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October 4, 2018

**VIA HAND DELIVERY**

Ms. Carlotta S. Stauffer  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
2018 OCT -4 AM 11:19  
COMMISSION  
CLERK

**Re: Docket No. 20180001-EI**

**REDACTED**

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Third Request for Extension Confidential Classification of Materials Provided Pursuant to Audit No. 13-016-4-1. The request includes Third Revised Exhibits A, B (two copies), C and D.

Third Revised Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Third Revised Exhibit B is an edited version of Third Revised Exhibit A, in which the information FPL asserts is confidential has been redacted. Third Revised Exhibit C is a justification table in support of FPL's Third Request for Extension of Confidential Classification. Third Revised Exhibit D contains the declarations in support of FPL's Request.

Please contact me if you have or your Staff has any questions regarding this filing.

Sincerely,

Maria J. Moncada

Enclosure

cc: Counsel for Parties of Record (w/ copy of FPL's Third Request for Extension of Confidential Classification)

COM \_\_\_\_\_  
AED \_\_\_\_\_  
APA 1 Exh. B  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
CLK \_\_\_\_\_

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and purchase power cost recovery  
clause with generating performance incentive  
factor

Docket No: 20180001-EI

Date: October 4, 2018

**FLORIDA POWER & LIGHT COMPANY'S THIRD REQUEST  
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF  
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 13-016-4-1**

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 Third Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 13-016-4-1 ("Confidential Information"). In support of this request, FPL states as follows:

1. On May 22, 2013, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("May 22, 2013 Request"). By Order No. PSC-13-0406-CFO-EI, dated August 30, 2013 ("Order 0406"), the Commission granted FPL's May 22, 2013 Request. FPL adopts and incorporates by reference the May 22, 2013 Request and Order 0406.

2. By Order No. PSC 15-0370-CFO-EI dated March 12, 2015, the Commission granted FPL's First Request for Extension of Confidential Classification.

3. On February 6, 2017, FPL filed its Second Request for Extension of Confidential Classification, which included Second Revised Exhibits A, B, C and D ("February 6, 2017 Request"). By Order No. PSC-17-0126-CFO-EI dated April 4, 2017 ("Order 0126"), the Commission granted FPL's February 6, 2017 Request. FPL adopts and incorporates by reference the February 6, 2017 Request and Order 0126.

4. The period of confidential treatment granted by Order 0126 will soon expire. Some of the Confidential Information that was the subject of FPL's February 6, 2017 Request

and Order 0126 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its Third Request for Extension of Confidential Classification.

5. Included with this Request are Third Revised Exhibit A, Third Revised Exhibit B, together with Third Revised Exhibit C to reduce the number of pages for which confidential treatment is sought.

6. Third Revised Exhibits A and B consist of highlighted and redacted copies of the specific working papers where FPL has determined that a portion of the information previously designated as confidential requires continued confidential treatment. Where entire pages of a working paper are confidential, FPL has included only identifying cover pages in Third Revised Exhibit B.

7. Third Revised Exhibit C is a table that identifies the specific pages, lines or columns that remain confidential. The table also references the specific statutory basis for confidentiality and the declarants who support the requested classification.

8. Third Revised Exhibit D contains the declarations of Antonio Maceo and Gerard J. Yupp in support of this request.

9. 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.



10. As more fully described in the declarations included in Third Revised Exhibit D, certain documents provided by FPL constitute internal auditing controls, reports or notes of internal auditors, or information relating to internal audit reports. This information is protected by Section 366.093(3)(b), Fla. Stat.

11. Additionally, certain documents contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its vendors to contract for goods and services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

12. Pursuant Section 366.093(4), F.S., the information for which confidential classification is granted remains protected from disclosure up to 18 months unless good cause is shown to grant protection from disclosure for a longer period. Currently, the Commission retains audit reports for period of seven years at which time the audit materials are returned to FPL unless Commission staff or another affected person requests that these audit materials continue to be retained. The nature of these materials will not change in the next three years. Therefore, to promote administrative efficiency, FPL requests confidential classification for a period of thirty-six (36) months. 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, Florida Power & Light Company respectfully requests that its Third

Request for Extension of Confidential Classification be granted.

Respectfully submitted,

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By: \_\_\_\_\_

  
Maria J. Moncada  
Florida Bar No. 0773301

**CERTIFICATE OF SERVICE**

**Docket No. 20180001-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Third Request for Extension of Confidential Classification\* has been furnished by electronic service on this 4th day of October 2018 to the following:

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Maria J. Moncada  
Florida Bar No. 0773301

\*The exhibits to this Request are not included with the service copies, but copies of Third Revised Exhibits B, C and D are available upon request.



**THIRD REVISED  
EXHIBIT A**

**CONFIDENTIAL  
FILED UNDER SEPARATE COVER**



**THIRD REVISED  
EXHIBIT B**

**REDACTED COPIES**

**CONFIDENTIAL**

Title Internal Audits

**2012 AUDIT REPORTS**

**PSC Request #1**

**January 1, 2012 through December 31, 2012**

*1/19/2013*

- |     |   |         |            |
|-----|---|---------|------------|
| 1.  | BUSINESS EVENT AWARENESS CONSULTATION                         | 2/8/12  |            |
| 2.  | EMT TRADING SARBANES OXLEY REPORT - RISK MANAGEMENT           | 2/14/12 | <i>9-1</i> |
| 3.  | ST. LUCIE [REDACTED]  | 2/21/12 |            |
| 4.  | REVIEW POST-SAP SOX PROCESS                                   | 2/24/12 |            |
| 5.  | NEXTERA ENERGY HR 2011 SARBANES OXLEY REPORT                  | 2/27/12 |            |
| 6.  | PGD 2011 SOX REPORT - FPL                                     | 2/28/12 |            |
| 7.  | NEXTERA ENERGY 2011 SOX REPORT - E&C                          | 2/28/12 |            |
| 8.  | EMT DAILY FERC NATURAL GAS PRICE REPORTING AUDIT              | 3/1/12  | <i>9-1</i> |
| 9.  | NUC - 2011 SOX REPORT - FPL                                   | 3/1/12  |            |
| 10. | DISTRIBUTION 2011 SOX REPORT                                  | 3/5/12  |            |
| 11. | [REDACTED]  | 3/6/12  |            |
| 12. | REVIEW OF WIRE TRANSFERS TO [REDACTED]                        | 3/6/12  |            |
| 13. | TRANSMISSION 2011 SOX REPORT                                  | 3/6/12  |            |
| 14. | CUSTOMER SERVICE 2011 SOX REPORT                              | 3/7/12  |            |
| 15. | REVIEW OF WHOLESALE BILLING PROCESS FOR TRANSMISSION SERVICES | 3/19/12 | <i>9-1</i> |
| 16. | SOX TESTING 2011 - FPL ACCOUNTING                             | 3/28/12 |            |
| 17. | IM - VENDOR ACCESS PROVISIONING POLICIES & PROCEDURES REV.    | 3/28/12 |            |
| 18. | ISC - ADEQUACY OF PURCHASE ORDER SET-UP PROCESS (FPL)         | 3/30/12 |            |
| 19. | EA - EXTERNAL AFFAIRS CONTRIBUTIONS REVIEW                    | 3/30/12 |            |

