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August 4, 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 AUG -4 AM 10:57
COMMISSION
CLERK

Re: Docket No. 160001-EI

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Certain Information Contained in its 2017 Risk Management Plan, which is Appendix V (Exhibit GJY-5) to FPL's 2016 actual/estimated true-up petition in this docket. 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 for Confidential Classification.

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

REDACTED

Sincerely,

Maria J. Moncada

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CLK _____

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
Filed: August 4, 2016

**FLORIDA POWER AND LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
CERTAIN INFORMATION ON FPL'S 2017 RISK MANAGEMENT PLAN**

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 (the "Confidential Information") contained in FPL's 2017 Risk Management Plan ("Hedging Plan"), which is Appendix V (Exhibit GJY-5) to the 2016 actual/estimated true-up petition that is being filed in this docket on August 4, 2016. In support of its Request, FPL states as follows:

1. FPL is filing its 2017 Hedging Plan as Appendix V (Exhibit GJY-5) to the 2016 actual/estimated true-up petition contemporaneously with this request. Portions of the Hedging Plan contain confidential information.

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

a. Exhibit A is a copy of the Hedging Plan in which all of the Confidential Information has been highlighted.

b. Exhibit B consists of two copies of the Hedging Plan in which all the Confidential Information has been redacted. Where entire pages are confidential, FPL includes only identifying cover pages in Exhibit B.

c. Exhibit C is a table that identifies by column and line the information for which confidential treatment is sought and references the specific statutory bases for the claim of confidentiality and the declarant who supports the requested classification.

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

3. 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.

4. As described more fully in the declaration included as Exhibit D, the Hedging Plan includes details of FPL's strategy and plans for hedging fuel purchases in 2017 and beyond. Certain Confidential Information contained in the Hedging Plan relates to hedging-related bids or other contractual data, the disclosure of which would impair the efforts of FPL to hedge on favorable terms, to the detriment of FPL and its customers. This information is protected by Section 366.093(3)(d), Fla. Stat.

5. Additionally, the Confidential Information contained in the Hedging Plan also relates to competitive interests, and its disclosure would impair the competitive business of FPL. This information is protected by Section 366.093(3)(e), Fla. Stat.


6. 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 declarations included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

R. Wade Litchfield, Esq.,
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John T. Butler, Esq.
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By: _____


Maria J. Moncada
Fla. 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 mail on this 4th day of August 2016 to the following:

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By: _____



Maria J. Moncada
Fla. Bar No. 0773301

* The exhibits to this Request are not included with the service copies. A redacted copy of the Hedging Plan is included as Exhibit GJY-5 to FPL's 2016 actual/estimated true-up Petition. Copies of Exhibits C and D are available upon request.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

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.

2017 Hedging Strategy (TFB-4, Items 2 and 8)

FPL plans to hedge a portion of its projected 2018 natural gas requirements during 2017. 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:

- 1) FPL will hedge approximately [REDACTED]^A of its projected 2018 natural gas requirements from [REDACTED]^A through [REDACTED]^B ("the Hedging Window") using financial swaps, and/or physical fixed price transactions. This hedge percentage is a reduction from the 2017 hedge level and is within FPL's system base load requirements. FPL will hedge approximately [REDACTED]^A of each individual month's projected natural gas requirements. FPL will not financially hedge its projected natural gas requirements beyond the end of calendar year 2018.
- 2) This Hedging Window is the same as it was in the 2016 Risk Management Plan.
- 3) During each month of the Hedging Window, FPL will hedge between [REDACTED]^A and [REDACTED]^A of the target monthly volumes. This percentage range has been expanded from previous Risk Management Plans. FPL is expanding this range to provide more flexibility to make any necessary hedging adjustments. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.
- 4) FPL intends to rebalance its natural gas hedge positions during the year based on changes in forecasted market prices, projected unit outage schedules or 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. FPL will maintain an overall hedge percentage that falls within a [REDACTED]^A tolerance band. Therefore, the minimum and maximum monthly hedge percentages are [REDACTED]^A and [REDACTED]^B respectively.
- 5) FPL does not intend to hedge heavy fuel oil for 2018. FPL discontinued fuel oil hedging in 2013 and the factors that influenced that decision still remain.

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 55]

Trading and Risk Management Procedures Manual

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 27]

Energy Trading and Risk Management Policy

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 1 through 20]

Planned Position Strategy

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Exhibits
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
DOCKET NO: 160001-EI
DATE: August 4, 2016

FPL's 2017 Risk Management Plan	5 of 7	Lines 1A, 2A, 2B, 3A, 4A, 5A, 6A, 7A, 7B	(d), (e)	G. Yupp
Trading and Risk Management Procedures Manual	2 through 55	ALL	(d), (e)	G. Yupp
Energy Trading and Risk Management Policy	2 through 27	ALL	(d), (e)	G. Yupp
Planned Position Strategy	1 through 20	ALL	(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 of its 2017 Risk Management (Hedging) Plan. 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 fuel purchases. Additionally, the confidential information contained in the 2017 Risk Management Plan 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, the materials should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. 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: 8/1/2016