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December 9, 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 11-024-4-1 Work Papers, including Revised Exhibit C and Revised Exhibit D.

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

Sincerely,

<u>s/ Jessica A</u>. 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: December 9, 2015

### FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF AUDIT 11-024-4-1 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. 11-024-4-1 ("the Audit") and reflected in Staff's work papers. In support of its request, FPL states as follows:

1. On June 13, 2011, in Docket No. 110009-EI, FPL filed a Request for Confidential Classification of the Audit work papers (Confidential Document No. 04051-11). By Order No. PSC-14-0292-CFO-EI, issued June 9, 2014, the Commission granted FPL's request. The period of confidential treatment granted by Order No. PSC-14-0292-CFO-EI will soon expire. FPL has determined that all the information that was the subject of Order No. PSC-14-0292-CFO-EI warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3), Florida Statutes. Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification. Exhibits A and B from FPL's June 13, 2011 filing are incorporated herein by reference. Included herewith are Revised Exhibit C and Revised Exhibit D.

2. 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. Revised Exhibit D includes the affidavits of Brenda Thompson and Antonio Maceo in support of FPL's request.

3. The information that was granted confidential treatment by Order No. PSC-14-0292-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 Exhibit A 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. For example, copies of contracts and contractor billing rates are included in these materials. Such information is protected from public disclosure by Section 366.093(3)(d), Florida Statutes. This contractual information, as well as information related to FPL's tax returns and other information belonging to NextEra Energy Resources, is also competitively

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sensitive. If disclosed, this information could impair the competitive interests of the provider of the information. Such information is protected 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. Lastly, included on these documents is 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. Nothing has changed since the issuance of Order No. PSC-14-0292-CFO-EI to render the confidential information 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

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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: <u>s/ Jessica A. Cano</u> 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 11-024-4-1 Work Papers\* was served by electronic mail this 9<sup>th</sup> day of December, 2015 to the following:

Martha F. Barrera, Esq. Kyesha Mapp, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850 mbarrera@psc.state.fl.us kmapp@psc.state.fl.us

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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.

# Revised Exhibit C Company: Florida Power and Light Company Title: List of Confidential Audit #11-024-4-1 Work Papers Docket No. 110009-EI

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
Index	Confidentiality Index	3	N			
2-1/5	Contracts Over \$250,000	1	Y	Page 1 Columns 6-9	(d), (e)	Brenda Thompson
2-1/5-1	Contracts Over 1 Million	6	Y	Pages 1-6 Line 8	(d), (e)	Brenda Thompson
9-1	List of 2010 Audits	2	Y	ALL	(b)	Antonio Maceo
9-1/1	Audit Report Review	2	Y	ALL	(b)	Antonio Maceo
9-2	List of 2009 Audits	4	Y	ALL	(b)	Antonio Maceo
12-1	Recoverable Charges by Source Code	1	N			
12-2	Monthly Charges by Source Code	1	N			
12-2/1	Percentage Tested	1	N			
19-1	New Nuke CWIP to Ledger Additions Rec 2010	1	N			
19-1/1	New Nuke CWIP TO Acc Rec	2	N			
19-2	New Nuke Work Order Summary	1	N			
19-3	CWIP Acc Balance	1	N			
40-1/1	GL to Filing Rec	2	Ν			
43-1	Percentage Tested	1	N		-	
43-2	Ledger Detail Jan to Jun	81	N	Pages 1, 4- 21, 33, 42-46, 64, 70-81		
			Y	Page 2 Lines 1-10 Column 1	(e)	Brenda Thompson
				Page 3 Lines 1-16 Column 1	(e)	
				Page 22 Lines	(e), (f)	

