



Jessica Cano
Attorney
Florida Power & Light Company
700 Universe Boulevard
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(561) 304-5226
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July 16, 2009

VIA HAND DELIVERY

Ms. Ann Cole
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

RECEIVED-FPSC
09 JUL 16 PM 4:51
COMMISSION
CLERK

Re: Docket No. 090009-EI; Nuclear Power Plant Cost Recovery Clause

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") are an original and seven (7) copies of its Request for Confidential Classification regarding materials provided to Staff pursuant to its audit titled Florida Power & Light's Project Management Internal Controls for Nuclear Uprate and Constructions Projects. The original includes Exhibit A through D.

Exhibit A consists of the confidential documents, and all information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C consists of FPL's justification for its Request for Confidential Classification. Exhibit D consists of the affidavits of Rajiv Kundalkar and Steve Scroggs in support of FPL's Request for Confidential Classification. Also included in this filing is a compact disc containing FPL's Request for Confidential Classification and Exhibit C only in Microsoft Word format.

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

Sincerely,
Jessica Cano
Jessica A. Cano

Enclosures
cc: Parties of Record (w/out exhibits)

COM _____
ECR 2
GCL 1+CD
OPC _____
RCP 3
SSC _____
SGA _____
ADM _____
CLK 1

DOCUMENT NUMBER-DATE

07223 JUL 16 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant)
Cost Recovery Clause)

Docket No. 090009-EI
Filed: July 16, 2009

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO PROJECT MANAGEMENT AUDIT**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to its audit titled Florida Power & Light's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects ("the Audit"). In support of its request, FPL states as follows:

1. During the Audit, Staff was provided with various confidential documents. By letter dated June 25, 2009, Staff indicated its intent to retain certain confidential documents as audit work papers and provided a draft audit report. Pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the work papers and draft audit report. Accordingly, FPL is filing this Request for Confidential Classification to maintain continued confidential handling of these items.

2. The following exhibits are included with and made a part of this request:

a. Exhibit A includes a copy the confidential documents, on which all information that is entitled to confidential treatment under Florida law has been highlighted.

b. Exhibit B consists of redacted versions of the confidential documents. If the entirety of a document is confidential, a page has been included indicating that the

document is confidential, as no purpose would be served by providing copies of each page in redacted form. If only a portion of a document is confidential, a copy of the document is included with only the confidential portion(s) redacted.

c. Exhibit C is a table containing the specific line and page references to the confidential materials for which confidential treatment is sought, and references to the specific statutory basis or bases for the claim of confidentiality and to the affidavit in support of the requested classification.

d. Exhibit D includes the affidavits of Rajiv Kundalkar and Steven Scroggs.

4. FPL submits that the highlighted information in Exhibit A is proprietary 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, 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.

5. As the affidavits included in Exhibit D indicates, certain information provided by FPL contains information related to internal auditing controls or reports of internal auditors. This information is protected from public disclosure pursuant to Section 366.093(3)(b), Florida Statutes. Certain materials contain information related to bids or contractual data, such as pricing or other terms, the public disclosure of which would violate nondisclosure terms 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 by Section 366.093(3)(d), Florida

Statutes. Additionally, this and other information relates to competitive interests, and could impair the competitive business of the provider of the information. Such information is protected by Section 366.093(3)(e), Florida Statutes.

6. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (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 more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

Bryan S. Anderson, Managing Attorney
Fla. Auth. House Counsel No. 219511
Jessica A. Cano
Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5226
Facsimile: (561) 691-7135

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

**CERTIFICATE OF SERVICE
DOCKET NO. 090009-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing, without attachments, was served by hand delivery* or U.S. mail this 16th day of July, 2009, to the following:

Keino Young, Esq.*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

J. R. Kelly, Esq.
Joseph McGlothlin, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399

J. Michael Walls, Esq.
Dianne M. Triplett, Esq.
Carlton Fields Law Firm
P.O. Box 3239
Tampa, Florida 33601-3239

R. Alexander Glenn, Esq.
John T. Burnett, Esq.
Progress Energy Service
Company, LLC
P.O. Box 14042
St. Petersburg, Florida 33733-4042

