



Jessica A. Cano
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5226
(561) 691-7135 (Facsimile)

April 13, 2017

VIA HAND DELIVERY

Ms. Carlotta Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 170009-EI; Nuclear Cost Recovery Clause

Dear Ms. Stauffer:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is its First Request for Extension of Confidential Classification of Audit 15-005-4-1 Work Papers (confidential document no. 04142-15). FPL's request includes First Revised Exhibit C and First Revised Exhibit D.

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

Sincerely,

s/ Jessica A. Cano

Jessica A. Cano
Fla. Bar No. 0037372

Enclosures
cc: Counsel for Parties of Record (w/out enc.)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

Docket No. 170009-EI
Filed: April 13, 2017

**FLORIDA POWER & LIGHT COMPANY'S
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL
CLASSIFICATION OF AUDIT 15-005-4-1 WORK PAPERS**

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 certain information provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control Number 15-005-4-1 ("the Audit") and reflected in Staff's work papers. In support of its request, FPL states as follows:

1. On July 6, 2015, in Docket No. 150009-EI, FPL filed a Request for Confidential Classification of portions of the Audit work papers (Confidential Document No. 04142-15). FPL's request was granted by Order No. PSC-15-0458-CFO-EI, issued October 13, 2015. The period of confidential treatment granted by Order No. PSC-15-0458-CFO-EI will soon expire. FPL has reviewed the confidential documents and determined that all the information that was the subject of Order No. PSC-15-0458-CFO-EI warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3), Florida Statutes.

2. FPL hereby submits its First Request for Extension of Confidential Classification. Exhibits A and B from FPL's July 6, 2015 filing are incorporated herein by reference. Included herewith are First Revised Exhibit C and First Revised Exhibit D.

3. First Revised Exhibit C is a table containing the specific line, column and page references to the confidential information, and references to the specific statutory basis or bases for the claim of confidentiality and to the declaration in support of the continued confidential classification.

4. First Revised Exhibit D contains the declarations of Brenda Thompson and Antonio Maceo in support of FPL's request.

5. The information that was granted confidential treatment by Order No. PSC- 15-0458-CFO-EI continues to be 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 in that the disclosure of the information would cause harm to customers or FPL's business operations, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and it 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.

6. As the declarations in First Revised Exhibit D indicate, some of the information in the Audit work papers is proprietary, confidential business information. The Audit work papers contain information related to reports of internal auditors. This information is protected from public disclosure by Section 366.093(3)(b), Florida Statutes. The work papers also contain information related to contractual data, such as pricing terms, the public disclosure of which would violate nondisclosure provisions of FPL's contracts with certain vendors and impair FPL's ability to contract for goods or services on favorable terms in the future. Such information is protected from public disclosure by Section 366.093(3)(d), Florida Statutes. The work papers also include competitively sensitive information which, if disclosed, could impair the competitive interests of the provider of the information. Such information is protected from public disclosure by Section 366.093(3)(e), Florida Statutes. Additionally, a few documents

include competitively sensitive information related to certain employees' compensation. Public disclosure of compensation information would enable competing employers to meet or beat the compensation currently offered, 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. Such information is also protected by Section 366.093(3)(e), Florida Statutes.

7. Nothing has changed since the issuance of Order No. PSC-15-0458-CFO-EI to render the confidential information stale or public, such that continued confidential treatment would not be appropriate. Upon a finding by the Commission that the information referenced in First Revised Exhibit C continues to be proprietary confidential business information, the information should not be declassified for a period of at least an additional 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.

WHEREFORE, for the above and foregoing reasons, as supported by the materials and declarations included herewith, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification of Audit 15-005-4-1 Work Papers 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: s/ Jessica A. Cano
Jessica A. Cano
Fla. Bar No. 0037372

**CERTIFICATE OF SERVICE
DOCKET NO. 170009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's First Request for Extension of Confidential Classification of Audit 15-005-4-1 Work Papers* was served electronically this 13th day of April, 2017, to the following:

Kyesha Mapp, Esq.
Margo Leathers, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
kmapp@psc.state.fl.us
mleather@psc.state.fl.us

Matthew Bernier, Esq., Sr. Counsel
106 East College Ave., Suite 800
Tallahassee, Florida 32301-7740
Matthew.bernier@duke-energy.com
Attorney for Duke Energy Florida, Inc.

Jon C. Moyle, Jr., Esq.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
Attorney for Fla. Industrial Power Users Group

Patricia A. Christensen, Esq.
Associate Public Counsel
Office of Public Counsel
The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399
Christensen.patty@leg.state.fl.us
Attorney for Citizens of the State of Florida

Dianne M. Triplett, Esq.
299 First Avenue North
St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com
Attorney for Duke Energy Florida, Inc.

Victoria Méndez, City Attorney
Xavier Albán, Assistant City Attorney
Christopher A. Green, Senior Assistant
City Attorney
Kerri L. McNulty, Assistant City Attorney
City of Miami
444 S.W. 2nd Avenue, Suite 945
Miami, FL 33130-1910
vmendez@miamigov.com
xealban@miamigov.com
cagreen@miamigov.com
klmcnulty@miamigov.com
mgriffin@miamigov.com
Attorneys for City of Miami

James W. Brew, Esq.
Laura A. Wynn, Esq.
Stone, Mattheis, Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, N.W.
Eighth Floor, West Tower
Washington, D.C. 20007
jbrew@smxblaw.com
law@smxblaw.com
*Attorneys for White Springs Agricultural
Chemicals, Inc. d/b/a PCS Phosphate – White
Springs*

George Cavros, Esq.
120 E. Oakland Park Blvd., Suite 105
Ft. Lauderdale, FL 33334
George@cavros-law.com
*Attorney for Southern Alliance for Clean
Energy*

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

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

First Revised Exhibit C

Company: Florida Power and Light Company
Title: List of Confidential Work Papers Audit Control No. 15-005-4-1
Docket No.: 150009-EI

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Declarant
Index	Confidentiality Index	2	N			
Document Control Log	Document Control Log	4	N			
9-1	Internal Audit Notes	2	Y	All	(b)	Antonio Maceo
9-2	Internal Audits	2	Y	All	(b)	Antonio Maceo
9-3	Internal Audits	1	Y	All	(b)	Antonio Maceo
12-2	CWIP Report	2	N			
19-2	WBS/Cost Element Report	2	N			
19-3	WBS Report	1	N			
19-3/1	Sample	2	Y	Pages 1-2 Column A	(d)(e)	Brenda Thompson
19-3/1-1	Sample Item	3	Y	Page 1 Lines 1-4 Page 2 Line 1 Page 3 Lines 1-7	(d)(e)	Brenda Thompson
19-3/2	Sample	2	Y	Pages 1-2 Columns A-B	(d)(e)	Brenda Thompson
19-1/2-1	Sample Item	1	N			
19-3/2-2	Sample Item	1	Y	Page 1 Lines 1-2	(d)(e)	Brenda Thompson
19-3/3	Sample	1	Y	Page 1 Column A	(d)(e)	Brenda Thompson
19-3/3-1	Sample Item	1	N			
19-3/3-2	Sample Item	1	Y	Page 1 Lines 1-2	(d)(e)	Brenda Thompson
19-3/4	Sample	1	Y	Page 1 Lines 1-7	(d)(e)	Brenda Thompson
19-3/4-1	Sample Item	1	N			
19-3/4-2	Sample Item	2	Y	Page 1 Line 1 Page 2 No	(d)(e)	Brenda Thompson
19-3/5	Sample	1	Y	Page 1 Column A	(d)(e)	Brenda Thompson

19-3/6	Sample	1	Y	Page 1 Column A	(d)(e)	Brenda Thompson
19-3/6-1	Sample Item	3	Y	Page 1 No Page 2 Lines 1-6 Page 3 Line 1	(d)(e)	Brenda Thompson
19-3/6-2	Sample Item	1	N			
19-3/7	Sample	1	Y	Page 1 Lines 1-12	(d)(e)	Brenda Thompson
19-3/8	Sample	1	Y	Page 1 Column A	(d)(e)	Brenda Thompson
19-3/9	Sample	1	Y	Page 1 Column A and Lines 1-2	(d)(e)	Brenda Thompson
20	T-3A	1	N			
20-1	2014 Estimated Payroll Tax Deduction	1	Y	Page 1 Columns A-M	(e)	Brenda Thompson
20-2	Tax Deduction Adj. Calculation	1	Y	Page 1 Columns A-D	(e)	Brenda Thompson
21-1	T 7	2	Y	Page 1 Columns A-D Page 2 Column A		Brenda Thompson
24-1	Payroll Report	1	Y	Page 1 Column A	(d)(e)	Brenda Thompson
24-2	Payroll Excerpt	1	Y	Page 1 Column A and Line 1	(e)	Brenda Thompson
24-3	Payroll Schedule	10	Y	Page 1 Column A Page 2 Column A and Line 1 Page 3-10 Column A	(e)	Brenda Thompson
24-3/1	Employee Hours	4	N			
24-3/2	Employee Hours	3	N			
24-3/3	Employee Hours	3	N			
24-3/4	Timesheet Hours	12	Y	Pages 1-8 No Page 9 Line 1 Pages 10-12 No	(e)	Brenda Thompson
24-3/5	Salary Report	1	Y	Page 1 Lines 1-5	(e)	Brenda Thompson
24-3/6	Salary Report	1	Y	Page 1 Lines 1-5	(e)	Brenda Thompson
24-3/7	Salary Report	1	Y	Page 1 Lines 1-5	(e)	Brenda Thompson

24-4	Overhead Rates Calculation	1	Y	Page 1 lines 1-16	(e)	Brenda Thompson
24-4/1	Overhead Rates	1	Y	Page 1 Column A	(e)	Brenda Thompson
24-4/2	Monthly Overhead Rates	1	Y	Page 1 Columns A-M	(e)	Brenda Thompson
24-4/2-1	December OH Rate	1	Y	Page 1 Column A	(e)	Brenda Thompson
24-4/2-2	Utility Explanation	1	N			
25	Affiliate Cost Per SAP Excerpt	1	Y	Page 1 Columns A-C	(d)(e)	Brenda Thompson
25-1	Affiliate Services	1	N			
25-1/1	Affiliate Job Description	1	N			
25-2	Lower of Cost or Market	1	Y	Page 1 Lines 1-3	(d)(e)	Brenda Thompson
25-3	Affiliate Loader Rates	1	Y	Page 1 Columns A-D	(d)(e)	Brenda Thompson
25-4	Adjustment for Dec. Charges	1	N			
27	Legal Fees Per SAP Excerpt	1	N			
27-1	Legal Service Vendors	1	Y	Page 1 Column A	(d)(e)	Brenda Thompson
27-2	Litigation Testing	3	Y	Pages 1-2 Column A Page 3 Column A and Line 1	(d)(e)	Brenda Thompson
27-2/1	Daryl Owens Services	1	N			
27-3	Litigation Appeal Costs as of 12/31/2014	1	Y	Page 1 Column A	(d)(e)	Brenda Thompson
27-3/1	Legal Services for SCA and HGS Allocation	2	Y	Page 1 Column A Page 2 Columns A-C	(d)(e)	Brenda Thompson
27-3/2	Site Certification Appeal Follow-Up	1	Y	Page 1 Line 1	(d)(e)	Brenda Thompson

First Revised Exhibit D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

DOCKET NO. 170009-EI

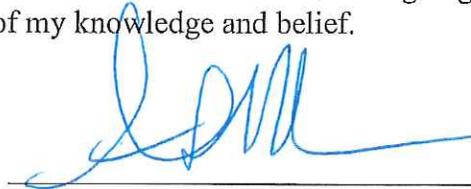
DECLARATION OF ANTONIO MACEO

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

2. I have reviewed Revised Exhibit C and the documents that are included in FPL's First Request for Extension of Confidential Classification of Audit 15-005-4-1 Work Papers, for which I am identified on 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 scope, 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. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for an additional 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. 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.



Antonio Maceo

Date: 4/11/17

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost)
Recovery Clause)

DOCKET NO. 170009-EI

DECLARATION OF BRENDA THOMPSON

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 declaration.

2. I have reviewed Revised Exhibit C and the documents that are included in FPL's First Request for Extension of Confidential Classification of Audit 15-005-4-1 Work Papers, for which I am identified on 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, certain of these materials 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 an additional 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. 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.



Brenda Thompson

Date: 4/12/17