



Jessica A. Cano
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July 12, 2016

VIA HAND DELIVERY

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

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COMMISSION
CLERK

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 Second Request for Extension of Confidential Classification of Exhibit FR-1 (Document No. 06931-10). Included is one copy of Revised Pages from Exhibit A (CONFIDENTIAL), two copies of Revised Pages from Exhibit B, Second Revised Exhibit C and Second Revised Exhibit D.

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

Sincerely,

Jessica Cano

Jessica A. Cano
Fla. Bar No. 0037372

REDACTED

Enclosures
cc: Counsel for Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

Docket No. 160009-EI
Filed: July 12, 2016

**FLORIDA POWER & LIGHT COMPANY'S SECOND REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
EXHIBIT FR-1 (DOCUMENT NO. 06931-10)**

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 portions of Exhibit FR-1 to the joint testimony of Mr. Fisher and Mr. Rich filed in Docket No. 100009-EI (Document No. 06931-10). In support of its request, FPL states as follows:

1. On July 14, 2010, FPL requested confidential classification of portions of Staff's 2010 audit report on project management, which was subsequently attached to the prefiled joint testimony of Mr. Fisher and Mr. Rich as Exhibit FR-1. FPL's request was subsequently revised at a "Confidentiality Hearing" on August 20, 2010, and marked as Confidentiality Hearing Exhibit No. 2. FPL's revised request was granted by Order No. PSC-10-0540-CFO-EI. FPL's revised request and exhibits A through D are incorporated herein by reference.

2. On February 23, 2012, FPL filed its First Request for Extension of Confidential Classification of the Confidential Information, which included Revised Exhibits C and D ("February 23, 2012 Request"). By Order No. PSC-15-0039-CFO-EI, dated January 12, 2015, the Commission granted FPL's February 23, 2012 Request. FPL incorporates by reference its February 23, 2012 Request.

3. The period of confidential treatment granted by Order No. PSC-15-0039-CFO-EI will soon expire. Most of the confidential information that was the subject of Order No. PSC-15-

003-CFO-EI warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its Second Request for Extension of Confidential Classification.

4. Included herewith are Revised Pages from Exhibit A (Confidential) and Revised Pages from Exhibit B, releasing the information no longer deemed confidential. These pages should replace the similarly numbered pages in the exhibits included with FPL's original July 14, 2010 filing, as revised on August 20, 2010. Also included are Second Revised Exhibit C and Second Revised Exhibit D, containing the affidavits of Antonio Maceo, Stephanie Castaneda and Brenda Thompson in support of FPL's request.

5. The confidential information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. 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.

6. As more fully described in the affidavits included in Second Revised Exhibit D, certain portions of Exhibit FR-1 contain information concerning internal auditing controls and reports of internal auditors. This information is protected by Section 366.093(3)(b), Fla. Stat. Additionally, Exhibit FR-1 contains 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. Also, certain information in Exhibit FR-1 includes competitively sensitive information which, if disclosed,

could impair the competitive interests of the provider of the information. This information is protected by Section 366.093(3)(e), Fla. Stat. Lastly, information related to an internal investigation of an employee complaint is included. Because the investigation included interviews with employees, public disclosure of the employee names could have a chilling effect on employees' willingness to report concerns or otherwise fully cooperate with such investigation. This employee information is unrelated to their compensation, duties, qualifications or responsibilities, and is therefore protected from public disclosure pursuant to Section 366.093(3)(f), Fla. Stat. Even if that subsection did not apply, this information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093(3), such information is entitled to confidential treatment.

7. Nothing has changed since the Commission entered Order No. PSC-15-0039-CFO-EI to render the information identified as confidential in FPL's Second Revised Exhibit C public, such that continued confidential treatment would not be appropriate.

8. Thus, upon a finding by the Commission that the confidential information remains proprietary and confidential, the information should not be declassified for at least an additional eighteen (18) month period and should be returned to FPL as soon as the information no longer is 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 Second 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

By: Jessica Cano
Jessica A. Cano
Fla. Bar No. 0037372

**CERTIFICATE OF SERVICE
DOCKET NO. 160009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Second Request for Extension of Confidential Classification* was served by electronic mail this 12th day of July, 2016, to the following:

Kyesha Mapp, Esq.
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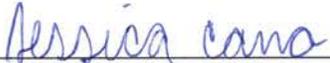
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By: 
Jessica A. Cano
Fla. Bar No. 0037372

*Exhibits are not included with service copies, but Exhibits B, C, and D are available upon request.

REVISED PAGES

EXHIBIT B

been charged properly, and in accordance with existing controls. Areas examined included employee expense reports and payroll, third party invoices, and reconciliation of amounts included on the FPSC filings. From approximately \$42.7 million in expenditures, Jefferson Wells examined \$19.9 million (47 percent).

