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April 22, 2016

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED-FPSC
2016 APR 22 PM 1:48
COMMISSION
CLERK

Re: Docket No. 160001-EI

REDACTED

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in Response to Staff's First Set of Interrogatories (Nos. 1, 12 and 25). The request includes Exhibits A, B (two copies), C and D.

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

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

Sincerely,

Maria J. Moncada

Enclosure

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

- COM
- AFD Redacted
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- TEL _____
- CLK _____

4084800

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 160001-EI

Date: April 22, 2016

**FLORIDA POWER & LIGHT COMPANY'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
PROVIDED IN RESPONSE TO STAFF OF THE FLORIDA PUBLIC
SERVICE COMMISSION'S FIRST SET OF INTERROGATORIES (Nos. 1, 12 and 25)**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain information provided in response to the Staff of the Florida Public Service Commission's ("Staff") First Set of Interrogatories (Nos. 1, 12 and 25) ("Confidential Discovery Responses"). In support of its Request, FPL states as follows:

1. On March 23, 2016, Staff served its First Set of Interrogatories (Nos. 1-25) on FPL. FPL's Response to Staff's First Set of Interrogatories (Nos. 1, 12 and 25) contain information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's First Set of Interrogatories (Nos. 1-25) on April 22, 2016. This request is being filed contemporaneously with the service of the responses to Staff's discovery in order to request confidential classification of the Confidential Discovery Responses consistent with Rule 25-22.006, Florida Administrative Code.

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

a. Exhibit A consists of a copy of the Confidential Discovery Responses on which all information that FPL asserts is entitled to confidential treatment is highlighted.

b. Exhibit B consists of an edited version of the Confidential Discovery Responses on which all information that FPL asserts is entitled to confidential treatment is redacted.

c. Exhibit C is a table containing a page-and-line identification of the information highlighted in Exhibit A and a brief description of the Confidential Information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarant who supports the requested classification.

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

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

5. As the description included in Exhibit C and the declaration included in Exhibit D indicate, the Confidential Discovery Responses provided by FPL contains information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

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

7. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for

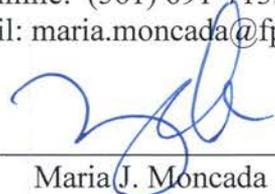
at least an additional eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

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,

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By: _____



Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE

Docket No. 160001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification has been furnished by electronic service this 22nd day of April 2016 to the following:

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By: _____



Maria J. Moncada
Florida Bar No. 0773301

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

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EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

Q.

For each Request for Proposal (RFP) for coal issued in 2015 by or on behalf of FPL, list the bids received. For each bid, include the supplier, tonnage bid, coal quality, and delivered price information, as well as the method and route of delivery.

A.

METHOD AND ROUTE OF DELIVERY

Scherer burns Powder River Basin (PRB) coal delivered to the plant exclusively by rail. The mines in the PRB are served by either the BNSF Railway (BNSF) or the Union Pacific Railroad Company (UP). BNSF and UP haul the coal from mine origin to Memphis, Tennessee where the trains are interchanged for final delivery by the Norfolk Southern Railway Company (NS).

SJRPP burns domestic and foreign coal. Domestic coal is delivered to SJRPP by CSX Transportation, Inc. (CSXT) primarily from coal mines in the Illinois Basin. Foreign coal is delivered to the St. Johns River Coal Terminal (SJRCT) in ocean-going barges and vessels.

RFP'S ISSUED FOR COAL IN 2015

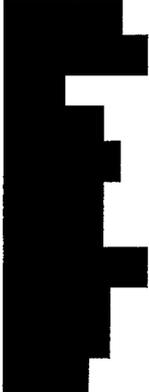
SCHERER

Six (6) RFP's were issued.

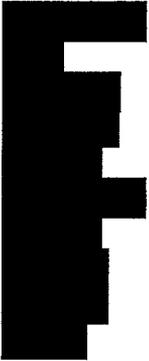
1. February Spot solicitation for 2Q15

SUPPLIER	TONNAGE	QUALITY	DELIVERED PRICE	
A	TOTAL	BTU/LB	\$/TON	\$/mmbtu
	45,000	8,800	40.29	2.289
	135,000	8,400	38.91	2.316
	90,000	8,400	38.95	2.318
	135,000	8,400	39.22	2.334
	135,000	8,850	41.47	2.343
	135,000	8,550	40.57	2.372

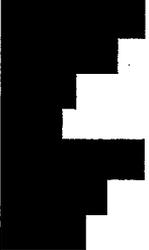
A 2. (a) April Spot Solicitation for May, June & 3Q15

	180,000	8,800	39.37	2.237
	313,000	8,850	39.65	2.240
	1,000,000	8,850	39.70	2.243
	45,000	8,400	37.72	2.245
	1,000,000	8,400	37.84	2.253
	45,000	8,400	37.93	2.258
	45,000	8,400	38.15	2.271
	313,000	8,400	38.20	2.274
	1,000,000	8,800	40.44	2.298
	1,000,000	8,550	39.37	2.302
200,000	9,400	45.73	2.433	

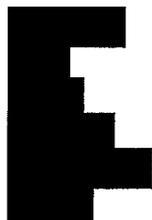
2. (b) April Spot Solicitation for 4Q15

	188,000	8,850	39.65	2.240
	600,000	8,850	39.70	2.243
	180,000	8,800	39.49	2.244
	600,000	8,400	37.84	2.253
	90,000	8,800	40.02	2.274
	188,000	8,400	38.20	2.274
	225,000	8,400	38.58	2.296
	600,000	8,800	40.44	2.298
	600,000	8,550	39.37	2.303
	120,000	9,400	45.73	2.433

3. (a) August Spot Solicitation for 4Q15

	300,000	8,850	40.40	2.283
	300,000	8,400	38.44	2.288
	150,000	8,350	38.41	2.300
	300,000	8,850	40.78	2.304
	300,000	8,400	39.07	2.325
	135,000	8,800	41.46	2.356
	120,000	9,400	46.22	2.459

A 3. (b) August Spot Solicitation for 1Q16

	900,000	8,400	38.60	2.298
	300,000	8,850	40.78	2.304
	225,000	8,350	38.63	2.313
	900,000	8,800	40.93	2.326
	900,000	8,400	39.33	2.341
	120,000	9,400	46.22	2.459

4. (a) December Spot Solicitation for 1Q16

	450,000	8,600	38.17	2.219
	450,000	8,400	37.31	2.221
	450,000	8,850	39.52	2.233
	450,000	8,850	38.52	2.233
	450,000	8,400	37.56	2.236
	150,000	8,350	37.37	2.237
	225,000	8,800	39.47	2.242
	450,000	8,800	39.51	2.245
	450,000	8,400	38.18	2.272

4. (b) December Spot Solicitation for 2Q16

	450,000	8,600	38.17	2.219
	450,000	8,400	37.31	2.221
	450,000	8,850	39.52	2.233
	450,000	8,850	39.52	2.233
	450,000	8,400	37.56	2.236
	225,000	8,800	39.47	2.242
	450,000	8,800	39.51	2.245
	450,000	8,400	38.18	2.272

A 5. April Long Term Solicitation

█	2,000,000	9,400	47.12	2.506	2016
	2,000,000	9,400	48.35	2.572	2017
	2,000,000	9,400	49.61	2.639	2018
	2,000,000	9,400	50.88	2.707	2019
	2,000,000	9,400	52.18	2.775	2020
█	3,000,000	8,800	42.53	2.416	2016
	3,000,000	8,800	43.74	2.485	2017
	3,000,000	8,800	44.97	2.555	2018
	3,000,000	8,800	46.22	2.626	2019
	3,000,000	8,800	47.48	2.698	2020
█	5,000,000	8,800	42.21	2.398	2016
	5,000,000	8,800	43.42	2.467	2017
	5,000,000	8,800	44.65	2.537	2018
	5,000,000	8,800	45.89	2.608	2019
	5,000,000	8,800	47.16	2.679	2020
█	8,000,000	8,800	41.94	2.383	2016
	8,000,000	8,800	43.15	2.452	2017
	8,000,000	8,800	44.38	2.522	2018
	8,000,000	8,800	45.63	2.592	2019
	8,000,000	8,800	46.89	2.664	2020
█	3,000,000	8,800	41.94	2.383	2016
	3,000,000	8,800	43.95	2.497	2017
	3,000,000	8,800	45.77	2.601	2018
	3,000,000	8,800	47.55	2.702	2019
	3,000,000	8,800	49.35	2.804	2020
█	8,000,000	8,850	41.95	2.370	2016
	8,000,000	8,850	43.80	2.475	2017
	8,000,000	8,850	45.68	2.581	2018
█	3,000,000	8,400	40.08	2.386	2016
	3,000,000	8,400	41.72	2.483	2017
	3,000,000	8,400	43.43	2.585	2018

Florida Power & Light Company
Docket No. 160001-EI
Staff's 1st Set of Interrogatories
Interrogatory No. 1
Page 5 of 9

A

█	2,000,000	8,700	40.88	2.349	2016
	2,000,000	8,700	42.73	2.456	2017
	2,000,000	8,700	44.61	2.564	2018
█	8,000,000	8,850	41.90	2.367	2016
	8,000,000	8,850	43.80	2.475	2017
	6,000,000	8,850	45.57	2.575	2018
	4,000,000	8,850	47.24	2.669	2019
	4,000,000	8,850	48.83	2.759	2020
█	3,000,000	8,400	40.02	2.382	2016
	4,000,000	8,400	41.72	2.483	2017
	2,000,000	8,400	43.32	2.597	2018
	2,000,000	8,400	45.16	2.688	2019
	2,000,000	8,400	46.69	2.779	2020
█	2,000,000	8,700	40.83	2.346	2016
	2,000,000	8,700	42.73	2.456	2017
	2,000,000	8,700	44.50	2.557	2018
	2,000,000	8,700	46.17	2.654	2019
	2,000,000	8,700	47.76	2.745	2020
█	1,000,000	8,350	41.06	2.459	2017
	1,500,000	8,350	42.40	2.539	2018
█	500,000	8,600	40.92	2.379	2016
█	540,000	8,800	42.43	2.411	2016
█	180,000	8,800	41.89	2.380	2016
█	1,500,000	8,800	42.53	2.415	2016
	2,000,000	8,800	44.55	2.531	2017
	2,000,000	8,800	46.31	2.631	2018
█	1,500,000	8,800	42.53	2.417	2016
	2,000,000	8,800	44.55	2.531	2017
	2,000,000	8,800	46.31	2.631	2018
	2,000,000	8,800	47.56	2.702	2019
	2,000,000	8,800	49.36	2.805	2020

Florida Power & Light Company
Docket No. 160001-EI
Staff's 1st Set of Interrogatories
Interrogatory No. 1
Page 6 of 9

A

[REDACTED]	1,000,000	8,400	39.59	2.357	2016
	2,000,000	8,400	41.55	2.473	2017
[REDACTED]	2,000,000	8,400	43.64	2.598	2018
	1,000,000	8,400	39.59	2.357	2016
[REDACTED]	2,000,000	8,400	41.55	2.473	2017
	2,000,000	8,400	43.64	2.598	2018
[REDACTED]	2,000,000	8,400	45.69	2.720	2019
	2,000,000	8,400	47.33	2.817	2020
[REDACTED]	4,000,000	8,400	40.31	2.399	2016
	4,000,000	8,400	41.97	2.498	2017
[REDACTED]	4,000,000	8,400	43.88	2.612	2018
	4,000,000	8,400	45.80	2.726	2019
[REDACTED]	4,000,000	8,400	47.74	2.842	2020
	4,000,000	8,400	40.09	2.386	2016
[REDACTED]	4,000,000	8,400	41.74	2.485	2017
	4,000,000	8,400	43.63	2.597	2018
[REDACTED]	4,000,000	8,400	45.52	2.710	2019
	4,000,000	8,400	47.44	2.824	2020
[REDACTED]	4,000,000	8,400	39.77	2.367	2016
	4,000,000	8,400	41.63	2.478	2017
[REDACTED]	4,000,000	8,400	43.50	2.589	2018
	4,000,000	8,400	45.39	2.702	2019
[REDACTED]	4,000,000	8,400	47.29	2.815	2020
	4,000,000	8,400	40.31	2.399	2016
[REDACTED]	4,000,000	8,400	41.97	2.498	2017
	4,000,000	8,400	43.88	2.612	2018
[REDACTED]	4,000,000	8,400	45.80	2.726	2019
	4,000,000	8,400	47.74	2.842	2020
[REDACTED]	4,000,000	8,400	40.09	2.386	2016
	4,000,000	8,400	41.74	2.485	2017
[REDACTED]	4,000,000	8,400	43.63	2.597	2018
	4,000,000	8,400	45.52	2.710	2019
[REDACTED]	4,000,000	8,400	47.44	2.824	2020

Florida Power & Light Company
Docket No. 160001-EI
Staff's 1st Set of Interrogatories
Interrogatory No. 1
Page 7 of 9

A

██████████	4,000,000	8,400	39.77	2.367	2016
	4,000,000	8,400	41.63	2.478	2017
	4,000,000	8,400	43.50	2.589	2018
	4,000,000	8,400	45.39	2.702	2019
	4,000,000	8,400	47.29	2.815	2020
██████████	4,000,000	8,400	40.31	2.399	2016
	4,000,000	8,400	41.97	2.498	2017
	4,000,000	8,400	44.20	2.631	2018
██████████	4,000,000	8,400	40.09	2.386	2016
	4,000,000	8,400	41.74	2.485	2017
	4,000,000	8,400	43.95	2.616	2018
██████████	4,000,000	8,400	39.77	2.367	2016
	4,000,000	8,400	41.63	2.478	2017
	4,000,000	8,400	43.82	2.608	2018

6. September Long Term Solicitation

██████████	4,000,000	8,850	42.82	2.419	2016
	7,000,000	8,850	44.50	2.514	2017
	7,000,000	8,850	46.09	2.604	2018
	7,000,000	8,850	47.65	2.692	2019
██████████	2,000,000	8,700	41.86	2.406	2016
	2,000,000	8,700	43.54	2.502	2017
	2,000,000	8,700	45.13	2.594	2018
	2,000,000	8,700	46.69	2.683	2019
██████████	2,000,000	8,400	41.01	2.441	2016
	3,500,000	8,400	42.42	2.525	2017
	4,000,000	8,400	44.17	2.629	2018
	4,000,000	8,400	45.51	2.709	2019
██████████	3,000,000	8,400	40.81	2.429	2016
	7,000,000	8,400	42.27	2.516	2017
	7,000,000	8,400	43.97	2.617	2018
	7,000,000	8,400	45.63	2.716	2019

Florida Power & Light Company
Docket No. 160001-EI
Staff's 1st Set of Interrogatories
Interrogatory No. 1
Page 8 of 9

A

[REDACTED]	3,000,000	8,400	40.70	2.423	2016
	7,000,000	8,400	42.16	2.519	2017
	7,000,000	8,400	43.86	2.611	2018
	7,000,000	8,400	45.52	2.710	2019
[REDACTED]	1,500,000	8,400	40.59	2.416	2016
	3,500,000	8,400	42.06	2.503	2017
	3,500,000	8,400	43.76	2.604	2018
	3,500,000	8,400	45.42	2.703	2019
[REDACTED]	500,000	8,850	42.82	2.419	2016
	1,000,000	8,850	44.50	2.514	2017
	2,000,000	8,850	46.41	2.622	2018
	2,000,000	8,850	48.23	2.725	2019
[REDACTED]	500,000	8,850	42.82	2.419	2016
	1,000,000	8,850	44.50	2.514	2017
	1,000,000	8,850	45.88	2.607	2018
	1,000,000	8,850	47.65	2.707	2019
[REDACTED]	1,000,000	8,400	41.16	2.450	2016
	1,000,000	8,400	42.41	2.525	2017
	2,000,000	8,400	44.22	2.632	2018
	2,000,000	8,400	45.99	2.737	2019
[REDACTED]	1,000,000	8,400	41.16	2.450	2016
	1,000,000	8,400	42.41	2.525	2017
	1,000,000	8,400	44.06	2.622	2018
	1,000,000	8,400	45.51	2.709	2019
[REDACTED]	3,000,000	8,800	43.03	2.445	2016
	7,000,000	8,800	44.81	2.546	2017
	7,000,000	8,800	46.62	2.649	2018
	7,000,000	8,800	48.17	2.737	2019
[REDACTED]	3,000,000	8,600	41.05	2.386	2016
	7,000,000	8,600	42.83	2.490	2017
	7,000,000	8,600	44.64	2.595	2018
	7,000,000	8,600	46.19	2.686	2019

Florida Power & Light Company
Docket No. 160001-EI
Staff's 1st Set of Interrogatories
Interrogatory No. 1
Page 9 of 9

A

██████████	3,000,000	8,800	42.92	2.439	2016
	7,000,000	8,800	44.71	2.540	2017
	7,000,000	8,800	46.51	2.643	2018
	7,000,000	8,800	48.07	2.731	2019
██████████	3,000,000	8,400	40.62	2.418	2016
	7,000,000	8,400	42.41	2.524	2017
	7,000,000	8,400	44.21	2.632	2018
	7,000,000	8,400	45.77	2.724	2019
██████████	0	8,350	0	0	2016
	1,000,000	8,350	41.66	2.494	2017
	3,000,000	8,350	43.41	2.599	2018
	3,000,000	8,350	44.69	2.676	2019
██████████	0	8,600	0	0	2016
	500,000	8,600	42.94	2.496	2017
██████████	1,000,000	9,400	48.59	2.584	2016
	1,000,000	9,400	49.86	2.652	2017
	1,000,000	9,400	51.16	2.721	2018
	1,000,000	9,400	52.47	2.791	2019
██████████	360,000	8,750	42.75	2.443	2016
	360,000	8,750	44.50	2.543	2017

SJRPP

No RFP's were issued. FPL had sufficient inventory and quantities of coal contracted for delivery during 2015. No additional coal purchases were required.

CEDAR BAY

No RFP's were issued.

Q.

For interrogatories 12 through 14, please refer to specific portions of the Direct Testimony of Gerard J. Yupp, filed on March 2, 2016.

Please refer to page 4 of the Direct Testimony of Gerard J. Yupp, filed on March 2, 2016. Provide an explanation and details for the Asset Management Agreement referenced in line 22.

A.

The Asset Management Agreement (AMA) referenced in witness Yupp's testimony, filed on March 2, 2016, consisted of five separate agreements. For each of them, FPL analyzed the appropriate structure of the AMA by evaluating the volume and location of its existing (longer-term) natural gas purchases versus its overall projected natural gas consumption under varying scenarios, to determine the optimal level of upstream capacity that could be released and the optimal number of instances that the capacity could be recalled in order to obtain the greatest level of benefits for customers. While the opportunity for this type of sale is limited due to FPL's high utilization of its firm natural gas transportation, FPL was able to structure the AMA to deliver value to FPL's customers while maintaining the reliability of natural gas supply. The revenues received from the replacement shipper benefitted customers by reducing overall natural gas expenses.

Details of these five agreements are listed below:

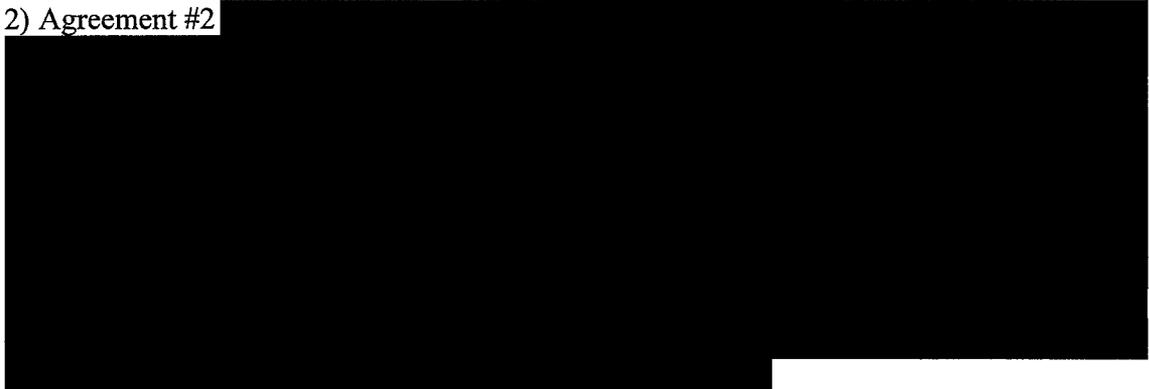
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1) Agreement #1



1 2) Agreement #2

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12 3) Agreement #3

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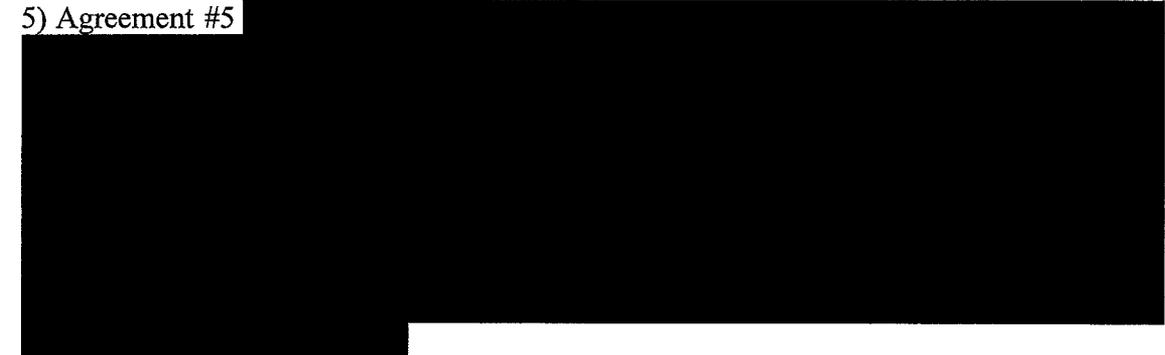
24 4) Agreement #4

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1 5) Agreement #5

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These five agreements produced customer savings in 2015 as listed in Column 7 of Exhibit GJY-1, attached to the Direct Testimony of Gerard J. Yupp, filed on March 2, 2016.

Q.

Please refer to Page 3 of Exhibit GJY-1, exhibit attached to the Direct Testimony of Gerard J. Yupp (Asset Optimization Detail) to answer the following:

a. Please describe the activities for column 5 – Natural Gas Option Premiums.

b. Please describe the activities for column 6 – Natural Gas Storage Options.

A.

a. FPL's natural gas procurement strategy utilizes a mixture of term, month-ahead and daily gas purchases. Given the size of FPL's natural gas portfolio, procurement must be spread across these three categories to ensure that a reliable supply, in sufficient quantities to match demand, is delivered each day. When determining the appropriate amount of volume to purchase within each category, FPL takes into account numerous factors, including projected consumption (including maximum and minimum daily consumption projections), seasonality, market liquidity, and operational constraints. There is a certain amount of price risk inherent in FPL's procurement strategy because of the unpredictable relationship among term, monthly and daily settlement prices.^A

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[Redacted]

[Redacted]

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 160001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause
SUBJECT: FPL's Responses to Staff's 1st Set of Interrogatories Nos. 1, 12 and 25
DATE: April 22, 2016

Staff's 1st Interrog. (No.)	Pgs.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsec.	Declarant
1	1-9	Requests for Proposal bids for coal received by FPL	Pgs. 1-9, Col. A	(d), (e)	G. Yupp
12	1-3	Asset Management Agreement Details	Pg. 1, Lns. 1 (after "Agreement #1"), 2-12 Pg. 2, Lns. 1 (after "Agreement #2"), 2-11, 12 (after "Agreement #3"), 13-23, 24 (after "Agreement #4"), 25-34 Pg. 3, Lns. 1 (after "Agreement #5"), 2-10	(d), (e)	G. Yupp
25	1 of 2	Asset Optimization Detail / Natural Gas Option Premiums	Pg. 1, Lns. 1A-18	(d), (e)	G. Yupp

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 160001-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

DECLARATION OF GERARD J. YUPP

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

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business concerns bids and other contractual data, the public disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the documents contain information regarding FPL's natural gas and coal suppliers, including purchase volumes, quality, pricing, and delivery methods. Additionally, this information relates to competitive interests of FPL and of suppliers from whom FPL purchases fossil fuels. The documents also contain financial details related to FPL's asset optimization activities for natural gas and electric transmission. The disclosure of this information would impair FPL's ability to execute transactions for natural gas commodity sales, natural gas storage, natural gas transportation, and electricity transmission on favorable terms for the benefit of its customers, would impair the competitive interests of FPL and its vendors, and would place FPL at a competitive disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.


GERARD J. YUPP

Date: 4/20/16