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August 2, 2013

VIA HAND DELIVERY

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

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COMMISSION
CLERK

Re: Docket No. 130001-EI

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") are an original and seven (7) copies of FPL's Request for Confidential Classification of Certain Information on FPL's 2014 Risk Management Plan (Exhibit GJY-2). The original includes Exhibits A through D. The seven copies do not include copies of the exhibits.

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Exhibit A contains the confidential information that is the subject of FPL's Request for Confidential Classification. Exhibit A is submitted for filing separately and marked "**EXHIBIT A**" - **CONFIDENTIAL**. 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 Request for Confidential Classification. Exhibit D contains the Affidavit of Gerard Yupp in support of FPL's Request for Confidential Classification. In accordance with Rule 25-22.006(3)(d), FPL requests confidential treatment of the information in EXHIBIT A pending disposition of FPL's request for Confidential Classification.

Also included herewith is a disc containing FPL's Request for Confidential Classification and Exhibit C.

Please contact me should you or your Staff have any questions regarding this filing.

Sincerely,

Maria J. Moncada

Enclosures
cc: parties of record, w/o exhibits

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchase Power Cost
Recovery Clause with Generating Performance
Incentive Factor

Docket No: 130001-EI

Filed: August 2, 2013

**FLORIDA POWER AND LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
CERTAIN INFORMATION ON FPL'S 2014 RISK MANAGEMENT PLAN**

Pursuant to Section 366.093, Florida Statutes (2011), and Rule 25-22.006, Florida Administrative Code (2011), Florida Power & Light Company ("FPL") requests confidential classification of certain information (the "Confidential Information") contained in FPL's 2014 Risk Management Plan ("Hedging Plan"), which is Appendix III to the 2013 estimated/actual true-up petition that is being filed in this docket on August 2, 2013. In support of its Request, FPL states as follows:

1. FPL is filing its 2014 Risk Management Plan, Appendix III to the 2013 estimated/actual true-up petition contemporaneously with this request.
2. The following exhibits are included with and made a part of this request:
 - a. Composite Exhibit A consists of a copy of the Hedging Plan in which all the Confidential Information has been highlighted.
 - b. Composite Exhibit B consists of the Hedging Plan in which all the Confidential Information has been redacted. For the attachments in the Hedging Plan in which the entire attachment is confidential, FPL has included only identifying cover pages.
 - c. Exhibit C is a table that identifies the specific line and page references to the confidential information for which FPL seeks confidential treatment. The table also

references the specific statutory basis for confidentiality and identifies the affiant who supports the requested classification.

d. Exhibit D consists of the affidavit of Gerard J. Yupp.

3. 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.

4. As the affidavit in Exhibit D indicates, certain documents provided by FPL contain information related to the Hedging Plan which comprise of details of FPL's strategy and plans for hedging fuel purchases in 2014 and beyond. This information constitutes trade secrets of FPL, which allow FPL to hedge its fuel purchases on favorable terms for FPL and its customers. The disclosure of this trade-secret information would provide other market participants insight into FPL's marketing and trading practices as well as internal policy and procedures, which would allow them to anticipate FPL's marketing and trading decisions and/or impair FPL's ability to negotiate, to the detriment of FPL and its customers. This information is protected by Section 366.093(3)(a), Fl. Stat.

5. Additionally, the Confidential Information contained in the Hedging Plan includes information that relates to hedging-related bids or other contractual data, the disclosure of which would impair the efforts of FPL to hedge on favorable terms, to the detriment of FPL and its customers. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Finally, the Confidential Information also relates to competitive interests, and its disclosure would impair the competitive business of FPL. This information is protected by Section 366.093(3)(e), Fla. Stat.

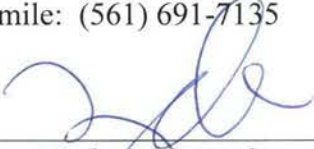
7. Upon a finding by the Commission that the Confidential Information highlighted in Exhibit A and referenced in Exhibit C is proprietary confidential business information, the information should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* §366.093(4), Fla. Stat. (2011).

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

Respectfully submitted,

R. Wade Litchfield, Esq.
Vice President and General Counsel
John T. Butler, Esq.
Assistant General Counsel – Regulatory
Maria J. Moncada
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5639
Facsimile: (561) 691-7135

By: _____


Maria J. Moncada
Fla. Bar No. 0773301

CERTIFICATE OF SERVICE

Docket No. 130001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification (*) has been furnished by hand delivery (**) or United States Mail this 2nd day of August 2013, to the following:

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

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Division of Economic Regulation
Florida Public Service Commission
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118 N. Gadsden St.
Tallahassee, FL 32301
Counsel for FIPUG

By: _____


Maria J. Moncada

*Exhibits to this Request are not included with the service copies, but a redacted version of Exhibit B is included with the testimony of Mr. Keith that is being served on all parties, and copies of Exhibits C and D are available upon request.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

FPL traders generally execute trades with counterparties offering the best price for a given instrument. However, in a case where two or more counterparties are offering similar pricing, the traders will attempt to execute trades with the counterparty that has the least amount of credit exposure with FPL. This is done primarily to allow FPL to spread its risk among as many counterparties as possible, but also affords the advantage of preventing the inadvertent telegraphing of FPL's commercial intentions to the market, thus helping to ensure favorable pricing for FPL's hedges.

2014 Hedging Strategy (TFB-4, Items 2 and 8)

FPL plans to hedge a portion of its projected 2015 natural gas requirements during 2014. Absent special circumstances (e.g. a hurricane that FPL concludes will substantially impair market functions); FPL will implement its hedging program within the following parameters:

Natural Gas

- 1) FPL will hedge approximately ^A [redacted] of its projected 2015 natural gas requirements within the Hedging Window during 2014. This hedge percentage is consistent with 2014 hedge levels and is within FPL's system base load requirements. FPL will hedge approximately ^B [redacted] of each individual month's projected natural gas requirements.
- 2) FPL will utilize ^C [redacted] to hedge its projected natural gas requirements.
- 3) FPL will execute its ^E natural gas hedges for 2015 from ^D [redacted] through ^E [redacted] as shown below:

Hedging Window

During each month of the Hedging Window, FPL will hedge the percentages shown of its projected 2015 natural gas requirements. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.

- 4) FPL intends to rebalance its natural gas hedge positions during the year based on changes in forecasted market prices, projected unit outage schedules or changes in FPL's load forecast. Once the initial monthly target volumes have been hedged, rebalancing will be executed to maintain the hedge percentages inside approved tolerance bands. The monthly tolerance bands for natural gas are ^F [redacted]. Therefore, the minimum and maximum monthly hedge percentages are ^G [redacted] and ^H [redacted] respectively.

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 60]

Trading and Risk Management Procedures Manual

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 26]

Energy Trading and Risk Management Policy

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 1 through 5]

Planned Position Strategy

FPL traders generally execute trades with counterparties offering the best price for a given instrument. However, in a case where two or more counterparties are offering similar pricing, the traders will attempt to execute trades with the counterparty that has the least amount of credit exposure with FPL. This is done primarily to allow FPL to spread its risk among as many counterparties as possible, but also affords the advantage of preventing the inadvertent telegraphing of FPL's commercial intentions to the market, thus helping to ensure favorable pricing for FPL's hedges.

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FPL plans to hedge a portion of its projected 2015 natural gas requirements during 2014. Absent special circumstances (e.g. a hurricane that FPL concludes will substantially impair market functions); FPL will implement its hedging program within the following parameters:

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- 1) FPL will hedge approximately ^A [redacted] of its projected 2015 natural gas requirements within the Hedging Window during 2014. This hedge percentage is consistent with 2014 hedge levels and is within FPL's system base load requirements. FPL will hedge approximately ^B [redacted] of each individual month's projected natural gas requirements.
- 2) FPL will utilize ^C [redacted] to hedge its projected natural gas requirements.
- 3) FPL will execute its ^E natural gas hedges for 2015 from ^D [redacted] through ^E [redacted] as shown below:

Hedging Window

[Redacted Hedging Window Table]

- During each month of the Hedging Window, FPL will hedge the percentages shown of its projected 2015 natural gas requirements. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.
- 4) FPL intends to rebalance its natural gas hedge positions during the year based on changes in forecasted market prices, projected unit outage schedules or changes in FPL's load forecast. Once the initial monthly target volumes have been hedged, rebalancing will be executed to maintain the hedge percentages inside approved tolerance bands. The monthly tolerance bands for natural gas are ^F [redacted]. Therefore, the minimum and maximum monthly hedge percentages are ^G [redacted] and ^H [redacted] respectively.

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 60]

Trading and Risk Management Procedures Manual

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 26]

Energy Trading and Risk Management Policy

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 1 through 5]

Planned Position Strategy

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Exhibits
DOCKET NO.: 130001-EI
DOCKET TITLE: Levelized Fuel Cost Recovery and Capacity Cost Recovery
SUBJECT: FPL's 2014 Risk Management Plan
DATE: August 2, 2013

Description	Page No.	Conf. Y/N	Line Nos.	Florida Statute 366.093(3) Subsection	Affiant
FPL 2014 Risk Management Plan	5	Y	Lines 1A, 4B, 6C, 8D, 9E, 11, 12, 22F, 23G, 23H	(a), (d), (e)	G. Yupp
Trading and Risk Management Procedures Manual	2 through 60	Y	All	(a), (d), (e)	G. Yupp
Energy Trading and Risk Management Policy	2 through 26	Y	All	(a), (d), (e)	G. Yupp
Planned Position Strategy	1 through 5	Y	All	(a), (d), (e)	G. Yupp

EXHIBIT D

AFFIDAVIT

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Fuel and Purchased Power Cost Recovery
Clause with Generating Performance
Incentive Factor

Docket No. 130001-EI
Dated: August 2, 2013

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT OF GERARD J. YUPP


BEFORE ME, the undersigned authority, personally appeared Gerard J. Yupp who, being first duly sworn, deposes and says:

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading Division. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification of its 2014 Risk Management Plan. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information are comprised of the details of FPL's strategy and plans for hedging fuel purchases in 2014 and beyond. This information constitutes trade secrets of FPL, which allow FPL to hedge its fuel purchases on favorable terms for FPL and its customers. The disclosure of this trade-secret information would provide other market participants insight into FPL's marketing and trading practices as well as internal policies and procedures, which would allow them to anticipate FPL's marketing and trading decisions and/or impair FPL's ability to negotiate, to the detriment of FPL and its customers. Additionally, the confidential information contained in the 2014 Risk Management Plan relates to competitive interests and hedging-related bids or other contractual data, the disclosure of which would impair the competitive business as well as the efforts of FPL to contract for goods and services on 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 eighteen (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.


Gerard J. Yupp

SWORN TO AND SUBSCRIBED before me this 31st day of July 2013, by Gerard J. Yupp, who is personally known to me or who has produced _____ (type of identification) as identification and who did take an oath.


Notary Public, State of Florida

My Commission Expires:

