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July 27, 2015

**VIA HAND DELIVERY**

Ms. Carlotta S. Stauffer  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
15 JUL 27 PM 2:23  
COMMISSION  
CLERK

**REDACTED**

**Re: Docket No. 150000  
Electric Reliability Reporting by Florida Electric IOUs**

Dear Ms. Stauffer:

I enclose for filing in the above docket an original and seven (7) copies of Florida Power & Light Company's ("FPL's") Amended Request for Confidential Classification of Review of Data Accuracy in Electric Reliability Reporting by Florida Electric IOUs. The original includes Exhibits A, B (two copies), Exhibit C and Exhibit D. The seven copies do not include copies of the Exhibits.

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 Amended Request for Confidential Classification. Exhibit D contains one affidavit in support of FPL's Amended Request for Confidential Classification.

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

Sincerely,

Scott A. Goorland

Enclosure

cc: Carl Vinson, Jr., Florida Public Service Commission

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AFD \_\_\_\_\_  
APA 5+CO+Redacted  
ECO \_\_\_\_\_  
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GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
TEL \_\_\_\_\_  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of Data Accuracy in Electric  
Reliability Reporting by Florida IOUs

Docket No: 150000  
Date: July 27, 2015

**FLORIDA POWER & LIGHT COMPANY'S  
AMENDED REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") submit this Amended Request for confidential classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to the Commission's Review of Data Accuracy in Electric Reliability Reporting by Florida Electric IOUs (the "Audit"). In support of this Amended Request, FPL states as follows:

1. By letter dated June 24, 2015, Staff provided its draft Audit Report, including audit work papers. Pursuant to Rule 25-22.006(3)(a), FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the Audit Report and work papers.

2. On July 15, 2015, FPL filed a Request for Confidential Classification with respect to the Audit Report and work papers. Subsequent to this filing, Staff contacted FPL to provide revisions to the Audit Report. The revised Audit Report no longer contained confidential information. As such, only the work papers contained confidential information. Accordingly, FPL is filing this Amended Request for Confidential Classification.

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

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

b. Exhibit B consists of a copy of the confidential materials, on which all the information that is entitled to confidential treatment under Florida law has been redacted.

c. Exhibit C is a table that identifies the specific line, field or page references to the confidential materials for which FPL seeks confidential treatment. The table also references the specific statutory bases for confidentiality and the affiants who support the requested classification.

d. Exhibit D contains the affidavit of David T. Bromley.

4. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3). This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

5. As further detailed in the affidavit included as Exhibit D, certain documents contain information concerning internal auditing controls and reports of internal auditors. This information is protected by Section 366.093(3)(b), Fla. Stat.

6. In addition the documents or materials contain information concerning contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. Specifically, the information contains benchmarking analyses which FPL is required to maintain as confidential by contractual agreement. This information is protected by Section 366.093(3)(d), Fla. Stat. This information

also relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

**WHEREFORE**, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its Amended Request for Confidential Classification be granted.

Respectfully submitted,

Scott A. Goorland  
Senior Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 304-5633  
Facsimile: (561) 691-7135  
Email: scott.goorland@fpl.com

By: \_\_\_\_\_

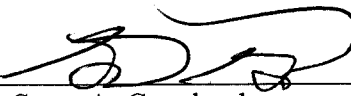
  
Scott A. Goorland  
Florida Bar No. 0066834

**CERTIFICATE OF SERVICE**  
**Docket No. 150000**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing\* has been furnished by hand delivery on this 27<sup>th</sup> day of July, 2015 to the following:

Carl S. Vinson, Jr.  
Public Utilities Supervisor  
Office of Auditing and Performance Analysis  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

By: \_\_\_\_\_



Scott A. Goorland  
Florida Bar No. 0066834

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

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

**EXHIBIT B**

**REDACTED COPIES**

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FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT

4 TO: Mr. Dave Bromley **CONFIDENTIAL**

5 UTILITY: Florida Power & Light Company Lynn Fisher  
6 **AUDIT MANAGER**

7 FROM: Lynn Fisher

8 REQUEST NUMBER: DR-2 DATE OF REQUEST: 2/26/15

9 AUDIT PURPOSE: To review electric service reliability data collection and reporting.

10 REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: 3/10/15

11 REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY  
X OUTSIDE OF AN INQUIRY

12

13 DR-2.1 Please provide two paper copies of the following internal audit reports (requested confidential by company):  
14 a. The [redacted] and [redacted] reports in response to DR-1.1b;  
15 b. The [redacted] and [redacted] internal audit reports in response to DR-1.4b;  
16 c. The [redacted] and [redacted] reports in response to DR-1.31.  
17 d. The 2011-201 [redacted] Benchmark Studies provided in response to DR-1.32.

18 DR-2.2 Provide a summary showing the total number of verification/validation audits conducted monthly for the Pole Inspection  
19 Program, during the period 2010-2015 to date. (ref. DR-1.1b)

20 DR-2.3 a. Provide a summary showing the total number of audit/surveys conducted monthly for the Joint Use Pole Inspection  
21 Program, during the period 2010-2015 to date. (ref. DR-1.8)

22 DR-2.4 a. Provide a summary showing the total number of Transmission random sample verification audits conducted monthly for  
23 the Transmission Structure Inspection Program, during the period 2010-2015 to date. (ref. DR-1.10)

24 DR-2.5 Provide a list of any ongoing or planned audits of FPL's Pole Inspection Program, Vegetation Management Program, Storm  
25 Hardening Program, or Annual Reliability Reporting, during 2015.

26 DR-2.6 Please provide a copy of the most current Pole Inspection Deployment Plan.



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FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT

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TO: Mr. Dave Bromley **CONFIDENTIAL** Lynn Fisher  
UTILITY: Florida Power & Light Company AUDIT MANAGER

FROM: Lynn Fisher

DATE OF REQUEST: 4/29/15

REQUEST NUMBER: DR-4  
AUDIT PURPOSE: To review electric service reliability data collection and reporting.

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: 5/4/15

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY  
X OUTSIDE OF AN INQUIRY

DR-4.1 a. Please provide [redacted] on [redacted] completed in [redacted] discussed in the 4/24/15 conference call.  
b. Please provide [redacted] completed in [redacted] on [redacted] discussed in the 4/24/15 conference call.

