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July 19, 2010

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COMMISSION
CLERK

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

Re: Docket No. 100009-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 of the workpapers being retained by Staff for its audit entitled "Review of Florida Power & Light's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects". The original includes Exhibit A through D. The seven (7) copies include Exhibits C and D only. One additional copy of Exhibit B is also included herewith.

Exhibit A consists of the confidential report, 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. When an entire document is redacted, one page indicating such is included. Exhibit C is a justification table supporting FPL's Request for Confidential Classification. Exhibit D contains copies of the affidavits of Nelda Jacques, Clyde Newson, and Maria Fogarty in support of FPL's Request for Confidential Classification. The original affidavits will be filed via a separate transmittal. Also included in this filing is a compact disc containing FPL's Request for Confidential Classification and Exhibit C only in Microsoft Word

COM format.

APA 3+CD

ECR

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

GCL

RAD

SSC

ADM

OPC

CLK Enclosures

cc: Parties of Record (w/out enc.)

Peña

Sincerely,

Jessica A. Cano

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant)
Cost Recovery Clause)

Docket No. 100009-EI
Filed: July 19, 2010

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
STAFF'S AUDIT WORKPAPERS**

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 contained within the Staff of the Florida Public Service Commission's ("Staff's") workpapers for its audit entitled "Review of Florida Power & Light's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects" (the "workpapers"). In support of its request, FPL states as follows:

1. During Staff's audit, Staff was provided with various confidential documents. By letter dated June 21, 2010, Staff indicated its intent to retain certain audit work papers. On June 23, 2010, FPL requested an audit exit conference. The exit conference was held on June 28, 2010. Pursuant to Rule 25-22.006(3)(a)2, Florida Administrative Code, FPL has 21 days from the date of the exit conference to file a formal request for confidential classification with respect to the work papers.

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

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

b. Exhibit B consists of a redacted copy of the workpapers.

c. Exhibit C is a table containing the specific line and page references to the confidential information for which confidential treatment is sought, and references to the

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FPSC-COMMISSION CLERK

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 Clyde Newson, Nelda Jacques and Maria Fogarty.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. Section 366.093(3), Florida Statutes, defines confidential information as information that is intended to be and is treated by the company as private in that the disclosure of the information would cause harm to the ratepayers or the company's business operations, and has not been disclosed publicly. 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.

4. As the affidavits included in Exhibit D indicate, the workpapers 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, to the detriment of FPL and its customers. This information is also related to competitive interests, and its disclosure would impair the competitive business of either FPL or its vendors. This information is treated by FPL as private, and its confidentiality has been maintained. Such information is protected by Sections 366.093(3)(d) and 366.093(3)(e), Florida Statutes.

5. Additionally, the workpapers contain information related to internal auditing controls and reports of internal auditors. Full and unfettered disclosure of information to the Internal Auditing Department is essential for the department to fulfill its role, and the confidential status of internal auditing findings and reports supports such disclosure. The release of information related to internal auditing and reports of internal auditors would be harmful to FPL and its customers because it may affect the effectiveness of the Internal Auditing Department itself. This information is treated by FPL as private, and its confidentiality has been maintained. Such information is protected from public disclosure pursuant to Section 366.093(3)(b), Florida Statutes.

6. The workpapers also contain documents related to certain personnel changes within the Extended Power Uprate organization. These documents reflect employee personnel information that is unrelated to compensation, duties, qualifications, or responsibilities. Public disclosure of this type information by the Company or the Commission would have an adverse impact on employee satisfaction with the Company, and could cause employees to seek employment with unregulated entities. This would result in the loss of highly skilled and trained employees, and could also hinder FPL's ability to attract new talent, all to the detriment of FPL's business operations and FPL's customers. Accordingly, this information is protected pursuant to Section 366.093(3)(f), Florida Statutes. Even if one were to take the position that the information is somehow related to employee duties or responsibilities, the information can and should be maintained as confidential pursuant to the general definition of confidential information in Section 366.093(3), Florida Statutes. *See Florida Power & Light Company, et. al, v. Florida Public Service Commission*, 31 So. 3d 860 (Fla. 1st DCA 2010) (holding that it is error to fail to consider whether information falls within the definition of proprietary confidential

business information). This information is treated by FPL as private, and its confidentiality has been maintained. It is therefore proprietary confidential business information pursuant to Section 366.093(3), Florida Statutes.

7. Further, confidential treatment of documents related to the personnel changes is necessary to protect the employees' rights to privacy. In Florida, a citizen's right to privacy is independently protected by the state constitution. *See*, Art. V, § 23, Fla. Const. Accordingly, the citizens of Florida, in amending the state constitution, explicitly recognized individual privacy interests. FPL consistently seeks to protect the privacy interests of both its employees and customers to the extent possible.

8. Finally, Staff's workpapers contain information related to an investigation commissioned by FPL to examine an employee complaint letter. This information includes specifics about the complaint, the manner in which the investigation was conducted, and the conclusions of the investigation. Disclosure of this information could have a chilling effect on the Company's willingness to conduct such investigations and share the results with Staff. Additionally, because the investigation included interviews with employees, public disclosure could have a chilling effect on employees' willingness to report concerns or otherwise fully cooperate with such investigations. Accordingly, the investigation is similar to an internal audit, and the potential harm to FPL and its customers if the information is disclosed is similar to the harm that would be caused by disclosure of internal auditing information. The Commission has recognized that this type of information should be treated as confidential, and has previously granted confidential classification to material pertaining to a company's internal investigation on the grounds that the investigation was similar to an internal audit. *See, e.g., In Re: Application for Rate Increase by City Gas Company of Florida*, Order No. PSC-97-0039-CFO-GU, Docket

No. 960502-GU (issued Jan. 9, 1997). This information is treated by FPL as private, and its confidentiality has been maintained. It is therefore proprietary confidential business information pursuant to Section 366.093(3), Florida Statutes.

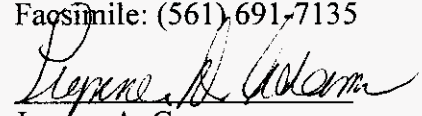
9. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information 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 supported by the exhibits and affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted

Respectfully submitted,

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By:


Jessica A. Cano
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**CERTIFICATE OF SERVICE
DOCKET NO. 100009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification (without attachments) was served by U.S. Mail this 19th day of July, 2010, to the following:

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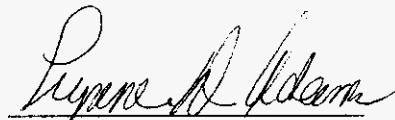
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EXHIBIT C

DOCUMENT NUMBER - DATE

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Exhibit C
Company: Florida Power and Light Company
Title: List of Confidential Workpapers for
Staff's Review of the Project Management Internal Controls
For Nuclear Power Uprate and New Nuclear Projects
Docket No. 100009-EI

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
Work Plan-EPU	Document Summary Control Log	117	Y	Pages 1, 3-9, 11-12, 14, 16, 18-19, 22, 35, 42, 63-64, 66, 69, 72, 80-81, 86, 87, 89, 91, 102-104, Sections 1-2 Pages 2, 30, 37, 47, 51, 77, 82, 84, Sections 1-4 Pages 10, 13, 15, 17, 20-21, 23, 50, 65, 67-68, 97, 100, 101, 107, 111, 114 Section 1	(d), (e)	Clyde Newson
			N	Page 24 Section 1 Lines 1-8		
			Y	Pages 25-26, 45, 54-57, 60-62, 70, 78, 92-96, 98, 105-106, 110, 116-117 Pages 27-28, 43, 49, 53, 83, 85, Sections 1-6 Pages 29, 31, 52, 73, 75, 90, 113 Sections 1-5 Pages 32-34, 36, 38-41, 48, 58, 71, 74, 76, 79, 99, 108, Sections 1-3	(d), (e)	Clyde Newson
				Page 112 Sections 1-3	(f)	

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Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				Page 115 Sections 1-3 Page 44, 109 Lines 1-7, Section 1 Page 46 Lines 1-7 Pages 59, 88 Sections 1-8	(d), (e)	
ICDR 1	List of Data Request	6	N			
ICDR 1.1-EPU	Data Request	1	N			
ICDR 1.1-EPU	Project Integration Plan	151	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU 1	PSL Bechtel Monthly Report May 2009	11	N	Pages 1-2		Clyde Newson
ICDR 1.1-EPU	Bechtel May 2009 Completed Action	1	N	Pages 3-11 ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	Bechtel May 2009 Outstanding Action Report	4	N			
ICDR 1.1-EPU	PSL Bechtel Monthly Project Status Report May 2009	19	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	Bechtel Procurement Long Lead Report	2	N			
ICDR 1.1-EPU	PSL Bechtel Monthly Report June 2009	43	N	Pages 1-2		Clyde Newson
ICDR 1.1-EPU	PSL Bechtel Monthly Report July 2009	56	Y	Pages 3-43 ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	PSL Bechtel Monthly Report August 2009	68	N	Pages 1-2		Clyde Newson
ICDR 1.1-EPU	PSL Bechtel Monthly Report September 2009	70	Y	Pages 3-68 ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	PSL Bechtel Monthly Report October 2009	72	N	Pages 1-2		Clyde Newson
ICDR 1.1-EPU	PSL Bechtel Monthly Report October 2009	72	Y	Pages 3-72 ALL	(d), (e)	Clyde Newson

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
ICDR 1.1-EPU 1	PSL Bechtel Monthly Report November 2009	72	N Y	Pages 1-2 Pages 3-72 ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	Bechtel Monthly Project Status Report December 2009	71	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	PSL Bechtel Project Integration Plan	97	N Y	Pages 1-2 Pages 3-97 ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	PTN Bechtel Monthly Report May 2009	33	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	PTN Bechtel Monthly Report June 2009	17	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	PTN Bechtel Monthly Report July 2009	55	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	Bechtel PTN Bechtel Monthly Report August 2009	69	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	PTN Bechtel Monthly Report September 2009	80	N Y	Pages 1-2 Pages 3-80 ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	PTN Bechtel Monthly Report October 2009	74	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	PTN Bechtel Monthly Report November 2009	72	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.1-EPU	PTN Bechtel Monthly Report December 2009	66	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.2a-EPU	Data Request	1	N			
ICDR 1.2b-EPU	Data Request	1	N			
ICDR 1.2c-EPU	Data Request	1	N			
ICDR 1.2d-EPU	Data Request	1	N			
ICDR 1.2e-EPU	Data Request	1	N			
ICDR 1.2f-EPU	Data Request	1	N			
ICDR 1.2g-	Data Request	1	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
EPU						
ICDR 1.2h-EPU	Data Request	7	N Y N	Page 1 Pages 2-6 Cols 1, 7 Page 7	(e)	Clyde Newson
ICDR 1.2i-EPU	Data Request	1	N			
ICDR 1.2j-EPU	Data Request	1	N			
ICDR 1.2j-EPU	EPPI-340	35	N			
ICDR 1.2k-EPU	Data Request/Gantry Cranes Upgrades	4	N			
ICDR 1.3	Data Request	1	N			
ICDR 1.4a-EPU	EPU Organizational Chart	3	N			
ICDR 1.4c-EPU	EPU Staffing Plans	5	N			
ICDR 1.5a-EPU	PSL Bechtel Procedures	4	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.5a-EPU	PTN Bechtel Procedures	4	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.5a-EPU	EPPI Cancellations	9	N			
ICDR 1.5a-EPU	EPU Governance and Oversight Protocol	16	N			
ICDR 1.5a-EPU	Data Request	2	N			
ICDR 1.5a-EPU	NP-400 Fitness For Duty	10	N			
ICDR 1.5a-EPU	NP-808 Safety Hazard	4	N			
ICDR 1.5a-EPU	NP-910 Plant Readiness	3	N			
ICDR 1.5a-EPU	NAP 401 Nuclear Guideline	63	N			
ICDR 1.5a-EPU	OM-AA-101-1006 Outage Review Board	9	N			
ICDR 1.5a-EPU	PI-AA-102-1000 Nuclear Guideline Soer	24	N			
ICDR 1.5a-EPU	PI-AA-102-1001 Nuclear Guideline	15	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
	OE Program to Industry					
ICDR 1.5a-EPU	PI-AA-102-1002 Nuclear Guideline Internal OE	12	N			
ICDR 1.5a-EPU	PI-AA-102-1003 Nuclear Guideline Sharing OE	19	N			
ICDR 1.5a-EPU	PI-AA-102-1005 Nuclear Guideline OE Plant Information Center Data	6	N			
ICDR 1.5a-EPU	PI-AA-102 Nuclear Guideline	19	N			
ICDR 1.5a-EPU	PR-AA-1000 Nuclear Guideline	75	N			
ICDR 1.5a-EPU	WM-AA-1000 Nuclear Guideline	63	N			
ICDR 1.5a-EPU	WM-AA-1001 Nuclear Guideline	17	N			
ICDR 1.5b-EPU	EPPI-100 R3 Project Instructions	11	N			
ICDR 1.5b-EPU	EPPI-110 R15	31	N			
ICDR 1.5b-EPU	EPPI-130 R3 Contractor Staffing	10	N			
ICDR 1.5b-EPU	EPPI-140 R9	12	N			
ICDR 1.5b-EPU	EPPI-160 R2	17	N			
ICDR 1.5b-EPU	EPPI-300 R3 Project Change Control	17	N			
ICDR 1.5b-EPU	EPPI-320 R1 Cost Estimate	8	N Y N	Pages 1-2 Pages 3-6 ALL Pages 7-8	(d), (e)	Clyde Newson
ICDR 1.5b-EPU	EPPI-340 R3 Risk Management Program	13	N			
ICDR 1.5b-EPU	EPPI-380 R3 Self Assessment	8	N			
ICDR 1.5b-EPU	EPPI-610 R2 Project Instructions License Amendment Writers Guide	32	N			
ICDR 1.5b-EPU	EPPI-810 R1 Lucie EPU Severe Weather Preps.	11	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
ICDR 1.5b-EPU	EPPI Index	1	N			
ICDR 1.5b-EPU	Data Request	1	N			
ICDR1.6a-EPU-EPU	Data Request	1	N			
ICDR1.6a-EPU-EPU	NRC Sr. Mgmt Briefing July 17 2009	25	N			
ICDR1.6a-EPU	Nuclear Board Meeting Minutes 7-17-09	2	Y	ALL	(e)	Clyde Newson
ICDR1.6a-EPU	Nuclear Board Meeting Minutes 10-9-09	2	Y	ALL	(e)	Clyde Newson
ICDR1.6a-EPU	Rev 2 EPU-Nuclear Board PFL 7-17-09	16	N Y	Pages 1-8 Pages 9-10 Line 1; Pages 11-12 Lines 2-5; Pages 13-16 ALL	(d), (e)	Clyde Newson
ICDR1.6a-EPU	VP Call 4-20-09	2	N			
ICDR1.6a-EPU	VP Call 5-26-09	2	N			
ICDR1.6a-EPU	VP Call 6-15	5	N			
ICDR1.6a-EPU	VP Call 7-20-09	5	N			
ICDR1.6a-EPU	VP Call 8-17-09	4	N			
ICDR1.6a-EPU	VP Call 9-21-09	4	N			
ICDR1.6a-EPU	VP Call 10-19-09	4	N			
ICDR1.6a-EPU	VP Call 11-9-09	4	N			
ICDR1.6a-EPU	Daily Reports	158	N			
ICDR 1.6b-1-EPU	EPU MOPR 05-09	2	N			
ICDR 1.6b-1-EPU	EPU MOPR 06-09	3	N			
ICDR 1.6b-1-EPU	EPU MOPR 07-09	3	N			
ICDR 1.6b-1-EPU	EPU MOPR 08-09	3	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
EPU						
ICDR 1.6b-1-EPU	EPU MOPR 09-09	3	N			
ICDR 1.6b-1-EPU	EPU MOPR 10-09	3	N			
ICDR 1.6b-1-EPU	EPU MOPR 11-09	3	N			
ICDR 1.6b-1-EPU	EPU MOPR 12-09	3	N			
ICDR 1.6b-1-EPU	Data Request	1	N			
ICDR 1.6b2	Data Request	1	N			
ICDR 1.6b-3-EPU	9-9 Current Project Overview final	5	N			
ICDR 1.6b-3-EPU	FPL EPU Executive Steering Committee 05-01-09	30	N Y	Pages 1-4, 6, 8-9, 12-18, 20-22, 27-30 Page 5 Col 2-3; Page 7 Col 2-3; Page 10 Lines 5-6, 8-9; Page 11 Lines 5-6, 8; Page 19 Lines 6-12, Col 3; Page 23-26 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-3-EPU	FPL EPU Executive Steering Committee 06-23-09	29	N Y	1-3, 8-9, 12-16, 18-21, 26-30; Page 4 Col 2-4, Lines 12-16; Page 5 Col 2-3; Page 6 Col 2-4, Lines 11-18; Page 7 Col 2-3; Page 10 Lines 5-6, 8-9; Page 11 Lines 5-6, 8; Page 17 Lines 6-8, 10-12; Pages 22-25 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-3-EPU	FPL EPU Executive Steering Committee 07-25-09. PSL.	52	N Y	Pages 1-5, 10, 18, 22-23, 37-38, 40-41, 44-47, 51-52 Page 6, Lines 3-4,	(d), (e)	Clyde

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				6-7; Page 7, Line 1; Page 8 Col 3-6; Page 9 Col 1, 3-10; Page 11 Lines 1-2; Page 12, Line 1; Page 13 Col 3-4; Page 14 Lines 4-10, 12-13, 15; Page 15 Line 1; Pages 16-17 Col 3-4; Page 19 Col 5; Page 20 Line 1; Page 21 Line 1, Col 3-4; Page 24 Col 3-5; Page 25 Line 1; Pages 26-27 Col 3-4; Page 28 Lines 1-9, Col 1-9; Page 29, Lines 1-4 Col 4, Lines 2-5 Col 5; Pages 30-31, Col 3-4; Pages 32-34 ALL; Page 35 Col 6-9;		Newson

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				Page 36 Lines 1-3; Page 39 Line 1; Page 42 Lines 1-4; Page 43 Lines 1-2, 4-5; Page 48 Lines 3-4, 6-7 Page 49 Lines 3-4, 6; Page 50 Col 5-6, Line 10		
ICDR 1.6b-3-EPU	FPL EPU Executive Steering Committee 07-25-09 PTN	40	N Y	Pages 1-2, 7, 19-20, 35-36, 38-40 Page 3 Lines 3-4, 6; Page 4 Line 1; Page 5 Col 2-5; Page 6 Col 1, 3-9; Pages 8-9 Line 2; Page 10-11 Col 3-4; Page 12 Line 1; Pages 13-14 Col 3-4; Page 15 Col 2; Page 16 Col 4; Page 17 Line 1; Page 18 Col 3-4;	(d), (e)	Clyde Newson

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
				Pages 42-43 Col 2; Page 44 Line 1-2; Page 45 Line 1-6; Page 48 Col 2-3; Page 49 Col 3; Page 51 Line 1-3; Pages 57-59 Line 1		
ICDR 1.6b-3-EPU	FPL EPU Executive Steering Committee 10-23-09	39	N Y	Pages 1-7, 9, 11-16, 30-31, 36-39; Page 8 Lines 1-2; Page 10 Lines 1-2; Page 17 ALL; Page 18 Lines 1-4 Pages 19-22 Line 1; Pages 23-29 ALL; Pages 32-33 Col 1-2 Section 1; Page 34-35 Col 1	(d), (e)	Clyde Newson
ICDR 1.6b-3-EPU	FPL EPU Executive Steering Committee 11-13-09	45	N Y	Pages 1-17, 35-41 Page 18 ALL; Page 19 Col 1, Lines 1 & 4; Col 2; Col 3, Lines 5-22 Page 20 Col 1-3; Page 21 Lines 1-4	(d), (e)	Clyde Newson

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				Col 1 Pages 22-25 Line 1 Pages 26-34 ALL; Page 42-43 Col 1-2, Section 1; Page 44 Col 1 Page 45 Col 1-2		
ICDR 1.6b-3-EPU	FPL EPU Executive Steering Committee 12-28-09	36	N Y	Pages 1-9, 11-19, 27-32 Page 10 Line 1; Page 20 ALL; Page 21 Col 1; Col 2-3, Lines 5-22 Page 22 Col 1, Lines 6-20 Col 2-3; Pages 23-26 Line 1; Page 33-34 Col 1-2, Section 1 Page 35-36 Col 1	(d), (e)	Clyde Newson
ICDR 1.6b-3-EPU	Data Request	1	N			
ICDR 1.6b-4-EPU	Data Request	1	N			
ICDR 1.6b-4-EPU	Risk Register	278	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.6b-5-EPU	Data Request	1	N			
ICDR 1.6b-6-EPU	Data Request	1	N			
ICDR 1.6b-7-EPU	Data Request	1	N			
ICDR 1.6b-8-EPU	Data Request	1	N			
ICDR 1.6b-8-EPU	Vendor Integration Meeting redacted (04-27-09)	64	N Y	Pages 1-7, 10-64 Pages 8-9 Line 1	(d), (e)	Clyde

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
						Newson
ICDR 1.6b-8-EPU	Vendor Integration Meeting redacted (07-13-09)	57	N Y	Pages 1-5, 8, 11-57 Page 6-7 Line 1; Pages 9-10 Line 1;	(d), (e)	Clyde Newson
ICDR 1.6b-8-EPU	Vendor Integration Meeting redacted (10-12-09)	82	N Y	Pages 1-10, 14-22, 25-27, 30-82 Pages 11-12 Line 1; Page 13 Line 1-2; Pages 23-24 Col 1; Pages 28-29 Line 1, Col 1-2, Section 1;	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	EPU Biweekly Update 05-13-09	17	N Y	Pages 1-2, 5-11, 16-17 Pages 3-4, Line 1; Pages 12-15 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	EPU Biweekly Update 06-10-09	20	N Y	Pages 1-2, 5-8, 10-14, 19-20 Pages 3-4 Line 1; Page 9 Col 1, Line 1-2; Pages 15-18 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	EPU Biweekly Update 07-10-09	22	N Y	Pages 1-2, 8, 10-16, 21-22 Pages 3-6 Line 1; Page 7 Col 1, Line 1-2, 4-5 Page 9 Col 1, Line 1-2, 4-6 Pages 17-20 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	EPU CNO Update 10-14-09	40	N	Pages 1-6, 11-16, 18, 20-21, 33-34, 37-40		

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			Y	Pages 7-8 Line 1, Col 1-2, Section 1; Pages 9-10 Col 1; Page 17 Lines 1-2; Page 19 Lines 1-2; Pages 22-25 Line 1; Pages 26-32 ALL Page 35-36 Line 1	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	EPU CNO Update 10-27-09	20	N Y	Pages 1-3, 17-20 Pages 4-5 Line 1, Col 1-2, Section 1; Pages 6-7 Col 1; Pages 8-9 Line 1; Pages 10-16 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	EPU CNO Update 11-02-09	23	N Y	Pages 1-3, 20-23 Pages 4-5 Line 1, Col 1-2, Section 1; Pages 6-7 Col 1; Pages 8-9 Line 1; Pages 10-19 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	EPU CNO Update 11-19-09	25	N Y	Pages 1-3, 20-25 Pages 4-5 Line 1, Col 1-2, Section 1; Pages 6-7 Col 1; Pages 8-9 Line 1; Pages 10-19 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	EPU CNO Update 12-07-09	29	N Y	Pages 1-3, 20-26 Pages 4-5 Line 1, Col 1-2, Section 1; Pages 6-7 Col 1; Pages 8-9 Line 1;	(d), (e)	Clyde Newson

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				Pages 10-19 ALL Page 27-29 Col 1		
ICDR 1.6b-9-EPU	FPL EPU Risk Management 8-13-09	17	N Y	Pages 1-4, 7-8, 16-17 Pages 5-6 Line 1; Pages 9-15 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	FPL EPU Risk Management 8-27-09	16	N Y	Pages 1-2, 7-8, 15-16 Pages 3-6 Line 1; Pages 9-14 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	FPL EPU Risk Management 9-16-09	20	N Y	Pages 1-2, 7-11, 19-20 Pages 3-6 Line 1; Pages 12-18 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	FPL EPU Risk Management 9-23-09	19	N Y	Pages 1-2, 7-11, 18-19 Pages 3-6 Line 1; Pages 12-17 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	FPL EPU Risk Management 9-30-09	19	N Y	Pages 1-2, 7-11, 18-19 Pages 3-6 Line 1; Pages 12-17 ALL	(d), (e)	Clyde Newson
ICDR 1.6b-9-EPU	Data Request	1	N			
ICDR 1.6b-10-EPU	Data Request	1	N			
ICDR 1.6b-10-EPU	PSL Monthly Cash Flow Charts May to Dec 2009	10	N			
ICDR 1.6b-10-EPU	PSL Summary Cashflow EPU Total 091224	10	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.6b-10-EPU	PTN Monthly Cash Flow Charts May to Dec 2009	9	N			
ICDR 1.6b-10-EPU	Turkey Point Actual Cost 12 Dec 09	14	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.6b-	Data Request	1	Y	Page 1 Section 1	(e)	Clyde

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11-EPU						Newson
ICDR 1.6b-12-EPU	Data Request	1	N			
ICDR 1.6b-12-EPU	PSL Contract Compliance Status Log 12-22-09	1	N			
ICDR 1.6b-12-EPU	PTN Contract Compliance Status Log 12-31-09	2	N			
ICDR 1.7	Data Request	2	N			
ICDR 1.7b-EPU	EPU Level 1 Schedule	11	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.7b-EPU	2009 EPU Cost Variance Report	4	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.7d-EPU	FPL Investment Recovery Process	3	N			
ICDR 1.7d-EPU	PSL List of Disposable Equipment	2	N			
ICDR 1.7d-EPU	PTN List of Disposable Equipment	1	N			
ICDR 1.8a-EPU	Data Request	1	N			
ICDR 1.8b-EPU	Long Lead Equipment to be Purchased	1	Y	Page 1 Col 1	(d), (e)	Clyde Newson
ICDR 1.8c-EPU	Contracts and Revisions since April 2009	11	N			
ICDR 1.8c-EPU	Contracts Planned for 2010	4	N			
ICDR 1.9-EPU	Data Request	1	N			
ICDR 1.12-EPU	Data Request	1	N			
ICDR 1.12-EPU	Listing of EPC Contract Modifications	1	N			
ICDR 1.12-EPU	Listing of EPU EPC Change Orders	2	N Y	Page 1 Page 2 Col 1	(d), (e)	Clyde Newson
ICDR 1.16a-EPU	Data Request	1	N			
ICDR 1.16b-EPU	Bechtel Surveillance	12	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
	25489-000-GQS-GAQ-00002-10					
ICDR 1.16b-EPU	Bechtel Surveillance Feedwater Heater Surveillance	9	N			
ICDR 1.16b-EPU	Bechtel Surveillance feedwater heater	5	N			
ICDR 1.16b-EPU	Bechtel Surveillance QAQC_121708165 8_001	1	N			
ICDR 1.16b-EPU	2.1 EDP Comment Form - Engineering Packages	1	N			
ICDR 1.16b-EPU	2.2 EDP Comment Form – Field Change Document.	2	N			
ICDR 1.16b-EPU	2.3 EDP Comment Form – Computer Program Errors	1	N			
ICDR 1.16b-EPU	2.4 EDP Comment Form –Design Criteria	1	N			
ICDR 1.16b-EPU	2.5 EDP Comment Form – Design Verification	1	N			
ICDR 1.16b-EPU	2.6 EDP Comment Form – Engineering EDDP Systems	1	N			
ICDR 1.16b-EPU	2.7 EDP Comment Form – Engineering Drawings	1	N			
ICDR 1.16b-EPU	2.8 EDP Comment Form – Engineering Specifications	1	N			
ICDR 1.16b-EPU	2.9 EDP Comment Form – NCR/ DR Independent Verification Reports	1	N			
ICDR 1.16b-EPU	2.10 EDP Comment Form –	1	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
	SDDR					
ICDR 1.16b-EPU	2.11 EDP Comment Form – EDDP system EPDI	1	N			
ICDR 1.16b-EPU	3.1 NWWP Comments – Above Ground Piping	1	N			
ICDR 1.16b-EPU	3.2 NWWP Comments – Cable Install	1	N			
ICDR 1.16b-EPU	3.3 NWWP Comments – Cable Terminations	1	N			
ICDR 1.16b-EPU	3.4 NWWP Comments – Concrete	1	N			
ICDR 1.16b-EPU	3.5 NWWP Comments – Construction Electrical Testing	1	N			
ICDR 1.16b-EPU	3.6 NWWP Comments – Crane Use and Operation	2	N			
ICDR 1.16b-EPU	3.7 NWWP Comments – Electrical Equip install	1	N			
ICDR 1.16b-EPU	3.8 NWWP Comments – Excavation and Fill	1	N			
ICDR 1.16b-EPU	3.9 NWWP Comments – Field Material Req 4MP-T81-N6102	1	N			
ICDR 1.16b-EPU	3.10 NWWP Comments – Field Weld 3710	1	N			
ICDR 1.16b-EPU	3.11 NWWP Comments – HVAC	1	N			
ICDR 1.16b-EPU	3.12 NWWP Comments – Installation of Rotating Equipment	1	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
ICDR 1.16b-EPU	3.13 NWWP Comments – Installation Tank Vessels	1	N			
ICDR 1.16b-EPU	3.14 NWWP Comments – Instrumentation Installation	1	N			
ICDR 1.16b-EPU	3.15 NWWP Comments – Instrumentation Testing	1	N			
ICDR 1.16b-EPU	3.16 NWWP Comments – Insulation	1	N			
ICDR 1.16b-EPU	3.17 NWWP Comments – M&TE	1	N			
ICDR 1.16b-EPU	3.18 NWWP Comments – Materials Receiving 4MP-T81-N6104	1	N			
ICDR 1.16b-EPU	3.19 NWWP Comments –Pipe Supports	1	N			
ICDR 1.16b-EPU	3.20 NWWP Comments –Piping Cleanliness	1	N			
ICDR 1.16b-EPU	3.21 NWWP Comments –Pre-post weld	1	N			
ICDR 1.16b-EPU	3.22 NWWP Comments – Pressure test	1	N			
ICDR 1.16b-EPU	3.23 NWWP Comments –QCI Cable Installation	1	N			
ICDR 1.16b-EPU	3.24 NWWP Comments –QCI Cable Terminations	1	N			
ICDR 1.16b-EPU	3.25 NWWP Comments – QCI Concrete	1	N			
ICDR 1.16b-EPU	3.26 NWWP Comments –QCI Construc Elect testing	1	N			
ICDR 1.16b-	3.27 NWWP	1	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
EPU	Comments –QCI Control of M&TE.					
ICDR 1.16b-EPU	3.28 NWWP Comments –QCI Electrical Equipment	1	N			
ICDR 1.16b-EPU	3.29 NWWP Comments –QCI Excavation and Fill	1	N			
ICDR 1.16b-EPU	3.30 NWWP Comments –QCI Fabricate Install Piping	1	N			
ICDR 1.16b-EPU	3.31 NWWP Comments –QCI Field Material Storag3	1	N			
ICDR 1.16b-EPU	3.32 NWWP Comments –QCI Install Vessel, Tank, Equip	1	N			
ICDR 1.16b-EPU	3.33 NWWP Comments –QCI Instrumentation Install	1	N			
ICDR 1.16b-EPU	3.34 NWWP Comments –QCI Instrumentation Testing	1	N			
ICDR 1.16b-EPU	3.35 NWWP Comments –QCI Insulation	1	N			
ICDR 1.16b-EPU	3.36 NWWP Comments –QCI Pipe Supports	1	N			
ICDR 1.16b-EPU	3.37 NWWP Comments –QCI Piping System Cleanliness	1	N			
ICDR 1.16b-EPU	3.38 NWWP Comments –QCI Pressure Testing	1	N			
ICDR 1.16b-EPU	3.39 NWWP Comments –QCI Raceway and Assess	1	N			
ICDR 1.16b-EPU	3.40 NWWP Comments –QI Welding	1	N			

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ICDR 1.16b-EPU	3.41 NWWP Comments –Quality Procedure	1	N			
ICDR 1.16b-EPU	3.42 NWWP Comments – Quantity Reporting	1	N			
ICDR 1.16b-EPU	3.43 NWWP Comments – Raceway	1	N			
ICDR 1.16b-EPU	3.44 NWWP Comments –Rigger Qual	1	N			
ICDR 1.16b-EPU	3.45 NWWP Comments – Special Equip Installation	1	N			
ICDR 1.16b-EPU	3.46 NWWP Comments –Weld Doc and Records	1	N			
ICDR 1.16b-EPU	3.47 NWWP Comments – Welder Qual	1	N			
ICDR 1.16b-EPU	3.48 NWWP Comments – Welding Filler Material	1	N			
ICDR 1.16b-EPU	3.49 NWWP Comments – Welding Program	1	N			
ICDR 1.16b-EPU	3.50 NWWP Comments –Work Planning-Packaging	1	N			
ICDR 1.17a-b-EPU	Data Request	1	N			
ICDR 1.17a-b-EPU	PSL Shaw Scorecard (9-3-09)	1	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.17a-b-EPU	PTN Bechtel Performance Evaluation	4	Y	ALL	(d), (e)	Clyde Newson
ICDR 1.18-EPU	Data Request	1	N			
ICDR 1.19-EPU	Data Request	1	N			
ICDR 2	Data Request	1	N			

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ICDR 2.1	ECP Program	2	N			
ICDR 2.2	ECP Process	1	N			
ICDR 2.3	All Concerns	1	N			
ICDR 2.4	ECP Procedures	1	N			
ICDR 2.5	ECP Meetings	1	N			
ICDR 3	List of Data Request	2	N			
ICDR 3.1-EPU	Data Request	1	N			
ICDR 3.1-EPU	PSL EPU Modification Scope Review June 2009	26	N			
ICDR 3.1-EPU	PTN EPU Scope Review June 2009	32	N			
ICDR 3.2-EPU	Data Request	1	N			
ICDR 3.3-EPU	Data Request	1	N			
ICDR 3.4-EPU	Data Request	1	N			
ICDR 3.4-EPU	PTN Condenser White Paper 10/6/09	3	N Y	Pages 1, 3 Page 2 Col 1-5	(d), (e)	Clyde Newson
ICDR 3.5-EPU	Data Request	1	Y	Page 1 Line 21	(d), (e)	Clyde Newson
ICDR 3.6-EPU	Data Request	2	N			
ICDR 3.7-EPU	Data Request	2	N			
ICDR 3.8-EPU	Data Request	1	N			
ICDR 3.9-EPU	Data Request	1	N			
ICDR 3.9-EPU	PSL Risk Mitigation Plan 1-7-10	5	N			
ICDR 3.9-EPU	PSL Risk Register 1-7-10	5	Y	Page 1 Col 7-12, Col 15 Line 10; Pages 2-5 Col 7-12	(d), (e)	Clyde Newson
ICDR 3.10-EPU	Data Request	1	N			
ICDR 3.10-EPU	1a. ICDR 3.10 EPU.pdf (1 pg.) (Revised response disk 13)	1	N			

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ICDR 3.10-EPU	1b. ICDR 3.10 SUPP EPU.pdf (1 pg.) (Supplemental response disk 13)	1	N			
ICDR 3.10-EPU	2. DR 3.10 Response Sample Draft 100304.pdf (5 pgs.)	5	Y	Page 1 Lines 1,3 Col 8, Lines 1-4 Col 11 Page 2 Lines 1-6 Col 11 Page 3 Lines 1, 3, 7, Col 8; Lines 1- 3, 7 Col 11 Page 4 Lines 1-4, Col 8; Lines 1-5, Col 11 Page 5 Lines 1-2, Cols 8, 11	(d), (e)	Clyde Newson
ICDR 3.10-EPU	2a. DR 3.10 a through g Greater than \$1MN Revision 3-26-10 Rev 1 (17 pgs.)	17	Y	Page 1 Lines 1, 3, Col 8; Lines 1-4 Col 11 Page 2 Lines 1-6 Col 11 Page 3 Lines 1-5 Cols 8&11 Page 4 Lines 2-5 Col 8; Lines 1-5 Col 11 Page 5 Lines 1-2, 5 Col 8; Lines 1-5 Col 11 Page 6 Lines 1-3, 7 Col 11 Page 7 Lines 4, 6 Col 8; Lines 2-4, 6 Col 11 Page 8 Lines 1, 3, Col 8; Lines 1, 3-4 Col 11 Page 9-10 Lines	(d), (e)	Clyde Newson

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				1-4 Col 11 Page 11 Lines 2-4 Col 11 Page 12-13 Lines 1-5 Col 11 Page 14 Lines 1, 6 Col; 8 Lines 1-2, 4-6 Col 11 Page 15 Line 4 Col 8; Lines 1-5 Col 11 Page 16 Line 2 Col 8; Lines 1-6 Col 11 Page 17 Lines 1-3 Col 11		
ICDR 3.10-EPU	2b. DR 3.10 FPSC Additional Information 3-26-10.pdf (15 pgs.)	15	Y N	Pages 1-14 Cols 1-3 Page 15	(d), (e)	Clyde Newson
ICDR 3.10-EPU	3. EPU POs Revised April-09 thru Feb-2010 100305	22	Y N	Pages 1-21 Col 1 Page 22	(d), (e)	Clyde Newson
ICDR 3.11-EPU	Data Request	1	N			
ICDR 3.12-EPU	Data Request	1	N			
ICDR 3.12-EPU	EPU-PTN MCO Mtg Minutes (1-29-10)	5	N			
ICDR 3.13-EPU	Data Request	1	N			
ICDR 3.14	Data Request	1	N			
ICDR 3.14-EPU	Bechtel to PSL 25486-000-TCM-GAM-00166	2	N			
ICDR 3.14-EPU	Bechtel to PTN 25489-000-TCM-GAM-00156 (2)	2	N			
ICDR 3.14-EPU	EPU PSL to Bechtel NP-EPU-	14	N			

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	09-1922					
ICDR 3.14-EPU	Data Request	1	N			
ICDR 3.14-EPU	LAR Recovery plans	2	N			
ICDR 3.14-EPU	PSL CR 2009-25283 EPU Bechtel	136	N			
ICDR 3.14-EPU	PTN Action Reports	2	N			
ICDR 3.14-EPU	PTN Base Line schedule meeting	4	N Y	Pages 1-3 Page 4 Lines 2-3	(e)	Clyde Newson
ICDR 3.14-EPU	PTN Recovery Plan Development Scheme Meeting Minutes 110409	6	N			
ICDR 3.14-EPU	U3R25 Outage Engineering Procurement Schedule	21	N			
ICDR 4	List of Data Request	2	N			
ICDR 4.2-EPU	Data Request	1	Y	Page 1 Line 13	(d), (e)	Clyde Newson
ICDR 4.2-EPU	Jefferson Wells PO 4500551081 EPU	7	Y	ALL	(d), (e)	Clyde Newson
ICDR 4.2-EPU	Jefferson Wells SSJ 4500551081	4	N Y	Pages 1,4 Pages 2 Line 1-2; Page 3 Line 1	(d), (e)	Clyde Newson
ICDR 4.3-EPU	Data Request	1	N			
CDR 4.3-EPU	PSL Staffing Plan 4-3-10	5	N			
ICDR 4.3-EPU	PTN Staffing Plan 4-5-10	3	N			
ICDR 4.6-EPU	EPU-PTN-10-0094 Moisture Carryover white paper (Jan. 2010).pdf (12 pgs.)	12	N Y	Pages 1,3,4,6-11 Pages 2, 5, 12 Line 1;	(d), (e)	Clyde Newson
ICDR 4.6-EPU	EPU-PTN-10-0359 Steam Pressure white paper (Mar. 2010)	30	N Y	Pages 1-2,4-10,12,15-26,30 Pages 3, 11, 27 Line 1; Pages 13-14, 28-	(d), (e)	Clyde Newson

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				29 Col 1;		
ICDR 4.6-EPU	Exciter white paper (Aug 2009)	29	N			
ICDR 4.6-EPU	Data Request	1	N			
ICDR 4.6-EPU	PTN Spent Fuel Pool Cooling Options Analysis (Sept 2009)	7	N Y	Pages 1-2,6 Pages 3-4 Col 1; Page 5 Lines 1-2; Page 7 Lines 1-4	(d), (e)	Clyde Newson
ICDR 4.7-EPU	Data Request	1	Y	Page 1 Lines 1, 3, 9, 12, 15	(d), (e)	Clyde Newson
ICDR 4.7-EPU	Holtec PO 00118563 Rev 0 incl attachments	93	Y	ALL	(d), (e)	Clyde Newson
ICDR 4.7-EPU	Holtec PO 00118563 Rev 1	5	Y	ALL	(d), (e)	Clyde Newson
ICDR 4.7-EPU	Holtec PO 00118563 Rev 2.pdf	48	Y	ALL	(d), (e)	Clyde Newson
ICDR 4.7-EPU	Holtec PO 00118988 Rev 0 incl attachments	98	Y	ALL	(d), (e)	Clyde Newson
ICDR 4.7-EPU	Holtec PO 00118988 Rev 1	6	Y	ALL	(d), (e)	Clyde Newson
ICDR 4.7-EPU	Holtec PO 00118988 Rev 2	5	Y	ALL	(d), (e)	Clyde Newson
ICDR 4.8-EPU	Data Request	2	Y	Page 1 Lines 1-3, 6; Page 2 Lines 1, 3, 7, 8	(d), (e)	Clyde Newson
ICDR 4.8-EPU	Attachment 1 (1 of 3)	1	Y	Page 1 Lines 9-20	(d), (e)	Clyde Newson
ICDR 4.8-EPU	Attachment 1 (2 of 3)	76	N Y	Page 1 Pages 2-6 Col 1-3; Pages 7-9 Col 1-5; Page 10 Col 1-4; Page 11 Col 1-5;	(d), (e)	Clyde Newson

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				Page 12 Lines 1-4; Page 13 Col 1-11; Pages 14-33 Col 1-3; Pages 34-36 Col 1-5; Page 37 Col 1-4; Page 38 Col 1-5; Page 39 Col 1-4; Page 40 Col 1-12; Pages 41-76 Col 1-3		
ICDR 4.8-EPU	Attachment 1 (3 of 3)	100	N Y	Pages 2, 69-70 Page 1 Col 1-3; Page 3-7 Col 1-3; Page 8 Col 1-4; Page 9 Col 1-5; Pages 10-14 Col 1-2, 6-7, 14-17; Pages 15-16 Col 1-4; Pages 17-18 Col 9-10, 21-25; Page 19 Col 1-6 Line 10; Page 20 Lines 2-5, 7-8, 10-11, 16; Page 21 Col 1-2; Pages 22-24 Col 1-3;	(d), (e)	Clyde Newson

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				Pages 25-27 Col 1-5; Page 28 Line 1 Page 29-30 Col 1-5; Page 31 Col 1-12; Pages 32-68 Col 1-3; Pages 71-74 Col 1-3; Pages 75-85 Col 1-6; Pages 86-94 Col 1-4; Page 95 Col 1-6, 9-12; Pages 96-100 Col 1-6		
ICDR 4.8-EPU	Attachment 2 FPL response to Saporito letter	2	N			
ICDR 4.8-EPU	Supplemental to original responses: ICDR 4.8 Supp (disk 16)	1	N			
ICDR 5	List of Data Request	3	N			
ICDR 5.1	Data Request	2	N			
ICDR 5.1.1-EPU	2010-01 PSL EPU MOPR	1	N			
ICDR 5.1.1-EPU	2010-01 PSL PTN EPU Key Issues Report	1	N			
ICDR 5.1.1-EPU	2010-01 PTN EPU MOPR	1	N			
ICDR 5.1.1-EPU	2010-02 PSL EPU MOPR	1	N			
ICDR 5.1.1-EPU	2010-02 PSL PTN EPU Key Issues Report	1	N			
ICDR 5.1.1-EPU	2010-02 PTN EPU MOPR	1	N			
ICDR 5.1.1-EPU	2010-03 PSL EPU MOPR	1	N			

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ICDR 5.1.1-EPU	2010-03 PSL PTN EPU Key Issues Report	1	N			
ICDR 5.1.1-EPU	2010-03 PTN EPU MOPR	1	N			
ICDR 5.1.3-EPU	FPL Exec Final 1-15-10	33	N Y	Pages 1-8, 10-21, 26-32 Page 9 ALL; Pages 22-25 Line 1; Page 33 Line 1	(d), (e)	Clyde Newson
ICDR 5.1.3-EPU	FPL Exec Final 2-15-10	40	N Y	Pages 1-14, 19-22, 26-28, 34-40 Pages 15-18 Col 1; Pages 23-25 Line 1; Page 29 Line 1; Page 30 Lines 1-2; Page 31 ALL; Pages 32-33 Line 1	(d), (e)	Clyde Newson
ICDR 5.1.3-EPU	FPL Exec Final 3-18-10	1	N			
ICDR 5.1.3-EPU	FPL Exec Final 4-23-10	48	N Y	Pages 1-2, 4-7, 9-10, 17-34, 36, 41-44 Page 3 Line 1; Page 8 Line 1; Page 11 Col 1 Lines 1-2; Page 12 Col 1-2 Lines 1-2; Pages 13-16 Col 1; Page 35 Line 1; Pages 37-38 Line 1; Pages 39-40 Col	(d), (e)	Clyde Newson

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				1-2, Lines 1, Section 1; Pages 45-46 Col 1, Line 1; Page 47 Col 1-2; Page 48 Col 1, Line 1		
ICDR 5.1.4-EPU	Risk Registers 1/4/10	10	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4.EPU	Risk Registers 2/4/10	18	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4 EPU	Risk Registers 2/18/10	15	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4 EPU	Risk Registers 3/11/10	18	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4 EPU	Risk Registers 4/1/10	13	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4 EPU	Risk Registers 4/22/10	18	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4 EPU	Risk Registers 1/4/10	20	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4 EPU	Risk Registers 2/10/10	22	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4 EPU	Risk Registers 3/4/10	23	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4 EPU	Risk Registers 3/16/10	23	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4 EPU	Risk Registers 3/23/10	23	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.4 EPU	Risk Registers 4/12/10	25	Y	ALL	(d), (e)	Clyde Newson
ICDR 5.1.8-EPU	2-8 Final EPU Vendor Integration Meeting 1	95	N Y	Pages 1-7, 11, 14-22, 25-34, 36-95 Pages 8-9 Line 1; Page 10 Lines 1-8; Pages 12-13 Line 1; Pages 23-24 Col 1; Page 35 Line 1	(d), (e)	Clyde Newson
ICDR 5.2 EPU	Data Request	1	N			
ICDR 5.3	Data Request	1	N			

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EPU						
ICDR 5.4 EPU	Data Request	3	N Y	Page 1-2 Page 3 Lines 1-2	(d), (e)	Clyde Newson
ICDR 5.5 EPU	Data Request	1	N			
ICDR 5.6 EPU	Data Request	1	N			
ICDR 5.7 EPU	Data Request	1	N			
ICDR 5.8 EPU	Data Request	1	N			
ICDR 5.9 EPU	Data Request	1	N			
ICDR 5.10 EPU	Data Request	1	N			
ICDR 5.11 EPU	Data Request	1	N			
ICDR 5.12 EPU	Data Request	1	N			
ICDR 5.13 EPU	Data Request	2	Y N	Page 1 Line 1 Page 2	(d), (e)	Clyde Newson
ICDR 5.14 EPU	Data Request	1	N			
ICDR 5.15 EPU	Data Request	1	N			
ICDR 5.16 EPU	Data Request	1	N			
ICDR 5.17 EPU	Data Request	1	Y	Page 1 Lines 1-2	(d), (e)	Clyde Newson
ICDR 5.18 EPU	Data Request	1	N			
ICDR 5.19 EPU	Data Request	1	N			
ICDR 5.20 EPU	Data Request	1	N			
ICDR 5.21 EPU	Data Request	1	Y	Page 1 Lines 1-6	(d), (e)	Clyde Newson
ICDR 5.22 EPU	Data Request	1	N			
ICDR 6	List of Data Request	1	N			
ICDR 6.1	Data Request	1	N			
ICDR 6.2-EPU	FPL response to Office of Public Counsel's First Set of PODS, item 19	149	N Y	Pages 1-12, 136-149 Pages 13-135	(d), (e)	Clyde

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						Newson
ICDR 6.3-EPU	FPL response to Office of Public Counsel's First Set of PODS, item 29	7	N			
ICDR 7	List of Data Request	2	N			
ICDR 7.1-EPU	FPSC Staff Auditor Visit Project Oversight – April 17, 2010	51	N Y	Pages 1-24, 26, 28-37, 40-44, 48, 51 Page 25 Col 1; Page 27 Col 1-5; Page 38-39 Line 1 Col 1-2, Section 1; Page 45 Line 1-3; Page 46 Line 1; Page 47 Line 1-2; Page 49 Lines 1-6; Page 50 Col 1-4	(d), (e)	Clyde Newson
ICDR 8	List of Data Request	2	N			
ICDR 8.1-EPU	1. 25486-200-YDA-MESO-20002.pdf	2	N			
ICDR 8.1-EPU	2. 025486-200-YDA-MESO-20005.pdf	2	N			
ICDR 8.1-EPU	3. 025486-200-YDA-MESO-20007.pdf	3	N			
ICDR 8.1-EPU	4. 25486-200-YDA-MESO-20008.pdf	3	N			
ICDR 8.1-EPU	5. 25486-200-YDA-MESO-20009.pdf	4	N			
ICDR 8.1-EPU	6. 25486-200-YDA-MESW-50001.pdf	2	N			
ICDR 8.1-EPU	7. 25486-200-YDA-MESW-50002.pdf	2	N			
ICDR 8.1-EPU	8. 25486-200-YDA-MESW-50003.pdf	2	N			
ICDR 8.1-EPU	9. 1. 25486-200-YDA-MVOO-30001	3	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
ICDR 8.1-EPU	10. 1. 25486-200-YDA-MVOO-30002.pdf	3	N			
ICDR 8.1-EPU	11. 1. 25486-200-YDA-MVOO-30002.pdf	4	N			
ICDR 8.1-EPU	12. 1. 25486-200-YDA-MVOO-30003.pdf	2	N			
ICDR 8.1-EPU	13. 1. 25486-200-YDA-MVOO-30004.pdf	9	N			
ICDR 8.1-EPU	14. 1. 25486-200-YDA-MVOO-30005.pdf	2	N			
ICDR 8.1-EPU	15. 1. 25486-200-YDA-MESO-20002.pdf	5	N			
ICDR 8.1-EPU	16. ENG-QI-4.10 Supplier Deviation Notices	4	N			
ICDR 8.1-EPU	17. Data Request	1	N			
ICDR 8.1-EPU	18. List of SDNs for 8.1 as of 5.12.10	2	Y	Pages 1-2 Col 1	(d), (e)	Clyde Newson
ICDR 8.1-EPU	19. NAI 001.	2	N			
ICDR 8.1-EPU	20. PO 118241 SDN 14655	4	N			
ICDR 8.1-EPU	21. PO 118241 SDN 14656	4	N			
ICDR 8.1-EPU	22. PO 118241 SDN 14657	7	N			
ICDR 8.1-EPU	23. PO 118241 SDN 14658	2	N			
ICDR 8.1-EPU	24. PO 118241 SDN 14660	2	N			
ICDR 8.1-EPU	25. PO 118241 SDN 14661	2	N			
ICDR 8.1-EPU	26. PO 118241 SDN 17392	1	N			
ICDR 8.1-EPU	27. PO 118241 SDN 17846	1	N			
ICDR 8.1-EPU	28. PO 118241 SDN 20351	6	N			
ICDR 8.1-EPU	29. PO 118328 SDN 17316	4	N			
ICDR 8.1-EPU	30. PO 118328 SDN 18295	3	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
ICDR 8.1-EPU	31. PO 118328 SDN 18297	2	N			
ICDR 8.1-EPU	32. PO 119078 SDN 18015	1	N			
ICDR 8.1-EPU	33. PO 119078 SDN 18016	1	N			
ICDR 8.1-EPU	34. PO 119078 SDN 18017	1	N			
ICDR 8.1-EPU	35. PO 119078 SDN 18018	1	N			
ICDR 8.1-EPU	36. PO 119078 SDN 18018	1	N			
ICDR 8.1-EPU	37. PO 119078 SDN 18020	1	N			
ICDR 8.1-EPU	38. PO 119078 SDN 18021	1	N			
ICDR 8.1-EPU	39. PO 119078 SDN 18022	1	N			
ICDR 8.1-EPU	40. PO 119078 SDN 18034	1	N			
ICDR 8.1-EPU	41. PO 119078 SDN 18350	1	N			
ICDR 8.1-EPU	42. PO 119078 SDN 18447	1	N			
ICDR 8.1-EPU	43. PO 119078 SDN 18449	1	N			
ICDR 8.1-EPU	44. PO 121869 SDN 16016	9	N			
ICDR 8.1-EPU	45. PO 121869 SDN 16016	9	N			
ICDR 8.1-EPU	46. PO 121869 SDN 16017	3	N			
ICDR 8.1-EPU	47. PO 121869 SDN 16956	5	N			
ICDR 8.1-EPU	48. PO 121869 SDN 16957	5	N			
ICDR 8.1-EPU	49. PO 121869 SDN 16958.	4	N			
ICDR 8.1-EPU	50. PO 121869 SDN 16959	10	N			
ICDR 8.1-EPU	51. PO 121869 SDN 2058	3	N			
ICDR 8.1-EPU	52. PO 121869 SDN 17117	2	N			
ICDR 8.1-EPU	53. PO 126227 SDN 18377	3	N			
ICDR 8.1-EPU	54. PO 126227 SDN 20809	3	N	Page 3		
			Y	Page 1 Lines 1-6; Page 2 Lines 1-3	(d), (e)	Clyde Newson

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
ICDR 8.1-EPU	55. PO 126227 SDN 21130	3	Y N	Page 1 Lines 1-5; Page 2 Lines 1-4 Page 3	(d), (e)	Clyde Newson
ICDR 8.1-EPU	56. PO 126453 SDN 20192	2	N Y	Page 1 Page 2 Col 1-5	(d), (e)	Clyde Newson
ICDR 8.1-EPU	57. PO 126453 SDN 20658	4	N			
ICDR 8.1-EPU	58. PO 126453 SDN 20686	4	N			
ICDR 8.1-EPU	59. SDN-25486-200-YDA-MESW -50004	2	N			
ICDR 8.1-EPU	60. SDN-TCW-001	2	N			
ICDR 8.1-EPU	61. SDN-TCW-004	2	N			
ICDR 8.1-EPU	62. SDN-TCW-005	2	N			
ICDR 8.1-EPU	63. SDN-TCW-007	2	N			
ICDR 8.2-EPU	1. Condensate and Feedwater System Design Pressure 9/16/08	5	N			
ICDR 8.2-EPU	2. Evaluation of the Condensate, Heater Drain and Feedwater Pump	55	N			
ICDR 8.2-EPU	3. Data Request	2	N			
ICDR 8.2-EPU	4. PSL EPU BOP Scoping Study (2/27/08)	155	Y	ALL	(d), (e)	Clyde Newson
ICDR 8.2-EPU	5. PTN EPU BOP Scoping Study (2/29/08)	380	Y	ALL	(d), (e)	Clyde Newson
ICDR 8.2-EPU	6. St. Lucie Calculation and Change Notices (5/14/10)	5	N			
ICDR 8.2-EPU	7. St. Lucie Engineering Reports (5/14/10)	3	N			
ICDR 8.2-EPU	8. St. Lucie Final Licensing Report Sections (5/14/10)	3	N			
ICDR 8.2-	9. St. Lucie reports	2	N			

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EPU	and Evaluations (5/14/10)					
ICDR 8.2-EPU	10. Turkey Point Final Calcs and Change Notices	3	N			
ICDR 8.2-EPU	11. Turkey Point Reports and Evaluations	2	N			
ICDR 8.2-EPU	12. Turkey Point Shaw Engineering Reports	2	N			
ICDR 8.3-EPU	Data Request	1	N			
ICDR 8.4-EPU	Data Request	1	N			
ICDR 8.5-EPU	Data Request	1	N			
ICDR 8.5-EPU	PSL FW Heater Decision	1	N			
ICDR 8.5-EPU	PSL MSSV Lifting Decision	4	N Y	Pages 1-2, 4 Page 3 Lines 1-5	(d), (e)	Clyde Newson
ICDR 8.6-EPU	Data Request	1	N			
ICDR 8.7-EPU	Data Request	1	N			
ICDR 8.8-EPU	Data Request	1	N			
ICDR 8.8-EPU	SSW-PTN-2009-000450	66	N			
ICDR 8.9-EPU	Data Request	2	N			
ICDR 8.10-EPU	Data Request	1	Y	Page 1 Lines 1-2, Col 1	(d), (e)	Clyde Newson
ICDR 9-EPU	List of Data Request	2	Y N	Page 1 Lines 1-2 Page 2	(d), (e)	Clyde Newson
ICDR 9.1-EPU	Data Request	2	Y	Page 1 Lines 1-5 Page 2 Line 1	(d), (e)	Clyde Newson
ICDR 9.2-EPU	Data Request	1	N			
ICDR 9.3-EPU	Data Request	1	Y	Page 1 Lines 1-10	(d), (e)	Clyde Newson
ICDR 9.4-EPU	Data Request	1	Y	Page 1 Line 1	(d), (e)	Clyde Newson
ICDR 9.5-EPU	Data Request	1	Y	Page 1 Line 1	(d), (e)	Clyde Newson
ICDR 9.6-	Data Request	1	Y	Page 1 Lines 1-2	(d), (e)	Clyde

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EPU						Newson
ICDR 9.7-EPU	Data Request	1	N			
ICDR 9.8-EPU	Data Request	1	Y	Page 1 Line 1	(d), (e)	Clyde Newson
ICDR 9.9-EPU	Data Request	2	N			
IVS-1	Interview Summary	2	Y	Pages 1-2 Line 1	(d), (e)	Clyde Newson
IVS-2	Interview Summary	1	N			
IVS-3	Interview Summary	3	N			
IVS-4	Interview Summary	1	N			
IVS-5	Interview Summary	2	N			
IVS-6	Interview Summary	2	Y	Page 1 Lines 1-3, 7-8, 11, 13, 17, 25-27, 32, 35	(d), (e)	Clyde Newson
			N	Page 2		
IVS-7	Interview Summary	1	N			
Work Plan-PTN	Work Plan	63	N	Pages 1-14, 20-25, 28, 29, 32-33, 36-43, 45-49, 51, 58-61, 63		
			Y	Page 15 Line 1, Page 16 Lines 1, 6, 12, Page 17 Lines 9, 10, 29-35, Page 18 Lines 1-13, Page 19 Lines 3-6, 16-18, Page 26 Lines 2-4, 6-8, 10, Page 27 Lines 1-5, 7, 9, 12-15, 19-21, Page 30 Lines 1-5, 13-17, Page 31 Lines 3, 5, Pages 34-35 Col 1, Page 44 Lines 8-10, Page 50 Lines 2-4, 6, 11, Page 52 Lines 4-	(d), (e)	Nelda Jacques

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				29, Pages 53-56 ALL, Page 57 Lines 1-11, Page 62 Lines 6-10	(b)	Maria Fogarty
ICDR 1-PTN	List of Data Requests	7	N			
ICDR 1.1	Data Request	2	N			
ICDR 1.2	Data Request	2	N			
ICDR 1.3-PTN	Data Request	4	N			
ICDR 1.4-PTN	Data Request	1	N			
ICDR 1.5-PTN	Data Request	1	N			
ICDR 1.6-PTN	Data Request	1	N			
ICDR 1.7-PTN	Data Request	1	N			
ICDR 1.8-PTN	Data Request	2	N			
ICDR 1.9-PTN	Data Request	7	N			
ICDR 1.10-PTN	Data Request	2	N			
ICDR 1.11-PTN	Data Request	1	N			
ICDR 1.12-PTN	Data Request	1	N			
ICDR 1.13-PTN	Data Request	1	N			
ICDR 1.14b-1 PTN	Data Request	1	N			
ICDR 1.14b-2 PTN	Data Request	1	N			
ICDR 1.14b-3 PTN	Data Request	1	N			
ICDR 1.14b-4-PTN	Data Request	1	N			
ICDR 1.14b-4-PTN	1.14b.4 PTN 6-7 200905 dashboard	1	N			
ICDR 1.14b-4-PTN	1.14b.4 PTN 6-7 200906 dashboard	1	N			
ICDR 1.14b-PTN	1.14b.4 PTN 6-7 200907 dashboard	1	N			

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ICDR 1.14b-PTN	1.14b.4 PTN 6-7 200908 dashboard	1	N			
ICDR 1.14b-PTN	1.14b.4 PTN 6-7 200909 dashboard	1	N			
ICDR 1.14b-PTN	1.14b.4 PTN 6-7 200910 dashboard	1	N			
ICDR 1.14b-PTN	1.14b.4 PTN 6-7 200911 dashboard	1	N			
ICDR 1.14b-5-PTN	Data Request	1	N			
ICDR 1.14b-5-PTN	BEC-COLA-SCA-SCHED 200904	138	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BEC-COLA-SCA-SCHED 200905	139	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BEC-COLA-SCA-SCHED 200906	166	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BVZ-ENGR-SCHED 200904	52	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BVZ-ENGR-SCHED 200905	53	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BVZ-ENGR-SCHED 200906	53	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BVZ-ENGR-SCHED 200907	53	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BVZ-ENGR-SCHED 200908	53	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BVZ-ENGR-SCHED 200909	56	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BVZ-ENGR-SCHED 200910	56	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BVZ-ENGR-SCHED 200911	56	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-5-PTN	BVZ-ENGR-SCHED 200912	56	Y	ALL	(e)	Nelda Jacques
ICDR 1.14b-	Data Request	1	N			

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6-PTN						
ICDR 1.14b-7-PTN	Data Request	1	N			
ICDR 1.14b-7-PTN	200904 Meeting Agenda	1	N			
ICDR 1.14b-7-PTN	200905 Meeting Agenda	1	N			
ICDR 1.14b-7-PTN	200906 Meeting Agenda	1	N			
ICDR 1.14b-7-PTN	200907 Meeting Agenda	1	N			
ICDR 1.14b-7-PTN	200908 Meeting Agenda	1	N			
ICDR 1.14b-7-PTN	200909 Meeting Agenda	1	N			
ICDR 1.14b-7-PTN	200910 Meeting Agenda	1	N			
ICDR 1.14b-7-PTN	200911 Meeting Agenda	1	N			
ICDR 1.14b-7-PTN	200912 Meeting Agenda	1	N			
ICDR 1.14b-10-PTN	Data Request	1	N			
ICDR 1.15b-PTN	LEV1-Sum-Sched-123009	1	Y	ALL	(e)	Nelda Jacques
ICDR 1.15c-PTN	1.15C NFR Summary	1	N			
ICDR 1.15a-PTN	Attachment 1.15a SCA RAI Approval Log	1	N			
ICDR 1.15a-c	Data Request	1	N			
ICDR 1.16a-PTN	First Amendment to Manufacturing Reservation Agreement 11NOV09(2)	1	Y	ALL	(e)	Nelda Jacques
ICDR 1.16a-b-PTN	Data Request	1	N			

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ICDR 1.17-PTN	WOOLPERT LLP – PO 450049361	6	Y	ALL	(d), (e)	Nelda Jacques
ICDR 1.17-PTN	ECOLOGICAL ASSOCIATES – Single Source_EAI_04-14-08	1	Y	Page 1 Line 1	(d), (e)	Nelda Jacques
ICDR 1.17-PTN	FPL Final Turkey Point PO	5	Y	ALL	(d), (e)	Nelda Jacques
ICDR 1.17-PTN	BVZ – SSJ for BVZ	3	Y Y Y	Page 1 Lines 1-3, 5 Page 2 Line 1 Page 3 ALL	(d), (e) (d), (e) (d), (e)	Nelda Jacques
ICDR 1.17-PTN	PO 4500452285 CO1	3	Y	ALL	(d), (e)	Nelda Jacques
ICDR 1.17-PTN	PO4500452285 CO2	3	Y	ALL	(d), (e)	Nelda Jacques
ICDR 1.17-PTN	LUNTZ – Original Document 09-040 New Nuclear Messaging SOW	11	Y	ALL	(d), (e)	Nelda Jacques
ICDR 1.17-PTN	PO 4500533357	6	Y	ALL	(d), (e)	Nelda Jacques
ICDR 1.18-PTN	Data Request	1	N			
ICDR 1.19-PTN	Data Request	1	N			
ICDR 1.20-PTN	Data Request	1	N			
ICDR 1.21-PTN	Data Request	1	N			
ICDR 1.22-PTN	Data Request	1	N			
ICDR 1.23-PTN	Data Request	1	Y	ALL	(d), (e)	Nelda Jacques
ICDR 1.24a-b-PTN	Data Request	1	N			
ICDR 1.25-PTN	Data Request	2	Y	ALL	(d), (e)	Nelda Jacques
ICDR 1.26-PTN	Data Request	1	N			
ICDR 1.27-PTN	Data Request	1	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
ICDR 1.28-PTN	Data Request	1	N			
ICDR 2-PTN	List of Data Requests	1	N			
ICDR 2.1-PTN	Data Requests	2	N			
ICDR 2.2-PTN	Data Request	1	N			
ICDR 2.3-PTN	Data Request	1	N			
ICDR 2.4-PTN	Data Request	1	N			
ICDR 2.5-PTN	Data Request	1	N			
ICDR 3-PTN	Notice of Intent	2	N			
ICDR 3.2-PTN	Data Request	1	N			
ICDR 3.3-PTN	Data Request	1	N			
ICDR 3.4-PTN	Data Request	1	N			
ICDR 3.5-PTN	Data Request	1	N			
ICDR 3.6-PTN	Data Request	1	N			
ICDR 3.7-PTN	Data Request	1	N			
ICDR 3.8-PTN	Data Request	1	N			
ICDR 3.9-PTN	Data Request	1	N			
ICDR 3.10-PTN	Data Request	1	N			
ICDR 3.11-PTN	Data Request	1	N			
ICDR 3.12-PTN	Data Request	1	N			
ICDR 3.13-PTN	Data Request	1	N			
ICDR 4-PTN	Notice of Intent	2	N			
ICDR 4.1-PTN	Data Request	1	N			
ICDR 4.2-PTN	Data Request	1	Y	Page 1 Lines 1-2	(d), (e)	Nelda Jacques
ICDR 4.3-PTN	Data Request	1	N			
ICDR 4.4-PTN	Data Request	1	N			
ICDR 4.5-	Data Request	1	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
PTN						
ICDR 4.6-PTN	Data Request	1	N			
ICDR 4.7-PTN	Data Request	2	N			
ICDR 4.8-PTN	Data Request	1	N			
ICDR 4.9-PTN	Data Request	1	N			
ICDR 5-PTN	Notice of Intent	2	N			
ICDR 5.1-PTN	Data Request	1	N			
ICDR 5.2-PTN	Data Request	1	N			
ICDR 5.3-PTN	Data Request	1	N			
ICDR 5.4-PTN	Data Request	1	N			
ICDR 5.5-PTN	Data Request	1	N			
ICDR 5.6-PTN	Data Request	1	N			
ICDR 5.7-PTN	Data Request	1	N			
ICDR 5.8-PTN	Data Request	1	N			
ICDR 5.9-PTN	Data Request	1	N			
ICDR 5.10-PTN	Data Request	2	Y	ALL	(d), (e)	Nelda Jacques
ICDR 5.11-PTN	Data Request	1	N			
ICDR 6-PTN	Notice of Intent	2	N			
ICDR 7-PTN	Notice of Intent	2	N			
ICDR 8-PTN	Notice of Intent	2	N			
ICDR 8.1-PTN	Data Request	1	N			
ICDR 8.2-PTN	Data Request	1	N			
ICDR 8.3-PTN	Data Request	1	N			
ICDR 8.4-PTN	Data Request	1	N			
	Project Timeline New Nuclear	1	N			
	Turkey Point 6&7 Cumulative Costs	1	N			
	Turkey Point 6&7	1	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
	Determination of Need					
	Turkey Point 6&7 Estimated In Service Cost	1	N			
	Turkey Point 6&7 Milestones	1	N			
	Turkey Point 6&7 COL Review Schedule	1	N			
IVS-8	Interview Summary	3	N			
IVS-9	Interview Summary	1	N			
IVS-10	Interview Summary	2	N			
IVS-11	Interview Summary	2	N			
IVS-12	Interview Summary	3	N	Page 1	(d), (e)	Nelda Jacques
			Y	Page 2 Lines 1-10		
				Page 3 Line 1		
IVS-13	Interview Summary	1	N			
ICDR 10	Work Paper	8	Y	ALL	(b), (d), (e), (f)	Clyde Newson
ICDR 10.9	Project Invoice Instructions	44	Y	ALL	(e)	Clyde Newson
ICDR 10.9	Feasibility Analysis Back Up Detail	392	Y	ALL	(e)	Clyde Newson
ICDR 10.9	Site Layout Report	117	Y	ALL	(e)	Clyde Newson
ICDR 10.9	Capital Cost Estimate Revisions	68	Y	ALL	(e)	Clyde Newson
ICDR 10.9	PTN 6&7 Cost Analysis	22	Y	ALL	(e)	Clyde Newson
ICDR 10.9	Project Cost Analysis	19	Y	ALL	(e)	Clyde Newson
ICDR 10.9	PTN Cash Flow; Economic Feasibility Results	170	Y	ALL	(e)	Clyde Newson
ICDR 10.9	Capital Budget Summaries, Dashboards, Scope and Risk Trends, Vendor Integration Meetings	289	Y	ALL	(e)	Clyde Newson
IVS-14	Interview Summary	2	Y	All	(e)	Clyde Newson

EXHIBIT D

DOCUMENT NUMBER-DATE
5908 JUL 19 9
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost)
Recovery Clause)

DOCKET NO. 100009-EI

STATE OF FLORIDA)
PALM BEACH COUNTY)

AFFIDAVIT OF NELDA JACQUES

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

1. My name is Nelda Jacques. I am currently employed by Florida Power & Light Company ("FPL") as Lead Professional, Construction. 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 Staff's audit workpapers for the Review of Florida Power & Light's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects, for which I am listed as the affiant. The documents and materials that I have reviewed contain proprietary confidential business information, including contractual data and competitively sensitive data. Disclosure of this information would violate FPL's contracts with its vendors, work to the detriment of FPL's competitive interests, impair the competitive interests of its vendors and/or impair FPL's efforts to enter into contracts on commercially favorable terms. 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.

Nelda Jacques

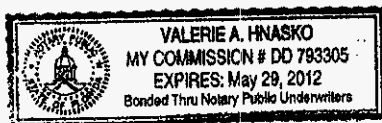
Nelda Jacques

SWORN TO AND SUBSCRIBED before me this 19 day of July 2010, by Nelda Jacques, who is personally known to me or who has produced _____ (type of identification) as identification and who did take an oath.

Valerie A. Hnasko

Notary Public, State of Florida

My Commission Expires:



DOCUMENT NUMBER-DATE

05908 JUL 19 2010

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost)
Recovery Clause)

DOCKET NO. 100009-EI

STATE OF FLORIDA)
MIAMI-DADE COUNTY)

AFFIDAVIT OF MARIA FOGARTY

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

1. My name is Maria Fogarty. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Internal Auditing. 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 concerning Staff's workpapers for its Review of Project Management Internal Controls, for which I am identified on Exhibit C as the affiant. The documents or materials that I have reviewed contain information related to reports of internal auditors. 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 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. 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.

Maria Fogarty

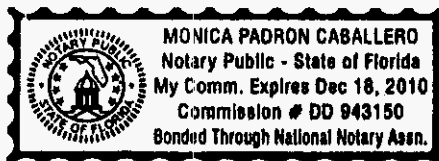
Maria Fogarty

SWORN TO AND SUBSCRIBED before me this 19 day of July 2010, by Maria Fogarty who is personally known to me or who has produced known (type of identification) as identification and who did take an oath.

Monica P. Caballero

Notary Public, State of Florida

My Commission Expires:



DOCUMENT NUMBER DATE
05908 JUL 19 2010
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost)
Recovery Clause)

DOCKET NO. 100009-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT OF CLYDE NEWSON

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

1. My name is Clyde Newson. I am currently employed by Florida Power & Light Company ("FPL") as Cost Recovery Specialist, Extended 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 Staff's audit workpapers for the Review of Florida Power & Light's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects, for which I am listed as the affiant. The documents and materials that I have reviewed contain proprietary confidential business information, including contractual data and competitively sensitive data. Disclosure of this information would violate FPL's contracts with its vendors, work to the detriment of FPL's competitive interests, impair the competitive interests of its vendors and/or impair FPL's efforts to enter into contracts on commercially favorable terms. The documents also include materials related to certain personnel changes within the Extended Power Uprate organization, which reflects employee personnel information that is unrelated to compensation, duties, qualifications, or responsibilities. Disclosure of this private information could have an adverse impact on employee satisfaction with the company and could cause employees to seek employment elsewhere, resulting in the loss of highly skilled and trained employees and/or hindering FPL's ability to attract new talent. Additionally, information related to an internal investigation of an employee complaint is included. Disclosure of this information would adversely impact the Company's willingness to conduct such investigations and share the results with Staff. Additionally, because the investigation included interviews with employees, public disclosure could have a chilling effect on employees' willingness to report concerns or otherwise fully cooperate with such investigations. 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.

DOCUMENT NUMBER-DATE

15908 JUL 19 9

FPSC-COMMISSION CLERK

4. Affiant says nothing further.

Clyde T. Newson
Clyde Newson

SWORN TO AND SUBSCRIBED before me this 19th day of July 2010, by Clyde Newson, who is personally known to me or who has produced _____ (type of identification) as identification and who did take an oath.

Jo Retha Forbes
Notary Public, State of Florida

My Commission Expires:

