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January 27, 2012

VIA HAND DELIVERY

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

___ claim of confidentiality
 ___ notice of intent
X request for confidentiality
 ___ filed by OPC

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 authorized to view this DN.-CLK

RECEIVED FPSC
 12 JAN 27 PM 4:07
 COMMISSION
 CLERK

Re: Docket No. 060224-EI
 Request for Confidential Classification (Audit No. 05-285-4-1)

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") are an original and seven (7) copies of FPL's Third Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 05-285-4-1. The original includes Revised Exhibits A and B (two copies), along with Third Revised Exhibit C. Third Revised Exhibit D will be filed under separate cover. The seven copies do not include copies of the Exhibits.

Revised Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Revised Exhibit B is an edited version of Revised Exhibit A, in which the information FPL asserts is confidential has been redacted. Third Revised Exhibit C consists of a justification table in support of FPL's Request for Confidential Classification. Also included in this filing is a compact disc containing FPL's Third Request for Extension of Confidential Classification and Third Revised Exhibit C only, in Microsoft Word format.

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

Sincerely,

Maria J. Moncada
 Attorney for
 Florida Power & Light Company

COM
 APA 5 + 1 CD
 ECR
 GCL 1
 RAD
 SRC Enclosures
 ADM cc: party of record, w/out exhibits
 OPC
 CLK 1 Florida Power & Light Company

700 Universe Boulevard, Juno Beach, FL 33408

DOCUMENT NUMBER - DATE
00571 JAN 27 2012
 FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Second Request for Extension of
Confidential Classification of Materials
Provided in FPL Connect Service Audit

Docket No. 060224-EI

Filed: January 27, 2012

**FLORIDA POWER & LIGHT COMPANY'S THIRD
REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION
OF MATERIALS PROVIDED IN THE FPL CONNECT SERVICE AUDIT**

Pursuant to Section 366.093, Florida Statutes (2011) ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code (2011) ("Rule 25-22.006"), 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. 05-285-4-1 ("the Audit"). In support of this request, FPL states as follows:

1. On May 12, 2006 FPL filed its Amended Request for Confidential Classification of certain materials obtained during the Audit, which included Revised Exhibits A through E. On November 2, 2006 FPL filed an Amended Exhibit C to its May 12, 2006 Request. FPL adopts and incorporates by reference its May 12, 2006 Request and exhibits.

2. On May 16, 2008, FPL filed its First Request for Extension of Confidential Classification of certain materials obtained during the Audit, which incorporated by reference the previously filed Exhibits A, B, D, E and Amended Exhibit C. FPL adopts and incorporates by reference its May 16, 2008 Request and exhibits.

3. By Order No. PSC-08-0515-CFO-EI, dated August 12, 2008 the Commission granted FPL's May 16, 2008 Request.

4. On March 15, 2010, FPL filed its Second Request for Extension of Confidential Classification, and on May 28, 2010 filed its Revised Second Request for Confidential

Classification. FPL adopts and incorporates by reference its March 15, 2010 and May 28, 2010 Requests and exhibits.

5. By Order No. PSC-10-0477-CFO-EI, dated July 28, 2010, the Commission granted FPL's March 15, 2010 and May 28, 2010 Requests.

6. The period of confidential treatment granted by Order No. PSC-10-0477-CFO-EI will soon expire. Some of the information that was the subject of FPL's March 15, 2010 and May 28, 2010 Requests warrants continued treatment as proprietary and confidential business information within the meaning of section 366.093(3), Florida Statutes. Accordingly, FPL hereby submits its Third Request for Extension of Confidential Classification.

7. Included herewith and made a part hereof are Revised Exhibits A and B together with Third Revised Exhibit C to reduce the amount of information for which confidential treatment is sought. FPL has also prepared a Third Revised Exhibit D, which consists of the affidavit of Maria Besada in support of this request for continued confidential treatment. To avoid delay, FPL will submit the affidavit under separate cover immediately upon execution.

8. FPL submits that the information identified in Third Revised Exhibit C continues to be proprietary confidential business information within the meaning of section 366.093(3), Florida Statutes. Pursuant to section 366.093, such materials are entitled to confidential treatment and are 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.

9. Some of the information that FPL asserts is proprietary and confidential contains cost allocation models and transaction records for FPLES. The documents or materials contain

or constitute trade secrets and information relating to competitive interests, the disclosure of which could impair the competitive business of FPLES, and with respect to certain information.¹

This information is protected by Section 366.093(3)(a) and (e).

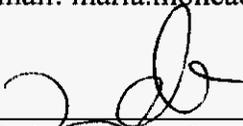
10. FPL requests that this information be accorded continued confidential classification for an additional 18-month period. FPL further requests that the information be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and forgoing reasons, as more fully set forth in the supporting materials and incorporated herein by reference, and the affidavit to be filed under separate cover, Florida Power & Light Company respectfully requests that its Third Request for Extension of Confidential Classification be granted.

Respectfully submitted,

Maria J. Moncada, Principal 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: _____



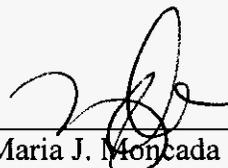
Maria J. Moncada
Fla. Bar No. 0773301

¹ Maria Besada's affidavit, to be filed under separate cover, supports paragraph 9.

CERTIFICATE OF SERVICE
Docket No. 060224-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Third Request for Extension of Confidential Classification* has been furnished by hand delivery (**) or the United States Mail this 27th day of January, 2012 to the following:

Richard Bellak
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

By: 

Maria J. Moncada
Florida Bar No. 0773301

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

THIRD REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Work Papers
AUDIT: FPL Connect Service Audit
AUDIT CONTROL NO: 05-285-4-1
DOCKET NO. 060224- EI

Work paper No.	Description	Conf. Y/N	No. of Pages	Line No. Column No.	Florida Statute 366.093(3) Subsection	Affiant
N/A	Workpaper Index	N	1	N/A	N/A	N/A
1	Audit Report	N	1	N/A	N/A	N/A
		N	2	N/A	N/A	N/A
		N	3	N/A	N/A	N/A
		N	4	N/A	N/A	N/A
		Y	5	Line 26	N/A	N/A
		N	6	N/A	N/A	N/A
		N	7	N/A	N/A	N/A
		Y	8	Line 3	(e)	Maria Besada
1	Audit Report Annotated	N	1	N/A	N/A	N/A
		N	2	N/A	N/A	N/A
		N	3	N/A	N/A	N/A
		N	4	N/A	N/A	N/A
		Y	5	Line 26	(a); (e)	Maria Besada
		N	6	N/A	N/A	N/A
		N	7	N/A	N/A	N/A
		Y	8	Lines 3	(e)	Maria Besada
5A	Notes from meeting on explanation the FPL Service Connect Process	N	1 – 2	N/A	N/A	N/A
5B	Meeting on clarification of the cost allocation worksheets provided	N	1	N/A	N/A	N/A
		N	2	N/A	N/A	N/A
25	Notes of observation of FPLES representative	N	1	N/A	N/A	N/A
		N	2	N/A	N/A	N/A
		Y	3	Line 5	(e)	Maria Besada
		N	4	N/A	N/A	N/A
		N	5	N/A	N/A	N/A
		N	6	N/A	N/A	N/A
		N	7	N/A	N/A	N/A
25-1	Audit Finding #3	N	1-2	N/A	N/A	N/A
25A	Print Screen of Vapors	Y	1	Lines 2 – 20, EXCEPT CONNECT SERVICE PARTNERS NAMED ON LINES 12 - 18	(a); (e)	Maria Besada
28	Summary of FPL representative training	N	1	N/A	N/A	N/A
		N	2	N/A	N/A	N/A
29	Script used by FPLES to offer services	N	1 – 15	N/A	N/A	N/A
29-1	Audit finding #1	N	1	N/A	N/A	N/A
42-1	FPLES description of services	N	1	N/A	N/A	N/A
42-2	FPLES connect service providers	N	1	N/A	N/A	N/A
42-3	Explanation of FPLES Connect Services	Y	1	Lines 20-21	(a); (e)	Maria Besada
42-4	Cost Allocation question	N	1	N/A	N/A	N/A
42-5	Commission received from FPLES	N	1	N/A	N/A	N/A
42-7	Types of calls transferred	Y	1	Line 13	(a); (e)	Maria Besada
42-8	Customer information transferred	N	1	N/A	N/A	N/A
42-10	Training provided to FPLES representatives	N	1	N/A	N/A	N/A
43	Summary of Cost Allocation and Audit Findings	Y	1	Lines 8-22, 24-25, 27-28	(e)	Maria Besada
		Y	2	Line 25	(a); (e)	Maria Besada
		N	3	N/A	N/A	N/A
		N	4	N/A	N/A	N/A
		Y	5	Line 3	(e)	Maria Besada
		Y	6	N/A	N/A	N/A
43-1	Cost Allocation	Y	1	Lines 18-19, 21, 24, 32	(a); (e)	Maria Besada

Work paper No.	Description	Conf. Y/N	No. of Pages	Line No. Column No.	Florida Statute 366.093(3) Subsection	Affiant
		Y	2	Lines 33-35, Col. H	(e)	Maria Besada
		N	3	N/A	N/A	N/A
		Y	4	Lines 2-10, 12-19, 22-31, 34-35	(a); (e)	Maria Besada
		Y	5	Lines 5, 18, 31, 44, 57	(e)	Maria Besada
		Y	6	Lines 12, 25	(e)	Maria Besada
		N	7	N/A	N/A	N/A
		N	8	N/A	N/A	N/A
		Y	9	Lines 33-35	(e)	Maria Besada
		N	10	N/A	N/A	N/A
		Y	11	Lines 32-34	(e)	Maria Besada
		N	12	N/A	N/A	N/A
43-2	Cost Allocation	N	1-21	N/A	N/A	N/A
43-2A	Observation of FPL representative-notes	N	1-3	N/A	N/A	N/A
43-3	Cost Allocation Manual	N	1-4	N/A	N/A	N/A
44 p.2	Bill Insert	Y	1	Line 20	(e)	Maria Besada
44-17	Bill Insert Cost	Y	1	Lines 1-33, 35-37	(a); (e)	Maria Besada
44-19	Bill insert information	Y	1	Lines 18, 20	(e)	Maria Besada
		Y	2	Lines 8-9	(e)	Maria Besada
44-20	Policy on bill inserts	N	1-2	N/A	N/A	N/A
44-21	Bill stuffers information	Y	1	Lines 18-23	(e)	Maria Besada
44-23	Cost related to bill inserts	N	1	N/A	N/A	N/A
44-24	FPL Revenue	Y	1	Lines 7, 11, 16-21	(e)	Maria Besada
		Y	2	Lines 13-15 Col. N, Lines 17-23 Cols. S & T	(e)	Maria Besada
		N	3	N/A	N/A	N/A
		Y	4	Lines 17, 27, Col. N	(e)	Maria Besada
		Y	5	Line 17, Col. N	(e)	Maria Besada
		N	6	N/A	N/A	N/A
45	FPL Group Code of Conduct	N	1-20	N/A	N/A	N/A
46	Total revenue received by FPLES related to service connect calls	Y	1	Lines 19, 21	(e)	Maria Besada
46-1A	Web shot display	N	1-2	N/A	N/A	N/A
46-1	Gas service revenues	Y	1	Lines 15 - 22, Col. C	(e)	Maria Besada
		Y	2-3	All	(e)	Maria Besada
		N	4	N/A	N/A	N/A
		Y	5	Lines 15-21, Col. C	(e)	Maria Besada
		Y	6-7	All	(e)	Maria Besada
		N	8	N/A	N/A	N/A
46-2	Cash receipts received on behalf of FPLES	Y	1	Lines 15 - 19, Col. C	(a); (e)	Maria Besada
		N	2-3	N/A	N/A	N/A
		Y	4	Lines, 5, 11, 17, 22, 28, Col. B, Lines 5 - 33, Cols. D - F	(e)	Maria Besada
		Y	5	Lines 5, 11, 16, 24, 29, Col. B, Lines 5 - 34, Col. D - F	(e)	Maria Besada
		Y	6	Lines 5, 10, 16, Col. B, Lines 5 - 22, Cols. D - F	(e)	Maria Besada
		Y	7	Lines 5, 10, 16, 21, 26, 34, Col. B, Lines 5 - 34, Cols. D - F	(e)	Maria Besada
		Y	8	Lines 9, 14, 19, 25, 31, Col. B, Lines 5 - 32, Cols. D - F	(e)	Maria Besada
		Y	9	Lines 8, 13, 18, 23, 28, 33, Col. B, Lines 5 - 33, Cols. D - F	(e)	Maria Besada
		Y	10	Lines 9, 17, 22, 28, 34, Col. B, Lines 5 - 34, Cols. D - G	(e)	Maria Besada
		Y	11	Lines 10, 15, 20, 25, 30, Col. B, Lines 5 - 33, Cols. D - F	(e)	Maria Besada
		Y	12	Lines 7, 14, 20, 25, 34, Col. B, Lines 5 - 34, Cols. D - F	(e)	Maria Besada
		Y	13	Lines, 9, 14, 19, 27, 33, Col. B, Lines 5 - 33, Col. D-F	(e)	Maria Besada
		Y	14	Lines 9, 17, 22, 30, Col. B, Lines 5 - 35, Cols. D - G	(e)	Maria Besada
		Y	15	Lines 5, 11, 17, 22, 27, Col. B,	(e)	Maria Besada

Work paper No.	Description	Conf. Y/N	No. of Pages	Line No. Column No.	Florida Statute 366.093(3) Subsection	Affiant
		Y	16	Lines 5 - 34, Col. D - G	(e)	Maria Besada
		Y	17	Lines 6, 11, 17, 23, 29, Col. B, Lines 5 - 32, Cols. D - F	(e)	Maria Besada
		Y	18	Lines 6, 11, 18, 23, 28, 33, Col. B, Lines 5 - 33, Cols. D - F	(e)	Maria Besada
		Y	19	Lines 9, 14, 19, 24, 29, Col. B, Lines 5 - 34, Cols. D - F	(e)	Maria Besada
		N	20	Lines 31, 36, Col. B, Lines 5 - 43, Cols. D - G	(e)	Maria Besada
		N	20	N/A	N/A	N/A
46-3	Transfer cash collected at FPL for VAPS to inter-company payable account to FPLES	Y	1	Lines 16 - 25, Col. C	(e)	Maria Besada
		Y	2	Lines 5 - 7, 12, Cols. D - E & Lines 8-21, Col. B	(e)	Maria Besada
		Y	3	Lines 5 - 8, Cols. C & D	(e)	Maria Besada
		Y	4	Lines 4 - 11, Cols. B & E	(e)	Maria Besada
		Y	5	Lines 4 - 7, Cols. B - F & Lines 9 - 12, Col. F & Line 14, Col. D	(e)	Maria Besada
		Y	6	Lines 4 - 9, Cols. B - H & Lines 11 - 16, Col. H	(e)	Maria Besada
		Y	7	Lines 15 - 18, Col. C	(a); (e)	Maria Besada
		Y	8	Lines 6 - 8, Col. B & Lines 19 - 21, Line 23, Col. A & Lines 25 - 26, Col. C	(a); (e)	Maria Besada
		Y	9	Lines 9 - 12.5, Cols. A - E, G, H	(a); (e)	Maria Besada
46-4	Journal entry to true-up bad debt provision for the in-territory portion of natural gas	Y	1	Lines 15 - 17, Col. C	(e)	Maria Besada
		Y	2-4	All	(e)	Maria Besada
		Y	5	Line 29, Col. B	(e)	Maria Besada
		Y	6	Lines 11 - 12 & Lines 16 - 18, Col. B	(e)	Maria Besada
		N	7	N/A	N/A	N/A
		Y	8	Line 6, Col. B & Line 8, Col. D & Line 10, Col. F & Lines 19 - 22, 24 & Lines 31 - 32 & Line 33, Col. I	(e)	Maria Besada
Y	9	Lines 8 - 9, Col. G & Line 18, Cols. L & N, Lines 19 - 20	(e)	Maria Besada		
47-1	General Ledger Monthly Transaction 12/04	N	1-4	N/A	N/A	N/A
		Y	5	Lines 14-18, Col. B	(e)	Maria Besada
		N	6	N/A	N/A	N/A
47-2	General Ledger Monthly Transaction 12/04	Y	1	Lines 7-9, Cols. D-E	(e)	Maria Besada
		Y	2	Lines 14-19, Cols. B	(e)	Maria Besada
		Y	3	Lines 7-11, Cols. D-E	(e)	Maria Besada
		N	4	N/A	N/A	N/A
		Y	5	Lines 14-21, Col. B	(e)	Maria Besada
49	Web site information	N	1-17	N/A	N/A	N/A