



Maria Jose Moncada
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5795
(561) 691-7135 (Facsimile)
E-mail: maria.moncada@fpl.com

July 27, 2021

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

Re: Docket No. 20210001-EI

REDACTED

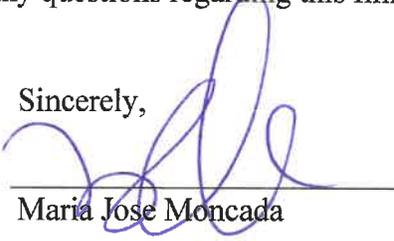
Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Certain Information included in FPL's 2022 Risk Management Plan, which is Exhibit GJY-2 to FPL's 2021 actual/estimated true-up petition in Docket 20210001-EI. 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 and Exhibit D are a justification table and declaration in support of FPL's Request.

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

Sincerely,



Maria Jose Moncada

2021 JUL 27 PM 3:59
RECEIVED-FPSC
COMMISSION
CLERK

- COM _____
- AFD 1 Exh B
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

Enclosure

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20210001-EI

Date: July 27, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION ON FPL'S 2022
RISK MANAGEMENT PLAN (GJY-2)**

Pursuant to Section 366.093, Florida Statutes and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain information (the "Confidential Information") contained in FPL's 2022 Risk Management Plan ("Hedging Plan"), which is Exhibit GJY-2 to the 2021 actual/estimated true-up petition that is being filed in this docket on July 27, 2021. In support of its Request, FPL states as follows:

1. FPL is filing its 2022 Hedging Plan as Exhibit GJY-2 to the 2021 actual/estimated true-up petition contemporaneously with this request. Portions of the Hedging Plan contain confidential information.
2. The following exhibits are included with and made a part of this request:
 - a. Exhibit A is a copy of the Hedging Plan in which all of the Confidential Information has been highlighted.
 - b. Exhibit B consists of two copies of the Hedging Plan in which all the Confidential Information has been redacted. Where entire pages are confidential, FPL includes only identifying cover pages in Exhibit B.
 - c. Exhibit C is a table that identifies by column and line the information for which confidential treatment is sought and references the specific statutory bases for the claim of confidentiality and the declarant who supports the requested classification.
 - d. Exhibit D is the declaration of Gerard J. Yupp in support of this request.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determined that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. As described more fully in the declaration included as Exhibit D, the Hedging Plan includes details of FPL's strategy and plans for hedging fuel purchases in 2022 and beyond. Certain Confidential Information contained in the Hedging Plan relates to hedging-related bids or other contractual data, the disclosure of which would impair the efforts of FPL to hedge on favorable terms, to the detriment of FPL and its customers. This information is protected by Section 366.093(3)(d), Fla. Stat.

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

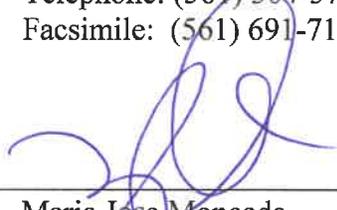
6. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

Maria Jose Moncada
Senior Attorney
maria.moncada@fpl.com
Florida Bar No. 0773301
David M. Lee
Senior Attorney
david.lee@fpl.com
Florida Bar No. 103152
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135

By: _____


Maria Jose Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE

Docket No. 20210001-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 27th day of July 2021 to the following:

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

Russell A. Badders
Vice President & Associate General Counsel
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100
russell.badders@nexteraenergy.com

Dianne M. Triplett
299 First Avenue North
St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com

Matthew R. Bernier
Robert L. Pickels
Duke Energy Florida
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
robert.pickels@duke-energy.com
matthew.bernier@duke-energy.com
FLRegulatoryLegal@duke-energy.com
Attorneys for Duke Energy Florida

Beth Keating
Gunster Law Firm
215 South Monroe St., Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com
**Attorneys for Florida Public Utilities
Company**

Richard Gentry
Patricia A. Christensen
Charles J. Rehwinkel
Stephanie Morse
Anastacia Pirrello
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
gentry.richard@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
morse.stephanie@leg.state.fl.us
pirrello.anastacia@leg.state.fl.us

James D. Beasley
J. Jeffrey Wahlen
Malcolm N. Means
Ausley & McMullen
P.O. Box 391
Tallahassee, Florida 32302
jbeasley@ausley.com
jwahlen@ausley.com
mmeans@ausley.com
Attorneys for Tampa Electric Company

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

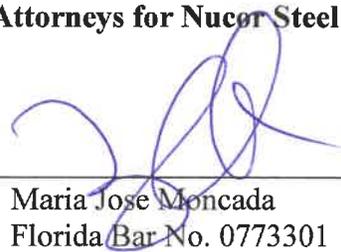
Mike Cassel
Director/Regulatory and
Governmental Affairs
Florida Public Utilities Company
208 Wildlight Ave.
Yulee, Florida 32097
mcassel@fpuc.com

James W. Brew
Laura Wynn Baker
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007
jbrew@smxblaw.com
lwb@smxblaw.com
**Attorneys for PCS Phosphate – White
Springs**

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
mqualls@moylelaw.com
**Attorneys for Florida Industrial Power
Group**

Peter J. Mattheis
Michael K. Lavanga
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Suite 800 West
Washington, DC 20007-5201
pjm@smxblaw.com
mkl@smxblaw.com
Attorneys for Nucor Steel Florida, Inc.

By: _____


Maria Jose Moncada
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.

20210001-EI

FPL's Request for Confidential Classification

EXHIBIT "B"

offering similar pricing, the traders will attempt to execute trades with the counterparty that has the least amount of credit exposure with FPL. This is done primarily to allow FPL to spread its risk among as many counterparties as possible, but also affords the advantage of preventing the inadvertent telegraphing of FPL's commercial intentions to the market, thus helping to ensure favorable pricing for FPL's hedges.

2022 Hedging Strategy (TFB-4, Items 2 and 8)

FPL plans to hedge a portion of its projected 2023 natural gas requirements during 2022. Absent special circumstances (e.g. a hurricane that FPL concludes will substantially impair market functions); FPL will implement its hedging program within the following parameters:

- 1) FPL will hedge approximately [redacted]^A of its projected 2023 natural gas requirements from [redacted] through [redacted]^B ("the Hedging Window") using financial swaps, and/or physical fixed price transactions. FPL will hedge approximately [redacted]^A of each individual month's projected natural gas requirements. FPL will not financially hedge its projected natural gas requirements beyond the end of calendar year 2023.
- 2) During each month of the Hedging Window, FPL will hedge between [redacted]^A and [redacted]^A of the target monthly volumes. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.
- 3) FPL intends to rebalance its natural gas hedge positions during the year based on changes in forecasted market prices, projected unit outage schedules or changes in FPL's load forecast. Once the initial monthly target volumes have been hedged, rebalancing will be executed to maintain the hedge percentages inside approved tolerance bands. FPL will maintain an overall hedge percentage that falls within a [redacted]^A tolerance band. Therefore, the minimum and maximum monthly hedge percentages are [redacted]^A and [redacted]^B respectively.
- 4) FPL does not intend to hedge fuel oil for 2023.

Reporting System for Fuel Procurement Activities (TFB-4, Items 13 and 14)

FPL reporting systems comprehensively identify, measure, and monitor all forms of risk associated with fuel procurement activities.

FPL's philosophy on reporting is that it should be timely, consistent, flexible, and transparent. Timely and consistent reporting of risk information is critical to the effective management of risk. The utility has sufficient systems capability for identifying, measuring, and monitoring all types of risk associated with fuel procurement activities. These systems include: deal capture, current and historical

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 61]

EMT Trading and Risk Management Procedures as of July 21, 2021

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 26]

NEE Trading and Risk Management Policy

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Exhibits
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
DOCKET NO: 20210001-EI
DATE: July 27, 2021

Description	Page Nos.	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
GJY-2 (FPL's 2022 Risk Management Plan)	5 of 7	Lines 1A, 2A, 2B, 3A, 4A, 5A, 6A, 7A, 7B	(d), (e)	G. Yupp
GJY-2 (EMT Trading and Risk Management Procedures as of July 21, 2021)	2 through 61	ALL	(d), (e)	G. Yupp
GJY-2 (NEE Trading and Risk Management Policy)	2 through 26	ALL	(d), (e)	G. Yupp

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20210001-EI

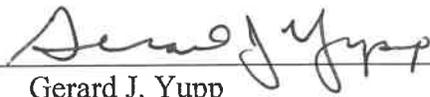
DECLARATION OF GERARD J. YUPP

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 of its 2022 Risk Management Plan. 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 hedging program. Specifically, the documents contain or constitute proprietary FPL strategies, which allow FPL to hedge 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. 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 least eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

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


Gerard J. Yupp

Date: 7/23/21