John W. McWhirter, Jr., Esq.
Davidson, McWhirter PA
Attorneys for FIPUG
P.O. Box 3350
Tampa, Florida 33601

Mr. Paul Lewis, Jr.
106 East College Ave., Suite 800
Tallahassee, FL 32301-7740

Jon C. Moyle and Vicki Kaufman
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118 N. Gadsden St.
Tallahassee, FL 32301

E. Leon Jacobs, Jr.
Williams & Jacobs, LLC
Counsel for SACE
1720 S. Gadsden St. MS 14
Suite 201
Tallahassee, Florida 32301

James W. Brew, Esq.
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201


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

EXHIBIT C

Exhibit C

Florida Power and Light Company

Title: List of Confidential Workpapers

Re: Florida Power & Light's Project Management Internal Controls
for Nuclear Plant Uprate and Construction Projects

Docket No. 090009 EI

Work Paper no.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statue 366.093 (3) Subsection	Affiant
Work Plan-PTN	Work Plan For Nuclear Uprate and New Construction - PTN	23	Y	Page 10, Page 12 Paragraph 1, Page 13 Paragraphs 1, 3, Page 18 Paragraph 1, Page 19 Paragraph 2	(b), (d), (e)	Steven D. Scroggs
Work Plan-EPU	Work Plan For Nuclear Uprate and New Construction – EPU	22	Y	Page 10 Paragraphs 1, Page 18 Paragraph 1	(b), (d), (e)	Rajiv S. Kundalkar
DR-1	Document Summary Log	15	Y	Page 2 Section 1, Page 3, Page 4 Sections 1 and 3, Page 8 Section 1, Page 9 Section 1, Page 10 Section 1, Page 11 Section 1, Page 12, Page 13 Sections 1, 2 and 3, Page 14 Section 1	(d), (e)	Steven D. Scroggs
DR-1	Document Summary Log	24	Y	Page 3 Sections 1, 2, and 3, Page 4 Lines 1- 24, Page 5 Line 1, Page 14 Section 1, Page 18 Section 1, Page 19 Section 1, Page 23 Section 1	(d), (e)	Rajiv S. Kundalkar & Steven D. Scroggs
DR-2	Document Summary Log	6	Y	Page 5, Section 1,	(d), (e)	Steven D. Scroggs

Work Paper no.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statue 366.093 (3) Subsection	Affiant
				Page 6 Section 1		
DR-6	Document Summary Log	5	N			
DR-7	Document Summary Log	3	Y	Page 1 Line 1, Page 3 Sections 1 and 2	(d), (e)	Rajiv S. Kundalkar
DR-8	Document Summary Log	7	Y	Page 2 Section 1, Page 3 Section 1, Page 4, Page 5 Section 1	(b), (e)	Rajiv S. Kundalkar
DR-9	Document Summary Log	5	Y	Page 1 Section 1, Page 2 Section 1, Page 3 Section 1, Page 4 Section 1	(d), (e)	Rajiv S. Kundalkar
DR -10	Document Summary Log	6	Y	Page 1 Lines 1 and 2, Page 2 Lines 1 and 2, Page 3 Lines 1, 2, and 3, Page 4 Sections 1 and 2, Page 5	(b), (d), (e)	Rajiv S. Kundalkar & Steven D. Scroggs
DR-11	Document Summary Log	3	Y	Page 2 Line 1, Page 3 Section 1	(d), (e)	Rajiv S. Kundalkar
IVS-1	PSL Uprate Overview and Tour	2	N			
IVS-2	PTN 6&7 Status Overview and Project Discussion Session	3	Y	Page 1, Lines 1, 2	(d), (e)	Steven D. Scroggs
IVS-3	PTN 6&7 Controls Group	2	Y	Page 1 Sections 1-4	(d), (e)	Steven D. Scroggs
IVS-4	PTN 6&7 Contracts Group	1	N			
IVS-5	New Nuclear and EPU Transmission Studies & Assessments	1	N			
IVS-6	PTN 6&7 Oversight Plan	2	Y	Page 1 Sections 1-5	(d), (e)	Steven D. Scroggs
IVS-7	Internal Audit Review	1	Y	All	(b), (d), (e)	Soria Talbot
IVS-8	EPU Juno Directors	1	N			
IVS-9	Staffing Audit	2	Y	All	(b), (d), (e)	Rajiv S.

Work Paper no.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statue 366.093 (3) Subsection	Affiant
	discussion					Kundalkar
IVS-10	COLA	2	Y	Page 1 Sections 1 and 2, Page 2 Section 1	(d), (e)	Steven D. Scroggs
IVS-11	Turkey Point 6&7 Status	2	Y	Page 1 Section 1, Page 2 Section 1	(d), (e)	Steven D. Scroggs
IVS-12	ISC's Role in Procurement	1	Y	Page 1 Sections 1 and 2	(d), (e)	Steven D. Scroggs
IVS-13	FPL Uprate and New Units Progress and Challenges	1	N			
IVS-14	EPU Project Update	2	N			
Chart 1	Bechtel COLA Contract Changes	1	Y	Page 1 Columns 2-4	(d), (e)	Steven D. Scroggs
Chart 2	EPU Contracts Executed to Date	1	Y	Page 1 Columns 5-8	(d), (e)	Rajiv S. Kundalkar
Chart 3	EPU Competitively Bid Contracts Greater than \$1M	1	Y	Page 1 Columns 2-4	(d), (e)	Rajiv S. Kundalkar
Chart 4	PTN Competitively Bid Contracts Greater than \$1M	1	Y	Page 1 Columns 2-5	(d), (e)	Steven D. Scroggs
Chart 5	PTN Contracts Executed to Date	1	Y	Page 1 Columns 5-9	(d), (e)	Steven D. Scroggs
Chart 6	EPU-PTN Single/Sole Source Contracts Greater than \$1M	2	Y	Pages 1-2 Columns 2-5	(d), (e)	Rajiv S. Kundalkar & Steven D. Scroggs
Chart 7	EPU Total Contracts	1	Y	Page 1 Columns 3-8	(d), (e)	Rajiv S. Kundalkar
DR 1.18	RFP's and Bid Evaluation summary Sheets EPU-PTN	CD	Y	Entire CD	(d), (e)	Rajiv S. Kundalkar & Steven D. Scroggs
DR 1.42	Written response to Data Request: Westinghouse Letter: Reservation Agreement	8	Y	Pages 2-8	(d), (e)	Steven D. Scroggs
DR 1.43	PTN-Projected Contracts to be executed in 2008	3	Y	Page 3 Columns 4-5	(d), (e)	Steven D. Scroggs
DR 1.44	PTN-Contracts greater than \$100K executed since 4/08	3	Y	Page 3 Columns 4, 6-8	(d), (e)	Steven D. Scroggs

Work Paper no.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statue 366.093 (3) Subsection	Affiant
DR 1.46	PTN Contracts executed	CD	Y	Entire CD	(d), (e)	Steven D. Scroggs
DR 1.49	Bechtel Recovery Plan Letter: Hydrology Delays Letter: Retarget Letter	24	Y	All	(d), (e)	Steven D. Scroggs
DR 1.53	Westinghouse Audit VA 0811: Bechtel Audit: Surveillance Reports	227	Y	All	(e)	Steven D. Scroggs
DR 1.3	EPU Risk Capture Tools and Risk Matrix	127	Y	All	(e)	Rajiv S. Kundalkar
DR 1.5	PSL & PTN Risk Matrix	20	Y	All	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Executive Presentation	28	Y	Pages 5, 9, 17-20, 22-28	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Bi-Weekly Report 11/24/08	21	Y	Pages 4-6, 12-16	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Bi-Weekly Report 12/08/08	19	Y	Pages 3, 8-13	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Bi-Weekly Report 11/10/08	45	Y	Pages 3, 6, 8-9, 17-20, 23-27, 39-44	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Executive Meeting, 05/16/08	25	Y	Pages 5, 9, 17-21, 23	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Executive Meeting, 06/25/08	29	Y	Pages 6, 10, 20, 22-25, 27-28	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Executive Meeting, 07/31/08	35	Y	6, 10, 23-26, 29-32, 34, 35	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Executive Meeting, 10/01/08	23	Y	6, 10, 19-23	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Executive Meeting, 11/13/08	23	Y	Pages 6, 10, 16, 19-23	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Technical Meeting 04/14/08	26	Y	Pages 4-9, 18-19, 21	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Technical Meeting 07/15/08	20	Y	Pages 5, 14-17, 19	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Technical Meeting 12/12/08	16	Y	Pages 5, 6, 13-16	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Steering Committee 05/14/08	15	Y	Pages 4, 10, 11-12, 14	(e)	Rajiv S. Kundalkar
DR 1.10	EPU Steering Committee 06/16/08	18	Y	Pages 5, 14-15, 17	(e)	Rajiv S. Kundalkar
DR 1.12	PSL & PTN Engineering Schedule: PSL &	14	Y	All	(e)	Rajiv S. Kundalkar

