

FILED APR 29, 2016 DOCUMENT NO. 02621-16 FPSC - COMMISSION CLERK

Jessica A. Cano Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 (561) 304-5226 (561) 691-7135 (Facsimile)

April 29, 2016

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. 160009-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 12-010-4-2 Work Papers, including Revised Exhibit C and Revised Exhibit D.

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

Sincerely,

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 |) | Docket No. 160009-EI |
|---------------------|---|-----------------------|
| Recovery Clause |) | Filed: April 29, 2016 |

FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF AUDIT CONTROL NO. 12-010-4-2 WORK PAPERS

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests continued confidential classification of Audit Control No. 12-010-4-2 Work Papers (the "Audit Work Papers"). In support of its request, FPL states as follows:

- 1. On June 21, 2012, in Docket No. 120009-EI, FPL filed a Request for Confidential Classification of the Audit Work Papers (Confidential Document No. 04112-12). FPL's request was granted by Order No. PSC-14-0624-CFO-EI, issued October 29, 2014. The period of confidential treatment granted by Order No. PSC-14-0624-CFO-EI will soon expire. FPL has reviewed the confidential documents and determined that all the information that was the subject of Order No. PSC-14-0624-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 21, 2012 filing are incorporated herein by reference. Included herewith are Revised Exhibit C and Revised Exhibit D, containing the affidavits of Stephanie Castaneda and Antonio Maceo in support of FPL's request.
- 2. The information that was granted confidential treatment by Order No. PSC-14-0624-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.

3. 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 FPL's internal auditors. This information is protected from public disclosure by Section 366.093(3)(b), Florida Statutes. The Audit 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 Audit Work Papers also contain 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. 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 cell phone numbers and 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-14-0624-CFO-EI to render the confidential information stale or public, such that continued confidential treatment would not be appropriate. Accordingly, FPL requests that confidential treatment be extended for a period of not less than an additional 18 months.
- 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 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 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

<u>s/ Jessica A.</u> Cano Jessica A. Cano Fla. Bar No. 0037372

By:

CERTIFICATE OF SERVICE DOCKET NO. 160009-EI

I HEREBY CERTIFY that a true and correct copy of FPL's First Request for Extension of Confidential Classification of Audit 12-010-4-2 Work Papers* was served electronically this 29th day of April, 2016, 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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Attorneys for the Florida Retail Federation

By: <u>s/Jessica A. Cano</u> 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.

Revised Exhibit C

Company: Florida Power and Light Company Title: List of Confidential Workpapers Audit #12-010-4-2 Docket No. 120009-EI

| Document | Description | No. of Pages | Conf. Y/N | Line No./Col. No. | Florida Statute 366.093 (3) Subsection | Affiant |
|-------------|---------------------------------------|-----------------|--------------|---|---|------------------------|
| Index | Confidential Index | 2 | N | | | |
| 2-15 | Schedule T-7A | 7 | Y | Pages 1-7 Columns A-D | (d), (e) | Stephanie Castaneda |
| 8-1 | Organizational Chart | 7 | N | | | |
| 8-2 | Organizational Chart | 5 | N | | | |
| 9-1 | List of Internal Audits | 3 | Y | Pages 1-3 All | (b) | Antonio Maceo |
| 9-2 | Notes on Internal Audits | 13 | Y | Pages 1-13 All | (b) | Antonio Maceo |
| 12-1 | Filing to Ledger Reconciliation | 1 | N | | | |
| 12-1/2 | 2012 Entries | 2 | Y | Page 1 Column A | (f) | Stephanie Castaneda |
| | | | N | Page 2 | | |
| 12-1/3 | Balances Per Excerpts | 3 | N | | | |
| 12-2 | CWIP Reconciliation: Filing to Ledger | 1 , | N | | | |
| 12-3 | Transmission Projects Summary | 1 | N | | - | |
| 16-2/1-1 | Salvage Support | 1 | Y | Page 1 All | (d), (e) | Stephanie Castaneda |
| 19 p2 | Transmission Excluded | 1 | N | | | |
| 19-1 | CWIP Sample | 10 | N | Pages 1, 7 | | |
| | | | Y | Page 2 Lines 52, 54 Column A; | (d), (e) | Stephanie Castaneda |
| is a second | | | | Lines 25-27, 35-40, Column B | (e), (f) | |
| | | | | Page 3 Lines 55-58, 60, 68, 73-75 Column A | (d), (e) | |
| ė | | | | Page 4 Lines 76-91, 93, 97- | | |

| Document | Description | No. of | Conf. | Line | Florida | Affiant |
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| | | Pages | Y/N | No./Col. No. | Statute 366.093 (3) | |
| | | | | | Subsection | |
| | | 14 | | 98 Column A; Lines 80-81, 84-85 Column B | | |
| g. | | | | Page 5 Lines 99, 110-121 Column A; Lines 101-106, 121 Column B | 2 | |
| | | | | Page 6 Lines 122-124 Columns A-B | | |
| | | | | Page 8 Lines 14-15, 18-20 Column A; Lines 14, 18-19 Column B | | |
| | | | | Page 9 Lines 21-36 Column A; Lines 21-25, 27, 31-32, 35 Column B | | |
| | | | | Page 10 Lines 38-39, 45-46 Column A; Line 39 Column B | | |
| 19-1/1 | CWIP Sample Follow-up | 2 | N | | | |
| 19-1/2 | CWIP Sample Support | 6 | N | | 2334535 13254 | |
| 19-2 | CWIP Sample | 2 | Y | Page 1 Column A; Lines 1-22 Column B | (d), (e) | Stephanie Castaneda |
| 10.3 | P 77 1 12 | | N | Page 2 | | |
| 19-3 | Appendix E Adj | 2 | N | D. 1.2 | | 1) |
| 19-3/2 | Appendix E Adj Support | 3 | N Y | Page 1-2 Page 3 Line 1 | (f) | Stephanie Castaneda |
| 21-1 | Contract Compliance log | 3 | N | | | |
| 21-2 | Contract Compliance log | 3 | N | | | |
| 21-3 | Contracts Executed | 28 | Y | Page 1 Lines 1, | (d), (e) | Stephanie |

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| | in 2011 | | | 3-4 Column A; | Subsection | Castaneda |
| | | | | Lines 1-7 | | |
| | | | | Column C | | |
| | | | | Page 2 Lines 8, | | |
| | | | | 11 Column A; | | |
| | | | | Lines 8, 12-13 | | |
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| | | | (40 | Column C | | |
| | | | | Page 3 Lines | | |
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| | | | | 25 Column A; | | |
| | | | | Column C | | |
| | | | | Page 4 Lines | 11. | |
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| | | | | Column C | | |
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| | | | | 40-46 Column | | |
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| | | | | 47-53 Columns | | |
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| | | | | Page 8 Lines | | |
| | | | | 57-62 Columns A-B; Column C | | |
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| | | | | Page 28 Columns A, C | | |
| 25-1 | Affiliate Transactions | 3 | Y | Page 1 Columns A-F | (e) | Stephanie Castaneda |
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| 25-1/1 | Affiliate Station Operator | 1 | Y | Page 1 Lines 1- | (d), (e) | Stephanie Castaneda |
| 25-2 | Loader Rates Calculation Narrative | 2 | Y | Pages 1-2 All | (e) | Stephanie Castaneda |
| 25-3 | Loader Rates | 7 | Y | Pages 1-7 All | (e) | Stephanie Castaneda |
| 25-4 | Lower of Cost or Market | 1 | Y | Page 1 Columns A-C & Lines 1-2 | (e) | Stephanie Castaneda |
| 25-4/1 | Lower of Cost or Market | 3 | Y | Page 1 Columns A-H & Lines 1-2 | (d), (e) | Stephanie Castaneda |
| | | | | Pages 2-3 Column A | | |
| 25-5 | Job Description | 4 | N | | | |
| 28-2 | CPI Rates | 4 | N | | | |
| 43-1 | O&M Sample | 3 | Y | Page 1 Lines 2, 4-5, 9-14 Column A | (d), (e) | Stephanie Castaneda |
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| | | | | A | Subsection | |
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| | | | N | Page 3 | | |
| 43-2 | O&M Sample | 2 | Y | Page 1 Lines 1- 7, 9 Column A; Line 8 Column B | (d), (e) | Stephanie Castaneda |
| | | | | Page 2 Lines 2- 3, 6-9, 11, 13 Column A; Lines 1, 4-6, 10, 12 Column B | | |
| 43-2/1 | O&M Sample Follow-up | 1 | N | | | |
| 43-3 | Appendix F Adj | 2 | N | | | |
| 43-4 | O&M Participation Credit Recalculation | 3 | N | | | |
| 44-1 | Payroll | 1 | Y | Page 1 Line 1 | (f) | Stephanie Castaneda |
| 44-2 | Payroll Analysis | 2 | Y | Pages 1-2 Columns A-C | (e), (f) | Stephanie Castaneda |
| 44-2/1 | Payroll Allocation | I | Y | Page 1 Lines 1- 6 | (f) | Stephanie Castaneda |
| 44-2/2 | Payroll Adjustment | 1 | Y | Page 1 Column A | (f) | Stephanie Castaneda |
| 44-2/2-1 | Payroll Adjustment | 1 | Y | Page 1 Column A | (f) | Stephanie Castaneda |
| 44-2/3 | Payroll Adjustment | 1 | Y | Page 1 Line 1 | (e), (f) | Stephanie Castaneda |
| 44-2/4 | Payroll Adjustment | 4 | Y | Page 1 Lines 1- | (f) | Stephanie Castaneda |
| × | | | Y | Page 2-4 Line 1 | | |
| 44-2/5 | 1st Qtr Payroll Adjustments | 2 | Y | Page 1 Column A | (f) | Stephanie Castaneda |
| 44-2/6 | 2nd Qtr Payroll | 4 | N Y | Page 2 | (a) (b) | Stanbania |
| 44-2/0 | Adjustments | 4 | ĭ | Pages 1-4 Column A | (e), (f) | Stephanie Castaneda |
| 44-2/7 | 3rd Qtr Payroll Adjustments | 5 | Y | Page 1 Column A-B | (e), (f) | Stephanie Castaneda |
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| 44-2/8 | 4th Qtr Payroll | 5 | Y | Page 1 Column | (e), (f) | Stephanie |

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| | Adjustments | | | A-B | | Castaneda |
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| 44-2/9 | Non-incremental Adjustment | 3 | Y | Pages 1-3 Column A | (e), (f) | Stephanie Castaneda |
| 44-2/10 | Reversal of (2) 2nd Qtr Payroll Adjustments | 1 | Y | Page 1 Lines 1- 9 | (e), (f) | Stephanie Castaneda |
| 45-1 | Separate and Apart Procedures | 7 | N | | | |
| 45-2 | Justification Index | 2 | Y | Pages 1-2 Column A | (d), (e) | Stephanie Castaneda |
| 45-2/1 | Justification Forms | 16 | Y | Pages 1-6, 12- 13, 15 Line 1 Page 7 Lines 1- | (d), (e) | Stephanie Castaneda |
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| | | | N | Pages 9, 11, 14, 16 | | |
| 45-2/2 | Justification Forms | 18 | Y | Pages 1-5, 11, 15-16, 18 Line 1 | (d), (e) | Stephanie Castaneda |
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| | | | | Page 13 Lines 1-2 | | |
| | | | N | Pages 7-10, 12, 14, 17 | | |
| 54-1/1 | 2011 Tax Estimates | 5 | Y | Pages 1-5 All | (e) | Stephanie Castaneda |
| 54-1/2 | 2010 Actual Tax Adj. | 1 | Y | Page 1 All | (e) | Stephanie Castaneda |
| 54-2 | 2010 Tax Return | 5 | Y | Pages 1-5 All | (e) | Stephanie Castaneda |

REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Nuclear Cost Recovery Clause |) _) | DOCKET NO. 160009- | ·EI |
|---|---|---|--|
| STATE OF FLORIDA MIAMI-DADE COUNTY |))) | AFFIDAVIT OF ANT | ONIO MACEO |
| BEFORE ME, the being first duly sworn, depos | undersigned authority, ses and says: | , personally appeared A | antonio Maceo who, |
| My name is A Company ("FPL") as Manaş this affidavit. | Antonio Maceo. I am c ger of Auditing. I have | currently employed by Floe e personal knowledge of | orida Power & Light the matters stated in |
| 2. I have review Extension of Confidential identified on Revised Exhibition related to report Internal Auditing department status of internal auditing strelease of information relations to the best of my knowledge, materials. | Classification of Audit of C as the affiant. The soft internal auditors. It is essential for the dependence, process, findings and to reports of international freet the effectiveness of | The documents that I hat Full and frank disclosure partment to fulfill its roles, and reports supports a auditors would be haut the Internal Auditing of the Internal Auditing of | ers, for which I am we reviewed contain of information to the and the confidential such disclosure. The rmful to FPL and its department itself. To |
| 3. No significant 0624-CFO-EI to render the continued confidential treatment on the maintained at the Commission to conduct of these documents. 4. Affiant says to the conduct of these documents. | information identified in ment would not be appi as confidential for an a eturned to FPL as soon its business so that FPI | ropriate. Accordingly, thing additional period of not a sthe information is no | le or public such that is information should less than 18 months. longer necessary for |
| SWORN TO AND Maceo who is personally lidentification) as identification | known to me or who | me this 29 day of Ap has produced day of Ap oath. | Carrew |
| My Commission Expires: | *** | Notary Public, State of | Florida |



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Nuclear Cost Recovery Clause | _) | DOCKET NO. 160009-EI |
|--|----|----------------------------------|
| STATE OF FLORIDA |) | AFFIDAVIT OF STEPHANIE CASTANEDA |
| PALM BEACH COUNTY |) | AFFIDAVII OF STEPHANIE CASTANEDA |

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

- 1. My name is Stephanie Castaneda. I am currently employed by Florida Power & Light Company ("FPL") as Nuclear Business Operations, Fleet Accounting and Regulatory Compliance. 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 12-10-4-2 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 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. These documents include employee cell phone numbers and social security numbers which FPL has an obligation to maintain as confidential. Finally, these documents contain proprietary confidential business information related to Florida Power & Light Company's tax returns and NextEra Energy Resources' cost structure and proprietary processes. information is competitively sensitive to FPL and NextEra Energy Resources, and disclosure of this information would work to the detriment of FPL'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-14-0624-CFO-EI to render the information identified in Revised Exhibit C stale or public such that continued confidential treatment would not be appropriate. Accordingly, this information should continue to be maintained as confidential for an additional period of not less than 18 months. 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.

Stephanie Castaneda

SWORN TO AND SUBSCRIBED before me this day of April 2016, by Stephanie Castaneda, who is personally known to me or who has produced type of identification) as identification and who did take an oath.

JO RETHA FORBES

Notary Public - State of Florida
My Comm. Expires Mar 8, 2018
Commission # FF 090102

My Commission Expires: