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COMMISSION
CLERK

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October 29, 2021

Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

Re: Docket No. 20210007-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") First Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 2018-036-4-1. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the 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 is a justification table in support of FPL's Request for Confidential Classification. Exhibit D consists of the declaration in support of FPL's Request for Confidential Classification.

- COM _____
- AFD _____
- APA 1 *EXH B*
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

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

Sincerely,

David M. Lee

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

Docket No. 20210007-EI

Filed: October 29, 2021

**FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2018-036-4-1**

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 First Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 2018-036-4-1 ("Confidential Information"). In support of this request, FPL states as follows:

1. On June 20, 2018, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("June 20, 2018 Request"). By Order No. PSC-2018-0525-CFO-EI, dated November 2, 2018 ("Order 0525"), the Commission granted FPL's June 20, 2018 Request. FPL adopts and incorporates by reference the June 20, 2018 Request and Order 0525.

2. The period of confidential treatment granted by Order 0525 will soon expire. Some of the Confidential Information that was the subject of FPL's June 20, 2018 Request and Order 0525 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 with this request 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. FPL has identified in First Revised Exhibits A, B and C all of the

information in work papers that warrants continued confidential treatment. First Revised Exhibit C is a table that identifies the specific pages, lines or columns that remain confidential. FPL indicates in bold font on First Revised Exhibit C revisions made to reduce the amount of information classified as confidential. The table also references the specific statutory basis for confidentiality and the declarant who supports the requested classification.

4. The declarant supporting this request has changed. Also included as First Revised Exhibit D is the declaration of Charles R. Rote in support of this request. First Revised Exhibit C also denotes the new declarant in bold font.

5. 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.

6. As explained more fully in the declaration included as First Revised Exhibit D, certain 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.

7. Additionally, certain documents contain competitively sensitive information related to certain employees' compensation. Public disclosure of compensation information for particular positions would enable competing employers to meet or beat the compensation offered by FPL, resulting in the loss of talented employees, or conversely, the need to increase the level

of compensation already paid in order to retain these employees and attract new talent. The quality of service and the cost of service implications would be detrimental to FPL and its customers. This information is protected by Section 366.093(3)(e), Fla. Stat.

8. Nothing has changed since the Commission entered Order 0525 to render the Confidential Information identified in First Revised Exhibit C stale or public, such that continued confidential treatment would not be appropriate.

9. Pursuant to 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 included with or incorporated in this Request, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

By: 

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CERTIFICATE OF SERVICE
Docket No. 20210007-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished
by electronic service on this 29th day of October 2021 to the following:

Charles Murphy
Jacob Imig
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By: 
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Florida Bar No. 103152

[Handwritten signature]

FIRST REVISED EXHIBIT "B"

ACN 2018-036-4-1

CONFIDENTIAL

Florida Power & Light Company
Environmental Cost Recovery Clause
Test Year Ended: December 2017

Dkt. No.: 20180007-EJ; ACN No: 2018-036-4-1

Description: *Project 39 Sample*

*MG
4/3/18
AJ*

**FPSC CLAUSES AUDITS
ADEQUATE SUPPORTING DOCUMENTATION
AR #7 Project #39 Items #1**

Journal Vouchers

1. Copy of JV and supporting documentation including any worksheets.
2. Description of how items included in JV relate to clause and how they are used to support clause programs.

Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

All of the items listed below are clause related because they involve routine maintenance and outage activities in support of the Martin Solar project maintenance.

Attached are the supporting documents for the accrual.

This accrual was re-accrued thru May and paid in June, 2017 per the attached invoices.

3. If correction supply original entry and explain reason for correction.

** Audit staff reviewed the supporting
1 documentation in the amount of [REDACTED] A
and did not maintain in work papers. MA*

SOURCE



CONFIDENTIAL

Florida Power & Light Comp.
Environmental Cost Recovery Clause
Test Year Ended: December 2017
Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1
Description: *Project 39 Amole.*

*MG
4/3/18
JD*

**FPSC CLAUSES AUDITS
ADEQUATE SUPPORTING DOCUMENTATION
AR #7 Project #39 Item 2**

M&S

1. Item description and how that item relates to clause and how it supports clause programs.

The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

The pump seal listed below is clause related because it involves routine maintenance activities in support of the Martin solar facility.

- 1 Several inboard and outboard seals for the Main HTF pumps were purchased from [redacted] as non-M&S items. Seals that were not used immediately were returned to [redacted] stores and entered into our inventory giving us a credit of [redacted] *16-29*

2. Copy of M&S record.

*Did not maintain supporting documentation in workpapers.
WA*



AKG.
4/3/18
N

FPSC CLAUSES AUDITS
ADEQUATE SUPPORTING DOCUMENTATION
AR #7, Item #3

Cash Vouchers

1. Vendors invoice
2. Purchase order
3. Contract with vendor, if applicable
4. Time sheets, etc. for contract labor
5. Explain how items on invoice relate to clause i.e., how are they used to support clause activity.

CONFIDENTIAL

The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

- 1 • The invoice in question ¹⁶⁻²⁹ [redacted] is from the ^B [redacted] who was contracted to remove broken mirrors and replace them with new ones. This work is related to the clause because it involves routine maintenance activities in support of the Martin solar facility.
 - A copy of the purchase order and the invoice (with timesheets) are attached above.
6. If invoice is allocated between or among programs, indicate allocation percentage and rationale for allocation.
7. If it is advertising, provide the ads.

Did not maintain supporting documentation in work papers.
AKG.

AR # 7

Project #39

#4

McAlice, Mary

PBC

From: Moncrief, Gary
 Sent: Wednesday, March 21, 2018 11:51 AM
 To: Vantuinen, Lorie; McAlice, Mary
 Subject: RE: IMMEDIATE ACTION NEEDED - ECRC TRANSACTION AUDIT PROJECT #39

Mary, The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

- 1) The M&S items listed below are replacement mirrors for the solar field. This work is related to the clause because it involves routine maintenance activities in support of the Martin solar facility.
- 2) M&S record below...

Description:
 Dkt. No.: 20180007-El; ACN No: 2018-036-4-1
 Florida Power & Light Company
 Environmental Cost Recovery Clause
 Test Year Ended: December 2017
 Project 29 Sample

Material Document List

Material	Material Description	Plant Name	Qty	Unit	Amount	LC Order
0-772-452-000	MIRROR:400 X 1641 X 1700	0973-FPL MARTIN STOREROOM				
00	261 4919290012	14 02/01/2017	30	EA		G00000129458
00	261 4919290012	15 02/01/2017	5	EA		G00000129458
00	261 4919290012	13 02/01/2017	9	EA		G00000129458
00	261 4919290012	12 02/01/2017	30	EA		G00000129458
00	261 4919290012	17 02/01/2017	5	EA		G00000129458

CONFIDENTIAL

16-29

Gary D. Moncrief Sr.
 PGD Business Services Manager
 Martin Power Plant
 772-597-7101 (Office)
 561-307-6674 (Cell)

From: Vantuinen, Lorie
 Sent: Wednesday, March 21, 2018 9:57 AM
 To: Moncrief, Gary; Trimnal, Mary
 Cc: McAlice, Mary
 Subject: IMMEDIATE ACTION NEEDED - ECRC TRANSACTION AUDIT PROJECT #39

16-29 A.1

4/13/18
 MS
 AD

SOURCE

PBC

FPSC CLAUSES AUDITS ADEQUATE SUPPORTING DOCUMENTATION

M&S

1. Item description and how that item relates to clause and how it supports clause programs.
2. Copy of M&S record.

G00000129458	PMN SOLAR MIRROR& TUBES REPL A08	5400102	M&S-PG/NU Stores OH	[REDACTED]	02/01/2017
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A

16-29

CONFIDENTIAL

Description:

Florida, Inc. & Light Company
 Environmental Cost Recovery Clause
 Test Year Ended: December 2017
 Dkt. No.: 20180007-EE; ACN No: 2018-0364-1
 Project 39 Sample

MS
 4/3/18
 AL

16-29 A 2

*4/13/18
146*

**FPSC CLAUSES AUDITS
ADEQUATE SUPPORTING DOCUMENTATION
AR #7, Item #5**

Cash Vouchers

1. Vendors invoice
2. Purchase order
3. Contract with vendor, if applicable
4. Time sheets, etc. for contract labor
5. Explain how items on invoice relate to clause i.e., how are they used to support clause activity.

CONFIDENTIAL

The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

1.
 - The invoice in question ¹¹⁶⁻²⁹ [redacted] is from [redacted] ^B who was contracted to remove broken mirrors & tubes and replace them with new ones. This work is related to the clause because it involves routine maintenance activities in support of the Martin solar facility.
 - A copy of the purchase order and the invoice are attached above.
6. If invoice is allocated between or among programs, indicate allocation percentage and rationale for allocation.
7. If it is advertising, provide the ads.

*Did not maintain supporting documentation in work papers.
NA*



MG
4/3/18

AR#7
Project#89
Item #6

16-29.6.1

From: Vantuinen, Lorie
Sent: Monday, March 19, 2018 2:54 PM
To: Moncrief, Gary; Nieb, John
Cc: Nieb, John
Subject: AUDIT QUESTION

The [redacted] DEBIT original accrual was pulled in the audit of ECRC transactions. I have the document copy, but when I looked in March to see if it had been paid, it doesn't look like it was paid or re-accrued. Line item #11 on the journal entry.

1) We will need to know how this work supported the clause, copy of invoice if paid, etc. Same drill that Mary has been asking for the other samples. This might have been paid the following month by a different IO.

Order	CO object name	BusA	Cost El	Cost element name	Val in rep. cur.	Doc. Date	Name	Per	Year	P	Pur.	Offset
2	G00000129151		A08	5750700 Out-Serv-Othr	[redacted]	02/28/2017	2000219431 [redacted]	2	2017			Accr L
3	G00000129151		A08	Out-Serv-Othr	[redacted]	02/28/2017	2000219431 [redacted]	3	2017			Accr L
			5750	Out-Serv-Othr	0.00							
					0.00							

Florida Power & Light Company
Environmental Cost Recovery Clause
Test Year Ended: December 2017
L... No.: 20180007-EI; ACN No: 2018-036-4-1
Description: PROJECT 20

CONFIDENTIAL



ENTRICE

*NG
4/3/18
RD*

**FPSC CLAUSES AUDITS
ADEQUATE SUPPORTING DOCUMENTATION
AR #7; Project #39; Items #7, #8, & #9**

Payroll

1. Employee's job description and how that job relates to clause and how it supports clause programs.

The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred. The hours in question were in support of the Martin solar facility.

- 1 • [REDACTED]^A - These overtime hours were worked in support of the main HTF pump removal and installation. This work is related to the clause because it involves routine maintenance activities in support of the Martin solar facility.
 - 2 • Time record - See attached. Hours charged: 114 hours at hourly rate of [REDACTED]^A.
 - 3 • There was also payroll taxes related to this work [REDACTED]^A.
 - Direct charge
2. Copy of time record for selected employee for period selected, including hours charged to clause programs and pay rate.
 3. Was payroll a direct charge or a fixed allocation? If a fixed allocation, please provide the basis for the allocation.

CONFIDENTIAL

41318
MG
D

**FPSC CLAUSES AUDITS
ADEQUATE SUPPORTING DOCUMENTATION
AR #7; Project #39; Items #10 & #11**

Payroll

1. Employee's job description and how that job relates to clause and how it supports clause programs.

The Martin Solar project is approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred. The hours in question were in support of the Martin solar facility.

Item #10

- 1 • [redacted]^A - Itinerant, Maint. Tech I&C. These hours were worked in support of the main HTF pump removal and installation.
- 2 • Time record - attached above - (19 hours charged at [redacted]^A hourly rate)
- Direct charge

Item #11

- 3 • [redacted]^A - Special Itinerant, Mechanic [redacted]^B hourly rate). These hours were worked in support of the main HTF pump removal and installation.
 - Time record - See attached
 - Direct charge
2. Copy of time record for selected employee for period selected, including hours charged to clause programs and pay rate.
3. Was payroll a direct charge or a fixed allocation? If a fixed allocation, please provide the basis for the allocation.

* Audit staff reviewed timesheets.
Did not maintain in work papers MA.

CONFIDENTIAL

Description: *Project 39 same*

*MG
4/6/18
AL*

**FPSC CLAUSES AUDITS
ADEQUATE SUPPORTING DOCUMENTATION
AR #7, Project #39; Items #12 to #18**

Cash Vouchers

1. Vendors invoice
2. Purchase order
3. Contract with vendor, if applicable
4. Time sheets, etc. for contract labor
5. Explain how items on invoice relate to clause i.e., how are they used to support clause activity.

CONFIDENTIAL

The Martin Solar Project is approved by the Public Service Commission under the Environmental Cost Recovery Clause (ECRC) for cost recovery of all reasonable and prudent costs incurred. All of the charges in question are clause related because they were in support of the Martin Solar Facility. Specifically, they all supported a capital project to install an additional 40 FT of 8" piping with isolation valves at the header of each HRSG on Martin Units 8A,B,C,D for the Solar Thermal system. This project was a fleet request to enable isolation of a Solar train while keeping the HRSGs online.

- 1 Item #12: [REDACTED]^A - contracted to install two (2) 8" isolation valves and pipe modifications.
- 2 Items #13, #14, and #15: [REDACTED]^A - payroll for non-FPL Central Maintenance
- 3 Contract Coordinator [REDACTED]^A to oversee contractors working on above project.
- 4 Item #16: [REDACTED]^A - contracted to perform Non-Destructive Examination inspection services on two (2) solar isolation valves and piping modifications.
- 5 Item #17: [REDACTED]^A - contracted to provide scaffolding and insulation work for the installation of solar isolation valves and pipe modifications for the above project.

Item #18: Supv, Engineering & Capital Support - engineering overheads related to the above project.

6. If invoice is allocated between or among programs, indicate allocation percentage and rationale for allocation.
7. If it is advertising, provide the ads.

** Audit staff maintained selected workpapers. MG.*

4/29/17
R

Layout ECRC ECRC Active
Order GPMR10015630 Install (2) 8" Isolation Valve
Report currency USD US Dollar

16-29.9.1

Order	CO object name	BusA	Cost Elem.	Cost element name	Val. in rep. cur.	Document Date	Name	Partner
GPMR10015630	Instal (2) 8" Isolation Valves and	A08	5750320	Out Serv-Construct	XXXXXXXXXX	02/24/2017	MARTIN 163170 022317 02/23/17 - 02/23/17	

16-29

CONFIDENTIAL

Florida Power & Light Company
Environmental Cost Recovery Clause
Test Year Ended: December 2017
Dkt. No.: 20180007-El; ACN No: 2018-036-4-1
Description: PROJECT 3A sample



SOURCE

MS
4/16/18
R

G/L Account 5750550 OUTSIDE SERVICES: Contractor Straight Time Labor

Company Code 1500 FLORIDA POWER & LIGHT CO

Doc. no. 5402001791

Line Item 1 / Costs / 81	
1	Amount [redacted] USD
	Tax code 10-29
	Tax Jur.

Additional Account Assignments	
Cost Center	Order GPMR10015631
Sales Order 0 0	
WBS Element	Network <input type="button" value="More"/>
Quantity 1 AD	
Assignment 20170206	
2	Text [redacted] 02052017-74-NEETS00130728 <input type="button" value="Long text"/>

Florida Power & Light Company
 Environmental Cost Recovery Clause
 Test Year Ended: December 2017
 Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1
 Description: Project SA Sample

CONFIDENTIAL

#15
 a/c
 P#C
 SOURCE

10-29-9.2

MS
4/16/14

Display Document: Line Item 003

#14

16-29.9.3

Additional Data

G/L Account 5750560 OUTSIDE SERVICES: Contractor Other Labor
Company Code 1500 FLORIDA POWER & LIGHT CO

Doc. no. 5402001791

Line Item 3 / Costs / 81

1 Amount [redacted] USD
Tax code 16-29
Tax Jur.

Additional Account Assignments

Cost Center [redacted] Order GPMR10015633
Sales Order 0 0
WBS Element [redacted] Network [redacted] More
Quantity 1 AU
Assignment 20170206
2 Text [redacted] 02052017-74-NEETS00130728 Long text

Florida Power & Light Company
Environmental Cost Recovery Clause
Test Year End: December 2017
Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1
Description: Project 39 Sample

CONFIDENTIAL



SOURCE

MS
Helly

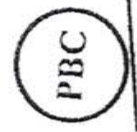
15

16-299.4

Additional Data	
G/L Account	5750570 <input type="checkbox"/> JTSIDE SERVICES: Contractor Non Labor Expenses
Company Code	1500 FLORIDA POWER & LIGHT CO
Doc. no: 5402001817	
Line Item: 1 / Costs / 81	
1 Amount	[REDACTED] USD
Tax code	10-29
Tax Jur.	
Additional Account Assignments	
Cost Center	Order: GPMR10015633
Sales Order	0 0
WBS Element	Network: <input type="button" value="More"/>
Quantity	1 AU
Assignment	20170206
2 Text	[REDACTED] 02042017-940-NEEES00033015 <input type="button" value="Long text"/>

Florida Power & Light Company
 Environmental Cost Recovery
 Test Year Ended: December 2017
 Dkt. No.: 20180007-EI; ACN No: 2018-036-4-1
 Description: **Product 39 sample**

CONFIDENTIAL



SOURCE

MS
4/10/18

Layout ECRC ECRC ☑ Active
Order GPMR10015630 Install (2) 8" Isolation Valve
Report currency USD US Dollar

110-799905

Order	CO object name	BusA	Cost Elem.	Cost element name	Val in rep. cur.	Document Date	Name
1 GPMR10015630	Instal (2) 8" Isolation Valves and	A08	5750600	Out Serv-Samp&Test		02/16/2017	02/16/17 - 02/16/17

16-29

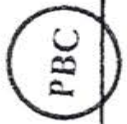
Florida Power & Light Company
Environmental Cost Recovery Clause
Test Year Ended: December 2017

Dkt. No.: 20180007-EI; ACN No.: 2018-036-4-1

Description: project 391 sample.

CONFIDENTIAL

91#



SOURCE

M9
4/16/18

Additional Data

G/L Account 5751000 JTSIDE SVCS: Building Services
Company Code 1500 FLORIDA POWER & LIGHT CO

Doc. no. 5402004765

Line Item 17 / Costs / 81

1 Amount [redacted] USD
Tax code 10-29
Tax Jur.

Additional Account Assignments

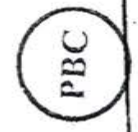
Cost Center Order GPMR10015633
Sales Order 0 0
WBS Element Network
Quantity 1 AU
Assignment 20170208
Text material, equip, lodging 01/01/17 - 01/2 Long text

#17

110-799.9.10

Florida Power & Light Company
Environmental Cost Recovery C
Test Year Ended: December 2017
Dkt No.: 20180007-El; ACN No: 2018-036-4-1
Description: Project 39 Sample

CONFIDENTIAL



SOURCE

M&S
5/16/18

Cost Element	Cost element name	Unit	Val in rep. cur.	Total quantity	PUM	O	Offsetting acct	Name of offsetting account
5400102	M&S-PG/NU Stores OH	1	[REDACTED]	21	FT	M	2305000	Inv. M & S (ECC 6)
5993000	PP-Supv Eng&Cap Sup	2	[REDACTED]			S	3332000	I/F Crg-Over 999

16-29

Florida Power & Light Company
Environmental Cost Recovery Clause
Test Year Ended: December 2017
DR. No.: 20180007-EI; ACN No: 2018-036-4-1
Description: PROCES 3A sample

CONFIDENTIAL

#18

PBC

SOURCE

11. - 29.9.7

MS
4/16/18
AD

McAlice, Mary

Subject: FW: AUDIT REQUEST - ECRC SUPPORT
Attachments: 20180319183230227.pdf

16-29 11.1

Order	CO object name	BusA	Cost El	Cost element name	Val in rep. cur.	Doc. Date	Name	Per. Year/P	Purch. Doc.	Offset. acct name	RefDocNo	Name of offsetting acc
1	G00000126626		A08	5750700 Out Serv-Othr		02/15/2017		2.2017	2000192086	GR/R Clearing	S003251095	GOODS RECEIPT/ INVC

16-29

Apply Clear

Last Refresh: 02/19/2018 14:55:18 EST Refresh Stop Transaction

View: Standard View Display Print Preview Refresh Export

Confirmation Number	Confirmation Name	Status	Specification	Reference Document	Created by	Posting Date	Created On
S202717968		790.80 1...	Posted in the Backend	Goods/Services Confirmation	9068894	12/27/2017	12/27/2017
S202717964		790.80 0...	Posted in the Backend	Confirmation of Cancellation	ASIMON 053017	12/27/2017	12/27/2017
S202475476		790.80 0...	Posted in the Backend	Goods/Services Confirmation	ASIMON 053017	05/30/2017	05/30/2017
S202432236		80.80 04...	Posted in the Backend	Goods/Services Confirmation	9064977	04/24/2017	04/24/2017
S202432234		80.00 04/21/17	Posted in the Backend	Confirmation of Cancellation	MILESTONE ASIMON	04/24/2017	04/24/2017
S202429173		80.00 04/21/17	Posted in the Backend	Goods/Services Confirmation	MILESTONE ASIMON	04/21/2017	04/21/2017
S202250211		80.80 02...	Posted in the Backend	Goods/Services Confirmation	9063990	02/15/2017	02/15/2017
S202025228		80.00 01/...	Posted in the Backend	Goods/Services Confirmation	9063594	01/25/2017	01/25/2017

CONFIDENTIAL

Details for Selected Item 1

Item Data Account Assignment

You can see who bears the costs and, if necessary, you can distribute the cost to several cost centres

Cost Distribution By Quantity Details

Number	A	Quantity	B	Account Assignment Category	Account Assignment Number	Account Assignment Description	General Ledger Account	General Ledger Description
0001				Order	G00000126624	PMIGBA,B,C,D DIGITAL CNTL SYS(DCS)UP	5750700	Out Serv-Othr
0002				Order	G00000126626	PMIN DIGITAL CNTL SYS(DCS)UPGRADE	5750700	Out Serv-Othr

Florida Power & Light Company
Annual Cost Recovery Clause
Year Ended: December 2017
Dkt. No.: 20180007-EI, ACN No.: 2018-036-4-1
Description: Project 39 sample

PBC SOURCE

Description: *Project 45 Sample*

Project #45

*MS
4/16/18
AR*

**FPSC CLAUSES AUDITS
ADEQUATE SUPPORTING DOCUMENTATION
AR #7 Items #1 & 2**

Cash Vouchers

1. Vendors invoice
2. Purchase order
3. Contract with vendor, if applicable
4. Time sheets, etc. for contract labor
5. Explain how items on invoice relate to clause i.e., how are they used to support clause activity. The Martin electrostatic precipitator (ESP) project and the Martin Solar project are both approved by the commission for cost recovery under the environmental cost recovery clause (ECRC) for all reasonable and prudent costs incurred.

The items listed below are clause related because they involve routine maintenance activities in support of the Martin ESP's.

ESP items:

- 1 • 1) [redacted] was contracted to provide and replace six ESP Ash discharge valves (3 valves on unit 1 and 3 valves on unit 2). The item in question is for the three valves on unit 1 [redacted]. The invoice attached above is for all six valves.
- 2 *11-29* 2) Overtime for the FPL contractor coordinator in support of the replacement of
- 3 the ash discharge valves [redacted].
11-30
6. If invoice is allocated between or among programs, indicate allocation percentage and rationale for allocation.
7. If it is advertising, provide the ads.

** Audit staff reviewed supporting documentation and did not maintain*

CONFIDENTIAL

*in
workpapers. MQ.*



FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: FPL, Environmental Audit
AUDIT CONTROL NO: 2018-036-4-1
DOCKET NO: 20210007-EI
DATE: October 29, 2021

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	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
16-28.1	Plant Project Samples	1	N			
16-28.2	Plant Project Samples	1	N	Col. A		
16-28.3	Plant Project Samples	1	N			
16-28.4	Plant Project Samples	1	N			
16-28.5	Plant Project Samples	1	N			
16-28.6	Plant Project Samples	1	N			
16-28.7	Plant Project Samples	1	N			
16-28.8	Plant Project Samples	1	N			
16-28.9	Plant Project Samples	1	N			
16-28.10	Plant Project Samples	1	N			
16-28.11	Plant Project Samples	1	N			
16-29.1	Plant Project Samples	1	Y	Line 1A	(d)	C. Rote
16-29.2	Plant Project Samples	1	Y	Lns. 1A and 2A	(d)	C. Rote
16-29.3	Plant Project Samples	1	Y	Line 1A, B	(d)	C. Rote
16-29.4	Plant Project Samples	1	N			
16-29.4.1	Plant Project Samples	1	Y	Col. A	(d)	C. Rote
16-29.4.2	Plant Project Samples	1	Y	Col. A	(d)	C. Rote
16-29.5	Plant Project Samples	1	Y	Line 1A, B	(d)	C. Rote
16-29.6	Plant Project Samples	1	N			
16-29.6.1	Plant Project Samples	1	Y	Lns. 1A, 2B, 2C, 3B and 3C	(d)	C. Rote
16-29.7	Plant Project Samples	1	Y	Lns. 1A, 2A and 3A	(d), (e)	C. Rote
16-29.7.1	Plant Project Samples	1	N			
16-29.8	Plant Project Samples	1	Y	Lns. 1A, 2A, 3A and 3B	(d), (e)	C. Rote
16-29.8.1	Plant Project Samples	1	N			
16-29.8.2	Plant Project Samples	1	N			
16-29.9	Plant Project Samples	1	Y	Lns. 1A, 2A, 3A, 4A and 5A	(d)	C. Rote
16-29.9.1	Plant Project Samples	1	Y	Col. A	(d)	C. Rote
16-29.9.2	Plant Project Samples	1	Y	Lns. 1A and 2A	(d)	C. Rote
16-29.9.3	Plant Project Samples	1	Y	Lns. 1A and 2A	(d)	C. Rote

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
16-29.9.4	Plant Project Samples	1	Y	Lns. 1A and 2A	(d)	C. Rote
16-29.9.5	Plant Project Samples	1	Y	Line 1A, B	(d)	C. Rote
16-29.9.6	Plant Project Samples	1	Y	Line 1A	(d)	C. Rote
16-29.9.7	Plant Project Samples	1	Y	Col. A, Lns. 1-2	(d)	C. Rote
16-29.10	Plant Project Samples	1	N			
16-29.10.1	Plant Project Samples	1	N			
16-29.11	Plant Project Samples	1	N			
16-29.11.1	Plant Project Samples	1	Y	Col. A Line 1B Cols. C-E	(d)	C. Rote
16-30.1	Plant Project Samples	1	Y	Lns. 1A, 2A and 3A	(d)	C. Rote

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

Docket No: 20210007-EI

DECLARATION OF CHARLES R. ROTE

1. My name is Charles R. Rote. I am currently employed by Florida Power & Light Company (“FPL”) as Director Business Services, Power Generation. 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 Extension of Confidential Classification of Information Obtained in Connection with Audit No. 2018-036-4-1 for which I am designated 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 projects. In addition, some documents contain competitively sensitive information related to certain employees’ compensation. Public disclosure of compensation information for particular positions would enable competing employers to meet or beat the compensation offered by FPL, resulting in the loss of talented employees, or conversely, the need to increase the level of compensation already paid in order to retain these employees and attract new talent. The quality of service and the cost of service implications would be detrimental to FPL and its customers. 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-2018-0525-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.

Charles R. Rote

Charles R. Rote

Date: 10/28/2021