



**REDACTED**

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

May 24, 2018

**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

**Re: Docket No. 20180001-EI**

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Materials Provided Pursuant to Audit No. 2018-019-4-1. 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 declarations in support of FPL's Request for Confidential Classification.

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

Sincerely,

Maria J. Moncada

Enclosures

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

COM	_____
AFD	_____ /
APA	_____
ECO	_____
ENG	_____
GCL	_____
IDM	_____
CLK	_____

RECEIVED-PPSC  
2018 MAY 24 PM 12:54  
COMMISSION  
CLERK

6613598

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No: 20180001-EI

Date: May 24, 2018

**FLORIDA POWER & LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2018-019-4-1**

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. 2018-019-4-1 ("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 May 3, 2018, 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 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 containing an identification of the information highlighted in Exhibit A by page and line and a brief description of the confidential information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarants who support of the requested classification.

d. Exhibit D contains the declarations of Antonio Maceo and 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 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 described more fully in the declarations included as Exhibit D, certain documents 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 concern FPL's competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. 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 three (3) years 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 reasons, as more fully set forth in the supporting materials, 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  
Senior 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. 20180001-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 24th day of May 2018 to the following:

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

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Patricia Christensen, Esq.  
Charles Rehwinkel, Esq.  
Erik L. Sayler, Esq.  
**Office of Public Counsel**  
c/o The Florida Legislature  
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Tallahassee, Florida 32399  
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Public Utilities Company**

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jmoyle@moylelaw.com

**Attorneys for Florida Industrial Power  
Users Group**

By: \_\_\_\_\_

  
Maria J. Moneada  
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.

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

**EXHIBIT B**

**REDACTED COPIES**

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 9

[Pages 1 through 2]

LIST OF INTERNAL AUDITS

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 9.1

[Page 1]

NOTES

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 9.2

[Page 1]

NOTES

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 9.3

[Page 1]

NOTES

4/18/17

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# Purchase Statement

PBC

Purchase Statement: 369200  
 Counterparty: The Energy Authority, Inc.  
 Date: May 01, 2017  
 Period: Apr 01, 2017 - Apr 30, 2017  
 Amount: \$(697,626.00) USD  
 Due Date: May 22, 2017



ENTERED BY: Eliette Elistin DATE: 05/01/17  
 PHONE: 561-691-7276 COMPANY CODE: 1500  
 AUTHORIZED BY: \_\_\_\_\_

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

REQUIRED IF UNDER \$250

SALES DOCUMENT #(S): 1800134580  
 ACCT NUMBER: 8009400

C: 6800000561

**Pay To**  
 The Energy Authority, Inc.  
 Attn: Settlements Administrator  
 301 W. Bay Street  
 Suite 2600  
 Jacksonville, FL 32202

RS 703,607.00 ✓  
 PI 29,244.00 ✓  
 732,851.00 ✓

**Summary**

PO5 732,851.00 ✓  
 PO2 732,851.00 ✓  
 PO5, PO2 5,981.00 ✓

*Net sell*  
*Buy*  
 Michèle Dwyer  
 Manager, Power & Fuels Accounting

Deal Type	Deal Direction	Amount Due	Currency
POWER	Buy	\$(726,870.00)	USD
	Sell	\$29,244.00	USD
POWER Subtotal		\$(697,626.00)	USD
TOTAL		\$(697,626.00)	USD

**Details**

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Source-Location	Price	Amount Due	Currency
POWER										
Buy										
3956	Deal					MW				USD
4936	Deal					MW				USD
5836	Deal					MW				USD
6231	Deal					MW				USD
7591	Deal					MW				USD
4928	Deal					MW				USD

CONFIDENTIAL

Florida Power & Light Co.  
 Fuel & Purchased Power Cost Recovery Clause  
 Dkt. 20180001-EI, ACN 2018-019-4-1  
 TYE 1/1/2017 - 12/31/17

Title

46-3 p1 (A) 29,244  
 (A) 703,607  
 46-4 732,851 (46 p1)

PI

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462-p2

# Purchase Statement



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Purchase Statement: 369200

Counterparty: The Energy Authority, Inc.

Date: May 01, 2017

Period: Apr 01, 2017 - Apr 30, 2017

Amount: \$(697,626.00) USD

Due Date: May 22, 2017

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Source-Location	Price	Amount Due	Currency
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## POWER

Buy

A B

C

D

Buy Subtotal	\$(726,870.00)	USD
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Sell

462-1  
462-2

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Source-Location	Price	Amount Due	Currency
2005150	Deal					MW				USD
2005154	Deal					MW				USD
2005164	Deal					MW				USD
2005168	Deal					MW				USD
2005260	Deal					MW				USD
2005298	Deal					MW				USD
2005306	Deal					MW				USD
2005315	Deal					MW				USD
2005319	Deal					MW				USD
2005949	Deal					MW				USD
5955	Deal					MW				USD
8851	Deal					MW				USD
8863	Deal					MW				USD
8908	Deal					MW				USD
8913	Deal					MW				USD
8975	Deal					MW				USD
8983	Deal					MW				USD
9060	Deal					MW				USD

462-1

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

Title

Pa

SOURCE Reg 18

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# Purchase Statement



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Purchase Statement: 369200

Counterparty: The Energy Authority, Inc.

Date: May 01, 2017

Period: Apr 01, 2017 - Apr 30, 2017

Amount: \$(697,626.00) USD

Due Date: May 22, 2017

06.2-18

Deal # Type Trade Dt Term Index Volume UoM Source Location Price Amount Due Currency

## POWER

Sell	A	B	C	D	E	F
2009069 Deal				MW		USD
2009640 Deal				MW		USD
2014851 Deal				MW		USD
2014856 Deal				MW		USD
2014866 Deal				MW		USD
2014870 Deal				MW		USD

1	Sell Subtotal	\$29,244.00	USD
2	POWER Subtotal	\$(697,626.00)	USD
3	TOTAL	\$(697,626.00)	USD

Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

Title

SOURCE Page 18

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Title \_\_\_\_\_

*JHP*  
*4/18*

Enter information for the Deal



1 [Status: Saved-Invoiced] [Links: BACK TO BACK->2005151] [Modified: exe09rg 2017-05-01 14:01:40] [Created: dxd0m97]

2 Number: 2005150 **B** Ticket: C

3 Trade Date: [ ] Trader: David Dowdell (REG)

Direction: Sell Term: Hourly

Start Date: [ ] End Date: [ ]

ISO: SERC

Point Code: SOCO

Time Zone: Eastern Hour Type: Hourly

Priority: NON FIRM [POWER, NON FIRM]

Schedule: Real Time Market

Counterparty: The Energy Authority, Inc. [TEA MKTR]

Contact: Desk, Hourly [New Contact]

Portfolio: FPL Sales

Agent For: [ ]

Strategy: PWROPERATE

Contract: MBR00-016

Limit/Avail: / FAS Hedge MTM Non

Exec Method: Phone Exec Time: 00:04

Currency: USD UoM: MW

Heat Rate: No -Shape No Custom No

Hour Type Information

4 Hours of Day: [ ]

Volume Information

Volume: [ ]

Notional Volume: [ ]

Price Information

Price Type: [ ]

Fixed Price: [ ]

Supply Side

Volume: [ ]

Supply Price: [ ]

Fuel Cost: [ ]

O&M: [ ]

Invoiced: No

*46 PBC 2*

CONFIDENTIAL

Proker Commissions Product Notes Back to Back Deals Power Charges Tiers Transmission Schedule

Schedule Id	Status	Action	Curtailed	Start Date	End Date	OASIS	POR	POD	Std?	Buy Deal Key	Buy ISO	Buy Point

Do not create Back to Back Deal

OK Cancel

SOURCE Req 18

46-2-1

Title \_\_\_\_\_

*4/18*

Enter information for the Deal

1 [Status: Saved-Invoiced] [Links: BACK TO BACK->2005155] [Modified: exe09rg 2017-05-01 14:01:40] [Created: dxd0m97-...]

2 Number: 2005154 <sup>B</sup> Ticket: <sup>C</sup>  Standard Tier  Shaped Tier

3 Trade Date: [Redacted] Trader: David Dowdell (REG) Hour Type Information: 4 Hours of Day [Redacted]

Direction: Sell Term: Hourly

Start Date: [Redacted] End Date: [Redacted]

ISO: SERC

Point Code: SOCO

Time Zone: Eastern Hour Type: Hourly

Priority: NON FIRM [POWER, NON FIRM]

Schedule: Real Time Market

Counterparty: The Energy Authority, Inc. [TEA MKTR]

Contact: Desk, Hourly New Contact

Portfolio: FPL Sales

Agent For:

Strategy: PWROPERATE

Contract: HBR00-016

Limit/Avail: / FAS: fledge MTM Non

Exec Method: Phone Exec Time: 02:03

Currency: USD UoM: MW

Heat Rate: No Shape No Custom No

Price Information: Price Type:  Formula/Index *46-2 P2*

Fixed Price: [Redacted]

Supply Side: Volume: [Redacted] Supply Price: [Redacted] Fuel Cost: [Redacted] O&M: [Redacted]

Involved: No

**CONFIDENTIAL**

Do not create Back to Back Deal

OK Cancel

SOURCE Req 18

46-2-2

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Invoice



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

PBC

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

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CONFIDENTIAL

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
DKL 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

Invoice To

The Energy Authority, Inc.  
Settlements Administrator  
W. Bay Street  
2600  
Tallahassee, FL 32202  
Phone: 904 356-3900  
904 634-0453

Summary

Deal Type	Deal Direction	Amount Due	Currency
POWER	Sell	\$703,607.00	USD
POWER Subtotal		\$703,607.00	USD
TOTAL		\$703,607.00	USD

46-2 p1

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Title

Details

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Source-Location	Price	Amount Due	Currency
POWER										
Sell										
	A	B		C	D	E	F			
2003239	Deal					MW				USD
2004976	Deal					MW				USD
2004978	Deal					MW				USD
2004984	Deal					MW				USD
2004986	Deal					MW				USD

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SOURCE log 18

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46-3 p2

Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

Deal # Type Trade Dt Term Index Volume UoM Source Location Price Amount Due Currency

POWER

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Source Location	Price	Amount Due	Currency
2004990	Deal					MW				USD
2004994	Deal					MW				USD
2004998	Deal					MW				USD
2005004	Deal					MW				USD
2005007	Deal					MW				USD
2005009	Deal					MW				USD
2005015	Deal					MW				USD
2005021	Deal					MW				USD
2005107	Deal					MW				USD
2005119	Deal					MW				USD
2005123	Deal					MW				USD
2005132	Deal					MW				USD
5142	Deal					MW				USD
5146	Deal					MW				USD
5148	Deal					MW				USD
5166	Deal					MW				USD
5174	Deal					MW				USD
5209	Deal					MW				USD
5221	Deal					MW				USD
5224	Deal					MW				USD
5229	Deal					MW				USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Reg 18

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Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

ed-3 p3

Deal # Type Trade Dt Term Index Volume UoM Source Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2005239 Deal				MW		USD
2005254 Deal				MW		USD
2005258 Deal				MW		USD
2005274 Deal				MW		USD
2005280 Deal				MW		USD
2005292 Deal				MW		USD
2005296 Deal				MW		USD
2005304 Deal				MW		USD
2005313 Deal				MW		USD
2005321 Deal				MW		USD
2005939 Deal				MW		USD
944 Deal				MW		USD
946 Deal				MW		USD
953 Deal				MW		USD
013 Deal				MW		USD
658 Deal				MW		USD
663 Deal				MW		USD
667 Deal				MW		USD
312 Deal				MW		USD
319 Deal				MW		USD
331 Deal				MW		USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Reg 18

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Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

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Deal# Type Trade Dt Term Index Volume UoM Source Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2008337 Deal			MW			USD
2008340 Deal			MW			USD
2008411 Deal			MW			USD
2008440 Deal			MW			USD
2008484 Deal			MW			USD
2008565 Deal			MW			USD
2008632 Deal			MW			USD
2008749 Deal			MW			USD
2008805 Deal			MW			USD
2008816 Deal			MW			USD
2008831 Deal			MW			USD
2008837 Deal			MW			USD
08843 Deal			MW			USD
08853 Deal			MW			USD
08861 Deal			MW			USD
08870 Deal			MW			USD
08874 Deal			MW			USD
08890 Deal			MW			USD
08892 Deal			MW			USD
08906 Deal			MW			USD
08911 Deal			MW			USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180004-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Reg 18

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Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

46-3 ps

Deal # Type Trade Dt Term Index Volume UoM Source-Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2008916 Deal			MW			USD
2008924 Deal			MW			USD
2008973 Deal			MW			USD
2008980 Deal			MW			USD
2008994 Deal			MW			USD
2008997 Deal			MW			USD
2009000 Deal			MW			USD
2009005 Deal			MW			USD
2009018 Deal			MW			USD
2009030 Deal			MW			USD
2009036 Deal			MW			USD
9047 Deal			MW			USD
9058 Deal			MW			USD
9067 Deal			MW			USD
9142 Deal			MW			USD
9606 Deal			MW			USD
9613 Deal			MW			USD
9619 Deal			MW			USD
9629 Deal			MW			USD
9662 Deal			MW			USD
10300 Deal			MW			USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

Title

SOURCE Reg 18

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2/13  
FPL

Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

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Deal# Type Trade Dt Term Index Volume UoM Source-Location Price Amount Due Currency

POWER

Deal#	Type	Trade Dt	Term	Index	Volume	UoM	Source-Location	Price	Amount Due	Currency
2010303	Deal					MW				USD
2010308	Deal					MW				USD
2010324	Deal					MW				USD
2010327	Deal					MW				USD
2010333	Deal					MW				USD
2010335	Deal					MW				USD
2010358	Deal					MW				USD
2010854	Deal					MW				USD
2010860	Deal					MW				USD
2010864	Deal					MW				USD
2010868	Deal					MW				USD
2010876	Deal					MW				USD
0878	Deal					MW				USD
0880	Deal					MW				USD
0882	Deal					MW				USD
0884	Deal					MW				USD
0886	Deal					MW				USD
0891	Deal					MW				USD
0943	Deal					MW				USD
014	Deal					MW				USD
082	Deal					MW				USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Reg 18

PIO

Handwritten initials/signature

Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

46-3p7

PBC

CONFIDENTIAL

Deal # Type Trade Dt Term Index Volume UoM Source Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2011212 Deal				MW		USD
2011343 Deal				MW		USD
2011345 Deal				MW		USD
2011356 Deal				MW		USD
2011489 Deal				MW		USD
2011505 Deal				MW		USD
2011518 Deal				MW		USD
2011522 Deal				MW		USD
2011525 Deal				MW		USD
2011531 Deal				MW		USD
2011537 Deal				MW		USD
2011539 Deal				MW		USD
1542 Deal				MW		USD
1544 Deal				MW		USD
1546 Deal				MW		USD
1552 Deal				MW		USD
1562 Deal				MW		USD
1575 Deal				MW		USD
1588 Deal				MW		USD
1590 Deal				MW		USD
1606 Deal				MW		USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Reg 18

P11

Title

*Handwritten initials*

Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

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Deal # Type Trade Dt Term Index Volume UoM Source Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2011618	Deal			MW		USD
2011627	Deal			MW		USD
2011632	Deal			MW		USD
2011642	Deal			MW		USD
2011663	Deal			MW		USD
2011665	Deal			MW		USD
2011671	Deal			MW		USD
2011676	Deal			MW		USD
2011683	Deal			MW		USD
2011687	Deal			MW		USD
2011725	Deal			MW		USD
2011728	Deal			MW		USD
1732	Deal			MW		USD
1734	Deal			MW		USD
1739	Deal			MW		USD
1746	Deal			MW		USD
1762	Deal			MW		USD
1785	Deal			MW		USD
1791	Deal			MW		USD
1816	Deal			MW		USD
1820	Deal			MW		USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Reg 18

PIA

*Handwritten initials*

Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

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Deal # Type Trade Dt Term Index Volume DoM Source Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2011901 Deal				MW		USD
2011906 Deal				MW		USD
2011953 Deal				MW		USD
2012070 Deal				MW		USD
2012115 Deal				MW		USD
2012223 Deal				MW		USD
2012236 Deal				MW		USD
2012249 Deal				MW		USD
2012253 Deal				MW		USD
2012262 Deal				MW		USD
2012268 Deal				MW		USD
2012273 Deal				MW		USD
2286 Deal				MW		USD
2374 Deal				MW		USD
2378 Deal				MW		USD
2485 Deal				MW		USD
2599 Deal				MW		USD
2603 Deal				MW		USD
2678 Deal				MW		USD
2777 Deal				MW		USD
2928 Deal				MW		USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Reg 18

P13

SIP  
JRE

Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

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Deal # Type Trade Dt Term Index Volume UoM Source Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2012932 Deal				MW		USD
2012934 Deal				MW		USD
2012939 Deal				MW		USD
2012945 Deal				MW		USD
2012949 Deal				MW		USD
2012954 Deal				MW		USD
2012960 Deal				MW		USD
2012964 Deal				MW		USD
2012979 Deal				MW		USD
2012982 Deal				MW		USD
2013017 Deal				MW		USD
2013069 Deal				MW		USD
3089 Deal				MW		USD
3600 Deal				MW		USD
3624 Deal				MW		USD
3626 Deal				MW		USD
3637 Deal				MW		USD
3648 Deal				MW		USD
3652 Deal				MW		USD
3658 Deal				MW		USD
3662 Deal				MW		USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Reg 18

DIA

Title

Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

PBC

CONFIDENTIAL

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Deal # Type Trade D Term Index Volume UoM Source Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2013667 Deal			MW			USD
2013676 Deal			MW			USD
2013683 Deal			MW			USD
2013689 Deal			MW			USD
2013691 Deal			MW			USD
2013707 Deal			MW			USD
2013805 Deal			MW			USD
2013811 Deal			MW			USD
2013837 Deal			MW			USD
2013931 Deal			MW			USD
2013961 Deal			MW			USD
2013997 Deal			MW			USD
183 Deal			MW			USD
188 Deal			MW			USD
194 Deal			MW			USD
200 Deal			MW			USD
202 Deal			MW			USD
206 Deal			MW			USD
211 Deal			MW			USD
4724 Deal			MW			USD
4808 Deal			MW			USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Reg 18

P15

Title

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*Handwritten initials*

Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

Deal # Type Trade Dt Term Index Volume UoM Source-Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2014810 Deal			MW			USD
2014812 Deal			MW			USD
2014814 Deal			MW			USD
2014818 Deal			MW			USD
2014820 Deal			MW			USD
2014823 Deal			MW			USD
2014853 Deal			MW			USD
2014913 Deal			MW			USD
2014939 Deal			MW			USD
2014965 Deal			MW			USD
2015062 Deal			MW			USD
2015186 Deal			MW			USD
4 Deal			MW			USD
5 Deal			MW			USD
13 Deal			MW			USD
33 Deal			MW			USD
04 Deal			MW			USD
11 Deal			MW			USD
34 Deal			MW			USD
821 Deal			MW			USD
639 Deal			MW			USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Reg 18

P16

*Handwritten initials*

Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

PBC

CONFIDENTIAL

46-3 p 13

Deal # Type Trade Dt Term Index Volume UoM Source Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2016762 Deal				MW		USD
2016827 Deal				MW		USD
2016867 Deal				MW		USD
2016872 Deal				MW		USD
2016888 Deal				MW		USD
2017245 Deal				MW		USD
2017809 Deal				MW		USD
2018651 Deal				MW		USD
2018656 Deal				MW		USD
2018663 Deal				MW		USD
2019273 Deal				MW		USD
2019277 Deal				MW		USD
19279 Deal				MW		USD
19284 Deal				MW		USD
19317 Deal				MW		USD
19319 Deal				MW		USD
9323 Deal				MW		USD
9334 Deal				MW		USD
9337 Deal				MW		USD
9345 Deal				MW		USD
9369 Deal				MW		USD

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

SOURCE Page 18

P17

*Handwritten initials*

Invoice



Florida Power & Light Company  
Tax ID # 59-0247775

PBC

CONFIDENTIAL

Invoice: 369201  
Counterparty: The Energy Authority, Inc.  
Date: May 01, 2017  
Period: Apr 01, 2017 - Apr 30, 2017  
Amount: \$703,607.00 USD  
Due Date: May 22, 2017

46-3 p14

Deal # Type Trade Dt Term Index Volume UoM Source Location Price Amount Due Currency

POWER

Sell	A	B	C	D	E	F
2019371	Deal					
2019375	Deal					USD
2019379	Deal					USD
2019383	Deal					USD
2019387	Deal					USD
2019389	Deal					USD
2019394	Deal					USD
2019396	Deal					USD
2019398	Deal					USD
2019410	Deal					USD
2019416	Deal					USD
2019418	Deal					USD
19423	Deal					USD
19425	Deal					USD
19429	Deal					USD
19431	Deal					USD

1	Sell Subtotal	\$703,607.00	USD
2	POWER Subtotal	\$703,607.00	USD
3	TOTAL	\$703,607.00	USD

PI

Page 18

SOURCE

Florida Power & Light Co.  
Fuel & Purchased Power Cost Recovery Clause  
Dkt. 20180001-EI, ACN 2018-019-4-1  
TYE 1/1/2017 - 12/31/17

P18

**PAYMENT COUPON**

Title \_\_\_\_\_

/411500676503680000056118001345200000598100

JHP  
4/18

4,1,1500,676503,8000000561,1800134520,0,0000598100

1800134520 1 of 1

Cust. No.: 6800000561		Inv. No.: 1800134520	
This Month's Charges	Amount Due		
Past Due After	This Invoice		
05/20/2017	\$ 5,981.00		

**THE ENERGY AUTHORITY**  
 76 S LAURA ST STE 1500  
 JACKSONVILLE FL 32202

Make Wire or ACH Payment to FPL in USD using banking information below:

Account Name (Wire & ACH): Florida Power & Light Co.  
 Bank Name (Wire & ACH): Bank of America  
 Account Number (Wire & ACH): 3750132076  
 WIRES ONLY - City/State: New York, NY 10001 ABA No.: 026009693  
 ACH ONLY - City/State: Dallas, TX ABA No.: 111000012

Florida Power & Light Company  
**Invoice**  
 Customer Name and Address

**THE ENERGY AUTHORITY**  
 76 S LAURA ST STE 1500  
 JACKSONVILLE FL 32202

Federal Tax Id.#: 69-0247775

Customer Number: 6800000561  
 Invoice Number: 1800134520  
 Invoice Date: 05/03/2017

PBC

4,1,1500,676503,8000000561,1800134520,0,0000598100  
 Please retain this Invoice for your records

**CURRENT CHARGES AND CREDITS**  
 Customer No: 6800000561 Invoice No: 1800134520

Description	Amount
1 201704 - FPL POWER PURCHASES - EDF - [REDACTED]	726,870.00-
2 201704 - FPL POWER SALES - EDF - [REDACTED]	732,851.00
For Inquiries Contact: Ellette Ellstin 561.691.7276	<b>Total Amount Due \$5,981.00</b> This Month's Charges Past Due After 05/20/2017

CONFIDENTIAL

AL 46-2 p1

SOURCE Req 18

46-4

*JEP*  
*4/8*

Title \_\_\_\_\_  
**Qualifying Facility Monthly Billing Statement**

	A	B	C
<b>Facility Name:</b>	BROWARD RESOURCE RECOVERY SOUTH		
<b>Region:</b>	Southeast		
<b>Billing Month:</b>	December, 2017		
<b>Number of Hours in Month:</b>	744		
<b>Number of Peak Hours in Month:</b>	248		
<b>Committed Capacity:</b>	3,500 MW		
1 <b>Energy Received, All Hours:</b>	[REDACTED]		
2			
3 <b>Energy Received, All Peak Hours:</b>	[REDACTED]		
4			
5 <b>Sales (Wheeled):</b>	[REDACTED]		
6 <b>Net Energy Received, All Hours:</b>	[REDACTED]		
7 <b>Maximum Hourly Energy:</b>	[REDACTED]		
8 <b>Committed Capacity:</b>	[REDACTED]		
9 <b>Monthly Billing Capacity Factor:</b>	[REDACTED]		
10 <b>Monthly Peak Capacity Factor:</b>	[REDACTED]		
11 <b>Annual Capacity Factor:</b>	[REDACTED]		
12 <b>Annual Peak Capacity Factor:</b>	[REDACTED]		
13 <b>Billing Capacity Factor:</b>	[REDACTED]		
14 <b>Unit Energy Cost:</b>	[REDACTED]		
<b>Monthly Energy Payment:</b>	(As Available)	('91)	Total
15	[REDACTED]	[REDACTED]	\$126,967.40
	+	<b>P1</b>	
<b>Monthly Capacity Payment:</b>		\$110,600.00	\$110,600.00

**PBC**

**CONFIDENTIAL**

Execution Date/Time: 01/18/18 at 16:25:29

Invoice ID: 2869

SOURCE log 12

48-1 p2

JLP  
9/18

Title \_\_\_\_\_

# Qualifying Facility Monthly Billing Statement

A

<b>Facility Name:</b>	LEE COUNTY SOLID WASTE
<b>Region:</b>	West
<b>Billing Month:</b>	December, 2017
<b>Number of Hours in Month:</b>	744
<b>Number of Peak Hours in Month:</b>	168
1 <b>Energy Received, All Hours</b>	
2 <b>Energy Received, All Peak Hours:</b>	
3 <b>Sales (Wheeled):</b>	
4 <b>Net Energy Received, All Hours:</b>	
5 <b>Maximum Hourly Energy:</b>	
<b>Monthly Energy Payment:</b>	\$89,835.79 ✓

PBC

(P)

CONFIDENTIAL

Execution Date/Time: 01/18/18 at 18:31:49  
Invoice ID: 2879

SOURCE 169.12

48-2 p2

9/18

Title

# Qualifying Facility Monthly Billing Statement

A

**Facility Name:** LEE COUNTY SOLID WASTE  
**Region:** West  
**Billing Month:** November, 2017  
**Number of Hours in Month:** 721  
**Number of Peak Hours in Month:** 176  
**1 Energy Received, All Hours**  
**2 Energy Received, All Peak Hours:**  
**3 Sales (Wheeled):**  
**4 Net Energy Received, All Hours:**  
**5 Maximum Hourly Energy:**  
**Monthly Energy Payment:** → \$49,457.51



PBC

48-2-2

48-2-2

CONFIDENTIAL

Execution Date/Time: 12/15/17 at 09:44:59  
Invoice ID: 2850

SOURCE log 12 follow up

48-2-2-1

*Handwritten initials and date:*  
4/18

Title \_\_\_\_\_ **Daily Energy Payment Summary**

Facility Name: LEE COUNTY SOLID WASTE

Report Month: November, 2017

A	B	C
Date	Energy(MWH)	Payment

PBC

**CONFIDENTIAL**

48-2-2.3 →  
Line 1

Monthly total 24,951.406 49,457.81

*Handwritten circled number:*  
48-2-2-1

- 2 Average Cost :
- 3 Maximum Energy:

Execution Date/Time: 12/15/17 at 09:44:59

Invoice ID: 2850

SOURCE Request 12 follow up

48-2-2.2

*JEP*  
*418*

Title

Hourly As Available Energy Payment

*Hourly for*  
~~*Daily*~~ *11/30*

Facility Name : LEE COUNTY SOLID WASTE

*48-3.1*

Date: 11/30/17

*↓ all*

Hour	Energy (MWH)	Sales (Wheeled) (MWH)	Unit Net (MWH)	Avoided Cost (\$/MWH)	Total Payment (\$)	Note
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
Daily Total	25					<i>2-2</i>
Month-to-Date	26					

*PBC*

*48-2.2-1*

Execution/Date Time : 12/15/17 at 09:44:59  
 Invoice ID : 2850

SOURCE *Request 12 follow up.*

*Selected this day for avoided cost verification.*

*48-2.2.3*

8/17  
 JHT

18-2-91

Title \_\_\_\_\_

Page

	A	B	C	D	E	F	G	H	I
1	ASSET OPTIMIZATION DETAIL								
2	Actual for the Period of: January 2017 through December 2017								
3									
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	NOX	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Storage	AMA	Emissions	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Optimization	Gains	Sales	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
9									
10	January								1,032,914
11	February								1,168,100
12	March								1,120,311
13	April 50-2.1								1,121,805
14	May								1,975,086
15	June								1,656,384
16	July								1,744,266
17	August								2,069,815
18	September								1,851,678
19	October								1,220,333
20	November								1,417,614
21	December								2,383,803
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									
32									
33									
34	Total	3,538,237	602,559	3,217,971	8,945,076	861,359	1,478,429	119,180	18,762,809

PBC

CONFIDENTIAL

50

50

✓ agreed to offer detail capacity release transaction aid to F&T details for award # 57877

CONFIDENTIAL

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PBC

Month of April selected for tested - see references above.

src: Reg 16

Florida Power & Light Co.  
 Fuel & Purchased Power Cost Recovery Clause  
 Dkt. 20180001-EI, ACN 2018-019-4-1  
 TYE 1/1/2017 - 12/31/17

JB-2 PL

Title \_\_\_\_\_

ASSET OPTIMIZATION DETAIL  
 Actual for the Period of: January 2017 through December 2017

PBC

8/17/18

(1) Month	(2) Natural Gas Delivered City-Gate Sales (\$) A	(3) Natural Gas Production Area Sales (\$) B	(4) Natural Gas Capacity Release Firm Transport (\$) C	(5) Natural Gas Option Premiums (\$) D	(6) Natural Gas Storage Optimization (\$) E	(7) Natural Gas AMA Gains (\$) F	(8) NOX Emissions Sales (\$) G	(9) Total Asset Optimization Gains (\$) H
January								1,032,914
February								1,168,100
March								1,120,311
April								1,121,805
May								1,975,986
June								1,656,384
July								1,744,266
August								2,069,815
September								1,851,678
October								1,220,333
November								1,417,614
December								2,393,603
Total								18,762,809

See  
Schedule

See  
Schedule

H  
[Redacted]

See  
Schedule

I 50-2.5 J  
[Redacted]

See  
GDOM PBC  
Document

PBC

SOURCE Request 17

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.1

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ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.1.1

[Page 1]

ASSET OPTIMIZATION DETAIL

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Fuel Audit Workpaper Number 50-2.1.2

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ASSET OPTIMIZATION DETAIL

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Fuel Audit Workpaper Number 50-2.1.3

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Fuel Audit Workpaper Number 50-2.1.4

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ASSET OPTIMIZATION DETAIL

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ASSET OPTIMIZATION DETAIL

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ASSET OPTIMIZATION DETAIL

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ASSET OPTIMIZATION DETAIL

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Fuel Audit Workpaper Number 50-2.3

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ASSET OPTIMIZATION DETAIL

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Fuel Audit Workpaper Number 50-2.3.1

[Page 1]

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Fuel Audit Workpaper Number 50-2.3.2

[Page 1]

ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.3.3

[Page 1]

ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.3.4

[Page 1]

ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.4

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ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.4.1

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ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.4.2

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ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.4.3

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ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.4.4

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ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.5

[Page 1]

ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.5.1

[Page 1]

ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.5.2

[Page 1]

ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.5.3

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ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.5.4

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ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.5.5

[Page 1]

ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.5.6

[Page 1]

ASSET OPTIMIZATION DETAIL

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Number 50-2.5.7

[Page 1]

ASSET OPTIMIZATION DETAIL

JAP  
4/18

**ENERGY MARKETING AND TRADING**  
**O&M EXPENSES - FUEL (A04)**  
**April-17**

Title \_\_\_\_\_

Account Group		Apr-17	
FPL Salaries & Wages	FPLGN1019		
FPL Labor Related Overheads	FPLGN1020		
<b>Total FPL Labor</b>	<b>FPLGN1002</b>		
Business Travel: Lodging	5600000		
Meals & Entertainment	5600100		
Business Travel: Air	5600200		
Business Travel: Car Rental	5600300		
Business Travel: Misc. Expenses	5600500		
Business Travel: Occasional Use Mileage	5600700		
Dues & Subscriptions	5610100	\$ 375	1) Line 1
Education & Training	5340000		
<b>Total Employee Related Expenses</b>	<b>FPLGN1003</b>		
Cellular Telephone and Pagers	FPLGN1032		
<b>Total Telecommunications</b>	<b>FPLGN1032</b>		
Office Supplies	5760300		
<b>Total Office &amp; Facilities Administration</b>	<b>FPLGRU10016</b>		
<b>Total ICE User Fees</b>	<b>5760220</b>		
<b>Total Personnel Costs</b>		<b>\$ 33,413</b>	<b>Line 2</b>
Corporate Payroll	8110006		
NEER Payroll	8110059		
External Labor Overheads	FPLGRU10102		
<b>Total External Labor</b>	<b>FPLGRU10100</b>		
Outside Services - Temporary Labor	5750700		
<b>Total Contractor &amp; Professional Services</b>	<b>FPLGN1004</b>		
Software Maintenance	5760210		
Software Purchases	Formula from above		2)
<b>Total Software Expenditures</b>			
Hardware Expenditures	FPLGRU100171		
Other Expenses	FPLGRU10018		
<b>Total Other Expenses</b>	<b>FPLGRU10018</b>		
<b>Total Other Expenditures</b>		<b>\$ 4,920</b>	<b>Line 3</b>
<b>Total</b>		<b>\$ 38,333</b>	<b>Line 4</b>

**CONFIDENTIAL**

**PBC**

RECAP:		Apr-17
Total Personnel Costs		\$ 33,413
Total Other Expenditures		\$ 4,920
<b>Total O&amp;M Expenses Fuel</b>		<b>\$ 38,333</b>

\$ 33,413 - 375 = 33,038

- (1) Represents Dodd Frank Fees. - Dodd Frank Fees are captured separately outside of the Optimization program. See A2
- (2) Software Purchases relate to the OATI project

\$ 33,038  
 \$ 4,920  
 \$ 37,958

50-3  
50-3

Request  
SOURCE 17

v-agreed to Payroll Recap coded as such.

50-3.1

JHP  
4/18

Title \_\_\_\_\_

Counterparty  
Bay Gas Storage Company, Ltd. [BAY GAS]

A B C D E  
Contract Month Invoice Counterparty Volume (Signed) Period-End Gain/Loss (Signed)

Grand Total

- Vendor = Bay Gas, Account = 50% to PERG 50110 95% to PERC 54710
- All expenses are related to firm gas storage only.

confidential

CONFIDENTIAL

PBC

Selected one mth

5-1 → F Sum (A)  
Total 9/17 = [REDACTED]

Req 14

SOURCE \_\_\_\_\_

JH  
4/18

Title \_\_\_\_\_

**Bay Gas Storage Co., Ltd.**                      **Inv ID FP&L-6764**                      **September 2017**  
**Customer: Florida\_Power\_N\_Light Company**    **Svc Req K: FP&L00473S**  
**Svc Req K Effective Date: 04/01/2013**    **Svc Req K Termination Date: 03/31/2018**

**Quantities by Location**

Rec/Del Loc	Loc Ind	A			B			C		
		Sch	Receipt Qty		Sch	Delivery Qty		Net		
AEC	XXPDXXXX									
BayGas Hub	PRPDXXXX									
Clarke Mobile Gas MS	XXPDXXXX									
FGT	PRPDXXXX									
GSPLAXIS	PRPDXXXX									
GSPLWHISTLER	PRPDXXXX									
Hatters Pond	PRXXXXXX									
MGSWHISTLER	XXPDXXXX									
MobileGasSalco	PRPDXXXX									
OLIN	XXPDXXXX									
SocoPlantBarry	XXPDXXXX									
TateandLyle	PRPDXXXX									
Tencel Fiber	XXPDXXXX									
ThyssenKrupp Stainless	PRPDXXXX									
ThyssenKrupp Steel	PRPDXXXX									
TRANSCO	PRPDXXXX									
BayGasHub	PRPDXXXX									

CO  
PBC

**Transactional Detail**

Line No	Beg/End Tran Date	Nom#	TT	Chrg Ind	Qty	Unit Price (Transaction Rate)	Amt Due	Unit Price (Transportation Rate)	Amt Due	Total
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
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21										
22										
23										
24										
25										
26										
27										
28										

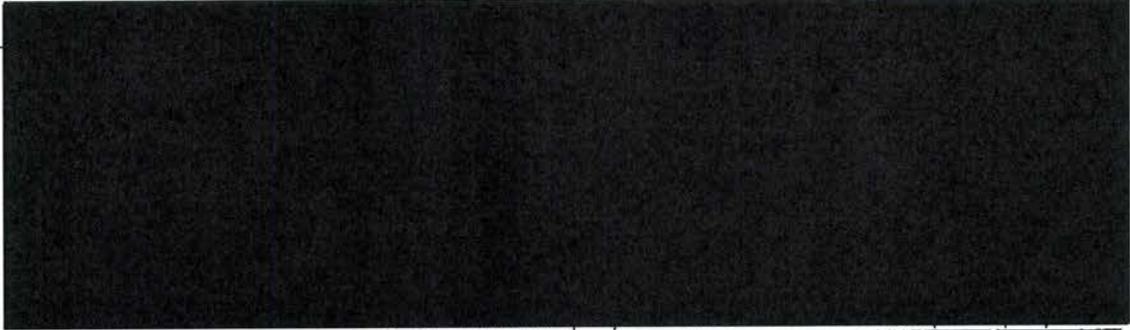
21

SOURCE Request 14 follow up

SI-1 p1

418

29  
 Title 30  
 31  
 32  
 33  
 34  
 35  
 36  
 37  
 38  
 39



(A2)  
 (A3)  
 (A4)  
 (A5)

40 Totals

Transaction Type Codes

06 Storage Injection	206 Storage Injection - Secondary	12 Authorized INJ Overrun	07 Storage Withdrawal	207 Storage Withdrawal - Secondary
13 Authorized WD Overrun	26 Park	27 Park WD		
28 Loan	29 Loan Payback	31 Meter Bounce		
132 Wheel	11 Storage Inventory Transfer (Dome Swap)			
71 Hub Sell	72 Hub Buy			
73 Wheel To Hub	74 Wheel From Hub			
75 Storage To Hub	76 Hub To Storage			

**CONFIDENTIAL**

Storage Activity Summary

Beginning Balance	PBC	A
Injections		
Fuel Loss on Injections		
Withdrawals		
Fuel Loss on Withdrawals		
Inventory Adjustments		
Dome Swaps		
Ending Balance		

Svc Req K Totals

Line No	Item	B Quantity	C Unit Price	D Amt Due
1	Monthly Storage Rate Fee			
2	Total Transaction Rate Fee			
3	Total Transportation Rate Fee			
Invoice Total Amount				

(5)

✓ agreed to Amendment to 2  
 to Firm Storage Service Agreement.

418

Title

SUPPLIER NAME	QNTY (MMBTU)	UNIT PRICE (\$/MMBTU)	INVOICE AMT (\$)	COMMENTS
1 BP Energy Company				
2 Castleton Commodities Merchant				
3 Cily of Lakeland				
4 ConocoPhillips				
5 Continental Resources				
6 Devon Gas Services				
7 Direct Energy Business Marketing				
8 DTE Energy Trading				
9 EDF Trading				
10 EnCana Marketing				
11 Enl Trading & Shipping				
12 Enercor Energy Services				
13 Enterprise Products				
14 EOG Resources				
15 EQT Energy				
16 Exelon Generation				
17 Houston Pipe Line				
18 Indigo Minerals				
19 JERA Energy America				
20 Macquarie Energy				
21 Mercuria Energy				
22 Mitsui & Co.				
23 NJR Energy Services				
24 Noble Energy Inc				
25 People Gas				
26 Range Resources				
27 Seminole Electric Cooperative				
28 Sempra Gas & Power Marketing				
29 Sequent Energy				
30 Shell Energy North America				
31 Spire Marketing, Inc.				
32 Targas Gas Marketing				
33 Tenaska Marketing				
34 Texla Energy				
35 TrillStone NA Logistics				
36 XTO Energy				

PBC

CONFIDENTIAL

CONFIDENTIAL

Adj: between Proc and Opt  
 BAY GAS STORAGE - APR PROCUREMENT ACTIVITY  
 BAY GAS STORAGE - APR OPTI ACTIVITY

TOTAL SUPPLY 66,614,810 3.0881 \$ 174,032,252.54

TRANSPORT TYPE & CONTRACT NUMBER	QNTY (MMBTU)	\$/MMBTU	INVOICE AMT (\$)	COMMENTS
FOT - FTS1 RESERVATION CHARGE (#3023)	7,174,621	0.6518	10,930,646.00	FTS2 - FIRM TRANSPORT 10/14/94 thro 02/28/2025
FOT - FTS2 USAGE CHARGE (#3023)	13,464,428.00	0.0200	269,846.91	FTS2 - FIRM TRANSPORT 10/14/94 thro 02/28/2025
FOT - FTS1 USAGE CHARGE (#3247)	2,557,450	0.5518	1,408,120.00	FTS1 - FIRM TRANSPORT 11/01/89 thro 07/31/2025
FOT - FTS1 USAGE CHARGE (#3247)	5,960,264.00	0.0202	141,003.35	FTS1 - FIRM TRANSPORT 11/01/89 thro 07/31/2025
FOT - FTS2 USAGE CHARGE (#)	12,000,000	1.1760	14,100,000.00	Contract Term - Effective 4/1/11 for 25 years.
FOT - FTS3 RESERVATION CHARGE (#11115)	11,982,494.00	0.504	45,922.73	Contract Term - Effective 4/1/11 for 25 years.
FOT - FTS3 USAGE CHARGE (#11115)	3,000,000	1.200	3,600,000.00	Contract Term - April only
FOT - FTS3 RESERVATION CHARGE (#114233)	1,411,637.00	0.007	19,606.61	Contract Term - April only
FOT - FTS3 USAGE CHARGE (#114233)	4,350,000	0.1300	565,500.00	Apr thro Oct Only - Through 2017
GULF SOUTH PIPELINE RESERVATION CHARGE (#4001)	4,349,910	0.0130	60,276.76	Apr thro Oct Only - Through 2017
GULF SOUTH PIPELINE USAGE CHARGE (#4001)	3,000,000	0.2374	712,200.00	Contract Term Apr 1, 2015 through Mar 31, 2025
GULF SOUTH PIPELINE RESERVATION CHARGE (#41618)	3,000,000	0.1000	300,000.00	Contract Term Apr 1, 2015 through Mar 31, 2025
GULF SOUTH PIPELINE USAGE CHARGE (#41618)	2,992,607.00	0.0105	31,732.87	Contract Term Apr 1, 2015 through Mar 31, 2025
GULF SOUTH PIPELINE RESERVATION CHARGE (#41619)	600,000	0.0200	12,000.00	Contract Term Apr 1, 2015 through Mar 31, 2025
GULF SOUTH PIPELINE USAGE CHARGE (#41619)	10,600,000	0.5500	6,776,000.00	Contract Term June 1 2005 through June 2026
GULFSTREAM RESERVATION CHARGE (#0000002)	9,791,837.00	0.0064	66,644.49	Firm Transport per Gulfstream Transportation Journal
GULFSTREAM USAGE CHARGE (#0000002)	10,330,000	0.5700	5,892,600.00	Contract Term Feb 6, 2008 through Oct 01, 2032
GULFSTREAM RESERVATION CHARGE (#0000001)	10,117,479.00	0.0064	68,798.86	Contract Term Feb 6, 2008 through Oct 01, 2032
GULFSTREAM USAGE CHARGE (#0000001)	17,006,000	0.2750	3,305,000.00	Contract Term Sep 6, 2005 through Sep 5, 2020
SESH RESERVATION CHARGE (#40001)	10,284,804.00	0.0083	84,794.26	Contract Term Sep 6, 2005 through Sep 5, 2020
SESH USAGE CHARGE (#40001)	3,000,000	0.2760	825,000.00	Contract Term Sep 6, 2005 through Sep 5, 2020
SESH RESERVATION CHARGE (#610002)	2,916,841.00	0.0053	19,689.21	Contract Term Sep 6, 2005 through Sep 5, 2020
SESH USAGE CHARGE (#610002)	60,000	3.2648	1,959,160.00	Contract Term Jan 1, 2012 through Dec 31, 2017
SESH RESERVATION CHARGE (#610003-R2)				Contract Term Jan 1, 2012 through Dec 31, 2017
SESH USAGE CHARGE (#610003-R2)	3,846,000	0.0093	381,002.70	
TRANSCONTINENTAL RESERVATION CHARGE (#9111300)	2,464,032	0.0051	12,645.10	
TRANSCONTINENTAL USAGE CHARGE (#9111300)				
REBUNDLED - FOT				REBUNDLED FIRM TRANSPORT
Imbalance - Gulfstream				REBUNDLED FIRM TRANSPORT

TRANSPORT TYPE & CONTRACT NUMBER	QNTY (MMBTU)	\$/MMBTU	INVOICE AMT (\$)	COMMENTS
BAY GAS STORAGE (Monthly Charge on 2.5 Mld Capacity including)				
FOT - Turkey Point Compressor Station #22	0	0.0000	\$ 323,462.67	
FOT - Cape Canaveral Compressor Station #32	0	0.0000	\$ 173,657.49	
FOT - Pompano Beach Compressor Station #21.5	0	0.0000	\$ 285,835.38	
Less: PPA Transportation (December True-up)		0.0000	\$	
TOTAL	3			

✓ - agreed to invoice + Purchase start  
 - Agreed tariff rate on invoice to " FOT, System Transportation Rate

SOURCE Request 15

ic 53

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Workpapers  
**AUDIT:** FPL, Fuel Audit  
**AUDIT CONTROL NO:** 2018-019-4-1  
**DOCKET NO:** 20180001-EI  
**DATE:** May 24, 2018

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
9	LIST OF INTERNAL AUDITS	2	Y	ALL	(b)	A. Maceo
9-1	NOTES	1	Y	ALL	(b)	A. Maceo
9-2	NOTES	1	Y	ALL	(b)	A. Maceo
9-3	NOTES	1	Y	ALL	(b)	A. Maceo
43-1	SAMPLE	1	N			
43-1.1	FUEL REQUISITION	1	N			
43-1.2	FUEL RECEIPTS	1	N			
43-2	SAMPLE	1	N			
43-2.1	GAS RECEIVING REPORT	1	N			
43-2.2	GAS COMPUTATION REPORT	1	N			
43-2.3	GAS PRICE COMPUTATIONS	1	N			
43-5	FILE OF FUEL TRANSACTIONS	1	N			
43-5.1	FUEL USED RECONCILIATION	1	N			
44-1	SCHEDULE A NOTES	1	N			
44-2	FUEL INVENTORY	1	N			
44-2.1	INVENTORY RECONCILIATION	1	N			
44-2.2	INVENTORY RECONCILIATION	1	N			
44-2.3	FUEL REQUISITION	2	N			
44-3	ADJUSTMENT	1	N			
44-3.1	COAL INVENTORY	1	N			
45-1	INVENTORY ANALYSIS	2	N			
45-2	OIL PURCHASES	1	N			
45-2.1	FOSSIL FUEL INVENTORY	1	N			
45-3	SJRPP	1	N			
45-4	SCHERER	1	N			
45-8	FORM 423-2	1	N			
45-9	LFARS FUEL USED	2	N			
46-1	TRANS SERVICE	1	N			
46-1.1	DEAL JOURNAL	1	N			
46-2	PURCHASE STATEMENT	3	Y	Pgs. 1-2, Cols. A-F Pg. 3, Cols. A-D Cols. E-F, except Line 1, Line 2, Line 3	(d)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
46-2.1	DEAL INFORMATION	1	Y	Lns. 1A, 4 Col. B, Lns. 2-3 Col. C, Line 3 Col. D	(d), (e)	G. Yupp
46-2.2	DEAL INFORMATION	1	Y	Lns. 1A, 4 Col. B, Lns. 2-3 Col. C, Line 3 Col. D	(d), (e)	G. Yupp
46-3	INVOICE	14	Y	Pgs. 1-13, Cols. A-F Pg. 14, Cols. A-D, Cols. E-F, except Line 1, Line 2, Line 3	(d)	G. Yupp
46-4	INVOICE	1	Y	Lns. 1A, 2A	(d)	G. Yupp
47-1	BILLING SUMMARY	1	N			
47-1.1	BILLING SUMMARY	1	N			
47-1.2	BILLING SUMMARY	1	N			
47-1.3	BILLING STATEMENT	1	N			
47-1.4	BILLING STATEMENT	1	N			
47-2	INVOICE	1	N			
47-2.1	BILLING REPORT	1	N			
47-2.2	SJRPP REPORT	1	N			
47-2.3	INVOICE	1	N			
47-2.4	BILLING REPORT	1	N			
47-2.5	SALEBACK BILLING	1	N			
47-2.6	PURCHASES	1	N			
47-2.7	INVOICE	1	N			
47-3	CONTRACT REVIEW	1	N			
48-1 p.2	BILLING STATEMENT	1	Y	Col. A, Lns. 1-15 Col. B, Lns. 1-4, 7, 14 and 15 Col. C, Lns. 1-4	(d), (e)	G. Yupp
48-1.1	BILLING STATEMENT	1	N			
48-1.2	BILLING STATEMENT	1	N			
48-2 p. 2	BILLING STATEMENT	1	Y	Col. A, Lns. 1-5	(d), (e)	G. Yupp
48-2.1	BILLING STATEMENT	1	N			
48-2.2	BILLING STATEMENT	1	N			
48-2.2.1	MONTHLY BILLING STATEMENT	1	Y	Col. A, Lns. 1-5	(d), (e)	G. Yupp
48-2.2.2	DAILY ENERGY PAYMENT SUMMARY	1	Y	Cols. A-C, except Line 1 Lns. 2A, 3A	(d), (e)	G. Yupp
48-2.2.3	HOURLY AS AVAILABLE ENERGY PAYMENT	1	Y	Lns. 1-26	(d), (e)	G. Yupp
48-4	TARIFF	1	N			
50-2	ASSET OPTIMIZATION DETAIL	2	Y	Pg. 1, Cols. B-H, Lns. 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32  Pg. 2, Cols. A-J	(e)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
50-2.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.5	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.6	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.2.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.2.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.2.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.2.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.3.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.3.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.3.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.3.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.4.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
50-2.4.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.4.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.4.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5	ASSET OPTIMIZATION DETAIL	2	Y	ALL	(d), (e)	G. Yupp
50-2.5.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.5	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.6	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.7	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-3.1	INCREMENTAL OPTIMIZATION COSTS	1	Y	Col. A, except Line 1, Line 2, Line 3, Line 4	(e)	G. Yupp
51	INVOICE LIST	1	Y	Cols. A-F	(d), (e)	G. Yupp
51-1	INVOICE	2	Y	Pg. 1, Cols. A-C Lns. 1-28  Pg. 2, Lns. 29-40 Cols. A-D	(d), (e)	G. Yupp
53	GAS REPORT	1	Y	Cols. A-C Lns. 1-3	(d), (e)	G. Yupp
53-1	PURCHASE STATEMENT	2	N			
53-2	INVOICE	1	N			
53-3	INVOICE	1	N			
53-4	RATE SCHEDULE	1	N			
53-5	INVOICE EXPLANATION	2	N			

# **EXHIBIT D**

## **DECLARATIONS**

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No: 20180001-EI

**DECLARATION OF ANTONIO MACEO**

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 declaration.

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. 2018-019-4-1 for which I am designated as the declarant. 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 2017. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing scope, process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may impact the effectiveness of the Internal Auditing department itself. 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 36 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.



Antonio Maceo

Date: \_\_\_\_\_

5/16/18

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20180001-EI

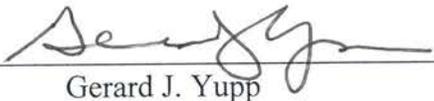
**DECLARATION OF GERARD J. YUPP**

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 business unit. I have personal knowledge of the matters stated in this declaration.

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. 2018-019-4-1 for which I am designated as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute data such as pricing and other terms, payment records, and vendor and supplier rates. Specifically, the documents include information related to the purchase or sale of energy and capacity, natural gas, and natural gas storage. The disclosure of this information would impair the efforts of FPL to contract for energy and capacity-related goods or services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a 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 not less than 36 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: 5/16/18