Document	Description	No. of	Conf.	Line	Florida	Affiant
		Pages	Y/N	No./Col. No.	Statute 366.093 (3) Subsection	
				1-39 Column 1		
				Page 23 Lines 1-21 Column 1	(e), (f)	
				Page 24 Lines 1-23 Column 1	(e), (f)	
				Page 25 Lines 1-17 Column 1	(e), (f)	
				Page 26 Lines 1-27 Column 1	(e), (f)	
				Page 27 Lines 1-22 Column 1	(e), (f)	
		×		Page 28 Lines 1-34 Column 1	(e), (f)	
				Page 29 Lines 1-17 Column 1	(e), (f)	
				Page 30 Lines 1-22 Column 1	(e), (f)	
				Page 31 Lines 1-23 Column 1	(e), (f)	
				Page 32 Lines 1-4 Column 1	(e), (f)	
				Page 34 Lines 1-12 Column	(d), (e)	
				1, Line 13 Column 2	(e), (f)	
				Page 35 Lines 1-2 Column 1	(d), (e)	

Document	Description	No. of	Conf.	Line	Florida	Affiant
		Pages	Y/N	No./Col. No.	Statute 366.093 (3) Subsection	
				Page 36 Lines 1-31 Column 1	(d), (e)	
				Page 37 Lines 1-13, 15-33, 37-41, 42-44 Column 1,	(d), (e)	
				Lines 14, 34- 36 Column 2	(e)	
		2		Page 38 Lines 1-22, 24-28, 29-33, 35-47 Column 1,	(d), (e)	
				Lines 23, 34 Column 2	(e)	
	a J			Page 39 Lines 1-24 Column 1	(d), (e)	
				Page 40 Line 1 Column 1	(d), (e)	
				Page 41 Line 2 Column 1,	(d), (e)	
				Line 1 Column 2	(e)	
				Page 47 Lines 1-4 Column 1	(d), (e)	
				Page 48 Lines 1-18 Column 1	(d), (e)	
				Page 49 Lines 1-6 Column 1	(d), (e)	
				Pages 50-51 Lines 1-4 Column 1	(d), (e)	
				Page 52 Lines 1-31 Column 1	(d), (e)	
				Pages 53-62 Lines 1-53	(d), (e)	

Document	Description	No. of	Conf.	Line	Florida	Affiant
		Pages	Y/N	No./Col. No.	Statute 366.093 (3)	
					Subsection	
				Column 1		
				Page 63 Lines 1-20 Column 1	(d), (e)	
				Page 65 Lines 1-21 Column 1	(d), (e)	
	U III			Page 66 Lines 1-25 Column 1	(d), (e)	
				Pages 67-68 Lines 1-35 Column 1	(d), (e)	
				Page 69 Lines 1-18 Column 1	(d), (e)	
43-2/1	Payroll Sample Jan to Jun	3	Y	Page 1 Lines 1-2, 8-10, 12- 17 Column 15 & Line 20 Column 13	(f)	Brenda Thompson
				Page 2 Lines 21, 26, 55-59, 62, 72 Column 13 & Lines 29, 58- 59, 62 Column 15	(f)	
				Page 3 Lines 77-80, 84-85 Column 13 and Line 85 Column 15	(f)	
43-2/1-1	Eng and Cnst Bonus by Project	3	N			
43-2/1-2	Payroll Sample 6	1	N		5	
43-2/1-2/1	New Nuke Construction Project Bonus	6	N			
43-2/1-3	Payroll Sample 29	1	Y	Page 1 Lines 1-2	(e)	Brenda Thompson

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
43-2/1-4	Payroll Sample 84	4	N			
43-2/1-5	Project Development Bonus	1	N			
43-2/1-6	Sample Question Responses	2	N			
43-2/2	Vehicle Sample Jan to Jun	1	N			
43-2/3	CV Sample Jan to Jun	9	Y	Pages 1 Line 1	(e)	Brenda Thompson
				Page 2 Line 1	(d), (e)	
				Page 3 Line 1	(d), (e)	
				Page 4 Lines 1-4	(d), (e)	
		h 713		Pages 5 Lines 1-6	(d), (e)	
				Page 6 Lines 1-4	(d), (e)	
				Page 7 Lines 1-4	(d), (e)	
				Page 8 Lines 1-3	(d), (e)	
			N	Page 9		
43-2/3-1	Sample - Additional Support	1	N			
43-2/3-2	Lobby Exp	8	N			
43-2/3-3	Lobby Exp	4	N			
43-2/4	JV Sample Jan to Jun	3	Y	Page 1 Line 9, Column 1	(d), (e)	Brenda Thompson
				Page 2 Lines, 20-21 Column	(d), (e)	
à				1, Lines 12, 16- 17 Column 2	(f)	
	2			Page 3 Lines 24-26 Column 1	(f)	
43-2/4-1	Clean and Safe Nuke Handout	8	N			
43-2/4-2	Monthly Incentive	1	N		53	

Document	Description	No. of	Conf. Y/N	Line No./Col. No.	Florida Statute	Affiant
		Pages	T/IN	NO./COI. NO.	366.093 (3) Subsection	
	Bonus Accrual					
43-2/4-3	JV Sample #18 Amtz of FEMA	3	N	Page 1		
			Y	Pages 2-3 Lines 1-2 Column 1	(d), (e)	Brenda Thompson
43-3	Ledger Detail Jul to Sep	39	Y	Page 1 Column 1	(e)	Brenda Thompson
				Pages 28-33 Column 1	(d), (e)	
			N	Pages 2-9, 21, 36-39		
			Y	Page 10 Lines 1-21 Column 1	(e), (f)	
	2.			Pages 11-16 Column 1	(e), (f)	
8			N	Page 17		
			Y	Page 18 Lines 1-18 Column 1	(d), (e)	
				Page 19 Lines 1-48 Column 1	(d), (e)	
				Page 20 Lines 1-21 Column 1	(d), (e)	
				Page 22 Lines 1-3 Column 1	(d), (e)	
				Page 23 Lines 1-7 Column 1	(d), (e)	
				Page 24 Lines 1-2 Column 1	(d), (e)	
				Pages 25-26 Lines 1-5 Column 1	(d), (e)	

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute	Affiant
		Tuges		10.000.110.	366.093 (3) Subsection	
	A.			Page 27 Lines 1-11 Column 1	(d), (e)	
				Page 34 Lines 1-58 Column 1	(d), (e)	6
				Page 35 Lines 1-17 Column 1	(d), (e)	
43-3/1	Payroll Sample Jul to Sep	2	Y	Page 1 Lines 1-2, 7-9 Column 15, Lines 4-6 Column 13	(e), (f)	Brenda Thompson
				Page 2 Line 10 Column 15, Lines 11- 26 Column 13	(e), (f)	
43-3/2	CV Sample Jul to Sep	10	Y	Page 1 Lines 2-6 Column 1	(d), (e)	Brenda Thompson
				Page 2 Lines 8-16 Column 1	(d), (e)	
				Page 3 Lines 17-20 Column 1	(d), (e)	
				Page 4 Lines 27-28, 30-32 Column 1	(d), (e)	
	a.		12	Pages 5 Line 33 Column 1	(d), (e)	
				Page 6 Line 6 Column 1	(d), (e)	
			N	Page 7		
			Y	Page 8 Line 19-20 Column 1	(d), (e)	
				Page 9 Line	(d), (e)	

Document	Description	No. of	Conf.	Line	Florida	Affiant
		Pages	Y/N	No./Col. No.	Statute 366.093 (3) Subsection	
				31 Column 1 Page 10 Line 35 Column 1	(d), (e)	
43-3/3	JV Sample Jul to Sep	2	N			
43-3/4	Site Selection Sample Jul to Sep	1	N		1	
43-4	Ledger Detail Oct to Dec	39	Y	Page 1 Column 1	(e), (f)	Brenda Thompson
			N	Pages 2-9, 21, 25, 35-39		
			Y	Page 10 Lines 1-16 Column 1	(e), (f)	
			đ	Pages 11-17 Column 1	(e), (f)	
		đ		Page 18 Lines 1-27 Column 1	(d), (e)	2 2
				Page 19 Lines 1-44 Column 1	(d), (e)	
				Page 20 Lines 1-3 Column 1	(d), (e)	
				Pages 22-23 Line 1 Column 1	(d), (e)	
				Page 24 Lines 1-13 Column 1	(d), (e)	
				Page 26 Lines 1-42 Column 1	(d), (e)	
				Pages 27-32 Column 1	(d), (e)	
			<u>)</u>	Page 33 Lines 1-32 Column 1	(d), (e)	
				Page 34 Lines	(d), (e)	

Document	Description	No. of	Conf.	Line	Florida	Affiant
		Pages	Y/N	No./Col. No.	Statute 366.093 (3) Subsection	
				1-40 Column 1		
43-4/1	4 <sup>th</sup> Qtr Payroll Sample - Pre-Con	1	Y	Page 1 Lines 6-8, 11-16 Column 1	(e), (f)	Brenda Thompson
43-4/2	4 <sup>th</sup> Qtr CV Sample - Pre-Con	3	Y	Page 1 Lines 17-30 Column 1	(d), (e)	Brenda Thompson
				Page 2 Lines 31-40, 42-43 Column 1, Line 42 Column 2	(d), (e)	
				Page 3 Lines 46-48 Column 1, Lines 51-54 Column 2	(d), (e)	
43-4/2-1	APOG 1 <sup>st</sup> Amendment	6	Y	Pages 1-2, 4- 6 ALL	(d), (e)	Brenda Thompson
10 1/0 1/1	4500.4		N Y	Page 3		Decede
43-4/2-1/1	APOG Agreement	2	Y	All	(d), (e)	Brenda Thompson
43-4/3	4 <sup>th</sup> Qtr JV Sample- Pre-Con	1	Y	Page 1 Lines 55, 57-60 Column 1	(d), (e)	Brenda Thompson
43-4/4	4 <sup>th</sup> Qtr Site Sel Sample	1	N			
43-4/4-1	AFUDC Calculation Avoided and Reclassed 4 <sup>th</sup> Qtr	25	N			
43-4/4-2	Applied AFUDC 4 <sup>th</sup> Qtr	7	N			
44-1	Test Year Change Orders by PO	2	Y	Pages 1-2 Column 1	(d), (e)	Brenda Thompson
44-1/1	Purchase Orders	3	Y	Page 1 Lines 2-4 Column 1 Page 2 Lines	(d), (e)	Brenda Thompson
				5-11 Column 1		
				Page 3 Lines 12-16 Column		

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute	Affiant
		i ugoo			366.093 (3) Subsection	
				1		
44-1/2	Change Orders	6	Y	Page 1 Lines 1-3 Column 1	(d), (e)	Brenda Thompson
				Page 2 Lines 4-5 Column 1		
				Page 3 Lines 6-10 Column 1		
				Page 4 Lines 11-17 Column 1		
				Page 5 Lines 18-22 Column 1		
				Page 6 Line 23 Column 1		
44-2	Contracts to Ledger Rec	4	Y	Pages 1 Columns 1-2	(d), (e)	Brenda Thompson
				Pages 2-4 Column 1		
45-1	Schedule T-6 Adj Per Ledger	1	N			
45-3	T-6 Adj	2	N			
46	Payroll	1	N			
46-1	Payroll Rec	1	Y	Page 1 Lines 1-4 Columns 1-3	(e)	Brenda Thompson
46-2	Payroll Analysis	3	Y	Pages 1-3 Column 1	(e), (f)	Brenda Thompson
46-2/1	Jan to Jun Payroll Summary	1	N			
46-2/1-1	Jan to Jun Payroll by Emp	2	Y	Pages 1-2 Columns 1&2	(e), (f)	Brenda Thompson
46-2/2	Jul to Sep Payroll Summary	1	N			
46-2/2-1	Jul to Sep Payroll by Emp	2	Y	Pages 1-2 Columns 1&2	(e), (f)	Brenda Thompson
46-2/3	Oct to Dec Payroll Summary	1	N			

Document	Description	No. of	Conf. Y/N	Line No./Col. No.	Florida Statute	Affiant
		Pages	T/IN	NO./COI. NO.	366.093 (3) Subsection	
46-2/3-1	Oct to Dec Payroll by Emp	2	Y	Pages 1-2 Columns 1&2	(e), (f)	Brenda Thompson
46-2/4	New Nuke Labor Percentage Recalculation	4	Y	Pages 1-4 Columns 1-2	(f)	Brenda Thompson
46-2/4-1	Emp Total Working Hrs	2	Y	Pages 1-2 Column 1	(f)	Brenda Thompson
46-2/4-2	New Nuke Hrs by WO	2	Y	Pages 1-2 Column 1	(f)	Brenda Thompson
46-2/5	Employee Hours Allocation Test	2	Y	Pages 1-2 Column 1	(f)	Brenda Thompson
46-2/5-1	Expense Type	1	N			
46-2/5-2	Difference in Total Hours	2	Y	Page 1 Line 1 Column 1	(f)	Brenda Thompson
				Page 2 Column 1	(f)	
46-4	Signing Bonuses by Emp	1	Y	Page 1 Column 1 Line 1	(e), (f)	Brenda Thompson
46-5	Relocation Exp by Emp	1	Y	Page 1 Column 1	(e), (f)	Brenda Thompson
47-1	2009 Tax Return	3	Y	ALL	(e)	Brenda Thompson
47-2	2010 Annualized Internal Payroll	1	Y	Page 1 Lines 1-9 Columns 1-2	(e)	Brenda Thompson
47-2/1	Cost by EAC: Jan to Oct	1	N			
47-2/1-1	EAC Description	5	N			
47-2/2	2010 Project Cost by WO	3	Y	Page 1 Lines 1-33 Columns 1-13	(d), (e)	Brenda Thompson
				Page 2 Lines 1-8 Columns 1-13	(e)	Brenda Thompson
			N	Page 3		
47-3	May 2010 Payroll Adj Carrying Cost	1	N			

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
47-3/1	Schedule T-2: Pre- Con May 2010 Payroll Adj Carrying Cost Cal	2	N			
47-3/2	Schedule T-3: DTCC on May 2010 Payroll Adj Calculation	2	N	0		
47-3/3	Jurisdictional Cost on May 2010 Payroll Adj: Sch T-6	1	N		ii	
47-3/3-1	Total Payroll	12	N	Pages 1, 7-8		
	Reclassed from Non-Incremental to Recoverable		Y	Page 2-6, 9- 12 Column 1	(e), (f)	Brenda Thompson
47-3/3-2	Reclassed Payroll to Correct WO - May 2010	3	Y	Pages 1-2 Column 1	(f)	Brenda Thompson
			N	Page 3		
47-3/4	May Carrying Cost Recal	1	N			
47-4	June 2010 Payroll Adj Carrying Cost	1	N			
47-4/1	Schedule T-2: Pre- Con June 2010 Payroll Adj Carrying Cost Cal	2	N			
47-4/2	Schedule T-3: DTCC on Payroll Adj Calculation June 2010	2	N			
47-4/3	Jurisdictional Cost on June 2010 Payroll Adj: Sch T-6	1	N			
47-4/3-1	Resource Assessment & Planning Payroll Reclass Entry	9	Y	Pages 1-7 Column 1 Pages 8-9	(f)	Brenda Thompson
47-4/4	June Carrying Cost Adj Recal	1	N			
49	Affiliate Charges	2	Y	Page 1 Lines 1-20 Page 2 Lines 1-12	(e)	Brenda Thompson
49-1	Affiliate Charges Per GL	1	Y	Page 1 Column 1	(e)	Brenda Thompson

Document	Description	No. of	Conf.	Line	Florida	Affiant
		Pages	Y/N	No./Col. No.	Statute 366.093 (3) Subsection	
49-2	Affiliate Charges- Detail Transaction Report	1	Y	Page 1 Column 1	(e)	Brenda Thompson
49-2/1	Affiliate Charge Breakdown	2	Y	Page 1 Column 1,	(f)	Brenda Thompson
				Columns 2-7 & Lines 1-8	(e)	- 29
				Page 2 Column 1,	(f)	
				Columns 2-7 & Lines 1-13	(e)	
49-2/1-1	Payroll Report for Affiliates	49	Y	Pages 1-2, 25-26 Column 1	(f)	Brenda Thompson
		×		Pages 17, 42 Line 1	(f)	
				Pages 28,35, 38, 49 Line 1	(f)	
	i. K		N	Pages 3-16, 18-24, 27, 29- 34, 36-37, 39- 41, 43-48		
49-3	List of affiliate Services	1	N			
49-3/1	Job Descriptions	2	Y	Page 1 Lines 1-2	(f)	Brenda Thompson
				Page 2 Line 1		
49-4	Actual to Estimate Rate Rec	1	Y	ALL	(e)	Brenda Thompson
49-4/1	Overhead Rates	7	Y	ALL	(e)	Brenda Thompson
49-5	Lower of Cost or Market Test	1	Y	ALL	(e)	Brenda Thompson
49-5/1	Lower of Cost or Market Analysis	5	Y	Page 1 Lines 1-3	(e)	Brenda Thompson
				Page 3 Columns 1-5	(e)	
				Page 4 Line 1	(e)	

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				& Column 1		
			N	Pages 2, 5	ũ.	
49-5/2	Market Rates	5	Y	Page 1 Columns 1-2, Lines 1-3	(d), (e)	Brenda Thompson
		4) 		Pages 2, 4-5 Line 1 & Column 1	(d), (e)	
	÷			Page 3 Line 1 & Columns 1- 2	(d), (e)	

# **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

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AFFIDAVIT OF BRENDA THOMPSON

**BEFORE ME**, the undersigned authority, personally appeared Brenda Thompson who, being first duly sworn, deposes and says:

1. My name is Brenda Thompson. I am currently employed by Florida Power & Light Company as Nuclear Project Controls Manager. I have personal knowledge of the matters stated in this affidavit.

I have reviewed the documents that are the subject of FPL's First Request for 2. Extension of Confidential Classification of Audit 11-024-4-1Work 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 Additionally, these materials contain competitively sensitive information related to terms. 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. These documents also contain competitively sensitive information reflected in FPL's tax returns and related to NextEra Energy Resource's cost structure which, if publicly disclosed, could harm NextEra Energy Resource's competitive interests. Finally, these documents include employee social security numbers, which FPL has a duty to maintain as confidential. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

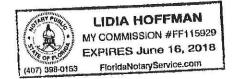
3. No significant changes have occurred since the issuance of Order No. PSC-14-0292-CFO-EI to render the information identified in Revised Exhibit C stale or public such that continued confidential treatment would not be appropriate. Additionally, this information will continue to be confidential for 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.

Brenda Thompson

Notary Public, State of Florida

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

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

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### AFFIDAVIT OF ANTONIO MACEO

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

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

I have reviewed the documents that are the subject of FPL's First Request for 2. Extension of Confidential Classification of Audit 11-024-4-1 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.

No significant changes have occurred since the issuance of Order No. PSC-14-3. 0292-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.

Affiant says nothing further. 4.

Antonio Maceo

day of December 2015, by SWORN TO AND SUBSCRIBED before me this Antonio Maceo who is personally known to me or who has produced (type of identification) as identification and who did take an oath.

CAROLYN J SMITH

My Commission



Notary Public State of Florida