DR-4.2 a. Provide an explanation of the reasons why FPL did not complete QA validation/verification reviews for the Pole Inspection Program and joint use poles during 2010-2011.  
b. Discuss why changes were made to re-implement the QA process again in 2013, and why it continues today.

TO: AUDIT MANAGER \_\_\_\_\_ DATE: \_\_\_\_\_

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEM(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED; (SEE ATTACHED MEMORANDUM)

\_\_\_\_\_  
SIGNATURE AND TITLE OF RESPONDENT

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FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT

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TO: Mr. Dave Bramley

UTILITY: Florida Power & Light Company

Lynn Fisher  
AUDIT MANAGER

CONFIDENTIAL

FROM: Lynn Fisher

DATE OF REQUEST: 4/29/15

REQUEST NUMBER: DR-4

AUDIT PURPOSE: To review electric service reliability data collection and reporting.

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: 5/4/15

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY

OUTSIDE OF AN INQUIRY

DR-4.1 a. Please provide [redacted] on [redacted] completed in [redacted] discussed in the 4/24/15 conference call.  
b. Please provide [redacted] completed in [redacted] on [redacted] discussed in the 4/24/15 conference call.

DR-4.2 a. Provide an explanation of the reasons why EPL did not complete QA validation/verification reviews for the Pole Inspection Program and joint use poles during 2010-2011.  
b. Discuss why changes were made to re-implement the QA process again in 2013, and why it continues today.

TO: AUDIT MANAGER LYNN FISHER DATE: 5/4/15

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEM(S) 4.1 a & b IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Lynn T. Bramley  
SIGNATURE AND TITLE OF RESPONDENT

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**Office of Auditing and Performance Analysis  
Document Summary and Control Log**

Company: Florida Power & Light Company  
 Area: Electric Reliability Reporting Review  
 Auditor(s): L. Fisher

Workload Control #: PA-15-01-003  
 File Name: I:\PERFORMANCE ANALYSIS SECTION\00\PERFORMANCE ANALYSIS AUDIT\Electric Reliability Reporting Review\Workpapers\3.3 Document Summaries\DSL DR-1.doc

Document: DR-1.1  
 Date Requested: 1/6/15  
 Date Received: 1/6/15  
 Comments: (i.e., Confidential)

Document Title and Purpose of Review: a. Please describe in detail the processes for planning, tracking, and auditing/validating the company's wood pole inspection results. b. Please provide all audits conducted on the wood pole inspection process over the first eight-year cycle.

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Summary of Contents: a. FPL inspects approx. 1/8 of the total 1.2 million distribution poles annually. FPL has nine management areas as zones and annually performs pole inspections/necessary remediation in each zone; FPL and AT&T partner w/pole inspection vendor to ensure FPL/AT&T joint use poles are also inspected; Ranking/priority criteria used to determine which poles to inspect annually include: last inspection date, reliability (outage and momentary history), customer base, geographical/historic data (coastal areas, grade B vs. C construct. Older poles); Vendor uses mobile computing technology to record inspection data results and calculate poles strength and loading conditions; data is transferred to FPL Asset Management System (AMS) and the GIS; Inspection Metrics tracked include: number/percentage of poles reinforced/replaced due to decay/overload, number of joint use poles identified requiring transfer, number of inaccessible locations, poles inspected, and inspection/ remediation costs (budget vs. actual); Monthly, FPL selects 500 poles to verify/validate vendor inspection results to ensure FPL agrees w/inspection assessments, safety hazards are adequately addressed, inspection data is properly recorded, and contractor invoicing is accurate; b. An example of a monthly random sample report provides the year, month, management area, substation, pole number, unique ID, GPS coordinate, location, reason for non-compliance, and feedback from vendor; Feedback from the pole inspection vendor is included in response to non-compliant poles identified by the vendor. Confidential [redacted] and [redacted] were made available in FPL Tallahassee offices for staff review. FPL also provided a listing of all verification/validation audits completed in the Tallahassee office.

Conclusions:  
 Data Request(s) Generated:  
 No. Description  
 No. Description  
 Follow-up Required:

Document: DR-1.2  
 Date Requested: 1/6/15  
 Date Received: 1/6/15  
 Comments: (i.e., Confidential)

Document Title and Purpose of Review: Please provide the budgeted and actual expenditures for wood pole inspection activities for each year 2010 through 2014, and projected 2015.

Summary of Contents: Budgeted and actual expenditures for 2010 through 2014 and projected 2015 are:

Year	Budget	Actual
2010	\$52.1	\$50.0
2011	66.8	67.0
2012	65.5	67.5
2013	68.8	69.7
2014	69.5	70.1
2015	55.8	

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	1	Conclusions:
	2	Data Request(s) Generated:
	3	No. _____ Description:
	4	No. _____ Description:
	5	Follow-up Required:
6		Document: DR-1.3
7		Date Requested: 1/6/15
8		Date Received: 1/6/15
9		Comments: (i.e., Confidential)
		Document Title and Purpose of Review: Please describe any changes that are being considered to the company's wood pole inspection processes and activities.
		Summary of Contents: No changes are being considered by the company at this time.
	10	Conclusions:
	11	Data Request(s) Generated:
	12	No. _____ Description:
	13	No. _____ Description:
	14	Follow-up Required:
15		Document: DR-1.4
16		Date Requested: 1/6/15
17		Date Received: 1/6/15
18		Comments: (i.e., Confidential)
		Document Title and Purpose of Review: a. Please describe in detail the processes for planning, tracking, and auditing/validating the company's vegetation management results. b. Please provide all audits conducted on the vegetation management process over the first <u>eight-year cycle</u> .
	19	Summary of Contents: a. Annually, FPL trims approximately 1/3 of its feeders (3 yr. average cycle) and 1/6 (6 yr. average cycle);
	20	FPL also has a mid-cycle program to address feeder conditions requiring trimming prior to the next 3-yr. cycle trim (for fast growing species); All feeders are assigned a 1, 2, or 3 to the year of the cycle they are trimmed; feeders are ranked/prioritized based on historical reliability performance; Laterals recently trimmed are removed from the list and laterals not yet trimmed are moved up in priority rank; As FPL tree contractors complete planned tree trimming, FPL's Work Management System (WMS) is updated to reflect plan progress; Actual miles trimmed is compared to the planned trim and budgeted costs to ensure miles actually trimmed and costs are in line w/budget expenditures; W/in 30 days of vendor notification that work is complete, <u>100% of vendor completed feeder work is inspected by FPL employees, to ensure work is consistent w/FPL plan/standards and is appropriately recorded;</u>
	21	NOI Requests DR-1.4b information in FPL Tallahassee offices to be held confidential during the audit.
22		<b>CONFIDENTIAL</b>
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	25	<u>For laterals FPL selects, inspects, and validates a sample of completed lateral trimming; to ensure conformance and compliance w/FPL plan/standards;</u>
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	29	b. FPL will list applicable verification/validation audits and internal audits conducted (for the first inspection cycle); copies of the internal audits and a sample of each verification/validation audit are provided in FPL Tallahassee offices for review; examples of the 100% feeder validation audits and random sample lateral validation audits are attached; An example of the Vegetation Management
	30	Quality Control & Compliance PM Inspection Forms (Feeder Validation) were attached; Confidential [redacted] and [redacted]
	31	[redacted] were made available in FPL Tallahassee offices for staff review. FPL also provided a listing of all verification/validation audits completed in the Tallahassee office.
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	35	Conclusions:
	36	Data Request(s) Generated:
	37	No. _____ Description:
	38	No. _____ Description:
	39	Follow-up Required:

