

In re: Review of Florida Power & Light
Company's Internal Audit Function

Docket No: 20160057-EI

Date: July 8, 2019

**FLORIDA POWER & LIGHT COMPANY'S SECOND REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT REPORT PA-15-10-006**

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 Report PA-15-10-006 ("Confidential Information"). In support of this request, FPL states as follows:

1. On March 10, 2016, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("May 21, 2015 Request"). By Order No. PSC-16-0152-CFO-EI, dated April 19, 2016 ("Order 0152"), the Commission granted FPL's March 10, 2016 Request. FPL adopts and incorporates by reference the March 10, 2016 Request and Order 0152.

2. On October 18, 2017, FPL filed a First Request for Confidential Classification of the Confidential Information, which included Exhibit D ("October 18, 2017"). By Order No. PSC-2018-0029-CFO-EI, dated January 9, 2018 ("Order 0029"), the Commission granted FPL's October 18, 2017 Request. FPL adopts and incorporates by reference the October 18, 2017 and Order 0029.

3. The period of confidential treatment granted by Order 0029 will soon expire. The Confidential Information that was the subject of FPL's October 18, 2017 Request and Order 0029 warrants continued treatment as proprietary and confidential

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

4. All of the information designated in Exhibits A, B and C to the March 10, 2016 Request remain confidential. Accordingly, those exhibits will not be reproduced or reattached here.

5. Included as Second Revised Exhibit D is the declaration of Antonio Maceo in support of this request.

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 further detailed in the declaration included as Second Revised Exhibit D, certain documents contain information concerning internal auditing controls and reports of internal auditors. This information is protected by Section 366.093(3)(b), 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 eighteen (18) 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 affidavits 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/ Kevin I.C. Donaldson
Kevin I.C. Donaldson
Florida Bar No. 833401

CERTIFICATE OF SERVICE
Docket No. 20160057-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic mail on this 8th day of July, 2019 to the following:

David Rich
Office of Auditing & Performance Analysis
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
drich@psc.state.fl.us

By: /s/ Kevin I.C. Donaldson
Kevin I.C. Donaldson
Florida Bar No. 833401

SECOND REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Florida Power & Light
Company's Internal Audit Function

Docket No: 20160057-EI

STATE OF FLORIDA)
)
COUNTY OF MIAMI-DADE)

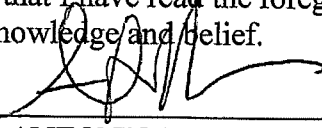
WRITTEN DECLARATION OF ANTONIO MACEO

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 written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification of Information Obtained in Connection with Audit Report No. PA-15-10-006. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute internal auditing controls, processes, reports or notes of internal auditors, or information relating to internal auditing reports issued between 2010 - 2015. 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, controls 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. Additionally, the documents and materials that I have reviewed also include information relating to standard hourly internal auditor rates used to determine audit cost. Public disclosure of this information would impair FPL's competitive business. 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 a 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: 7/4/19