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June 16, 2017

**-VIA ELECTRONIC FILING-**

Carlotta Stauffer, Director  
Division of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

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

Dear Ms. Stauffer:

Please find enclosed for filing in the above referenced docket Florida Power & Light Company's ("FPL's") First Request for Extension of Confidential Classification of Audit PA-15-01-002 Work Papers, including Revised Exhibit C and Revised Exhibit D

If there are any questions regarding this filing, please contact me at 561-304-5226.

Sincerely,

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

Enclosures  
cc: Counsel for Parties of Record

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Cost                    )  
Recovery Clause                    )

Docket No. 170009-EI  
Filed: Jun 16, 2017

**FLORIDA POWER & LIGHT COMPANY'S  
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL  
CLASSIFICATION OF AUDIT PA-15-01-002 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 PA-15-01-002 ("the Audit") and reflected in Staff's work papers. In support of its request, FPL states as follows:

1. On October 7, 2015, in Docket No. 150009-EI, FPL filed a Request for Confidential Classification of portions of the Audit work papers (Confidential Document No. 06309-15). FPL's request was granted by Order No. PSC-15-0579-CFO-EI, issued December 21, 2015. The period of confidential treatment granted by Order No. PSC-15-0579-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-15-0579-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 October 7, 2015 filing are incorporated herein by reference. Included herewith are Revised Exhibit C and Revised Exhibit D.

3. 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. 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-15-0579-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 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.

7. Nothing has changed since the issuance of Order No. PSC-15-0579-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 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 PA-15-01-002 Work Papers be granted.

Respectfully submitted,

Jessica A. Cano  
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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 PA-15-01-002 Work Papers\* was served electronically this 16<sup>th</sup> day of June, 2017, to the following:

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*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.

**Revised Exhibit C**  
**Florida Power and Light Company**  
**Staff Audit Work Papers for Audit Report PA-15-01-002**  
**Docket No. 150009-EI**

<b>Document</b>	<b>Description</b>	<b>Page Number(s)</b>	<b>Conf. Y/N</b>	<b>Line No./Col. No.</b>	<b>Florida Statute 366.093 (3) Subsection</b>	<b>Declarant</b>
Staff Audit Work Papers	Review of Florida Power and Light Company's Project Management Internal Controls for Turkey Point 6 & 7 Construction	1-64, 66-91, 93-94, 96, 100-103, 107-108, 111-115, 117-119, 121-154	N			
	3.1.2 DR 2	Pg. 65	Y	Line 1-10	(d)(e)	Brenda Thompson
	3.3.1 DR 1 Document Summary & Control Log	Pg. 92	Y	Line 1-4	(e)	Brenda Thompson
		Pg. 95	Y	Lines 1-2	(d)(e)	Brenda Thompson
		Pg. 97	Y	Lines 1-7	(d)(e)	Brenda Thompson
		Pg. 98	Y	Lines 1-8	(d)(e)	Brenda Thompson
		Pg. 99	Y	Lines 1-2	(d)(e)	Brenda Thompson
	3.3.2 DR 2 Document Summary & Control Log	Pg. 104	Y	Lines 1-5	(d)(e)	Brenda Thompson
		Pg. 105	Y	Lines 1-9	(d)(e)	Brenda Thompson
		Pg. 106	Y	Lines 1-8	(d)(e)	Brenda Thompson
	3.3.3 DR 3 Document Summary & Control Log	Pg. 109	Y	Line 1-8	(b)	Antonio Maceo
		Pg. 110	Y	Lines 1-6	(b)	Antonio Maceo

	3.3.4 DR 4 Document Summary & Control Log	Pg. 116	Y	Line 1	(d)(e)	Brenda Thompson
	3.3.5 Document Summary & Control Log	Pg. 120	Y	Lines 1-12	(d)(e)	Brenda Thompson

**REVISED EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Cost )  
Recovery Clause )

DOCKET NO. 170009-EI

**DECLARATION OF BRENDA THOMPSON**

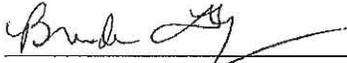
**BEFORE ME**, the undersigned authority, personally appeared Brenda Thompson who, being first duly sworn, deposes and says:

1. My name is Brenda Thompson. I am currently employed by Florida Power & Light Company ("FPL") 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 First Request for Extension of Confidential Classification of information contained in the Florida Public Service Commission's audit staff's work papers for Audit Report PA 15-01-002, 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 information concerning bids or 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. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for an additional period of not less than 18 months. Nothing has changed since Order No. PSC-15-0579-PCO-EI was issued to render the information stale or public such that continued confidential treatment would not be warranted. 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: 6/13/17

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Cost )  
Recovery Clause \_\_\_\_\_)

DOCKET NO. 170009-EI

**DECLARATION OF ANTONIO MACEO**

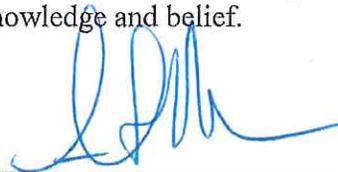
**BEFORE ME**, the undersigned authority, personally appeared Antonio Maceo who, being first duly sworn, deposes and says:

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 First Request for Extension of Confidential Classification of information contained in the Florida Public Service Commission's audit staff's work papers for Audit Report PA 15-01-002, 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. Nothing has changed since Order No. PSC-15-0579-PCO-EI was issued to render the information stale or public such that continued confidential treatment would not be warranted. 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: \_\_\_\_\_

6/13/17