Work Paper no.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statue 366.093 (3) Subsection	Affiant
	PTN Mod. Schedule: EPU Summary Cash Flow and Actual Costs Jan 09					
DR 1.13	St. Lucie & Turkey Point EPU Licensing & Engineering Schedules and BOP analysis for LAR	CD	Y	Entire CD	(e)	Rajiv S. Kundalkar
DR 1.30	Risk Committee Meeting Minutes	4	Y	Page 3 Line 10	(e)	Steven D. Scroggs
DR 1.30	PTN Risk Committee Presentation 06/25/08	35	Y	All	(e)	Steven D. Scroggs
DR 1.33	Westinghouse China Update	26	Y	All	(e)	Steven D. Scroggs
DR 1.40	COLA schedule: BVZ Engineering Schedule	179	Y	All	(e)	Steven D. Scroggs
DR 1.45	Generation Interconnection Facilities Study	25	Y	Pages 4-25	(e)	Steven D. Scroggs
DR 2.1a EPU	MOPR Jan 08 – Mar 09	14	Y	Page 5 Line 7, Page 6 Line 7, Page 11 Line 7, Page 12 Lines 6-7, Page 13 Line 7	(e)	Rajiv S. Kundalkar
DR 2.1c-f, i, j EPU	Steering Committee Reports, Monthly Operating Reports, Bi-Weekly Updates, Weekly Compliance Matrix	CD	Y	All	(e)	Rajiv S. Kundalkar
DR 2.1 PTN	Risk Committee Meeting Minutes, AP-1000 update, Schedule and Cost Estimate Data. Team Meeting Reports, etc.	CD	Y	All	(e)	Steven D. Scroggs
DR 2.1 PTN	Dashboards – PTN	14	Y	Page 1 Section 1, Page 2 Section 2, Page 5 Sections 1-2,	(d), (e)	Steven D. Scroggs

Work Paper no.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statue 366.093 (3) Subsection	Affiant
				Page 7 Section 1, Page 8 Section 1-2, Page 9 Section 1-2, Page 10 Section 1, Page 11 Section 1, Page 12 Section 1, Page 13 Sections 1-3, Page 14 Sections 1-4		
DR 2.4	EPC Contract Evaluations	37	Y	All	(d), (e)	Rajiv S. Kundalkar
DR 2.7	FPL Presentation (BOP Engineering Firm) & BVZ Single Source Justification	14	Y	All	(d), (e)	Steven D. Scroggs
DR 2.8	Westinghouse Sole Source Justification Memo, Reservation Agreement, & Forgings list for AP 1000 Unit	7	Y	All	(d), (e)	Steven D. Scroggs
DR 6-Tab 2	Milestones: EPU Work Scope Modifications: Bechtel Integration Plan: Site Project Plan:	6	Y	All	(d), (e)	Rajiv S. Kundalkar
DR 6-Tab 5	EPU Indicators	148	Y	All	(e)	Rajiv S. Kundalkar
DR 6-Tab 6	0900 Morning Call	18	Y	All	(e)	Rajiv S. Kundalkar
DR 6-Tab 10	Bid Process	2	Y	All	(e)	Rajiv S. Kundalkar
DR 6-Tab 11	TEI Contract Compliance Matrix	3	Y	All	(d), (e)	Rajiv S. Kundalkar
DR 6-Tab 12	Vendor Strategy	2	Y	All	(d), (e)	Rajiv S. Kundalkar
DR 7.2	Summary of Scope	1	Y	Page 1 Columns 4, 5	(d), (e)	Rajiv S. Kundalkar
DR 7.5	Q A plan	59	Y	All	(e)	Rajiv S. Kundalkar
DR 7.7	Table of Outage EPU	1	Y	All	(e)	Rajiv S. Kundalkar
DR 7.9	Vendor Recovery	CD	Y	Entire CD	(d), (e)	Rajiv S.

Work Paper no.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statue 366.093 (3) Subsection	Affiant
	Plans, Monthly Reports, Meeting Minutes					Kundalkar
DR 8.1	Project Feasibility Studies	CD	Y	Entire CD	(d), (e)	Rajiv S. Kundalkar
DR 8.2	Pre-determined Source Designations	17	Y	Pages 3-17	(e)	Steven D. Scroggs
DR 8.5	Audit Responses	4	Y	All	(b), (e)	Rajiv S. Kundalkar
DR 8.7	Gantry Crane	12	Y	Pages 5-10	(e)	Rajiv S. Kundalkar
DR 9.2	GSU Transformer Design Study	2	Y	All	(e)	Rajiv S. Kundalkar
DR 9.3	Risk Matrix	17	Y	All	(e)	Rajiv S. Kundalkar
DR 9.6	PSL-PTN EPC Cost Estimate Summary	1	Y	All	(e)	Rajiv S. Kundalkar
DR 9.7	FPL & Bechtel KPI's for the EPU EPC Project: Bechtel Procedures and Project Controls	CD	Y	Entire CD	(d), (e)	Rajiv S. Kundalkar
DR 9.8	Bechtel Job No. 28486 and 25489 QA Program Plans	33	Y	All	(d)	Rajiv S. Kundalkar
DR 10.1	Procurement Policies: NP 1100, GO#705, GO #705.1, GO #705.3, GO #705.9	31	N			N/A
DR 10.2	Single Source Justification to Westinghouse for the Rod Control	2	Y	All	(d), (e)	Rajiv S. Kundalkar
DR 10.4	FPLE Purchase Order #296137	3	Y	All	(d)	Rajiv S. Kundalkar
DR 10.6	Bechtel Change Orders for PO #4500395492, Comensura PO#4500350496 contract, & Ecological PO#4500421409 contract	CD	Y	Entire CD	(d), (e)	Steven D. Scroggs
DR 10.7	Staff Augmentations, TSSD Billing Rates & Guidant Hourly	CD	Y	Entire CD	(d), (e)	Rajiv S. Kundalkar

Work Paper no.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
	Rates					
DR 11.1	Contract Deviation Logs	11	Y	Page 1 Columns 5-9, Page 3 Columns 5-9, Page 4 Columns 5-6, Page 5 Columns 5-9, Page 6 Columns 6, 14, Page 7 Columns 6-10, Page 8 Columns 7-12, Page 9 Columns 7-12, Page 10 Columns 6-10, Page 11 Columns 6-10	(d), (e)	Rajiv S. Kundalkar
DR 11.2	Condition Reports	13	Y	All	(e)	Rajiv S. Kundalkar
Internal Controls Report	FPL Project Management Internal Controls for Nuclear Uprate and Construction Project	46	Y	Page 7 Section 1, Page 12 Sections 1-11, Page 13 sections 1-5, Page 15 Section 1, Page 16 Section 1, Page 29 Sections 1-3, Page 31 Sections 1-3, Page 34 Sections 1-5, Page 35 Section 1, Page 42 Sections 1-4, Page 43 Columns 1-3 and Sections 1-2, Page 44 Columns 1-3 and Sections 1-8, Page 45 Columns 1-3 and Sections 1-3, Page 46 Columns 1-3 and Sections	(b), (d), (e)	Rajiv S. Kundalkar & Steven D. Scroggs

Work Paper no.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				1-5		

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Nuclear Power Plant Cost Recovery)
Clause – Review of Nuclear Controls for Cost Recovery) DOCKET NO. 090009-EI

STATE OF FLORIDA)
) AFFIDAVIT OF STEVEN D. SCROGGS
PALM BEACH COUNTY)


BEFORE ME, the undersigned authority, personally appeared Steven D. Scroggs who, being first duly sworn, deposes and says:

1. My name is Steven D. Scroggs. I am currently employed by Florida Power & Light Company (“FPL”) as Senior Director, Project Development. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in FPL’s Request for Confidential Classification of Information Obtained in Connection with the Review of Florida Power & Light’s Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects, for which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed are proprietary confidential business information, consisting of bids or other contractual data related to specific vendors, and information related to competitive interests. Disclosure of this information would violate FPL’s contract with its vendors and/or impair FPL’s efforts to enter into contracts on commercially favorable terms, and could harm the competitive business of the provider of the information. 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. Affiant says nothing further.


Steven D. Scroggs

SWORN TO AND SUBSCRIBED before me this 15 day of July 2009, by Steven D. Scroggs, who is ~~personally known to me~~ or who has produced _____ (type of identification) as identification and who did take an oath.


Notary Public, State of Florida

My Commission Expires: 5/29/2012



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost)
Recovery Clause- Review of Nuclear Controls for Cost Recovery) DOCKET NO. 090009-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY) **AFFIDAVIT OF SORIA TALBOT**

BEFORE ME, the undersigned authority, personally appeared Soria Talbot who, being first duly sworn, deposes and says:

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

2. I have reviewed Exhibit C and the documents that are included in FPL's Request for Confidential Classification of information obtained in connection with the Review of Florida Power & Light's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed contain information related to internal auditing controls or reports of internal auditors. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

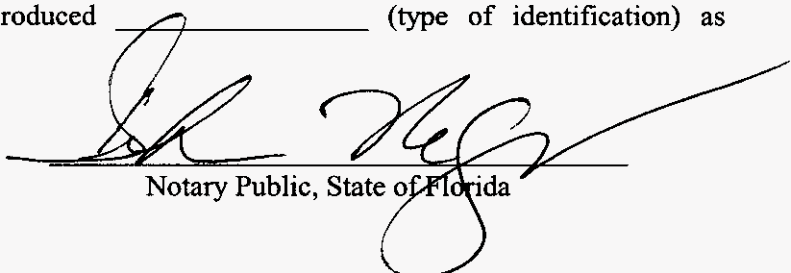
3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.



Soria Talbot

~~SWORN TO AND SUBSCRIBED~~ before me this 15th day of July, 2009, by Soria Talbot, who is personally known to ~~me~~ or who has produced _____ (type of identification) as identification and who did take an oath.



Notary Public, State of Florida

My Commission Expires:

NOTARY PUBLIC-STATE OF FLORIDA
Debra A. Neger
Commission #DD679070
Expires: JULY 10, 2011
BONDED THRU ATLANTIC BONDING CO., INC.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost Recovery)
Clause- Review of Nuclear Controls for Cost Recovery) DOCKET NO. 090009-EI

STATE OF FLORIDA)
) AFFIDAVIT OF RAJIV S. KUNDALKAR
PALM BEACH COUNTY)

BEFORE ME, the undersigned authority, personally appeared Rajiv S. Kundalkar who, being first duly sworn, deposes and says:

1. My name is Rajiv S. Kundalkar. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Nuclear Power Uprate. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in FPL's Request for Confidential Classification of information obtained in connection with the Review of Florida Power & Light's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects, for which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed are proprietary confidential business information, consisting of bids or other contractual data related to specific vendors, and information related to competitive interests. Disclosure of this information would violate FPL's contract with its vendors and/or impair FPL's efforts to enter into contracts on commercially favorable terms, and could harm the competitive business of the provider of the information. Certain information is also related to internal auditing controls or reports of internal auditors. 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. Affiant says nothing further.

Rajiv S. Kundalkar
Rajiv S. Kundalkar

SWORN TO AND SUBSCRIBED before me this 15th day of July, 2009, by Rajiv S. Kundalkar, who is personally known to me or who has produced Personally Known (type of identification) as identification and who did take an oath.

Joetha Forbes *Joetha Forbes*
Notary Public, State of Florida

My Commission Expires:

