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March 21, 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
MARCH 21 AM 11:06
COMMISSION CLERK

Re: Docket No. 20180001-EI

Dear Ms. Stauffer:

REDACTED

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Second Request for Extension Confidential Classification of Materials Provided Pursuant to Audit No. 16-020-4-2. The request includes First Revised Exhibits A, B (two copies), C and D.

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

COM _____
A-1) _____
APA 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: March 21, 2018

**FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 16-020-4-2**

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. 16-020-4-2 ("Confidential Information"). In support of this request, FPL states as follows:

1. On May 24, 2016 FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("May 24, 2016 Request"). By Order No. PSC-16-0403-CFO-EI, dated September 21, 2016 ("Order 0403"), the Commission granted FPL's May 24, 2016 Request. FPL adopts and incorporates by reference the May 24, 2016 Request and Order 0403.

2. The period of confidential treatment granted by Order 0403 will soon expire. The Confidential Information that was the subject of FPL's May 24, 2016 Request and Order 0403 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.

3. Included herewith are First Revised Exhibit A, First Revised Exhibit B, together with First Revised Exhibit C to reduce the number of pages for which confidential treatment is sought.

4. First 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 First Revised Exhibit B.

5. First 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 affiants who support the requested classification.

6. First Revised Exhibit D contains the declarations of Craig Arcari, Antonio Maceo and Gerard J. Yupp in support of this Request.

7. 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 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.

8. As described more fully in the declarations included as Exhibit D, certain documents relate to internal auditing controls and reports of internal auditors. This information is protected by Section 366.093(3)(b), Fla. Stat.

9. Additionally, certain documents contain information related to security measures, systems or procedures. This information is protected by Section 366.093(3)(c), Fla. Stat.

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

11. Last, certain information in these documents concern FPL's competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

12. 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 affidavits included herewith, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

John T. Butler
Assistant General Counsel - Regulatory
Maria J. Moncada
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Florida Power & Light Company
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Juno Beach, FL 33408
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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 First Request for Extension of Confidential Classification* has been furnished by electronic service on this 21st day of March 2018 to the following:

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Users Group**



Maria J. Mencada

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

EXHIBIT A

CONFIDENTIAL
FILED UNDER SEPARATE
COVER

EXHIBIT B

REDACTED COPIES

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 9-1

(Pages 1 through 2)

REVIEW OF INTERNAL AUDIT

Florida Power & Light
Capacity Audit
Dkt# 160001-EI, ACN 16-020-4-2
TYE 2015

CONFIDENTIAL

Title Sample

Time	Fisca Account	R Account	Regulatory Text	Account	Account Text	Source	Internal Order	Te Docur	Document	Vendor To	Customer	Amount	
1	2015007	9408175	Tax Oth Than Inc Tax-PR Tax-	8956000	Payroll Tax OH	Fukushima Recoverable O&M - EP						\$ 567.18	Overhead for Boris Bazan - Nuclear Emergency Preparedness Coord - fukushima - provided empl # Agreed salary to payroll report.
2	2015009	9408175	Tax Oth Than Inc Tax-PR Tax-	8956000	Payroll Tax OH	ST Payroll						\$ 8,476.26	Overhead for various Nuclear Access/Security Personnel - provided list with employee #'s.
3	2015001	9506075	Misc Steam Power Expenses-	5750450	OUTSIDE SERVICES: Information	NERC 1300 [REDACTED] WE						\$ 21,966.66	NERC CIP V4,V5 Upgrades - 1/15 Labor- PO# 2000135000, Agreed per hour rates to PO [REDACTED] Gate Security Officers, 1/15 PO# 2000105570 - 24 hour security since it is US Coast Guard Maritime Security Facility
4	2015001	9506075	Misc Steam Power Expenses-	5750000	OUTSIDE SERVICES: Security	MARSEC SECURITY FORC WE						\$ 2,887.43	[REDACTED] Ovation system upgrade per NERC CIP requirements PO# 2000115851, 4/18/15
5	2015002	9506075	Misc Steam Power Expenses-	5400100	MATERIALS & SUPPLIES: Gener	NERC 1300 [REDACTED] WE						\$ 4,126.04	[REDACTED] NERC CIP V4,V5 Upgrades - 3/15 Labor, PO# 200134976
6	2015003	9506075	Misc Steam Power Expenses-	5750700	OUTSIDE SERVICES: Other	[REDACTED] NERC CIP WE						\$ 11,882.73	[REDACTED] NERC CIP V4,V5 Upgrades - 3/15 - Labor and expenses
7	2015003	9506075	Misc Steam Power Expenses-	5750450	OUTSIDE SERVICES: Information	NERC 1300 [REDACTED] WE						\$ 66,086.33	[REDACTED] NERC CIP V4,V5 Upgrades - 2/15 - Labor and expenses
8	2015003	9506075	Misc Steam Power Expenses-	5750450	OUTSIDE SERVICES: Information	NERC 1300 [REDACTED] WE						\$ 50,584.03	[REDACTED] maintenance of security equipment, 5/15 - PO 2000140398
9	2015005	9506075	Misc Steam Power Expenses-	5750700	OUTSIDE SERVICES: Other	SECURITY EQUIPMENT In WE						\$ 12,887.77	[REDACTED] Walkdowns to complete BES Cyber Systems lists for NERC CIP V5
10	2015009	9506075	Misc Steam Power Expenses-	5750400	OUTSIDE SERVICES: General Bu	NERC CIP PROCESS SUPP WE						\$ 15,993.97	[REDACTED] NERC Critical Infrastructure Protection 5 - 20% FPL Ownership
11	2015011	9506075	Misc Steam Power Expenses-	5750700	OUTSIDE SERVICES: Other	[REDACTED] NERC Compliance SA						\$ 71,240.91	AVERT All Hazards Software Upgrade - Contract # - 02345915 TP for the current stand alone avert computer systems for safeguards information computer G4S security personnel, direct employees and also allocated security officers. Agreed to invoice detail. Week ending 11/22/15
12	2015012	9524220	Misc Nucl Pwr Exp-Height Se	5760200	SOFTWARE EXPENSE	Contractor and Professio XF						\$ 80,000.00	Cyber Security - comply with NRC Part 173 requirements. Agreed to invoice details
13	2015012	9524220	Misc Nucl Pwr Exp-Height Se	5750000	OUTSIDE SERVICES: Security	Regulated Security Soluti XF						\$ 166,313.48	G4S security personnel, direct employees and also allocated security officers. Agreed to invoice detail. Week ending 11/01/15
14	2015012	9524220	Misc Nucl Pwr Exp-Height Se	5751500	OUTSIDE SVCS: Contractor Mar	Part 73 Cyber Security Irr XF						\$ 7,356.01	Cyber Security Common Controls - consultant.svs 25% of invoice - NRC Part 73 compliance
15	2015011	9524220	Misc Nucl Pwr Exp-Height Se	5750000	OUTSIDE SERVICES: Security	Regulated Security Soluti XF						\$ 160,969.55	
16	2015011	9524220	Misc Nucl Pwr Exp-Height Se	5750300	OUTSIDE SERVICES: Engineering	Part 73 Cyber Security Irr XF						\$ 28,430.95	

CONFIDENTIAL

SOURCE Logbook 17, 17 follow up

2015012
c/c

10 c-171

Monthly Billing Statement

JHP
3/1/16

Title Purchased Power

A

Facility Name: BROWARD RESOURCE RECOVERY SOUTH
Region: Southeast
Billing Month: September, 2015
Number of Hours in Month: 720
Number of Peak Hours in Month: 270

- 1 Energy Received, All Hours: [REDACTED]
- 2 Energy Received, All Peak Hours: [REDACTED]
- 3 Sales (Wheeled): [REDACTED]
- 4 Net Energy Received, All Hours: [REDACTED]
- 5 Maximum Hourly Energy: [REDACTED]
- Committed Capacity: 3.500 MW ('91)
- 6 Monthly Billing Capacity Factor: [REDACTED]
- 7 Monthly Peak Capacity Factor: [REDACTED]
- 8 Annual Capacity Factor: [REDACTED]
- 9 Annual Peak Capacity Factor: [REDACTED]
- 10 Billing Capacity Factor: [REDACTED]
- 11 Unit Energy Cost: [REDACTED]

CONFIDENTIAL

Monthly Energy Payment:	(As Available)	('91)	Total
Monthly Capacity Payment:	\$63,174.96 +	\$45,415.61 =	\$108,590.57 P1
		\$105,560.00 =	\$105,560.00 P2