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	1	Data Request(s) Generated:
	2	No. Description:
	3	No. Description:
	4	Follow-up Required:
5	5	Document Title and Purpose of Review: For the period 2010 to date, please provide a copy of all studies, audits, or assessments to ensure that the reliability indices are being implemented as prescribed.
6	6	Document: DR-1.31
7	7	Date Requested: 1/6/15
8	8	Date Received: 1/6/15
	8	Comments: (i.e., Confidential)
	9	Summary of Contents: See FPL's response to DR-1.27; Confidential internal audit reports dated [redacted] and [redacted] are available for review in FPL's Tallahassee office.
	9	CONFEIDENTIAL
	9	Conclusions:
	10	Data Request(s) Generated:
	11	No. Description:
	12	No. Description:
	13	Follow-up Required:
14	14	Document Title and Purpose of Review: For the period 2010 to date, please provide a copy of all benchmarking analyses performed on the company's reliability indices, including systems and databases used to track reliability information.
15	15	Date Requested: 1/6/15
16	16	Date Received: 1/6/15
17	17	Comments: (i.e., Confidential)
	17	Summary of Contents: Confidential reports from [redacted] and [redacted] are available for review in FPL's Tallahassee office.
	18	CONFEIDENTIAL
	18	Conclusions:
	19	Data Request(s) Generated:
	20	No. Description:
	21	No. Description:
	22	Follow-up Required:
23	23	Document Title and Purpose of Review: Please describe how service reliability complaints to the company and the Commission are used to assess the accuracy of service reliability data or the adequacy of customer service.
24	24	Date Requested: 1/6/15
25	25	Date Received: 1/6/15
26	26	Comments: (i.e., Confidential)
	27	Summary of Contents: Service reliability complaints are not used to assess the accuracy of service reliability data, but service reliability data (outages and momentaries) is used to confirm and assess service reliability complaints. Investigations of service reliability complaints/issues can result in opportunities to improve customer reliability through identifying necessary repairs, targeted tree trimming, equipment upgrades, etc.
	28	Conclusions:
	29	Data Request(s) Generated:
	30	No. Description:
	31	No. Description:
	32	Follow-up Required:
34	34	Document Title and Purpose of Review: a. Please discuss the increases in FPL SAIDI during the period 2006-2011 and the changes made to reduce SAIDI levels during 2012-2013. b. Please discuss any FPL efforts and changes made to reduce SAIDI during the period 2008-2013. c. Please discuss FPL efforts and changes made to reduce MAIFIE during the period 2010-2013. d. Please discuss FPL efforts and changes made to reduce CEMI5 during the period 2008-2013. e. Please discuss the causes of increased FPL CAIDI during 2009-2013 and any planned changes to further reduce CAIDI in the future. f. Please describe any changes in systems, processes, controls, measurements, or calculation methodology used to improve results discussed in response to
35	35	Date Requested: 1/6/15
36	36	Date Received: 1/6/15
37	37	Comments: (i.e., Confidential)
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**Office of Auditing and Performance Analysis  
Document Summary and Control Log**

Company: <u>Florida Power &amp; Light Company</u>	Workload Control #: <u>PA-14-10-004</u>
Area: <u>Electric Reliability Reporting Review</u>	File Name: <u>I:/PERFORMANCE ANALYSIS SECTION/00PERFORMANCE ANALYSIS AUDITS/Electric Reliability Reporting Review/Workpapers/3.3Document Summaries/DSL DR-2.doc</u>
Auditor(s): <u>L. Fisher</u>	

7 Document: DR-2.1	7 Document Title and Purpose of Review: Please provide two paper copies of the following [redacted] (requested
8 Date Requested: 2/26/15	8 confidential by company):
9 Date Received: 3/10/15	9 a. The [redacted] and [redacted] in response to DR-1.1b.
10 Comments: (i.e., Confidential)	10 b. The [redacted] and [redacted] in response to DR-1.4b.
CONFIDENTIAL	11 c. The [redacted] and [redacted] in response to DR-1.31.
	12 d. The [redacted] and [redacted] provided in response to DR-1.32.
	13 Summary of Contents: Audits and benchmarking studies were reviewed and returned to company (a,b,c,d);
	14 Conclusions:
	15 Data Request(s) Generated:
	16 No. _____ Description:
	17 No. _____ Description:
	18 Follow-up Required:

19 Document: DR-2.2	19 Document Title and Purpose of Review:
20 Date Requested: 2/26/15	20 Provide a summary showing the total number of verification/validation audits conducted monthly for the Pole Inspection Program,
21 Date Received: 3/10/15	21 during the period 2010-2015 to date. (ref. DR-1.1b)
22 Comments: (i.e., Confidential)	22 Summary of Contents: Chart of Pole Inspection Random Sample Verification/Validation Audits 2010-2015 (Feb.)
	23 Conclusions:
	24 Data Request(s) Generated:
	25 No. _____ Description:
	26 No. _____ Description:
	27 Follow-up Required:

28 Document: DR-2.3	28 Document Title and Purpose of Review:
29 Date Requested: 2/26/15	29 a. Provide a summary showing the total number of audit/surveys conducted monthly for the Joint Use Pole Inspection Program,
30 Date Received: 3/10/15	30 during the period 2010-2015 to date. (ref. DR-1.8)
31 Comments: (i.e., Confidential)	31 Summary of Contents: summary of annual joint-use audits/surveys of approximately 20% of joint use poles 2010-2015.
	32 Conclusions:
	33 Data Request(s) Generated:
	34 No. _____ Description:
	35 No. _____ Description:
	36 Follow-up Required:

37 Document: DR-2.4	37 Document Title and Purpose of Review:
38 Date Requested: 2/26/15	38 a. Provide a summary showing the total number of Transmission random sample verification audits conducted monthly for the
39 Date Received: 3/10/15	39 Transmission Structure Inspection Program, during the period 2010-2015 to date. (ref. DR-1.10).

CONFIDENTIAL

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**Office of Auditing and Performance Analysis  
Document Summary and Control Log**

Company: <u>Florida Power &amp; Light Company</u>	Workload Control #: <u>PA-15-01-003</u>
Area: <u>Electric Reliability Reporting Review</u>	File Name: <u>I:/PERFORMANCE ANALYSIS SECTION\00PERFORMANCE ANALYSIS AUDITS\Electric Reliability Reporting Review\Workpapers\3.3 Document Summaries\DSL DR-4.doc</u>
Auditor(s): <u>L. Fisher</u>	

7 Document: DR-4.1	7 Document Title and Purpose of Review:
8 Date Requested: 4/29/15	8 a. Please provide FPL's [redacted] on [redacted] completed in [redacted] discussed in the 4/24/15 conference call.
9 Date Received: 5/4/15	9 b. Please provide FPL's [redacted] completed in [redacted] on [redacted], discussed in the 4/24/15 conference call.
10 Comments: (i.e., Confidential)	10 Summary of Contents:
11 CONFIDENTIAL	11 a. Company provided [redacted] (returned to company).
	12 b. Company provided [redacted] (returned to company).
	13 Conclusions:
	14 Data Request(s) Generated:
	15 No. _____ Description:
	16 No. _____ Description:
	17 Follow-up Required:

18 Document: DR-4.2	18 Document Title and Purpose of Review:
19 Date Requested: 4/29/15	19 a. Provide an explanation of the reasons why FPL did not complete QA validation/verification reviews for the Pole Inspection Program and joint use poles during 2010-2011.
20 Date Received: 5/4/15	20 b. Discuss why changes were made to re-implement the QA process again in 2013, and why it continues today.
21 Comments: (i.e., Confidential)	21 Summary of Contents:
	22 a. Company responded that as provided in DR 2.2, the last seven months of 2010 and February and March 2011, no QA validation/verification audits were conducted due to the team (performing the audits) being disbanded, early retirements, and business unit reorganization; in April 2011, QA audits were re-established; In August and September 2011 the resources performing QA audits were temporarily reassigned to perform a pole pulling survey; according to data provided, from October 2011 to March 2015 FPL averaged the QA validation/verification audit target of 500 per month.
	23 b. The QA verification/validation audits were reestablished in April 2011; FPL believed /believes the QA audits help maintain the integrity of the pole inspection program and pole population.
	24 Conclusions:
	25 Data Request(s) Generated:
	26 No. _____ Description:
	27 No. _____ Description:
	28 Follow-up Required:
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A B C D E F G H I J K L M N O P Q R

Tony Maceo Questions

2 [REDACTED] (DR-1.1b)

3 The [REDACTED] followed a [REDACTED] and [REDACTED] requested by Distribution  
4 Management.

5 1. Were the [REDACTED] and [REDACTED] requested by Distribution Management; over [REDACTED]  
6 [REDACTED] of a specific nature?

7 2. Were the [REDACTED] reviewed in [REDACTED] and the [REDACTED] considered  
8 adequate with recommendation for improvement as was the [REDACTED]

9 3. Was the [REDACTED] due to [REDACTED] in the [REDACTED]  
10 and [REDACTED] that continued unresolved into [REDACTED] and  
11 [REDACTED]

12 4. Was there any concern expressed of [REDACTED]

13 5. Were there any concerns of [REDACTED] that would impact [REDACTED]  
14 [REDACTED] to the FPSC?

15 6. Was the ultimate conclusion that differences [REDACTED] and the [REDACTED]  
16 [REDACTED] were caused by [REDACTED]

17 [REDACTED] (DR-1.1b)

18 1. a. Was the Green Belt quality project mentioned [REDACTED] completed in [REDACTED]  
19 [REDACTED] as estimated?  
20 b. If so, what were the results of the [REDACTED]  
21 c. If not, why was the [REDACTED]

22 2. Did the [REDACTED] resolve all issues and management concerns related to the  
23 [REDACTED] and [REDACTED] through  
24 [REDACTED]

25 3. Has Internal Audit conducted any additional [REDACTED] or [REDACTED]  
26 [REDACTED] related audits since [REDACTED] or does it have any planned audits of  
27 this nature within the 2015-2016 timeframe?