*Source: Reg 1 #1*

*9 P. 1*

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2012 (CONT...)  
 PAGE TWO

- |     |  |             |
|-----|--|-------------|
| 20. | HR - NEE 2011 FINANCIAL MATRIX   | 3/30/12     |
| 21. | DISTRIBUTION-CENTRAL MAINTENANCE [REDACTED] <sup>A</sup>                     | 5/2/12      |
| 22. | REVIEW OF DSMS PROGRAM CONTROLS  | 5/7/12      |
| 23. | EMT TARIFF TRADING SYSTEM CONTROLS AUDIT                                     | 5/8/12      |
| 24. | IM - PGD PATCH MANAGEMENT  | 5/16/12     |
| 25. | NUC - EXTENDED POWER UPRATE - 2011 EXPENDITURES REVIEW                       | 5/17/12     |
| 26. | E&C - NEW NUCLEAR PROJECTS - 2011 EXPENDITURES                               | 5/17/12     |
| 27. | IM - IMPLEMENTATION OF USB RESTRICTIONS AUDIT                                | 5/18/12     |
| 28. | WHOLESALE GENERATION BILLING PROCESS AUDIT (EMT)                             | 5/24/12 9-1 |
| 29. | EMT RISK MANAGEMENT NON-SOX PROCESSES AUDIT                                  | 6/7/12 9-1  |
| 30. | JOURNAL ENTRY SAMPLING CONSULTATION  | 6/12/12     |
| 31. | CS - REVIEW OF AMI REMOTE CONNECT SWITCH PROCESSES                           | 6/15/12     |
| 32. | IM - AMI CHANGE MANAGEMENT   | 6/21/12     |
| 33. | IM - IMPLEMENTATION REVIEW OF REMOTE CONTROL SWITCH (RCS)                    | 6/21/12     |
| 34. | IM - [REDACTED] <sup>A</sup> REVIEW  | 6/25/12     |
| 35. | MANATEE POST-IMPLEMENTATION SAP REVIEW                                       | 6/26/12     |
| 36. | EMT NON-SOX CREDIT AUDIT   | 6/27/12     |
| 37. | CABLE REHAB CONTRACT ADMINISTRATION AUDIT                                    | 6/29/12     |
| 38. | DISTRIBUTION CONTRACT ADMIN REVIEW - STORM SECURE<br>POLE INSPECTION PROGRAM | 6/29/12     |
| 39. | IM - [REDACTED] <sup>A</sup> AND [REDACTED] <sup>B</sup>                     | 6/29/12     |

9 p. 7



CONFIDENTIAL

- |     |  |                        |
|-----|--|------------------------|
| 40. | SCC UPGRADE PROJECT - NERC CIP COMPLIANCE REVIEW (EMS)                             | 7/10/12                |
| 41. | IM - AMI/SMART GRID RISK ASSESSMENT  | 7/11/12                |
| 42. | [REDACTED]   | 7/17/12                |
| 43. | [REDACTED]   | 8/8/12                 |
| 44. | [REDACTED]   | 8/15/12                |
| 45. | SOX 07.18.00 NEPM - FPL CONTRACTS -<br>LEGAL REVIEW OF NETTING FLAGS - EMT         | 8/24/12                |
| 46. | [REDACTED]   | 9/10/12                |
| 47. | REVIEW OF SOLAR REBATE PROGRAM CONTROLS  | 9/10/12 <i>lliana</i>  |
| 48. | REVIEW OF FAILOVER PROCESSES AT LFO  | 9/12/12                |
| 49. | REVIEW OF WMS DISTRIBUTION CAP/O&M SPLITS  | 9/12/12                |
| 50. | REVIEW OF [REDACTED] <sup>A</sup> MONITORING<br>PROCESS AT [REDACTED] <sup>B</sup> | 9/12/12                |
| 51. | REVIEW OF [REDACTED] <sup>A</sup> AT LFO   | 9/12/12                |
| 52. | [REDACTED] <sup>A</sup> VENDOR AUDIT   | 9/13/12                |
| 53. | SANFORD SERVICE CENTER [REDACTED] <sup>A</sup>                                     | 9/13/12                |
| 54. | REVIEW [REDACTED] <sup>A</sup> AT LFO  | 9/21/12                |
| 55. | [REDACTED] <sup>A</sup> PHYSICAL SECURITY AUDIT                                    | 9/28/12                |
| 56. | CHANGE MGT REVIEW OF DISTRIBUTION FIXED ASSETS SYSTEM                              | 10/17/12               |
| 57. | NET METERING REPORTING PROCESS REVIEW  | 10/18/12 <i>lliana</i> |
| 58. | FAS 161 CONSULTATION   | 10/23/12               |
| 59. | [REDACTED] <sup>A</sup> TRANSACTIONS AUDIT   | 10/29/12               |
| 60. | CUSTOMER NON-PUBLIC INFORMATION (NPI) DATABASE REVIEW                              | 11/5/12                |

