12-1/3	Project control Worksheet	1	N			
12-2	CWIP Balances	1	N			
12-2/1	CWIP Balances	26	N			
12-2/1-1	CWIP Balances	1	N			
12-2/1-1/1	CWIP Balances	1	N			
12-2/1-1/2	CWIP Balances	1	N			
12-2/1-1/3	CWIP Balances	1	N			
12-2/1-1/4	CWIP Balances	1	N			
12-2/2	CWIP Balances	20	N			
25-1	PO's over \$250K	1	Y	Page 1 Column A	(d) (e)	Christie Gidos
25-1/1	PO's over \$250K	6	Y	Page 1 Lines 1-14 Page 2 Lines 1-5 Page 3 Lines 1-8	(d) (e)	Christie Gidos

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				Page 4 Lines 1-12 Page 5 Lines 1-16 Page 6 Lines 1-3		
43-1	Sample	14	Y	Page 1-7 No Page 8 Lines 1-5 Page 9-10 No Page 11 Lines 1-7 Page 12 Lines 1-8 Page 13 Lines 1-7 Page 14 Lines 1-4	(d) (e) (f)	Christie Gidos
43-1/2	Sample questions	1	Y	Page 1 Lines 1-9	(d) (e)	Christie Gidos
43-1/2-1	Sample questions	1	Y	Page 1 Lines 1	(d) (e)	Christie Gidos
43-1/2-1/1	Sample questions	2	Y	Page 1 Lines 1-9 Page 2 Lines 1-24	(d) (e) (f)	Christie Gidos
43-2	Sample	10	Y	Page 1-5 Column A Page 6 Column A and Column B Lines 1-2 Page 7 Column A and Column B Lines 1-3 Page 8 Column A Page 9 Column	(d) (e)	Christie Gidos

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				A and Column B Lines 1-5 and Line 6 Page 10 Column A and Column B Lines 1-3		
43-2/1	Sample questions	2	Y	Page 1 Columns A and B and Line 1 Page 2 Columns A and B and C	(e)	Christie Gidos
43-2/2	Sample	2	Y	Page 1 Column A Page 2 Column A Line 1 and Column B	(e)	Christie Gidos
43-2/3	Sample	2	N			
43-2/4	Sample	6	N			
43-2/5	Sample	2	Y	Page 1 Column A Page 2 No	(e)	Christie Gidos
43-3	Sample	14	Y	Pages 1-7 No Page 8 Lines 1-21 Page 9 Lines 1-15 Page 10 Lines 1-13 Page 11 Lines 1-11 Page 12 Lines 1-16 Page 13 Lines 1-13 Page 14 Lines 1-4	(d) (e)	Christie Gidos
43-3/1	Sample questions	4	Y	Page 1 Lines 1-	(d) (e)	Christie

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				2 Page 2 Lines 1-3 Page 3 Lines 1-3 Page 4 No		Gidos
43-3/1-2	Sample questions	1	Y	Page 1 Line 1	(d) (e)	Christie Gidos
43-3/1-2/1	Sample questions	1	Y	Page 1 Column A	(d) (e)	Christie Gidos
43-3/2	Sample questions	1	Y	Page 1 Column A	(e)	Christie Gidos
43-3/2-1	Sample questions	1	Y	Page 1 Column A	(e)	Christie Gidos
43-3/2-2	Sample questions	1	Y	Page 1 Lines 1-3 and Columns A and B and C and D	(e)	Christie Gidos
43-4	Sample	2	Y	Page 1 No Page 2 Column A	(d) (e)	Christie Gidos
46-1	Payroll	3	Y	Page 1 No Page 2 Lines 1-7 Page 3 Lines 1-7	(e)	Christie Gidos
46-1/1	Payroll	6	Y	Pages 1-4 Column A Page 5 Column A and Column B Lines 1-4 Page 6 Column A and Column B Lines 1-2	(d) (e)	Christie Gidos
46-1/1-1	Payroll	1	Y	Page 1 Lines 1-2	(f)	Christie Gidos
46-1/2	Payroll	8	Y	Pages 1-8 Column A	(d) (e)	Christie Gidos
46-2/2	Payroll	1	N			
49-1	Affiliate Charges	1	Y	Page 1 Line 1	(e)	Christie Gidos
49-2	Affiliate Charges	8	Y	Page 1 Line 1	(d) (e)	Christie

