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December 4, 2013

**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  
13 DEC -4 PM 1:34  
COMMISSION CLERK  
1:34 [Signature]

**Re: Docket No. 130223-EI**

Dear Ms. Stauffer:

I enclose for filing in the above docket an original and seven (7) copies of Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Responses to Staff's Second Data Request No. 1. The original includes Exhibits A, B (two copies), C and D. The seven copies do not include copies of the Exhibits.

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 one affidavit in support of FPL's Request for Confidential Classification. Also included in this filing is a compact disc containing FPL's Request for Confidential Classification and Exhibit C, in Microsoft Word format.

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

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO 5+LCD + 1 copy of Exhibit B Redacted Copies
- ENG \_\_\_\_\_
- GCL 1
- IDM 1
- TEL \_\_\_\_\_
- CLK \_\_\_\_\_

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

Sincerely,  
  
Kenneth M. Rubin

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Approval of            )  
Optional Non-standard Meter Rider    )

Docket No. 130223-EI  
Filed: December 4, 2013

**FLORIDA POWER & LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
OF RESPONSES TO STAFF'S SECOND DATA REQUEST NO. 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 portions of its responses to Staff's Second Data Request No. 1 ("the responses").

In support of its request, FPL states:

1. On November 13, 2013, FPL filed a Notice of Intent to Request Confidential Classification of the responses. Pursuant to Rule 25-22.006(3)(a)1, FPL is required to file a Request for Confidential Classification for the confidential information within 21 days. Accordingly, FPL files this Request for Confidential Classification to maintain continued confidential handling of the confidential responses.

2. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of 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 that identifies the specific page and line references to the confidential materials for which FPL seeks confidential treatment. The table also references the specific statutory bases for confidentiality and the affiant who supports the requested classification.

d. Exhibit D consists of the affidavit of Ian Robson.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3). 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 the affidavit included in Exhibit D indicates, certain documents provided by FPL contain proprietary confidential business information related to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Section 366.093(3)(e), Fla. Stat.

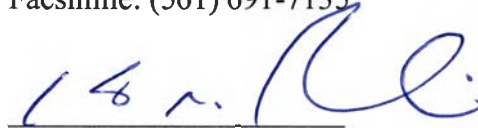
5. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat. (2012).

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

Respectfully submitted,

Kenneth M. Rubin  
Senior Counsel  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 691-2512  
Facsimile: (561) 691-7135

By:



Kenneth M. Rubin  
Fla. Bar No. 349038

**CERTIFICATE OF SERVICE  
DOCKET NO. 130223-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification without exhibits\* was served by hand delivery\*\* or U.S. Mail this 4<sup>th</sup> day of December, 2013 to the following:

Michael Lawson, Esq.\*\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

J. R. Kelly, Esq.  
Patricia A. Christensen, Esq.  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399

By: 

Kenneth M. Rubin  
Fla. Bar No. 349038

\*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**

**QUESTION**

For the questions 1-5, please refer to the Petition for Approval of Optional Non-Standard Meter Rider, Exhibit B, page 4 of 15, lines 1-8.

Does FPL intend to outsource changes to the Information System that are needed to implement the non-standard meter tariff?

- a) If yes, please state which portions of the Information System will be amended and provide support for the estimated expense amounts shown in Exhibit B. Support should include a written estimate that identifies the provider.
- b) If no, please state which portions of the Information System will be amended by in-house staff. Please provide the written estimate of the in-house expense for updating/enhancing the Information System. The estimate should provide specificity to include the staff, tasks and hours to be spent on each task.

**RESPONSE**

Yes, FPL does intend to outsource approximately 60% of the work to complete the Information System changes.

- a) Information System change work is consistently estimated based on this 60/40 ratio, and it would apply to each section included in Exhibit B, 60% Contractor and 40% FPL labor.

The project is estimated at approximately 25,280 hours to be applied between 2013 and 2014; therefore approximately 10,100 hours will be in-house staff work.



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<b>Approximate Labor Breakdown</b>			
Information System Change	Total Hours	Out Sourced	In-House (FPL) Staff
Data Conversion - Care Center and customer system initial configuration	5,879	3,528	2,352
Customer Information System - Billing and Financial components	9,965	5,979	3,986
Customer Information System - Core functionality	3,100	1,860	1,240
Web Enrollment - Enable customer web self-service enroll functionality	1,528	917	611
Customer system automation to enroll in opt out program	2,083	1,250	833
Care Center - Enrollment	1,504	902	601
Revenue Recovery - Online changes to support Remote Connect Switch	1,220	732	488
<b>Total</b>	<b>25,280</b>	<b>15,168</b>	<b>10,112</b>
<b>Percent of hours</b>		<b>60%</b>	<b>40%</b>

**SUMMARY of Costs for Non-Standard Meter Rider Project**

1  
2  
3  
4

	Grand Total
FPL Payroll	\$ 831,173
██████████ (contractor)	\$ ██████████
██████████ (contractor)	\$ ██████████
Local Contract (contractor)	\$ ██████████
DCC Contract (contractor)	\$ ██████████
Miscellaneous	\$ 9,852
<b>Total</b>	<b>\$ 2,051,096</b>

Exhibit B Page 4 Row 2	\$ 1,952,000
Exhibit B Page 4 Row 14	\$ 99,000
	<u>\$ 2,051,000</u>

**Florida Power & Light Company  
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- b) For the 40% of Information System changes to be performed by in-house staff, FPL employees are assigned to this project to fulfill various roles. The roles include project manager, business analysts and technical leads that coordinate the development of the programming changes in support of the NSMR program. The project manager has overall accountability for the delivery of the system changes. The business analysts gather and document business requirements and are responsible for testing the changes before they are implemented in production. FPL employees are assigned as technical leads to manage the developers from the contractor firms in the completion of the changes to the Information System.

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**Exhibit C**  
**Florida Power and Light Company**  
**Docket 130223-EI**

<b>Document</b>	<b>No. of Pages</b>	<b>Conf. Y/N</b>	<b>Line No./Col. No.</b>	<b>Florida Statute 366.093 (3) Subsection</b>	<b>Affiant</b>
FPL's Response to Staff's Second Data Request Question 1	1	N			
	2	Y	Lines 1-4	(e)	I. Robson
	3	N			

**EXHIBIT D**

**AFFIDAVIT**

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition for Approval of Optional Non-Standard Meter Rider, by Florida Power & Light Company

Docket No. 130223-EI

STATE OF FLORIDA )  
MIAMI DADE COUNTY ) **AFFIDAVIT OF IAN ROBSON**

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

1. My name is Ian Robson. I am currently employed by FPL as Director, IT Business Solutions. My business address is 9250 West Flagler Street, Miami, Florida. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C, and the documents which are included in Exhibit A to FPL's Request for Confidential Classification for which I am identified as the affiant. Such documents or materials that I have reviewed and which, in whole or in part, contain or constitute competitively sensitive information, should be protected, as the disclosure of the information could impair the competitive business of the provider of the information. Additionally, these materials are asserted by FPL to be proprietary confidential business information. Specifically, the materials contain information related to vendors FPL has contracted with for certain services. 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 18 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. Affiant says nothing further.

  
IAN ROBSON

**SWORN TO AND SUBSCRIBED** before me this 3 day of December 2013, by —, who is personally known to me or who has produced — (type of identification) as identification and who did take an oath

My Commission Expires May 7, 2016

  
Notary Public, State of Florida

