

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 130001-EI
Date: July 29, 2013

**FLORIDA POWER AND LIGHT COMPANY'S FIRST REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION
OF INFORMATION PROVIDED PURSUANT TO AUDIT NO. 11-129-4-2**

Pursuant to Section 366.093, Florida Statutes (2012) ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its First Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 11-129-4-2 ("Confidential Information"). In support of this request, FPL states as follows:

1. On October 6, 2011 ("October 6, 2011 Request") FPL filed a Request for Confidential Classification of the Confidential Information. The October 6, 2011 Request included Exhibits A, B, C, and D. By Order No. PSC-12-0109-CFO-EG, dated March 13, 2012 ("Order 0109"), the Commission granted FPL's October 6, 2011 Request. FPL adopts and incorporates by reference the October 6, 2011 Request and Order 0109.

2. The period of confidential treatment granted by Order 0109 will soon expire. The Confidential Information that was the subject of FPL's October 6, 2011 Request and Order 0109 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

3. All of the information designated in Exhibit A and Exhibit B to the October 6, 2011 Request remains confidential. Accordingly, those exhibits will not be reproduced or reattached here.

4. Included with this Request are First Revised Exhibit C and First Revised Exhibit D. First Revised Exhibit D consists of the affidavits of Antonio Maceo, Solomon L. Stamm and Gerard J. Yupp in support of this request. Regarding First Revised Exhibit C, all of the information listed in the October 6, 2011 Request remains confidential; that Exhibit is revised only to identify Sol Stamm as a new affiant.

5. The Confidential Information continues to be treated by FPL as proprietary and confidential business information, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, such materials are entitled to confidential treatment and are 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.

6. As the affidavits included in First Revised Exhibit D indicate, certain information provided by FPL contains information related to auditing controls and reports of internal auditing controls and reports of internal auditors or information relating to internal auditing reports issued in 2010 and external auditors or information relating to same, which the external auditors consider to be proprietary and confidential. This information is protected by Section 366.093(3)(b).

7. Some of the documents also contain information concerning bids or contractual data, the disclosure of which would prejudice FPL and its customers, and would impair FPL's efforts to

enter into contracts on commercially favorable terms. Specifically, the information provided by FPL includes oil financial instruments, fuel status and inventory reports, contractual data, and negotiated agreements for services of FPL facilities. This information also relates to FPL's competitive interest. Disclosure would reveal FPL's competitively sensitive procedures and impair the competitive business of the provider of the information. This information is protected from public disclosure pursuant to Section 366.093(3)(d) and (e).

8. Certain materials also contain information related to data pertinent to FPL's procurement activities and hedging program. The documents contain or constitute 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 procedure that would allow them, to anticipate FPL's marketing and trading decision, and/or impair FPL's ability to negotiate, to the detriment of FPL and its customers. Such information is protected by Section 366.093(3)(a),(d) and (e).

9. Additionally, the documents or materials also contain or constitute information regarding physical and financial details related to FPL's annual hedging program for natural gas and fuel oil. The information contains monthly realized values for FPL's hedge positions and resulting impact on the cost of natural gas and fuel oil. The disclosure of this information would impair the efforts of FPL to contract for goods and services on favorable terms for the benefit of its customers, and would impair the competitive interests of FPL and its vendors. Disclosure of certain of the information would also place FPL at a competitive disadvantage when coupled with other

information that is publicly available. This information is protected by Section 366.093(3)(d) and (e).

10. Also, the documents or materials contain the names of financial counterparties with which FPL executes heavy fuel oil hedging transactions. Due to the extremely limited population of potential counterparties that participate in this market, the disclosure of this data would harm the competitive business of FPL and impair the efforts of the Company to contract for hedging instruments on favorable terms. Specifically, the disclosure of the names of certain financial counterparties would reveal transaction frequency and volume between FPL and those financial counterparties. This would harm FPL's efforts to contract with those financial counterparties on favorable terms in the future, to the detriment of FPL and its customers. This information is protected by Section 366.093(3)(e).

11. Nothing has changed since the Commission entered Order 0109 to render the Confidential Information stale or public, such that continued confidential treatment would not be appropriate.

12. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional eighteen (18) month period 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. (2012).

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 First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

John T. Butler
Assistant General Counsel - Regulatory
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By: /s/ Maria J. Moncada
Maria J. Moncada
Florida 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 was served by electronic mail this 29th day of July, 2013 to the following:

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By: /s/ Maria J. Moncada
Maria J. Moncada

FIRST REVISED EXHIBIT C

FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Work Papers
AUDIT: FPL, Hedging Audit
AUDIT CONTROL NO: 11-129-4-2
DOCKET NO.: 130001- EI

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Affiant
2	Filing	24	Y	Pgs 1-24, Col C-F	(a), (e)	G. Yupp
9	List of Internal Audits	4	Y	Pgs 1-4, Col A	(b)	A. Maceo
9-1	Internal Audit Workpaper	10	Y	ALL	(b)	A. Maceo
9-2	External Audit Workpaper	2	Y	ALL	(b)	S. Stamm
12	LFARS Fuel Transaction Register	20	N	Pg 1		S. Stamm
			Y	Pgs 2-7, Cols A-B	(d), (e)	
			N	Pg 8		
			Y	Pgs 9-18, Cols A-B	(d), (e)	
			N	Pgs 19-20		
12-1	FINS Financial Report	2	Y	Pgs 1-2, Cols A-B	(a), (d), (e)	G.Yupp
12-2	LFARS Fuel Transaction Register	21	Y	Pg 1, Col B	(d), (e)	S. Stamm
			Y	Pgs 2-7, Cols A-B	(d), (e)	
			Y	Pg 8, Col B	(d), (e)	
			Y	Pg 9, Cols A-B	(d), (e)	
			N	Pgs 10-11		
			Y	Pgs 12-15, Cols A-B	(d), (e)	
			N	Pg 16		

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Affiant
			Y	Pgs 17-19, Cols A-B	(d), (e)	
			N	Pgs 20-21		
12-3	Accounts 501.115 & 926.226	3	N			
25-1	Incremental Hedging Costs	1	N			
42-1	Trading & Risk Management	78	Y	ALL	(a), (e)	G. Yupp
42-2	Trading & Risk Management	25	Y	ALL	(a), (e)	G. Yupp
42-3	Trading & Risk Management	9	Y	ALL	(a), (e)	G. Yupp
43-1	Derivative Settlements	1	Y	ALL	(a), (e)	G. Yupp
43-1/1	Financial Hedging Instrument	2	N	Pg 1		
			Y	Pg 2, Col A	(a), (d), (e)	G. Yupp
43-1/2	Physical Hedging Transaction	1	N			
43-2	Natural Gas Sample Testing	1	Y	Cols A-F, Lines 1 and 3	(a), (d), (e)	G. Yupp
43-2/1	Derivative Settlements	10	Y	ALL	(a), (d), (e)	G. Yupp
43-2/2	Invoice	2	Y	ALL	(a), (d), (e)	G. Yupp
43-2/3	Purchase Statement	2	Y	Pg 1, Cols A-I, Lines 2, 5, 13-17, 21-23 Pg 2, Cols A-I, Lines 2 and 5	(a), (d), (e)	G. Yupp
43-2/3-1	Swap Deal Entry	22	Y	Pgs 1-22, Cols A-H, Lines 1-3, 12, 19	(a), (d), (e)	G. Yupp
43-2/3-2	Settlement Price	1	N			
43-2/3-3	Platts	3	N			
43-3	Heavy Oil Sample Testing	1	Y	Lines 1-9, 11-12, 14-20	(a), (d), (e)	G. Yupp

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Affiant
43-3/1	Derivative Settlements	2	Y	ALL	(a), (d), (e)	G. Yupp
43-3/2	Derivative Settlements True-Up	2	Y	ALL	(a), (d), (e)	G. Yupp
43-3/2-1	Invoice	3	Y	Pg 1, Lines 1, 11-12, 15, 17-23	(d)	G. Yupp
			Y	Pg 2, Lines 1-5, 9-12, 16, 19		
			Y	Pg 3, Lines 1, 4, 12-18, 22-24, 29-35		
43-3/3	Swap Deal Entry	9	Y	Pg 1, Cols A-H, Lines 1-3, 3, 12, 19	(a), (d), (e)	G. Yupp
			Y	Pg 2, Lines 5, 17, 19-28		
			Y	Pg 3, Lines 5, 17, 19-28		
			Y	Pg 4, Cols A-H, Lines 1-3, 12, 19		
			Y	Pg 5, Lines 1, 13, 15-24		
			Y	Pg 6, Lines 5, 17, 19-29		
			Y	Pg 7, Cols A-H, Lines 1-3, 12, 19		
			Y	Pg 8, Lines 5, 17, 19-28		
			Y	Pg 9, Lines 5, 17, 19-28		
43-3/4	Settlement Price	4	N			
43-3/5	Platts	22	N			
43-3/6	M&S Corrections & Adjustments	3	Y	Pg 1, Col A	(a), (e)	G. Yupp
				Pgs 2-3, Cols A-E		

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Affiant
43-5	Monthly Gas Closing Report	1	Y	Cols A-D, Lines 1-8	(a), (d), (e)	G. Yupp
43-5/1	Natural Gas Price Computation	2	Y	Pg 1, Col A	(a), (e)	G. Yupp
				Pg 2, Line 4		
43-5/2	Monthly Gas Closing Report	3	Y	Pg 1, Cols A-D	(a), (d), (e)	G. Yupp
				Pg 2, Cols A-B, Lines 1-4		
				Pg 3, Cols A-C		
45-1	Rebalancing	1	Y	Lines 24-25	(a), (e)	G. Yupp
45-2	Rebalancing	1	Y	Cols A-F, Line 2	(a), (d), (e)	G. Yupp
45-2/1	Rebalancing	1	Y	Cols A-H, Lines 1-3	(a), (d), (e)	G. Yupp
45-2/1-1	Rebalancing	1	Y	Cols A-L, Lines 1-5	(a), (d), (e)	G. Yupp
45-2/1-2	PPS	3	Y	Pgs 1-2, ALL	(a), (e)	G. Yupp
				Pg 3, Lines 1-7		
45-2/1-3	PPS	3	Y	Pgs 1-2, ALL	(a), (e)	G. Yupp
				Pg 3, Lines 1-32, 40-41		
45-2/1-4	PPS	4	Y	Pgs 1-3, ALL	(a), (e)	G. Yupp
				Pg 4, Lines 1-7		
45-2/1-5	PPS	4	Y	Pgs 1-3, ALL	(a), (e)	G. Yupp
				Pg 4, Lines 1-7		
45-2/1-6	PPS	3	Y	Pgs 1-2, ALL	(a), (e)	G. Yupp
				Pg 3, Lines 1-7		
45-2/1-7	PPS	3	Y	Pgs 1-2, ALL	(a), (e)	G. Yupp
				Pg 3, Lines 1-24		
45-2/1-8	PPS	3	Y	Pgs 1-2, ALL	(a), (e)	G. Yupp

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Affiant
				Pg 3, Lines 1-43		
45-2/1-9	PPS	3	Y	Pgs 1-2, ALL	(a), (e)	G. Yupp
				Pg 3, Lines 1-42		
45-2/1-10	PPS	3	Y	Pgs 1-2, ALL	(a), (e)	G. Yupp
				Pg 3, Lines 1-7		
45-2/1-11	PPS	4	Y	Pgs 1-3, ALL	(a), (e)	G. Yupp
				Pg 4, Lines 1-29		
45-2/1-12	PPS	4	Y	Pgs 1-3, ALL	(a), (e)	G. Yupp
				Pg 4, Lines 1-29		
45-2/1-13	PPS	3	Y	Pgs 1-2, ALL	(a), (e)	G. Yupp
				Pg 3, Lines 1-7		
45-2/1-14	PPS	3	Y	Pgs 1-2, ALL	(a), (e)	G. Yupp
				Pg 3, Lines 1-43		
45-2/1-15	PPS	3	Y	Pgs 1-2, ALL	(a), (e)	G. Yupp
				Pg 3, Lines 1-37		
45-3	PPS	2	Y	Pg 1, Lines 14-15, 26-27	(a), (e)	G. Yupp
				Pg 2, Lines 13-15		
45-4	Rebalancing	2	Y	Pg 1, Lines 14-15, 17, 34-36	(a), (e)	G. Yupp
				Pg 2, Lines 1-8, 10-11, 13-24, 27-35		
45-4/1	Rebalancing	3	Y	ALL	(a), (e)	G. Yupp
45-4/2	Rebalancing	9	Y	ALL	(a), (e)	G. Yupp
46	VaR	1	Y	Line 8	(a), (e)	G. Yupp

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Affiant
46-1	VaR	21	Y	ALL	(a), (e)	G. Yupp
47	Representation Letter	1	Y	Lines 5, 7-8	(a), (e)	G. Yupp
48	Policies & Guideline Procedures	7	Y	ALL	(a), (e)	G. Yupp
48-1	Policies & Guideline Procedures	40	Y	ALL	(a), (e)	G. Yupp
49	Hedging Contracts	2	N			
49-1	Contract	67	Y	ALL	(a), (d), (e)	G. Yupp
49-2	Contract	70	Y	ALL	(a), (d), (e)	G. Yupp
50	Lehman Settlement	2	Y	Pg 1, Lines 16-36	(d), (e)	G. Yupp
				Pg 2, Lines 1-6		
50-1	Lehman Settlement	2	Y	Pg 1, Cols A-C	(d), (e)	G. Yupp
				Pg 2, Cols A-D		

FIRST REVISED EXHIBIT D

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 130001-EI

STATE OF FLORIDA)

)

AFFIDAVIT OF GERARD J. YUPP

PALM BEACH COUNTY)

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 First Revised Exhibit C, and the documents that are included in Exhibit A to FPL's First Request for Confidential Classification of Materials Provided Pursuant to Audit No. 11-129-4-2. The documents or materials that I have reviewed, and which are asserted by FPL to be proprietary confidential business information, contain or constitute data pertinent to FPL's procurement activities and hedging program. The documents contain or constitute 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 procedure that 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.


3. The documents or materials also contain or constitute information regarding physical and financial details related to FPL's annual hedging program for natural gas and fuel oil. The information contains monthly realized values for FPL's hedge positions and the resulting impact on the cost of natural gas and fuel oil. The disclosure of this information would impair the efforts of FPL to contract for goods and services on favorable terms for the benefit of its customers, and would impair the competitive interests of FPL and its vendors. Disclosure of certain of the information would also place FPL at a competitive disadvantage when coupled with other information that is publicly available.

4. The documents or materials also contain the names of financial counterparties with which FPL executes heavy fuel oil hedging transactions. Due to the extremely limited population of potential counterparties that participate in this market, the disclosure of this data would harm the competitive business of FPL and impair the efforts of the company to contract for hedging instruments on favorable terms. Specifically, the disclosure of the names of certain financial counterparties would reveal transaction frequency and volume between FPL and those financial counterparties. This would harm FPL's efforts to contract with those financial counterparties on favorable terms in the future, to the detriment of FPL and its customers.

5. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

6. Nothing has occurred since the issuance of Order No. PSC-12-0109-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of at least an additional eighteen (18) months. 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.

7. Affiant says nothing further.



Gerard J. Yupp

SWORN TO AND SUBSCRIBED before me this 26th 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:



FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 130001-EI

STATE OF FLORIDA)
)
COUNTY OF MIAMI-DADE)

AFFIDAVIT OF ANTONIO MACEO


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

1. My name is Antonio Maceo. I am currently employed by Florida Power & Light Company ("FPL") as Manager, Internal Auditing. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed First Revised Exhibit C, and the documents that are included in Exhibit A to FPL's First Request for Confidential Classification of Information Obtained in Connection with Audit No. 11-129-4-2, for which I am identified on Exhibit C as the affiant. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, contain or constitute internal auditing controls and reports of internal auditors or information relating to internal auditing reports issued in 2010. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

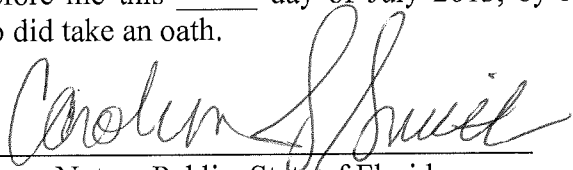
3. Nothing has occurred since the issuance of Order No. PSC-12-0109-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of at least an additional eighteen (18) months. 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.



Antonio Maceo

SWORN TO AND SUBSCRIBED before me this 25th day of July 2013, by Antonio Maceo, who is personally known to me and who did take an oath.



Notary Public, State of Florida

My Commission Expires:



FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 130001-EI

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

AFFIDAVIT OF SOLOMON L. STAMM

BEFORE ME, the undersigned authority, personally appeared Solomon L. Stamm who, being first duly sworn, deposes and says:

1. My name is Solomon L. Stamm. I am currently employed by Florida Power & Light Company ("FPL") as Director of Regulatory Accounting. I have personal knowledge of the matters stated in this affidavit.

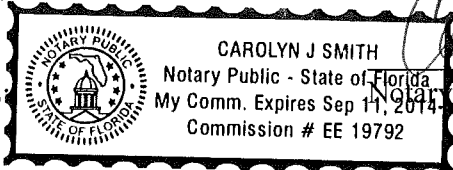
2. I have reviewed First Revised Exhibit C, and the documents that are included in Exhibit A to FPL's First Request for Confidential Classification of Information Obtained in Connection with Audit No. 11-129-4-2, for which I am identified on Exhibit C as the affiant. Such documents or materials that I have reviewed and which are asserted by FPL to be proprietary and confidential business information, contain or constitute auditing controls and reports of external auditors or information relating to same, which the external auditors consider to be proprietary and confidential. The documents or materials also contain information concerning bids or contractual data, the disclosure of which would impair FPL's efforts to contract for goods and services on favorable terms. Specifically, the information provided by FPL includes oil financial instruments, fuel status and inventory reports, contractual data, and negotiated agreements for services of FPL facilities. This information, if made public, would disclose certain competitively sensitive procedures to the detriment of FPL and its customers, and would impair FPL's efforts to enter into contracts on commercially favorable terms. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-12-0109-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of at least an additional eighteen (18) months. 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.

[Signature]
Solomon L. Stamm

SWORN TO AND SUBSCRIBED before me this 25th day of July 2013, by Solomon L. Stamm, who is personally known to me and who did take an oath.

My Commission Expires:  *[Signature]* Notary Public, State of Florida