28 4. Are there any current investigations or attorney-client engagements related to the [REDACTED] or  
29 any [REDACTED]

30 [REDACTED]



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A B C D E F G H I J K L M N O P Q R S

- 1 1. The [redacted] look at [redacted] and [redacted] was in regards to [redacted] and the
- 2 [redacted] that [redacted]
- 3 customer counts on some tickets were [redacted]
- 4 a. Who expressed the [redacted] (employee, manager, other
- 5 department?)
- 6 b. Was the [redacted] in the [redacted] alleged to be [redacted]
- 7 [redacted]
- 8 c. The term [redacted] was used in the [redacted] as a potential reason
- 9 dispatchers made [redacted] Is that technique used in today's environment,
- 10 and would [redacted]
- 11 d. Is the same condition of [redacted]
- 12 [redacted] being limited to [redacted] the same [redacted] s it was during [redacted]
- 13 e. Were the [redacted]
- 14 [redacted] from across the entire company or within specific areas? (explain if [redacted]
- 15 [redacted])
- 16 f. How were the [redacted] when the [redacted]
- 17 [redacted] states they could not be [redacted]
- 18 or [redacted]
- 19 g. Once the dispatcher's Partners in Performance [redacted] and [redacted] were
- 20 removed in [redacted] were there [redacted]

- 21 [redacted]
- 22 1. The IA statement in the first paragraph seems to indicate that [redacted]
- 23 [redacted] all the [redacted] as suggested in the [redacted]
- 24 [redacted] Please explain whether [redacted]
- 25 by the time of the [redacted] and whether [redacted]
- 26 [redacted]
- 27 2. In the [redacted] section 1C, [redacted]
- 28 under Current Status, the response notes [redacted]
- 29 [redacted] has added additional measurements to this effect on the [redacted]
- 30 [redacted] in accuracy of processing tickets. This [redacted] rather than
- 31 answer seems to [redacted]
- 32 [redacted] Can you explain? Were measures [redacted] of [redacted]

- 33 [redacted]
- 34 1. The [redacted] page of this [redacted] stated that [redacted] but
- 35 [redacted] This seems to say [redacted] all
- 36 as of [redacted]
- 37 [redacted] made previously.
- 38 2. Based on the [redacted], does [redacted] believe [redacted] and [redacted]
- 39 [redacted] to the FPSC are [redacted] FPSC rules?

Interview Topics

- 2 **Wood Pole Inspections (DR 1.1-1.3)**
- 3 • Develop an understanding of the database that captures wood pole inspections results as
  - 4 well as the process flow
  - 5 • How are QA audits conducted and performed?
  - 6     o Determination of random sample to verify/validate vendor inspection results
  - 7 • Planning and tracking of wood pole inspections
  - 8     o Ranking of Wood Poles to be inspected annually
  - 9 • Process of rejection and replacement of poles
  - 10 • Understanding of verification of systems data accuracy in AMS/GIS with vendor work
  - 11 completed
  - 12 • Discussion of improvements as a result of [REDACTED] and [REDACTED]

- 13 **Initiative 1: Vegetation Management (DR 1.4-1.6)**
- 14 • Develop an understanding of the database that captures vegetation management results as
  - 15 well as the process flow
  - 16 • Planning and tracking of vegetation management (work planned vs. completed, budget
  - 17 vs. actual, and vendor billing vs. paid)
  - 18 • Process for auditing vegetation management work performed
  - 19 • Discussion of 100% feeder validation audits inspection and validation process
  - 20 • Random sample lateral validation audits selection criteria
  - 21 • Updating WMS to measure plan progress
  - 22 • Understanding of verification/validation of systems data accuracy
  - 23 • Discussion of improvements as a result of [REDACTED] and [REDACTED]

- 24 **Initiative 2: Joint-Use Pole Attachment Audits (DR 1.7-1.9)**
- 25 • Planning and determination of joint-use pole inspections
  - 26 • Develop an understanding of the database that captures joint-use pole attachment audit
  - 27 and load analysis results as well as the process flow
  - 28 • How are inspections of audits of joint-use attachment poles conducted?
  - 29 • Understand the process for reviewing attachment records
  - 30 • Determining pole strength and remaining strength and records process
  - 31 • How the 5 year cycle is tracked vs. completed inspections
  - 32 • Annual 20% audits/survey completion and recording
  - 33 • Pole replacements due to overloading and updating system data
  - 34 • Discussion of improvements as a result of [REDACTED] and [REDACTED]

- 35 **Initiative 3: Six-Year Transmission Structure Inspection Program (DR 1.10-1.12)**
- 36 • Planning and tracking of Transmission pole inspections
  - 37     o Ranking of Poles and Structures to be inspected annually
  - 38 • Process tracking and auditing transmission inspection results
  - 39 • Database and process flow
  - 40 • Determination of random sample to verify/validate vendor inspection results
  - 41 • Understanding of verification of systems data accuracy

- 1 **Initiative 4: Storm Hardening of Existing Transmission Structures (DR 1.13-1.15)**
- 2 • Develop an understanding of the database that captures storm hardening of transmission
- 3 results as well as the process flow
- 4 • Monthly tracking of progress for Transmission hardening activities in the AMP system
- 5 • Tracking of inspections and replacements completed.
- 6 • Understanding of verification/validation of systems data accuracy
- 7 **Initiative 5: GIS (DR 1.16-1.18)**
- 8 • Process flow for integrating facilities and assets into GIS
- 9 • Interactions between GIS and other applications (e.g. OMS, AMP, others)
- 10 • Data verification/validation for accuracy
- 11 • How GIS costs budgeted and tracked
- 12 **Initiative 6: Post-Storm Data Collection (DR 1.19-1.21)**
- 13 • Develop an understanding of the database that captures forensic analysis results as well
- 14 as the process flow
- 15 • Experience with Post-storm Data Collection in FPL's annual company-wide dry run
- 16 **Initiative 7: Overhead vs. Underground Reliability (DR 1.22)**
- 17 • Capture and use of overhead/underground reliability results
- 18 • Experience with Post-storm Data Collection in FPL's annual company-wide dry run
- 19 **Reliability Indices (DR 1.23-1.33)**
- 20 • Overview of organizational structure and responsibilities
- 21 • Discussion of the system chart provided in DR 1.25 and Data Warehouse input/output for
- 22 indices
- 23     o Process of capturing interruptions (i.e. Are all individual customers included?)
- 24     o TCMS validation process
- 25     o Feeder Lockdown instructions
- 26     o Ticket Coding and post-day ticket validation
- 27     o CEMI customer validation process
- 28 • Verification and reconciliation of data
- 29 • Walk-through of Outage Auditing process
- 30 • Walk-through of exclusions and determination of areas affected
- 31 • Benchmarking analyses for reliability indices ( [redacted] etc.)
- 32 • IEEE 1366
- 33 • Benefit of 2.5% and other internal and external indices for measuring reliability
- 34 performance
- 35 • Walk-through FPL's process to ensure that the Commission reliability indices are being
- 36 implemented as prescribed
- 37 • Discuss FPL's use of service reliability complaints to improve reliability performance

A B C D E F G H I J K L M N O P

**Bureau of Performance Analysis  
Interview Summary**

Company: Florida Power & Light Company Area: Electric Reliability Report Auditor(s): L. Fisher/G. Vinson	Interview Number: IVS-5 File Name:
Name: Severino Lopez, Regulatory & Distribution, Tony Maceo, Manager of Internal Audit	Date of Interview: 4/24/15 Location: Teleconference Telephone Number: FPL called into my office

1) Purpose of Interview: To understand [redacted] conducted for [redacted] during the period [redacted] to date.

(2) Interview Summary: [redacted] The [redacted] and [redacted] follow-up [redacted] of the [redacted] were

a. [redacted] due to the [redacted] of the [redacted] rather than [redacted] were identified [redacted] as they should; [redacted] are made to [redacted] controls, meaning that the [redacted]

b. [redacted] focused on [redacted] that did not [redacted] of [redacted] AMS as the [redacted] was the more correct [redacted]

c. [redacted] source: [redacted] unsure of the resolution for [redacted] however, remembers [redacted] but a management change [redacted] and [redacted] not yet provided [redacted] audit in [redacted]

d. [redacted] and [redacted] of the concerns [redacted] about a part of the company where the [redacted] and [redacted] was making [redacted]

e. [redacted] looked at what would be the incentive [redacted] all goals and incentives were [redacted] to move the needle on a [redacted] were being given to [redacted] the [redacted] came at a [redacted] were [redacted] and [redacted] to remove any potential [redacted] was measured more on [redacted] the changes expected [redacted] had been [redacted] and then [redacted]

f. [redacted] during the period of the [redacted] however, all changes [redacted] and [redacted] to the [redacted] asked whether, based on the [redacted] the [redacted]

g. [redacted] FPSC are accurate and in compliance with FPSC rules.

(3) Conclusions:

(4) Data Request(s) Generated:  
 No. \_\_\_\_\_  
 No. \_\_\_\_\_  
 No. \_\_\_\_\_

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(5) Follow-up Required:

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lateral lines experiencing more than 3 momentaries in a month; Area Managers receive daily outage recaps to FPL also has a 4+ Feeder program targeting the cause of feeders with more than 4 outages in a month; FPL noted that customer complaints have been useful in identifying system conditions that contribute to outages and momentaries; FPL has identified the CBMM measure to track customers with multiple momentaries as high as 50, due to low voltages and other causes; FPL noted that their effort to address CEMMSO was completed last year, and the next goal is to eliminate all CEMM35 events and further reduce customer momentaries; the benefit of AMI is to identify fault current and real-time information to determine the cause of the momentary; in the last few years the control center has had tools to find faults more quickly; Fault Current Identifiers (FCI) are part of the Smart Grid technology that is FPL's Energy Smart Florida;

g. FPL explained that the Data Warehouse is used to interface with FPL field systems which gather outage data used to calculate and report reliability metrics and data regarding the ten initiatives; the warehouse stores data that can be reviewed by company management and be used for further analysis and reporting to management;

h. The interviewees did not know who initially [redacted] and [redacted]

[redacted] of [redacted] due to limited impact on individual and group [redacted] from [redacted]

[redacted] the root causes were identified as process-related [redacted] to [redacted]

a small revision was reported to FPSC to ensure indices were reported correctly; a follow-up review of the [redacted] and found [redacted] was to follow-up the [redacted] a second [redacted] was completed on the [redacted]

[redacted] and found [redacted]

(3) Conclusions:  
  
(4) Date Request(s) Generated:  
No. \_\_\_\_\_  
No. \_\_\_\_\_  
No. \_\_\_\_\_

(5) Follow-up Required:  
1. Clarify reporting numbers for Distribution Operations Lead and General Manager organizations  
2. Review examples of Delivery Assurance monthly sampling reviews of ticket data  
3. Provide the monthly control center error rates for Feeder and Lateral tickets during 2014 and 2015 to date  
4. Provide a list of SLIDs of employees making errors for Feeder and Lateral tickets during 2014 and 2015 to date  
5. Provide a copy of current Ticket Validation Procedures (if not in DR-1 or DR-2)

Project Manager: \_\_\_\_\_

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1 technology consulting; all work is captured in the Work Management System (WMS); WMS allows contractors to input completed  
2 work directly through an interface; it also allows managers to track Work Requests (WRs), which include data regarding feeder  
3 number, type line, miles of line, start date and finish date, percent complete; QA survey results are also tracked in WMS; QA is  
4 completed by Environmental Construction Inc. (ECI) and ACRC arborists; if rework is needed the inspector writes up needed rework  
5 on the existing WR;

6 h. The Vegetation Management Plan is loaded annually and progress is tracked continually; the plan is developed based on the  
7 feeder/lateral trim list, feeder reliability, PSC cycle target (1/6 of system per year) and develops a weighted index that considers CI,  
8 GEML on each circuit; each circuit has a unique identifier as well; the Plan is built on a rolling three year basis, with targets developed  
9 monthly and quarterly; an automated controller interface takes work units and generates WMS Work Requests; FPL uses Asplundh  
10 and two other tree trim contractors to complete the work; Veg. Mgmt. is constantly balancing and prioritizing work to available  
11 contract labor resources; Vegetation Management also conducts interim cycle trimming through a separate mid-cycle plan; vendors  
12 are held to trim targets and QA inspections are completed by an independent contractor; QA is not a full time job for all areas; vendors  
13 input their vegetation trim work start date (form 599 start date), % complete, and complete dates (form 731 request inspection) to track  
14 and document whether work is completed on time; Billing is completed on a cost per mile rate for each contractor; any rework is free  
15 from the vendor; vendors are notified of rework conditions through WMS with an attached rework notice; FPL involves vendors  
16 monthly;

17 Overall results were  
18  
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20 VM-TVS is used for hot spot, T&M, customer trim request  
21 work and reliability work; if FPL cannot combine this work into regularly scheduled trim work they will "hot spot" trim to ensure fast  
22 growing trees are trimmed in their off cycle; some trees and shrubs are faster growing than others and must be trimmed between  
23 normal cycles to ensure reliability; this is when mid cycle and hot spot trimming are necessary; the WMS selects the 1% of GM jobs  
24 to be reviewed by QA;

25 Overall  
26 results were  
27

31 (3) Conclusions:

32 (4) Date Request(s) Generated:

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36 (5) Follow-up Required:

Project Manager

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### Bureau of Performance Analysis Interview Summary

Company: Florida Power & Light Company  
Appear Electric Reliability Report  
Auditor(s): L. Fisher/C. Vinson

Interview Number: IVS-1  
File Name:

Name: Dave Bromiley, Regulatory & Distribution, Tom Allain,  
Gen. Mgr. Central Maintenance, James Pike, Pole Inspection  
Lead, Eilson Tomayo, Pole Engineering, Scott Gordon, Gen.  
Counsel.