46-2
1



P.21

46-2
2 P4

EXHIBIT C

JUSTIFICATION TABLE

FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: FPL Capacity Audit
AUDIT CONTROL NO: 16-020-4-2
DOCKET NO: 20180001-EI
DATE: March 21, 2018

Bold denotes revision to reduce the amount of confidential classification previously requested or a new declarant

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
9-1	Review of Internal Audit	2	Y	ALL	(b)	A. Maceo
42-1 p.2	Account Explanation	1	N			
42-1/1	Transmission Revenues	1	N			
42-1/1-1	Transmission Revenues	1	N			
42-1/1-2	Invoice	1	N			
42-1/1-2/1	Invoice	2	N			
42-1/1-3	Transmission Service Sales	1	N			
42-1/1-3/1	Transmission Sales Report	4	N			
42-1/1-4	Transmission Sales	1	N			
42-1/2	Deal Form	1	N			
42-1/2-1	Entry Form	1	N			
42-1/3	Deal Form	1	N			
42-1/3-1	Entry Form	1	N			
42-1/4	Deal Form	1	N			
42-1/5	Deal Form	1	N			
42-1/6	Deal Form	1	N			
42-1/7	Rates	1	N			
42-1/8	Deal Form	1	N			
42-1/8-1	Tariff	1	N			
42-1/8-2	Tariff	1	N			
44-3	Security Costs Sample	3	Y	Pg.1, Col. A, Lns. 1-6 Col. B, Lns. 1-9	(c), (d), (e)	C. Arcari
			N	Pgs. 2 and 3		
46-2	Purchased Power	1	N			
46-2/1	Purchased Power	1	N			
46-2/1-1	Purchased Power	1	N			
46-2/2	Purchased Power	4	N	Pgs. 1-3	(d), (e)	Yupp
			Y	Pg. 4, Col. A, Lns. 1-11		
46-3	Purchased Power	1	N			
46-3/1	Calculation of Purchased Power	1	N			
46-3/2	Calculation of Purchased Power	1	N			
46-3/3	Calculation of Purchased Power	1	N			
46-4	Purchased Power	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
46-4/1	Purchased Power	1	N			
46-4/2	Calculation of Purchased Power	2	N			
46-5	Purchased Power	1	N			
46-5/1	Purchased Power	1	N			
46-5/2	Purchased Power	1	N			
46-5/2-1	Purchased Power	1	N			
46-5/2-2	Purchased Power	1	N			
46-5/3	Purchased Power Invoice	1	N			
46-6	Purchased Power	1	N			
46-6/1	Explanation	1	N			

FIRST REVISED

EXHIBIT D

DECLARATION

FIRST 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 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 written declaration.

2. I have reviewed Exhibit C and the documents that are included in Exhibit A to FPL's First Request for Confidential Classification of Information Obtained in Connection with Audit No. 16-020-4-2 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 identify FPL's security measures; contain or constitute bids or other contractual data, the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms in the future; and contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the documents contain information concerning services provided for compliance with North American Electric Reliability Corporation Critical Infrastructure Protection requirements and amounts paid to vendors for those services. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Nothing has occurred since the issuance of Order No. PSC-16-0403-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: March 9, 2018

FIRST 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 written declaration.

2. I have reviewed Exhibit C and the documents that are included in Exhibit A to FPL's First Request for Confidential Classification of Information Obtained in Connection with Audit No. 16-020-4-2 for which I am identified as the declarant. The 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 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, 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 this information.

3. Nothing has occurred since the issuance of Order No. PSC-16-0403-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.



ANTONIO MACEO

Date: _____

3/8/18

FIRST 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 written declaration.

2. I have reviewed Exhibit C and the documents that are included in Exhibit A to FPL's First Request for Confidential Classification of Information Obtained in Connection with Audit No. 16-020-4-2 for which I am identified as the declarant. The 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 contractual data such as pricing formulas and other terms, payment records, and supplier rates for capacity and energy transactions, the disclosure of which would impair the efforts of FPL to contract for capacity and energy 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 this information.

3. Nothing has occurred since the issuance of Order No. PSC-16-0403-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.



GERARD J. YUPP

Date: 3/9/18