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May 9, 2016

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

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COMMISSION
CLERK

Re: Docket No. 160096-EI

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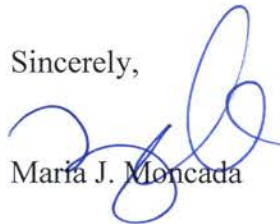
Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's Request for Confidential Classification of Information Provided in Response to Staff's First Data Request (Nos. 9 and 11-15). The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declaration in support of FPL's request.

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

Sincerely,



Maria J. Moncada

Enclosure

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

COM
AFD Redacted
APA
ECO
ENG
GCL
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition for approval of modifications to risk management plans by Duke Energy Florida, Florida Power & Light Company, Gulf Power Company and Tampa Electric Company

Docket No: 160096-EI

Date: May 9, 2016

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

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain information provided in response to the Staff of the Florida Public Service Commission's ("Staff") First Data Request (Nos. 9 and 11-15) ("Confidential Responses"). In support of its Request, FPL states as follows:

1. On April 28, 2016, Staff served its First Data Request (Nos. 1-15) on FPL. FPL's Response to Staff's First Data Request (Nos. 9 and 11-15) contain information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's First Data Request (Nos. 1-15) on May 9, 2016. This request is being filed contemporaneously with the service of the responses to Staff's data request in order to request confidential classification of the Confidential Responses consistent with Rule 25-22.006, Florida Administrative Code.

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

a. Exhibit A consists of a copy of the Confidential Responses, in which all of the information that FPL asserts is entitled to confidential treatment has been highlighted.

b. Exhibit B consists of a copy of the Confidential Responses in which all of the information that FPL asserts is entitled to confidential treatment has been redacted.

c. Exhibit C is a table that identifies the information highlighted in Exhibit A, together with references to the specific statutory bases for the claim of confidentiality and to the declarant who supports the requested confidential classification.

d. Exhibit D is the declaration of Gerard J. Yupp in support of this request.

4. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. 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 determined 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 the description included in Exhibit C and the declaration included in Exhibit D indicate, the Confidential Responses provided by FPL contains information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Additionally, certain information relates to the competitive interests of FPL and its vendors, the disclosure of which would impair their competitive interests. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. Upon a finding by the Commission that the Confidential Responses in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), F.S., such materials 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. § 366.093(4), Fla. Stat.

WHEREFORE, FPL respectfully requests confidential classification of the Confidential Responses described herein.

Respectfully submitted this 9th day of May 2016.

R. Wade Litchfield, Esq.,
Vice President and General Counsel
John T. Butler, Esq.
Assistant General Counsel-Regulatory
Maria J. Moncada, Esq.
Senior Attorney
Florida Power & Light Company
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Telephone: (561) 304-5795
Facsimile: (561) 691-7135

By: _____



Maria J. Moncada
Fla. Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 160096-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification* has been furnished by electronic service on this 9th day of May 2016 to the following:

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By: 

Maria J. Moncada
Fla. Bar No. 0773301

* 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

Q.

Please refer to last sentence of paragraph 8. As of the time of this interrogatory, what percentage of FPL's hedges for 2017 procurement has been executed?

- a. For FPL, please refer to Exhibit 2, page 6, and to the sentence "FPL will not financially hedge its projected natural gas requirements beyond the end of calendar year 2017."
- b. Please explain this sentence and its effect.

A.

1 As of April 30, 2016, FPL has hedged █████^A of its projected 2017 natural gas consumption.
2 Financial hedges account for █████^A and gas reserves account for █████^B of the projected 2017
3 consumption. This represents approximately one third of the hedging target level in the
4 original 2016 Risk Management Plan.

- a. N/A
- b. Please see FPL's responses to Data Request Nos. 3 and 4.

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Docket No. 160096-EI
Staff's First Data Request
Question No. 11
Page 1 of 1

Q.

If the hedging contracts in place for 2015 for FPL had been reduced by 25%, how much would FPL have saved compared to actual results? Please state any assumptions that might underlie this calculation.

A.

As described in response to Staff's First Data Request No. 6, if one were to assume that all of the execution parameters (timing, term, and pricing) of FPL's financial hedges remained the same between its actual hedges for 2015 and the financial hedges it would have executed under the 25% reduced target, costs (losses) associated with FPL's financial hedges would have been reduced by 25%, or approximately [REDACTED]^A. However, as stated in response to Staff's First Data Request No. 6, the actual result would likely be somewhat different in practice as lowering the hedging target would have required some deviation in execution parameters which would likely have generated a slightly different outcome.

1
2
3
4

Q. What natural gas hedging savings (costs) and hedging volumes have been incurred by FPL for the period January-March, 2016?

A.

1 From January to March 2016, FPL hedged [REDACTED]^A MMBtu of natural gas using financial
2 swaps and realized a hedging cost of [REDACTED]^A From January to March 2016, FPL
3 received [REDACTED]^A MMBtu of natural gas from the Woodford project and realized a hedging
4 cost of [REDACTED]^A.

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Staff's First Data Request
Question No. 13
Page 1 of 1

Q.

If the proposed reductions detailed in the Joint Petition would have been in place during the January-March 2016 period, what natural gas hedging savings (costs) would FPL have incurred?

A.

Utilizing the data provided in response to Staff's First Data Request No. 12 for financial hedges and the assumptions referred to in response to Staff's First Data Request No. 6 and Staff's First Data Request No. 11, hedging costs (losses) would have been reduced by approximately [REDACTED]^A (25%) during the January-March 2016 period.

1

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Staff's First Data Request
Question No. 14
Page 1 of 1**

Q.

What natural gas hedging savings (costs) and hedging volumes is FPL estimating for the period April-December 2016?

A.

1 FPL currently projects financial hedging costs of [REDACTED]^A for the April to December
2 2016 period based on market prices as of May 2, 2016. The financial swap hedging volumes
3 are projected to be [REDACTED]^A MMBtu. FPL currently projects to receive 12.7 Bcf of
4 natural gas from the Woodford project during the April to December time frame. The
5 Woodford project hedging results for the same period are projected to be [REDACTED]^A based
6 on schedule IIA, included as part of the Hedging Activity Report filed on April 6, 2016.

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Staff's First Data Request
Question No. 15
Page 1 of 1

Q.

If the proposed reductions detailed in the Joint Petition would have been in place during the April-December 2016 period, what are the estimated natural gas hedging savings (costs)?

A.

Utilizing the data provided in response to Staff's First Data Request No. 14 for financial hedges and the assumptions referred to in response to Staff's First Data Request No. 6 and Staff's First Data Request No. 11, FPL is estimating that if the hedges planned for April-December 2016 were reduced by 25%, hedging costs (losses) for that period, given market conditions as of May 2, 2016, would be reduced by approximately [REDACTED]^A(25%).

1

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 160096-EI
DOCKET TITLE: Joint petition for approval of modifications to risk management plans by Duke Energy Florida, Florida Power & Light Company, Gulf Power Company and Tampa Electric Company
SUBJECT: FPL's Responses to Staff's 1st Data Requests Nos. 9 and 11-15
DATE: May 9, 2016

Staff's 1st Data Request (No.)	Pg. No.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
9	1	FPL's hedges for 2017 procurement	Lns. 1A, 2A, 2B	(d), (e)	G. Yupp
11	1	FPL's financial hedges	Ln. 1A	(d), (e)	G. Yupp
12	1	Natural gas hedging savings (costs) and hedging volumes	Lns. 1A, 2A, 3A, 4A	(d), (e)	G. Yupp
13	1	Natural gas hedging savings (costs)	Ln. 1A	(d), (e)	G. Yupp
14	1	Natural gas hedging savings (costs) and hedging volumes	Lns. 1A, 3A, 5A	(d), (e)	G. Yupp
15	1	Natural gas hedging savings (costs)	Ln. 1A	(d), (e)	G. Yupp

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION


In re: Joint petition for approval of modifications to risk management plans by Duke Energy Florida, Florida Power & Light Company, Gulf Power Company and Tampa Electric Company

Docket No: 160096-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

DECLARATION OF GERARD J. YUPP

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 written declaration.
2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business 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 detriment of FPL and its customers and its vendors, and would 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



GERARD J. YUPP

Date: 5/6/16