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January 26, 2018

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED-FPSC
2018 JAN 26 PM 12:48
COMMISSION
CLERK

Re: Docket No. 20160251-EI

REDACTED

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Materials Provided Pursuant to Audit No. 2017-297-1-1. The request includes Exhibits A, B (two copies), C and D.

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 is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declarations in support of FPL's Request for Confidential Classification.

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

Sincerely,

Kevin I.C. Donaldson

Enclosure

cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

- COM _____
- AFD 1 redacted copy of Exh. B
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company for Limited Proceeding for Recovery of Incremental Storm Restoration Costs Related to Hurricane Matthew	Docket No. 160251-EI Filed: January 26, 2018
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**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2017-297-1-1**

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. 2017-297-1-1 ("the Audit"). In support of this request, FPL states as follows:

1. During the Audit, FPL provided Staff with various confidential documents. By letter dated January 5, 2018 Staff indicated its intent to retain certain audit work papers. Pursuant to Rule 25-22.006(3)(a), 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 files 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 consists of a copy the confidential documents, on 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, on which all the information that is entitled to confidential treatment under Florida law has been redacted.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A by page and line and a brief description of the confidential information.

Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarant who supports the requested classification.

d. Exhibit D contains the declaration of Barry Wilkinson in support of this 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, and its confidentiality has been maintained. Pursuant to Section 366.093, 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 described more fully in the declaration included as Exhibit D, certain documents contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

5. Also, certain information in these documents concern FPL's competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

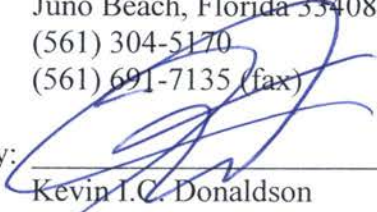
6. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least thirty-six (36) months and should be returned to

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 this 26th day of January, 2018.

John T. Butler
Assistant General Counsel-Regulatory
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Kenneth Rubin
Senior Counsel
Ken.Rubin@fpl.com
Kevin I.C. Donaldson
Senior Attorney
kevin.donaldson@fpl.com
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700 Universe Boulevard
Juno Beach, Florida 33408
(561) 304-5170
(561) 691-7135 (fax)

By: 

Kevin I.C. Donaldson
Florida Bar No. 0833401

CERTIFICATE OF SERVICE

Docket No. 20160251-EI

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification* has been furnished by electronic mail this 26th day of January, 2018, to the following parties:

Suzanne Brownless
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-1400
sbrownle@psc.state.fl.us
**Office of the General Counsel
Florida Public Service Commission**

Jon C. Moyle, Jr.
Karen A. Putnal
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Power Users Group**

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Kelly.jr@leg.state.fl.us
Christensen.Patty@leg.state.fl.us
Rehwinkel.Charles@leg.state.fl.us
**Attorneys for the Citizens
of the State of Florida**

By: _____


Kevin I.C. Donaldson

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

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

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**FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT**

4 TO: Wally Goldscheck

UTILITY: Florida Power & Light Co.

5 AUDIT MANAGER: Donna Brown

PREPARED BY: Donna Brown 850-413-6469
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
ddbrown@psc.state.fl.us

12/15/17
DB

8 REQUEST NUMBER: 37

DATE OF REQUEST: 12/13/2017

9 AUDIT PURPOSE: Storm Recovery Cost Audit; Docket No.: 20160251-EI; ACN 2017-297-1-1

10 REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: 12/18/2017

11 REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: 9 INCIDENT TO AN INQUIRY
12 OUTSIDE OF AN INQUIRY

13 ITEM DESCRIPTION:

14 1. In reference to Doc. Ref. Number 0000295742, please provide a detailed explanation
15 as to the employees purpose in El Paso, Texas.

16 2. In reference to Doc. Ref. Number 1900461493, please provide a detailed description
17 of the transaction.

18 Response:

19 1. In reference to Doc. Ref. Number 0000295742, these charges are for an employee, Mary Ellen
20 Castor, who is part of the Customer Service Customer Care Outsource Team that works with
21 GC Services ("GCS"), our inbound call outsourcing vendor in El Paso, Texas. During a storm,
22 GCS is a critical partner in handling customer outage reports and providing outage status
23 updates to customers calling FPL. During Hurricane Matthew, Mary Ellen served as the FPL
24 in-house liaison on-site between FPL's Customer Care storm organization and GCS, providing
25 support to the representatives and management team. Being on-site, she is able to monitor
26 and ensure proper execution of our disaster readiness processes, and is available to execute
27 on business continuity plans from outside of the impacted area if that was to be required.

28 2. In reference to Doc. Ref. Number 1900461493, this [REDACTED] invoice is for pre-payment of
29 acquired lodging during Hurricane Matthew restoration. [REDACTED] received a wire transfer to
30 assist with credit card payments made to the hotels. This amount is deducted at the time the
31 final invoice is paid and a true-up to the prepayment is recognized.

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CONFIDENTIAL

33 TO: AUDIT MANAGER

DATE 12/15/17

34 THE REQUESTED RECORD OR DOCUMENTATION:

35 (1) HAS BEEN PROVIDED TODAY

36 (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY: _____

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO: 21060251-EI
DOCKET TITLE: Petition for Limited Proceeding for Recovery of Incremental Storm Restoration Costs Related to Hurricane Matthew
DATE: January 26, 2018

Workpaper Nos.	Description	No. of Pages	Conf. Y/N	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
WP 10-37	Logistic Sample Question	1	Y	Ln. 28a, 29a	(d), (e)	Barry Wilkinson

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's
Petition for Limited Proceeding for Recovery
of Incremental Storm Restoration Costs
Related to Hurricane Matthew

Docket No: 20160251-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

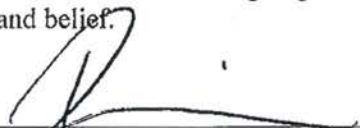
**WRITTEN DECLARATION OF
BARRY WILKINSON**

1. My name is Barry Wilkinson. I am currently employed by Florida Power & Light Company ("FPL") as a Manager of Integrated Supply Chain. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data. This information relates to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the document reveals the name of our third-party lodging supplier along with specific prepayment provisions that were agreed upon exclusively with this supplier. Disclosure of this information could impair our supplier relationship, and negate the significant leverage this supplier has during a storm event (in a seller's market) to secure critical hotel room availability necessary to house storm restoration personnel. It also impacts the efforts of FPL or its affiliates to contract for goods or services on favorable terms in the future, which in turn increases cost to FPL and its customers. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of thirty six (36) 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Barry Wilkinson

Date: 11/19/18