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May 6, 2019

-VIA ELECTRONIC FILING -

Adam Teitzman Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

REDACTED

Re: Docket No. 20190001-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") First Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 17-048-4-1. 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 is 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.

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ECO

FNG

IDM

Sincerely.

Maria J. Mancada

APA

Enclosure

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

:7276832

Florida Power & Light Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20190001-EI

Date: May 6, 2019

FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF MATERIALS PROVIDED PURSUANT TO AUDIT NO. 17-048-4-1

Pursuant to Section 366.093, Florida Statutes ("Section 366.093") and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its First Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 17-048-4-1 ("Confidential Information"). In support of this request, FPL states as follows:

- 1. On October 6, 2017, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("October 6, 2017 Request"). By Order No. PSC-2017-0425-CFO-EI, dated November 6, 2017 ("Order 0425"), the Commission granted FPL's October 6, 2017 Request. FPL adopts and incorporates by reference the October 6, 2017 Request and Order 0425.
- 2. The period of confidential treatment granted by Order 0425 will soon expire. Some of the Confidential Information that was the subject of FPL's October 6, 2017 Request and Order 0425 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.
- 3. Included with this request are First Revised Exhibit A, First Revised Exhibit B, together with First Revised Exhibit C to reduce the number of pages for which confidential treatment is sought. FPL has identified in First Revised Exhibits A, B and C all of the information in work papers that warrants continued confidential treatment. First Revised Exhibit C is a table that identifies the specific pages, lines or columns that remain confidential. The table

also references the specific statutory basis for confidentiality and the declarant who supports the requested classification.

- 4. Also included as First Revised Exhibit D is the declaration of Gerard J. Yupp in support of this request.
- 5. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, such materials are entitled to confidential treatment and are 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.
- 6. As explained more fully in the declaration included as First Revised Exhibit D, 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.
- 7. Also, certain documents contain information relating to 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.
- 8. Nothing has changed since the Commission entered Order 0425 to render the Confidential Information stale or public, such that continued confidential treatment would not be appropriate.
- 9. Pursuant to Section 366.093(4), F.S., the information for which confidential classification is granted remains protected from disclosure up to 18 months unless good cause is

shown to grant protection from disclosure for a longer period. Currently, the Commission retains audit reports for period of seven years at which time the audit materials are returned to FPL unless Commission staff or another affected person requests that these audit materials continue to be retained. The nature of these materials will not change in the next three years. Therefore, to promote administrative efficiency, FPL requests confidential classification for a period of thirty-six (36) months. 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 thirty-six (36) 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 included with or incorporated in this Request, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

Maria Jose Moncada Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408

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Email: maria.moncada@fpl.com

y: ____

Maria Jose Moncada Florida Bar No. 0773301

CERTIFICATE OF SERVICE Docket No. 20190001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic service on this 6th day of May 2019 to the following:

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By:

Maria Jose Moncada Florida Bar No. 0773301

EXHIBIT B

REDACTED COPIES

1/28/17

Hedging Audit 2017 – Docket No. 170001 Audit Request No. 6 (Part No. 2)

O:

2) Please provide: a statement explaining the treatment of transaction costs and brokerage fees. Please provide the related invoices.

A:

2) Currently, the only transaction costs incurred by FPL's financial hedging program are Intercontinental Exchange, Inc. (ICE) brokerage charges. Users are charged a monthly minimum commission of

WP-148-14.9

A Total broker fees are included on the Hedging Activity reports filed each April and August. Individual user traded commissions, if any, are netted against his or her individual monthly minimum commission regardless of the OTC market traded. Commissions are expensed in the month incurred. These costs flow through account 3305000 to G/L account 2300000 directly and are not included in the FPL Derivative Settlements reports. G/L account 2300000 is the FPL Fuel Inventory account.

Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt, 2017-048-4-1;
Description: W. 10 - 144 Response * (e

CONFIDENTIAL

AUGUST 2016 SUMMARY

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Α

48-614 PROCUREMENT PURCHASES **GAS RESERVES TRANSPORTATION** STORAGE 48-6.15 FINANCIAL SETTLEMENTS 48-6.15 PROCUREMENT SALES - CURRENT MONTH ONLY 48-6-15 **OPTI SALES - CURRENT MONTH ONLY** TOTAL \$ 247,684,881.42 48-6.15 **PHOENIX - TOTAL GAS** \$ (247,684,881.42) DIFFERENCE

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
For the Twelve Mouths Ended July 31, 2017
Dkt. 20170001-EI; ACN 2017-048-4-1;
Description: WPUS - HECCITY ACTIVITIES



48-6:13

48-6.14

FGT - Cape Caneum hermaressor Station #22 FGT - Cape Caneum hermaressor Station #32 FGT - Pompano Beach Compressor Station #21.5	STIMATED F			R PRIOR HADJUSTMENTS]	
Subtotal for Adjuster	•			•	
					4.4
TOTAL	174,465,812	0,3213	\$ 56,061,648.28	·	
GAS RESERVES		UNIT PRICE			
ОЖЕО ТО	QNTY [MMBTU]			COMMENTS	
Gas Reserves - Physical Gas Reserves - Transportation		#DIV/01 #DIV/01	0.00 0.00		
Adjustment Below the Line (Refund to Customers for Gas Re	serves Project - 3/15-6/16)	学习的基础			Verviterini september
TOTAL	0	·	0.00		

OTHER MISCELLANEOUS EXPENSES INCURRED FOR CURR [TO BE PAID IN FOLLOWING MONTH, UNLESS NOTED OTHE	ENT MONTH:			\$	
OWED TO		UNIT PRICE	F INVOICE AMT [\$]		-
FGT Financial Activity	QNTY [MMBTU]	(\$/MMBTU)	INVOICE ANT (\$)	COMMENTS 3	
Power Related Financial Activity Total Financial Activity Related to Fuel Expense		_		REFER TO FINANCIAL ATTACHMENT FORWARDS	
			48-0	\mathcal{O}	
Total Adjustments TOTAL			48-6	REFER TO EXPENSE ATTACHMENT	
CARMS (MISC, BILLS) FOR MONEY RECEIVED DURING CURF	PENT MONTH				G
the state of the s	CENT MONTH:			10 1 10	
FROM Sales	CARMS INVOICE	UNIT PRICE [\$/MMBTU]	H AMT RECEIVED [\$]	/48-6.13 /comments	
Adjustments			48-6.19	REFER TO SALES TAB	<u> </u>
Optimization Sales TOTAL		<u> </u>	18-6.14 (REFER TO OPTIMIZATION SALES TAB	(refer to teb for coding)
NET CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRE ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONT EQUIVALENT UNIT PRICE FOR CURRENT MONTH (\$*MMBTU	и (итами) н			\$ #REFI	248,535,373.32
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ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONT EQUIVALENT UNIT PRICE FOR CURRENT MONTH [\$/MMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 43,897,767 [MMBTU]	TH [MMBTU] THE PERRY	BROOKER = STREAM 1 =	1.0280 1.0230	#REFI #REFI HEAT VALUE APPLICABLE TO: PPN, PSN, PCC Manatee/FiMyer	249,535,373.32
ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONT EQUIVALENT UNIT PRICE FOR CURRENT MONTH [\$IMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 43,997,767 [MMBTU] Guilistream deliveries to Manatee/Martin/West County for MON 21,433.1	H [MMBTU]	BROOKER = STREAM 1 =	1.0280 1.0230 1.0270	#REFI #REFI HEAT VALUE APPLICABLE TO: PPN, PSN, PCC Manatee/FiMyer PMR, PRV, PPE, PFL, PCU, PTF	249,535,373.32
ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONT EQUIVALENT UNIT PRICE FOR CURRENT MONTH (\$IMMBTU FGT "GAS DAY" ENERGY MEASURED FOR MONTH 43,997,767 [MMBTU] Gulfstream delivertes to Manatee/Martin/West County for MON 21,433,1	Н [МИВТU]	BROOKER = STREAM 1 = /EST PALM = GNGS = GNGS =	1.0280 1.0230 1.0270 1.0300 1.0300	#REFI #REFI HEAT VALUE APPLICABLE TO: PPN, PSN, PCC Manatee/FitMyer PMR, PRV, PPE, PFL, PCU, PTF MANATEE MARTIN	249,535,373.32
ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONT EQUIVALENT UNIT PRICE FOR CURRENT MONTH [\$IMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 43,997,767 [MMBTU] Guilistream deliveries to Manatee/Martin/West County for MON 21,433.1	Н [МИВТU]	BROOKER = STREAM 1 = /EST PALM = GNGS =	1.0280 1.0230 1.0270 1.0300	#REFI #REFI #REFI HEAT VALUE APPLICABLE TO: PPN, PSN, PCC Manatee/FiMyer PMR, PRV, PPE, PFL, PCU, PTF MANATEE	249,535,373.32
ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONT EQUIVALENT UNIT PRICE FOR CURRENT MONTH [\$IMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 43,997,767 [MMBTU] Gulfstream deliveries to Manates/Martin/West County for MON PENELOPE WILL SUPPLY 64,830,8:	Н [МИВТU]	BROOKER = STREAM 1 = /EST PALM = GNGS = GNGS = GNGS =	1.0280 1.0230 1.0270 1.0300 1.0300	#REFI #REFI #REFI HEAT VALUE APPLICABLE TO: PPN, PSN, PCC Manatee/FitMyer PMR, PRV, PPE, PFL, PCU, PTF MANATEE MARTIN WEST COUNTY	
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Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dist. 20170001-EI; ACN 2017-048-4-1;
Description: WY US - Her Company

SOURCES: 1 char a Rana, 170 (more that conscients of College and Letter, E. Lindar, O. Guesaw, P. Batta, 1575FE

13-GCR 2016 00.018.xi4s. AUG RPT 9/7/2017 9:50 AM

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 48-6.16

[Page 1]

Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month

NAT	URAL GAS SALES SU	MMARY			August-2016
					. ali1
NETTING OF SALES WITH PURCHAS	ES MMBTU	[\$/MMBTU]		AMT OWED TO FPL [\$]	- CA
Α	В	С		D	
				_	Note 1 Note 1
				7	
Subtotal					Book to 3305000 I/O 6370000482
ADJUSTMENTS/SALES					(Property Acctg. 232.135.611.790)
FGT FGT GULFSTREAM	\$ - \$:	\$:	Note 2 Note 3
GULFSTREAM FGT GULFSTREAM	- \$ - \$	-	\$ \$ \$	· -	Note 2 Note 3 Note 4
· if thi	This will change a bit s is a credit move to the Exper	nse tab	•	-	Note 4
Subtotal	-		\$	-	Book to 2009900 I/O 6370000498
	E			F	(Property Acctg. 143.450)
GRAND TOTAL				48-60	(15

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001:EI; ACN 2017-048-4-1;
Description: WE The Forest Activities



DECEMBER 2016 SUMMARY

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•	Α
PROCUREMENT PURCHASES	48-8.10
GAS RESERVES	
TRANSPORTATION	48-8.10
STORAGE	3 48-8.10
FINANCIAL SETTLEMENTS	4
PROCUREMENT SALES - CURRENT MONTH ONLY	18-8.11
NOX ALLOWANCES*	6
OPTI SALES - CURRENT MONTH ONLY	7
TOTAL .	
TOTAL.	\$ 190,725,428.79 48-8.1 +
PHOENIX - TOTAL GAS	\$ (190,725,429.20)
DIFFERENCE	\$ (0.41)

*Note: Nox Allowances are not part of fuel, these deals are under the Electric Commodity in Phoenix

CONFIDENTIAL

Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001-EI; ACN 2017-048-4-1;
Description: WOUS - HEGGIOS ACTIVITIES



REPORT PREPARED BY: Jennifer Chen December-7016 COMPIDENTIAL PHONE #: SET-594-949 MONTHLY GAS CLOSING REPORT

BEASES. SURSECUENTLY ADDIOSTED BY ACCOUNTED THE FOR PRIOR I ADJUSTMENTS 209,052,991,10 ITO BE PAID IN FOLLOWING MONTH! THE PARTY OF THE PROPERTY OF THE UNIT PRICE [\$/MMBTU] SUPPLIER NAME QNTY (MMBTU) INVOICE AMT [\$] COMMENTS **BP Energy Company** 2 Chevron Natural Gas ConocoPhillips **Continental Resources** 6 Cross Timbers Energy Services Davon Gas Services Direct Energy Business Marketing DTE Energy Trading **EnCana Marketing** 10 Enl Trading & Shipping **Enstor Energy Services** 13 Enterprise Products 14 EQT Energy 15 ETC Marketing LTD 16 Exelon Generation 17 Houston Pipe Line Macquarle Energy Mercuria Energy NJR Energy Services Noble Energy Inc. Occidental Energy Marketing Range Resources Sempra Gas & Power Marketing Sequent Energy Shell Energy North America (US), L.P. [SENA (US)] Spire Marketing, Inc. [LERI] Tampa Electric Company [TEC] Targas Gas Marketing Tenaska Marketing Texia Energy TraliStone NA Logistics Adj: between Proc and Opti Subtotal for Gas Purchases 48-8.9 BAY GAS STORAGE - DEC PROCUREMENT ACTIVITY BAY GAS STORAGE - DEC OPTI ACTIVITY Subtotal for Storage Inventory

18

21

27

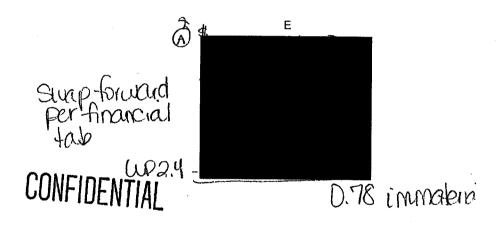
31

SOURCE

TOTAL - SUPPLY Line 1 49,346,374 3.2371 \$ 159,736,668,10 SUMMARY BY NATURAL GAS TRANSPORTER ONTY (MMBTU) F INVOICE AMT [\$] December-2016 TRANSPORT TYPE & CONTRACT NUMBER ISMMBTU COMMENTS FGT - FTS1 RESERVATION CHARGE (# 3247) FGT - FTS1 USAGE CHARGE (# 3247) FGT - FTS2 RESERVATION CHARGE (# 3223) FGT - FTS2 USAGE CHARGE (# 323) FGT - FTS2 USAGE CHARGE (# 102139) FTS1 - FIRM TRANSPORT 11/01/89 thru 07/31/2025 FTS1 - FIRM TRANSPORT 11/01/89 thm 07/31/2025 FTS2 - FIRM TRANSPORT 10/14/94 thm 02/28/2025 FTS2 - FIRM TRANSPORT 10/14/94 thm 02/28/2025 FGT - FT83 RESERVATION (#111145) FGT - FT83 USAGE CHARGE (#111145) Contract Term - Effective 4/1/11 for 25 years. Contract Term - Effective 4/1/11 for 25 years. FGT - (#5496) GULFSTREAM RESERVATION CHARGE (#09028411) GULFSTREAM USAGE CHARGE (#08028411) GULFSTREAM RESERVATION CHARGE (#9000828) tract Term Feb 8, 2008 through Oct 01, 2032 Contract Term Feb 8, 2008 through Oct 01, 2032 Contract Term June 1 2005 through June 2028 Firm Transport per Gulfstream Transportation Journal GULFSTREAM USAGE (#9000828) GULFSTREAM USAGE (#9008626) GULF SOUTH PIPELINE RESERVATION CHARGE (#40097) GULF SOUTH PIPELINE USAGE CHARGE (#40097) GULFSTREAM USAGE (#9006526) Apr thru Oct Only - Through 2017 Apr thru Oct Only - Through 2017 **GULF SOUTH PIPELINE RESERVATION CHARGE (#41618)** Contract Term Apr 1, 2015 through Mar 31, 2025 Contract Term Apr 1, 2015 through Mar 31, 2026 GULF SOUTH PIPELINE USAGE CHARGE (#41618)
GULF SOUTH PIPELINE RESERVATION CHARGE (#41619) Contract Term Apr 1, 2015 through Mar 31, 2025 Contract Term Apr 1, 2015 through Mar 31, 2025 Contract Term Apr 2, 2016 through Mar 31, 2025 Contract Term Sep 6, 2008 through Sep 5, 2020 GULF SOUTH PIPELINE USAGE CHARGE (#41619) SESH RESERVATION CHARGE (#840001) SESH USAGE CHARGE (#840001) Contract Term Sep 6, 2008 through Sep 5, 2020 Contract Term Sep 6, 2008 through Sep 5, 2020 Contract Term Sep 6, 2008 through Sep 5, 2020 SESH RESERVATION CHARGE (#840002) SESH USAGE CHARGE (#840002) BESH RESERVATION CHARGE (#840097-R2) Contract Term Jan 1, 2012 through Dec 31, 2017 Contract Term Jan 1, 2012 through Dec 31, 2017 SESH USAGE CHARGE (#840097-R2)
TRANSCONTINENTAL USAGE CHARGE (#8108621) TRANSCONTINENTAL RESERVATION CHARGE (#9114388)
TRANSCONTINENTAL USAGE CHARGE (#9114388)
TRANSCONTINENTAL USAGE CHARGE (#9108621) REBUNDLED - FGT Imbalance - Gulfstream REBUNDLED FIRM TRANSPORT REBUNDLED FIRM TRANSPORT Subtotal for Transportation 48-8.9 BAY GAS STORAGE (Monthly Charge on 2.5 MM Capacity including Subtotal for Storage Costs 48-8.9 FGT - Turkey Point Compressor Station #22 FGT - Capa Canaveral Compressor Station #32 FGT - Pompano Beach Compressor Station #21.5 Subtotal for Adjustments Less: PPA Transportation (December True-up)
TOTAL Desoto contract expires December 31, 2012 Line 2 132,655,932 0.3718 49,316,323.00 **GAS RESERVES** UNIT PRICE [\$/MMBTU] OWED TO QNTY (MMBTU) CUMULATIVE REDUCTION (\$) COMMENTS Gas Reserves - Physical #DIV/0 Gas Reserves MDIV/01 to Customers for Gas Reserves Project - 3/15-6/16) TOTALA 13-GCRA 1016 12als also DEC E UNICAR, DÍJSÚSSOVI, P. BILYTH, JSTEFFEN 0.00

48-811

OTHER MISCELLANEOUS EXPENSES INCURRED FOR CURRENT POTH:		MONTHLY GAS CLOSH				
TO BE PAID IN FOLLOWING MONTH, UNLESS NOTED OTHERWIT			₽	RI <u>OR I</u>	ADJUSTMENTS!	
OWED TO QN	UNIT F TY [MMBTU] (\$/MM		B INVOICE ANT (\$)	COMMEN	its	,
FGT Financial Activity Yower Related Financial Activity (correction Jan thru Dec 2016) Total Financial Activity Related to Fuel Expense		48-8,	17 48-8.9	REFERT	O FINANCIAL ATTACHMENT	
Colal Adjustments COTAL		48-	S.I.	REFER TO	D EXPENSE ATTACHMENT	
ARMS (MISC, BILLS) FOR MONEY RECEIVED DURING CURRENT MONTH:				\$		C
ROM CARL	UNIT PI		D AMT RECEIVED (\$)			
ales		110.00	AM I RECEIVED (3)	COMMEN	IS	
Adjustments Optimization Sales		48-819-6-5	Ŧ,	REFER TO	SALES TAB	
OTAL		118-8.12			OPTIMIZATION SALES TAB	(reter to lab for co
ET CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT MONEY.				**************************************		
				3		194,208,908.61
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU]				3		194,208,808.61 43,814,538
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU]				3		
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU] QUIVALENT UNIT PRICE FOR CURRENT MONTH [\$MMBTU]				3		43,814,538
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU]	FOT STATE				JE APPLICABLE TO:	43,814,538
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU] DUIVALENT UNIT PRICE FOR CURRENT MONTH [\$/MMBTU] FOT "GAS DAY" ENERGY MEASURED for MONTH	FGT STATI BROOKE PERRY STREAM	R= 1.0	JE (MMBTU/MCF) 230 230	PPN, PSN,	PGC	43,814,538
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU] QUIVALENT UNIT PRICE FOR CURRENT MONTH [SAMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 26,102,836 [MMBTU]	BROOKE PERRY STREAM	R≈ 1.0 1≈ 1.0	230 230	PPN, PSN, i Manatee/Fi	PGC Myer	43,814,538
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU] QUIVALENT UNIT PRICE FOR CURRENT MONTH [\$4MMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 26,102,836 [MMBTU]	BROOKE PERRY STREAM WEST PAU	R= 1.0 1= 1.0	230 230 220	PPN, PSN, i Manatee/Fi PMR, PRV,	PGC	43,814,538
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU] DUIVALENT UNIT PRICE FOR CURRENT MONTH [SAMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 26,102,836 [MMBTU] UKstream deliveries to Manated/Martin/West County for MONTH 17,646,849	BROOKE PERRY STREAM WEST PALI GNG GNG	R= 1.0 1= 1.0 U= 1.0 3= 1.0 8= 1.0	230 230 220	PPN, PSN, i Manatee/Fi PMR, PRV, MANATEE	PGC Myer	43,814,538
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU] QUIVALENT UNIT PRICE FOR CURRENT MONTH [SAMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 26,102,836 [MMBTU] UNStream deliveres to Manatee/Martin/West County for MONTH 17,645,949 43,651,765	BROOKE PERRY STREAM WEST PAU GNG	R = 1.0 1 = 1.0 4 = 1.0 9 = 1.0 6 = 1.0	2210 2230 2220 226 256	PPN, PSN, i Manatee/Fi PMR, PRV,	PGC Myer PPE, PFL, PGU, PTF	43,814,538
26,102,836 MMBTU UKstream deliveries to Manatee/Hartin/West County for MONTH 17,645,949	BROOKE PERRY STREAM WEST PALI GNG GNG	R = 1.0 1 = 1.0 4 = 1.0 9 = 1.0 6 = 1.0	2210 2230 2220 226 256	PPN, PSN, i Manatee/Fi PMR, PRV, MANATEE MARTIN	PGC Myer PPE, PFL, PGU, PTF	43,814,538
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU] QUIVALENT UNIT PRICE FOR CURRENT MONTH [SAMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 26,102,836 [MMBTU] UNStream deliveres to Manatee/Martin/West County for MONTH 17,645,949 43,651,765	BROOKE PERRY STREAM WEST PALI GNG GNG GNG	R = 1.0 1 = 1.0 4 = 1.0 9 = 1.0 6 = 1.0	2210 2230 2220 226 256	PPN, PSN, i Manatee/Fi PMR, PRV, MANATEE MARTIN	PGC Myer PPE, PFL, PGU, PTF	43,814,538
NERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU] DUIVALENT UNIT PRICE FOR CURRENT MONTH [\$MMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 26,102,836 [IMBTU] UNStream deliveries to Manatee/Martin/West County for MONTH 17,648,949 43,651,785	BROOKE PERRY STREAM WEST PALI GNG GNG	R = 1.0 1 = 1.0 4 = 1.0 9 = 1.0 6 = 1.0	2210 2230 2220 226 256	PPN, PSN, Manatee/Fil PMR, PRV, MANATEE MARTIN WEST COU	PCC Myer PPE, PFL, PCU, PTF NTY	43,814,538



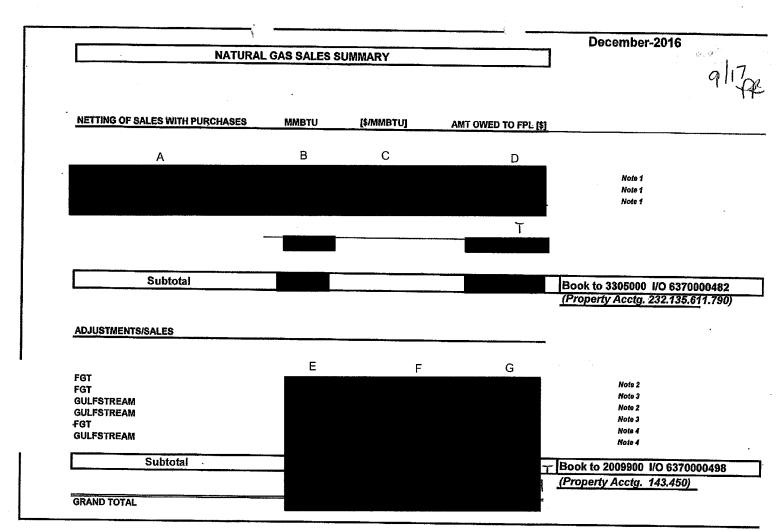
Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001-EI; ACN 2017-048-4-1;
Description: WP 48 - HEGGING ACTIVITIES

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 48-8.12

[Page 1]

Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month



NOTES:

- 1 · Netting Purchases
- 2 Nov Underburn Accrual Reversal
- 3 Nov Underburn Actual
- 4 Dec Underburn Accrual

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Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20176001-E1; ACN 2017-048-4-1;
Description: WP 46 - Hedging Ach vrices



FEBRUARY 2017 SUMMARY

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	48-10.11
PROCUREMENT PURCHASES	1
GAS RESERVES	
TRANSPORTATION	2 48-10.11
STORAGE	3 48-121
FINANCIAL SETTLEMENTS	48-10.12
PROCUREMENT SALES - CURRENT MONTH ONLY	5 48-10.12
MISCELLANEOUS	110 10 10
OPTI SALES - CURRENT MONTH ONLY	6 48-10.12
TOTAL	\$ 171,847,380.67
PHOENIX - TOTAL GAS	48-10.12 T \$(171,847,380.67)
DIFFERENCE	\$

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Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001-EI; ACN 2017-048-4-1;
Description: WOHE-HEGING ACTIVITIES



^{*}Note: Nox Allowances are not part of fuel, these deals are under the Electric Commodity in Phoenix

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Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dia. 2017:001-E1; ACN 2017-448-4-1;
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48-10.11

as Reserves - Physical as Reserves - Transportation	#DIV/0 #DIV/0	0.0 0.0	Λ	
using a the low the Line (Refund to Customers for Gas Res	*(oject - 3/15-6)16)			The State of The S
fal.	0	0.00		
HER MISCELLANEOUS EXPENSES INCURRED FOR CURRENT D BE PAID IN FOLLOWING MONTH, UNLESS NOTED OTHERWIS	MONTH: SEJ		\$	А
ED TO	QNTY [MMBTU] [\$/MMBTU]		COMMENTS	
T Financial Activity		48-		<u>-</u>
tal Financial Activity Related to Fuel Expense	,			
	•		<u></u>	
tal Adjustments			REFER TO EXPENSE ATTACHMENT	
PTAL				
RMS (MISC, BILLS) FOR MONEY RECEIVED DURING CURRENT	MONTH:		\$	С
	UNIT PRICE	D		
OM	CARMS INVOICE [\$/MMBTU]			
		AMT RECEIVED (\$)	COMMENTS	
les Histografia		-10.16	48-10.10	
les djustments olimization Sales		-10.16	48-(0.10 TREFER TO SALES TAB	
fjustments otimization Sales			48-10.10	(refer to tab for
ljustments ntimization Sales		-10.16	48-(0.10 TREFER TO SALES TAB	(refer to tab for
fjustments olimization Sales TAL	——————————————————————————————————————	-10.16	48-(0.10 A refer to sales tab A refer to optimization sales tab	
djustments plimization Sales TAL T CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT M	— 48 — 48	-10.16	48-(0.10) AREFER TO SALES TAB REFER TO OPTIMIZATION SALES TAB	(refer to tab for
ijustments nimization Sales TAL T CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT M ERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [— 48 — 48	-10.16	48-(0.10) AREFER TO SALES TAB REFER TO OPTIMIZATION SALES TAB	
ijustmenta ntimization Sales TAL T CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT M ERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [— 48 — 48	-10.16	48-(0.10) AREFER TO SALES TAB REFER TO OPTIMIZATION SALES TAB	
Alustments TAL TGASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT A ERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [UWALENT UNIT PRICE FOR CURRENT MONTH [SYMMBTU]	— 48 — 48	3-10°: 1 3-10°:4	48-(0.10) AREFER TO SALES TAB REFER TO OPTIMIZATION SALES TAB	
Ulustments TAL TCASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT M ERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [UNVALENT UNIT PRICE FOR CURRENT MONTH [SYMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH	— 48 — 48	-10.16	48-(0.10) AREFER TO SALES TAB REFER TO OPTIMIZATION SALES TAB \$ #REFT	
(Unitation) Sales TAL T CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT M ERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [UNALENT UNIT PRICE FOR CURRENT MONTH [SMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 25,486,521	4 LLS —— 48 AONTH MMBTUJ FGT STATION BROOKER =	AVG HEAT VALUE [MISTUMCF] 1.0290	48-(0.10) AREFER TO SALES TAB REFER TO OPTIMIZATION SALES TAB	
Ijustmenta Titimization Sales TAL T CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT M ERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [IJUNALENT UNIT PRICE FOR CURRENT MONTH IJUNALENT UNIT PRICE FOR CURREN	4 STATION	AVG HEAT VALUE	48-(0.10) REFER TO SALES TAB REFER TO OPTIMIZATION SALES TAB **REFT #REFT #REFT	
Ijustments ritimization Sales TAL T CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT M ERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [UNVALENT UNIT PRICE FOR CURRENT MONTH [S/MMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 25,486,521 [MMBTU] **Stream deliveries to Manatoc/Martin/West County for MONTH	4 LLS —— 48 AONTH MMBTUJ FGT STATION BROOKER =	AVG HEAT VALUE [MISTUMCF] 1.0290	#REFER TO SALES TAB REFER TO OPTIMIZATION SALES TAB #REFI #REFI #REFI #REFI #REFI #REFI #RAT VALUE APPLICABLE TO: PPN, PSN, PCC Manatea/FitMyer	
Ijustmenta Titimization Sales TAL T CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT M ERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [IJUNALENT UNIT PRICE FOR CURRENT MONTH IJUNALENT UNIT PRICE FOR CURREN	# LUST AND THE PARTY OF THE PAR	AVG HEAT VALUE [MMBTUMOF] 1.0290 1.0268 1.0205	#REFER TO SALES TAB REFER TO OPTIMIZATION SALES TAB #REFI #REFI #REFI HEAT VALUE APPLICABLE TO: PPN, PSN, PCC	
Ijustmenta plimization Sales TAL T CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT MERCEIVED (NET OF FUEL) DURING CURRENT MONTH [SAMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 25,488,521 [MMBTU] Histream deliveries to Manatee/Martin/West County for MONTH 15,017,884	FGT STATION BROOKER = PERRY STREAM 1 = WEST PALM = GNGS = GNGS =	AVG HEAT VALUE [MMBTUMCF] 1.0290 1.0268 1.0200 1.0205	#REFT	
Alustments Alimization Sales TAL T CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT A ERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [INVALENT UNIT PRICE FOR CURRENT MONTH [INVALENT UNIT PRICE FOR CURRENT MONTH INVALENT UNIT UNIT UNIT UNIT UNIT UNIT UNIT UN	# LUST AND THE PARTY OF THE PAR	AVG HEAT VALUE [MMBTUMOF] 1.0290 1.0268 1.0205	#REFER TO SALES TAB REFER TO SALES TAB #REFI #REFI #REFI #REFI HEAT VALUE APPLICABLE TO: PPN, PSN, PCC Manatea/Fith/yer PMR, PRV, PPE, PFL, PCU, PTF MANATEE	
justments timization Sales TAL T CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT M ERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [SIMMBTU] FGT "GAS DAY" ENERGY MEASURED for MONTH 25,486,521 [MMBTU] Istream deliveries to Manatee/Martin/West County for MONTH 15,017,884	FGT STATION BROOKER = PERRY STREAM 1 = WEST PALM = GNGS = GNGS =	AVG HEAT VALUE [MMBTUMCF] 1.0290 1.0268 1.0200 1.0205	#REFT	

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Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001-EI; ACN 2017-048-4-1;
Description: WP 48 - Hedging Activities

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Hedging Audit Workpaper Number 48-10.13

[Page 1]

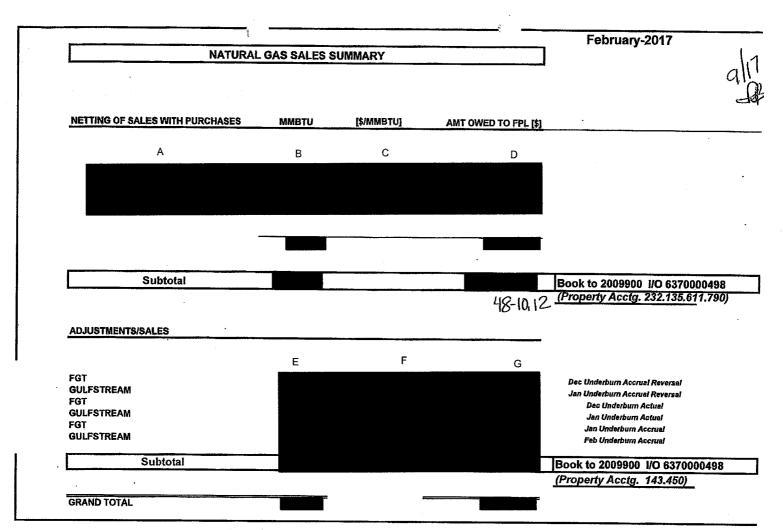
Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month

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Hedging Audit Workpaper Number 48-10.14

[Page 1]

Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month



NOTES:

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Florida Power & Light Company
Hedgiog Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001-EI; ACN 2017-048-4-1;
Description: WP +& - Herical Activities



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April 2017 SUMMARY

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		48-12.11
PROCUREMENT PURCHASES	1	D MIII
GAS RESERVES		_
TRANSPORTATION	2	48-12,11
STORAGE	3	46-12,11
FINANCIAL SETTLEMENTS	4	48-12.12
PROCUREMENT SALES - CURRENT MONTH ONLY	5	48-12,12
MISCELLANEOUS		116 10 10
OPTI SALES - CURRENT MONTH ONLY	6	48-1212
TOTAL		\$ 212,302,294.40
PHOENIX - TOTAL GAS		48-12.12 T \$(212,302,294.40)
Jan overburn adjustment		(4,915.98)
March SWAP adjustment		77,384.16
DIFFERENCE		\$ 72,468.18

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*Note: Nox Allowances are not part of fuel, these deals are under the Electric Commodity in Phoenix

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Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001-EI; ACN 2017-048-4-1;
Description: WP US - HEAGING ACTIVITIES

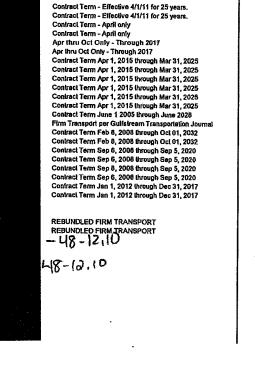




For the Twelve Months Ended July 31, 2017
Dkt. 20170001-EI; ACN 2017-0494-1;
scription: WP 48- Hadgung ACh 1/1-be.S

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Demand Usage & Demand Demand Usage & Demand



REBUNDLED - FGT

Imbalance - Gulfsfream

FGT - Cape Canaveral C

FGT - FTS3 RESERVATION (#111145)

FGT - FT93 USAGE CHARGE (#111145)

FGT - FTS3 RESERVATION (#119233) FGT - FTS3 USAGE CHARGE (#119233)

GULFSTREAM USAGE (#09000828)

GULF SOUTH PIPELINE RESERVATION CHARGE (#40097) GULF SOUTH PIPELINE USAGE CHARGE (#40097)

GULF SOUTH PIPELINE RESERVATION CHARGE (#41618) GULF SOUTH PIPELINE USAGE CHARGE (#41618)

GULF SOUTH PIPELINE RESERVATION CHARGE (#41619)
GULF SOUTH PIPELINE USAGE CHARGE (#41619)

GULF SOUTH PIPELINE RESERVATION CHARGE (#41619)
GULF SOUTH PIPELINE USAGE CHARGE (#41619)

SESH USAGE CHARGE (#940097-R2)
TRANSCONTINENTAL RESERVATION CHARGE (#9114388)
TRANSCONTINENTAL USAGE CHARGE (#9114388)

BAY GAS STORAGE (Monthly Charge on 2.5 MM Capacity including Subtolal for Storage Costs

mpressor Station #32

Subtotal for Transportation

GULFSTREAM RESERVATION CHARGE (#09080828)

GULFSTREAM RESERVATION CHARGE (#09028411)

GULFSTREAM USAGE CHARGE (#09028411) SESH RESERVATION CHARGE (#840001)