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61.	RISK IDENTIFICATION AT [REDACTED]	11/14/12
62.	FT. LAUDERDALE PLANT BUSINESS PROCESS FOLLOW-UP REVIEW	11/16/12
63.	REVIEW OF FRCC BILLING FOR RC AGENT FUNCTIONS	11/28/12
64.	REVIEW OF SaaS SECURITY PRACTICES	12/5/12
65.	CORPORATE CHANGE MANAGEMENT CONSULTATION	12/10/12
66.	CORPORATE FIREWALL MGMT PROGRAM REVIEW	12/10/12
67.	REVIEW OF VEHICLE RENTAL EXPENSE REPORTING PROCESS	12/11/12
68.	BROWARD TRANSMISSION SERVICE CENTER ADMIN REVIEW	12/12/12
69.	AMI [REDACTED] REVIEW	12/13/12
70.	IM VULNERABILITY IDENTIFICATION PROCESS	12/13/12
71.	REVIEW OF EAMS KEY CIP AUTOMATED CONTROLS	12/14/12
72.	DISTRIBUTION JOB ORDER CLOSING PROCESS REVIEW	12/14/12
73.	[REDACTED]	12/14/12
74.	PRIVILEGED - ADDITIONAL FPL CONTRACT WORKERS PER DIEM ELIGIBILITY REVIEW	12/20/12
75.	T&E DATA ANALYTICS SUMMARY	12/31/12
76.	DIRECT ASSISTANCE DELOITTE	12/31/12

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 9-1

[Pages 1 through 3]

Internal Audit





DAILY ENERGY PAYMENT SUMMARY


Title Daily Energy Pmt Summary *Ka*  
*3/14/13*

*103C*

Facility Name: BROWARD RESOURCE RECOVERY SOUTH

Report Month :

Date	A	B
	Energy (MWH)	Payment (\$)
1 07/01/12		
2 07/02/12		
3 07/03/12		
4 07/04/12		
5 07/05/12		
6 07/06/12		
7 07/07/12		
8 07/08/12		
9 07/09/12		
10 07/10/12		
11 07/11/12		
12 07/12/12		
13 07/13/12		
14 07/14/12		
15 07/15/12		
16 07/16/12		
17 07/17/12		
18 07/18/12		
19 07/19/12		
20 07/20/12		
21 07/21/12		
22 07/22/12		
23 07/23/12		
24 07/24/12		
25 07/25/12		
26 07/26/12		
27 07/27/12		
28 07/28/12		
29 07/29/12		
30 07/30/12		
31 07/31/12		
32 Monthly Total	21,769.1835 <i>(A) p3</i>	622,300.65 <i>(B) p3</i>

33 Average Cost : 18.04 \$/MWH  
34 Maximum Energy :  C  
35 Execution Date/Time : 08/15/12 at 13:58:43

*X traced to daily calculation*  
*Source: Reg B*

*481*  
*1-1p2*

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 48-1/1-1

[Pages 3 through 5]

Backup Wheelabrator

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-1

[Pages 1 through 21]

Bay Gas Storage



**THIRD REVISED  
EXHIBIT C**

**JUSTIFICATION TABLE**

THIRD REVISED EXHIBIT C

COMPANY: Florida Power & Light Company  
 TITLE: List of Confidential Workpapers  
 AUDIT: FPL Fuel Audit  
 AUDIT CONTROL NO: 13-016-4-1  
 DOCKET NO: 20180001-EI  
 DATE: October 4, 2018

Bold denotes revision to reduce the amount of confidential classification previously requested

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
9	Internal Audit	4	Y	Pg. 1, Lns. 3A, 11, 12A  Pg. 2, Lns. 21A, 34A, 39A, 39B  Pg. 3, Lns. 42, 43, 44, 46, 50A, 50B, 51A, 52A, 53A, 54A, 55A, 59A  Pg. 4, Lns. 61A, 69A, 73	(b)	A. Maceo
9-1	Internal Audit	3	Y	ALL	(b)	A. Maceo
9-3	External Audits	12	N			
42-1/1	LFARS	2	N			
42-1/2	LFARS	2	N			
42-1/3	LFARS	2	N			
42-1/4	LFARS	2	N			
42-1/5	LFARS	2	N			
42-1/6	LFARS	2	N			
42-1/7	LFARS	2	N			
42-1/8	LFARS	2	N			
42-1/9	LFARS	2	N			
42-1/10	LFARS	2	N			
42-1/11	LFARS	2	N			
42-1/12	LFARS	2	N			
42-2	Reconciliation	3	N			
42-2/1	Fossil Fuel Inventory	12	N			
42-2/2	Form 423 – Oil	12	N			
42-2/2-1	Oil	3	N			
42-2/3	Form 423 – Coal	12	N			
42-2/4	Form 423 – Coal	12	N			
42-2/4-1	Coal – Scherer	12	N			
42-2/5	Coal – SJRPP	14	N			
42-3	Form 423	5	N			
43-3/2	<b>Sample Testing</b>	4	N			
43-3/2-1	Sample Testing	4	N			
43-3/3	<b>Sample Testing</b>	4	N			
43-3/4	<b>Sample Testing</b>	4	N			
43-3/4-1	Sample Testing	3	N			
43-3/5	<b>Sample Testing</b>	4	N			
43-3/6	<b>Sample Testing</b>	4	N			
43-3/7	<b>Sample Testing</b>	4	N			
43-3/8	<b>Sample Testing</b>	4	N			
43-3/9	<b>Sample Testing</b>	4	N			
43-3/10	<b>Sample Testing</b>	3	N			
43-3/11	<b>Sample Testing</b>	4	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
43-3/12	Sample Testing	3	N			
43-3/13	Sample Testing	3	N			
44-2	SJRPP Coal	2	N			
44-2/1	SJRPP Coal	3	N			
44-2/2	SJRPP Coal	2	N			
44-2/2-1	SJRPP Coal	2	N			
44-3	SJRPP Coal	3	N			
44-3/1	SJRPP Coal	1	N			
44-3/1-1	SJRPP Coal	2	N			
44-3/2	SJRPP Coal	1	N			
45-1	Vendor Rebates	14	N			
45-1/1	Vendor Rebates	2	N			
46-1 p3	Transportation	1	N			
46-1/1	Lambda	1	N			
46-1/2	Lambda	7	N			
46-1/3	Lambda	6	N			
46-1/4	Lambda	2	N			
46-1/5	Lambda	1	N			
46-3	Estimated Transmission	1	N			
46-3/1	Estimated Transmission	1	N			
46-3/1-1	Oasis	8	N			
47-1/1	True-up	1	N			
47-1/1-1	May bill	1	N			
47-1/1-2	May bill	1	N			
47-1/1-2/1	May bill JEA backup	1	N			
47-1/1-2/1-1	FPL saleback	1	N			
47-1/1-2/2	JEAs Estimate	1	N			
47-1/1-3	JEAs Estimate non fuel	1	N			
47-1/1-4	Actual costs	1	N			
47-1/2	June bill	1	N			
47-1/2-1	non-fuel June	1	N			
47-1/2-2	JEAs fuel June	1	N			
47-1/3	True-up	1	N			
47-1/3-1	Recap	2	N			
47-1/3-1/1	Transportation	1	N			
47-1/3-1/1-1	Imbalance	1	N			
47-1/3-1/1-2	Deals	3	N			
47-1/3-1/1-3	Transportation Rates	1	N			
47-1/3-2/2	Transmission summary	1	N			
47-1/3-2/2-1	Capacity	1	N			
47-1/3-2/2-1/1	Capacity approved	1	N			
47-1/3-2/2-1/2	Capacity approved	1	N			
47-1/3-2/2-2	Invoice	1	N			
47-1/3-2/2-3	Invoice	1	N			
47-1/3-2	PPA	2	N			
47-1/3-3	May Estimate	1	N			
47-2	Audit Notes	2	N			
48-1/1	True-up	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
48-1/1-1	Backup Wheelabrator	6	N Y Y N	Pg. 1 Pg. 2, Cols. A-B, Lns. 1-31; Line 34C Pgs. 3-5, ALL Pg. 6	(d)	G. Yupp
48-1/1-2	Backup Solid Waste	7	N			
48-1/1-3	Backup Indiantown	6	N			
48-1/1-3/1	QF filling statement backup	1	N			
48-1/1-3/2	Daily statement	2	N			
48-1/1-3/2-1	ICL cost calculation	1	N			
48-1/2	Unit Energy cost calculation	2	N			
48-1/2-1	% calculation	1	N			
48-1/2-1/1	Monthly costs	1	N			
48-1/2-1/2	Components of Actual Energy Cost	1	N			
48-1/2-2	Contract	24	N			
48-1/2-3	8.4 calculation	2	N			
49-1/1	Long Term Purchases	3	N			
49-1/1-1/1	Long Term Purchases	2	N			
49-1/1-2	Long Term Purchases	1	N			
49-1/1-2/1	Long Term Purchases	1	N			
49-1/1-3	Long Term Purchases	1	N			
49-1/1-4	Long Term Purchases	1	N			
49-1/1-4/1	Long Term Purchases	3	N			
50-1	Bay Gas Storage	21	Y	ALL	(d)	G. Yupp
50-2/1	Bay Gas Storage	2	N			
50-2/1-1	Bay Gas Storage	3	N			
50-2/2	Bay Gas Storage	2	N			
50-2/2-1	Bay Gas Storage	3	N			
52-1	Florida Gas Transmission	3	N			
52-1/1	Florida Gas Transmission	2	N			
52-1/1-1	Florida Gas Transmission	19	N			
52-1/2	Florida Gas Transmission	1	N			
52-1/2-1	Florida Gas Transmission	4	N			



**THIRD REVISED  
EXHIBIT D**

**DECLARATIONS**

**THIRD REVISED EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchase Power Cost Recovery  
Clause with Generating Performance Incentive Factor

Docket No. 20180001-EI

**DECLARATION OF GERARD J. YUPP**

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading Division. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Third Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 13-016-4-1. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data such as pricing and other terms, and vendor and supplier rates. Specifically, the documents include information related to the purchase and sale of energy and capacity, as well as the purchase of natural gas and natural gas storage. The disclosure of this information would impair the efforts of FPL to contract on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. 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-17-0126-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 36 months or until retention of this information by the Commission is no longer necessary. 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.

  
\_\_\_\_\_  
GERARD J. YUPP

Date: 9/24/18

**THIRD REVISED EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchase Power Cost Recovery  
Clause with Generating Performance Incentive Factor

Docket No: 20180001-EI

**DECLARATION OF ANTONIO MACEO**

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

2. I have reviewed the documents referenced and incorporated in FPL's Third Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 13-016-4-1 for which I am designated as the declarant. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, contain or constitute internal auditing controls, reports or notes of internal auditors, or information relating to internal auditing reports issued in 2012. 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. Nothing has occurred since the issuance of Order No. PSC-17-0126-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 36 months or until retention of this information by the Commission is no longer necessary. 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: \_\_\_\_\_

9/24/18