

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 160001-EI

Filed: October 4, 2016

**FLORIDA POWER & LIGHT COMPANY'S
PREHEARING STATEMENT**

Florida Power & Light Company ("FPL"), pursuant to Order Nos. PSC-16-0109-PCO-EI, PSC-16-0109A-PCO-EI, PSC-16-0244-PCO-EI, PSC-16-0265-PCO-PU and PSC-16-0394-PCO-PU, hereby submits its Prehearing Statement regarding the issues to be addressed at the hearing scheduled for November 2-4, 2016.

1) WITNESSES

WITNESS	SUBJECT MATTER	ISSUES
G. J. Yupp	Continuation of Natural Gas Financial Hedging Activities (Rebuttal of OPC Witness Lawton and Staff Witnesses Michael A. Gettings and Mark Anthony Cicchetti)	1A
G. J. Yupp	Natural Gas Financial Hedging Activities (Rebuttal of OPC Witness Lawton and Staff Witnesses Michael A. Gettings and Mark Anthony Cicchetti)	1B
G. J. Yupp	2016 Hedging Activity Reports	3A
G. J. Yupp	2017 Risk Management Plan	3B
G. J. Yupp	Incentive Mechanism Gains	3C
G. J. Yupp	Incremental Optimization Costs	3D-3I
R. B. Deaton	Cape Canaveral Energy Center GBRA Refund	3J
G. J. Yupp	Woodford Project Refund	3K

R. B. Deaton	Fuel Adjustment True-up and Projections	7-12 and 19-23
G. J. Yupp M. Kiley	Fuel Adjustment True-Up and Projections	9-12 and 19
C. R. Rote	2015 GPIF Reward	17
C. R. Rote	2017 GPIF Target/Ranges	18
R. B. Deaton	WCEC-3 Non-Fuel Revenue Requirements For January 2017 through December 2017	25
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2) **EXHIBITS**

Witness	Subject Matter	Exhibits
R. B. Deaton	Fuel Cost Recovery 2015 Final True Up Calculation	TJK-1
R. B. Deaton	Capacity Cost Recovery 2015 Final True Up Calculation (Confidential)	TJK-2
G. J. Yupp	2015 Incentive Mechanism Results (Confidential)	GJY-1
C. R. Rote	Generating Performance Incentive Factor Performance Results for January 2015 through December 2015	CRR-1
G. J. Yupp	August 2015 through December 2015 Hedging Activity True-up Report (Confidential)	GJY-2
R. B. Deaton	FCR 2016 Actual/Estimated True Up Calculation	TJK-3
R. B. Deaton	CCR 2016 Actual/Estimated True Up Calculation	TJK-4
G. J. Yupp	Woodford Refund Calculation	GJY-3
G. J. Yupp	VOM Correction Refund	GJY-4
G. J. Yupp	FCR 2017 Risk Management Plan (Confidential)	GJY-5
G. J. Yupp	Hedging Activity Report (Confidential)	GJY-6
G. J. Yupp	Fuel Cost Recovery Forecast Assumptions	GJY-7
R. B. Deaton	FCR 2017 E-Schedules Jan through Dec 2017	TJK-5

Witness	Subject Matter	Exhibits
R. B. Deaton	CCR 2017 E-Schedules Jan through Dec 2017 Proposed Cost Allocation Methodology 12 CP and 25% (Confidential)	TJK-6
R. B. Deaton	CCR 2017 E-Schedules Jan through Dec 2017 Current Cost Allocation Methodology 12 CP and 1/13 th	TJK-7
R. B. Deaton	2017 Revenue Requirement Calculation for West County Energy Center Unit 3	TJK-8
C. R. Rote	Generating Performance Incentive Factor Performance Targets for January 2017 through December 2017	CRR-2

3) STATEMENT OF BASIC POSITION

FPL’s 2017 Fuel and Purchased Power Cost Recovery factors and Capacity Cost Recovery factors, including its prior period true-ups, are reasonable and should be approved. As a result of the Florida Supreme Court’s decision on the Woodford Gas Reserves Project, FPL has included a refund to customers in the Fuel Clause of \$24,532,560. FPL’s asset optimization activities in 2015 delivered total gains of \$46,884,377. Of these total gains, FPL is allowed to retain \$530,626. FPL’s Incremental Optimization Costs are reasonable and should be approved for recovery. FPL’s hedging activities, as reported in the April 2016 and August 2016 hedging reports should be approved as compliant with its Commission-approved 2016 Risk Management Plan.

FPL’s 2017 Risk Management Plan also should be approved. FPL’s natural gas financial hedging program has been and is expected to continue to be beneficial to customers in reducing their exposure to fuel price volatility. Staff witness Mark Anthony Cicchetti and Michael A. Gettings recommend implementing a risk-responsive hedging strategy. While such a hedging approach is intuitively appealing and may have promise, it would not be appropriate to implement it without first undertaking a full and transparent evaluation. If the Commission were to decide that the utilities should adopt a risk-responsive approach, the implementation of this approach should take place within the framework of the existing Hedging Guidelines approved in Order No. PSC-08-0667-PAA-EI issued on October 8, 2008. It would be appropriate for the Commission to hold a series of workshops in which the Florida Public Service Commission Staff, the Florida Investor-owned Utilities (“IOUs”) and other interested parties could address, first, whether the risk-responsive approach is indeed likely to outperform the existing fixed-percentage approach in a sufficiently wide range of fuel-price scenarios and decision parameters

to warrant adopting it; and, second, if so, how it could be effectively implemented and monitored in a manner that protects customers and the IOUs alike.

4) STATEMENT OF ISSUES AND POSITIONS

HEDGING ISSUES

ISSUE 1A: Is it in the consumers' best interest for the utilities to continue natural gas financial hedging activities?

FPL: Yes. Utilities' natural gas financial hedging program limit the volatility of fuel costs that FPL customers pay, thus working exactly as intended by the Commission's hedging guidelines. (Yupp)

ISSUE 1B: What changes, if any, should be made to the manner in which electric utilities conduct their natural gas financial hedging activities?

FPL: None at this time. FPL developed its 2017 Risk Management Plan consistent with the proposals set forth in the Joint Petition by Investor-Owned Utilities for Approval of Modifications to Risk Management Plans filed on April 22, 2016 in Docket No. 160096-EI. FPL believes that implementing a risk-responsive hedging strategy today as recommended by Staff witness Mark Anthony Cicchetti could have merit, but it would be premature to implement that strategy without first conducting a full and transparent evaluation. (Yupp)

COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES

ISSUE 3A: Should the Commission approve as prudent FPL's actions to mitigate the volatility of natural gas, residual oil, fuel oil, and purchased power prices, as reported in FPL's April 2016 and August 2016 hedging reports?

FPL: Yes. FPL's risk management plan currently involves only natural gas hedging. FPL's actions to mitigate the price volatility of natural gas, as reported in FPL's April 2016 and August 2016 hedging reports, are reasonable and prudent. (Yupp)

ISSUE 3B: What action should the Commission take regarding FPL's 2017 Risk Management Plan?

FPL: The Commission should approve FPL's 2017 Risk Management Plan ("RMP"). FPL's RMP complies with the Hedging Guidelines established by this Commission and should be approved. (Yupp)

ISSUE 3C: What is the total gain in 2015 under the Incentive Mechanism approved in Order No. PSC-13-0023-S-EI, and how is that gain to be shared between FPL and customers?

FPL: FPL's asset optimization activities in 2015 delivered total gains of \$46,884,377. Of these total gains, FPL is allowed to retain \$530,626. (Yupp)

ISSUE 3D: What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2015 through December 2015?

FPL: The amount of Incremental Optimization Costs for Personnel, Software, and Hardware Costs that FPL should be allowed to recover through the fuel clause is \$473,550 for the period January 2015 through December 2015. (Yupp)

ISSUE 3E: What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M costs incurred to generate output for wholesale sales in excess of 514,000 megawatt-hours for the period January 2015 through December 2015?

FPL: The amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M costs incurred to generate output for wholesale sales in excess of 514,000 megawatt-hours for the period January 2015 through December 2015 is \$2,563,924. (Yupp)

ISSUE 3F: What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2016 through December 2016?

FPL: The amount of Incremental Optimization Costs for Personnel, Software, and Hardware Costs that FPL should be allowed to recover through the fuel clause is \$476,389 for the period January 2016 through December 2016. (Yupp)

ISSUE 3G: What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M costs incurred to generate output for wholesale sales in excess of 514,000 megawatt-hours for the period January 2016 through December 2016?

FPL: The amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M costs incurred to generate output for wholesale sales in excess of 514,000 megawatt-hours for the period January 2016 through December 2016 is \$2,277,340. (Yupp)

ISSUE 3H: If the Commission approves FPL's petition to continue the Incentive Mechanism with modifications in Docket No. 160088-EI, what is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2017 through December 2017?

FPL: The amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2017 through December 2017 is \$476,708. (Yupp)

ISSUE 3I: If the Commission approves FPL's petition to continue the Incentive Mechanism with modifications in Docket No. 160088-EI, what is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M costs associated with wholesale economy sales and purchases for the period January 2017 through December 2017?

FPL: The amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M costs associated with wholesale economy sales and purchases for the period January 2017 through December 2017 is \$496,340. (Yupp)

ISSUE 3J: Is \$1,890,528 the appropriate refund amount associated with the Cape Canaveral Energy Center (CCEC) GBRA true-up?

FPL: Yes. Pursuant to FPL's Stipulation and Settlement Agreement approved by the Commission in Order No. PSC-13-0023-S-EI, issued in Docket No. 120015-EI, once CCEC actual capital costs are known, if actual capital expenditures for the unit are less than the projected costs used to develop the initial GBRA Factor, the lower figure shall be the basis for the full revenue requirements and a one-time credit is to be made through the Capacity Clause. (Deaton)

ISSUE 3K: What amount should be refunded to customers in the Fuel Clause as a result of the Florida Supreme Court's decision on the Woodford Gas Reserves Project?

FPL: The amount that should be refunded to customers in the Fuel Clause as a result of the Florida Supreme Court's decision on the Woodford Gas Reserves Project is \$24,532,560, which includes interest of \$38,999 calculated from March 2015 through June 2016. This \$24,532,560 consists of \$21,294,315 credited to customers in June 2016 plus \$3,238,245 that is reflected in the 2016 monthly true-up amounts. (Yupp)

GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 7: What are the appropriate actual benchmark levels for calendar year 2016 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

FPL: FPL implemented a pilot Incentive Mechanism beginning in 2013, which was a component of the Stipulation and Settlement that was approved by the Commission in Order No. PSC-13-0023-S-EI. The new Incentive Mechanism does not rely upon the three-year average Shareholder Incentive Benchmark specified in Order No. PSC-00-1744-PAA-EI, so is not applicable to FPL for calendar year 2016. (Deaton)

ISSUE 8: What are the appropriate estimated benchmark levels for calendar year 2017 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

FPL: If the Commission approves FPL's petition to continue the Incentive Mechanism with modifications as requested in Docket No. 160088-EI, the modified Incentive Mechanism would not rely upon the three-year average Shareholder Incentive Benchmark specified in Order No. PSC-00-1744-PAA-EI, so would be inapplicable to FPL. (Deaton)

ISSUE 9: What are the appropriate final fuel adjustment true-up amounts for the period January 2015 through December 2015?

FPL: \$29,767,250 over-recovery, which is being refunded as part of the mid-course correction approved by Order No. PSC-16-0120-PCO-EI. (Deaton)

ISSUE 10: What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2016 through December 2016?

FPL: \$26,483,684 under-recovery. (Deaton)

ISSUE 11: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2017 to December 2017?

FPL: \$26,483,684 under-recovery. (Deaton)

ISSUE 12: What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2017 through December 2017?

FPL: Jurisdictionalized, \$2,966,325,004 excluding prior period true-ups, revenue taxes, FPL's portion of Incentive Mechanism gains, the GPIF reward and Vendor Settlement Refund. (Deaton)

**COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR
(GPIF) ISSUES**

Florida Power & Light Company

No company-specific issues for Florida Power & Light Company have been identified at this time. If such issues are identified, they shall be numbered 14A, 14B, 14C, and so forth, as appropriate.

GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

ISSUE 17: What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2015 through December 2015 for each investor-owned electric utility subject to the GPIF?

FPL: \$31,658,059 reward. (Rote)

ISSUE 18: What should the GPIF targets/ranges be for the period January 2017 through December 2017 for each investor-owned electric utility subject to the GPIF?

FPL:

<u>Plant / Unit</u>	<u>EAF Target (%)</u>	<u>ANOHR TARGET BTU/KWH</u>
Cape Canaveral 3	79.4	6,663
Manatee 3	70.9	6,968
Ft. Myers 2	92.4	7,301
Martin 8	72.9	6,977
St. Lucie 1	93.6	10,401
St. Lucie 2	83.7	10,278
Turkey Point 3	85.1	11,106
Turkey Point 4	85.4	11,019
Turkey Point 5	78.3	7,134
West County 1	89.5	6,989
West County 2	93.0	6,941
West County 3	76.1	6,975

(Rote)

FUEL FACTOR CALCULATION ISSUES

ISSUE 19: What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2017 through December 2017?

FPL: \$3,019,548,507 including prior period true-ups, revenue taxes, FPL's portion of Incentive Mechanism gains, the GPIF reward and Vendor Settlement Refund. (Deaton)

ISSUE 20: What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2017 through December 2017?

FPL: 1.00072. (Deaton)

ISSUE 21: What are the appropriate levelized fuel cost recovery factors for the period January 2017 through December 2017?

FPL: 2.813 cents/kWh for January 2017 through December 2017. (Deaton)

ISSUE 22: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

FPL: The appropriate fuel cost recovery line loss multipliers are provided in response to Issue No. 23. (Deaton)

ISSUE 23: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

FPL:

GROUPS	RATE SCHEDULE	JANUARY - DECEMBER		
		Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
A	RS-1 first 1,000 kWh	2.813	1.00252	2.491
A	RS-1 all additional kWh	2.813	1.00252	3.491
A	GS-1, SL-2, GSCU-1, WIES-1, SL-2M	2.813	1.00252	2.820
A-1	SL-1, OL-1, PL-1, SL-1M ⁽¹⁾	2.739	1.00252	2.745
B	GSD-1	2.813	1.00246	2.820
C	GSLD-1, CS-1	2.813	1.00171	2.818
D	GSLD-2, CS-2, OS-2, MET	2.813	0.99482	2.798
E	GSLD-3, CS-3	2.813	0.97229	2.735
A	GST-1 On-Peak	3.204	1.00252	3.212
	GST-1 Off-Peak	2.650	1.00252	2.657
A	RTR-1 On-Peak	-	-	0.392
	RTR-1 Off-Peak	-	-	(0.163)
B	GSDT-1, CILC-1(G), HLFT-1 (21-499 kW) On-Peak	3.204	1.00246	3.212
	GSDT-1, CILC-1(G), HLFT-1 (21-499 kW) Off-Peak	2.650	1.00246	2.657
C	GSLDT-1, CST-1, HLFT-2 (500-1,999 kW) On-Peak	3.204	1.00171	3.209
	GSLDT-1, CST-1, HLFT-2 (500-1,999 kW) Off-Peak	2.650	1.00171	2.655
D	GSLDT-2, CST-2, HLFT-3 (2,000+ kW) On-Peak	3.204	0.99535	3.189
	GSLDT-2, CST-2, HLFT-3 (2,000+ kW) Off-Peak	2.650	0.99535	2.638
E	GSLDT-3, CST-3, CILC-1(T), ISST-1(T) On-Peak	3.204	0.97229	3.115
	GSLDT-3, CST-3, CILC-1(T), ISST-1(T) Off-Peak	2.650	0.97229	2.577
F	CILC-1(D), ISST-1(D) On-Peak	3.204	0.99450	3.186
	CILC-1(D), ISST-1(D) Off-Peak	2.650	0.99450	2.635

⁽¹⁾ WEIGHTED AVERAGE 16% ON-PEAK AND 84% OFF-PEAK

GROUPS	RATE SCHEDULE	JUNE - SEPTEMBER		
		Average Factor	Fuel Recovery Loss Multiplier	Fuel Recovery Factor
B	GSD(T)-1 On-Peak	4.017	1.00246	4.027
	GSD(T)-1 Off-Peak	2.655	1.00246	2.662
C	GSLD(T)-1 On-Peak	4.017	1.00171	4.024
	GSLD(T)-1 Off-Peak	2.655	1.00171	2.660
D	GSLD(T)-2 On-Peak	4.017	0.99535	3.998
	GSLD(T)-2 Off-Peak	2.655	0.99535	2.643

Note: On-Peak Period is defined as June through September, weekdays 3:00pm to 6:00pm
Off Peak Period is defined as all other hours.

Note: All other months served under the otherwise applicable rate schedule.
See Schedule E-1E, Page 1 of 2.

Note: Totals may not add due to rounding.

(Deaton)

CAPACITY ISSUES

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 25: If the Commission does not approve recovery of the WCEC-3 revenue requirement through base rates in Docket No. 160021-EI, what are the appropriate 2017 projected non-fuel revenue requirements for West County Energy Center Unit 3 (WCEC-3) to be recovered through the Capacity Clause?

FPL: \$140,795,481. (Deaton)

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 28: What are the appropriate final capacity cost recovery true-up amounts for the period January 2015 through December 2015?

FPL: \$5,938,824 over-recovery. (Deaton)

ISSUE 29: What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2016 through December 2016?

FPL: \$9,639,909 over-recovery. (Deaton)

ISSUE 30: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2017 through December 2017?

FPL: \$15,578,733 over-recovery. (Deaton)

ISSUE 31: What are the appropriate projected total capacity cost recovery amounts for the period January 2017 through December 2017?

FPL: Jurisdictionalized, \$313,376,833 for the period January 2017 through December 2017, excluding prior period true-ups, revenue taxes, and the CCEC GBRA True-up. (Deaton)

ISSUE 32: What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2017 through December 2017?

FPL: The projected net purchased power capacity cost recovery amount to be recovered over the period January 2017 through December 2017 is \$296,120,626, including prior period true-ups, revenue taxes, and the CCEC GBRA True-up. (Deaton)

ISSUE 33: What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2017 through December 2017?

FPL: The appropriate jurisdictional separation factors are:
FPSC 95.04658%
FERC 4.95342% (Deaton)

ISSUE 34: What are the appropriate capacity cost recovery factors for the period January 2017 through December 2017?

FPL: The January 2017 through December 2017 capacity cost recovery factors based on the 12CP and 25% Production Plant cost allocation methodology and excluding WCEC-3 revenue requirements as proposed by FPL in Docket 160021-EI are as follows:

12CP AND 25% COS ALLOCATION				
RATE SCHEDULE	Capacity Recovery Factor (\$/KW) ⁽ⁱ⁾	Capacity Recovery Factor (\$/kw h) ⁽ⁱ⁾	RDC (\$/KW) ^(k)	SDD (\$/KW) ^(l)
RS1/RTR1	-	0.00298	-	-
GS1/GST1	-	0.00278	-	-
GSD1/GSDT1/HLFT1	0.94	-	-	-
OS2	-	0.00214	-	-
GSLD1/GSLDT1/CS1/CST1/HLFT2	1.05	-	-	-
GSLD2/GSLDT2/CS2/CST2/HLFT3	1.07	-	-	-
GSLD3/GSLDT3/CS3/CST3	1.09	-	-	-
SST1T	-	-	\$0.13	\$0.06
SST1D1/SST1D2/SST1D3	-	-	\$0.13	\$0.06
CILC D/CILC G	1.20	-	-	-
CILC T	1.17	-	-	-
MET	1.19	-	-	-
OL1/SL1/PL1/SL1M	-	0.00092	-	-
SL2, GSCU1,SL2M	-	0.00212	-	-

If the Commission declines to accept FPL's proposed cost allocation methodology and/or declines to move the WCEC-3 revenue requirements to base rates, the appropriate capacity cost recovery factors for the period January 2017 through December 2017 are set forth in Exhibit TJK-6, Page 23 (based on the 12CP and 25% Production Plant including WCEC-3 revenue requirements), Exhibit TJK-7, Page 3 (based on 12CP and 1/13th excluding WCEC-3 revenue requirements), and Exhibit TJK-7, Page 7 (based on 12CP and 1/13th including WCEC-3 revenue requirements). (Deaton)

EFFECTIVE DATE

ISSUE 35: What should be the effective date of the fuel adjustment factors and capacity cost recovery factors for billing purposes?

FPL: The factors shall be effective beginning with the specified fuel and capacity cost recovery cycle and thereafter for the period January 2017 through December 2017. Billing cycles may start before January 1, 2017 and the last cycle may be read after December 31, 2017, so that each customer is billed for twelve months regardless of when the adjustment factor became effective. These charges shall continue in effect until modified by subsequent order of this Commission. (Deaton)

TARIFF APPROVAL

ISSUE 36: Should the Commission approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding?

FPL: Yes. The Commission should approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision. (Deaton)

ISSUE 37: Should this Docket be closed?

FPL: Yes. The docket should be closed after issuance of the final order approving expenditures and true-up amounts for fuel adjustment factors; GPIF targets, ranges and rewards; and projected expenditures and true-up amounts for capacity cost recovery factors. (Deaton)

CONTESTED ISSUES

FPL does not believe it is necessary or appropriate to include these issues. FPL will provide a position at or shortly following the prehearing conference if the Prehearing Officer concludes that these issues should be included.

ISSUE 1C: What were the financial results for each IOUs natural gas hedging activities for 2015?

ISSUE 1D: What were the financial results for each IOUs natural gas hedging activities for 2016 as of July 31, 2016?

5) STIPULATED ISSUES

FPL: None at this time.

6) PENDING MOTIONS

FPL: None at this time.

7) PENDING REQUESTS FOR CONFIDENTIALITY

1. Florida Power & Light Company's request for confidential classification of certain information contained in hedging activity report, Exh GJY-2 to testimony of Gerard J. Yupp, dated April 6, 2016. [DN 01842-16]

2. Florida Power & Light Company's request for confidential classification of Weaver and Tidwell LLP's joint interest billing audit plan (JIB audit plan), dated April 6, 2016. [DN 01849-16]
3. Florida Power & Light Company's request for confidential classification of 423 Forms for Jan/Dec, Feb/Jan, Mar/Feb 2016, dated May 3, 2016. [DN 02693-16]
4. Florida Power & Light Company's request for confidential classification of gas reserves accounting internal audit report, dated May 11, 2016. [DN 02905-16]
5. Florida Power & Light Company's request for confidential classification of materials provided pursuant to Audit No. 16-020-4-1., dated June 29, 2016. [DN 04091-16]
6. Florida Power & Light Company's request for confidential classification of certain information on 2017 risk management plan, which is Appendix V (Exh GJY-5) to the 2016 actual/estimated true-up petition, dated August 4, 2016. [DN 05880-16]
7. Florida Power & Light Company's request for confidential classification certain information contained in the fuel hedging activity report, Exh GJY-6 to testimony of Gerard J. Yupp, dated August 18, 2016. [DN 06844-16]
8. Florida Power & Light Company's request for confidential classification of information provided in response to OPC's 3rd set of interrogatories (Nos. 67 and 72), dated August 19, 2016. [DN 06893-16]
9. Florida Power & Light Company's request for confidential classification of certain information provided in response to Staff's 4th set of interrogatories (No. 41), dated August 26, 2016. [DN 07038-16]
10. Florida Power & Light Company's request for confidential classification of certain information contained in Schedule E12 of Appendix III to testimony of Terry J. Keith, dated September 1, 2016. [DN 07226-16]
11. Florida Power & Light Company's request for confidential classification of certain information provided in response to OPC's 4th set of interrogatories (No. 81), dated September 1, 2016. [DN 07224-16]
12. Florida Power & Light Company's request for confidential classification of materials provided pursuant to Audit No. 16-068-4-1 , dated September 14, 2016. [DN 07525-16]
13. Florida Power & Light Company's request for confidential classification of certain information provided in response to Staff's 6th set of interrogatories (No. 50), dated September 29, 2016. [DN 07867-16]

8) OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

FPL: None at this time.

9) STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

There are no requirements of the Order Establishing Procedure with which FPL cannot comply.

Respectfully submitted this 4th day of October 2016.

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

By: s/ John T. Butler
John T. Butler
Fla. Bar No. 283479

CERTIFICATE OF SERVICE
Docket 160001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic delivery on the 4th day of October 2016 to the following:

Danjela Janjic, Esq.
Suzanne Brownless, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
djanjic@psc.state.fl.us
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
amaurey@psc.state.fl.us
mbarrett@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.
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
laura.wynn@smxblaw.com

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

Mike Cassel, Director/Regulatory and
Governmental Affairs
Florida Public Utilities Company
911 South 8th Street
Fernandina Beach, Florida 32034
mcassel@fpuc.com

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

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

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

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: s/ John T. Butler
John T. Butler
Fla. Bar No. 283479