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				Page 2 Lines 1-2 Page 3 No Page 4 Lines 1-2 Page 5 No Page 6 Lines 1-2 Page 7 No Page 8 Lines 1-2		Gidos
49-3	Affiliate Charges	1	Y	Page 1 Lines 1-16	(d) (e)	Christie Gidos
49-3/1	Affiliate Charges	1	Y	Page 1 Columns A and B and C and D	(d) (e)	Christie Gidos
49-3/2	Affiliate Charges	1	Y	Page 1 Lines 1-5	(d) (e)	Christie Gidos
49-3/2-1	Affiliate Charges	1	N			
49-3/3	Affiliate Charges	1	Y	Page 1 Lines 1-6	(d) (e)	Christie Gidos
49-5	Affiliate Charges	1	N			
49-5/1	Affiliate Charges	8	Y	Page 1 Lines 1-2 Page 2 Line 1 Page 3-4 Lines 1-2 Pages 5 No Page 6 Lines 1-3 Page 7 No Page 8 Lines 1-6	(d) (e)	Christie Gidos
49-5/2	Affiliate Charges	1	Y	Page 1 Lines 1-2	(d) (e)	Christie Gidos
49-5/2-1	Affiliate Charges	1	N			
49-5/2-2	Affiliate Charges	1	N			

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
50-1	Jurisdictional factor	1	N			
50-2	Jurisdictional factor	1	N			
50-3	Jurisdictional factor	1	N			

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost)
Recovery Clause)

DOCKET NO. 130009-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT OF KATE STENGLE

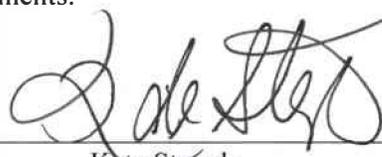
BEFORE ME, the undersigned authority, personally appeared Kate Stengle who, being first duly sworn, deposes and says:

1. My name is Kate Stengle. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Internal Auditing. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in FPL's Request for Confidential Classification of information contained in staff's work papers for Audit Control No. 13-010-4-2, for which I am identified on Exhibit C as the affiant. The documents or materials that I have reviewed contain information related to reports of internal auditors. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may affect the effectiveness of the Internal Auditing department itself. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

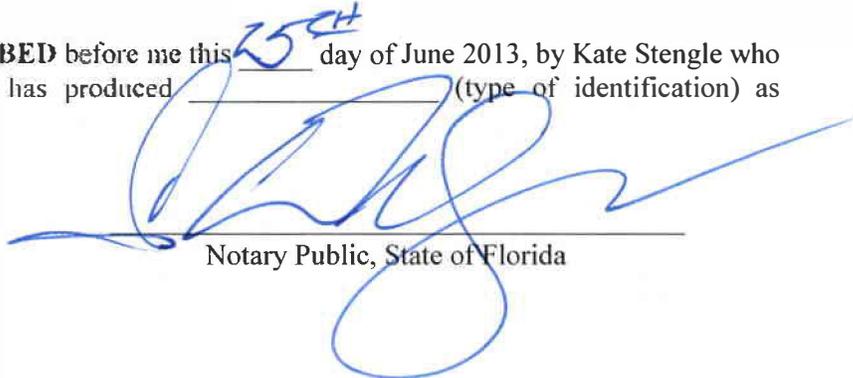
3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL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

4. Affiant says nothing further.



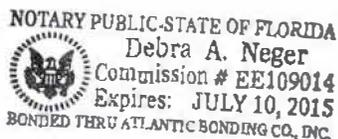
Kate Stengle

SWORN TO AND SUBSCRIBED before me this 25th day of June 2013, by Kate Stengle who is personally known to me or who has produced _____ (type of identification) as identification and who did take an oath.



Notary Public, State of Florida

My Commission Expires:



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost)
Recovery Clause)

DOCKET NO. 130009-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT OF CHRISTIE GIDOS

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

1. My name is Christie Gidos. I am currently employed by Florida Power & Light Company ("FPL") as Senior Financial Analyst in the Project Controls group for Turkey Point 6 & 7. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in FPL's Request for Confidential Classification of information contained in staff's work papers for Audit Control No. 13-010-4-2, for which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed contain proprietary confidential business information, including contractual data and competitively sensitive data. Disclosure of this information would violate FPL's contracts with its vendors, work to the detriment of FPL's competitive interests, impair the competitive interests of its vendors and/or impair FPL's efforts to enter into contracts on commercially favorable terms. Additionally, certain of these materials contain competitively sensitive information related to certain employees' compensation. Public disclosure of compensation information for particular positions would enable competing employers to meet or beat the compensation offered by FPL, resulting in the loss of talented employees, or conversely, the need to increase the level of compensation already paid in order to retain these employees and attract new talent. The quality of service and the cost of service implications would be detrimental to FPL and its customers. Finally, these documents include employee social security numbers, which FPL has an obligation to maintain as confidential. To the best of my knowledge, FPL 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.

Christie Gidos
Christie Gidos

SWORN TO AND SUBSCRIBED before me this 25 day of June 2013, by Christie Gidos, who is personally known to me or who has produced _____ (type of identification) as identification and who did take an oath.

[Signature]
Notary Public, State of Florida

My Commission Expires:

