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Senior Attorney
Florida Power & Light Company
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November 23, 2015

VIA ELECTRONIC FILING

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

Re: Docket No. 150009-EI; Nuclear Cost Recovery Clause

Dear Ms. Stauffer:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is a First Request for Extension of Confidential Classification of Audit 08-087-4-1 Work Papers, including Revisions to Exhibit A (not confidential), Revisions to Exhibit B, Revised Exhibit C, and Revised Exhibit D.

Please contact me if there are any questions regarding this filing.

Sincerely,

s/ Jessica A. Cano

Jessica A. Cano
Fla. Bar No. 0037372

Enclosures
cc: Counsel for Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

Docket No. 150009-EI
Filed: November 23, 2015

**FLORIDA POWER & LIGHT COMPANY'S
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION
OF AUDIT 08-087-4-1 WORK PAPERS**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests continued confidential classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 08-087-4-1 ("the Audit") and reflected in Staff's work papers. In support of its request, FPL states as follows:

1. On August 20, 2008, FPL filed its Request for Confidential Classification of the Audit work papers. No order was issued on that request. By letter dated March 18, 2010, Staff requested that FPL review the confidential documents and determine if any portions could be declassified. Accordingly, on April 22, 2010, FPL filed a revised request declassifying a substantial amount of the information (*see* Confidential Document 03169-10). By Order No. PSC-14-0251-CFO-EI, issued May 22, 2014, the Commission granted FPL's revised request. The period of confidential treatment granted by Order No. PSC-14-0251-CFO-EI will soon expire. FPL has determined that most of the information that was the subject of Order No. PSC-14-0251-CFO-EI warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3), Florida Statutes, while some pages are no longer confidential. Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification. Revised Exhibits A and B from FPL's April 22, 2010 filing are incorporated herein by reference. Included herewith are further Revisions to Exhibits A and B, Revised Exhibit C, and Revised Exhibit D.

2. The Revisions to Exhibits A and B only include the pages from FPL's April 22, 2010 Revised Exhibits A and B that no longer contain confidential information. Revised 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 continued confidential classification. Changes to the material classified as confidential have been noted in bold font. Revised Exhibit D includes the affidavits of Christie Gidos and Antonio Maceo in support of FPL's request.

3. The information that was granted confidential treatment by Order No. PSC-14-0251-CFO-EI continues to be 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 Revised Exhibit D indicate, the information included in FPL's April 22, 2010 Revised Exhibit A (except for the revised pages attached hereto) continues to be proprietary, confidential business information. Certain information contained in the Audit 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, some of 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.

5. Nothing has changed since the issuance of Order No. PSC-14-0251-CFO-EI to render the confidential information (i.e., information that continues to be designated as confidential) stale or public, such that continued confidential treatment would not be appropriate. Moreover, this information will remain confidential for a period longer than the 18 months typically provided for confidential treatment, and it is anticipated that Staff will retain these documents for more than 18 months. Accordingly, FPL requests that confidential treatment be extended for a period of not less than five years. The Commission has previously granted similar requests for extended periods of confidential treatment. *See, e.g.*, Docket No. 140009-EI, Order No. PSC-14-0649-CFO-EI, p. 2 (issued Nov. 4, 2014).

6. Upon a finding by the Commission that the information referenced in Revised Exhibit C continues to be proprietary confidential business information, the information should not be declassified for a period of at least an additional five years 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 supported by the materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

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

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

**CERTIFICATE OF SERVICE
DOCKET NO. 150009-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing First Request for Extension of Confidential Classification of Audit 08-087-4-1 Work Papers* was served by electronic mail this 23rd day of November, 2015 to the following:

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*Attorney for Fla. Industrial Power Users
Group*

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

*Exhibits are not included with the service copies, but Revised Exhibits C and D are available upon request.

REVISIONS TO EXHIBIT A

(NOT CONFIDENTIAL)

FPL NUCLEAR
Turkey Point 6 & 7
Dckt 080009-EI Audit 08-087-4-1
TYR 12/31/07
Title: Nuclear Contracts

5/21/08

JAP
7/23/08

Florida Power & Light Company
Docket No. 080001-EI
FESC Nuc Control Review Dr #3
Question No. 11
Page 1 of 1

Q.

- a) Please provide a description of the status of service and/or materials contracts for Turkey Point Units 6 and 7. Please include descriptions of any negotiations that have not yet resulted in bids or contracts.
- b) Please provide copies of all executed service and/or materials contracts and addendums for Turkey Point Units 6 and 7.
- c) Please provide copies of all sole-source or single-source justification explanations for any applicable Turkey Point Units 6 and 7 contracts.

A.

a)

- 1 1. Contract for Engineering and Procurement of Two (2) AP-1000 Standard Nuclear Power
2 Generation Systems between FPL and the consortium of Westinghouse Electric Company
3 and Shaw Group. This negotiation is in an early stage and is focused on development of
4 scope of work, pricing, contract terms and conditions, and schedule. Contract is expected to
5 be executed March 2009. No estimate of the contract value is yet available. 44-4
- 6 2. Contract for Preliminary Engineering for Site Specific Systems and Structures and for
7 Project Construction Planning for Turkey Point Units 6 & 7. This negotiation is in an early
8 stage and is focused on development of scope of work, pricing, contract terms and conditions,
9 and schedule. Contract execution is planned for second quarter 2008. No estimate of the
10 contract value is yet available.
- 11 3. Contract for Conceptual Engineering of Cooling Water Supply and Disposal for Turkey
12 Point Units 6 & 7. This negotiation has resulted in Requests for Proposals and these are
13 expected to be in evaluation by the end of April, 2008. Contract expected to be executed
14 mid-2008. No estimate of the contract value is yet available.
- 4. Contract Change Order to the Bechtel Power Corporation COLA Preparation Contract for
Site Certification Application and Federal (non-NRC), State and Local Permits. This
negotiation has resulted in development of a preliminary scope of work, preliminary cost
estimates from single-sourced subcontractors to Bechtel, and initial contractor and
subcontractor meetings to establish a framework for contract execution and performance. No
estimate of the contract change order value has been finalized. 44-2

REVISIONS TO EXHIBIT B

FPL NUCLEAR
Turkey Point 6 & 7
Dckt 080009-EI Audit 08-087-4-1
TYR 12/31/07
Title: Nuclear Contracts

5/21/08

JAP
7/23/08

Florida Power & Light Company
Docket No. 080001-EI
FPC Nuc Control Review Dr #3
Question No. 11
Page 1 of 1

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- c) Please provide copies of all sole-source or single-source justification explanations for any applicable Turkey Point Units 6 and 7 contracts.

A.

a)

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5 be executed March 2009. No estimate of the contract value is yet available. 44-4
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8 stage and is focused on development of scope of work, pricing, contract terms and conditions,
9 and schedule. Contract execution is planned for second quarter 2008. No estimate of the
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subcontractor meetings to establish a framework for contract execution and performance. No
estimate of the contract-change order value has been finalized. 44-2

Revised Exhibit C

Company: Florida Power and Light Company

Title: Revised List of Confidential Work Papers, Audit Control No: 08-087-4-1

Docket No.: 080009-EI

***Revised items are noted in bold**

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
1	Report	2	Y Y	Page 1: Lines 5-9, 11-12 Page 2: Column 2	(e)	Christie Gidos
1 Annotated	Report	2	Y Y	Page 1: Lines 5-8, 10-11 Page 2: Column 2	(e)	Christie Gidos
9	Internal Report Uprate	20	Y	All	(b)	Antonio Maceo
43-1	Sample	6	Y Y Y	Page 1: Column 14 Lines 11-16, 18-20, 23-26; Column 24 Lines 3-7, 9-11, 13, 15, 18-19, 23-24 Page 2: Column 14 Lines 27-39, 42, 44-47, 49, 51-58, 60, 62-64; Column 24 Lines 27, 30, 35, 38, 41-42, 45-46, 53-55, 58, 60, 62-64 Page 3: Column 14 Lines 65, 67, 69, 71-74, 76, 96-97, 104-106; Column 18 Lines 70, 95, 99-100; Column 24 Lines 70-73, 86-87, 90, 92-96, 99-100, 104 Page 4: Column 14 Lines 107-	(d), (e)	Christie Gidos

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
			N	109, 112-115, 118, 125-126; Column 24 Lines 108, 122 Page 5		
			N	Page 6		
43-1/1	Legal	5	Y	Page 1: Lines 1-4	(d), (e)	Christie Gidos
			N	Page 2		
			Y	Page 3: Lines 1-3, 6-7		
			Y	Page 4: Line 6		
			Y	Page 5: Line 8		
43-1/2	PR Costs	59	Y	Page 1: Section 1	(d), (e)	Christie Gidos
			Y	Pages 2-22		
			N	Pages 23-59		
43-1/3	Legal	2	Y	All	(d), (e)	Christie Gidos
43-1/4	Legal	5	Y	Page 1: Line 1	(d), (e)	Christie Gidos
			N	Pages 2-5		
43-1/5	Pension and Welfare	1	N	N/A	N/A	N/A
43-1/7	Purchase Order	8	Y	Page 1: Section 1	(d), (e)	Christie Gidos
			Y	Pages 2-8		
43-1/9	Signing Bonus and Relocation	1	Y	Page 1: Columns 2 & 4 and Lines 1 & 3	(e)	Christie Gidos
44	Contract Summary	2	N	Page 1: Lines 5, 9 & 14	N/A	
			N	Page 2		
44-1	NuStart	68	Y	Pages 1-56	(d), (e)	Christie Gidos
			Y	Page 57 Lines 1-13		

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
			Y	Page 58 Lines 1-13		
			Y	Page 59 Lines 1-13		
			Y	Page 60 Lines 1-13		
			Y	Page 61 Lines 1-7		
			Y	Page 62 Lines 1-9		
			Y	Page 63 Lines 1-8		
			Y	Page 64 Lines 1-8		
			Y	Page 65 Lines 1-4		
			Y	Pages 66-68		
44-2	Bechtel	40	Y	Page 1: Section 1	(d)	Christie Gidos
			N	Page 2		
			Y	Pages 3-40		
44-2/1	Bechtel Scope	139	Y	All	(d)	Christie Gidos
44-2/2	Bechtel Exhibit B	95	Y	All	(d)	Christie Gidos
44-2/3	Bechtel Exhibit E	46	Y	All	(d)	Christie Gidos
44-3	Comensura	112	Y	All	(d)	Christie Gidos
44-4	Westinghouse Contract	13	Y	Page 1: Section 1	(d)	Christie Gidos
			Y	Pages 2-13		
44-4/1	Westinghouse Contract	46	Y	Pages 1-45	(d)	Christie Gidos
			N	Page 46		
44-4/1-1	Westinghouse Contract	15	Y	Pages 1-14	(d)	Christie Gidos
			N	Page 15		
44-4/1-2	Westinghouse Contract A	118	Y	All	(d)	Christie Gidos

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
45	Schedule	46	Y	All	(e)	Christie Gidos
47	NuStart	1	Y	Page 1: Line 1	(e)	Christie Gidos
47-1	NuStart FS	12	Y	All	(d), (e)	Christie Gidos
47-2	NuStart Federal Award	9	Y	All	(d), (e)	Christie Gidos
47-3	NuStart Expense	1	Y	All	(e)	Christie Gidos
49	Affiliate	4	N Y N	Page 1 Page 2: Column 1 Lines 1-5 Pages 3-4	(e)	Christie Gidos
49-2	Affiliate OH	8	Y	All	(e)	Christie Gidos

REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

DOCKET NO. 150009-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 NextEra Energy Resources as Senior Project Controls and Scheduling Specialist. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the documents that are the subject of FPL's First Request for Extension of Confidential Classification of Audit 08-087-4-1 Work Papers, for which I am identified on Revised 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 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, the documents contain information related to NextEra Energy Inc.'s cost structure which, if publicly disclosed, could harm NextEra Energy Inc.'s competitive interests. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. No significant changes have occurred since the issuance of Order No. PSC-14-0251-CFO-EI to render the information identified in Revised Exhibit C stale or public such that continued confidential treatment would not be appropriate. Additionally, this information will continue to be confidential for more than the next 18 months. Accordingly, this information should continue to be maintained as confidential for an additional period of not less than five years. These materials 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.

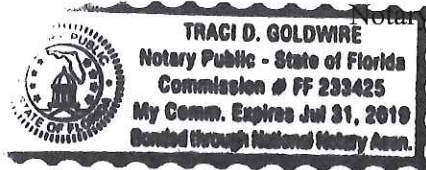
4. Affiant says nothing further.

Christie Gidos
Christie Gidos

SWORN TO AND SUBSCRIBED before me this 12th day of November 2015, by Christie Gidos, who is personally known to me or who has produced personally known (type of identification) as identification and who did take an oath.

Traci D. Goldwire
Notary Public, State of Florida

My Commission Expires:



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

DOCKET NO. 150009-EI

STATE OF FLORIDA)
MIAMI-DADE COUNTY)

AFFIDAVIT OF ANTONIO MACEO

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

1. My name is Antonio Maceo. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Auditing. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the documents that are the subject of FPL's First Request for Extension of Confidential Classification of Audit 08-087-4-1 Work Papers, for which I am identified on Revised Exhibit C as the affiant. The documents 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 scope, 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. No significant changes have occurred since the issuance of Order No. PSC-14-0251-CFO-EI to render the information identified in Revised Exhibit C stale or public such that continued confidential treatment would not be appropriate. Additionally, this information will continue to be confidential for more than the next 18 months. Accordingly, this information should continue to be maintained as confidential for an additional period of not less than five years. These materials 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.

Antonio Maceo

SWORN TO AND SUBSCRIBED before me this 13 day of November 2015, by Antonio Maceo 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:

