



**REDACTED**

Maria J. Moncada  
Senior Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
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(561) 691-7135 (Facsimile)  
E-mail: maria.moncada@fpl.com

June 20, 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 JUN 20 PM 2:46  
COMMISSION  
CLERK

**Re: Docket No. 20180007-EI**

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. 2018-036-4-1. 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 have or your Staff has any questions regarding this filing.

Sincerely,

Maria J. Moncada

Enclosures

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

6705394

COM \_\_\_  
AFD \_\_\_  
APA \_\_\_  
ECO \_\_\_  
ENG 1 \_\_\_  
GCL \_\_\_  
IDM \_\_\_  
CLK \_\_\_

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental Cost Recovery Clause

Docket No: 20180007-EI

Date: June 20, 2018

**FLORIDA POWER & LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2018-036-4-1**

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. 2018-036-4-1 ("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 May 30, 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 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 declarants who support of the requested classification.

d. Exhibit D contains the declarations of Lisa Fuca and Craig Arcari 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 declarations 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. Additionally, certain documents 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. This information is protected by Section 366.093(3)(e), Fla. Stat.

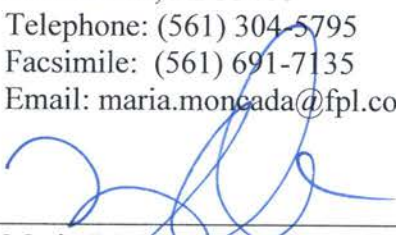
6. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least three (3) years and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

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

Respectfully submitted,

John T. Butler  
Assistant General Counsel - Regulatory  
Maria J. Moncada  
Senior Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 304-5795  
Facsimile: (561) 691-7135  
Email: maria.moncada@fpl.com

By: \_\_\_\_\_

  
Maria J. Moncada  
Florida Bar No. 0773301

**CERTIFICATE OF SERVICE**

**Docket No. 20180007-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification\* has been furnished by electronic mail on this 20th day of June 2018 to the following:

Charles Murphy, Esq.  
Office of the General Counsel  
**Florida Public Service Commission**  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
Cmurphy@psc.state.fl.us

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Regulatory Coordination  
**Tampa Electric Company**  
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Patricia Christensen, Esq.  
Charles Rehwinkel, Esq.  
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c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399  
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rehwinkel.charles@leg.state.fl.us

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jbrew@smxblaw.com  
law@smxblaw.com  
**Attorneys for White Springs Agricultural  
Chemicals, Inc. d/b/a/ PCS Phosphate –  
White Springs**

By: \_\_\_\_\_



Maria J. Moncada  
Florida Bar No. 0773301

\* 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**



.D.  
FEID # 65-0854041

9/29/2017 13:07

11/18  
22

Power Plant

Account: FPL Contract # 02366004

Monitoring & Reporting - Statistical Assessment

Reason for Travel	Auto Miles	Allowance	Airline	Ground Trans	Lodging	Meals Per Diem	Tolls	Total Cost
	0	0.00					0.00	0.00
		0.00						0.00
		0.00						0.00
ISE		0.00	0.00	0.00	0.00	0.00	0.00	\$ -

Professional Services	Dates	Hours	Cost
for objectives and requirements	8/1/2017		\$ 420.00
	8/15/2017		\$ 1,260.00
	9/1/2017		\$ 840.00
	9/15/2017		\$ 1,260.00
	9/17/2017		\$ 1,680.00

EXPENSE

Totals

hours

\$ 5,460.00

TOTAL AMOUNT DUE:

\$ 5,460.00

116-28.1

**CONFIDENTIAL**

Florida Power & Light Company  
Environmental Cost Recovery Clause  
Test Year Ended: December 2017  
Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1  
Description: *Project 47. Sample.*

SOURCE



116-28.2

**CONFIDENTIAL**

Florida Power & Light Company  
Environmental Cost Recovery Clause  
Test Year Ended: December 2017

Dkt. No.: 20180007-EJ; ACN No: 2018-036-4-1

Description: *Project 39 Sample*

*M.G.  
4/3/18  
[Signature]*

**FPSC CLAUSES AUDITS  
ADEQUATE SUPPORTING DOCUMENTATION  
AR #7 Project #39 Items #1**

Journal Vouchers

1. Copy of JV and supporting documentation including any worksheets.
2. Description of how Items included in JV relate to clause and how they are used to support clause programs.

Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

All of the items listed below are clause related because they involve routine maintenance and outage activities in support of the Martin Solar project maintenance.

Attached are the supporting documents for the accrual.

This accrual was re-accrued thru May and paid in June, 2017 per the attached invoices.

3. If correction supply original entry and explain reason for correction.

*\* Audit staff reviewed the supporting  
1 documentation in the amount of [REDACTED] <sup>A</sup>  
and did not maintain in work papers. No.*

SOURCE



**CONFIDENTIAL**

Florida Power & Light Comp.  
Environmental Cost Recovery Clause  
Test Year Ended: December 2017  
Dkt. No.: 20180007-El; ACN No: 2018-036-4-1  
Description: *Project 39 amole.*

*MG  
4/3/18  
JD*

**FPSC CLAUSES AUDITS  
ADEQUATE SUPPORTING DOCUMENTATION  
AR #7 Project #39 Item 2**

**M&S**

1. Item description and how that item relates to clause and how it supports clause programs.

The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

The pump seal listed below is clause related because it involves routine maintenance activities in support of the Martin solar facility.

- Several inboard and outboard seals for the Main HTF pumps were purchased from
- 1 [redacted] as non-M&S items. Seals that were not used immediately were returned to
  - 2 stores and entered into our inventory giving us a credit of [redacted] *16-29*

2. Copy of M&S record.

*Did not maintain supporting  
documentation in workpapers.  
Ma.*



*UKG  
4/3/18  
R*

FPSC CLAUSES AUDITS  
ADEQUATE SUPPORTING DOCUMENTATION  
AR #7, Item #3

Cash Vouchers

1. Vendors invoice
2. Purchase order
3. Contract with vendor, if applicable
4. Time sheets, etc. for contract labor
5. Explain how items on invoice relate to clause i.e., how are they used to support clause activity.

**CONFIDENTIAL**

The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

- 1 • The invoice in question <sup>10-29</sup> [redacted] is from the [redacted] <sup>B</sup> who was contracted to remove broken mirrors and replace them with new ones. This work is related to the clause because it involves routine maintenance activities in support of the Martin solar facility.
  - A copy of the purchase order and the invoice (with timesheets) are attached above.
6. If invoice is allocated between or among programs, indicate allocation percentage and rationale for allocation.
7. If it is advertising, provide the ads.

*Did not maintain supporting documentation in work papers.  
UKG.*

AR # 7

Project #39

#4

McAlice, Mary

PBC

From: Moncrief, Gary  
 Sent: Wednesday, March 21, 2018 11:51 AM  
 To: Vantuinen, Lorie; McAlice, Mary  
 Subject: RE: IMMEDIATE ACTION NEEDED - ECRC TRANSACTION AUDIT PROJECT #39

Mary, The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

- 1) The M&S items listed below are replacement mirrors for the solar field. This work is related to the clause because it involves routine maintenance activities in support of the Martin solar facility.
- 2) M&S record below...

**Material Document List**

Material	Material Description	Plant Name
Sloc Batch	MTR'S Mat. Doc	Used Pstng Date Qty in OnE EUn Amount in LC Order
0-772-452-000	MIRROR 400 X 1641 X 1700	0973-FWI MARTIN STOREROOM
00 261 4919290012	14 02/01/2017	30.00 EA
00 261 4919290012	15 02/01/2017	5.00 EA
00 261 4919290012	13 02/01/2017	9.00 EA
00 261 4919290012	12 02/01/2017	30.00 EA
00 261 4919290012	17 02/01/2017	5.00 EA

CONFIDENTIAL

Gary D. Moncrief Sr.  
 PGD Business Services Manager  
 Martin Power Plant  
 772-597-7101 (Office)  
 561-307-6674 (Cell)

16-29

From: Vantuinen, Lorie  
 Sent: Wednesday, March 21, 2018 9:57 AM  
 To: Moncrief, Gary; Trimnal, Mary  
 Cc: McAlice, Mary  
 Subject: IMMEDIATE ACTION NEEDED - ECRC TRANSACTION AUDIT PROJECT #39

Description:  
 Dkt. No.: 20180007-ER ACN No: 2018-036-4-1  
 Florida Power & Light Company  
 Environmental Cost Recovery Clause  
 Test Year Ended: December 2017  
 Project 39 Sample

16-29 A.1

4/3/18

SOURCE

PBC

### FPSC CLAUSES AUDITS ADEQUATE SUPPORTING DOCUMENTATION

M&S

1. Item description and how that item relates to clause and how it supports clause programs.
2. Copy of M&S record.

G00000129458	PMN SOLAR MIRROR& TUBES REPL	A08	5400102	M&S-PG/NU Stores OH	[REDACTED]	02/01/2017
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A

16-29

CONFIDENTIAL

Description:

Project 3A Sample

Florida, Inc. & Light Company  
 Environmental Cost Recovery Clause  
 Test Year Ended: December 2017  
 Dir. No.: 20180007-EE; ACN No: 2018-0364-1

MS  
4/3/18  
AL

16-29 A 2

*4/13/18  
R/G*

**FPSC CLAUSES AUDITS  
ADEQUATE SUPPORTING DOCUMENTATION  
AR #7, Item #5**

Cash Vouchers

1. Vendors invoice
2. Purchase order
3. Contract with vendor, if applicable
4. Time sheets, etc. for contract labor
5. Explain how items on invoice relate to clause i.e., how are they used to support clause activity.

**CONFIDENTIAL**

The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

- 1 • The invoice in question <sup>116-29</sup> [redacted] is from [redacted] <sup>B</sup> who was contracted to remove broken mirrors & tubes and replace them with new ones. This work is related to the clause because it involves routine maintenance activities in support of the Martin solar facility.
  - A copy of the purchase order and the invoice are attached above.
6. If invoice is allocated between or among programs, indicate allocation percentage and rationale for allocation.
7. If it is advertising, provide the ads.

*Did not maintain supporting documentation in work papers.  
NA*



MLC  
4/3/18

AR#7  
Project#39  
Item #6

16-29.6.1

**From:** Vantuinen, Lorie  
**Sent:** Monday, March 19, 2018 2:54 PM  
**To:** Moncrief, Gary; Nieb, John  
**Cc:** Nieb, John  
**Subject:** AUDIT QUESTION

The

1) [REDACTED] DEBIT original accrual was pulled in the audit of ECRC transactions. I have the document copy, but when I looked in March to see if it had been paid, it doesn't look like it was paid or re-accrued. Line item #11 on the journal entry.

1) We will need to know how this work supported the clause, copy of invoice if paid, etc. Same drill that Mary has been asking for the other samples. This might have been paid the following month by a different IO.

Order	CO object name	BusA	Cost El	Cost element name	Val in rep. cur.	Doc. Date	Name	Per	Year	P	Pur	Offset
2	G00000129151		A08	5750700	Out-Serv-Othr	[REDACTED]	02/28/2017	2000219431	[REDACTED]	2	2017	Accr L
3	G00000129151		A08		Out-Serv-Othr	[REDACTED]	02/28/2017	2000219431	[REDACTED]	3	2017	Accr L
			5750	Out-Serv-Othr	0.00							
					0.00							

Florida Power & Light Company  
Environmental Cost Recovery Clause  
Test Year Ended: December 2017  
No.: 20180007-EI; ACN No: 2018-036-4.1  
Description: PROJECT 26

CONFIDENTIAL



SOURCE



*NG  
4/3/18  
RD*

**FPSC CLAUSES AUDITS  
ADEQUATE SUPPORTING DOCUMENTATION  
AR #7; Project #39; Items #7, #8, & #9**

Payroll

1. Employee's job description and how that job relates to clause and how it supports clause programs.

The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred. The hours in question were in support of the Martin solar facility.

1. [REDACTED]<sup>A</sup> - These overtime hours were worked in support of the main HTF pump removal and installation. This work is related to the clause because it involves routine maintenance activities in support of the Martin solar facility.
  2. Time record - See attached. Hours charged: 114 hours at hourly rate of [REDACTED].<sup>A</sup>
  3. There was also payroll taxes related to this work [REDACTED].<sup>A</sup>
    - Direct charge
2. Copy of time record for selected employee for period selected, including hours charged to clause programs and pay rate.
  3. Was payroll a direct charge or a fixed allocation? If a fixed allocation, please provide the basis for the allocation.

**CONFIDENTIAL**



*41318 MG*

**FPSC CLAUSES AUDITS  
ADEQUATE SUPPORTING DOCUMENTATION  
AR #7; Project #39; Items #10 & #11**

Payroll

1. Employee's job description and how that job relates to clause and how it supports clause programs.

The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred. The hours in question were in support of the Martin solar facility.

Item #10

- 1 • [REDACTED]<sup>A</sup> - Itinerant, Maint. Tech I&C. These hours were worked in support of the main HTF pump removal and installation.
- 2 • Time record - attached above - (19 hours charged at [REDACTED]<sup>A</sup> hourly rate)
- Direct charge

Item #11

- 3 • [REDACTED]<sup>A</sup> - Special Itinerant, Mechanic [REDACTED]<sup>B</sup> hourly rate). These hours were worked in support of the main HTF pump removal and installation.
  - Time record - See attached
  - Direct charge
2. Copy of time record for selected employee for period selected, including hours charged to clause programs and pay rate.
3. Was payroll a direct charge or a fixed allocation? If a fixed allocation, please provide the basis for the allocation.

*\* Audit staff reviewed timesheets.  
Did not maintain in work papers MA.*

**CONFIDENTIAL**

Description: *Project 39 same*

*MG  
4/6/18  
AL*

**FPSC CLAUSES AUDITS  
ADEQUATE SUPPORTING DOCUMENTATION  
AR #7, Project #39; Items #12 to #18**

Cash Vouchers

1. Vendors invoice
2. Purchase order
3. Contract with vendor, if applicable
4. Time sheets, etc. for contract labor
5. Explain how items on invoice relate to clause i.e., how are they used to support clause activity.

**CONFIDENTIAL**

The Martin Solar Project is approved by the Public Service Commission under the Environmental Cost Recovery Clause (ECRC) for cost recovery of all reasonable and prudent costs incurred. All of the charges in question are clause related because they were in support of the Martin Solar Facility. Specifically, they all supported a capital project to install an additional 40 FT of 8" piping with isolation valves at the header of each HRSG on Martin Units 8A,B,C,D for the Solar Thermal system. This project was a fleet request to enable isolation of a Solar train while keeping the HRSGs online.

- 1 Item #12: [REDACTED]<sup>A</sup> - contracted to install two (2) 8" isolation valves and pipe modifications.
  - 2 Items #13, #14, and #15: [REDACTED]<sup>A</sup> - payroll for non-FPL Central Maintenance
  - 3 Contract Coordinator [REDACTED]<sup>A</sup> to oversee contractors working on above project.
  - 4 Item #16: [REDACTED]<sup>A</sup> - contracted to perform Non-Destructive Examination inspection services on two (2) solar isolation valves and piping modifications.
  - 5 Item #17: [REDACTED]<sup>A</sup> - contracted to provide scaffolding and insulation work for the installation of solar isolation valves and pipe modifications for the above project.
- Item #18: Supv, Engineering & Capital Support - engineering overheads related to the above project.
6. If invoice is allocated between or among programs, indicate allocation percentage and rationale for allocation.
  7. If it is advertising, provide the ads.

*\* Audit staff maintained selected workpapers. MG.*

4/21/17  
R

Layout ECRC ECRC  Active  
Order GPMR10015630 Install (2) 8" Isolation Valve  
Report currency USD US Dollar

16-29.9.1

Order	CO object name	BusA	Cost Elem.	Cost element name	Val. in rep. cur.	Document Date	Name	Partner
GPMR10015630	Instal (2) 8" Isolation Valves and	A08	5750320	Out Serv-Construct	<del>16-29</del>	02/24/2017	MARTIN 163170 022317 02/23/17 - 02/23/17	

16-29

CONFIDENTIAL

Florida Forest & Light Company  
Environmental Cost Recovery Clause  
Test Year Ended: December 2017  
Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1

Description: Project 3A sample



SOURCE

Florida Power & Light Company  
 Environmental Cost Recovery Clause  
 Test Year Ended: December 2017  
 Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1  
 Description: **Project SA Sample**

*Handwritten:* 2/25/18  
 2

G/L Account: 5750550  
 Company Code: 1500  
 FLORIDA POWER & LIGHT CO  
 Contractor: Straight Time Labor

Doc. no. 5402001791

Line Item 1 / Costs / 81

Amount: [Redacted] USD

Tax code: [Redacted]

Tax Jur: [Redacted]

Additional Account Assignments

Cost Center		Order	GPMR10015631
Sales Order	0	Network	
WBS Element			
Quantity	1		More
Assignment	20170206		
Text	02052017-74-NET500130728		Long text

**CONFIDENTIAL**

*Handwritten:* SA #  
 01  
 P#C

SOURCE

16-29-9.2

MKS  
4/16/14

#14

16-29.9.3

Display Document: Line Item 003

Additional Data

G/L Account: 5750560  OUTSIDE SERVICES: Contractor Other Labor

Company Code: 1500 FLORIDA POWER & LIGHT CO

Doc. no. 5402001791

Line Item 3 / Costs / 81

1 Amount: [redacted] USD  
Tax code: 16-29  
Tax Jur.:

Additional Account Assignments

Cost Center: Order: GPMR10015633

Sales Order: 0 0

WBS Element: Network:

Quantity: 1 AU

Assignment: 20170206

2 Text: [redacted] 02052017-74-NEETS00130728

Florida Power & Light Company  
Environmental Cost Recovery Clause  
Test Year Endet: December 2017  
Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1  
Description: P.D. 16-29 SA SAMPLE

CONFIDENTIAL



SOURCE

Florida Power & Light Company  
 Environmental Cost Recovery  
 Test Year Ended: December 2017  
 Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1  
 Description: **Product 39 sample**

*Handwritten:* 16-29  
 22

G/L Account		5750570		Additional Data	
Company Code		1500		FLORIDA POWER & LIGHT CO	
Line Item 1 / Costs / 81				Doc. no.: 5402001817	
Amount		[Redacted]		USD	
Tax code		16-29			
Tax Jur.					
Additional Account Assignments					
Cost Center				Order	
Sales Order		0		GPMR10015633	
M/S Element				Network	
Quantity		1		AV	
Assignment		20170206			
Text		02042017-940-NEEES00033015		More	
				Long text	

**CONFIDENTIAL**

#15



SOURCE

16-299.4

MS  
4/19/18

Layout	ECRC	ECRC	<input checked="" type="checkbox"/> Active
Order	GPMR10015630	Install (2) 8" Isolation Valve	
Report currency	USD	US Dollar	

Order	CO object name	BusA	Cost Elem	Cost element name	Val in rep. cur.	Document Date	Name
1	GPMR10015630	Instal (2) 8" Isolation Valves and	A08	5750600	Out Serv-Samp&Test	02/16/2017	02/16/17 - 02/16/17

\*16-29

110-79.9.5

Florida Power & Light Company  
 Environmental Cost Recovery Clause  
 Test Year Ended: December 2017  
 Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1  
 Description: *pretest SA sample*

CONFIDENTIAL

91#



SOURCE



Description: **Project 39 Sample**

*Handwritten:* 11/11/17

G/L Account: 5751000  
Company Code: 1500 FLORIDA POWER & LIGHT CO  
Additional Data:  JTSIDE SVCS: Building Services

Doc. no.: 5402004765

Line Item 17 / Costs / 81

Amount: [REDACTED] USD

Tax Code: 110-29

Tax Jur.:

Additional Account Assignments

Cost Center:

Sales Order: 0

WBS Element:

Quantity: 1

Assignment: 20170208

Text: Material, equip, lodging 01/01/17 - 01/2

Order: GPMR10015633

Network

More

Long text

**CONFIDENTIAL**

*Handwritten:* #17



SOURCE

110-79.9.10

Florida Power & Light Company  
 Environmental Cost Recovery Clause  
 Test Year Ended: December 2017  
 Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1  
 Description: *Project 39 sample*


*4/15/18*

Cost Element	Cost element name	Val'n rep	Total quantity	PUM	Offsetting acct	Name of offsetting account
5400102	M&S-PG/NU Stores OH		21	FT	M: 2305000	Inv. M & S (ECC-6)
5993000	PP-Supv Eng&Cap Sup				S: 3332000	I/F Crq-Over 999

*1*  
*2*  
*14-29*

CONFIDENTIAL

*#18*

SOURCE 

11-29-97

MB  
4/16/18  
AD

**McAlice, Mary**

**Subject:** FW: AUDIT REQUEST - ECRC SUPPORT  
**Attachments:** 20180319183230227.pdf

16-29 11.1

Order	CO object name	BusA	Cost El	Cost element name	Val:rep.cdr	Doc. Date	Name	Per. Year/P	Purch.Doc	Offset. acct name	RefDocNo	Name of offsetting acc
G00000126626	PMN DIGITAL CNTL SYS(DCS)UPGRADE	A08	5750700	Out Serv-Othr		02/15/2017		2017	2000192086	GR/IR Clearing	S003251095	GOODS RECEIPT INVC
			5750	Out Serv-Othr								

16-29

Apply Clear

Last Refresh: 03/19/2018 14:55:18 EST Refresh Stop Transaction

View: Standard View Display Print Preview Refresh Export

Confirmation Number	Confirmation Name	Status	Specification	Reference Document	Created by	Posting Date	Created On
5202717965		Posted in the Backend	Goods/Services Confirmation	9065894		12/27/2017	12/27/2017
5202717964		Posted in the Backend	Confirmation of Cancellation	ASIMON 053017		12/27/2017	12/27/2017
5202475475		Posted in the Backend	Goods/Services Confirmation	ASIMON 053017		05/30/2017	05/30/2017
5202432236		Posted in the Backend	Goods/Services Confirmation	9064977		04/24/2017	04/24/2017
5202432234		Posted in the Backend	Confirmation of Cancellation	MILESTONE ASIMON		04/24/2017	04/24/2017
5202429172		Posted in the Backend	Goods/Services Confirmation	MILESTONE ASIMON		04/21/2017	04/21/2017
5202350211		Posted in the Backend	Goods/Services Confirmation	9063890		02/15/2017	02/15/2017
5202329228		Posted in the backend	Goods/Services Confirmation	9063594		01/25/2017	01/25/2017

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Details for Selected Item

Item Data Account Assignment

You can see who bears the costs and, if necessary, you can distribute the cost to several cost centres

Number	A	Quantity	Account Assignment Category	Account Assignment Number	Account Assignment Description	General Ledger Account	General Ledger Description
0001			Order	G00000126524	PMGEA.B.C.D DIGITAL CNTL SYS(DCS)UP	5750700	Out Serv-Othr
0002			Order	G00000126626	PMN DIGITAL CNTL SYS(DCS)UPGRADE	5750700	Out Serv-Othr

Florida Power & Light Company  
 Environmental Cost Recovery Clause  
 Year Ended: December 2017  
 Dkt. No.: 20180007-EE; ACN No: 2018-036-4-1  
 Description: Project 39 sample

PBC  
SOURCE

Description: **Project 45 Sample**

**Project #45**

**MB**  
**4/16/18**  
**AR**

**FPSC CLAUSES AUDITS  
ADEQUATE SUPPORTING DOCUMENTATION  
AR #7 Items #1 & 2**

**Cash Vouchers**

1. Vendors invoice
2. Purchase order
3. Contract with vendor, if applicable
4. Time sheets, etc. for contract labor
5. Explain how items on invoice relate to clause i.e., how are they used to support clause activity. The Martin electrostatic precipitator (ESP) project and the Martin Solar project are both approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

The items listed below are clause related because they involve routine maintenance activities in support of the Martin ESP's.

**ESP items:**

- 1 • 1) [redacted] was contracted to provide and replace six ESP Ash discharge valves (3 valves on unit 1 and 3 valves on unit 2). The item in question is for the three valves on unit 1 [redacted]. The invoice attached above is for all six valves.
- 2 11-29 2) Overtime for the FPL contractor coordinator in support of the replacement of
- 3 the ash discharge valves [redacted] 11-30
6. If invoice is allocated between or among programs, indicate allocation percentage and rationale for allocation.
7. If it is advertising, provide the ads.

**\* Audit staff reviewed supporting documentation and did not maintain**

**CONFIDENTIAL**

**in workpapers. MR**



# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Workpapers  
**AUDIT:** FPL, Environmental Audit  
**AUDIT CONTROL NO:** 2018-036-4-1  
**DOCKET NO:** 20180007-EI  
**DATE:** June 20, 2018

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
16-28.1	Plant Project Samples	1	N			
16-28.2	Plant Project Samples	1	Y	Col. A	(d)	L. Fuca
16-28.3	Plant Project Samples	1	N			
16-28.4	Plant Project Samples	1	N			
16-28.5	Plant Project Samples	1	N			
16-28.6	Plant Project Samples	1	N			
16-28.7	Plant Project Samples	1	N			
16-28.8	Plant Project Samples	1	N			
16-28.9	Plant Project Samples	1	N			
16-28.10	Plant Project Samples	1	N			
16-28.11	Plant Project Samples	1	N			
16-29.1	Plant Project Samples	1	Y	Line 1A	(d)	C. Arcari
16-29.2	Plant Project Samples	1	Y	Lns. 1A and 2A	(d)	C. Arcari
16-29.3	Plant Project Samples	1	Y	Line 1A, B	(d)	C. Arcari
16-29.4	Plant Project Samples	1	N			
16-29.4.1	Plant Project Samples	1	Y	Col. A	(d)	C. Arcari
16-29.4.2	Plant Project Samples	1	Y	Col. A	(d)	C. Arcari
16-29.5	Plant Project Samples	1	Y	Line 1A, B	(d)	C. Arcari
16-29.6	Plant Project Samples	1	N			
16-29.6.1	Plant Project Samples	1	Y	Lns. 1A, 2B, 2C, 3B and 3C	(d)	C. Arcari
16-29.7	Plant Project Samples	1	Y	Lns. 1A, 2A and 3A	(d)	C. Arcari
16-29.7.1	Plant Project Samples	1	N			
16-29.8	Plant Project Samples	1	Y	Lns. 1A, 2A, 3A and 3B	(d)	C. Arcari
16-29.8.1	Plant Project Samples	1	N			
16-29.8.2	Plant Project Samples	1	N			
16-29.9	Plant Project Samples	1	Y	Lns. 1A, 2A, 3A, 4A and 5A	(d)	C. Arcari
16-29.9.1	Plant Project Samples	1	Y	Col. A	(d)	C. Arcari
16-29.9.2	Plant Project Samples	1	Y	Lns. 1A and 2A	(d)	C. Arcari
16-29.9.3	Plant Project Samples	1	Y	Lns. 1A and 2A	(d)	C. Arcari
16-29.9.4	Plant Project Samples	1	Y	Lns. 1A and 2A	(d)	C. Arcari

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
16-29.9.5	Plant Project Samples	1	Y	Line 1A, B	(d)	C. Arcari
16-29.9.6	Plant Project Samples	1	Y	Line 1A	(d)	C. Arcari
16-29.9.7	Plant Project Samples	1	Y	Col. A, Lns. 1-2	(d)	C. Arcari
16-29.10	Plant Project Samples	1	N			
16-29.10.1	Plant Project Samples	1	N			
16-29.11	Plant Project Samples	1	N			
16-29.11.1	Plant Project Samples	1	Y	Col. A Line 1B Cols. C-E	(d)	C. Arcari
16-30.1	Plant Project Samples	1	Y	Lns. 1A, 2A and 3A	(d)	C. Arcari

**EXHIBIT D**

**DECLARATIONS**



**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental Cost Recovery Clause

Docket No: 20180007-EI

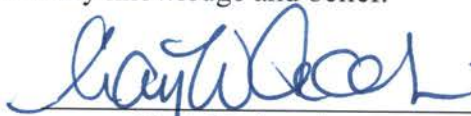
**DECLARATION OF CRAIG W. ARCARI**

1. My name is Craig W. Arcari. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Power Generation, FPL Operations. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C, and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information Obtained in Connection with Audit No. 2018-036-4-1 for which I am designated as the declarant. The documents or materials that I have reviewed, and which are asserted by FPL to be proprietary confidential business information contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms in the future, and would impair the competitive interests of the goods provider. Specifically, the information provided by FPL contains negotiated pricing information for solar projects. In addition, some documents 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. 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 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.

  
\_\_\_\_\_  
Craig W. Arcari

Date: 6/18/2018

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental Cost Recovery Clause

Docket No: 20180007-EI

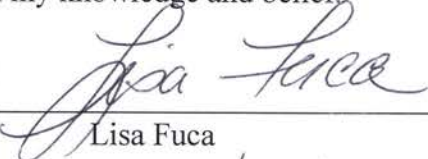
**DECLARATION OF LISA FUCA**

1. My name is Lisa Fuca. I am currently employed by Florida Power & Light Company ("FPL") as Principal Business Analyst, Nuclear Business Operations. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C, and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information Obtained in Connection with Audit No. 2018-036-4-1 for which I am designated as the declarant. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information concerning bids and/or contractual data, the disclosure of which would impair the efforts of FPL and its vendors to contract for goods and services on favorable terms. Specifically, the information relates to pricing for monitoring and reporting work provided at the Turkey Point nuclear site. 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 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.

  
\_\_\_\_\_  
Lisa Fuca

Date: 6/18/18