SESH USAGE CHARGE (#840002) SESH RESERVATION CHARGE (#840097-R2)

FGT - Turkey Point Compressor Station #22

SESH USAGE CHARGE (#840001) SESH RESERVATION CHARGE (#840002)

	Α	В	С		1
Less: PPA Transportation (December True-up) TOTAL					
GAS RESERVES				To apply	1 11
	TV (MIDTII)	UNIT PRICE [\$/MMBTU]	CUMULATIVE REDUCTION (\$)	COMMENTS	allog
•	тү [ммвти]			COMMENTS	- CIP
Gas Reserves - Physical Gas Reserves - Transportation		#DIV/01 #DIV/01	0.00 0.00		
Adjustment Balow the Line (Refund to Customers for Gas Reserves Project	- 3/15-6/16}	· jagi	ang en en en en	A CHANGE SHOWS ON THE REPORT	
TOTAL	0		0.00		
					J
OTHER MISCELLANEOUS EXPENSES INCURRED FOR CURRENT MONTH: [TO BE PAID IN FOLLOWING MONTH, UNLESS NOTED OTHERWISE]			-	, D	
OWED TO QN	TY (MMBTU)	UNIT PRICE [\$MMBTU]	E INVOICE AMT (\$)	COMMENTS	
FGT Financial Activity March Swap adjustment Total Financial Activity Related to Fuel Expense		⊣ 8∙	-12.19	Adjust for Feb Swap picked up in March Swap closing	
Total Adjustments.		48	-12.13	REFER TO EXPENSE ATTACHMENT	
CARDING (INC. DIV. A) FOR VIOLENT OF STATE OF ST				<u>E</u>	7
CARMS (MISC. BILLS) FOR MONEY RECEIVED DURING CURRENT MONTH:					,
FROM CARM	IS INVOICE	UNIT PRICE [\$/MMBTU]	AMT RECEIVED (\$)	COMMENTS	. Î
Sales Adjustments	•	48	13.11	46-12 (10 REFER TO SALES TAB	
Optimization Sales		48	·12.14	REFER TO OPTIMIZATION BALES TAB (refer to tab for 48-12-10)	r coding)
TOTAL				46-12-10	
NET CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT MONTH ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH [MMBTU] EQUIVALENT UNIT PRICE FOR CURRENT MONTH [MMBTU]				\$ (19,115,429,94) #REF!	
			AVG HEAT VALUE		_ 1 .
FGT "GA8 DAY" ENERGY MEASURED for MONTH 33,263,577		FGT STATION BROOKER =	[MMBTU/MCF] 1.0250	HEAT VALUE APPLICABLE TO: PPN, PSN, PCC	,
[ммвти]	PERRY	STREAM 1 =	1.0210	Manatee/FtMyer	
Gulfstream deliveries to Manatee/Martin/West County for MONTH 18,829,853	V	VEST PALM = GNGS =	1.0210 1.0217	PMR, PRV, PPE, PFL, PCU, PTF MANATEE	
52,093,539		gngs = gngs =	1.0217 1.0217	MARTIN WEST COUNTY	
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D:\(113-GCRA 2017 04xis.xisx)APR Report					
#REFI		PROOF \$	212,302,294.40 A	L GCR	
		1·\$ \$	(212,302,294,49)	PHOENIX 48-12(1) H	
			VA/I	P 2.8	
			VY		
				(A)	
				$\mathbf{O}_{\mathbf{A}}$	
	17/	He	wer & Light Compan dging Activities	·	eaf vrus len finan te
	I -)kt. 20170001		1,2017 8-4-1; ictivities	

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Hedging Audit Workpaper Number 48-12.13

[Page 1]

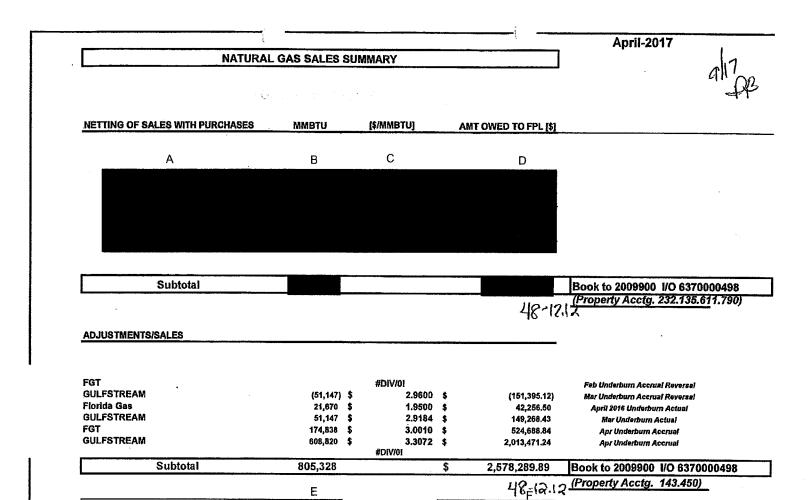
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Hedging Audit Workpaper Number 48-12.14

[Page 1]

Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month



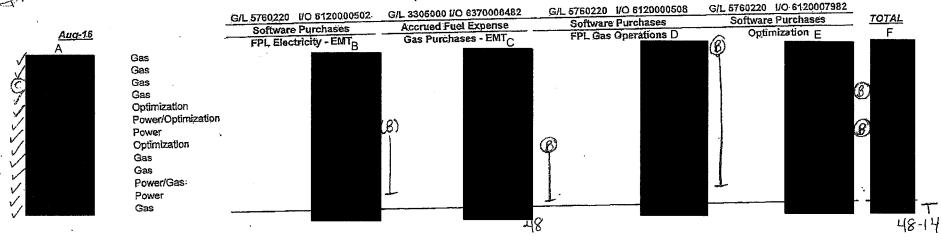
NOTES:

GRAND TOTAL

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Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001-E1; ACN 2017,048,4-1;
Description: WY UK — HEGGING ACTIVITIES





Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 2017001-E1; ACN 2017-048-4-1;
Description: YP 48 - Brollet age: FCCS

Note (A): Name of trader traced to Appendix A of the EMT Trading and Risk Management Procedures Manual. 1 (48-16.20)

Note (B): See WP 10-6.2.

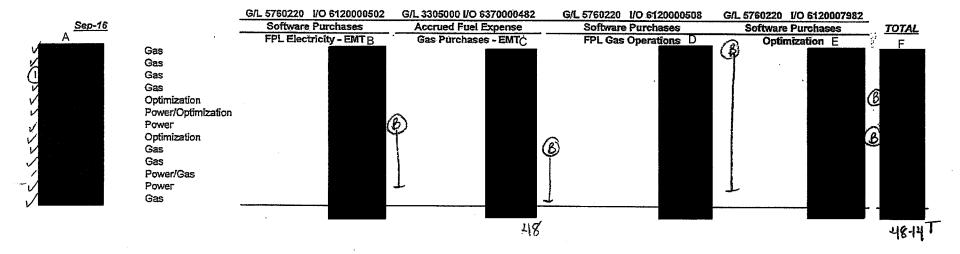
Note (C): Sa WP 10-17,1

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OR RESPONSE L

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Mole(1): See WP 10-17.1
for detailed six lancetion
as to why make not listed in Manual.

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Florida Power & Light Company **Hedging Activities** For the Twelve Months Ended July 31, 2017 Dkt. 20170001-E1; ACN 2017-048-4-1; Description: WP 18 - BTO Kerage Sec

Note (a): Name of tracles traced to appendix a of the EMT Fracting and Risk Hanagement Procedures Hanual. V (WP48-16.20)
Note (B): See WP 10-6.2.

Florida Power & Light Company Hedging Activities For the Twelve Months Ended July 31, 2017 Dkt. 20170001-E1; ACN 2017-048-4-1; Description: WP 48 - 1310 Ketale FEE

G/L 5760220 I/O 6120007982 G/L 5760220 VO 6120000508 G/L 5760220 I/O 6120000502 G/L 3305000 I/O 6370000482 TOTAL Accrued Fuel Expense Software Purchases Software Purchases Software Purchases Oct-16 Optimization E FPL Electricity - EMTR FPL Gas Operations D Gas Purchases - EMTC Gas Gas Gas **(B)** Optimization Power/Optimization Power Optimization Gas Gas Power/Gas Power Gas

note (1): Sec LUP 10-17.1 for distanced extranation as to why name not lusted in Hannal

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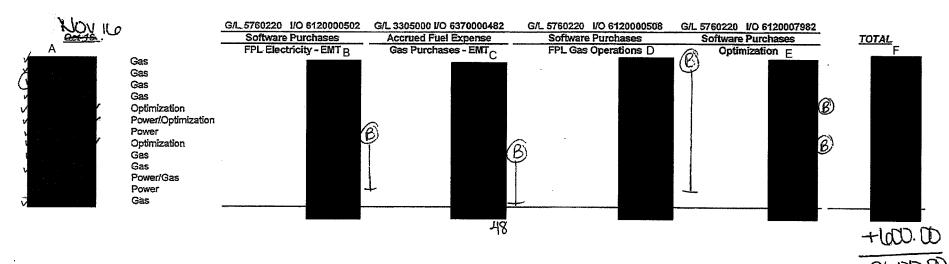
Note (a): Plane of chader to appendix a of the EMT - hading and Risk Haragement Procedures Vanual, 1 (WP48-16.20)

Note (B): See WP 10-6.2

(PBV) OR Response 6

SOURCE

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Note (1): See WP 10-17.1 Jei detailed Explanation as to why miss not loted in Manual.

Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dist. 20170001-EI; ACN 2017-048-4-1;
Description: WP UB - DYOKATOGA FEES

note (a): Name of strades straced to appendix a of the ENT diading and Rick Haragement Procedures Manual. / (WP48-16.20)

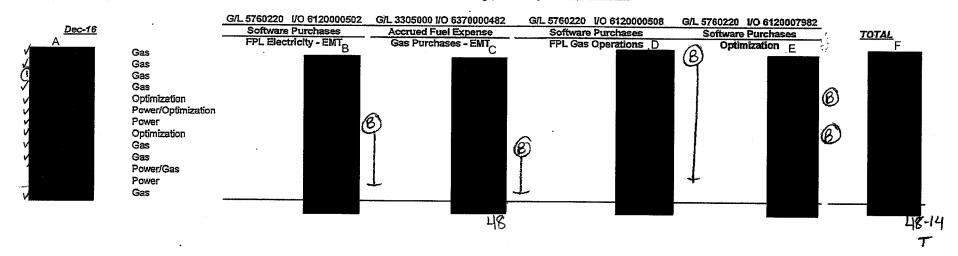
Note (B): Sec WP 10-10.2

(PBC) DR RESTONSE 6

OURCE



Florida Power & Light Company Hedging Activities For the Twelve Months Ended July 31, 2017 Dkt. 20170001-E1; ACN 2017-048-4-1; Description: WP 48 - Brokerage Fcas



Mote (1): See WP 10-17.1 for detailed explanation as to why name not luted in Manual.

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Note (a) Name of stracter straced to appendix a y the EMT Trading and Risk Management Procedures Manual. / (WP48-16.20)

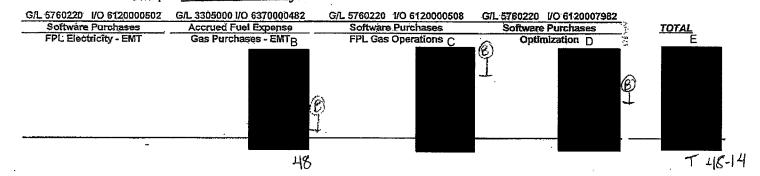
Note (B): See WP 10-10.2

SOURCE

Florida Power & Light Company Hedging Activities For the Twelve Months Ended July 31, 2017

Dkt 20170001-EI; ACN 2017-048-4-1; n: W 48 - Diokerage Fees

<u>Jan-17</u>	
A	Gas Gas Gas Optimization Optimization Gas Gas Gas



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After (A): Name of itrader traced to appendix a of the EMT finding and Roke Haragement Procedures Manual / (WP48-16.20)

Nute (B): See WP 10-6.2

(PBC)



Florida Power & Light Company Hedging Activities For the Twelve Months Ended July 31, 2017 Dkt, 20170001-El; ACN 2017-048-4-1;

escription: WP 48 - Brokerage Fees

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G/L 5760220 I/O 6120000502 Software Purchases	G/L 3305000 I/O 6370000482 Accrued Fuel Expense	G/L 5760220 I/O 6120000508 Software Purchases	G/L 5760220 I/O 6120007982 Software Purchases	TOTAL
FPL Electricity - EMT	Gas Purchases - EMT	FPL Gas Operations C	Optimization D	TOTAL E
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note (a): Plance of thoder thousand to appendix a of the Emg Finding and Rick Maragement Floordina Manual V (WF48-16.20)

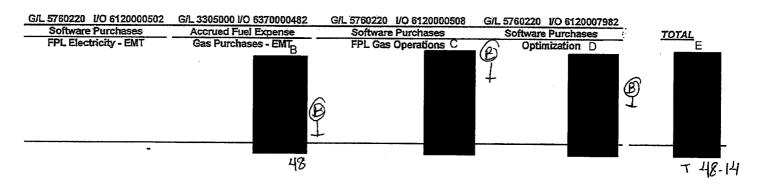
4 role (B): Sa WP 10-6.2

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Florida Power & Light Company **Hedging Activities** For the Twelve Months Ended July 31, 2017

Dkt. 20170001-EI; ACN 2017-048-4-1:

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Note (a): Name of the utiacle itiaced to appendix a y the EMT finding and Riok Management Growdium Manual. 148-16.20

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Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001-EI; ACN 2017-048-4-1;
ription: WP 48 — Brokerage Fees

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Tote (A): Name of thader thraced to Ciffendix a of the EMT Juding and Rok Maragement Procedure Manual. V (WP48-16.20)

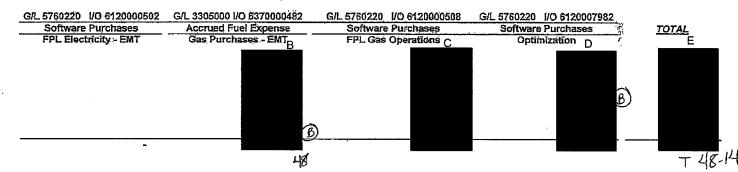
Note (B): See WP 10-6.2

OP Response 6

Florida Power & Light Company Hedging Activities

For the Twelve Months Ended July 31, 2017 Dkt. 20170001-EI; ACN 2017-048-4-1; WP 48 - Brokerage Fees

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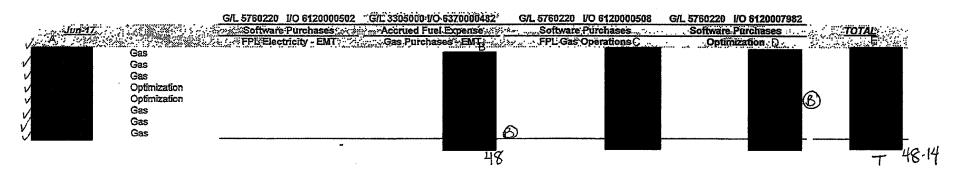
CONFIDENTIAL

Note (a): Name of strader traced to Coppendix a of the EMT Trading and Rick Hanagement Procedures Manual. (WP48 16.20)

Note (B): See WP 10-6.2



Florida Power & Light Company Hedging Activities For the Twelve Months Ended July 31, 2017 Dkt. 20170001-E1; ACN 2017-048-4-1; Description: WP US - CAN LLAGE FEC.



CONFIDENTIAL

Note (a): Name of trader traced to appointing of the EMT Fading and Rick Management Procedures Manual, V (WP 48-16.20)

note (B) See WP 10-6.2

CON Response 6

Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001-E1; ACN 2017-048-4-1;
Description: WPUS-Pro VOCOCE Fee

CONFIDENTIAL

Note (a): Name of itender thraced to Cappardix of the EMT Flading and Rick Maragament Procedure Marine? V (WP 48-16.20)

Noto (B): Sac LUP 10-6.2

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Invoice

Page 1 of 1

ICE US OTC Commodity Mkts LLC

Florida Power & Light Company Florida Power & Light Company 700 Universe Bivd Juno Beach, FL 33408 U.S.A.

Customer ID: 000193

Invoice Date: Due Date: Involce No: Charge From: Charge To:

06/09/2017 07/09/2017 0517000193088 05/01/2017 05/31/2017

Amount B

48-14

Total Amount Due:

Description

Minimum Commission Fees for REVENUE LINE

Minimum Commission Fees for REVENUE LINE

Currency USD

USD

Sub Total:

Sales/Excise Tax Total:

Invoice Total:

-48-14,14

Michelle Doery

Managar , Portor & Fusis Accounting

ENTERED BY

(561) 691 AUTHORIZED BY:

BAP DOCUMENT #(8):

ACOT NUMBER

Florida Power & Light Company **Hedging Activities** For the Twelve Months Ended July 31, 2017 Dkt, 20170001-E1; ACN 2017-048-4-1; Description: WP 48 - Blove 100 4

To review and download invoice details, please log onto www.theice.com. For information regarding your user ID and password, please contact the ICE helpdesk at 770-738-2101.

Please remit the amount due within 30 days. Make sure to reference your Customer ID and/or your invoice number when making a payment. Please ensure bank charges are not deducted from the amount due. Payments should be made in one of the following methods:

Send Check To ICE US OTC Commodity Markets, LLC P.O. Box 935278 Allanta, GA 31193-5278

OR

Via Wire Transfer / ACH Beneficiary Name Receiving Bank Name Receiving Bank City and State **SWIFT Code** Receiving Banks ABA # **Crediting Account** Reference (invoice #)

ICE US OTC Commodily Markets, LLC Wells Fargo

Atlanta, GA 31193-5278



Questions?Email Accounting at Iceaccounting@theice.com



CONFIDENTIAL



Invoice

Page 1 of 1



ICE US OTC Commodity Mkts LLC

Florida Power & Light Company Florida Power & Light Company 700 Universe Blvd Juno Beach, FL 33408 U.S.A.

Customer ID: 000193

invoice Date: Due Date: Involce No: Charge From: 06/09/2017 07/09/2017 0517000193006 05/01/2017

Amount

Charge To: 1 Total Amount Due:

05/31/2017

Description Bilateral Physical Gas Fee

Currency USD

Sub Total:

Sales/Excise Tax Total:

Invoice Total:

48-14.13

note (1): Blateral Physical Los Fre us an exchange imembership file. Florida Power & Light Company

Hedging Activities
For the Twelve Months Ended July 31, 2017 Dkt. 20170001-E1;
Description: NP 48 - Pro ACN 2017-048-4-1; Lerage Fees

To review and download invoice details, please log onto www.theice.com. For information regarding your user ID and password, please contact the ICE helpdesk at 770-738-2101.

Please remit the amount due within 30 days. Make sure to reference your Customer ID and/or your invoice number when making a payment. Please ensure bank charges are not deducted from the amount due, Payments should be made in one of the following methods:

Send Check To ICE US OTC Commodily Markets, LLC P.O. Box 935278 Atlanta, GA 31193-5278

OR

Via Wire Transfer / ACH **Beneficiary Name** Receiving Bank Name Receiving Bank City and State SWIFT Code Receiving Banks ABA # Crediting Account

ICE US OTC Commodity Markets, LLC Wells Fargo

Allanta, GA 31193-5278

0517000193006

Questions7Email Accounting at Iceaccounting@theice.com

Reference (Involce #)

CONFIDENTIAL



Invoice

Page 1 of 1

ICE US OTC Commodity Mkts LLC

Florida Power & Light Company Florida Power & Light Company 700 Universe Bivd Juno Beach, FL 33408 U.S.A.

Customer ID: 000193

Invoice Date: Due Date: Invoice No:

07/12/2017 08/11/2017 0617000193088 06/01/2017

Charge From: Charge To:

06/30/2017

1 Total Amount Due:

Description

Minimum Commission Fees for REVENUE LINE

Minimum Commission Fees for REVENUE LINE

USI Manager Power & Fuels Account

Sales/Excise Tax Total:

Invoice Total:

Florida Power & Light Company Hedging Activities For the Twelve Months Ended July 31, 2017 ACN 2017-048-4-1; DIOKELOGE FEES Dkt. 20170001-EI;

PHONE: AUTHORIZED BY.

BAP DOCUMENT #(8)

ACCT NUMBER:

To review and download invoice details, please log onto www.thelce.com. For information regarding your user ID and password, please contact the ICE helpdesk at 770-738-2101.

Please remit the amount due within 30 days. Make sure to reference your Customer ID and/or your invoice number when making a payment. Please ensure bank charges are not deducted from the amount due. Payments should be made in one of the following methods:

Send Check To ICE US OTC Commodity Markets, LLC P.O. Box 935278 Atlanta, GA 31193-5278

OR

Via Wire Transfer / ACH Beneficiary Name Receiving Bank Name Receiving Bank City and State **SWIFT Code** Receiving Banks ABA # **Crediting Account** Reference (invoice #)

ICE US OTC Commodity Markets, LLC Wells Fargo

Atlanta, GA 31193-5278

0617000193088

Questions?Email Accounting at Iceaccounting@theice.com



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REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Numbers 48-16.17 through 48-16.26

Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy

Hedging Audit 2017 – Docket No. 170001 Audit Request No. 8



Q: Please provide Sarbanes Oxley 404 Compliance – Process Narrative and a statement explaining the compliance with separation of duties (front, middle and back office) is met.

A:

1) The process narratives associated with hedging activities have been included as part of this response

2) FPL incorporates proper separation of duties into all of its hedging activities. Separation of duties is specifically addressed in the NextEra Energy, Inc. Energy Trading



In addition, the Trading and Risk Management Procedures Manual provides additional detail, description, and explanation for the various activities outlined in the Policy. Compliance requirements, both individual and supervisory, are addressed within the Policy and Procedures documents. The Policy and Procedures manuals were provided in response to Hedging Audit Request No. 3.

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Florida Power & Light Company
Hedging Activities
For the Twelve Months Ended July 31, 2017
Dkt. 20170001-E1; ACN 2017-048-4-1;
Description: WP 48 - Sarmas Oxley Company



EXHIBIT C JUSTIFICATION TABLE

FIRST REVISED EXHIBIT C

COMPANY: TITLE:

Florida Power & Light Company List of Confidential Workpapers

AUDIT:

FPL, Hedging Audit 17-048-4-1

AUDIT CONTROL NO:

20190001-EI

DOCKET NO: DATE: May 6, 2019

Bold denotes revision to reduce the amount of confidential classification previously requested or a new declarant

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
2	Hedging Activity True-up Report filed on April 3, 2017 (January - December 2016)	1	N			
2.1	Hedging Activity True-up Report filed on April 3, 2017 (January - December 2016)	1	N			
2.2	Hedging Activity True-up Report filed on April 3, 2017 (January - December 2016)	1	N			
2.3	Hedging Activity True-up Report filed on April 3, 2017 (January - December 2016)	1	N			
2.4	Hedging Activity True-up Report filed on April 3, 2017 (January - December 2016)	1	N			
2.5	Hedging Activities Supplemental Report Filed on August 18, 2017	1	N			
2.6	Hedging Activities Supplemental Report Filed on August 18, 2017	1	N			
2.7	Hedging Activities Supplemental Report Filed on August 18, 2017	1	N			
2.8	Hedging Activities Supplemental Report Filed on August 18, 2017	1	N			
2.9	Hedging Activities Supplemental Report Filed on August 18, 2017	1	N	4		
2.10	Hedging Activities Supplemental Report Filed on August 18, 2017	1	N		N. T.	
2.11	Hedging Activities Supplemental Report Filed on August 18, 2017	1	N			
10-6.2	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declaran
10-6.3	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies	1	Υ	Lns. 1A-2A	(d), (e)	G. Yupp
10-6.4	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies	1	N			
10-6.5	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies	1	N			
10-7.1	Organization chart for the hedging activities personnel, the names, titles, duties of the personnel, and any changes of personnel since the last audit.	1	N			
48	Reconciliation to the Filing	1	N			
48-1	List of counterparties	1	N			
48-1.1	List of counterparties	1	N			
48-2	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-2.1	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-2.2	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-2.3	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-2.4	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-2.5	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-2.6	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-2.7	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-2.8	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-2.9	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-2.10	FPL Derivative Settlements Reports from August 2016 to most recent	1	N	1		
48-2.11	FPL Derivative Settlements Reports from August 2016 to most recent	1	N	7		
48-3	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-3.1	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-3.2	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-3.3	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
48-3.4	FPL Derivative Settlements Reports from August 2016 to most recent	1	N		Subsection	
48-3.5	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-3.6	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-3.7	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-3.8	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-3.9	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-4	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-4.1	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-4.2	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-4.3	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-4.4	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-4.5	FPL Derivative Settlements Reports from August 2016 to most recent FPL	1	N			
48-4.6	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-4.7	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-5	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-5.1	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-5.2	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-5.3	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-5.4	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-5.5	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-5.6	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-5.7	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-5.8	FPL Derivative Settlements Reports from August 2016 to most recent	. 1	N			
48-5.9	FPL Derivative Settlements Reports from August 2016 to most recent	1	N			
48-6	Invoices and Purchased Statements	1	N			
C12172771	Invoices and Purchased Statements	1	N			
11.000.000.000.000	Invoices and Purchased Statements	1	N			
S Francisco III	Invoices and Purchased Statements	1	N			
	Invoices and Purchased Statements	1				
(A)	Deal ticket		N			
	NYMEX Publication	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
48-6.9	NYMEX Publication	1	N		Subsection	
48-6.10	NYMEX Publication	1	N			
48-6.11	Gas Daily Support	1	N			
48-6.12	Confirmation Notices trader verifications	1	N			
48-6.13	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Υ	Col. A, Lns. 1-6	(d), (e)	G. Yupp
48-6.14	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Cols. A-F, except Line 1	(d), (e)	G. Yupp
48-6.15	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Cols. A-H Blocks I-J	(d), (e)	G. Yupp
48-6.16	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	ALL	(d), (e)	G. Yupp
48-6.17	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Cols. A-F	(d), (e)	G. Yupp
48-6.19	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas	1	N			

Workpaper No.	Description	No. of Pages		Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declaran
	Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month				Gubaction	
48-6.20	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-6.21	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-7	Invoices and Purchased Statements	1	N			
48-7.1	Invoices and Purchased Statements	1	N			
48-7.2	Invoices and Purchased Statements	1	N			
48-7.3	Deal ticket	1	N			
48-7.5	NYMEX Publication	1	N			
48-7.6	Gas Daily Support	1	N			
48-7.7	Confirmation Notices trader verifications	1	N			
48-8	Invoices and Purchased Statements	1	N			
48-8.1	Invoices and Purchased Statements	1	N			
48-8.2	Invoices and Purchased Statements	1	N			
48-8.3	Deal ticket	1	N			
48-8.6	NYMEX Publication	1	N			
48-8.7	Gas Daily Support	1	N			
48-8.8	Confirmation Notices trader verifications	1	N			
48-8.9	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Col. A, Lns. 1-7	(d), (e)	G. Yupp
48-8.10	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses	1	Y	Cols. A-C, except Line 1 Cols. D-F, except Line 2	(d), (e)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
	for the specific month				- Calaboouton	
48-8.11	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Cols. A-E	(d), (e)	G. Yupp
48-8.12	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	ALL	(d), (e)	G. Yupp
48-8.13	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-8.14	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month.	1	Y	Cols. A-G	(d), (e)	G. Yupp
48-8.15	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month.	1	N			
48-8.16	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month.	1	N			

Workpaper No.	Description	No. of Pages		Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declaran
48-8.17	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N		Subsection	
48-9	Invoices and Purchased Statements	1	N			
48-9.1	Invoices and Purchased Statements	1	N			
48-9.2	Invoices and Purchased Statements	1	N			
48-9.3	Invoices and Purchased Statements	1	N			
48-9.4	Deal ticket	1	N			
48-9.6	NYMEX Publication	1	N			
48-9.7	Gas Daily Support	1	N			
48-9.8	Confirmation Notices trader verifications	1	N			
48-10	Invoices and Purchased Statements	1	N			
48-10.1	Invoices and Purchased Statements	1	N			
48-10.2	Invoices and Purchased Statements	1	N			
48-10.3	Invoices and Purchased Statements	1	N			
48-10.4	Deal ticket	- 1	N			
48-10.7	NYMEX Publication	1	N			
48-10.8	Gas Daily Support	1	N			
48-10.9	Confirmation Notices trader verifications	1	N			
48-10.10	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Υ	Col. A, Lns. 1-6	(e)	G. Yupp
	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Cols. A-C, except Line 1 Cols. D-F, except Line 2	(d), (e)	G. Yupp
48-10.12	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Cols. A-D Blocks E-F	(d), (e)	G. Yupp
48-10.13	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas	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
	Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month		æ		Guscetton	
48-10.14	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	ALL	(d), (e)	G. Yupp
48-10.15	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-10.16	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Υ	Cols. A-G	(d), (e)	G. Yupp
48-10.17	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-10.18	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-10.19	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-11	Invoices and Purchased Statements	1	N			
48-11.1	Invoices and Purchased Statements	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
48-11.2	Invoices and Purchased Statements	1	N		Subsection	
48-11.3	Deal tickets and Copy of the related Gas Daily Support	1	N			
48-11.5	NYMEX Publication	1	N			
48-11.6	Gas Daily Support	1	N			
48-11.7	Confirmation Notices trader verifications	1	N			
48-12	Invoices and Purchased Statements	1	N			
48-12.1	Invoices and Purchased Statements	1	N			
48-12.2	Invoices and Purchased Statements	1	N			
48-12.3	Deal ticket	1	N			
48-12.6	NYMEX Publication	1	N			
48-12.7	NYMEX Publication	1	N			
48-12.8	Gas Daily Support	1	N			
48-12.9	Confirmation Notices trader verifications	1	N			
48-12.10	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Col. A, Lns. 1-6	(d), (e)	G. Yupp
48-12.11	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Cols. A-C, except Line 1 Cols. D-F	(d), (e)	G. Yupp
48-12.12	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Cols. A-G Block H	(d), (e)	G. Yupp
	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	ALL	(d), (e)	G. Yupp
48-12.14	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses	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	Declaran
	for the specific month.					
48-12.15	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-12.16	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	Y	Cols. A-F	(d), (e)	G. Yupp
48-12.17	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-12.18	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-12.19	Monthly Gas Closing Reports, Natural Gas Sales Summary, Natural Gas Price Computation Worksheets, Natural Gas Consumption and Estimated Cost Reports, Natural Gas Options/Swaps included in the current month. The journal entries recording Gains/Losses for the specific month	1	N			
48-13	Invoices and Purchased Statements	1	N			
48-13.1	Invoices and Purchased Statements	1	N			
48-13.2	Invoices and Purchased Statements	1	N			-
	Invoices and Purchased Statements	1	N			
48-13.4	Deal ticket	1	N			
48-13.6	NYMEX Publication	1	N			
	NYMEX Publication	1	N			
	Gas Daily Support	1	N			
	Confirmation Notices trader verifications	1	N			
	List of transaction fees and brokerage fees	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
48-14.1	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies.	1	Y	Cols. A-F	(d)	G. Yupp
48-14.2	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies.	1	Y	Cols. A-F	(d)	G. Yupp
48-14.3	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies.	1	Υ	Cols. A-F	(d)	G. Yupp
48-14.4	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies.	1	Υ	Cols. A-F	(d)	G. Yupp
48-14.5	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies.	1	Y	Cols. A-F	(d)	G. Yupp
48-14.6	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies.	1	Y	Cols. A-E	(d)	G. Yupp
48-14.7	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies.	1	Y	Cols. A-E	(d)	G. Yupp
48-14.8	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies.	1	Y	Cols. A-E	(d)	G. Yupp
48-14.9	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies.	1	Y	Cols. A-E	(d)	G. Yupp
48-14.10	List of all physical hedging transactions, Treatment of transaction costs and brokerage fees, Tolling Agreements, and hedging transactions with affiliate companies.	1	Y	Cols. A-E	(d)	G. Yupp
	Derivative Settlement Reports, Brokerage Fees, and PPS support for June and July	1	Y	Cols. A-E	(d)	G. Yupp
48-14.12	Derivative Settlement Reports, Brokerage Fees, and PPS support for June and	1	Y	Cols. A-E	(d)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
	July					
48-14.13	Derivative Settlement Reports, Brokerage Fees, and PPS support for June and July	1	Υ	Line 1A Col. B	(d)	G. Yupp
48-14.14	Derivative Settlement Reports, Brokerage Fees, and PPS support for June and July	1	Υ	Line 1A Col. B	(d)	G. Yupp
48-14.15	Derivative Settlement Reports, Brokerage Fees, and PPS support for June and July	1	Y	Line 1A Col. B	(d)	G. Yupp
48-15	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.1	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.2	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.3	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.4	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.5	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.6	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.7	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.8	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			te
48-15.9	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.10	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.11	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.12	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.13	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.14	Planned Position Strategy (PPS) reports, including applicable	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
2000 - 11110 - 11110	revisions				Gubocotion	
48-15.15	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.16	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.17	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.18	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.19	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.20	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.21	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.22	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.23	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.24	Planned Position Strategy (PPS) reports, including applicable revisions Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.25	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.26	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.27	Derivative Settlement Reports, Brokerage Fees, and PPS support for June	1	N			
48-15.28	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
	Planned Position Strategy (PPS) reports, including applicable revisions	1	N		22.3	N. 7
	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			

Workpaper No.	Description	No. of Pages	- C-500/2-0	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
48-15.33	Planned Position Strategy (PPS) reports, including applicable revisions	1	N		Subsection	
48-15.34	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.35	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.36	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.37	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.38	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-15.39	Planned Position Strategy (PPS) reports, including applicable revisions	1	N			
48-16.1	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
48-16.2	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	-1	N			
48-16.3	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
48-16.4	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading- Trading and Risk Management Procedures Manual and NextEra- Energy Trading and Risk Management Policy	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
48-16.6	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading- Trading and Risk Management Procedures Manual and NextEra- Energy Trading and Risk Management Policy	1	N		Subsection	
48-16.7	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
48-16.8	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
48-16.9	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
48-16.10	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
48-16.11	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
48-16.12	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
48-16.13	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading- Trading and Risk Management Procedures Manual and NextEra- Energy Trading and Risk Management	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
	Policy				Oubsection	
48-16.14	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading- Trading and Risk Management Procedures Manual and NextEra- Energy Trading and Risk Management Policy	1	N			
48-16.15	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
48-16.16	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	N			
48-16.17	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	Υ	ALL	(e)	G. Yupp
48-16.18	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	Υ	ALL	(e)	G. Yupp
48-16.19	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	Y	ALL	(e)	G. Yupp
48-16.20	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	Y	ALL	(e)	G. Yupp
48-16.21	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk	1	Υ	ALL	(e)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No. / Line No.	Florida Statute 366.093 (3) Subsection	Declarant
	Management Policy					
48-16.22	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	Υ	ALL	(e)	G. Yupp
48-16.23	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	Y	ALL	(e)	G. Yupp
48-16.24	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	Y	ALL	(e)	G. Yupp
48-16.25	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	Υ	ALL	(e)	G. Yupp
48-16.26	Unredacted copy of the Risk Management Plan for Fuel Procurement. FPL's Energy Marketing and Trading-Trading and Risk Management Procedures Manual and NextEra-Energy Trading and Risk Management Policy	1	Y	ALL	(e)	G. Yupp
48-17.1	Sarbanes Oxley 404 Compliance - Process Narrative	1	Y	Lns. 1-10	(e)	G. Yupp

EXHIBIT D

DECLARATION

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery Clause with Generating Performance Incentive Factor Docket No: 20190001-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 Division. I have personal knowledge of the matters stated in this written declaration.
- 2. I have reviewed Exhibit C and the documents that are included in Exhibit A to FPL's First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 17-048-4-1 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 pertinent to FPL's procurement activities and optimization program. Specifically, the documents contain or constitute proprietary FPL strategies, which allow FPL to optimize its fuel purchases on favorable terms for FPL and its customers. The disclosure of this information would provide other market participants insight into FPL's marketing and trading practices, as well as internal policy and procedure that would allow them, to anticipate FPL's marketing and trading decisions, and/or impair FPL's ability to negotiate, to the detriment of FPL and its customers.
- 3. Nothing has occurred since the issuance of Order No. PSC-2017-0425-CFO-EG to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information 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.

GERARO J. YUPP

Date: 5/3/19