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May 24, 2016

VIA HAND DELIVERY

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

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COMMISSION
CLERK

Re: Docket No. 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 Office of Public Counsel's First Set of Interrogatories (Nos. 5 and 7). 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.

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

Sincerely,

Maria J. Moncada

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

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: May 24, 2016

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO
OFFICE OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES (Nos. 5 and 7)**

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 Office of Public Counsel's ("OPC") First Set of Interrogatories (Nos. 5 and 7) ("Confidential Discovery Responses"). In support of its Request, FPL states as follows:

1. On April 21, 2016, OPC served its First Set of Interrogatories (Nos. 1-10) on FPL. FPL's Response to OPC's First Set of Interrogatories (Nos. 5 and 7) contain information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to OPC's First Set of Interrogatories (Nos. 1-10) on May 23, 2016. This request is being filed 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 described more fully in the declaration included as Exhibit D, 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

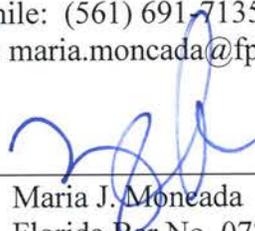
at least an additional eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. See § 366.093(4), Fla. Stat.

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 24th day of May 2016 to the following:

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By:



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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

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

Q. What is the average length of the Company's current natural gas hedging contracts?

A. The data in this answer includes both financial and physical hedges. The answer may need to be modified when the Florida Supreme Court's order in Docket SC15-95 becomes final.

FPL currently does not financially hedge its projected natural gas requirements beyond the end of the subsequent calendar year from the year in which hedges are being placed. For example, in 2016, FPL will not financially hedge its projected natural gas requirements beyond the end of calendar year 2017. However, FPL executes financial hedging contracts for various periods within the year. A contract may be executed for a period as short as one month or as long as one year. The actual "average period of hedge" is included in the hedging results submitted each year in the annual Final True-up Filing and year-to-date Fuel Hedging Activity Report. During the seven year period from 2009 to 2015, the average period of hedge for financially hedged natural gas ranged from [REDACTED].^A The average length of future financial hedging contracts is expected to be consistent with historical averages. The average period of hedge for current physical natural gas hedging activity is 50 years.

Q.

Based upon the Company's Risk Management Plans and forecasted generation needs,

- a. What percentage of the projected natural gas burn for 2016 has been hedged?
- b. What percentage, if any, of the projected natural gas burn for 2017 has been hedged?
- c. What percentage, if any, of the projected natural gas burn for 2018 has been hedged?
- d. What percentage, if any, of the projected natural gas burn for 2019 has been hedged?
- e. What percentage, if any, of the projected natural gas burn for 2020 has been hedged?

A.

The data in this answer includes both financial and physical hedges. The answer may need to be modified when the Florida Supreme Court's order in Docket SC15-95 becomes final.

- 1 a. At the time FPL finished placing its hedges for 2016; approximately [REDACTED]_A of its projected 2016 natural gas consumption was hedged.
- 2 b. Currently, FPL has hedged approximately [REDACTED]_A of its projected 2017 natural gas consumption.
- 3 c. FPL has not executed any financial hedges for 2018. While no official natural gas burn projection has been established, current projected physical hedging volumes are estimated to represent approximately [REDACTED]_A of projected natural gas consumption for the period.
- 4 d. FPL has not executed any financial hedges for 2019. While no official natural gas burn projection has been established, current projected physical hedging volumes are estimated to represent approximately [REDACTED]_A of projected natural gas consumption for the period.
- 5 e. FPL has not executed any financial hedges for 2020. While no official natural gas burn projection has been established, current projected physical hedging volumes are estimated to represent approximately [REDACTED]_A of projected natural gas consumption for the period.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
DOCKET NO: 160001-EI
DATE: May 24, 2016

OPC's 1st Interrog (No.)	Pg Nos	Description	Line No/ Col. No	Florida Statute 366.093(3) Subsection	Declarant
5	1	Gas Hedging Contracts	Line 1A	(d), (e)	G. Yupp
7	1	Risk Management Plans and forecasted generation needs	Lns. 1A, 2A, 3A, 4A, 5A	(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

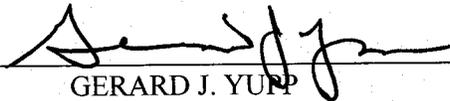
STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) **DECLARATION OF GERARD J. YUPP**

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 information consist of the details of FPL's strategy and plans for hedging natural gas in 2016 and beyond. Additionally, the confidential information relates to competitive interests and hedging-related bids or other contractual data, the disclosure of which would impair the competitive business as well as the efforts of FPL to contract for goods and services on favorable terms, also to the detriment of FPL and its customers. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

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

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


GERARD J. YUPP

Date: 5/19/16