Date of Interview: 3/16/15  
Location: 7200 NW 4<sup>th</sup> St., Plantation, FL  
Telephone Number:

(1) Purpose of Interview: To understand the company's systems, processes and controls used to capture, analyze, and ensure the accuracy of reliability metrics reported to the EPSC

(2) Interview Summary:

a. Central Maintenance is responsible for construction work, OH/UG conversions, cable services, Distribution pole inspections, and other duties; James Pike is the Pole Inspection Lead, responsible for ensuring pole inspections are completed on cycle per the inspection program and reports to Tom Allain, Gen. Mgr.

b. FPL's vendor completes inspections and uses portable computer to capture results; The vendor results were stored in their Fastgate system until 2012, when the system was retired; currently the vendor provides pole inspection data through a direct feed to FPL IT. Vendor inspection data is reviewed by their supervisors, prior to sending data and invoices to FPL; Monthly a 500 pole sample of vendor inspection data is reviewed by FPL QA; this second review of inspection data by FPL QA inspectors, determines whether the work ordered is comparable to the work performed by the vendor, verifies whether vendor charges are reflective of the contractual agreement, and whether unnecessary work is completed, or rework is necessary; administrative checks against contract prices are also conducted on an ongoing basis; AMS/GIS is updated internally by FPL upon completion, inspection, review, and approval of work completed;

c. FPL Central Maintenance maintains updated inspection data in excel files; FPL Pole Inspection uses the raw data results from the vendor to update the Central Maintenance stored excel files and complete pole inspection reports; vendor raw data files are also uploaded via high density XML files to FPL Information Technology; pole data from the vendor is also loaded into the Asset Management System (AMS) to update pole records and other update purposes;

d. Pole inspection techniques include visual, sound, bore, and excavation to 18" deep for wood poles; The vendor also completes pole strength and load assessments to ensure poles do not violate NESC standards; Additionally, pole spans, equipment attachments, class of pole, and height of pole are reviewed; all poles inspected are treated around the base of the pole excavation;

e. FPL's Work Management System (WMS) tracks pole inspection work activity; weekly status of follow-up work and rework is monitored to ensure the activity is completed in a timely manner;

f. As a result of the first pole inspection cycle, FPL requested that the Commission modify requirements for CCA pole inspection excavations and load calculations because of the low failure rate for CCA poles; the Commission approved an extension of the inspection excavation period for new CCA poles from 16 years to 28 years, and load calculation for wood poles to greater than 80% before required inspection in the second inspection cycle. There are cost savings for 2<sup>nd</sup> cycle inspections due to the EPSC change;

g. An [redacted] identifier [redacted] the work was completed by the vendor;

[redacted] Central Maintenance worked Today; [redacted] Tom Allain

stated that the bottom line was the XML/Excel files are the document of record for pole inspections;

(3) Conclusions:

(4) Data Request(s) Generated:

(5) Follow-up Required:

1. Ask for the monthly reviews of the 500 sample pole inspections audited by QA inspectors.

2. Describe the changes made to FPL's AMS/GIS systems to ensure [redacted]

3. Provide a copy of the latest AMS/GIS reconciliation performed (through March 2015), showing the number of pole inspections performed.

4. Provide a copy of the latest AMS/GIS/Deployment Plan reconciliation performed (through March 2015), showing the number of pole inspections performed.

5. Provide a copy of the latest Central Maintenance stored excel files (through March 2015) showing the number of pole inspections performed.

Project Manager

# **EXHIBIT C**

## **JUSTIFICATION TABLE**



**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Workpapers  
**AUDIT:** Review of Data Accuracy in Electric Reliability Reporting by Florida Electric IOUs

Description	Page No.	Conf. Y/N	Line No. Col No.	Florida Statute 366.093(3) Subsection	Affiant
DR-2	44	Y	Lines 14, 15 Cols B, D, E Line 16 Cols B, C, D, F Line 17 Col C	(b)	David T. Bromley
DR-4	50	Y	Line 12 Cols B, D, G Line 13 Cols B, E, G	(b)	David T. Bromley
DR-4 Response	61	Y	Line 13 Cols B, D, G Line 14 Cols B, E, G	(b)	David T. Bromley
Document Summary and Control Log	67	Y	Line 24 Cols C, E	(b)	David T. Bromley
	68	Y	Line 32 Col D, E Line 33 Col B	(b)	
	79	Y	Line 7 Cols F, G, I Line 16 Cols C, E, F, H, I	(b) (e)	
	82	Y	Line 7 Col J Line 9 Cols C, E - G Line 10 Cols C, E - H Line 11 Cols C - E, G, H Line 12 Cols C - G	(b)(e)	
	91	Y	Line 8 Col C, E, H Line 9 Col C, F, H Lines 11 & 12 Col C - I	(b)	

Description	Page No.	Conf. Y/N	Line No. Col No.	Florida Statute 366.093(3) Subsection	Affiant
	98	Y	Line 2 Cols A - M Line 3 Cols B - D, G - I, K - O Line 5 Cols D, F, G, Q, R Line 6 Cols B, C Line 7 Cols D, E, I - K, O, P Line 8 Cols O, P Line 9 Cols D - F, I - P, R Line 10 Cols C - E, M, N, P, Q Line 11 Line 12 Cols J - P Line 13 Cols H - N, Q, R Line 14 Cols B - D Line 15 Cols L, M, P - R Line 16 Cols B, F - J Line 17 Cols A - m Line 18 Cols M - O, Q, R Line 19 Col C Line 20 Cols I - M Line 21 Cols F - J Line 22 Cols D - F Line 23 Cols B - I, K - Q Line 24 Line 25 Cols M - P, R Line 26 Cols B - F, L Line 28 Col Q Line 29 Cols C - P Line 30		
Questions	99	Y	Line 1 Cols B - D, G, H, J - L, Q - S Line 2 Cols A - C, E - Q Line 3 Cols J - N Line 4 Cols F - N Line 6 Cols D - K, M - O, S Line 7 Line 8 Cols E - G, L - N Line 9 Cols F - I Line 10 Cols E - R Line 11 Cols G - S Line 12 Cols A, B, G, K, O - R Line 13 Cols D - S Line 14 Cols A - D, S Line 15 Line 16 Cols F - P Line 17 Cols A - D, K - S Line 18 Cols B - K Line 19 Cols M, O - R Line 20 Cols D, E, H - N Line 21 Line 22 Cols O - S Line 23 Cols A - E, I - L, Q - S Line 24 Cols A - C, J - S Line 25 Cols F - J, N - S Line 26 Line 27 Cols C - E, I - S	(b)	David T. Bromley

Description	Page No.	Conf. Y/N	Line No. Col No.	Florida Statute 366.093(3) Subsection	Affiant
Questions (cont)	99 (cont)	Y (cont)	Line 28 Cols A - D, N - S Line 29 Cols A - H Line 30 Cols A - K Line 31 Cols E - P Line 32 Cols A - F, N, O, P, Q Line 33 Line 34 Cols B - E, I - K, N - R Line 35 Cols A - O Line 36 Cols D - R Line 37 Cols A - E Line 38 Cols D - G, J, M - O, Q - S Line 39 Cols A, B, G - L	(b) (cont)	David T. Bromley (cont)
Interview Topics	100	Y	Lines 12, 23, 34 Col B, D	(b)	David T. Bromley
	101	Y	Line 31 Col B	(e)	
Interview Summary	107	Y	Line 9 Cols E, F, I - L, O Line 11 Cols A - E, G, H, K, M - O Line 12 Cols B - G, O, P Line 13 Cols B, D - G, P Line 14 Cols A, B, D - J, N, O, P Line 15 Cols C, D, H - L, O, P Line 16 Line 17 Cols A - G, I - K, O, P Line 18 Cols B - G, I - O Line 19 Cols A - B, D, E, G, H - O Line 20 Cols B - G, J - N Line 22 Cols A - G, M, N Line 23 Cols B, C, G - L Line 24 Cols A - E, F - I, M, N, P Line 25 Cols B, C Line 26 Line 27 Cols A - F, K - P Line 28 Cols A - D, G, N - P Line 29 Cols E - P Line 30 Cols A - C, H - N Line 31 Cols A - D, F, I - M, P Line 32 Cols A, B, F - J, L - O, P Line 33 Cols A, C, G - K Line 34 Cols A - H, M, N, P Line 35 Cols A - D, G - I, N - P Line 36 Cols A, E - I, K, L, N, O Line 37 Cols G - I	(b)	David T. Bromley
	110	Y	Line 12 Cols B - F, L, M, O, P Line 13 Cols A, B, D - P Line 14 Cols A, B, I - O Line 15 Cols A, B, D - I, P Line 16 Cols A, O, P Line 17 Cols A - D, H - N Line 18 Cols A - I, K, L, P Line 19 Cols A - D, F - M		

Description	Page No.	Conf. Y/N	Line No. Col No.	Florida Statute 366.093(3) Subsection	Affiant
Interview Summary (cont)	112	Y	Line 17 Cols B – D, G - I Line 18 Line 19 Cols A – G, I, J Line 20 Line 21 Cols A - F Line 26 Cols A - I Line 27 Cols C - J Line 28 Cols A – E, G - J Line 29 Cols A, B, D - J Line 30	(b)	David T. Bromley
	113	Y	Line 37 Cols B, C, E - H Line 38 Cols A – D, G, H Line 39 Line 40 Cols A - F Line 41 Cols A – D, F, G Line 47 Cols F - H Line 48 Cols A, B		

**EXHIBIT D**

**AFFIDAVIT**

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of Data Accuracy in Electric Reliability Reporting by Florida IOUs

Docket No: 150000  
Date: July 23, 2015

STATE OF FLORIDA        )  
  )  
COUNTY OF BROWARD    )

**AFFIDAVIT OF DAVID T. BROMLEY**

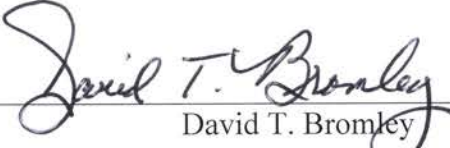
**BEFORE ME**, the undersigned authority, personally appeared David T. Bromley who, being first duly sworn, deposes and says:

1. My name is David T. Bromley. I am currently employed by Florida Power & Light Company ("FPL") as Manager, Regulatory Services. My business address is 7200 N.W. 4<sup>th</sup> Street, Plantation, Florida 33317. I have personal knowledge of the matters stated in this affidavit.

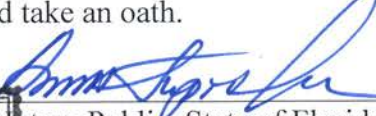
2. With respect to Exhibit C, I have reviewed the documents and information for which I am listed as Affiant and which are included in Exhibit A to FPL's Request for Confidential Classification regarding certain audit work papers associated with Staff's audit report entitled Review of Data Accuracy in Electric Reliability Reporting by Florida Electric IOUs. Documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute internal auditing controls and reports of internal auditors. In addition, the documents or materials contain information concerning contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. Specifically, the information contains references to benchmarking analyses which FPL is required to maintain as confidential by contractual agreement. This information also relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

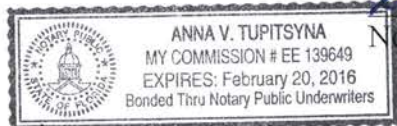
3. This information should be maintained as confidential for a period of not less than eighteen months. In addition, these materials should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.

  
\_\_\_\_\_  
David T. Bromley

**SWORN TO AND SUBSCRIBED** before me this 23<sup>rd</sup> day of July 2015, by David T. Bromley, who is personally known to me and who did take an oath.

  
\_\_\_\_\_  
Notary Public, State of Florida



My Commission Expires: