



Scott A. Goorland
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
561-304-5633
(561) 691-7135 (Facsimile)
E-mail: scott.goorland@fpl.com

September 11, 2014

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

RECEIVED FPSC
14 SEP 11 PM 1:57
COMMISSION
CLERK

Re: Docket No. 140001-EI

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") Request for Confidential Classification of Certain Material Provided in Response to OPC's Third Set of Interrogatories (Nos. 18-59) and Fourth Production of Documents Request Nos. 5-28). The original includes Exhibits A, B (two copies), C and 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 Request for Confidential Classification. Exhibit D contains three affidavits in support of FPL's Request for Confidential Classification. Also included in this filing is a compact disc containing FPL's Request for Confidential Classification and Exhibit C, in Microsoft Word format.

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

Sincerely,

Scott A. Goorland

Enclosure

cc: Counsel for Parties of Record (w/o encl.)

Florida Power & Light Company

700 Universe Boulevard, Juno Beach, FL 33408

1504029

COM
AFD
APA
ECO
ENG
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IDM
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2 + Redacted & B
and CD

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Prudence Determination
Regarding Acquisition of Gas Reserves

Docket No: 140001-EI
Date: September 11, 2014

**FLORIDA POWER AND LIGHT COMPANY'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF CERTAIN MATERIAL PROVIDED
IN RESPONSE TO OPC'S THIRD SET OF INTERROGATORIES (NOS. 18-59) AND
FOURTH PRODUCTION OF DOCUMENTS REQUEST (NOS. 5-28) TO
FLORIDA POWER & LIGHT COMPANY**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") submits its Request for Confidential Classification of certain material provided in response to Office of Public Counsel's ("OPC's") Third Set of Interrogatories to Florida Power & Light Company (Nos. 18-59), Nos. 27, 33, 36, 37, 45 and 46 as well as OPC's Fourth Request for Production of Documents to Florida Power & Light Company (Nos. 5-28), Nos. 9, 10, 11 and 12. In support of its request, FPL states as follows:

1. On July 31, 2014, OPC served its Third Set of Interrogatories (Nos. 18-59), and OPC's Fourth Production of Documents (Nos. 5-28) on FPL. On August 21, 2014, FPL served its responses to OPC's Third Set of Interrogatories (Nos. 18-59), and OPC's Fourth Production of Documents Request (Nos. 5-28). FPL provided a copy of its responses to Staff of the Florida Public Service Commission ("Staff"). Portions of FPL's responses contain information of a confidential nature, which is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. On August 21, 2014, FPL filed a Notice of Intent to Request Confidential Classification of its responses to OPC's Third Set of Interrogatories (Nos. 18-59), and OPC's Fourth Production of Documents Request (Nos. 5-28). Pursuant to Rule 25-22.006(3)(a),

Florida Administrative Code, FPL has 21 days from the date of the Notice of Intent to file a formal request for confidential classification. Accordingly, FPL is filing this Request for Confidential Classification to maintain continued confidential handling of the information contained in the discovery responses provided to Staff with the Notice of Intent.

2. The following exhibits are included with, and made part of this request:
 - a. Exhibit A consists of a copy of the confidential material on which all information that FPL asserts is entitled to confidential treatment has been highlighted.
 - b. Exhibit B consists of the confidential material, on which all information that FPL asserts is entitled to confidential treatment has been redacted.
 - c. Exhibit C is a table containing a column-by-column and line-by-line identification of the information for which confidential treatment is sought and references to the specific statutory basis or bases for the claim of confidentiality and to the affidavits in support of the requested classification.
 - d. Exhibit D consists of the affidavits of Sam Forrest, Melissa Linton and Timothy Taylor, PhD.

3. FPL submits that the highlighted information in Exhibit A is proprietary and confidential business information within the meaning of Section 366.093(3). F.S. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, F.S., 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 affidavits included in Exhibit D indicate, the documents and materials included in Exhibits A and B, and identified in Exhibit C contain information concerning bids or other contractual data. Disclosure of this information would violate nondisclosure provisions of FPL's contracts with certain vendors and impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. Such information is protected pursuant to Section 366.093(3)(d), F.S. In addition, this information relates to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding gas volumes and gas burn rates as well as gas reserve estimates, projected economics and other terms. The disclosure of this proprietary confidential business information would provide other participants in the fuel and financial markets insight into FPL's hedging practices that would allow them to anticipate FPL's trading decisions and impair FPL's ability to negotiate, to the detriment of FPL and its customers. Disclosure of this information would also place FPL at a competitive disadvantage when coupled with other information that is publicly available. Such information is protected pursuant to Section 366.093(3)(e), F.S.


5. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibits B, C and D 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 it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

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

Respectfully submitted this 11th day of September, 2014.

R. Wade Litchfield, Vice President
and General Counsel
John T. Butler, Assistant General Counsel -
Regulatory
Scott A. Goorland, Principal Attorney
Attorneys for Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
Telephone: (561) 691-7101
Facsimile: (561) 691-7135

By: _____


Scott A. Goorland
Florida Bar No. 0066834

CERTIFICATE OF SERVICE
Docket No. 140001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery (**) or electronic service on this 11th day of September, 2014 to the following:

Martha F. Barrera, Esq.**
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
mbarrera@psc.state.fl.us
jgilcher@psc.state.fl.us

Jon C. Moyle, Esq.
Moyle Law Firm, P.A.
Attorneys for FIPUG
118 N. Gadsden St.
Tallahassee, Florida 32301
jmoyle@moylelaw.com

Beth Keating, Esq.
Gunster Law Firm
Attorneys for FPUC
215 South Monroe St., Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com

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Attorneys for DEF
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St. Petersburg, Florida 33701
john.burnett@duke-energy.com
dianne.triplett@duke-energy.com

James D. Beasley, Esq.
J. Jeffrey Wahlen, Esq.
Ashley M. Daniels, Esq.
Ausley & McMullen
Attorneys for Tampa Electric
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jwahlen@ausley.com
adaniels@ausley.com

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Russell A. Badders, Esq.
Steven R. Griffin, Esq.
Begg & Lane
Attorneys for Gulf Power
P.O. Box 12950
Pensacola, Florida 32591-2950
jas@beggslane.com
rab@beggslane.com
srg@beggslane.com

Robert Scheffel Wright, Esq.
John T. LaVia, III, Esq.
Gardner, Bist, Wiener, et al
Attorneys for Florida Retail Federation
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

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F. Alvin Taylor, Esq.
Attorney for White Springs
Brickfield, Burchette, Ritts & Stone, P.C
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Eighth Floor, West Tower
Washington, DC 20007-5201
jbrew@bbrslaw.com
ataylor@bbrslaw.com

J. R. Kelly, Esq.
Patricia Christensen, Esq.
Charles Rehwinkel, Esq.
Joseph A. McGlothlin, Esq.
Erik L. Saylor, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
mcglothlin.joseph@leg.state.fl.us
saylor.erik@leg.state.fl.us

Michael Barrett
Division of Economic Regulation
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
mbarrett@psc.state.fl.us

By: 
Scott A. Goorland
Florida Bar No. 0066834

EXHIBIT B

CONFIDENTIAL

CONFIDENTIAL

A B C D E

FORREST A. GARB & ASSOCIATES, INC.

INTERNATIONAL PETROLEUM CONSULTANTS
5310 HARVEST HILL ROAD, SUITE 275 - LB 152
DALLAS, TEXAS 75230 - 5805
(972)788-1110 Telefax (972)991-3160 (E MAIL) forgarb@forgarb.com

June 6, 2014

Mr. Sam Forrest
Vice President, Energy Marketing and Trading
Florida Power & Light Company
700 Universe Blvd.
EMT/JB
Juno Beach, FL 33418

**Subject: Consulting Services Agreement – Oklahoma Woodford Project
Reserves, Future Net Revenue, and Fair Market Value**

Dear Mr. Forrest:

This letter is a proposal by Forrest A. Garb & Associates, Inc. (FGA) to Florida Power & Light Company (FPL) to provide independent professional services in connection with a reserve study for a Woodford dry gas project located in Oklahoma.

Project scope of work for an evaluation of the properties in the Oklahoma Woodford Project includes:

1. Analyze analogous Woodford producing wells to determine applicable type curves.
2. Review back-up data which consists of geologic maps, future capital expenditures, and operating expenses.
3. Edit the PHDWin database provided by NextEra to use FGA's determined type curves.
4. Review the development schedule timing.
5. Make preliminary economic runs for FPL's review and approval using a 10% per year discount factor and the FPL Medium price deck provided by NextEra.
6. Prepare a formal reserve report as of July 1, 2014.
7. Provide hardcopy and PDF copies of the report as directed by FPL.

Our estimate of the total cost to perform the work necessary to complete this project includes approximately 40 hours of a senior engineer's time at [REDACTED] per hour, five (5) hours of an engineering technician's time at [REDACTED] per hour, and any costs associated with printing and/or shipping. An estimate of total cost is approximately [REDACTED]. This is not a turnkey price so the actual cost may be lower or in the event of unexpected additional work or increase in scope, the cost may be higher, in which case FGA will notify FPL at least three (3) business days in advance of

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FORREST A. GARB & ASSOCIATES, INC.

INTERNATIONAL PETROLEUM CONSULTANTS
5310 HARVEST HILL ROAD, SUITE 275 - LB 152
DALLAS, TEXAS 75230 - 5805
(972)788-1110 Telefax (972)991-3160 (EMAIL) forgarb@forgarb.com

Billing Rates

7 **Geologic and Engineering Studies:**

8	<u>POSITION</u>	<u>\$/HOUR</u>
9	Mr. Forrest A. Garb	█
10	Mr. Forrest A. Garb (deposition or testimony)	█
11	Engineering Advisor	█
12	Engineering Advisor (deposition or testimony)	█
13	Senior Engineer or Geologist	█
14	Senior Engineer or Geologist (deposition or testimony)	█
15	Engineer or Geologist	█
16	Technical Assistant	█
17	Clerical, Secretarial, Data Entry	█

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NOTE:

- Payment is due on receipt of invoice.
- FGA only bills for actual hours applied to an assignment.
- Hourly rates can vary with the individual's education, experience and capabilities.
- Rates are subject to periodic revision.
- With the exception of numerical simulation and selected computer modeling software, the above rates include complete computer hardware and software support.
- Rates for special programming or computer modeling will depend on the task.

CONFIDENTIAL

A

B

1 BANK TRANSFER INFORMATION
2 FORREST A. GARB & ASSOCIATES, INC.
3 VIEWPOINT BANK
4 ROUTING NO: [REDACTED]
5 ACCOUNT NO: [REDACTED]

6 ViewPoint Bank
7 2218 North Jupiter Road
8 Garland, TX 75044
9 972-578-5000

**Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Attachment I / Request No. 10**

Documents responsive to OPC's Fourth Request for Production of Documents No. 10 (Bates No. FCR-14-00706 through FCR-14-00709) are confidential in their entirety.

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A B

Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Request No. 10

1 E-mail: swwall@forgarb.com



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7
From: Lloyd, Lacy [<mailto:Lacy.Lloyd@nexteraenergy.com>]
Sent: Wednesday, June 11, 2014 10:18 AM
To: Sandra Wall
Cc: Taylor, Tim
Subject: PDP Database

8 Sandra,

9
10 Attached is the PHDWin database containing only the 17 PDP's within the AOI that NEE owns,
11 modeled at [REDACTED] of the JV WI. Four of the PDPs had incorrect ownership (Cable wells, Thelma,
12 Kemp), so I am updating the PUD/PROB database and will send that to you shortly. Only 4 PUDs and
4 PROBS will be affected.

13 Thank you,
14 Lacy

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Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Request No. 10

A B C

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Office: (972) 788-1110
Fax: (972) 991-3160
Website: www.forgarb.com
E-mail: swwall@forgarb.com
<image001.png>

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From: Taylor, Tim [<mailto:Tim.Taylor@nexteraenergy.com>]
Sent: Thursday, June 12, 2014 9:39 AM
To: Sandra Wall
Subject: RE: Report

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Sandra,
I just made the calculation. It is [redacted] of capex to drilling,
[redacted] to completions.
Tim

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From: Sandra Wall [<mailto:SWWall@forgarb.com>]
Sent: Thursday, June 12, 2014 9:18 AM
To: Taylor, Tim
Subject: RE: Report

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Tim:

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Do you want the increase [redacted] added to the drilling costs or completion costs?

21
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Thanks,
Sandra

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Sandra W. Wall, P.E.
Sr. Vice President
Petroleum Engineering

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FORREST A. GARB & ASSOCIATES, INC.
International Petroleum Consultants
5310 Harvest Hill Rd., Suite 275, LB 152
Dallas, TX 75230

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Office: (972) 788-1110
Fax: (972) 991-3160
Website: www.forgarb.com
E-mail: swwall@forgarb.com
<image001.png>

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36

From: Taylor, Tim [<mailto:Tim.Taylor@nexteraenergy.com>]
Sent: Thursday, June 12, 2014 9:00 AM

CONFIDENTIAL

Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Request No. 10

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To: Sandra Wall
Subject: Report

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Sandra,
Could you run a case (PUDs and PRBs only) using a [REDACTED]
[REDACTED] capex instead of [REDACTED] capex? Not sure yet, but
it looks like we may need that case. I'll let you know later
for sure what to put in your report.

Thanks,
Tim

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<Woodford Preliminary One-Liners 6-12-14.pdf>
<CapEx Inc 6-12-14 - PQ NEE Woodford Dry Carry
WI and CAPEX - Updated Ownership.xlsx>
<Woodford Prelim Eco Summary - Detail NGL 6-12-14.pdf>

A B C

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Petroleum Engineering

FORREST A. GARB & ASSOCIATES, INC.
International Petroleum Consultants
5310 Harvest Hill Rd., Suite 275, LB 152
Dallas, TX 75230

Office: (972) 788-1110
Fax: (972) 991-3160
Website: www.forgarb.com
E-mail: swwall@forgarb.com
<image001.png>

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Sent: Thursday, June 12, 2014 9:39 AM
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Sandra,
I just made the calculation. It is [redacted] of capex to drilling,
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Tim

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Sent: Thursday, June 12, 2014 9:18 AM
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Subject: RE: Report

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Tim:

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Sandra W. Wall, P.E.
Sr. Vice President
Petroleum Engineering

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Website: www.forgarb.com

A B C

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E-mail: swwall@forgarb.com
<image001.png>

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To: Sandra Wall
Subject: Report

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Thanks,
Tim

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<CapEx Inc 6-12-14 - PQ NEE Woodford Dry Carry
WI and CAPEX - Updated Ownership.xlsx>
<Woodford Prelim Eco Summary - Detail NGL 6-12-14.pdf>

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Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Request No. 10

A B C D E

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To: Sandra Wall
Subject: RE: Report

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Sandra,
I just made the calculation. It is [REDACTED] of capex to drilling, [REDACTED] to completions.
Tim

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From: Sandra Wall [<mailto:SWWall@forgarb.com>]
Sent: Thursday, June 12, 2014 9:18 AM
To: Taylor, Tim
Subject: RE: Report

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Tim:

11
Do you want the increase [REDACTED] added to the drilling costs or completion costs?

12
13
Thanks,
Sandra

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Sandra W. Wall, P.E.

15
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Sr. Vice President
Petroleum Engineering

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FORREST A. GARB & ASSOCIATES, INC.
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Office: (972) 788-1110
Fax: (972) 991-3160
Website: www.forgarb.com
E-mail: swwall@forgarb.com
<image001.png>

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From: Taylor, Tim [<mailto:Tim.Taylor@nexteraenergy.com>]
Sent: Thursday, June 12, 2014 9:00 AM
To: Sandra Wall
Subject: Report

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Sandra,
Could you run a case (PUDs and PRBs only) using a [REDACTED] capex instead of [REDACTED]
[REDACTED] capex? Not sure yet, but it looks like we may need that case. I'll let you know
later for sure what to put in your report.

34
35
Thanks,
Tim

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<Woodford Preliminary One-Liners 6-12-14.pdf>

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Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Request No. 10

A B

C

D

1 Sandra
2 I'm traveling. Could you send me a cash flow summary (detail NGL report format?) ?
3 Tim

4 Tim D. Taylor

5 On Jun 12, 2014, at 10:46 AM, "Sandra Wall" <SWWall@forgarb.com> wrote:

6 Tim:

7 Attached are preliminary one-liners with updated CapEx. I updated
8 Lucy's Interest/CapEx spreadsheet for you also.

9 Let me know how you want to proceed.

10 Thanks,
11 Sandra

12 *Sandra W. Wall, P.E.*

13 Sr. Vice President
14 Petroleum Engineering

15 **FORREST A. GARB & ASSOCIATES, INC.**
16 **International Petroleum Consultants**
17 5310 Harvest Hill Rd., Suite 275, LB 152
18 Dallas, TX 75230

19 Office: (972) 788-1110
20 Fax: (972) 991-3160
21 Website: www.forgarb.com
22 E-mail: swwall@forgarb.com
23 <image001.png>

24 **From:** Taylor, Tim [<mailto:Tim.Taylor@nexteraenergy.com>]
25 **Sent:** Thursday, June 12, 2014 9:39 AM
26 **To:** Sandra Wall
27 **Subject:** RE: Report

28 Sandra,
29 I just made the calculation. It is [redacted] of capex to drilling, [redacted] to
30 completions.
31 Tim

32 **From:** Sandra Wall [<mailto:SWWall@forgarb.com>]
33 **Sent:** Thursday, June 12, 2014 9:18 AM
34 **To:** Taylor, Tim

FCR-14-00728

CONFIDENTIAL

Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Request No. 10

A B C D

1 **Subject:** RE: Report

2 Tim:

3 Do you want the increase [REDACTED] added to the drilling costs or
4 completion costs?

5 Thanks,
6 Sandra

7 *Sandra W. Wall, P.E.*

8 Sr. Vice President
9 Petroleum Engineering

10 **FORREST A. GARB & ASSOCIATES, INC.**
11 International Petroleum Consultants
12 5310 Harvest Hill Rd., Suite 275, LB 152
13 Dallas, TX 75230

14 Office: (972) 788-1110
15 Fax: (972) 991-3160
16 Website: www.forgarb.com
17 E-mail: swall@forgarb.com
18 <image001.png>

19 **From:** Taylor, Tim [<mailto:Tim.Taylor@nexteraenergy.com>]
20 **Sent:** Thursday, June 12, 2014 9:00 AM
21 **To:** Sandra Wall
22 **Subject:** Report

23 Sandra,
24 Could you run a case (PUDs and PRBs only) using a [REDACTED] capex
25 instead of [REDACTED] capex? Not sure yet, but it looks like we may need
26 that case. I'll let you know later for sure what to put in your report.

27 Thanks,
28 Tim

29 <Woodford Preliminary One-Liners 6-12-14.pdf>

30 <CapEx Inc 6-12-14 - PQ NEE Woodford Dry Carry WI and
31 CAPEX - Updated Ownership.xlsx>

32 <Woodford Prelim Eco Summary - Detail NGL 6-12-14.pdf>

CONFIDENTIAL

Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Request No. 10

A

B C

D

1 **From:** Taylor, Tim
2 **Sent:** Thursday, June 12, 2014 9:39 AM
3 **To:** 'Sandra Wall'
4 **Subject:** RE: Report

5 Sandra,
6 I just made the calculation. It is [REDACTED] of capex to drilling, [REDACTED] to completions.
7 Tim

8 **From:** Sandra Wall [<mailto:SWWall@forgarb.com>]
9 **Sent:** Thursday, June 12, 2014 9:18 AM
10 **To:** Taylor, Tim
11 **Subject:** RE: Report

12 Tim:

13 Do you want the increase [REDACTED] added to the drilling costs or completion costs?

14 Thanks,
15 Sandra

16 *Sandra W. Wall, P.E.*

17 Sr. Vice President
18 Petroleum Engineering

19 **FORREST A. GARB & ASSOCIATES, INC.**
20 **International Petroleum Consultants**
21 5310 Harvest Hill Rd., Suite 275, LB 152
22 Dallas, TX 75230

23 Office: (972) 788-1110
24 Fax: (972) 991-3160
25 Website: www.forgarb.com
26 E-mail: swwall@forgarb.com

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CONFIDENTIAL

Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Request No. 10

A

B

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1
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From: Taylor, Tim [<mailto:Tim.Taylor@nexteraenergy.com>]
Sent: Thursday, June 12, 2014 9:00 AM
To: Sandra Wall
Subject: Report

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Sandra,
Could you run a case (PUDs and PRBs only) using a [REDACTED] capex instead of [REDACTED] capex?
Not sure yet, but it looks like we may need that case. I'll let you know later for sure what to put in
your report.
Thanks,
Tim

A B C D E

1 **From:** Taylor, Tim
2 **Sent:** Tuesday, June 17, 2014 12:00 PM
3 **To:** Sandra Wall
4 **Cc:** Lloyd, Lacy; Pitlik, Brittany
5 **Subject:** Re: Updated Woodford Scenario

6 Sandra
7 FPL will pay [redacted] of the 100% to earn [redacted] WI. PQ will own the other [redacted] and continue as operator.

8 Tim D. Taylor

9 On Jun 17, 2014, at 11:49 AM, "Sandra Wall" <SWWall@forgarb.com> wrote:

10 Just wondering:

11 If all other parties go non-consent, will FPL/NextEra pay 100% of CapEx or just the
12 [redacted] carry?

13 Thanks,

14 *Sandra W. Wall, P.E.*

15 Sr. Vice President
16 Petroleum Engineering

17 **FORREST A. GARB & ASSOCIATES, INC.**
18 **International Petroleum Consultants**
19 5310 Harvest Hill Rd., Suite 275, LB 152
20 Dallas, TX 75230

21 Office: (972) 788-1110
22 Fax: (972) 991-3160
23 Website: www.forgarb.com
24 E-mail: swwall@forgarb.com
25 <image002.png>

26 **From:** Lloyd, Lacy [<mailto:Lacy.Lloyd@nexteraenergy.com>]
27 **Sent:** Monday, June 16, 2014 4:41 PM
28 **To:** Sandra Wall
29 **Cc:** Taylor, Tim; Pitlik, Brittany
30 **Subject:** Updated Woodford Scenario

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Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Request No. 10

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Sandra,

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Please give me a call tomorrow morning to discuss the attached spreadsheet. We would like to run one more scenario which assumes the other WI owners decide to non-consent in the wells. I've attached the new WI [REDACTED] and the updated CAPEX split into Drilling/Completion, totaling to [REDACTED], and taking [REDACTED] of that value.

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Thanks,

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10

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12

Lacy Lloyd
Reservoir Engineer
lacy.lloyd@nexteraenergy.com
601 Travis Street, Suite 1900, Houston, Texas 77002
Work 713.374.1540
Mobile 713.314.6618

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<image003.jpg>

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Working Interest Revenue Interest Fixed Cost RIG PAD Value m\$

Case Name	Working Interest	Revenue Interest	Fixed Cost	RIG	PAD	Value m\$
1 All Cases {Count=38} {Totals=Top}						
2 Proved Undeveloped {Count=25} {Totals=Top}						
4 TYPE CURVE AREA 1 {Count=13} {Totals=Top}						
5 7N-17E-16 PUD (East)				RIG 2	PAD 4	
6 7N-17E-16 PUD (Mid)				RIG 2	PAD 4	
7 7N-17E-17 PUD (Mid)				RIG 2	PAD 5	
8 7N-17E-17 PUD (West)				RIG 2	PAD 5	
9 7N-17E-18 PUD (Mid)				RIG 2	PAD 6	
10 7N-17E-19 PUD (Mid)				RIG 2	PAD 6	
11 7N-17E-20 PUD (Mid)				RIG 2	PAD 5	
12 7N-17E-20 PUD (West)				RIG 2	PAD 5	
13 7N-17E-21 PUD (Mid)				RIG 2	PAD 3	
14 7N-17E-28 PUD (Mid)				RIG 2	PAD 3	
15 7N-17E-29 PUD (SL Mid)				RIG 2	PAD 8	
16 7N-17E-30 PUD (East)				RIG 2	PAD 7	
17 7N-17E-30 PUD (West)				RIG 2	PAD 7	
18 TYPE CURVE AREA 2 {Count=12} {Totals=Top}						
19 7N-17E-13 PUD (Mid)				RIG 1	PAD 3	
20 7N-17E-14 PUD (Mid)				RIG 1	PAD 4	
21 7N-17E-15 PUD (Mid)				RIG 2	PAD 1	
22 7N-17E-15 PUD (West)				RIG 2	PAD 1	
23 7N-17E-22 PUD (Mid)				RIG 2	PAD 2	
24 7N-17E-23 PUD (Mid)				RIG 1	PAD 5	
25 7N-17E-24 PUD (Mid)				RIG 1	PAD 3	
26 7N-17E-26 PUD (West)				RIG 1	PAD 6	
27 7N-17E-27 PUD (East)				RIG 1	PAD 6	
28 7N-17E-27 PUD (Mid)				RIG 2	PAD 2	
29 7N-18E-18 PUD (Mid)				RIG 1	PAD 2	
30 7N-18E-19 PUD (Mid)				RIG 1	PAD 1	
31 Probable Undeveloped {Count=13} {Totals=Top}						
32 TYPE CURVE AREA 1 {Count=3} {Totals=Top}						
33 7N-17E-21 PROB (East)				RIG 2	PAD 3	
34 7N-17E-28 PROB (East)				RIG 2	PAD 3	
35 7N-17E-29 PROB (SL West)				RIG 2	PAD 8	
36 TYPE CURVE AREA 2 {Count=10} {Totals=Top}						
37 7N-17E-13 PROB (West)				RIG 1	PAD 3	
38 7N-17E-14 PROB (East)				RIG 1	PAD 4	
39 7N-17E-22 PROB (West)				RIG 2	PAD 2	
40 7N-17E-23 PROB (East)				RIG 1	PAD 5	
41 7N-17E-24 PROB (West)				RIG 1	PAD 3	
42 7N-17E-26 PROB (East)				RIG 1	PAD 5	
43 7N-17E-26 PROB (Mid)				RIG 1	PAD 5	
44 7N-17E-27 PROB (West)				RIG 2	PAD 2	
45 7N-18E-18 PROB (East)				RIG 1	PAD 2	
46 7N-18E-19 PROB (East)				RIG 1	PAD 1	

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Florida Power & Light Company
 Docket No. 140001-EI
 OPC's 4th Request for POD's
 Request No. 11

6/11/2014 1:04:16PM

Economic One-Liners

As of Date: 7/1/2014

Project Name : Woodford Dry Analysis
 Ownership Group : All Cases

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B C D E F G H I J K L

Lease Name <i>Risked / UnRisked</i>	Gross Reserves		Net Reserves		Net Revenue			Expense & Tax (M\$)	Invest. (M\$)	Cash Flow	
	Oil (Mbbl)	Gas (MMcf)	Oil (Mbbl)	Gas (MMcf)	Oil (M\$)	Gas (M\$)	Other (M\$)			Non-Disc. (M\$)	Disc. CF (M\$)
Grand Total	0.00	251,471.37	0.00	96,845.42	0.00		0.00				
Proved Undeveloped Rsv Class & Category	0.00	161,720.72	0.00	60,960.80	0.00		0.00				
Proved Undeveloped Rsv Class & Category											
TYPE CURVE AREA 1 Field	0.00	73,019.84	0.00	28,632.46	0.00		0.00				
7N-17E-16 PUD (East)	0.00	5,721.12	0.00	1,305.21	0.00		0.00				
7N-17E-16 PUD (Mid)	0.00	5,721.12	0.00	1,305.21	0.00		0.00				
7N-17E-17 PUD (Mid)	0.00	5,718.25	0.00	1,781.43	0.00		0.00				
7N-17E-17 PUD (West)	0.00	5,718.25	0.00	1,781.43	0.00		0.00				
7N-17E-18 PUD (Mid)	0.00	5,716.79	0.00	2,514.45	0.00		0.00				
7N-17E-19 PUD (Mid)	0.00	5,716.79	0.00	1,746.73	0.00		0.00				
7N-17E-20 PUD (Mid)	0.00	5,718.25	0.00	1,888.98	0.00		0.00				
7N-17E-20 PUD (West)	0.00	5,718.25	0.00	1,888.98	0.00		0.00				
7N-17E-21 PUD (Mid)	0.00	5,722.54	0.00	1,825.91	0.00		0.00				
7N-17E-28 PUD (Mid)	0.00	5,722.54	0.00	3,297.65	0.00		0.00				
7N-17E-29 PUD (SL Mid)	0.00	4,395.28	0.00	2,650.20	0.00		0.00				
7N-17E-30 PUD (East)	0.00	5,715.33	0.00	3,323.15	0.00		0.00				
7N-17E-30 PUD (West)	0.00	5,715.33	0.00	3,323.15	0.00		0.00				
Proved Undeveloped Rsv Class & Category											
TYPE CURVE AREA 2 Field	0.00	88,700.88	0.00	32,328.34	0.00		0.00				
7N-17E-13 PUD (Mid)	0.00	7,391.70	0.00	2,138.22	0.00		0.00				
7N-17E-14 PUD (Mid)	0.00	7,388.92	0.00	2,121.50	0.00		0.00				
7N-17E-15 PUD (Mid)	0.00	7,397.19	0.00	1,786.25	0.00		0.00				
7N-17E-15 PUD (West)	0.00	7,397.19	0.00	1,786.25	0.00		0.00				
7N-17E-22 PUD (Mid)	0.00	7,393.54	0.00	2,516.99	0.00		0.00				
7N-17E-23 PUD (Mid)	0.00	7,386.11	0.00	2,450.86	0.00		0.00				
7N-17E-24 PUD (Mid)	0.00	7,391.70	0.00	2,282.67	0.00		0.00				
7N-17E-26 PUD (West)	0.00	7,384.22	0.00	3,847.18	0.00		0.00				
7N-17E-27 PUD (East)	0.00	7,384.22	0.00	4,494.13	0.00		0.00				
7N-17E-27 PUD (Mid)	0.00	7,393.54	0.00	4,499.81	0.00		0.00				
7N-18E-18 PUD (Mid)	0.00	7,395.37	0.00	2,375.14	0.00		0.00				
7N-18E-19 PUD (Mid)	0.00	7,397.19	0.00	2,029.34	0.00		0.00				
Probable Undeveloped Rsv Class & Category	0.00	89,750.65	0.00	35,884.62	0.00		0.00				

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Florida Power & Light Company
 Docket No. 140001-EI
 OPC's 4th Request for POD's
 Request No. 11

B C D E F G H I J K L

Economic One-Liners

As of Date: 7/1/2014

6/11/2014 1:04:16PM

Project Name : Woodford Dry Analysis

Ownership Group : All Cases

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Lease Name <i>Risked / UnRisked</i>	Gross Reserves		Net Reserves		Net Revenue			Expense & Tax (MS)	Invest. (MS)	Cash Flow	
	Oil (Mbbbl)	Gas (MMcf)	Oil (Mbbbl)	Gas (MMcf)	Oil (MS)	Gas (MS)	Other (MS)			Non-Disc. (MS)	Disc. CF (MS)
Probable Undeveloped Rsv Class & Category											
TYPE CURVE AREA 1 Field											
	0.00	15,840.36	0.00	7,773.76	0.00		0.00				
7N-17E-21 PROB (East)	0.00	5,722.54	0.00	1,825.91	0.00		0.00				
7N-17E-28 PROB (East)	0.00	5,722.54	0.00	3,297.65	0.00		0.00				
7N-17E-29 PROB (SL West)	0.00	4,395.28	0.00	2,650.20	0.00		0.00				
Probable Undeveloped Rsv Class & Category											
TYPE CURVE AREA 2 Field											
	0.00	73,910.29	0.00	28,110.86	0.00		0.00				
7N-17E-13 PROB (West)	0.00	7,391.70	0.00	2,138.22	0.00		0.00				
7N-17E-14 PROB (East)	0.00	7,388.92	0.00	2,121.50	0.00		0.00				
7N-17E-22 PROB (West)	0.00	7,393.54	0.00	2,516.99	0.00		0.00				
7N-17E-23 PROB (East)	0.00	7,386.11	0.00	2,450.86	0.00		0.00				
7N-17E-24 PROB (West)	0.00	7,391.70	0.00	2,282.67	0.00		0.00				
7N-17E-26 PROB (East)	0.00	7,386.11	0.00	3,848.17	0.00		0.00				
7N-17E-26 PROB (Mid)	0.00	7,386.11	0.00	3,848.17	0.00		0.00				
7N-17E-27 PROB (West)	0.00	7,393.54	0.00	4,499.81	0.00		0.00				
7N-18E-18 PROB (East)	0.00	7,395.37	0.00	2,375.14	0.00		0.00				
7N-18E-19 PROB (East)	0.00	7,397.19	0.00	2,029.34	0.00		0.00				

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Results of FPL's Economic Evaluation

Period	Year	A	B	C	D	E	F = C + D + E	G = F / B	H	I = B x (H-G)	J	K = I x J
		Annual Production (Bcf)	Operating Expenses (\$MM)	Depreciation (\$MM)	Return Rate ⁽²⁾ (\$MM)	Revenue Requirement (\$MM)	Effective Cost (\$/MMBtu)	FPL Market Price Forecast (\$/MMBtu)	Undiscounted Customer Savings (\$MM)	FPL Discount Factor	Discounted Customer Savings (\$MM)	
1	2015	15.6						\$3.48	\$4.02	\$8.4	0.9302	\$7.8
2	2016	16.8						\$3.56	\$4.30	\$12.4	0.8649	\$10.7
3	2017	11.3						\$4.00	\$4.70	\$8.0	0.8043	\$6.4
4	2018	8.7						\$4.40	\$5.74	\$11.6	0.7480	\$8.7
5	2019	7.1						\$4.96	\$5.89	\$6.6	0.6956	\$4.6
6	2020	6.1						\$4.79	\$6.03	\$7.6	0.6468	\$4.9
7	2021	5.3						\$4.94	\$6.13	\$6.3	0.6015	\$3.8
8	2022	4.7						\$5.08	\$6.33	\$5.9	0.5594	\$3.3
9	2023	4.3						\$5.21	\$6.63	\$6.1	0.5202	\$3.2
10	2024	3.9						\$5.34	\$7.03	\$6.6	0.4837	\$3.2
11	2025	3.6						\$5.24	\$7.33	\$7.5	0.4498	\$3.4
12	2026	3.3						\$5.32	\$7.63	\$7.7	0.4183	\$3.2
13	2027	3.1						\$5.39	\$7.93	\$7.9	0.3890	\$3.1
14	2028	2.9						\$5.46	\$8.33	\$8.4	0.3617	\$3.1
15	2029	2.8						\$5.52	\$8.63	\$8.6	0.3364	\$2.9
16	2030	2.6						\$5.58	\$8.83	\$8.4	0.3129	\$2.6
17	2031	2.4						\$5.65	\$9.17	\$8.6	0.2910	\$2.5
18	2032	2.3						\$5.71	\$9.52	\$8.7	0.2705	\$2.4
19	2033	2.2						\$5.80	\$9.88	\$8.8	0.2516	\$2.2
20	2034	2.0						\$5.88	\$10.26	\$8.8	0.2340	\$2.1
21	2035	1.9						\$5.97	\$10.65	\$8.9	0.2176	\$1.9
22	2036	1.8						\$6.05	\$11.06	\$9.0	0.2023	\$1.8
23	2037-65	23.1						\$7.88	\$17.16	\$213.8	0.0894	\$19.1
24	Totals ⁽¹⁾	137.8	\$323.2	\$190.8	\$195.5	\$709.4				\$394.7		\$106.9

25 Notes:

- 26 (1) Totals are for 2015-2065, an assumed 50 year project life. Totals may not add due to rounding.
- 27 (2) Return rate includes return on the assets and return of financing costs.
- 28 (3) Based on discount rate of 7.5%, which reflects FPL's weighted average cost of capital

**Florida Power & Light Company
Docket No. 140001-EI
OPC's 4th Request for POD's
Attachment I / Request No. 12**

Documents responsive to OPC's Fourth Request for Production of Documents No. 12 (Bates No. FCR-14-00743 through FCR-14-01225) are confidential in their entirety.

A

1 Q. According to page 13 of the Petition, under item 27, FPL "... had initial
2 conversations with more than 25 counterparties" and exchanged data with certain
3 counterparties. Please identify the "more than 25 counterparties" referenced and
4 separately identify the potential counterparties that FPL eventually exchanged data
5 with.
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7 A. Over the course of FPL's endeavor to acquire an interest in the production of shale gas,
8 FPL had conversations with the following (those who exchanged data are in bold):
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Q.

Please refer to the direct testimony of Sam Forrest, from page 32, line 11 to page 33, line 6. With regards to the other 40% over the 19 sections of the Area of Mutual Interest (AMI) that is "represented by other organization or individuals" and their varying rights to non-consent to the 38 proposed future wells, please respond to the following:

- a. Please identify the other organization or individuals that have consent rights on the remaining 40% of the 19 sections of the AMI, and what percentage they own.
- b. Please provide a detailed explanation of all contact FPL, USG, or any of its affiliates have had with the other organizations and individuals regarding their intentions regarding consent or non-consent.
- c. For the remaining 40% represented by the other organizations or individuals, please identify the portion of the 40% for which the other organizations or individuals have expressed that they intend to non-consent to the 38 proposed wells.
- d. Please indicate if FPL (or its subsidiary) would have first right to consent if the organizations or individuals opt for non-consent. If not, please indicate at which level FPL's or its subsidiaries' consent rights would start (i.e., how many other entities above FPL or its subsidiary would have the first right to consent in such situations before FPL or its subsidiary has the right to consent).
- e. Please explain whether all partners with PetroQuest in the AMI are jointly and severally liable for all costs associated with accidents, fines, pollution cleanup, site restoration, negligence by PetroQuest or any of the partners, additional regulations, and any other future costs known or unknown at this time; and, as part of this response, please explain how and whether the ratepayers or shareholders will be responsible for any of these potential costs.

A.

a) Currently, FPL is aware of [REDACTED], [REDACTED], [REDACTED], [REDACTED] and others. FPL and its affiliates have had no contact with other working interest owners and are not aware of their intentions to consent or non-consent. Upon consent, FPL and any other consenting 3rd party working interest owner will have a non-operating working interest in these gas leases. Non-operating working interests can be freely bought and sold as a security. So the non-operating working interest owner yesterday may change from day to day. In FPL's agreement with PetroQuest, FPL's only notice obligation is to PetroQuest for a transfer of our title/interest. It is likely that is true for other non-operating working interest owners. It is unlikely that FPL would know or have a right to know the disposition of a third party's working interest. FPL's base case model assumes, for purposes of presenting the highest expected capex, that all other working interest

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**Response to Question 36
 Results of FPL's Economic Evaluation @ 10% Discount Rate**

	A	B	C	D	E	F=C+D+E	G=F/B	H	I=B x (H-G)	J	K=I x J
	Year	Annual Production (Bcf)	Operating Expenses (\$MM)	Depreciation (\$MM)	Return Rate ⁽²⁾ (\$MM)	Revenue Requirement (\$MM)	Effective Cost (\$/MMBtu)	FPL Market Price Forecast (\$/MMBtu)	Undiscounted Customer Savings (\$MM)	FPL Discount Factor	Discounted Customer Savings (\$MM)
1											
2											
3											
4	2015	15.6					\$3.48	\$4.02	\$8.4	0.9093	\$7.7
5	2016	16.8					3.6	4.3	12.4	0.8264	10.3
6	2017	11.3					4.0	4.7	8.0	0.7513	6.0
7	2018	8.7					4.4	5.7	11.6	0.6830	7.9
8	2019	7.1					5.0	5.9	6.6	0.6209	4.1
9	2020	6.1					4.8	6.0	7.6	0.5643	4.3
10	2021	5.3					4.9	6.1	6.3	0.5130	3.2
11	2022	4.7					5.1	6.3	5.9	0.4664	2.8
12	2023	4.3					5.2	6.6	6.1	0.4240	2.6
13	2024	3.9					5.3	7.0	6.6	0.3853	2.6
14	2025	3.6					5.2	7.3	7.5	0.3503	2.6
15	2026	3.3					5.3	7.6	7.7	0.3185	2.5
16	2027	3.1					5.4	7.9	7.9	0.2895	2.3
17	2028	2.9					5.5	8.3	8.4	0.2631	2.2
18	2029	2.8					5.5	8.6	8.6	0.2392	2.0
19	2030	2.6					5.6	8.8	8.4	0.2175	1.8
20	2031	2.4					5.6	9.2	8.6	0.1977	1.7
21	2032	2.3					5.7	9.5	8.7	0.1797	1.6
22	2033	2.2					5.8	9.9	8.8	0.1633	1.4
23	2034	2.0					5.9	10.3	8.8	0.1485	1.3
24	2035	1.9					6.0	10.6	8.9	0.1350	1.2
25	2036	1.8					6.1	11.1	9.0	0.1227	1.1
26	2037-65	23.1					7.9	17.2	213.8	0.0445	9.5
27	Totals ⁽¹⁾	137.8	\$323.2	\$190.8	\$195.5	\$709.4			\$394.7		\$82.6

33 **Notes:**
 34 (1) Totals are for 2015-2065, an assumed 50 year project life. Totals may not add due to rounding.
 35 (2) Return rate includes return on the assets and financing costs.

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d. Please refer to the table provided in response to OPC's 3rd Interrogatories No. 37(c). The return is calculated based on the average rate base for the respective period.

e. Please refer to the table provided in response to OPC's 3rd Interrogatories No. 37(c).

f. Please refer to the response provided for Staff's 2nd Interrogatories No. 21(a,c).

g. Please refer to the table provided for OPC 3rd Interrogatories No. 37(c). Within this response, refer to the "Financing Costs" column. This column represents the "return of the financing costs", namely interest expense. Interest expense is calculated by applying the debt ratio of [REDACTED] to the respective periods' average rate base, and then multiplying that by the assumed debt cost rate of [REDACTED] %.

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Response to Question 37(a) Operating Expense Breakdown

	A	B	C	D	E	F	G	H
	A	i	ii	iii	iv	v	vi	C = i + ii + iii + iv + v + vi
		Lease Operating Expense (\$MM)	Gathering Costs (\$MM)	Long-Haul Costs (\$MM)	Business Management Fee (\$MM)	Severance Tax (\$MM)	State Franchise Tax (\$MM)	Operating Expenses (\$MM)
1	Year							
2	2015							
3	2016							
4	2017							
5	2018							
6	2019							
7	2020							
8	2021							
9	2022							
10	2023							
11	2024							
12	2025							
13	2026							
14	2027							
15	2028							
16	2029							
17	2030							
18	2031							
19	2032							
20	2033							
21	2034							
22	2035							
23	2036							
24	2037-65							
25	Totals							\$323.2

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Response to Question 37(c)

	A	B	C	D	E	F	G	H
	A	i	ii = i x 40.4%	iii = ii x 5.1%	iv = i x 59.6%	v = iv x 10.5%	vi = v x (1/(1+38.9%)-1)	E = iii + v + vi
	Year	Average Rate Base (\$MM)	Average Debt Balance (\$MM)	Financing Costs (\$MM)	Average Equity Base (\$MM)	After-Tax Equity Return on Assets (\$MM)	Gross-up for Income Tax (\$MM)	Return Rate (\$MM)
2								
3								
4								
5	2015							
6	2016							
7	2017							
8	2018							
9	2019							
10	2020							
11	2021							
12	2022							
13	2023							
14	2024							
15	2025							
16	2026							
17	2027							
18	2028							
19	2029							
20	2030							
21	2031							
22	2032							
23	2033							
24	2034							
25	2035							
26	2036							
27	2037-65 ⁽¹⁾							
28	Totals							\$195.

29 (1) This amount represents the cumulative average rate base from 2037-65. The average rate base during this period declines according to units of production.

CONFIDENTIAL

Florida Power & Light Company
Docket No. 140001-EI
OPC's 3rd Set of Interrogatories
Interrogatory No. 45
Page 1 of 1

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Q. In reference to Confidential Exhibit SF-9, at page 1 of 4, Guideline I.A, please provide the "Maximum Volume as a Percentage of Average Daily Burn" for 2015, 2016, and 2017 in terms of Mcf of gas quantities.

A. The maximum gas quantity based on Guideline I.A is approximately [redacted] Mcf/day or [redacted] Bcf/year in 2015, [redacted] Mcf/day or [redacted] Bcf/year in 2016, and [redacted] Mcf/day or [redacted] Bcf/year in 2017. This is based on the projected gas usage as filed in FPL's most recent Ten Year Site Plan.

CONFIDENTIAL

Florida Power & Light Company
Docket No. 140001-EI
OPC's 3rd Set of Interrogatories
Interrogatory No. 46
Page 1 of 1

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Q.

In reference to Confidential Exhibit SF-9, at page 1 of 4, Guideline 1.A, given the high depletion rate of a well in its early years of production, please describe how many "producing" wells (and at what volumes of gas) FPL will need to attain in order to reach "Maximum Volume as a Percentage of Average Daily Burn" shown on this exhibit in 2015, 2016, 2017, and will that continue to increase in subsequent years?

A.

The Woodford Project represents 38 producing wells that are expected to produce approximately [redacted] Bcf (billion cubic feet) in 2015, [redacted] Bcf in 2016, [redacted] Bcf in 2017, and [redacted] Bcf in 2018. Based on these production rates the number of wells required to reach the maximum volume as a percentage of average daily burn using gas usage projection as filed in FPL's most recent Ten Year Site Plan is [redacted] wells in 2015, [redacted] wells in 2016 and [redacted] wells in 2017. If the percentage of the average daily burn is held at [redacted] in 2018, the number of wells will continue to increase due to depletion of the earlier wells. For 2018, the number of wells required to maintain [redacted] of the average daily burn increases to [redacted].

EXHIBIT C

CONFIDENTIAL

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET TITLE: Fuel and Purchase Power Cost Recovery Clause and Generating Performance Incentive Factor
DOCKET NO.: 140001-EI
DATE: September 11, 2014

Party	Set	Conf Y/N	Bates Number	Line/Column	366.093 (3) F.S.	Affiant
OPC	4 th POD No. 9	Y	FCR-14-00700	Col. E, Line 31 Col. C, Line 32 Col. D, Line 33	(d), (e)	Sam Forrest
			FCR-14-00702	Col. D, Lines 9-17		
			FCR-14-00705	Col. B, Lines 4-5		
OPC	4 th POD No. 10	Y	FCR-14-00706-00709	All	(e)	Timothy D. Taylor, PhD
			FCR-14-00711	Col. B, Line 10		
			FCR-14-00717	Col. C, Line 11 Col. A, Line 12 Col. B, Line 19		
			FCR-14-00718	Col. C, Line 4 Cols. A,B, Line 5		
			FCR-14-00722	Col. C, Line 16 Col. A, Line 17 Col. B, Line 24		
FCR-14-00723	Col. C, Line 8 Cols. A,B, Line 9					

Party	Set	Conf Y/N	Bates Number	Line/Column	366.093 (3) F.S.	Affiant
OPC	4 th POD No. 10 (Cont'd)	Y	FCR-14-00725	Cols. C,E, Line 4 Col. B, Line 11 Cols. D, F, Line 31 Col. A, Line 32	(e)	Timothy D. Taylor, PhD
			FCR-14-00728	Cols. C,D, Line 29		
			FCR-14-00729	Col. C, Line 3 Col. D, Line 24 Col. B, Line 25		
			FCR-14-00730	Cols. C,D, Line 6 Col. B, Line 13		
			FCR-14-00731	Cols. B,C, Line 6		
			FCR-14-00732	Cols. C,D,E, Line 7 Col. B, Line 12		
			FCR-14-00733	Col. C, Line 4 Cols. B,D, Line 5		
OPC	4 th POD No. 11	Y	FCR-14-00738	Cols. C, D, E, H, Lines 5-17, 19-30, 33-35, 37-46	(e)	Timothy D. Taylor, PhD
			FCR-14-00740	Col. G,I,J,K,L, Lines 7-8, 10-23, 25-38		
			FCR-14-00741	Col. G,I,J,K,L, Lines 8-11, 13-23		
OPC	4 th PODs No. 12	Y	FCR-14-00742	Col. C-F, Lines 1-23	(e)	Melissa Linton
		FCR-14-00743 thru 01225	All			

Party	Set	Conf Y/N	Pages	Line/Column	366.093 (3) F.S.	Affiant
OPC	3 rd Set of Interrogatories No.27	Y	1 of 1	Col. A, Lines 10-37	(e)	Sam Forrest
OPC	3 rd Set of Interrogatories No.33	Y	1 of 2	Col. C,D,E,F, Line 28	(e)	Sam Forrest
OPC	3 rd Set of Interrogatories No.36 Attachment 1	Y	1 of 1	Cols. C-F, Lines 4-26	(e)	Melissa Linton
OPC	3 rd Set of Interrogatories No.37	Y	2 of 2	Col. B, Line 10 Col. C, Line 11	(e)	Melissa Linton
OPC	3 rd Set of Interrogatories No.37 Subpart a	Y	1 of 1	Cols. B-H, Lines 6-28 Cols. B-G, Line 29	(e)	Melissa Linton
OPC	3 rd Set of Interrogatories No.37 Subpart c	Y	1 of 1	Cols. B-H, Lines 5-27 Cols. D-G, Line 28	(e)	Melissa Linton
OPC	3 rd Set of Interrogatories No.45	Y	1 of 1	Cols. D,E, Line 6 Col. B-E, Line 7	(e)	Sam Forrest
OPC	3 rd Set of Interrogatories No.46	Y	1 of 1	Cols. C, F, I, Line 10 Col. B, Line 11 Cols. G, J, Line 13 Col. D, Line 14 Col. B, Line 15 Col. H, Line 16 Col. E, Line 17	(e)	Sam Forrest

EXHIBIT D

CONFIDENTIAL

EXHIBIT D
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Fuel and purchased power cost recovery clause
with generating performance incentive factor

Docket No: 140001-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

AFFIDAVIT OF SAM FORREST

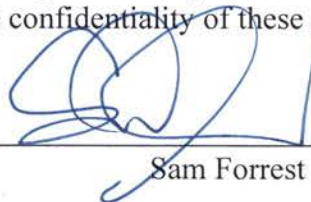
BEFORE ME, the undersigned authority, personally appeared Sam Forrest who, being first duly sworn, deposes and says:

1. My name is Sam Forrest. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of the Energy Marketing and Trading ("EMT") Business Unit. My business address is 700 Universe Boulevard, Juno Beach, Florida 33408. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in Florida Power & Light Company's ("FPL") Request for Confidential Classification concerning information provided in response to OPC's Third Set of Interrogatories to Florida Power & Light Company (Nos. 27, 33, 45 and 46) and OPC's Fourth Production of Documents request (No. 9) for which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed contain proprietary confidential business information, including information concerning bids or other contractual data. Disclosure of this information would violate nondisclosure provisions of FPL's contracts with certain vendors and impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. In addition, this information relates to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding gas volumes and burn rates. The disclosure of this proprietary confidential business information would provide other participants in the fuel and financial markets insight into FPL's hedging practices that would allow them to anticipate FPL's trading decisions and impair FPL's ability to negotiate, to the detriment of FPL and its customers. Disclosure of this information would also place FPL at a competitive disadvantage when coupled with other information that is publicly available. 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.



Sam Forrest

SWORN TO AND SUBSCRIBED before me this 9th day of September, 2014, by Sam Forrest, 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



EXHIBIT D
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Fuel and purchased power cost recovery clause
with generating performance incentive factor

Docket No: 140001-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

AFFIDAVIT OF MELISSA LINTON


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

1. My name is Melissa Linton. I am currently employed by Florida Power & Light Company as Director of Finance, Forecast, Strategy and Analysis. My business address is 700 Universe Blvd., Juno Beach, Florida, 33408. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in Florida Power & Light Company's ("FPL") Request for Confidential Classification concerning information provided with its Petition for Prudence Determination Regarding Acquisition of Gas Reserves for which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed (OPC 4th POD 12 and OPC 3rd INT 36, 37, 37 subpart "a", and 37 subpart "c"), contain proprietary confidential business information, including information relating to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding gas reserves estimates, projected economics and other terms. The disclosure of this proprietary confidential business information would provide other participants in the fuel and financial markets insight into FPL's hedging practices that would allow them to anticipate FPL's trading decisions and impair FPL's ability to negotiate for these commodities, to the detriment of FPL and its customers. Disclosure of this information would also place FPL at a competitive disadvantage when coupled with other information that is publicly available. 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 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.



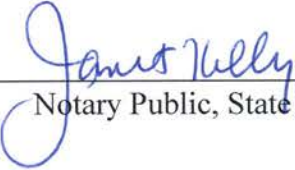
Melissa Linton

SWORN TO AND SUBSCRIBED before me this 9th day of September 2014, by Melissa Linton who is personally known to me or who has produced drivers license (type of identification) as identification and who did take an oath.

My Commission Expires: 11-24-2017



JANET KELLY
NOTARY PUBLIC
STATE OF FLORIDA
Comm# FF072656
Expires 11/24/2017



Notary Public, State of Florida

**EXHIBIT D
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Fuel and purchased power cost recovery clause
with generating performance incentive factor

Docket No: 140001-EI

STATE OF TEXAS)
)
COUNTY OF HARRIS)

AFFIDAVIT OF TIMOTHY D. TAYLOR, PhD

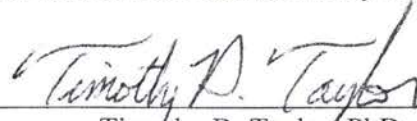
BEFORE ME, the undersigned authority, personally appeared Timothy D. Taylor, PhD who, being first duly sworn, deposes and says:

1. My name is Timothy D. Taylor, PhD. I am currently employed by NextEra Energy Project Management, LLC, as Chief Technology Officer of the Gas Infrastructure and Development business unit. My business address is 601 Travis, Suite 1900 Houston, Texas, 77002. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in Florida Power & Light Company's ("FPL") Request for Confidential Classification concerning information provided with its Petition for Prudence Determination Regarding Acquisition of Gas Reserves for which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed contain proprietary confidential business information, including information relating to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding gas reserves estimates, projected economics and other terms. The disclosure of this proprietary confidential business information would provide other participants in the fuel and financial markets insight into FPL's hedging practices that would allow them to anticipate FPL's trading decisions and impair FPL's ability to negotiate for these commodities, to the detriment of FPL and its customers. Disclosure of this information would also place FPL at a competitive disadvantage when coupled with other information that is publicly available. 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 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.

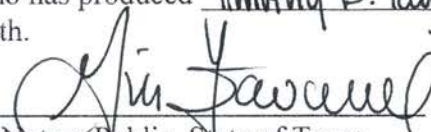
4. Affiant says nothing further.



Timothy D. Taylor, PhD

SWORN TO AND SUBSCRIBED before me this 4 day of September 2014, by Timothy D. Taylor, PhD who is personally known to me or who has produced Timothy D. Taylor (type of identification) as identification and who did take an oath.

My Commission Expires:



Notary Public, State of Texas

