

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

Docket No: 20180007-EI

Date: April 16, 2018

**FLORIDA POWER & LIGHT COMPANY'S SECOND REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 14-010-4-1**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its Second Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 14-010-4-1 ("Confidential Information"). In support of this request, FPL states as follows:

1. On June 23, 2014, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("June 23, 2014 Request"). By Order No. PSC-14-0485-CFO-EI, dated September 12, 2014 ("Order 0485"), the Commission granted FPL's June 23, 2014 Request. FPL adopts and incorporates by reference the June 23, 2014 Request and Order 0485.

2. On February 11, 2016, FPL filed its First Request for Extension of Confidential Classification of the Confidential Information, which included First Revised Exhibits A, B, C and D ("February 11, 2016 Request"). By Order No. PSC-16-0460-CFO-EI, dated October 14, 2016 ("Order 0460"), the Commission granted FPL's Request. FPL adopts and incorporates by reference the February 11, 2106 Request and Order 0460.

3. The period of confidential treatment granted by Order 0460 will soon expire. The Confidential Information that was the subject of FPL's February 11, 2016 Request and Order 0460 warrants continued treatment as proprietary and confidential business information within

the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

4. All of the information designated in First Revised Exhibits A and B to the February 11, 2016 Request remains confidential. Accordingly, those exhibits will not be reproduced or reattached here.

5. Included with this Request are Second Revised Exhibit C and Second Revised Exhibit D. Second Revised Exhibit D is the declaration of Craig Arcari in support of this request. Regarding Second Revised Exhibit C, all of the information listed in the February 11, 2016 Request remains confidential; that Exhibit is revised only to identify Craig Arcari as the new declarant.

6. 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.

7. As described more fully in the declaration included as Second Revised Exhibit D, the documents provided by FPL contain information pertaining to the competitive interests of FPL and its vendors, and would place FPL or its vendors at a disadvantage when coupled with the other information that is publicly available. This information is protected by Section 366.093(3)(e), Fla. Stat.

8. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional thirty-six (36) month period and should be returned to FPL as soon as it 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 more fully set forth in the supporting materials and declarations included herewith, Florida Power & Light Company respectfully requests that its Second Request for Extension of Confidential Classification be granted.

Respectfully submitted,

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By: s/ Maria J. Moncada
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CERTIFICATE OF SERVICE
Docket No. 20180007-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic service on this 16th day of April 2018 to the following:

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EXHIBIT C

JUSTIFICATION TABLE

SECOND REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: FPL, Environmental Cost Recovery Clause
AUDIT CONTROL NO: 14-010-4-1
DOCKET NO: 20180007-EI
DATE: April 16, 2018

Bold denotes a new declarant

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
12-1	Reconciliation of Plant in Service to the General Ledger	2	N			
12-1/1	Reconciliation of Plant in Service to the General Ledger	1	N			
12-1/1-1	Screen Print of Total Plant in Service per General Ledger	2	N			
12-2	Reconciliation of Accumulated Depreciation and Depreciation Expense to the General Ledger	2	N			
12-2/1	Reconciliation of Capital Investment Filing Schedules	1	N			
12-4	Reconciliation of CWIP to the General Ledger	1	N			
12-4/1	Detail of CWIP Work Orders per Report 1902	22	N			
12-4/2	Total CWIP per Report 1902	91	N			
12-4/2-1	Screen Print of Total CWIP	1	N			
19 page 2	Summary of W.O. orders tested	1	N			
19-1	Work Orders	2	N			
19-2	Work Orders	1	N			
19-2/1	Sample	3	N			
41-1	Revenues per Revenue and Rate Report	1	N			
41-2	Calculation of Revenue Rates-January	1	N			
41-3	Calculation of Revenue Rates-February	1	N			
43-1 page 2	Reconciliation of O & M Expenses	1	N			
43-2	Sample	3	Y	Pg. 1, Col. A, Lns. 1, 2 and Pg. 2, Col. A Col. B, Line 1 Pg. 3, Col. A	(e)	C. Arcari

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
43-2/1	Supporting documentation	3	N			
43-3	Sample	1	Y	Col. A	(e)	C. Arcari
43-4	Sample	3	Y	Pg. 1, Cols. A and C Col. B, Lns. 1 and 2 Pgs. 2-3, Cols. A and B	(e)	C. Arcari
43-5	Sample	2	N			
43-5/1	Scherer O & M Report	10	N			
43-5/2	Sample	33	N			
43-5/2-1	Supporting documentation	1	N			

EXHIBIT D

DECLARATION

SECOND REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

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DECLARATION OF CRAIG W. ARCARI

1. My name is Craig W. Arcari. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Power Generation, FPL Operations. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Second Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 14-010-4-1 for which I am identified as the declarant. The documents or materials that I have reviewed, and which are asserted by FPL to be proprietary confidential business information contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms in the future, and would impair the competitive interests of the goods provider. Specifically, the information provided by FPL contains negotiated pricing information for solar equipment. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-16-0460-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of not less than 36 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.



Craig W. Arcari

Date: 4/12/2018