In its conclusion, Jefferson Wells opined that FPL currently has in place adequate controls and that costs incurred are being appropriately charged to the project.

Concentric Project Controls Review

The review by Concentric Energy Advisors provided FPL with feedback on company efforts to develop the new deployment schedule, FPL's process to evaluate and revise project cost estimates, benchmarking cost estimates against those of similar new U.S. construction, and an assessment of the feasibility analysis. Concentric concluded that processes to revise project schedule and cost estimates are reasonable and produce appropriate results. Controls remain effective and largely unchanged. Concentric also concluded that FPL's feasibility analysis is a reasonable approach to evaluating project costs.

At the conclusion of the review, Concentric made 12 specific observations addressing possible changes or improvements. Concentric states that FPL adequately responded to each observation, adopting four and keeping three more under consideration for implementation. Changes adopted by FPL include using memoranda to memorialize key decisions, establishing witness points for manufacturing activities, creating spreadsheets to track pending invoice credits, and improving the transparency of invoice review and approval processes.

FPL believes three others are adequately addressed by existing company practices or procedures. A recommendation for updating Project Instructions annually was adopted, but modified to biennially. Finally, FPL considers the recommendation to develop a workforce contingency protocol a matter for future planning, when the project pace increases and moves nearer to actual construction.

One Concentric recommendation not adopted by FPL is noteworthy, that of an annual review to ensure Bechtel is billing in accordance with the terms and conditions of the contract. Concentric believed this to be particularly important regarding Bechtel subcontractors. FPSC audit staff agrees that accurate, concise, and timely billing is particularly key regarding subcontractors. This is an issue that FPSC audit staff believes should be reconsidered for implementation as the project moves to the construction phase, with significant accelerated pace and scope.

FPL does not believe an annual Bechtel review is necessary but retains the option to conduct one if future conditions warrant. The company is confident that existing contract management and controls personnel are already providing a sufficiently high level of scrutiny to contracts, contractors, their subcontractors, and every invoice received for payment. FPSC audit staff agrees that, at the present state of the project, biennial reviews are sufficient. However, FPSC audit staff believes that an annual review of Bechtel and subcontractor billing has merit and should be reconsidered for implementation by FPL as the project moves to construction.

- The EPU senior project management was alerted to the potential for the forecast to increase as early as April 2008 through [condition report] CR-2008-11443.
- The EPU senior project management reviewed a preliminary, revised forecast for PSL as early as December 2008 and a more refined version of this analysis in February 2009.
- The EPU senior management prepared the July 25, 2009 ESC presentations with the intent of providing a detailed, line-by-line review of the changes to the forecast.
- As of July 25, 2009, FPL believed the EPU Projects continued to be economic based on the revised forecast and projected incremental output.
- The VP of Power Uprate was aware of and had assisted in the presentation of a revised cost estimate to FPL's executive managers on July 25, 2009.

Concentric conducted a number of employee interviews and reviewed numerous EPU documents to test the complaint concerns expressed. The investigation confirmed many of the concerns. On June 21, 2010 Concentric provided a final report with its conclusions. Concentric concluded the following:

- FPL's decision to continue pursuing the EPU Project in 2009 was prudent and was expected to be beneficial to FPL's customers; FPL properly considered an updated cost estimate in its updated feasibility analysis in July 2009, which reinforced the conclusion that significant benefits were expected from the Project.
- All of FPL's expenditures on the EPU Project have been prudently incurred.
- Certain information provided by FPL in the 2009 NCRC was out-of-date and did not represent the best information available at the time; FPL is currently taking steps that Concentric believes will address this concern for the future.
- EPU Project management did not consistently follow certain procedures that were intended to govern this project in 2009; in addition, the Project's senior management in the first half of 2009 was slow to respond to concerns that were raised regarding project cost estimates; these issues are currently being addressed by the senior management team installed in the second half of 2009.
- FPL should consider taking certain actions that are discussed in the body of this report to strengthen the Project Controls organization and to better ensure compliance with existing procedures.

The Concentric investigation also examined the 2009 Nuclear Cost Recovery Clause proceedings to evaluate whether information provided to the FPSC during the proceedings was "accurate and consistent with the standards expected for testimony before, and submissions made to, a regulatory agency". Concentric identified that budget estimate information provided by the Vice President Uprates in his May 2009 testimony had changed and the change was not discussed in the hearing. Concentric stated in its report that:

While Concentric agrees that the new analyses confirmed the conclusions in Mr. Kundalkar's testimony, we believe that a \$300 million, or 27%, increase in the projected cost of the EPU Project should have been discussed in the live testimony on September 8, 2009.

In an interview with Concentric, FPSC audit staff determined that FPL witnesses are prepared by their attorneys for potential questions that might be asked during the hearing, as most witnesses are. During the interview, Concentric agreed that Mr. Kundalkar had participated in a line-by-line budget discussion with FPL's Executive Steering Committee in July 2009, and therefore, understood that the budget information provided in May 2009 was indeed incorrect by the time of the hearing on September 8, 2009. Yet, when asked by FPL attorney Anderson, "If I asked you the same questions contained in your prefiled direct testimony, would your answers be the same?" Mr. Kundalkar answered "Yes, they would be".

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FPSC audit staff and Concentric agree that Mr. Kundalkar knew the budget estimate was being reviewed and likely would change. In fact, Concentric states in the [REDACTED] investigation report:

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On September 9, 2009, the ESC was presented with a newly revised forecast that further increased the cost [of] the EPU Projects by approximately \$104 million total for both sites. This presentation stated that approximately 30% of the total project costs have "high certainty".

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Upon completing its investigation, Concentric provided FPL with four recommendations intended to "improve the distribution of information within FPL, the NCRC docket team and to the FL PSC". These recommendations are:

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- Concentric recommends that the process be changed in order to provide timely and ongoing information within the NCRC docket team throughout each NCRC review cycle. This will help to ensure that any updated information is fully discussed within the NCRC docket team and prevent future concerns related to flow of information to the FL PSC. Concentric has been informed that this change has already been implemented.
- Similar to the recommendation above, FPL and the FL PSC staff should revisit the issue of intra/inter-cycle document production. The ongoing production of a limited number of key project documents could enhance the FL PSC staff's understanding of the projects and how they are developing on an on-going basis.
- The NCRC docket team has included and continues to include a number of first time witnesses or witnesses with limited experience serving in this role. As a result, it is vitally important that FPL's Law and Regulatory Affairs Departments continue to provide explicit instruction and guidance to these individuals. It is our understanding that the importance of updating one's pre-filed testimony and exhibits is an explicit part of the witness training program, which we believe should be conveyed through written instructions.
- As part of our investigation Concentric reviewed the list of invitees to the ESC presentations. Noticeably absent from these lists of invitees in 2009 was a representative from FPL's Regulatory Affairs and Law Departments. Given the importance and scale of the EPU Projects, and the alternative cost recovery treatment being afforded to these projects, a relatively senior member of Regulatory Affairs Department should attend each future ESC presentation. It is our understanding that this change has recently been implemented.

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**SECOND REVISED
EXHIBIT C**

JUSTIFICATION TABLE

Second Revised Exhibit C

Company: Florida Power and Light Company
Title: Project Management Internal Controls Report for Nuclear Plant Uprate and Construction Projects: PA-10-01-001
Docket No.: 160009-EI

Document	Description	No. of Pages	Conf. Y/N	Page/Col Numbers*	Florida Statute 366.093 (3) Subsection	Affiant
Report	Internal Control Report for EPU & PTN	53	N	Pages 1-8, 10-18, 21, 24, 26-35, 37, 40-41, 43, 51-52;		
			Y	Page 9, Lines 5, 7, 9;	(d)(e)	Stephanie Castaneda
				Page 19, Line 1;	(d), (e)	Brenda Thompson
				Page 20, Lines 4-7;	(b), (e)	Antonio Maceo
			N	Page 20 Line 3		
			Y	Page 22, Lines 12-14, 16-17, 19-20,	(e)	Brenda Thompson
				Page 22 Lines 34-36	(d)	Brenda Thompson
				Page 23, Col 4, Lines 1-11; Lines 13-14, 16; Col 3, Lines 19-21;	(d), (e)	Brenda Thompson
				Page 25, Lines 18-19;	(d), (e)	Stephanie Castaneda
				Page 36, Lines 18, 20-21;	(d), (e)	Stephanie Castaneda
				Page 38, Lines 13, 18, 28, 37;	(d), (e)	Stephanie Castaneda
				Page 39, Lines 3, 11, 17;	(d), (e)	Stephanie Castaneda
				Page 42, Line 1;	(d), (e)	Stephanie Castaneda
	Page 44, Line 1;	(e), (f)	Stephanie Castaneda			

Document	Description	No. of Pages	Conf. Y/N	Page/Col Numbers*	Florida Statute 366.093 (3) Subsection	Affiant
			N	Page 45, Line 1;		
			Y	Page 46, Lines 10	(e), (f)	Stephanie Castaneda
			N	Page 46 Lines 3, 8-9		
			Y	Page 47, Line 1;	(e)	Stephanie Castaneda
				Page 48, Line 1;	(d), (e)	Stephanie Castaneda
				Page 49, Line 1; Col 1, Lines 5-16;	(d), (e)	Stephanie Castaneda
				Page 50, Lines 17-21, 23-24, 26;	(d), (e)	Stephanie Castaneda
				Page 53, Lines 24, 26, 29	(d), (e)	Stephanie Castaneda

Note 1: page numbers correspond to the handwritten page numbers on each page in the report.

Note 2: bold text denotes a revision

SECOND REVISED

EXHIBIT D

DECLARATIONS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

DOCKET NO. 160009-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT 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 Revised Exhibit C and the documents that are included in FPL's Second Request for Extension of Confidential Classification of information contained in the 2010 Project Management Internal Controls audit report, for which I am listed 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 terms. Additionally, information related to an internal investigation of an employee complaint is included. Because the investigation included interviews with employees, public disclosure could have a chilling effect on employees' willingness to report concerns or otherwise fully cooperate with such investigations. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

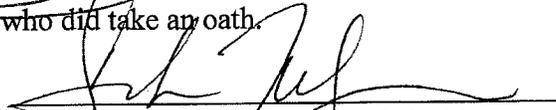
3. No significant changes have occurred since the issuance of Order No. PSC-15-0039-CFO-EI to render the information identified in Revised Exhibit C stale or public such that continued confidential treatment would not be appropriate. Accordingly, this information should continue to be maintained as confidential 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.

4. Affiant says nothing further.



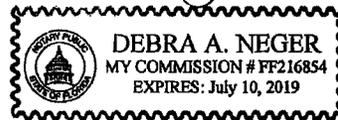
Stephanie Castaneda

SWORN TO AND SUBSCRIBED before me this 11 day of July 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.



Notary Public, State of Florida

My Commission Expires:



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

DOCKET NO. 160009-EI

STATE OF FLORIDA)
)
MIAMI-DADE COUNTY)

AFFIDAVIT OF ANTONIO MACEO

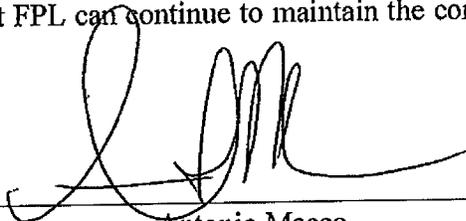
BEFORE ME, the undersigned authority, personally appeared Antonio Maceo who, being first duly sworn, deposes and says:

1. My name is Antonio Maceo. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Auditing. I have personal knowledge of the matters stated in this affidavit.

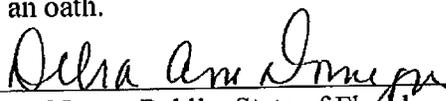
2. I have reviewed Revised Exhibit C and the documents that are included in FPL's Second Request for Extension of Confidential Classification of information contained in the 2010 Project Management Internal Controls audit report, for which I am identified on Revised Exhibit C as the affiant. The documents or materials that I have reviewed contain information related to reports of internal auditors. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may affect the effectiveness of the Internal Auditing Department itself. 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-15-0039-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.

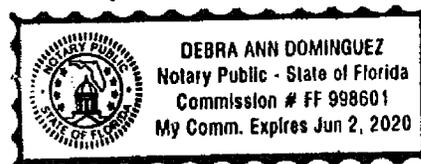
4. Affiant says nothing further.


Antonio Maceo

SWORN TO AND SUBSCRIBED before me this 11 day of July 2016, by Antonio Maceo who is personally known to me or who has produced _____ (type of identification) as identification and who did take an oath.


Notary Public, State of Florida

My Commission Expires: June 2, 2020



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

DOCKET NO. 160009-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT OF BRENDA THOMPSON

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

1. My name is Brenda Thompson. I am currently employed by Florida Power & Light Company as Nuclear Project Controls Manager. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Revised Exhibit C and the documents that are included in FPL's Second Request for Extension of Confidential Classification of information contained in the 2010 Project Management Internal Controls audit report, for which I am listed 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 terms. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

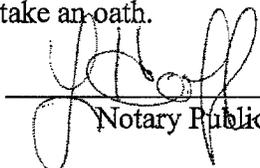
3. No significant changes have occurred since the issuance of Order No. PSC-15-0039-CFO-EI to render the information identified in Revised Exhibit C stale or public such that continued confidential treatment would not be appropriate. Accordingly, this information should continue to be maintained as confidential 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.

4. Affiant says nothing further.



Brenda Thompson

SWORN TO AND SUBSCRIBED before me this 11 day of July 2016, by Brenda Thompson, who is personally known to me or who has produced N/A (type of identification) as identification and who did take an oath.



Notary Public, State of Florida

My Commission Expires:

