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August 14, 2015

VIA HAND DELIVERY

REDACTED

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

RECEIVED - FPSC
15 AUG 14 PM 2:09
COMMISSION
CLERK

Re: Docket No. 150001-EI

Dear Ms. Stauffer:

I am enclosing for filing in the above docket the original and seven (7) copies of FPL's Request for Confidential Classification of Certain Information Contained in Hedging Activity Report (Exhibit GJY-4). The original includes Exhibits A through D. The seven (7) copies do not include exhibits.

Exhibit A contains the confidential information that is the subject of FPL's Request for Confidential Classification. Exhibit A is submitted for filing separately and marked "EXHIBIT A" - CONFIDENTIAL. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C contains FPL's justification for its Request for Confidential Classification. Exhibit D contains the Affidavit of Gerard J. Yupp in support of FPL's Request for Confidential Classification. In accordance with Rule 25.22.006(3)(d), FPL requests confidential treatment of the information in Exhibit A pending disposition of FPL's request for Confidential Classification.

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

If there are any questions regarding this transmittal, please contact me at 561-304-5795

Sincerely,

Maria J. Moncada

Enclosures
cc: parties of record, w/o exhibits

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AFD	2 + CD 2 + Redacted
APA	_____
ECO	1
ENG	2
GCL	1
IDM	1
TEL	_____
CLK	_____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 150001-EI
Filed: August 14, 2015

**FLORIDA POWER AND LIGHT COMPANY'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF CERTAIN INFORMATION
CONTAINED IN THE FUEL HEDGING ACTIVITY REPORT (EXHIBIT GJY-4)**

Florida Power & Light Company ("FPL"), pursuant to Rule 25-22.006, F.A.C., and Section 366.093, Florida Statutes, requests confidential classification of certain information contained in FPL's Fuel Hedging Activity Report. In support of its Request, FPL states as follows:

1. Pursuant to Order No. PSC-08-0316-PAA-EI, issued on May 14, 2008, FPL filed its Fuel Hedging Activity Report on August 14, 2015, which will be adopted as exhibit GJY-4 in the testimony of FPL witness Gerry J. Yupp in FPL's 2016 Fuel and Capacity Projection Filing in this docket. FPL's Fuel Hedging Activity Report contains FPL proprietary confidential business information regarding market comparisons and hedging activities. This request is intended to request confidential classification of information contained in the Fuel Hedging Activity Report.

2. The following exhibits are included with this Request:

a. Exhibit A is a copy of the Fuel Hedging Activity Report, in which the confidential information has been highlighted.

b. Exhibit B consists of two copies of the Fuel Hedging Activity Report in which the confidential information has been redacted.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A, together with references to the specific statutory bases for the claim of confidentiality and to the affidavit in support of the requested confidential classification.

d. Exhibit D consists of the affidavit of Gerard J. Yupp, Senior Director of Wholesale Operations for FPL's Energy Marketing and Trading Division in support of this Request for Confidential Classification.

3. FPL submits that the highlighted information in Exhibit A is proprietary 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 it 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. FPL's Fuel Hedging Activity Report contains or constitutes data pertinent to FPL's fuel hedging program. Specifically, the Hedging Activity Report provides the physical and financial details related to FPL's year-to-date hedging results for natural gas. Additionally, as required by Order No. PSC-15-0284-FOF-EI, the Hedging Activity Report contains separate pages that provide a detailed comparison of gas reserve projects entered into on behalf of FPL or its affiliate (pursuant to gas reserves guideline II.A) and the results for gas reserve projects entered and/or held by any affiliate or subsidiary of NextEra Energy, Inc. (pursuant to gas reserves guideline II.B).

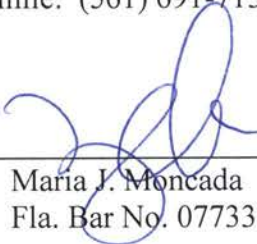
5. The information contained in the Hedging Activity Report, if disclosed would impair the efforts of FPL to contract for goods and services on favorable terms for the benefit of its customers, would impair the competitive interests of FPL and its vendors, and would place FPL at a competitive disadvantage when coupled with other information that is publicly available. This information is protected by Sections 366.093(3)(d) and (e), F.S.

6. Upon a finding by the Commission that the Fuel Hedging Activity Report in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), F.S., pursuant to Section 366.093(4), 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.

WHEREFORE, FPL respectfully requests confidential classification of the Fuel Hedging Activity Report.

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

By: _____



Maria J. Moncada
Fla. Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 150001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic mail on this 14th day of August, 2015 to the following:

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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.

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EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1						
2						
3						
4	YEAR-TO-DATE	GAS RESERVES				
5	(JAN - JULY) 2015	SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
8						\$ (259,491,945)
9						
10						
11	AVERAGE PERIOD OF HEDGE (Years) - GAS RESERVES					
12	AVERAGE PERIOD OF HEDGE (Days) - FINANCIAL					

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1						
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4	January-2015	GAS RESERVES				
5		SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
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A	B	C	D	E	F
FPL NATURAL GAS PROCUREMENT					
VOLUME (MMBTU)					
<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
February-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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		FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
March-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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A	B	C	D	E	F
		FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
<u>PERIOD</u>	<u>INSTRUMENT</u>	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
April-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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A	B	C	D	E	F
		FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
May-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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A	B	C	D	E	F
		FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
June-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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A	B	C	D	E	F
		FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
July-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

**Results of FPL's Economic Evaluation
PetroQuest⁽¹⁾**

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	A	B	C	D	E	F = C + D + E	G = F / B	H	I = B x (H-G)	J	K = I x J	
	Period	Year	Annual Production (Bcf)	Operating Expenses (\$MM)	Depreciation (\$MM)	Return Rate ⁽³⁾ (\$MM)	Revenue Requirement (\$MM)	Effective Cost (\$/MMBtu)	FPL Market Price Forecast (\$/MMBtu) ⁽⁴⁾	Undiscounted Customer Savings (\$MM)	FPL Discount Factor	Discounted Customer Savings (\$MM)
5	1	2015	7.3					\$3.56	\$2.72	(\$6.2)	0.93	(\$5.8)
6	2	2016	19.9					\$2.91	\$3.00	\$1.9	0.87	\$1.7
7	3	2017	12.6					\$3.17	\$3.23	\$0.8	0.80	\$0.7
8	4	2018	9.6					\$3.41	\$3.74	\$3.2	0.75	\$2.4
9	5	2019	7.8					\$3.80	\$3.96	\$1.2	0.70	\$0.8
10	6	2020	6.6					\$4.18	\$4.93	\$4.9	0.65	\$3.2
11	7	2021	5.8					\$4.36	\$5.32	\$5.5	0.60	\$3.3
12	8	2022	5.2					\$4.52	\$5.61	\$5.7	0.56	\$3.2
13	9	2023	4.7					\$4.64	\$5.85	\$5.7	0.52	\$3.0
14	10	2024	4.3					\$4.75	\$6.03	\$5.5	0.48	\$2.7
15	11	2025	4.0					\$4.65	\$6.22	\$6.2	0.45	\$2.8
16	12	2026	3.7					\$4.72	\$6.41	\$6.3	0.42	\$2.6
17	13	2027	3.5					\$4.78	\$6.60	\$6.3	0.39	\$2.5
18	14	2028	3.3					\$4.84	\$6.81	\$6.4	0.36	\$2.3
19	15	2029	3.1					\$4.90	\$7.01	\$6.5	0.34	\$2.2
20	16	2030	2.9					\$4.96	\$7.23	\$6.5	0.31	\$2.0
21	17	2031	2.7					\$5.03	\$7.44	\$6.5	0.29	\$1.9
22	18	2032	2.5					\$5.10	\$7.67	\$6.6	0.27	\$1.8
23	19	2033	2.4					\$5.17	\$7.90	\$6.5	0.25	\$1.6
24	20	2034	2.2					\$5.25	\$8.06	\$6.3	0.23	\$1.5
25	21	2035	2.1					\$5.32	\$8.22	\$6.1	0.22	\$1.3
26	22	2036	2.0					\$5.40	\$8.42	\$6.0	0.20	\$1.2
27		2037-65	25.7					\$7.09	\$11.06	\$102.0	0.10	\$10.2
28		Totals⁽²⁾	143.9	\$308.7	\$169.9	\$178.7	\$657.3			\$206.6		\$49.2

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Notes:

- (1) Includes actuals through July 2015 and current estimates there after
- (2) Totals are for 2015-2065, an assumed 50 year project life. Totals may not add due to rounding.
- (3) Return rate includes return on the assets and return of financing costs.
- (4) Utilizes FPL's July long-range forecast

Results of FPL's Economic Evaluation (US Gas Assets Transaction)

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A		B	C	D	E	F = C + D + E	G = F / B	H	I = B x (H-G)	J	K = I x J
Period	Year	Annual Production (Bcf)	Operating Expenses (\$MM)	Depreciation (\$MM)	Return Rate ⁽²⁾ (\$MM)	Revenue Requirement (\$MM)	Effective Cost (\$/MMBtu)	FPL Market Price Forecast ⁽³⁾ (\$/MMBtu)	Undiscounted Customer Savings(3) (\$MM)	FPL Discount Factor	Discounted Customer Savings (\$MM)
5	1	2015	0.4				\$2.30	\$2.96	\$0.3	0.97	\$0.3
6	2	2016	4.3				\$2.54	\$3.13	\$2.5	0.90	\$2.3
7	3	2017	3.2				\$2.96	\$3.33	\$1.2	0.84	\$1.0
8	4	2018	2.3				\$3.28	\$3.82	\$1.2	0.78	\$1.0
9	5	2019	1.8				\$3.56	\$4.02	\$0.8	0.73	\$0.6
10	6	2020	1.5				\$3.81	\$5.00	\$1.7	0.68	\$1.2
11	7	2021	1.2				\$4.00	\$5.39	\$1.7	0.63	\$1.1
12	8	2022	1.1				\$4.16	\$5.69	\$1.7	0.58	\$1.0
13	9	2023	1.0				\$4.31	\$5.92	\$1.6	0.54	\$0.9
14	10	2024	0.9				\$4.45	\$6.11	\$1.5	0.51	\$0.7
15	11	2025	0.8				\$4.59	\$6.29	\$1.4	0.47	\$0.6
16	12	2026	0.7				\$4.72	\$6.48	\$1.3	0.44	\$0.6
17	13	2027	0.7				\$4.85	\$6.68	\$1.3	0.41	\$0.5
18	14	2028	0.7				\$4.97	\$6.88	\$1.3	0.38	\$0.5
19	15	2029	0.6				\$5.09	\$7.09	\$1.2	0.35	\$0.4
20	16	2030	0.6				\$5.20	\$7.30	\$1.2	0.33	\$0.4
21	17	2031	0.5				\$5.31	\$7.52	\$1.2	0.30	\$0.4
22	18	2032	0.5				\$5.42	\$7.74	\$1.2	0.28	\$0.3
23	19	2033	0.5				\$5.54	\$7.97	\$1.2	0.26	\$0.3
24	20	2034	0.5				\$5.66	\$8.13	\$1.2	0.25	\$0.3
25	21	2035	0.4				\$5.78	\$8.30	\$1.1	0.23	\$0.3
26	22	2036	0.4				\$5.91	\$8.50	\$1.1	0.21	\$0.2
27		2037-65	6.1				\$8.87	\$11.29	\$14.9	0.12	\$1.8
28		Totals⁽¹⁾	30.7	\$85.3	\$33.9	\$29.7	\$149.0		\$43.8		\$16.6

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Notes:

- (1) Totals are for 2015-2065, an assumed 50 year project life. Totals may not add due to rounding.
- (2) Return rate includes return on the assets and return of financing costs.
- (3) Utilizes FPL's July long-range forecast

Project Specific Assumptions



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Pricing and Production Sensitivities

CPVRR (\$MM)	Low Fuel	Base Fuel	High Fuel
Low Production	(\$2.9)	\$10.7	\$24.4
Base Production	\$1.4	\$16.6	\$31.7
High Production	\$5.7	\$22.4	\$39.0

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 150001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause
SUBJECT: Fuel Hedging Activity Report
DATE: August 14, 2015

Description	Page No.	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Affiant
Year to Date FPL Natural Gas Procurement Jan-July 2015	1	Cols C-D, Lns 4-8, 11-12 Col E, Lns 4-8 Col F, Lns 4-7	(d), (e)	G. J. Yupp
January 2015 FPL Natural Gas Procurement	2	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
February 2015 FPL Natural Gas Procurement	3	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
March 2015 FPL Natural Gas Procurement	4	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
April 2015 FPL Natural Gas Procurement	5	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
May 2015 FPL Natural Gas Procurement	6	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
June 2015 FPL Natural Gas Procurement	7	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
July 2015 FPL Natural Gas Procurement	8	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
Results of FPL's Economic Evaluation PetroQuest Detailed comparison of all gas reserve projects entered into on behalf of FPL or its affiliate (Guideline II.A.)	9	Cols C-F, Lns 6-28	(d), (e)	G. J. Yupp
Results of FPL's Economic Evaluation (US Gas Assets Transaction) Results (gains or losses) for gas reserve projects entered and/or held by any affiliate or subsidiary of NextEra Energy (Guideline II.B.)	10	Line 2 Cols C-F, Lns 6-28 Lines 37-45	(d), (e)	G. J. Yupp

EXHIBIT D

AFFIDAVIT

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 150001-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT OF GERARD J. YUPP

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

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

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification of the Fuel Hedging Activity Report. The documents and 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 hedging program. Specifically, the documents contain information regarding the physical and financial details related to FPL's year-to-date hedging results for natural gas. Additionally, the Hedging Activity Report contains separate pages that provide a detailed comparison of gas reserve projects entered into on behalf of FPL or its affiliate, as well as the results for gas reserve projects entered and/or held by any affiliate or subsidiary of NextEra Energy, Inc ("NEE"). This information, if disclosed, would impair the efforts of FPL to contract for goods and services on favorable terms for the benefit of its customers. Further, disclosure would impair the competitive interests of FPL, NEE or their affiliates or vendors, and would place FPL, NEE or their affiliates at a competitive disadvantage when coupled with other information that is publicly available.

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.

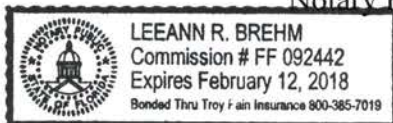
4. Affiant says nothing further.

Handwritten signature of Gerard J. Yupp over a horizontal line, with the printed name Gerard J. Yupp below it.

SWORN TO AND SUBSCRIBED before me this 13 day of August 2015, 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.

Handwritten signature of the Notary Public over a horizontal line, with the printed title Notary Public, State of Florida below it.

My Commission Expires:



:2789299