



Maria J. Moncada
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
561-304-5795
(561) 691-7135 (Facsimile)
E-mail: maria.moncada@fpl.com

October 7, 2015

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

RECEIVED FPSC
15 OCT -7 PM 1:35
COMMISSION
CLERK

REDACTED

Re: Docket No. 150001-EI

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's Request for Confidential Classification of Materials Provided Pursuant to Audit No. 15-051-4-1. 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 affidavits in support of FPL's Request for Confidential Classification.

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)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 150001-EI
Date: October 7, 2015

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 15-051-4-1**

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 material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 15-051-4-1 ("the Audit"). In support of this request, FPL states as follows:

1. During the Audit, FPL provided Staff with various confidential documents. By letter dated September 14, 2015, Staff indicated its intent to retain certain audit work papers. Pursuant to Rule 25-22.006(3)(a), FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the work papers. Accordingly, FPL files this Request for Confidential Classification to maintain continued confidential handling of the confidential work papers.

2. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy the confidential documents, on which all information that is entitled to confidential treatment under Florida law has been highlighted.

b. Exhibit B consists of a copy of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted. For the documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B.

c. Exhibit C is a table that identifies the specific line, field or page references to the confidential materials for which FPL seeks confidential treatment. The table also references the specific statutory bases for confidentiality and the affiants who support the requested classification.

d. Exhibit D consists of the affidavits of Antonio Maceo and Gerard J. Yupp.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3). This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. As further detailed in the affidavits included in Exhibit D indicate, certain documents provided by FPL contain information concerning internal auditing controls and reports of internal auditors. This information is protected by Section 366.093(3)(b), Fla. Stat.

5. Additionally, certain documents contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Also, certain information in these documents and materials concern the competitive interests of FPL or third parties, the disclosure of which would impair the competitive business of FPL and the third parties. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, 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 the information 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,

John T. Butler
Assistant General Counsel - Regulatory
Maria J. Moncada
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135
Email: maria.moncada@fpl.com

By: _____


Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE

Docket No. 150001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification* has been furnished by electronic service this 7th day of October, 2015 to the following:

Suzanne Brownless, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us

Andrew Maurey
Michael Barrett
Division of Accounting and Finance
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
mbarrett@psc.state.fl.us
amaurey@psc.state.fl.us

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

Dianne M. Triplett, Esq.
Attorneys for Duke Energy Florida
299 First Avenue North
St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com

James D. Beasley, Esq.
J. Jeffrey Wahlen, Esq.
Ashley M. Daniels, Esq.
Ausley & McMullen
Attorneys for Tampa Electric Company
P.O. Box 391
Tallahassee, Florida 32302
jbeasley@ausley.com
jwahlen@ausley.com
adaniels@ausley.com

Jeffrey A. Stone, Esq.
Russell A. Badders, Esq.
Steven R. Griffin, Esq.
Beggs & Lane
Attorneys for Gulf Power Company
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

James W. Brew, Esq.
Owen J. Kopon, Esq.
Laura A. Wynn, Esq.
Attorneys for PCS Phosphate - White Springs
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201
jbrew@smxblaw.com
ojk@smxblaw.com
laura.wynn@smxblaw.com

Robert L. McGee, Jr.
Gulf Power Company
One Energy Place
Pensacola, Florida 32520
rlmcgee@southernco.com

Matthew R. Bernier, Esq.
Duke Energy Florida
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
matthew.bernier@duke-energy.com

Erik L. Sayler, Esq.
John J. Truitt, Esq.
J. R. Kelly, Esq.
Patricia Christensen, Esq.
Charles Rehwinkel, 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
sayler.erik@leg.state.fl.us
truitt.john@leg.state.fl.us

Cheryl Martin, Director – Regulatory Affairs
Florida Public Utilities Company
911 South 8th Street
Fernandina Beach, Florida 32034
cheryl_martin@fpuc.com

Paula K. Brown, Manager
Tampa Electric Company
Regulatory Coordinator
Post Office Box 111
Tampa, Florida 33601-0111
regdept@tecoenergy.com

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

By: _____



Maria J. Moncada

* 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

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2/1/15

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A	B	C	D	E	F
FPL NATURAL GAS PROCUREMENT					
VOLUME (MMBTU)					
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
August-2014	FIXED PRICE TRANSACTIONS				
	SWAPS				
	SWING SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

43-1

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title FILUG

PBC
CONFIDENTIAL

SOURCE DL #4

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9/21/14

Florida Power & Light Company
Hedging Activities
DK# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title FILING

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FPL NATURAL GAS PROCUREMENT					
VOLUME (MMBTU)					
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
September-2014	FIXED PRICE TRANSACTIONS				
	SWAPS				
	SWING SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				



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SOURCE DL # 4

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FPL NATURAL GAS PROCUREMENT					
VOLUME (MMBTU)					
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
October-2014	FIXED PRICE TRANSACTIONS				
	SWAPS				
	SWING SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				



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Florida Power & Light Company
 Hedging Activities
 Dkt# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

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CONFIDENTIAL HEDGING REQUEST NO.4

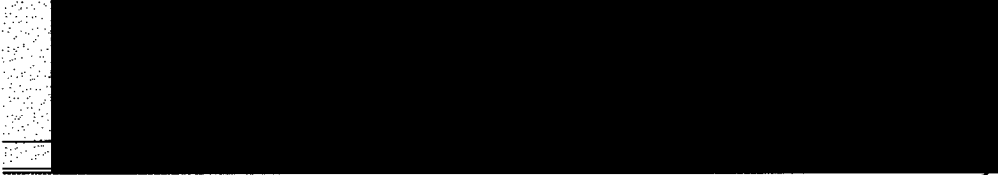
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FPL NATURAL GAS PROCUREMENT					
VOLUME (MMBTU)					
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
November-2014	FIXED PRICE TRANSACTIONS				
	SWAPS				
	SWING SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				



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Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

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FPL NATURAL GAS PROCUREMENT					
VOLUME (MMBTU)					
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
December-2014	FIXED PRICE TRANSACTIONS				
	SWAPS				
	SWING SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				



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Florida Power & Light Company
Hedging Activities
DK# 150001-EI, ACN 15-051-4-1
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Title FILING

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CONFIDENTIAL HEDGING REQUEST NO.4

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PERIOD	INSTRUMENT	VOLUME (MMBTU)		OPTION PREMIUMS	SAVINGS/(COSTS)
		PURCHASES	SALES		
January-2015	GAS RESERVES SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			

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Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

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FPL NATURAL GAS PROCUREMENT					
PERIOD	INSTRUMENT	VOLUME (MMBTU)		OPTION PREMIUMS	SAVINGS/(COSTS)
		PURCHASES	SALES		
February-2015	GAS RESERVES SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			

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Florida Power & Light Company
Hedging Activities
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PERIOD	INSTRUMENT	FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
		PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
March-2015	GAS RESERVES SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			

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Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
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Florida Power & Light Company
Hedging Activities
DK# 150001-EI, ACN 15-051-4-1
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FPL NATURAL GAS PROCUREMENT					
VOLUME (MMBTU)					
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
April-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				



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VOLUME (MMBTU)					
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
May-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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Florida Power & Light Company
Hedging Activities
DK# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title FILING

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PERIOD	INSTRUMENT	FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
		PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
June-2015	GAS RESERVES	[REDACTED]			46-1 Pa ✓
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
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Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

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PERIOD	INSTRUMENT	FPL NATURAL GAS PROCUREMENT			
July-2015		VOLUME (MMBTU)			
		PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
	GAS RESERVES	[REDACTED]			
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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SOURCE DR 10

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	A	B	FPL NATURAL GAS PROCUREMENT				F
			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						(3-1)	
11	AVERAGE PERIOD OF HEDGE (Years) - GAS RESERVES		50		0		
12	AVERAGE PERIOD OF HEDGE (Days) - FINANCIAL		293		0		

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title FILINGS

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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) Undiscounted	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)	Customer Savings(3) (\$MM)	FPL Discount Factor	Discounted Customer Savings (\$MM)
1	2015	0.4					\$2.30	\$2.95	\$0.3	0.97	\$0.3
2	2016	4.3					\$2.54	\$3.13	\$2.5	0.90	\$2.3
3	2017	3.2					\$2.96	\$3.33	\$1.2	0.84	\$1.0
4	2018	2.3					\$3.28	\$3.82	\$1.2	0.78	\$1.0
5	2019	1.8					\$3.56	\$4.02	\$0.8	0.73	\$0.6
6	2020	1.5					\$3.81	\$5.00	\$1.7	0.68	\$1.2
7	2021	1.2					\$4.00	\$5.39	\$1.7	0.63	\$1.1
8	2022	1.1					\$4.16	\$5.69	\$1.7	0.58	\$1.0
9	2023	1.0					\$4.31	\$5.92	\$1.6	0.54	\$0.9
10	2024	0.9					\$4.45	\$6.11	\$1.5	0.51	\$0.7
11	2025	0.8					\$4.59	\$6.29	\$1.4	0.47	\$0.6
12	2026	0.7					\$4.72	\$6.48	\$1.3	0.44	\$0.6
13	2027	0.7					\$4.85	\$6.68	\$1.3	0.41	\$0.5
14	2028	0.7					\$4.97	\$6.88	\$1.3	0.38	\$0.5
15	2029	0.6					\$5.09	\$7.09	\$1.2	0.35	\$0.4
16	2030	0.6					\$5.20	\$7.30	\$1.2	0.33	\$0.4
17	2031	0.5					\$5.31	\$7.52	\$1.2	0.30	\$0.4
18	2032	0.5					\$5.42	\$7.74	\$1.2	0.28	\$0.3
19	2033	0.5					\$5.54	\$7.97	\$1.2	0.26	\$0.3
20	2034	0.5					\$5.66	\$8.13	\$1.2	0.25	\$0.3
21	2035	0.4					\$5.78	\$8.30	\$1.1	0.23	\$0.3
22	2036	0.4					\$5.91	\$8.50	\$1.1	0.21	\$0.2
23	2037-65	6.1					\$8.87	\$11.29	\$14.9	0.12	\$1.8
Totals ⁽¹⁾		30.7	\$85.3	\$33.9	\$29.7	\$149.0			\$43.8		\$16.6

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



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

Florida Power & Light Company
 Hedging Activities
 Dkt# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15
 Title: Filing

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PBC

CPVRR (\$MM)

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CONFIDENTIAL

Title LIST OF INTERNAL

AUDIT REPORTS AUDITS

Hedging Request No. 2

January 2014 to date (6/18/15)

9/15/14
9/15/14

- 1. [REDACTED]^A AND BILLING 1/7/14
- 2. [REDACTED]^A REVIEW 2/4/14
- 3. [REDACTED]^A REVIEW FOR THE YEAR
ENDING 12/21/13 2/5/14
- 4. SOX 8.43.03 - [REDACTED]^A PAYMENTS - FPL 2/11/14
- 5. SOX 07.03.01 [REDACTED]^A 2/11/14
- 6. SOX 07.05.01 [REDACTED]^A 2/11/14
- 7. SOX 07.06.01 [REDACTED]^A 2/11/14
- 8. REVIEW OF [REDACTED]^A FOLLOW-UP 2/13/14
- 9. EXTENDED POWER UPRATE (EPU) REVIEW: 2013 EXPENDITURES 2/21/14
- 10. [REDACTED]^A AUDIT - 2014 2/24/14
- 11. PGD [REDACTED]^A 3/5/14
- 12. FOLLOW-UP OF [REDACTED]^A 3/6/14
- 13. [REDACTED]^A REVIEW 3/17/14
- 14. FPL [REDACTED]^A AUDIT 3/31/14
- 15. REVIEW OF [REDACTED]^A 4/4/14
- 16. [REDACTED]^A REVIEW 4/10/14
- 17. NEW NUCLEAR REVIEW: 2013 EXPENDITURES 4/17/14
- 18. [REDACTED]^A PROCESS REVIEW 4/22/14
- 19. [REDACTED] 4/28/14
- 20. REVIEW OF FPL [REDACTED]^A
[REDACTED]^B 5/6/14

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9/7/15

PSC REQUEST NO. 2 (CONT...)
PAGE TWO OF FOUR

Title LIST OF INTERNAL AUDITS

- 21. POWER DELIVERY [REDACTED] ^A 5/14/14
- 22. REVIEW OF [REDACTED] ^A PROCESS 5/28/14
- 23. FPL [REDACTED] ^A AUDIT 6/2/14
- 24. [REDACTED] ^A PROCESS REVIEW 6/6/14
- 25. [REDACTED] ^A BUSINESS PROCESS AUDIT 6/12/14
- 26. [REDACTED] ^A NON-SOX PROCESS AUDIT 6/18/14
- 27. DISTRIBUTION [REDACTED] ^A
ADMINISTRATION REVIEW 6/23/14
- 28. [REDACTED] 6/25/14
- 29. [REDACTED] ^A REVIEW 6/26/14
- 30. [REDACTED] ^A CONSULT 6/26/14
- 31. [REDACTED] 6/30/14
- 32. [REDACTED] 7/7/14
- 33. [REDACTED] ^A PROJECT-CONSULTATION 7/28/14
- 34. REVIEW OF [REDACTED] ^A AUDITS 8/1/14
- 35. [REDACTED] ^A FOLLOW-UP AUDIT 8/25/14
- 36. [REDACTED] ^A DISTRIBUTION SERVICE CENTER 8/28/14
- 37. REVIEW OF [REDACTED] ^A PROCESS CONSULT 8/29/14
- 38. [REDACTED] ^A PROJECT CONSULTATION 9/8/14
- 39. REVIEW OF [REDACTED] ^A 9/15/14
- 40. [REDACTED] ^A IMPLEMENTATION CONSULT 9/18/14
- 41. [REDACTED] 9/24/14

(N)

(N)

(N)

9 02

CONFIDENTIAL

PSC REQUEST NO. 2 (CONT...)
PAGE THREE OF FOUR

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

9/15/17
9/15/17

Title LIST OF INTERNAL
AUDITS

- 42. [REDACTED]^A AUDIT 9/29/14
- 43. DISTRIBUTION [REDACTED]^A
[REDACTED]^B PROCESS REVIEW 10/3/14
- 44. [REDACTED]^A REVIEW 10/16/14
- 45. [REDACTED]^A PROCESS REVIEW 10/22/14
- 46. [REDACTED]^A REVIEW 11/3/14
- 47. IT SYSTEM [REDACTED]^A 11/3/14
- 48. [REDACTED]^A REVIEW FOLLOW-UP 11/3/14
- 49. [REDACTED]^A AUDIT 12/1/14
- 50. [REDACTED]^A AUDIT 12/2/14
- 51. IT SYSTEM [REDACTED]^A 12/3/14
- 52. NUCLEAR [REDACTED]^A AUDIT 12/4/14
- 53. REVIEW OF [REDACTED]^A CONTROLS 12/5/14
- 54. [REDACTED]^A FOLLOW-UP REVIEW 12/8/14
- 55. [REDACTED]^A TEAM PARTICIPATION 12/11/14
- 56. [REDACTED]^A TRANSACTION AUDIT 12/15/14
- 57. [REDACTED]^A AUDIT 2014 12/17/14
- 58. [REDACTED]^A REVIEW 12/19/14
- 59. [REDACTED]^A REVIEW 12/19/14
- 60. [REDACTED]^A POLICY AUDIT 12/22/14

2

SOURCE DR #2

9/15/17

*also
DL
7/15*

Title LIST OF INTERNAL
2015 REPORTS ISSUED AUDITS

1. [REDACTED]^A REVIEW FOR YEAR ENDING 2/6/15
DECEMBER 31, 2014
2. REVIEW OF [REDACTED]^A PROCESS 3/26/15
3. NEW NUCLEAR REVIEW: 2014 EXPENDITURES 3/27/15
4. [REDACTED]^A ADMIN 2016 3/30/15
5. REVIEW OF PD [REDACTED]^A 3/30/15
6. [REDACTED]^A REVIEW 3/30/15
7. REVIEW OF [REDACTED]^A
[REDACTED]^B FUNCTION 3/30/15
8. [REDACTED]^A MANAGEMENT REVIEW - CONSULTATION 4/13/15
9. [REDACTED]^A ADMIN REVIEW 4/21/15
10. [REDACTED]^A PROGRAM 4/24/15
CONSULTATION REVIEW
11. [REDACTED]^A TRANSACTIONS FOLLOW-UP 5/7/15
12. [REDACTED]^A VENDOR AUDIT 5/15/15
13. [REDACTED] 5/18/15
14. [REDACTED]^A DISBURSEMENTS 5/29/15
15. [REDACTED]^A SERVICE CENTER ADMINISTRATIVE REVIEW 5/29/15
16. [REDACTED] 6/4/15
BUSINESS UNITS
17. [REDACTED] 6/18/15
PROJECT MANAGEMENT

SOURCE DR #2

*(N) Reviewed in the
last Fuel Clause
Dkt 150001-EI*

9 PV

Title FPL 2015 RISK MANAG. PLAN

JL
7/15
9/1/15

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

2015 Hedging Strategy (TFB-4, Items 2 and 8)

FPL plans to hedge a portion of its projected 2016 natural gas requirements during 2015. Absent special circumstances (e.g. a hurricane that FPL concludes will substantially impair market functions); FPL will implement its hedging program within the following parameters:

Natural Gas

- 1) FPL will hedge approximately [redacted]^A of its projected 2016 natural gas requirements within the Hedging Window during 2015. This hedge percentage is consistent with 2015 hedge levels and is within FPL's system base load requirements. FPL will hedge approximately [redacted]^A of each individual month's projected natural gas requirements.
- 2) FPL will utilize [redacted]^A to hedge its projected natural gas requirements.
- 3) Should FPL enter into any joint venture transactions for natural gas reserves and these transactions are approved by the FPSC, the expected natural gas production from these transactions will be included as hedged volumes.
- 4) FPL will execute its natural gas hedges for 2016 from [redacted]^A through [redacted]^A as shown below:

2015 →	Hedging Window
[redacted]	

During each month of the Hedging Window, FPL will hedge the percentages shown of its projected 2016 natural gas requirements. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.

- 5) FPL intends to rebalance its natural gas hedge positions during the year based on changes in forecasted market prices, projected unit outage schedules or

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Title 2015 RISK MANAGEM. PLAN

yy
7/15 9/1/14

WP-45-1P7X

changes in FPL's load forecast. Once the initial monthly target volumes have been hedged, rebalancing will be executed to maintain the hedge percentages inside approved tolerance bands. The monthly tolerance bands for natural gas are [redacted]^A. Therefore, the minimum and maximum monthly hedge percentages are [redacted]^A and [redacted]^B respectively.

45-1P1

Heavy Fuel Oil

FPL does not intend to hedge heavy fuel oil for 2016. FPL discontinued fuel oil hedging in 2013 and the factors that influenced that decision still remain.

Reporting System for Fuel Procurement Activities (TFB-4, Items 13 and 14)

FPL reporting systems comprehensively identify, measure, and monitor all forms of risk associated with fuel procurement activities.

FPL's philosophy on reporting is that it should be timely, consistent, flexible, and transparent. Timely and consistent reporting of risk information is critical to the effective management of risk. The utility has sufficient systems capability for identifying, measuring, and monitoring all types of risk associated with fuel procurement activities. These systems include: deal capture, current and historical pricing database, deal information, valuation models, and a reporting system that utilizes the information in the trade capture system and the database.

Specifically, several reports are available at FPL to monitor risk:

Daily Management Report

For each business day there is a formal report produced in hard copy or electronically, for distribution to business and desk heads and members of the EMC. This report details the current energy, spot and forward, unrealized profit and loss, VaR, and position amounts. This report is published only after proper and thorough discussion between Risk Management and desk heads, if necessary for clarification, and resolution of any issues raised.

Credit Exposure Reporting

For each business day there is a formal report produced in hard copy or electronically, for distribution to business and desk heads and members of the EMC. This report details:

- Allowable deal types by counterparty
- Restrictions on counterparties

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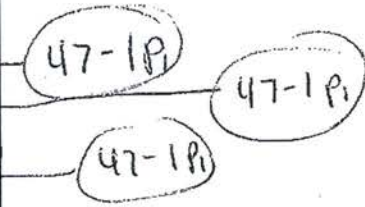
1 [REDACTED]

2 CONFIDENTIAL A

[REDACTED]

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title EMT PROC. MANUAL



3 [REDACTED]

4 [REDACTED]

B

[REDACTED]

5 [REDACTED]

6

7 [REDACTED]

Judey Traders shows on the confirmation notices, not the confirmation personnel.
 (X) Traced to Confirmation Notices provided in DR #16

The EMT Trading and Risk Management Procedures Manual was reviewed for our testing, and returned to the Utility. No change from previous year.

SOURCE DRS, item 2

42-3 P.

1 PBC

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Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title EXIT PROC. MANUAL

Index

X traced to Board of Directors
Notes per last audit Docket 140001-EI.

(N) Traced to Confirmation
Notices provided in DR #16

PBC

Hedging Audit 2015 -- Docket No. 15000*
Audit Request No. 8

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

9/15/14 9/7/15

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Title Sarbanes Oxley Compliance

Q: Please provide:

- 1) Sarbanes Oxley 404 Compliance -- Process Narrative
- 2) A statement explaining how the compliance with the separation of duties (front, middle and back office) is met.

A:

1) The process narratives associated with hedging activities have been included as part of this response

2) FPL incorporates proper separation of duties into all of its hedging activities. Separation of duties is specifically addressed in the NextEra Energy, Inc. Energy Trading and Risk Management Policy. It states: [REDACTED] A

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In addition, the Trading and Risk Management Procedures Manual provides additional detail, description, and explanation for the various activities outlined in the Policy. Compliance requirements, both individual and supervisory, are addressed within the Policy and Procedures documents. The Policy and Procedures manuals were provided in response to Hedging Audit Request No. 5. OP42-1X

Process Narrative

The Sarbanes Oxley was reviewed for our testing and there was no change from previous year. No further work necessary.

SOURCE DR 9

42-4

Florida Power & Light Company
 Hedging Activities
 Dkt# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

Title Recalculation to Filing

12/9/15
 9/15/15

March Filing

Month	Derivatives Report Gains/Loss A	Broker Fees B	Gas Reserves C	Gains/Loss Per filing D	Brokers Fees Difference E	REFERENCE
August 2014	[REDACTED]					TESTED IN WP. 43-3, & 43-3/1P.1-5 /
September 2014						
October 2014						
November 2014						
December 2014						
Total						

WP. 47-1 P1-11,
13 /

WP. 2-1, WP. 2-2/

August Filing

January 2015	[REDACTED]					TESTED IN WP. 43-3/1 P6-11
February 2015						
March 2015						
April 2015						
May 2015						
June 2015						
July 2015						
	1				\$	(259,491,945.00)

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SOURCE AS REFERENCED

43-1

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Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

9/15/14
JLC
9/15

Title List of Counterparties

DECEMBER 2014 LIST OF COUNTERPARTIES

A	VOLUME B	GAIN/LOSS C	REFERENCE
[REDACTED]			WP. 43-3 p. 5 ✓
			WP. 43-3 p. 5 ✓
			WP. 43-3 p. 5 ✓
			WP. 43-3 p. 5 ✓
			WP. 43-3 p. 6 ✓
			WP. 43-3 p. 6 ✓
			WP. 43-3 p. 6 ✓
			WP. 43-3 p. 7 ✓
			WP. 43-3 p. 7 ✓
			WP. 43-3 p. 7 ✓
			WP. 43-3 p. 8 ✓
			WP. 43-3 p. 8 ✓
			WP. 43-3 p. 8 ✓
			WP. 43-3 p. 8 ✓
		WP. 43-3 p. 8 ✓	

tested in Wp. 43-3/1 p.1-5

WP. 43-1 ✓
WP. 43-3 P.8

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Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

9/15/15 GC 9/15

Title List of Counterparties

MAY 2015 LIST OF COUNTERPARTIES

A COUNTERPARTY	VOLUME B	GAIN/LOSS C	REFERENCE
[REDACTED]			WP. 43-3 p.14 ✓
			WP. 43-3 p.14 ✓
			WP. 43-3 p.14 ✓
			WP. 43-3 p. 15 ✓
			WP. 43-3 p. 15 ✓ Tested in Wp. 43-3/1 page 6-11
			WP. 43-3 p. 16 ✓
			WP. 43-3 p. 16 ✓
			WP. 43-3 p. 16 ✓
			WP. 43-3 p. 17 ✓
			WP. 43-3 p. 17 ✓
			WP. 43-3 p. 17 ✓
			WP. 43-3 p. 18 ✓
			WP. 43-1, WP. 43-3 p. 18 ✓

SOURCE AS REFERENCED

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 43-3

[Pages 1 through 18]

Derivatives Report for December 2014 and May 2015

9/15/14 ^{SL}
7/15

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

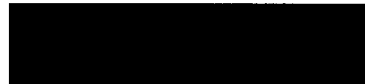
PBC

Title INVOICE

A



B



Derivatives Invoice

Customer Info	Bank Info	Invoice Info
Company Name : FLORIDA POWER AND LIGHT COMPANY	Bank Name : BANK OF AMERICA 111000012	Invoice Number : 266298
Address : 780 University Blvd, Jung Beach FL United States 33408	Bank Address : Jacksonville	Contract Number
Attention of : Settlement Administrator	Account Name : F. P&L CO. CO. US0	Invoice Date : 30-10-2014
Phone : 1-851-304-3934	Account Number : 376032076	Due Date : 03-10-2014
Email	ABA : 111000012	Phone
Fax/TELEPHONE No. : 1-851-459-7399	Please quote Invoice Number and customer name on payment SIT requires an invoice from customers on all payments. Please endorse our invoice and return it via fax, or send your own	1
		2

Comments: 0

Description: 3

Com Syop: [Redacted]

Payment Due Date: 03-Dec-2014

Total Due: FLORIDA POWER AND LIGHT COMPANY 4

Information contained herein is intended solely for the individual or entity specified above. You are hereby notified that any distribution, copying, use of or reliance upon the information contained in this readable transmission by or to anyone other than the recipient designated above is unauthorized and strictly prohibited.

Please notify us immediately if payment or contact details are incorrect

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43-3 P21 P3
P3

C



Authorized and Regulated by the Electrical Services Authority

SOURCE DR # 11

43-3 P1

Florida Power & Light Company
 Hedging Activities
 Dkt# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

9/11/14
 9/11/14

Title Invoice

CONFIDENTIAL
 PBC

ComSwap	A	B	C	D	E	F	G	H	I	J	K	L	M
	Trade Date	Instrument	Start Date	End Date	Buy/(Sell) Qty	Units/Qty	Shall Pays Index 1	Price/Rate	Spread (bps)	Counterparty Pays Index 2	Price/Rate	Spread (bps)	Total Amount
6676106													
6736651													
6817065													
6881115													
6950244													
6912685													
7003190													
7118990													
7201393													
7342279													
7350954													
7402948													

Payment Due Date:	03-Dec-2014
Total Due	1 [REDACTED]

43-3 P1
 1
 P3

N
 [REDACTED]

Authorized and Regulated by the Financial Services Authority

SOURCE DR #11

43-3 P2

Florida Power & Light Company
 Hedging Activities
 Dkt# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

Title Payment Coupon

CONFIDENTIAL
PBC

PAYMENT COUPON

411500676503680001168218000743617004369000

411500676503680001168218000743617004369000
 Please mail this portion with your check:

1800074361 1 of 1

A
 [Redacted]

Cust. No.: 6800011682 : Inv. No.: 1800074361	
This Month's Charges Past Due After 12/03/2014	Amount Due This Invoice; 1 [Redacted]

Make check payable to FPL in USD and mail payments to address below:

FPL
 General Mail Facility
 Miami, FL 33188-0001

Florida Power & Light Company
 Invoice
 Customer Name and Address:
 B
 [Redacted]

Federal Tax ID #: 89-0247775
 Customer Number: 6800011682
 Invoice Number: 1800074361
 Invoice Date: 12/02/2014

411500676500680001168218000743617004369000
 Please retain this portion for your records

CURRENT CHARGES AND CREDITS	
Customer No: 6800011682 Invoice No: 1800074361	
Description	Amount
2 [Redacted]	[Redacted]
For Inquiries Contact Sharon Parib - 561/691-7897	Total Amount Due: 3 [Redacted] This Month's Charges Past Due After: 12/03/2014

43-3 P1 + P2

Account Name: Florida Power & Light Co.
 Bank (Wire & ACH): Bank of America
 Abct. No. (Wire & ACH): [Redacted]
 Wire City/State: New York, NY 10001
 ACH City/State: Dallas, TX
 Wire ABA No.: [Redacted]
 ACH ABA No.: [Redacted]

1800074361 1 of 1

SOURCE DR 11

43-3
1

11/26

Florida Power & Light Company
 Hedging Activities
 Dkt# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

7/15/15
 7/15/15

CONFIDENTIAL
PBC

Title Invoice

Invoice

Invoice: 251384 A
 Counterparty:
 Date:
 Period:
 Amount:
 1 Due Date: Dec 03, 2014

Florida Power & Light Company
 Tax ID # 59-0247775
 ARMS Processing (PPC/GO)
 General Mail Facility
 Miami, FL 33188-001

Y-6800011682 GL 2500000 7/10 6320001498 Doc# 1800074361

Invoice To: [Redacted]

Summary

Michelle Doerly
 Michelle Doerly
 Manager, Power & Fuels Accounting

Deal Type	Deal Direction	Amount Due	Currency
SWPS	Buy	[Redacted]	USD
SWPS Subtotal		[Redacted]	USD
TOTAL:		[Redacted]	USD

Details

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Deal Price	Flat Price	Pay Price	Amount Due	Currency
1129977	Buy					MMBTU					USD
1192795	Deal					MMBTU					USD
1141308	Deal					MMBTU					USD
1149844	Deal					MMBTU					USD
1150963	Deal					MMBTU					USD
1157168	Deal					MMBTU					USD
1170175	Deal					MMBTU					USD
1179119	Deal					MMBTU					USD
1201784	Deal					MMBTU					USD

Index
 ✓ Traced to Dealtickets DR# 12
 7 Traced to Platts Gas Daily DR# 12
 (7) Traced to Wp 43-4
 Δ These deals were traced to Confirmation Notices - see wp 43-3 ✓
 2

SOURCE DR # 11

43-3 P4

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Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

9/15/14
7/1/15

Title EDVOICE

Invoice

Invoice: 251984
Counterparty: [REDACTED]
Date: [REDACTED]
Period: [REDACTED]
Amount: [REDACTED]
1 Due Date: Dec 03, 2014

Florida Power & Light Company
Tax ID # 59-0247775

Deal #	Type	Trade Dt	Terr	Index	Volume	UoM	Deal Price	Float Price	Pay Price	Amount Due	Currency
SWPS	Buy		B	C	D	E	F	G	H	I	
✓ 1205838	Deal	[REDACTED]				MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	USD
✓ 1210118	Deal	[REDACTED]				MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	USD
✓ 1210522	Deal	[REDACTED]				MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	USD
									Buy Subtotal	[REDACTED]	USD
									SWPS Subtotal	[REDACTED]	USD
									TOTAL	[REDACTED]	USD

Payment Details

Wire
Bank: Bank of America
Dallas, TX
Acct Name: Florida Power & Light Company

ABA #: [REDACTED]
Account #: [REDACTED]
Addr Code:

ACH
Bank:
Acct Name: Florida Power & Light Company

ABA #:
Account #:
Addr Code:

43-3 P1 + P2
1

If you have any questions, please contact Sharon Patria at entlrvoces@fpl.com (email). If remitting an amount different than the total billed, please email the appropriate supporting documents.

Index

- ✓ Traced to Deal tickets, DR #12
- ✓ Traced to Platts Gas Daily, DR #12
- △ Traced to Confirmation Notices on up $\frac{43-3}{2}$

SOURCE DR #11

43-3 P5
1

9/16/15
2/11/15

A



Invoice

43-3 Pg 1

<p>Customer Information</p> <p>Address: FLORIDA POWER & LIGHT COMPANY</p> <p>United States</p> <p>Attention: Sharron Patrie Phone: 561-691-7897 ax: mail: Sharon.Patrie@FPL.com</p>	<p>Remit By Wire Transfer to</p> <p>[Redacted]</p> <p>B</p> <p>[Redacted]</p>	<p>Invoice Information</p> <p>Invoice Number: 4201046-1 P1</p> <p>Invoice Date: April 29, 2015 Due Date: C May 05, 2015</p> <p>[Redacted]</p>
--	--	--

Florida Power & Light Company
Hedging Activities
DK# 150001-EL, ACN 15-051-4-1
8/1/14 - 7/31/15

Title INVOICE

2 PAYMENT DUE DATE: May 05, 2015

43-3/187

P1
43-3
P15

ENTERED BY: SHARON PATRIE DATE: 5/4/15
PHONE: (561)691-7897 COMPANY CODE 1500
AUTHORIZED BY _____
REQUIRED IF UNDER \$250
SAP DOCUMENT #(S): 1900379176
ACCT NUMBER: 2500000 I/O 6370001498

Michelle Doery

Michelle Doery
Manager, Power & Fuels Accounting

SOURCE DL # 11

per

Florida Power & Light Company
 Hedging Activities
 DK# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

all A
 9/1/15

A



Invoice

43-3 P7

Swaps											
#	Trade ID	Trade Date	C	Index 1	Index 2	Delivery Month	Unit	Notional Quantity	F Fixed Price	G Float Price	H Amount Due
1	18168481						MMBTU				
2	18177268						MMBTU				
3	18337255						MMBTU				
4	18616116						MMBTU				
	18759731						MMBTU				
	18774806						MMBTU				
	19118758						MMBTU				
	19507026						MMBTU				
	19978088						MMBTU				
	20138558						MMBTU				
	20358951						MMBTU				
	20910102						MMBTU				
	21084176						MMBTU				
	21209568						MMBTU				
	21300013						MMBTU				
	21355963						MMBTU				
	21361846						MMBTU				
	21395436						MMBTU				
	21707508						MMBTU				
	21709954						MMBTU				
21	21869557						MMBTU				
22	22107785						MMBTU				
23	24620478						MMBTU				
24	24620480						MMBTU				
25	24620483						MMBTU				
26	24620485						MMBTU				
Total Trades 26											

Title Invoice

CONFIDENTIAL

PBC

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SOURCE DL #11

Florida Power & Light Company
Hedging Activities
DK# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

CONFIDENTIAL

PBC

Title INVOICE

A

Invoice

PAYMENT DUE DATE:

May 05, 2015

1

43-3
1 P7

43-3
1 P9

SOURCE DR #11

9/15/14
2/15/15

433
P8

Purchase Statement

Purchase Statement: 268031

A

Counterparty:

Date:

Period:

Amount:

1 Due Date: May 05, 2015

CONFIDENTIAL


PBC

Florida Power & Light Company
 Tax ID # 59-0247775
 ARMS Processing (PPC/GO)
 General Mail Facility
 Miami, FL 33188-001




433 P9

Florida Power & Light Company
 Hedging Activities
 DK# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

Title Purchase Statement



























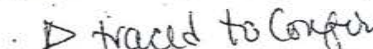






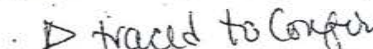
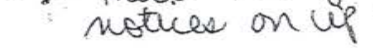





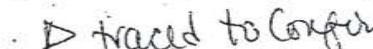
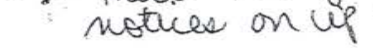






To 

Primary

Deal Type	Deal Direction	Amount Due	Currency
SWPS	Buy		USD
SWPS Subtotal			USD
TOTAL			USD

433 P

Details

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Deal Price	Float Price	Pay Price	Amount Due	Currency
SWPS											
Buy		D	E	F	G			I	J	K	
✓ 1279152	Deal				✓ 	MMBTU					USD
✓ 1279182	Deal				✓ 	MMBTU					USD
✓ 1286412	Deal				✓ 	MMBTU					USD
✓ 1299308	Deal				✓ 	MMBTU					USD
✓ 1304865	Deal				✓ 	MMBTU					USD
✓ 1305505	Deal				✓ 	MMBTU					USD

Contract Price

SOURCE DR# 11

hd
 > traced to Confirmation notices on up 433/2

Index
 ✓ traced to Deal ticket, DR# 13
 X traced to Platts Gas Daily April 29, 2015 DR# 13

9/11/14 DR 7/11/15

Purchase Statement

Purchase Statement: 268031 A
Counterparty: [REDACTED]
Date: [REDACTED]
Period: [REDACTED]
Amount: [REDACTED]
1 Due Date: May 05, 2015

43-3 P10

Florida Power & Light Company
Tax ID # 59-0247775

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Purchase Statement

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Deal Price	Float Price	Pay Price	Amount Due	Currency
--------	------	----------	------	-------	--------	-----	------------	-------------	-----------	------------	----------

		B	
Buy Subtotal	[REDACTED]		USD
SWPS Subtotal	[REDACTED]		USD
TOTAL	[REDACTED]		USD

Payment Details

43-3 P7

Bank:

ABA #:

Account #:

Addr. Code:

* Name: Citibank NA

Bank:

ABA #:

Account #:

Addr. Code:

Acct Name: Citibank NA

If you have any questions, please contact Sharon Patrie at emtinvoices@fpl.com (email). If remitting an amount different than the total billed, please email the appropriate supporting documents.

CONFIDENTIAL

PBC

SOURCE DR # 17

Purchase Statement

Purchase Statement: 268031 A

Counterparty: [REDACTED]
 Date: [REDACTED]
 Period: [REDACTED]
 Amount: [REDACTED]

1 Due Date: May 05, 2015

Florida Power & Light Company
 Tax ID # 59-0247775

PBC

Deal # Type Trade Dt Term Index Volume UoM Deal Price Float Price Pay Price Amount Due Currency

SWPS

B C D E F G H I

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Deal Price	Float Price	Pay Price	Amount Due	Currency
4	Deal					MMBTU					USD
3	Deal					MMBTU					USD
0	Deal					MMBTU					USD
3	Deal					MMBTU					USD
5	Deal					MMBTU					USD
1	Deal					MMBTU					USD
1	Deal					MMBTU					USD
1	Deal					MMBTU					USD
1	Deal					MMBTU					USD
1	Deal					MMBTU					USD
1	Deal					MMBTU					USD
1	Deal					MMBTU					USD
1	Deal					MMBTU					USD
1	Deal					MMBTU					USD
1392523	Deal					MMBTU					USD
1392556	Deal					MMBTU					USD
1396843	Deal					MMBTU					USD
1402229	Deal					MMBTU					USD
1465585	Deal					MMBTU					USD
1466586	Deal					MMBTU					USD
1466587	Deal					MMBTU					USD
1466588	Deal					MMBTU					USD

Florida Power & Light Company
 Hedging Activities
 Dkt# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

Title Purchase Statement

sd

43-3-11

SOURCE DL #11

9/15 a/16 MW

43-3
7

The source of this schedule is the Confirmation Notices
 These Confirmation Notices were traced to the deal tickets and invoices -See Workpaper WP. 43-3/1 p.4-5,9

Florida Power & Light Company
 Hedging Activities
 DK# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

Deal tickets to Conf.

Deal number	From: A	To: Counterparty	Invoice Number	C Fixed Price	Trader	WP. REFERENCE
19977 1		FPL B	251384		Lystra Loutan	WP. 43-3/1 page 4 ✓
12795	FPL		251384		Lystra Loutan	WP. 43-3/1 page 4 ✓
11306	FPL		251384		Rajgopalan Lyer	WP. 43-3/1 page 4 ✓
19644	FPL		251384		Rajgopalan Lyer	WP. 43-3/1 page 4 ✓
10963	FPL		251384		Lystra Loutan	WP. 43-3/1 page 4 ✓
17166	FPL		251384		Lystra Loutan	WP. 43-3/1 page 4 ✓
170142	FPL		251384		Lystra Loutan	WP. 43-3/1 page 4 ✓

Deal number	Buyer	D Seller	E Price	Trader	WP. REFERENCE
79119	FPL		251384	Rajgopalan Lyer	WP. 43-3/1 page 4 ✓
101794	FPL		251384	Rajgopalan Lyer	WP. 43-3/1 page 4 ✓
1206868	FPL		251384	Lystra Loutan	WP. 43-3/1 page 5 ✓
1210118	FPL		251384	Lystra Loutan	WP. 43-3/1 page 5 ✓
1219522	FPL		251384	Lystra Loutan	WP. 43-3/1 page 5 ✓
1279152	FPL		268031	Rajgopalan Lyer	WP. 43-3/1 page 9 ✓
1279182	FPL		268031	Rajgopalan Lyer	WP. 43-3/1 page 9 ✓
1286412	FPL		268031	Lystra Loutan	WP. 43-3/1 page 9 ✓
1299308	FPL		268031	Lystra Loutan	WP. 43-3/1 page 9 ✓
1304865	FPL		268031	Rajgopalan Lyer	WP. 43-3/1 page 9 ✓
1305505	FPL		268031	Lystra Loutan	WP. 43-3/1 page 9 ✓

CONFIRMATION

SOURCE AS REFERENCED

CONFIDENTIAL

(ESTIMATED EXPENSES)

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

MONTH ADJUSTMENTS

9/15
9/15/14

Title Monthly Gas Closing

GULFSTREAM USAGE CHARGE (#08020411)	10,850,000	0.5600	\$	6,067,800.00
GULFSTREAM RESERVATION CHARGE (#9000820)	10,840,782	0.0069	\$	74,001.40
GULFSTREAM USAGE CHARGE (#9000828)	146,000	6.4760	\$	947,676.00
GULF SOUTH PIPELINE RESERVATION CHARGE (#400097)	9,921,024	0.0080	\$	79,372.48
GULF SOUTH PIPELINE RESERVATION CHARGE (#41618)	100,000	7.2210	\$	722,100.00
GULF SOUTH PIPELINE USAGE CHARGE (#41618)	4,635,390	0.0080	\$	37,083.12
GULF SOUTH PIPELINE RESERVATION CHARGE (#41619)	100,000	5.4760	\$	547,600.00
GULF SOUTH PIPELINE USAGE CHARGE (#41619)	5,694,028	0.0040	\$	22,776.11
SESH RESERVATION CHARGE (#840001)	12,400,000	0.2750	\$	3,410,000.00
SESH USAGE CHARGE (#840001)	10,873,590	0.0064	\$	69,711.02
SESH RESERVATION CHARGE (#840002)	3,100,000	0.2750	\$	852,500.00
SESH USAGE CHARGE (#840002)	3,100,000	0.0064	\$	19,840.00
SESH RESERVATION CHARGE (#040097-R1)	80,000	8.3648	\$	669,186.40
SESH USAGE CHARGE (#040097-R1)	2,480,001	0.0059	\$	14,632.00
TRANSCONTINENTAL RESERVATION CHARGE (#9101648)	6,200,000	0.09945	\$	616,590.00
TRANSCONTINENTAL USAGE CHARGE (#9101648)	5,075,132	0.00457	\$	23,199.35
REBUNDLED - FGT	20,000	0.0000	\$	-
REBUNDLED - Gulfstream	22,000	0.0000	\$	-
Subtotal for Transportation	105,899,610		\$	54,409,527.36

Contract Term Feb 8, 2008 through Oct 01, 2032
 Contract Term June 1 2005 through June 2028
 Firm Transport per Gulfstream Transportation Journal
 Apr thru Oct Only - Through 2017
 Apr thru Oct Only - Through 2017
 Contract Term Apr 1, 2015 through Mar 31, 2025
 Contract Term Apr 1, 2015 through Mar 31, 2025
 Contract Term Apr 1, 2015 through Mar 31, 2025
 Contract Term Apr 1, 2015 through Mar 31, 2025
 Contract Term Sep 6, 2008 through Sep 5, 2020
 Contract Term Sep 6, 2008 through Sep 5, 2020
 Contract Term Sep 6, 2008 through Sep 5, 2020
 Contract Term Sep 6, 2008 through Sep 5, 2020
 Contract Term Jan 1, 2012 through Dec 31, 2017
 Contract Term Jan 1, 2012 through Dec 31, 2017
 Contract Term May 1, 2011 through Apr 30, 2016
 Contract Term May 1, 2011 through Apr 30, 2016
 REBUNDLED FIRM TRANSPORT
 REBUNDLED FIRM TRANSPORT

BAY GAS STORAGE (Monthly Charge on 2.5 MM Capacity Including Subtotal for Storage Costs)



FGT - Turkey Point Compressor Station #22
FGT - Cape Canaveral Compressor Station #32

TOTAL

GAS RESERVES

OWED TO

D	E	F
QNTY (MMBTU)	UNIT PRICE (\$/MMBTU)	CUMULATIVE REDUCTION (\$)

Gas Reserves - Physical
Gas Reserves - Transportation

REFER TO GAS RESERVES TAB

TOTAL

OTHER MISCELLANEOUS EXPENSES INCURRED FOR CURRENT MONTH: [TO BE PAID IN FOLLOWING MONTH, UNLESS NOTED OTHERWISE]

\$ 12,581,963.24

OWED TO

QNTY (MMBTU)	UNIT PRICE (\$/MMBTU)	INVOICE AMT (\$)
--------------	-----------------------	------------------

FGT Financial Activity
Less Power Related Financial Activity
Total Financial Activity Related to Fuel Expense

REFER TO FINANCIAL ATTACHMENT

Total Adjustments

REFER TO EXPENSE ATTACHMENT

TOTAL

CARMS (MISC. BILLS) FOR MONEY RECEIVED DURING CURRENT MONTH:

\$ 12,581,963.24

FROM	CARMS INVOICE	UNIT PRICE (\$/MMBTU)	AMT RECEIVED (\$)	COMMENTS
Sales			\$ 469,100.00	478,095 WP 43-5 P2
Adjustments			8,995.93	REFER TO SALES TAB
Optimization Sales			12,103,867.31	REFER TO OPTIMIZATION SALES TAB (refer to tab fo)
TOTAL			12,581,963.24	

NET CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT MONTH

\$ 247,602,169.92

ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU]

54,410,811

EQUIVALENT UNIT PRICE FOR CURRENT MONTH (\$/MMBTU)

4.5488

FGT "GAS DAY" ENERGY MEASURED for MONTH [MMBTU]	FGT STATION	AVG HEAT VALUE [MMBTU/MCF]	HEAT VALUE APPLICABLE TO:
32,963,186	BROOKER =	1.0280	PPN, PSN, PCC
	PERRY STREAM 1 =	1.0280	FTMYERS
Gulfstream deliveries to Manatee/Marlin/West County for MONTH	WEST PALM =	1.0270	PMR, PRV, PPE, PFL, PCU, PTF
21,555,160	GNGS =	1.0249	MANATEE
	GNGS =	1.0247	MARTIN
54,518,326	GNGS =	1.0248	WEST COUNTY

SOURCE DR #17

Index

Traced to up 2-2851 43-5 p.
Traced to J.E.

December 2014

CONFIDENTIAL

TO BE PAID IN FOLLOWING MONTH
 SUMMARY BY NATURAL GAS SUP

SUPPLIER NAME

Title Monthly Gas Closing Rep.

Florida Power & Light Company
 Hedging Activities
 Dkt# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

9/15/14

Title Monthly Gas Closing Report

9/15/14

1	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]	[REDACTED]
7	[REDACTED]	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]	[REDACTED]
9	[REDACTED]	[REDACTED]	[REDACTED]
10	[REDACTED]	[REDACTED]	[REDACTED]
11	[REDACTED]	[REDACTED]	[REDACTED]
12	[REDACTED]	[REDACTED]	[REDACTED]
13	[REDACTED]	[REDACTED]	[REDACTED]
14	[REDACTED]	[REDACTED]	[REDACTED]
15	[REDACTED]	[REDACTED]	[REDACTED]
16	[REDACTED]	[REDACTED]	[REDACTED]
17	[REDACTED]	[REDACTED]	[REDACTED]
18	[REDACTED]	[REDACTED]	[REDACTED]
19	[REDACTED]	[REDACTED]	[REDACTED]
20	[REDACTED]	[REDACTED]	[REDACTED]
21	[REDACTED]	[REDACTED]	[REDACTED]
22	[REDACTED]	[REDACTED]	[REDACTED]
23	[REDACTED]	[REDACTED]	[REDACTED]
24	[REDACTED]	[REDACTED]	[REDACTED]

TOTAL - SUPPLY 42,934,226 4.0585 \$ 174,676,343.50

SUMMARY BY NATURAL GAS TRANSPORTER

TRANSPORT TYPE & CONTRACT NUMBER	QTY (MMBTU)	UNIT PRICE (\$/MMBTU)	INVOICE AMT (\$)
FOT - FTS1 RESERVATION CHARGE (#3247)	7,853,000	8.4994	66,540,070
FOT - FTS1 USAGE CHARGE (#3247)	3,372,297	0.0361	121,048.20
FOT - FTS2 RESERVATION CHARGE (#3523)	16,245,000	0.7185	11,646,382.50
FOT - FTS2 USAGE CHARGE (#3523)	8,853,318	0.0669	591,277.58
FOT - FTS3 RESERVATION (#111145)	32,400,000	1.1100	36,000,000.00
FOT - FTS3 USAGE CHARGE (#111145)	11,061,137	4.0091	44,353,021
GULFSTREAM RESERVATION CHARGE (#0001411)	10,818,000	0.8100	8,760,540.00
GULFSTREAM USAGE CHARGE (#0001411)	10,510,318	0.0489	510,282.68
GULFSTREAM RESERVATION CHARGE (#0000328)	10,818,000	0.6600	7,137,840.00
GULFSTREAM USAGE (#0000328)	8,094,393	0.0067	53,724.31
SESH RESERVATION CHARGE (#140001)	12,400,000	0.2769	3,427,440.00
SESH USAGE CHARGE (#140001)	8,458,747	0.0094	79,550.51
SESH RESERVATION CHARGE (#240002)	3,100,000	0.2250	697,500.00
SESH USAGE CHARGE (#240002)	3,000,000	0.0062	19,200.00
SESH RESERVATION CHARGE (#40007-R1)	10,000	0.3448	3,448.00
SESH USAGE CHARGE (#40007-R1)	2,100,000	0.0059	12,510.00
TRANSCONTINENTAL RESERVATION CHARGE (#1010448)	4,300,000	0.2193	943,710.00
TRANSCONTINENTAL USAGE CHARGE (#1010448)	4,517,542	0.0062	28,110.18
PEOPLES GAS SYSTEM	61,627	0.0370	2,279.81
REBUNDLED - FOT	501,256	0.0000	-
REBUNDLED - GULFSTREAM	-	-	-
Subtotal for Transportation	111,872,191	G	41,876,872.99

December-2014

COMMENTS
 FTS1 - FIRM TRANSPORT 1140189 thru 07/31/2015
 FTS1 - FIRM TRANSPORT 1101569 thru 07/31/2015
 FTS2 - FIRM TRANSPORT 1071494 thru 03/26/2015
 FTS2 - FIRM TRANSPORT 1071493 thru 03/26/2015
 Contract Term - Effective 4/1/11 for 25 years
 Contract Term - Effective 4/1/11 for 25 years
 Contract Term Feb 8, 2005 through Oct 01, 2032
 Contract Term Feb 8, 2005 through Oct 01, 2032
 Contract Term June 1, 2005 through June 2028
 Firm Transport per Gulfstream Transportation Journal
 Contract Term Sep 8, 2008 through Sep 5, 2020
 Contract Term Sep 8, 2008 through Sep 5, 2020
 Contract Term Sep 8, 2008 through Sep 5, 2020
 Contract Term Jan 1, 2012 through Dec 31, 2017
 Contract Term Jan 1, 2012 through Dec 31, 2017
 Contract Term May 1, 2011 through Apr 30, 2016
 Contract Term May 1, 2011 through Apr 30, 2016
 Peoples Gas Annual Volume Share Penalty accrues in Mar for Apr Pk
 REBUNDLED FIRM TRANSPORT
 REBUNDLED FIRM TRANSPORT

DAY GAS STORAGE (Monthly Charge on 2.4 MM Capacity including Inp/Withdraw Fees)

FOT - Turkey Point Compressor Station #2
 FOT - Cape Canaveral Compressor Station #2

TOTAL

REVERSE TOLLING SUMMARY

TOLLING TRANS MONTH	QTY (MMBTU)	UNIT PRICE (\$/MMBTU)	CUMULATIVE REDUCTION (\$)	COMMENTS
	0	N/A	0.00	NONE

OTHER MISCELLANEOUS EXPENSES INCURRED FOR CURRENT MONTH:

(TO BE PAID IN FOLLOWING MONTH, UNLESS NOTED OTHERWISE)

OWED TO	QTY (MMBTU)	UNIT PRICE (\$/MMBTU)	INVOICE AMT (\$)	COMMENTS
FOT Financial Activity	[REDACTED]	[REDACTED]	[REDACTED]	REFER TO FINANCIAL ATTACHMENT
Total Additions	[REDACTED]	[REDACTED]	[REDACTED]	REFER TO EXPENSE ATTACHMENT
TOTAL	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

43-6 P2

CASH (DEBIT, CREDIT) FOR MONEY RECEIVED DURING CURRENT MONTH:

TOTAL 7,443,892.53

FROM	CASH INVOICE	UNIT PRICE (\$/MMBTU)	AMT RECEIVED (\$)	COMMENTS
Sales				
Adjustments			(31,018.19)	REFER TO SALES TAB
Optimization Sales			7,474,910.72	REFER TO OPTIMIZATION SALES TAB (refer to tab for details)
TOTAL			7,443,892.53	

NET CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT MONTH

ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH (MMBTU)

EQUIVALENT UNIT PRICE FOR CURRENT MONTH (\$/MMBTU)

FOT GAS DAY ENERGY MEASURED FOR MONTH	FOT STATION	AVG HEAT VALUE (MMBTU/GCF)	HEAT VALUE APPLICABLE TO:
22,397,261 (MMBTU)	BROOKER =	1.0330	PPH, PSH, PCC
	PERRY STREAM 1 =	1.0184	FISHERS
	WEST PALM =	1.0106	PSH, PRV, PPE, PFL, PCU, PTF
	GUDS =	1.0109	SAWATEE
	OHOS =	1.0192	DARTY
	OHOS =	1.0183	WEST COUNTY
Gulfstream deliveries to Manatee/Polk/West County for MONTH			
17,445,427			
40,032,717			

43-6 P1

SOURCE DIR 20

G/L Account Line Item Display

G/L Account Line Item Display

Company Code

Account Code

Account Name

Account Description

Account Type

Account Date

Account Amount

Account Currency

Account Text

Account Order

Account Date

Account Amount

Account Currency

Account Text

Account Order

Account Date

Account Amount

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Account Order

Account Date

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Handwritten initials: J.E., 9/15, 9/15

PBC CONFIDENTIAL

Title J.E

Table with columns: Sr, Assignment, Description, Date, Type, Dpc. Date, Pct, Amount to Total, Curr, Tx, Text, Order, Pctg Date. Contains multiple rows of financial data with some redacted cells.

Prints Window Contents

END

Handwritten circled notes: 436 P1

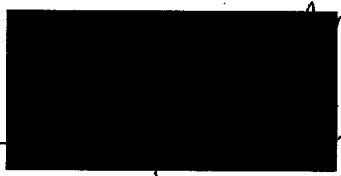
Handwritten circled notes: 43-6 P3



Per Monthly Gas Closing Report
Per Journal Entry

Handwritten circled notes: WP43-6 P3

Handwritten circled notes: 43-3 P8, 43-6 P8



Derivatives Report
Monthly Gas Closing Report
immaterial difference

SOURCE DR 20

Handwritten: 43-6 P2

DECEMBER COMBINED PURCHASES AND SALES

CONFIDENTIAL

43-683

Counterparty Portfolio
J. Aron & Comp FPL Optimization Program

Volume	Deal Num	Direction	Contract	Deal Cate	Deal Type	Price	Description	Contract Number	Strategy	Legacy Dr	Volume (Signed)	Period-End Gain/Los
			A									
MMBTU	1407645	SALE	1	201412								
	1408252	SALE	2	201412								
	1408253	SALE	3	201412								

NOTE: These transactions should not have been included in the Gas Closing Report. Therefore they were not booked in SAP.

SAP [redacted]
43-1 P2

9/15
9/15

Florida Power & Light Company
Hedging Activities
DK# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Journal entry

CONFIDENTIAL

PBC

P3

SOURCE DR 20

CONFIDENTIAL

9/15/15
9/15/15

Hedging Audit 2015 – Docket No. 150001
Audit Request No. 3, Part 3
Title Tolling Arrangements
(None)

PBC

Q: A statement regarding tolling arrangements...for the period August 1, 2014 – July 31, 2015.

A: FPL executed its 2013 hedging strategy, for the projected year of 2014, in accordance with the 2013 Risk Management Plan filed with the Commission (page nos. 5-6, which addressed natural gas hedging has been included as part of this response). FPL executed its 2014 hedging strategy, for the projected year of 2015, in accordance with the 2014 Risk Management Plan filed with the Commission (page nos. 5-6, which addressed natural gas hedging has been included as part of this response). [REDACTED] were utilized for hedging projected natural gas requirements prior to March 2015. [REDACTED] were utilized for hedging projected natural gas requirements from March 2015 forward. The hedging results for the period from August 2014 to July 2015 are summarized in the Derivative Settlements reports provided in response to hedging audit request no. 1. Tolling arrangements were not utilized when hedging either 2014 or 2015 projected natural gas requirements.

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 45-1

[Pages 1 through 6]

Planned Position Strategy

Florida Power & Light Company
Hedging Activities
Lkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Planned Position Specialist

		HEDGING PROGRAM POSITIONS							
		LATEST PROJECTION	(B) A	B (A)	C	NATURAL GAS	E	(A) (B) F	G
Date:									
August-14	7/7/2014								
September-14	8/5/2014								
October-14	9/2/2014								
November-14	10/7/2014								
December-14	11/4/2014								
January-15	12/2/2014								
February-15	1/6/2015								
March-15	2/2/2015								
April-15	3/2/2015								
May-15	4/7/2015								
June-15	5/5/2015								
July-15	6/2/2015								

Hedged volumes are determined by applying the hedged percentage target to projected physically hedged natural gas amounts and fuel burns
Hedged dollars represent a calculated notional value (trade price * volume purchased and/or sold)
Physical hedged dollars are based on actual costs of natural gas reserves production activities
Projections are (re)calculated each month. Rebalancing transactions are executed to bring hedged percentages within approved tolerance bands
Management approval can allow the hedged percentage to be outside of the tolerance bands in some cases

wp42-176

PBC

CONFIDENTIAL

Index

- * Traced to Monthly Derivative Settlements Reports 45-1 P1-12
- # Recalculated by Staff
- # Traced to Fuel Burn Summaries on wp 45-1 P1-12.

SOURCE DR #9

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 45-1/1

[Pages 1 through 12]

Fuel Burn Summaries

CONFIDENTIAL

FPL Ga

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

is (March 2015)

PBC

Title Physical Hedging

9/15

46-1p2

PBC

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Physical Hedging

46-1p1
46-1p2

SOURCE DR 3 part 7

9/15/15

25

CONFIDENTIAL FPL Gas Res

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

arch 2015)

PBC

46-183

Title Physical Hedging

1
2



2-dp3

See recalculation of /
LOSS on WP 46-1P12.

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Physical Hedging

CONFIDENTIAL

PBC

SOURCE DR 3, Part 1

9/16

2/1/16

CONFIDENTIAL

FPL Gas Resources Limited Electrical Hedging Case (April 2015)

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

PBC

46-184

1
2



Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Physical Hedging

CONFIDENTIAL

PBC

SOURCE DR 3, Part 1

2/1/15

CONFIDENTIAL ^{FPLC}

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Gas (April 2015)

PBC

46-1 B

Title Physical Hedging

1
2

2/1/15

2-2p4

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Physical Hedging

CONFIDENTIAL

PBC

SOURCE DR 3 Part 1

9/15/14

CONFIDENTIAL

FPLC

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Gas (May 2015)

PBC

46-186

1
2



Title Physical Hedging

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Physical Hedging

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CONFIDENTIAL

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SOURCE PR 3 Part 1

Handwritten initials and date: 9/15/14

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Hedge Gas (May 2015)

PBC

46-187

Title Physical Hedging

1
2



Handwritten circled text: 2-2 p5

PBC

SOURCE D23 Part 1

9/15/15

CONFIDENTIAL

EPLC

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Fas (June 2015)

9/15

PBC

46-198

Title

Physical Hedging

1
2



PBC

SOURCE Dkt 3, Part 1 (provided 8/19/15)

9/15/15

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

ical Hedge Gas (June 2015)

PBC

46-189

Title Physical Hedging

1
2



2-286

PBC

SOURCE DL3 part 1

7/15/14

CONFIDENTIAL

FPI

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Gas (July 2015)

9/15

PBC

46-1 P10

1
2



Title: Physical Hedging

PBC

SOURCE DL3, Part 1

9/15/14

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

if Hedge Gas (July 2015)

PBC

46-1811

Title Physical Hedging

1
2



2-dfz

PBC

SOURCE DR 3, Part 1

19/16
CONFIDENTIAL

Florida Power & Light Company
 Hedging Activities
 Dkt# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

SL 9/15

Title Recalculation of Loss

Recalculation of Gains/Loss for Physical Hedging March 2015

	A	B	Reference
(a)	1458389	deal number	Wp. 46-1p.2, 46-1/1 p.1
(b)			Wp. 46-1/1 p.2 /
(c)			Wp. 46-1/1 p.7 /
(d)			Wp. 46-1/1 p.10 /
(e)			Wp. 46-1/1 p.2 /
(f)			Wp. 46-1/1 p.2 and p. 11 /
(g)			Wp. 46-1/1 p.2 /
(h)			Wp. 46-1/1 p.2 / if 6

(c)+(d)=

1

(f)-(e) = (g)

(g)*(b)=(h)

C

D

Index price
Actual price

Recalculation of
Gain/Loss

1

2

3

46-1
 (A)

also
5/18

CONFIDENTIAL FPL
46-1186

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

e Gas (March 2015)

PBC

Title Physical Hedging

1
2



(A)
46-1182
46-1-1182

PBC

SOURCE DR #19

46-1
1

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Hedge Gas (March 2015)

PBC

5/18
PBC
4/11/15

gl
9/11/15

P2
46-1

Title Physical Hedging

1
2
3



46-116
1

4



(F-E)=G (G+B)=H

See Recalculation of
Loss on WP 46-1 p2!

\$

PBC

P2

SOURCE DR #19

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

edge Gas (June 2015)

PBC

Title Physical Hedging

8/2
9/15

46-1 P3

9/15/15
2/15/15

1
2



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P3

SOURCE DR #19

CONFIDENTIAL EPL Ga

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

ias (June 2015)

PBC

46-1
P4
7

6/1/15
5/28/15

Title Physical Hedging

1
2
3



46-1 P3
1



(L) (H)

46-1 P1
12

46-1
114

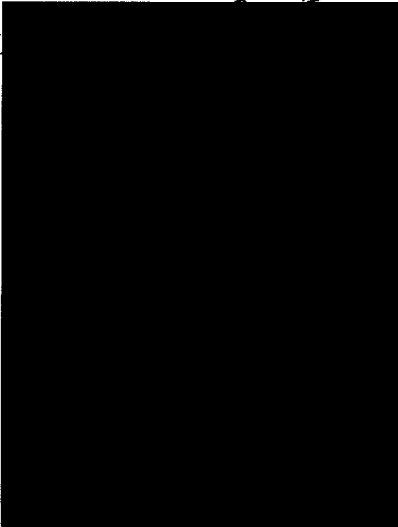
(H)

Index

(H) Recalculated by
Stacy

A

46-1 P7



J =
K = +

P13

M =
L =

(H)

N =

46-1 P12
1

PBC

SOURCE DR # 19

PBC

Title

Deal ticket

CONFIDENTIAL

PBC

AL 8/15

Tier #1: Fixed Price Is zero

Status Saved-Locked-ConfirmSent-ConfirmExecuted-Invoiced-Exclude(M2M)-RiskRpt Modified sxp0a8q 2015-06-11 06:30:43 Created wjm0xuk 2015-02-20 13:45:01

Number 1458389 Ticket 46-1/19

Tiers (Not Shaped)

1 Trade Date [Redacted] Trader Bill Murphy

2 Portfolio Gas Reserves -GR Woodford

3 Counterparty [Redacted]

4 Deal From [Redacted]

Term Term Contract FPL-NSB-10-101

Strategy LEREXC

Exec Method Email ExecTime 16:52

Currency USD Unit Of Measure MMBTU

Tier 1: A

Start Date [Redacted]

End Date [Redacted]

Price Type [Redacted]

Trigger Party [Redacted]

Trigger Settle Type [Redacted]

Pipeline [Redacted]

Zone [Redacted]

Point [Redacted]

Basis Point [Redacted]

Formula [Redacted]

Fixed Price [Redacted]

Basis [Redacted]

Premium [Redacted]

Volume [Redacted]

Frequency [Redacted]

Daily Volume [Redacted]

Invoiced [Redacted]

Broker Commissions

Volume Charges

Broker	Freq	Fee	Cur	Inv

Charge Type	Charge

Notes

5 Internal Notes [Redacted] Manual Confirm

Special Terms [Redacted] Include In Notional Calculation

6 Pricing Notes [Redacted] DF Reportable Not Reportable

Close

A

PBC

Title Actual Volume

CONFIDENTIAL

gl
9/15

9/15
gl
8/15

PBC

Authority not granted to actualize Gas Volumes

End Date: Tue 03/31/2015 Activate Force Majeure

#	Deal	Date	Pipeline	Zona	Point Code	Contract Volume	Actual Volume	Force Majeure Volume	Force Majeure Event	Import/Export Volume
1	1458389.T1						0			0
2	1458389.T1						0			0
3	1458389.T1						0			0
4	1458389.T1						0			0
5	1458389.T1						0			0
6	1458389.T1						0			0
7	1458389.T1						0			0
8	1458389.T1						0			0
9	1458389.T1						0			0
10	1458389.T1						0			0
11	1458389.T1						0			0
12	1458389.T1						0			0
13	1458389.T1						0			0
14	1458389.T1						0			0
15	1458389.T1						0			0
16	1458389.T1						0			0
17	1458389.T1						0			0
18	1458389.T1						0			0
19	1458389.T1						0			0
20	1458389.T1						0			0
21	1458389.T1						0			0
22	1458389.T1						0			0
23	1458389.T1						0			0
24	1458389.T1						0			0
25	1458389.T1						0			0
26	1458389.T1						0			0
27	1458389.T1						0			0
28	1458389.T1						0			0
29	1458389.T1						0			0
30	1458389.T1						0			0
31	1458389.T1						0			0

1. Total Contract Volume: [redacted] Total Force Majeure Volume: 0 Total Import/Export Volume: 0

(B)
 46-1 P2
 46-1 P2
 1

OK Cancel

SOURCE DR#19

46-1
1 P6

CONFIDENTIAL

FBC

C

BUYER:

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15 A

SELLER:

B

INVOICE

Invoice ID: 49126 P1
Invoice Date: 4/7/15
Payment Date: 4/27/15
Delivery Month: 2015-03-01
Invoice Status: FINAL

9/15
2/1
8/1

Title: Invoice

TXN #	Buy/Sell	Pipeline	Txn Type	Location	Delivery Date	Volume	Index	Price	Amount
120905	NA	1							
		2							
		3							
		4							
		5							
		6							

46-1

10

PLEASE REMIT TO:

US Bank
ABA #: [REDACTED]
Account #: [REDACTED]

46-1 P12

not in PK?

Michelle Doery
Michelle Doery
Manager, Power & Fuels Accounting

ENTERED BY: SHARON PATRIE DATE: 4/22/15
PHONE: (661)691-7887 COMPANY CODE: 1500
AUTHORIZED BY: _____

REQUIRED IF UNDER \$250

SAP DOCUMENT #(S): 1900376590

ACCT NUMBER: 3305000 I/O 6370000482

SOURCE DR #19

205
46-1
1 P10

BUYER: **CONFIDENTIAL**
 FLORIDA POWER & LIGHT CO
 Florida Power & Light Company
 Hedging Activities
 Dkt# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15 A
 Title Invoice

SELLER: B
 [Redacted]

PBC
INVOICE
 Invoice ID: 51764
 Invoice Date: 7/7/15
 Payment Date: 7/27/15
 Delivery Month: 2015-06-01
 Invoice Status: FINAL

TXN #	Buy/Sell	Pipeline	Txn Type	Location	Delivery Date	Volume	Index	Price	Amount
127011	NA	1							
		2							
		3							
		4							
		5							
		6							

PLEASE REMIT TO:
 US Bank
 ABA #: [Redacted]
 Account #: [Redacted]

Michelle Doery
 Michelle Doery
 Manager, Power & Fuel Accounting

ENTERED BY: SHARON PATRIE DATE: 7/21/15
 PHONE: (561)891-7897 COMPANY CODE: 1500
 AUTHORIZED BY: _____
 REQUIRED IF UNDER \$250
 SAP DOCUMENT #(S): 1900394996
 ACCT NUMBER: 3305000 I/06370000482

SOURCE DR #19

46-1 P13

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 46-1/1

[Pages 15 through 28]

Physical Hedging Support

Hedging Audit 2015 – Docket No. 150001
Audit Request No. 3, Part 2

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

9/15/15
g/L
9/15

CONFIDENTIAL

Title DR 3, Part 2
Brokerage Fees

Q: A statement explaining the treatment of transaction costs and brokerage fees...for the period August 1, 2014 – July 31, 2015. Provide the related invoices.

47P-Pr

A: Currently, the only transaction costs incurred by FPL's financial hedging program are Intercontinental Exchange, Inc. (ICE) brokerage charges. Users are charged a monthly

- 1 minimum commission of [REDACTED] which
- 2 includes the market types [REDACTED] Individual user traded commissions are netted against his or her individual monthly minimum commission regardless of the OTC market traded.

Commissions are expensed in the month incurred. These costs flow through account 3305000 to G/L account 2300000 directly and are not included in the FPL Derivative Settlements – All Instruments reports. G/L account 2300000 is the FPL Fuel Inventory account.

SOURCE DR 3, Part 2

47 P1

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

gcl
9/15

9/16

Title Brokerage Fees

**TRANSACTIONS COSTS AND BROKERAGE FEES FOR
THE PERIOD AUGUST 1, 2014-JULY 31, 2015:**

MONTH	AMOUNT	REFERENCE
AUGUST		WP. 47-1 P.1
SEPTEMBER		WP. 47-1 P. 2
OCTOBER		WP. 47-1 P. 3
NOVEMBER		WP. 47-1 P. 4
DECEMBER		WP. 47-1 P. 5
JANUARY		WP. 47-1 P. 6
FEBRUARY		WP. 47-1 P. 7
MARCH		WP. 47-1 P. 8
APRIL		WP. 47-1 P. 9
MAY		WP. 47-1 P. 10
JUNE		WP. 47-1 P.11 SEE INVOICE WP. 47-1 P.12
JULY		WP. 47-1 P. 11 SEE INVOICE WP. 47-1 P.14

Index
x Traced to Invoice

SOURCE AS REFERENCED

all 8/15

Aug-14

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
John Gleber	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Ystra Loutan	Gas
Jerry Yupp	Power/Gas
Jeff Dunn	Power
Paul Zhang	Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	E
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	
[REDACTED]				

47-1P

43-1

A 11/15

Florida Power & Light Company
Hedging Activities
DK# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Brokerage fees

1 [REDACTED]

47P

Index

(A) Name of trader
traced to Appendix A
of the EMT TRADING
AND RISK MANAGEMENT
Procedures Manual
on wp42-3 P1

SOURCE DR3 Part 2

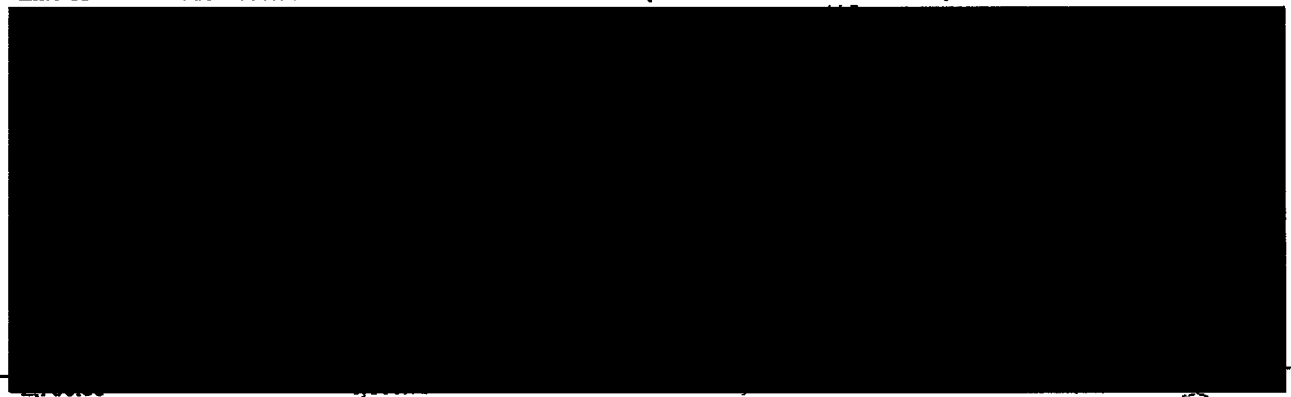
Sep-14

DL 9/15

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
John Gleber	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Yara Loutan	Gas
Ry Yupp	Power/Gas
Jeff Dunn	Power
Paul Zhang	Gas

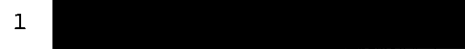
(A)
F
(A)

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E



(43-1)

(A) 47P



(47P)

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Brokerage Fees

SOURCE DL 3 part 2

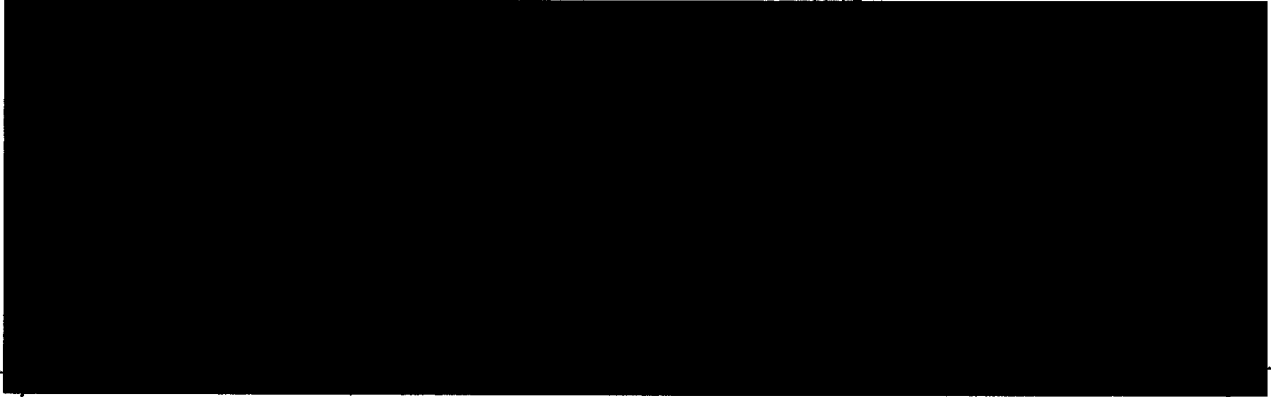
47-1 P.2

9/14/15
 JRC
 9/15

Oct-14

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	E
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
John Gleber	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Christina Loutan	Gas
Harry Yupp	Power/Gas
Jeff Dunn	Power
Paul Zhang	Gas



47-10.3

(A) 4702

(43-1)

(A)



(478)

Florida Power & Light Company
 Hedging Activities
 Dk# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

Title Brokerage Fees

SOURCE DL3, Part 2

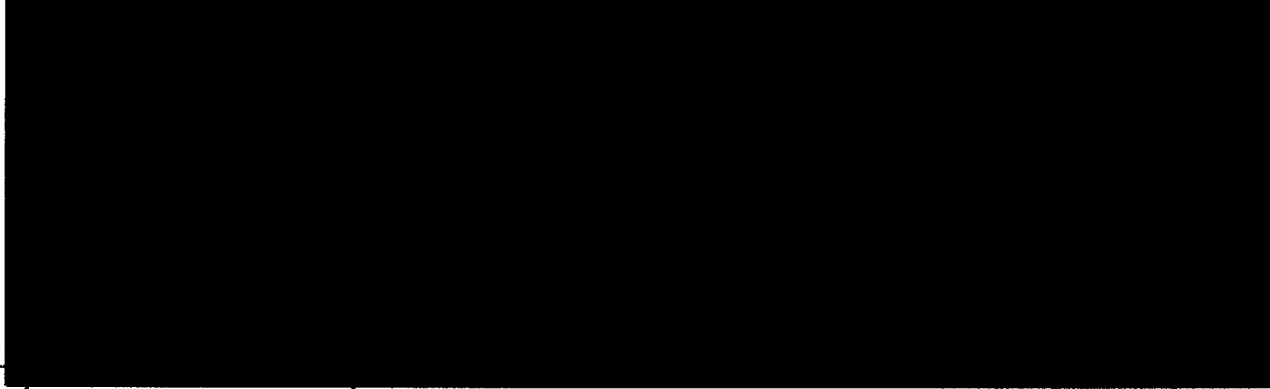
11

9/15/15
 9/15/15
 BYC

Nov-14

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
John Gleber	Gas
Bill Murphy	Gas
Mirellys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Mastra Loutan	Gas
Yry Yupp	Power/Gas
Jeff Dunn	Power
Paul Zhang	Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	TOTAL
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E



43-15

(A)

47P

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Florida Power & Light Company
 Hedging Activities
 DK# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

Title Brokerage Fees

SOURCE DR3, Part 2

47-1 P. U

ALL
PAC
9/11

Dec-14

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E

Art Morris Gas
 Bill Miller Gas
 Shirley Steff Gas
 John Gleber Gas
 Bill Murphy Gas
 Mirielys Nieto Optimization
 Chuck Helber Power/Optimization
 Luther Hall Power
 Jerry Hildreth Optimization
 Raj Iyer Gas
 Lvstra Loutan Gas
 y Yupp Power/Gas
 Jen' Dunn Power
 Paul Zhang Gas

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(N)

(43-1)

(A) 470

Florida Power & Light Company
 Hedging Activities
 DK# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15

Title Brokerage Fees



↓
(470)

SOURCE DL 3, PAGE 2

47-1-P

AKD
D 9/15

Jan-15

G/L 5760220 I/O 612000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirietyls Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Lystra Loutan	Gas
Gerry Yupp	Power/Gas
Dunn	Power
Paul Zhang	Gas

(E)
T
(K)



(43-1)



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(47 p)

FL Power & Light Company
Hedging Activities
DK# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Brokerage Fees

SOURCE DR 3, Part 2

47-101

47 p

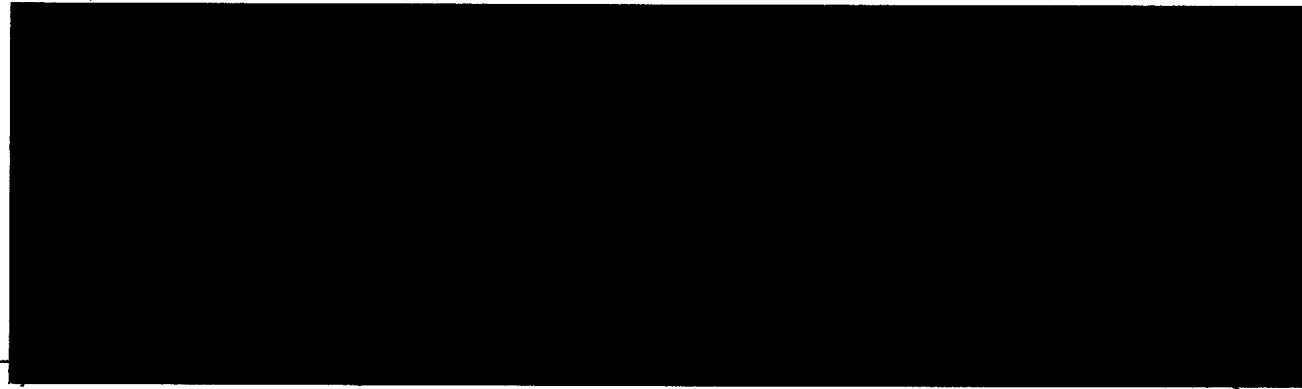
PL

9/15/15
AL
9/15

Feb-15

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer (AL)	Gas
Lystra Loutan (L)	Gas
Gerry Yupp	Power/Gas
Jun	Power
Paul Zhang (AL)	Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	E
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	



47-1 p. 7

(43-1)

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47 p

(A)



(47 p)

Florida Power & Light Company
Hedging Activities
DK# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Brokerage Fees

SOURCE DR 3, Part 2

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60

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Brokerage Fees

Mar-15

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Lystra Loutan	Gas
Gerry Yupp	Power/Gas
Dunn	Power
Karl Zhang	Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	TOTAL
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E



(43-1)

1

(472)

(A)

(A) 472

SOURCE DR 3, Part 2

47-180

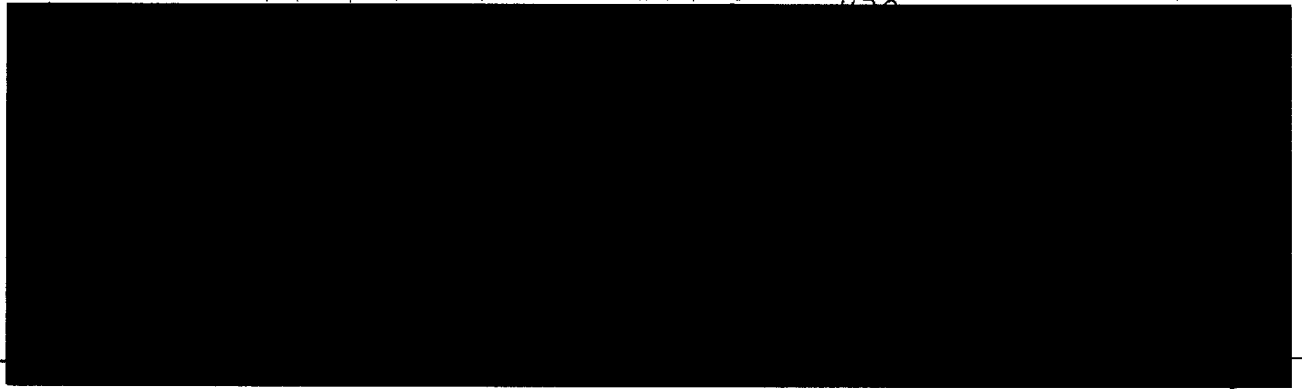
Misc
D.L.
9/11/15

APR 15
 4/15

Apr-15

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Lystra Loutan	Gas
Gerry Yupp	Power/Gas
Dunn	Power
Paul Zhang	Gas



43-1

472

1 [Redacted]

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 472

Florida Power & Light Company
 Hedging Activities
 DK# 150001-EI, ACN 15-051-4-1
 8/1/14 - 7/31/15
 Title Brokerage Fees

SOURCE DR 3, Part 2

47-1 pg

1/1/14
DU
pays

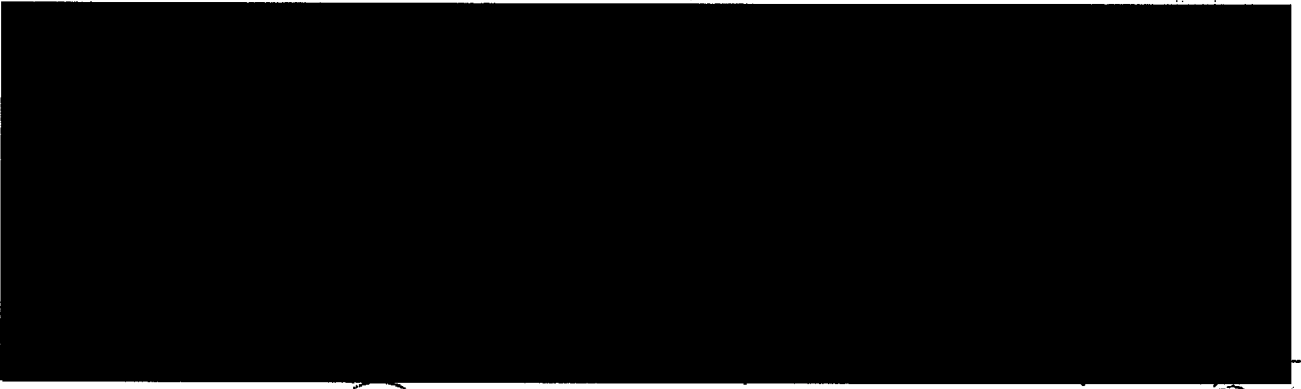
May-15

G/L 5760220 I/O 6120000502 : G/L 3305000 I/O 6370000482 : G/L 5760220 I/O 6120000508 : G/L 5760220 I/O 6120007982

Software Purchases : Accrued Fuel Expense : Software Purchases : Software Purchases : TOTAL
FPL Electricity - EMT A : Gas Purchases - EMT B : FPL Gas Operations C : Optimization D : E

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Lystra Loutan	Gas
ry Yupp	Power/Gas
erf Dunn	Power
Paul Zhang	Gas

(4)
↓
(2)



(43-1)

(A)
47 p

1 [redacted] (A)
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(47 p)

Florida Power & Light Company
Trading Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Brokerage Fees

SOURCE DR 3 part 2

47-10

PBC

CONFIDENTIAL

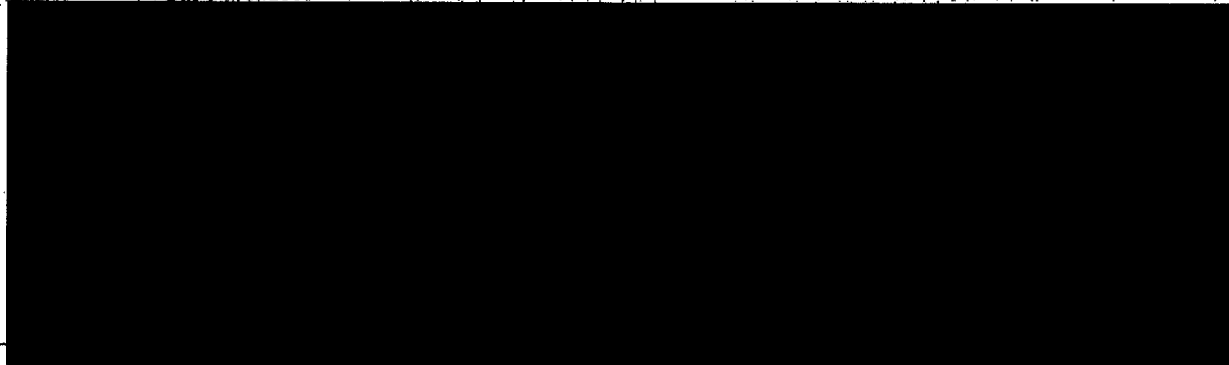
Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

Title Broker's fees

Jun-15

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirelys Nieto	Optimization
Chuck Halber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer (N)	Gas
Lysra Loutan (L)	Gas
Gerry Yupp	Power/Gas
Jeff Dunn	Power
Paul Zhang (N)	Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	TOTAL
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations - C	Optimization - D	E



43-1

47-1 P12

SOURCE Dr 3, Part 2

9/1/15

9/1/15

47-1 P1

Invoices
CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

ICE **PBC**
Monday, June 1, 2015 - Tuesday, June 30, 2015
Account #: 193
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408-1193
Commodity Type: All USD
Invoice Date: July 1, 2015

Title INVOICE
ICE US OTC COMMODITY MARKETS, LLC INVOICE

9/15
9/15

Brokerage	Invoice #	Total Fees
Physical Gas	0615000193008	
OTC Commission Adjustment	0615000193088	
Market Data Exchange Fees - ICE Futures Europe	0615000193005	
Market Data Exchange Fees - ICE Futures U.S.	0615000193087	
Market Data Exchange Fees - ICE Futures Canada	0615000193086	
Market Data Exchange Fees - ICE Endex	0615000193081	
Market Data Exchange Fees - Liffe	0615000193080	
Market Data Exchange Fees - NGX Futures	0615000193088	
Price Server Fees	0615000193083	
Direct Connect Fees	0615000193002	
Commission Total:		
Sales Tax Total:		
Amount Due:		

Please remit the Amount Due within 30 days after the end of the month. Please ensure bank charges are not deducted from the amount due to ICE US OTC Commodity Markets, LLC. Payment should be made in the currency invoiced in one of the following forms:

ICE US OTC Commodity Markets, LLC Taxpayer Identification Number (TIN) 58-2556870
In the form of a check made payable within thirty (30) days to ICE US OTC Commodity Markets, LLC and sent to:
ICE US OTC Commodity Markets, LLC
PO Box 935278
Atlanta, GA 31193-5278
Questions? Contact ICE Accounting for answers - ICEAccounting@THEICE.com

via Wire Transfer or ACH:
Beneficiary Name: ICE US OTC Commodity Markets, LLC
Receiving Bank Name: Wells Fargo
Receiving Bank City and State: Atlanta, Georgia
SWIFT Code #: WFBUS6S
Receiving Bank's ABA #: 121000248
Crediting Account #: 2000048123818

via Credit Card:

Please quote the invoice number when sending your remittance to ensure credit to your account.

Invoices \$10,000 and under can be paid by credit card using the button below.

[Click Here for Credit Card Payments](#)

ENTERED BY: SHARON PATRIE DATE: 7/15/15
PHONE: (681)691-7897 COMPANY CODE: 1500
AUTHORIZED BY: _____

Michelle Doery

REQUIRED IF UNDER \$250

SAP DOCUMENT #(S): 1900394192 Manager: Power & Fuels Accounting

ACCT NUMBER: See Attached for Coding

Florida Power & Light Company
Hedging Activities
DK# 150001-EI, ACN 15-051-4-1
8/1/14 - 7/31/15

PBC

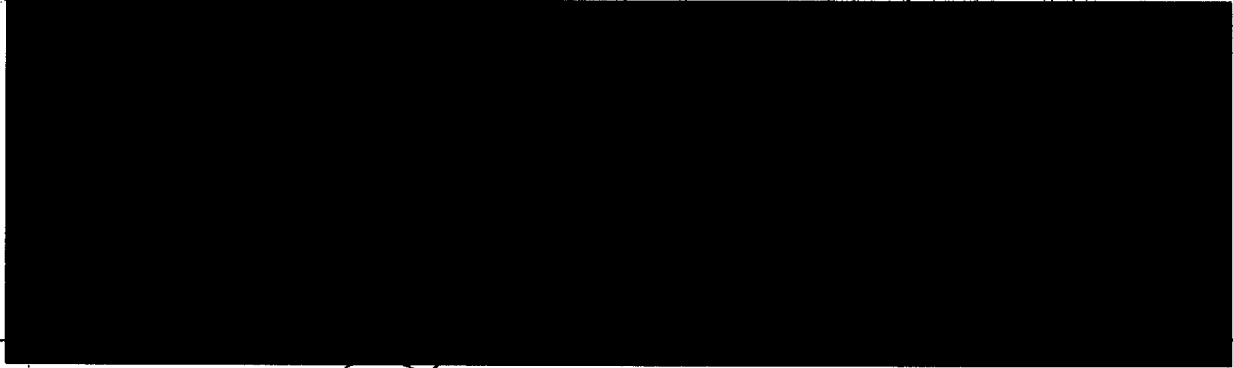
Title Transaction Broker's fees

CONFIDENTIAL

9/15/15
Jul-15

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Lystra Loutan	Gas
Gerry Yupp	Power/Gas
Jeff Dunn	Power
Paul Zhang	Gas

G/L 5760220 I/O 6120000502	G/L 3306000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E



43-17

47-1 P14

SOURCE DR3, part 2

47-1 P12

47-1914

ICE OTC

ICE US OTC COMMODITY MARKETS, LLC INVOICE

Wednesday, July 1, 2015 - Friday, July 31, 2015

Account #: 193
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408 USA

Commodity Type: All USD
Invoice Date: August 1, 2015

Florida Power & Light Company
Hedging Activities
Dkt# 150001-EL, ACN 15-051-4-1
8/1/14 - 7/31/15

INVOICE

Title	Invoice #	Total Fees A
Commission Fees	0715000193006	[REDACTED]
Position Adjustment	0715000193088	
Exchange Fees - ICE Futures Europe	0715000193095	
Exchange Fees - ICE Futures U.S.	0715000193087	
Exchange Fees - ICE Futures Canada	0715000193086	
Exchange Fees - ICE Endex	0715000193081	
Exchange Fees - Liffe	0715000193080	
Exchange Fees - NGX Futures	0715000193098	
Commission Fees	0715000193085	
Commission Fees	0715000193082	

Commission Total:

Sales Tax Total:

Amount Due:

Please remit the Amount Due within 30 days after the end of the month. Please ensure bank charges are not deducted from the amount due to ICE US OTC Commodity Markets, LLC. Payment should be made in the currency invoiced in one of the following forms:

ICE US OTC Commodity Markets, LLC Taxpayer Identification Number (TIN) 58-2555670

In the form of a check made payable within thirty (30) days to ICE US OTC Commodity Markets, LLC and sent to:

ICE US OTC Commodity Markets, LLC
PO Box 935278
Atlanta, GA 31193-5278

via Wire Transfer or ACH:

Beneficiary Name:	ICE US OTC Commodity Markets, LLC
Receiving Bank Name:	Wells Fargo
Receiving Bank City and State:	Atlanta, Georgia
SWIFT Code #:	WFBIUS6S

47-1913

SOURCE DR 3 Part 2

47-1914

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: FPL Hedging Audit
AUDIT CONTROL NO: 15-051-4-1
DOCKET NO: 150001-EI
DATE: October 7, 2015

2-1	Unredacted Filing March 2015	5	Y	Pgs. 1-5, Cols. C-F, Lns. 4-9	(e)	G. Yupp
2-2	Unredacted Filing August 2015	10	Y	Pgs. 1-7, Cols. C-F, Lns. 4-8 Pg. 8, Col C-E, Lns. 4-8 Col. F, Lns. 4-7 Pg. 9, Line 1 Cols. C-F, except Line 2 Col. M Pg. 10, Cols. C-F, except Line 1	(d), (e)	G. Yupp
9	List of Internal Audits	4	Y	Pg. 1, Lns. 1A-8A, 10A-16A, 18A, 19, 20A, 20B Pg. 2, Lns. 21A-27A, 28, 29A-30A, 31, 32, 33A-40A, 41 Pg. 3, Lns. 42A, 43A, 43B, 44A-60A Pg. 4, Lns. 1A-2A, 4A-7A, 7B, 8A- 12A, 13, 14A, 15A, 16, 17	(b)	A. Maceo
42-1	FPL 2015 Risk Management Plan	7	N Y Y N	Pgs. 1-4 Pg. 5, Lns. 1A, 2A, 3A, 4A, 5A, 6, 7 Pg. 6, Lns. 1A, 2A, 2B Pg. 7	(e)	G. Yupp
42-3	EMT trading and Risk Management Plan 2014	2	Y	Pg. 1, Lns. 1-7 Cols. A-B Pg. 2, Line 1 Col. A	(e)	G. Yupp
42-3/1	EMT Procedures Manual Summary	1	N			
42-4	Sarbanes Oxley 404 Compliance	1	Y	Lns. 1A, 2-10	(e)	G. Yupp
42-5	Personnel explanation	1	N			

43-1	Reconciliation to the Filing	1	Y	Cols. A-E, except Line 1D	(e)	G. Yupp
43-2	List of Counterparties December 2014 and May 2015	2	Y	Pgs. 1-2, Cols. A-C	(d), (e)	G. Yupp
43-3	Derivatives Report for December 2014 and May 2015	18	Y	ALL	(d), (e)	G. Yupp
43-3/1	Invoices and Purchase Statements	11	Y	Pg. 1, Cols. A-C Lns. 1-4 Pg. 2, Cols. A-N Line 1 Pg. 3, Cols. A-B Lns. 1-3 Pg. 4, Cols. A-K Pg. 5, Cols. A-I Pg. 6, Cols. A-C Lns. 1-2 Pg. 7, Cols. A-H Pg. 8, Col. A Line 1 Pg. 9, Col. A, except Line 1 Cols. B-K Pg. 10, Col. A, except Line 1 Col. B Pg. 11, Col. A, except Line 1 Cols. B-I	(d), (e)	G. Yupp
43-3/2	List of Confirmation Notices	1	Y	Col. A, Line 1 Cols. B-E	(d), (e)	G. Yupp
43-5	Monthly Gas Closing Report	3	Y N Y	Pg. 1, Cols. A-G Line 1 Pg. 2 Pg. 3, Col. A, except Line 1 Col. B	(d), (e)	G. Yupp
43-6	Monthly Gas Closing Report	3	Y	Pg. 1, Cols. A-J Line 1 Pg. 2, Col. A, except Line 1 Cols. B-D Pg. 3, Lns. 1-4, except Col. A	(d), (e)	G. Yupp

43-7	Statement on Tolling Arrangements	1	Y	Lns. 1A, 2A, 3A	(d)	G. Yupp
43-8	Statement on Affiliate Companies	1	N			
43-9	Statement on Lehman Brothers	1	N			
45-1	Planned Position Strategy	8	Y Y N	Pgs. 1-6, ALL Pg. 7, Cols. A-G Pg. 8	(e)	G. Yupp
45-1/1	Fuel Burn Summaries	12	Y	ALL	(e)	G. Yupp
46-1	Physical Hedging	11 (pgs. 1-11 of 12)	N Y	Pg. 1 Pgs. 2-11, Lns. 1-2	(d), (e)	G. Yupp
46-1 ¹	Recalculation of Physical Hedging Loss for March 2015	1 (pg. 12 of 12)	Y	Cols. A-C Line 1 Col. D, Lns. 1-3	(d), (e)	G. Yupp
46-1/1	Physical Hedging Support	28	Y Y Y Y Y Y N Y N Y Y N Y	Pg. 1, Lns. 1-2 Pg. 2, Lns. 1-4 Pg. 3, Lns. 1-2 Pg. 4, Lns. 1-4 Col. A Pg. 5, Lns. 1A, 2, 3A, 4-6 Col. A Pg. 6, Cols. A-F Line 1A Pgs. 7-9 Pg. 10, Cols. A-C Lns. 1-6 Pg. 11 Pg. 12, Cols. A-F Line 1A Pg. 13, Cols. A-C Lns. 1-6 Pg. 14 Pgs. 15- 28, ALL	(d), (e)	G. Yupp

¹ The FPSC auditors' original index reflects two work papers numbered 46-1.

47	Transaction Costs and Brokerage Fees	1	Y	Lns. 1A, 2A	(d)	G. Yupp
47	List of Transaction Costs and Brokerage Fees	1	Y	Col. A	(d)	G. Yupp
47-1	Breakdown of Transaction Costs and invoices	14	Y	Pgs. 1-10, Cols. A-E Line 1 Pg. 11, Cols. A-E Pg. 12, Col. A Pg. 13, Cols. A-E Pg. 14, Col. A	(d)	G. Yupp

EXHIBIT D

AFFIDAVITS

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)
MIAMI-DADE COUNTY)

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 Exhibit C, and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information Obtained in Connection with Audit No. 15-051-4-1, 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, reports or notes of internal auditors, or information relating to internal auditing reports issued in 2014. 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 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.

[Signature of Antonio Maceo]
Antonio Maceo

SWORN TO AND SUBSCRIBED before me this 5th day of October 2015, by Antonio Maceo, who is personally known to me and who did take an oath.

[Signature of Carolyn J. Smith]
Notary Public, State of Florida

My Commission Expires:
:3051684



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 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 Exhibit C, and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information Obtained in Connection with Audit No. 15-051-4-1. 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 contractual data such as pricing and other terms, which allow FPL to hedge its fuel purchases on favorable terms for FPL and its customers. The disclosure of this 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.

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. The information contains monthly realized values for FPL's hedge positions and resulting impact on the cost of natural gas. The disclosure of this information would impair the efforts of FPL to contract for these procurement and hedging 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.

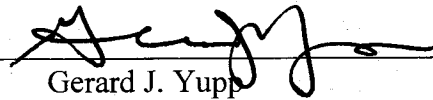
4. The documents or materials also contain the names of financial counterparties with which FPL executes hedging transactions. Due to the extremely limited population of potential counterparties that participate in this market, the disclosure of this data would harm the competitive business of FPL and 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. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 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.

7. Affiant says nothing further.



Gerard J. Yupp

SWORN TO AND SUBSCRIBED before me this 6th day of October 2015, by Gerard J. Yupp, who is personally known to me and who did take an oath.



Notary Public, State of Florida

My Commission Expires:

