

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: July 27, 2016
TO: Suzanne Brownless, Office of the General Counsel
FROM: Matthew Vogel, Division of Accounting & Finance
RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NO: 160021-EI DOCUMENT NO: 04206-16

DESCRIPTION: FPL (Moncada) - (CONFIDENTIAL) Responses to discovery requests propounded by FIPUG (3rd set of interrogatories, No. 69); OPC (4th set of interrogatories, Nos. 145 (on CD) and 149 (on CD); 11th set of interrogatories, Nos. 294); staff (3rd set of interrogatories, No. 114 (on CD); 17th set of interrogatories, Nos. 295 and 301 (on CD).

SOURCE: Florida Power & Light Company

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COMMISSION
CLERK

Pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), Florida Power & Light Company (FPL or Company) requests confidential classification of its responses to FIPUG's 3rd Set of Interrogatories (No. 69); OPC's 4th Set of Interrogatories (Nos. 145 and 149); 11th Set of Interrogatories (No. 249); staff's 3rd Set of Interrogatories (No. 114); and staff's 17th Set of Interrogatories (Nos. 295 and 301). (Document No. 04206-16)

With regard to FPL's response to FIPUG's Interrogatory No. 69, this information contains employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. Therefore, staff recommends that this information included in interrogatory No. 69 should be deemed confidential pursuant to Section 366.093(3)(f), F.S.

With regards to FPL's responses to OPC's Interrogatory Nos. 145, 149, and 294, these requests contain information relating to competitive interests. Therefore, staff recommends that the information included in Interrogatories No. 145, 149, and 294 be deemed confidential pursuant to Section 366.093(3)(e), F.S.

With regards to FPL's responses to staff's Interrogatory Nos. 114, 295, and 301, these requests contain information relating to competitive interests and information concerning bids or contractual data. Therefore, staff recommends that the information included in Interrogatories No. 114, 295, and 301 be deemed confidential pursuant to Section 366.093(3)(d) and (e), F.S.

Therefore, in staff's opinion, the requests meet the criteria for confidentiality contained in Sections 366.093(3)(d), (e) and (f), F.S. Staff recommends that the request for confidentiality of all of the other information included in Document No. 04206-16 be approved.

cc: Office of Commission Clerk
AFD (Fletcher, Mick)
ENG (Ellis, Matthews)



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-M-E-M-O-R-A-N-D-U-M-

DATE: July 27, 2016

TO: Division of Accounting and Finance, Office of Primary Responsibility

FROM: OFFICE OF COMMISSION CLERK

RE: CONFIDENTIALITY OF CERTAIN INFORMATION
DOCKET NO: 160021-EI DOCUMENT NO: 04206-16
DESCRIPTION: FPL (Moncada) - (CONFIDENTIAL) Responses to discovery requests propounded by FIPUG (3rd set of interrogatories, No. 69); OPC (4th set of interrogatories, Nos. 145 (on CD) and 149 (on CD); 11th set of interrogatories, Nos. 294); staff (3rd set of interrogatories, No. 114 (on CD); 17th set of interrogatories, Nos. 295 and 301 (on CD).
SOURCE: Florida Power & Light Company

The above confidential material was filed along with a third request for confidential classification. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
- The utility has provided enough details to perform a reasoned analysis of its request.
- The material has been received incident to an inquiry.
- The material is confidential business information because it includes:
 - (a) Trade secrets;
 - (b) Internal auditing controls and reports of internal auditors;
 - (c) Security measures, systems, or procedures;
 - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms;
 - (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information;
 - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
- The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- The material appears not to be confidential in nature.
- The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by /s/ Matthew A. Vogel on July 27, 2016, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.