

claim of confidentiality notice of intent request for confidentiality filed by OPC

For DN <u>02360-11</u>, which is in locked storage. You must be authorized to view this DN.-CLK Scott A. Goorland Principal Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 561-304-5633 (561) 691-7135 (Facsimile) E-mail: scott.goorland@fpl.com

April 8, 2011

-VIA HAND DELIVERY -

Ms. Ann Cole, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 110001-EI

Dear Ms. Cole:

I am enclosing for filing in the above docket the original and seven (7) copies of Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Certain Information Responsive to Staff's First Set of Interrogatories Nos.1-3. The original includes Exhibit A through D.

Exhibit A contains the confidential information that is the subject of FPL's Request for Confidential Classification. Exhibit A is submitted for filing separately and marked **"EXHIBIT A"- CONFIDENTIAL.** Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C contains FPL's Justification table for its Request for Confidential Classification. Exhibit D contains the affidavit of G. Yupp in support of FPL's Request for Confidential Classification. In accordance with Rule 25.22.006(3)(d), FPL requests confidential treatment of information in EXHIBIT A pending disposition of FPL's Request for Confidential Classification.

Also included herewith is a computer CD containing FPL's Request for Confidential <u>Classification and Exhibit C. The operating system is windows XP</u>, and the processing software APA <u>Lis word</u>.

ECR 3 + CDPlease contact me if you or your Staff has any questions regarding this filing GCL RAD Sincerely. SSC ADM OPC Scott A. Goorland CLK CLK Enclosure

cc: Counsel for Parties of Record (w/encl.)

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an FPL Group company

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Fuel and purchased power cost recovery clause with generating performance incentive factor. Docket No. 110001-EI

Filed: April 08, 2011

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES

Florida Power & Light Company ("FPL"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, requests confidential classification of certain information provided in response to Staff's First Set of Interrogatories Nos. 1-3, (the "Confidential Discovery Responses") which was served by Staff on March 11, 2011. In support of its Request, FPL states as follows:

1. FPL served its responses to Staff's First Set of Interrogatories on April 08, 2011, for overnight delivery to Staff on April 11, 2011. This request is being filed contemporaneously with the service of the responses to Staff, in order to request confidential classification of the Confidential Discovery Responses, consistent with Rule 25-22.006, Florida Administrative Code

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

a. Exhibit A consists of a copy of the Confidential Discovery Response on which all information that FPL asserts is entitled to confidential treatment has been highlighted.

b. Exhibit B consists of an edited version of Exhibit A on which all information that FPL asserts is entitled to confidential treatment has been redacted.

0000MENT NUMBER-DATE 02359 APR-8 = FPSC-COMMISSION CLERK c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A, together with references to the specific statutory bases for the claim of confidentiality and to the affidavit in support of the requested classification.

d. Exhibit D consists of the affidavit of Gerard J. Yupp, Senior Director,
Wholesale Operation in the Energy Marketing and Trading Division Department.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), F.S. This information in Exhibit A is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, F.S., 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 hard of disclosure against the public interest in access to the information.

4. As the affidavit included in Exhibit D indicates, the information provided by FPL contains trade secrets, This information is protected under Section 366.093(3)(a), F.S. Specifically, the documents contain information regarding FPL's monthly hedging results for natural gas and heavy fuel oil. The disclosure of this information would provide other participants in the fuel and financial markets insight into FPL's hedging practices that would allow them to anticipate FPL's trading decisions and/or impair FPL's ability to negotiate, to the detriment of FPL and its customers. In addition, the public disclosure of this information would place FPL at a competitive disadvantage when coupled with other information that is publicly available. This information is protected under Section 366.093(3)(e), F.S.

5. Upon a finding by the Commission that the Fuel Hedging Confidential Information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), F.S., pursuant to Section 366.093(4), F.S., such materials should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business.

WHEREFORE, FPL respectfully requests confidential classification of the Fuel Hedging Confidential Information described herein.

Respectfully submitted this 8th day of April, 2011.

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

BY:

Scott A. Goorland Fla. Bar No. 0066834

CERTIFICATE OF SERVICE Docket No. 110001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by overnight delivery(*) or United States mail on April 8, 2011, to the following:

Jennifer Crawford, Esq.* Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd Tallahassee, Florida 32399-0850 jcrawford@PSC.STATE.FL.US	J. R. Kelly, Esq. Patricia Christensen, Esq. Charles Rehwinkel, Esq. Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, Florida 32399 <u>Kelly.jr@leg.state.fl.us</u> Christensen.patty@leg.state.fl.us
	rehwinkle.charles@leg.state.fl.us
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John W. McWhirter, Jr., Esq McWhirter & Davidson, P.A. Attorneys for FIPUG P.O. Box 3350 Tampa, Florida 33602 jmcwhirter@mac-law.com	Beth Keating, Esq. Gunster Firm Attorneys for FPUC 215 So. Monroe St., Suite 618 Tallahassee, Florida 32301-1804 <u>bkeating@gunster.com</u>
Jeffrey A. Stone, Esq. Russell A. Badders, Esq. Beggs & Lane Attorneys for Gulf Power 501 Commendencia Street Pensacola, FL 32502 jas@beggslane.com rab@beggslane.com	James W. Brew, Esq / F. Alvin Taylor, Esq. Attorney for White Springs Brickfield, Burchette,Ritts & Stone, P.C 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 2007-5201 jbrew@bbrslaw.com ataylor@bbrslaw.com

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Attorney for the Federal Executive Agencies	
Allan.Jungels@tyndall.af.mil	

BY: Scott A. Goorland

Scott A. Goorland Fla. Bar No. 0066834

EXHIBIT "A"

CONFIDENTIAL FILED UNDER SEPARATE COVER

EXHIBIT "B"

EDITED VERSION

FPSC-COMMISSION CLERK

DOCUMENT NUMBER-DATE 02359 APR-8 =

Fiorida Power Light Company Docket No. 110001-EI Staff's 1st Set of Interrogatories Interrogatory No. 1 Attachment I Page 1 of 2

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		NATURAL GAS UNHEDGED COSTS	NATURAL GAS HEDGING RESULTS	NATURAL GAS TOTAL HEDGED COSTS	NATURAL GAS MMBTUS (A3) (A3)	COST/MMBTU (\$) W/O Hedging (B)/(E)	COST/MMBTU (\$ W/ Hedging (D)/(E)
	January-2003		(Hedging Results Filings)	(A3) \$131,873,594	22,466,273	(B)/(E)	\$5.87
	February-2003			\$113,277,581	17,500,036		\$8.47
	March-2003			\$231,638,631	27,273,324 23,729,736		\$8.50 \$6.03
	April-2003 May-2003			\$143,109,382 \$183,899,905	30,883,052		\$5.95
	June-2003			\$184,875,040	27,815,409		\$6.65
	July-2003			\$181,981,279	29,480,896		\$6.17
	August-2003			\$151,374,626	26,455,545		\$5.72
	September-2003			\$155,161,257 \$153,477,290	25,983,301 26,473,807		\$5.97 \$5.80
	October-2003 November-2003			\$140,688,437	24,558,470		\$5.73
	December-2003			\$133,560,114	22,818,381		\$5.85
	January-2004			\$132,108,889	20,941,663		\$8.31
	February-2004			\$124,805,128	20,488,087		\$6.09 \$6.08
	March-2004			\$144,508,109 \$152,566,395	23,758,934 24,956,312		\$6.05 \$6.11
	April-2004 May-2004			\$184,854,128	28,534,679		\$6.48
	June-2004			\$198,138,805	30,897,461		\$6.41
	July-2004			\$203,845,291	31,971,459		\$6.38
	August-2004			\$196,751,817	31,047,572		\$8.34
	September-2004			\$204,391,643 \$204,862,666	32,497,895 31,158,417		\$6.29 \$6.57
	October-2004 November-2004			\$146,867,288	22,575,830		\$6.51
	Dacember-2004			\$159,768,876	23,548,872		\$6.78
	January-2005			\$201,970,652	27,483,009		\$7.36
	February-2005			\$160,076,509	21,398,154		\$7.48
	March-2005			\$189,582,578 \$191,201,327	25,070,037 24,686,007		\$7.58 \$7.75
	April-2005 May-2005			\$220,629,867	29,630,026		\$7.45
	June-2005			\$238,270,617	31,897,078		\$7.47
	July-2005			\$363,356,037	45,763,848		\$7.94
	August-2005			\$352,263,268	39,920,150		\$6,82
	Saptember-2005			\$388,007,932 \$346,717,629	33,354,896 32,619,479		\$11.63 \$10.63
	October-2005 November-2005			\$269,933,253	29,779,416		\$9.06
	December-2005			\$182,649,214	22,259,386		\$8.21
	January-2008			\$248,911,298	28,259,023		\$8.81
	February-2006			\$250,388,980	28,158,113		\$8.89
	March-2008			\$320,043,008 \$341,492,838	35,932,370 38,062,590		\$8.91 \$8.97
	April-2006 May-2006			\$398,685,398	45,744,980		\$8.71
	June-2006			\$390,240,917	45,377,426		\$8.60
	July-2008			\$398,022,710	45,711,628		\$8.71
	August-2006			\$372,157,014	40,974,551		\$9.08
	September-2006			\$373,441,738 \$341,841,345	44,872,538 39,551,631		\$8.32 \$8.64
	October-2006 November-2006			\$277,949,160	29,660,439		\$9.37
	December-2006			\$275,381,879	30,644,655		\$8.99
	January-2007			\$295,689,286	29,675,912		\$9.96
	February-2007			\$258,937,095	25,310,829		\$10.23
	March-2007			\$282,172,647 \$343,974,097	28,660,444 33,791,083		\$9.85 \$10.18
	April-2007 May-2007			\$400,189,582	40,128,768		\$9.97
	June-2007			\$414,704,972	42,090,849		\$9.85
	July-2007			\$445,239,073	47,289,200		\$9.42
	August-2007			\$458,642,843	47,719,192		\$9.57
	September-2007 October-2007			\$442,806,515 \$440,195,823	47,755,354 47,376,649		\$9.27 \$9.29
	November-2007			\$340,502,672	34,559,547		\$9.85
	December-2007			\$352,168,107	36,508,503		\$9,65
	January-2008			\$303,046,588	32,287,423		\$9.39
	Fabruary-2008			\$308,188,667	31,886,896		\$9.67
	March-2008 April-2008			\$344,950,595 \$384,166,506	34,784,589 38,103,754		\$9.92 \$10.08
	April-2008 May-2008			\$476,978,063	43,654,776		\$10.93
	Juna-2008			\$512,803,656	44,626,093		\$11.49
	July-2008			\$543,244,190	48,397,507		\$11.71
	August-2008			\$488,285,341	48,749,735		\$10.02
	September-2008 October-2008			\$458,478,100 \$375,518,895	42,506,399 41,284,141		\$10.79 \$9.10
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Fiorida Power Light Company Docket No. 110001-Ei Staffs 1st Sei of Interrogatories Interrogatory No. 1 Attachment i Page 2 of 2

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	(A)	(8)	(C)	(D)	(E)	(F)	(G)			
	NATURAL GAS BURN COST VARIANCE AND HEDGING EFFECTIVENESS									
		NATURAL GAS UNHEDGED COSTS	NATURAL GAS HEDGING RESULTS (Hedging Results fillings)	NATURAL GAS TOTAL HEDGED COSTS (A3)	NATURAL GAS MMBTUS (A3) (A3)	COST/MMBTU (\$) W/O Hedging (B)/(E)	COST/MMBTU (\$) W/ Hedging (D) / (E)			
72	December-2008			\$262,969,625	27.444.316	<del>تەنىنى بەركە بىلەردا بەركە</del>	\$9.58			
73	January-2009			\$298,137,410	30,134,060		\$9.89			
74	February-2009			\$256,532,020	28,250,885		\$9.08			
75	March-2009			\$296,363,834	34,612,821		\$8.56			
76	April-2009			\$326,018,200	39,943,759		\$8,16			
77	May-2009			\$359,853,642	45,531,032		\$7.90			
78	June-2009			\$368,945,306	46,471,180		\$7.94			
79	July-2009			\$381,974,109	49,415,203		\$7.73			
80	August-2009			\$387,281,276	51,823,779		\$7.50			
81	September-2009			\$373,017,591	49,094,433		\$7.60			
82	October-2009			\$362,921,906	45,012,462		\$8,06			
83	November-2009			\$320,661,379	39,262,259		\$8.16			
84	December-2009			\$299,160,910	32,937,591		\$9.08			
85	January-2010			\$281,291,953	36,346,024		\$7.19			
86	February-2010			\$229,836,651	33,487,589		\$6.86			
87	March-2010			\$223,687,057	34,498,578		\$6.48			
88	April-2010			\$232,003,950	37,167,833		\$6.24			
89	May-2010			\$293,558,193	48,535,150		\$6.05			
90	June-2010			\$310,268,578	50,030,113		\$8.20			
91	July-2010			\$324,306,768	50,282,535		\$6.45			
92	August-2010			\$329,772,607	51,206,941		\$6.44			
93	September-2010			\$298,490,788	50,469,972		\$5.91			
94	October-2010			\$281,871,205	46,601,732		\$6.05			
95	November-2010			\$226,120,988	38,380,856		\$6.22			
96	December-2010			\$253,930,768	38,735,315		\$6.58			
97	TOTAL	\$24,974,171,314	-\$2,593,438,425	\$27,587,609,739	3,374,873,573					
98										
99				WEIGI	ITED AVERAGE PRICE		\$8.17			
100					VARIANCE		2.64			
101				\$	STANDARD DEVIATION	ŧ.	1.62			

Florida Power Light Company Docket No. 110001-El Staffs 1st Set of Interrogatories Interrogatory No. 2 Attachment I Page 1 of 2

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	(A)	(B)	(C)	(D)	(E)	(F)	(G)
		······································	HEAVY FUEL OIL BURN CO	ST VARIANCE AND HEDG	ING EFFECTIVENESS	······································	·····
		HEAVY FUEL OIL UNHEDGED COSTS	HEAVY FUEL OIL HEDGING RESULTS (Hedging Results Filings)	HEAVY FUEL OIL TOTAL HEDGED COSTS (A3)	HEAVY FUEL OIL MMBTUS (A3) (A3)	COST/MMBTU (\$) W/O Hedging ( 8 ) / ( E )	COST/MMBTU (\$) W/ Hedging ( D ) / ( E )
<b>, ட</b>	January-2003		Triadding reserves sumdat	\$52,553,585	12,880,317		\$4.08
2	February-2003			\$38,389,105	8,788,097		\$4.37
3	March-2003			\$88,014,626	18,819,286		\$4.68
4	April-2003			\$64,578,039	13,793,537		\$4.68 \$4.50
5 6	May-2003 June-2003			\$86,806,957 \$97,312,227	19,304,324 21,987,820		\$4,43
7	July-2003			\$102,780,897	22,441,977		\$4.58
8	August-2003			\$101,759,084	22,673,601		\$4,49
9	September-2003			\$102,053,499	23,198,505		\$4.40 \$4,38
10	October-2003 November-2003			\$96,166,348 \$49,271,618	21,949,497 11,221,827		\$4.39
11 12	December-2003			\$34,735,800	7,982,446		\$4.35
13	January-2004			\$34,875,582	8,124,216		\$4.28
14	February-2004			\$35,542,181	8,312,259		\$4.28
15	March-2004			\$61,248,735	14,758,215		\$4,15 \$4,18
16 17	April-2004 May-2004			\$64,904,999 \$72,607,237	15,538,319 16,791,775		\$4.32
18	June-2004			\$112,493,566	25,188,876		\$4.47
19	July-2004			\$108,763,739	23,881,531		\$4.55
20	August-2004			\$105,244,100	22,782,315		\$4.62
21	September-2004			\$84,771,296 \$80,986,881	19,316,749 17,651,818		\$4.39 \$4.59
22 23	October-2004 November-2004			\$69,205,977	15,281,820		\$4.53
24	December-2004			\$50,345,494	11,282,351		\$4.46
25	January-2005			\$50,164,648	10,760,846		\$4.68
26	February-2005			\$40,520,227	8,470,057		\$4.78 \$4.89
27	March-2005			\$57,313,017 \$68,932,392	11,716,124 13,450,104		\$4.98
28 29	April-2005 May-2005			\$84,429,821	15,924,617		\$5.30
30	June-2005			\$105,719,477	18,266,668		\$5.79
31	July-2005			\$134,887,962	22,739,129		\$5.93
32	August-2005			\$144,582,253	22,431,162 24,966,746		\$6.45 \$6.95
33 34	September-2005 October-2005			\$173,455,809 \$120,924,072	15,997,771		\$7.56
35	November-2005			\$87,483,470	11,730,437		\$7.46
36	December-2005			\$123,120,982	16,516,488		\$7.45
37	January-2006			\$48,250,688	6,044,801 3,252,034		\$7.98 \$8.21
38 39	February-2008 March-2008			\$26,687,523 \$27,190,246	3,251,833		\$8,36
40	April-2006			\$71,635,711	8,733,935		\$8.20
41	May-2006			\$56,292,729	6,959,202		\$8.09
42	June-2008			\$88,666,194	10,860,490		\$8.16 \$8.15
43 44	July-2008 August-2005			\$77,047,810 \$163,628,932	9,459,239 20,308,865		\$8.06
45	September-2008			\$71,594,567	8,734,502		\$8.20
46	October-2008	÷		\$65,959,960	7,989,731		\$8.28
47	November-2008			\$65,093,840	7,952,557		\$8.19
48 49	December-2008 January-2007			\$30,877,718 \$27,615,708	3,696,720 3,189,141		\$8.35 \$8.66
49 50	February-2007			\$56,112,150	6,991,306		\$9.37
51	March-2007	,		\$32,953,022	3,316,398		\$9.94
52	April-2007			\$96,003,753	10,176,207		\$9.43
53 54	May-2007 June-2007			\$95,983,767 \$92,457,198	10,310,899 10,334,096		\$9.31 \$8.95
54 55	June-2007 July-2007			\$111,903,460	12,375,314		\$9.04
56	August-2007			\$162,247,733	17,486,591		\$9.28
57	September-2007			\$113,809,030	11,980,762		\$9.50 \$9.42
58 59	October-2007 November-2007			\$103,516,890 \$21,764,459	10,992,854 2,168,558		\$9.42 \$10.04
59 80	December-2007			\$9,731,678	981,751		\$9.91
61	January-2006			\$16,993,995	1,784,887		\$9.63
62	February-2008			\$22,902,013	2,390,622		\$9.58
63 64	March-2008 April-2008			\$31,759,248 \$71,514,487	3,285,880 6,840,564		\$9.67 \$10.45
65	May-2008			\$68,056,247	6,660,685		\$10.22
66	June-2006			\$103,668,024	9,253,504		\$11.20
67	July-2008			\$67,037,632	6,220,892		\$10.78
68 69	August-2008 September-2008			\$79,190,475 \$104,269,550	7,869,199 10,339,458		\$10.06 \$10.08
09 70	October-2008			\$37,470,351	3,834,079		\$9.77
10	000000-2000						-

Florida Power Light Company Docket No. 110001-El Slaff's 1st Set of Interrogatory No. 2 Attachment f Page 2 of 2

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	(A)	(8)	(0)	(D)	(E)	(F)	(G)
	····	······	HEAVY FUEL OIL BURN CO	ST VARIANCE AND HEDO	SING EFFECTIVENESS		
		HEAVY FUEL OIL UNHEDGED COSTS	HEAVY FUEL OIL HEDGING RESULTS (Hedging Results Filings)	HEAVY FUEL OIL TOTAL HEDGED COSTS (A3)	HEAVY FUEL OIL MMBTUS (A3) (A3)	COST/IMMBTU (\$) W/O Hedging ( 8 ) / ( E )	COST/MMBTU (\$) W/ Hedging ( D ) / ( E )
71	November-2008			\$13,324,853	1,349,235		\$9.88
72	December-2008			\$3,874,213	401,619		\$9.65
73	January-2009			\$10,745,280	1,098,175		\$9.78
74	February-2009			\$20,593,082	2,100,100		\$9.81
75	March-2009			\$12,026,891	1,209,183		\$9,95
76	April-2009			\$35,908,174	3,722,137		\$9.65
77	May-2009			\$60,218,345	6,090,942		\$9.89
78	June-2009			\$68,408,944	8,789,943		\$10.08
79	July-2009			\$72,181,801	6,796,592		\$10.62
80	August-2009			\$83,114,982	7,498,736		\$11.08
81	September-2009			\$62,084,320	5,351,404		\$11.60
82	October-2009			\$67,095,813	5,763,851		\$11.64
83	November-2009			\$15,543,494	1,316,730		\$11.80
84	December-2009			\$3,118,214	268,056		\$11.63
85	January-2010			\$70,756,696	6,063,039		\$11.63
88	February-2010			\$882,687	76,401		\$11.55
87	March-2010			\$18,082,910	1,550,013		\$11.67
88	April-2010			\$20,117,132	1,762,075		\$11.42
89	May-2010			\$52,282,217	4,539,537		\$11.51
90	June-2010			\$97,641,711	8,574,437		\$11.39
91	July-2010			\$76,601,139	6,792,779		\$11.28
92	August-2010			\$78,582,012	6,793,746		\$11.57
93	September-2010			\$31,468,112	2,715,393		\$11.59
94	October-2010			\$10,348,355	905,494		\$11.43
95	November-2010			\$665,462	57,831		\$11.51
96	December-2010			\$35,498,406	3,063,811		\$11.59
97	TOTAL	\$6,616,300,922	\$290,329,310	\$8,325,971,612	944,599,942		
98					ITED AVERAGE PRICE		\$6.70
99				WEIGH	VARIANCE		7.24
100 101				S	TANDARD DEVIATION		2.69

Florida Power Light Company Docket No. 110001-El Staffs 1st Set of Interrogatories Interrogatory No. 3 Attachment I Page 1 of 2

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	(A)	(B)	(C)	(D)	(£)	(F)	(G)
E		······	TOTAL FUEL COST VARIA	NCE AND HEDGING EFF	ECTIVENESS		
Γ		TOTAL	TOTAL	TOTAL	TOTAL		
		UNHEDGED FUEL COSTS	HEDGING RESULTS		HEDGED FUEL MMBTU	COST/MMBTU (\$)	COST/MMBTU (\$)
		(NG & HO)	(NG & HO)	(NG & HO)	(NG & HO)	W/O Hedging	W/ Hedging
_	January-2003		(Hedging Results Filings)	(A3) \$184,427,159	(A3) 36,346,590	(B)/(É)	(D)/(E) \$5.22
2	February-2003			\$151,666,686	26,288,133		\$5.77
3	March-2003			\$319,853,257	46,092,610		\$6.94
4 5	April-2003 May-2003			\$207,687,421 \$270,706,882	37,523,273 50,187,376		\$5.53 \$5.39
5	June-2003			\$282,187,267	49,803,029		\$5.67
7	July-2003			\$284,742,176	51,922,873		\$5.48
8 9	August-2003 September-2003			\$253,133,710 \$257,214,756	49,129,14 <del>8</del> 49,181,806		\$5.15 \$5.23
10	October-2003			\$249,643,638	48,423,304		\$5,16
11	Novembar-2003			\$189,960,055	35,778,297		\$5.31
12 13	December-2003 January-2004			\$168,295,914 \$168,984,471	30,800,827 29,065,879		\$5.46 \$5.75
14	February-2004			\$160,347,309	28,800,346		\$5.57
15	March-2004			\$205,758,844	38,517,149		\$5.34
16 17	April-2004 May-2004			\$217,471,394 \$257,461,385	40,494,631 45,326,454		\$5.37 \$5.68
18	June-2004			\$310,632,371	56,086,337		\$5.54
19	July-2004			\$312,609,030	55,852,990		\$5.60
20 21	August-2004 September-2004			\$301,995,917 \$289,162,939	53,829,887 51,814,644		\$5.81 \$5.58
21	Ociober-2004			\$285,849,547	48,810,235		\$5.86
23	November-2004			\$216,073,285	37,857,650		\$5.71
24	December-2004			\$210,114,370 \$252,135,300	34,831,223 38,243,8 <b>65</b>		\$6.03 \$6.59
25 26	January-2005 February-2005			\$200,596,736	29,868,211		\$6,72
27	March-2005			\$246,895,593	36,786,161		\$6.71
28	April-2005			\$258,133,719	38,136,111		\$6.77 \$6.70
29 30	May-2005 June-2005			\$305,059,688 \$343,890,094	45,554,643 50,163,746		\$6.86
31	July-2005			\$498,243,999	68,502,977		\$7.27
32	August-2005			\$496,845,521	62,351,312		\$7.97
33 34	September-2005 October-2005			\$561,463,741 \$467,641,701	58,321,642 48,617,250		\$9.63 \$9.62
35	November-2005			\$357,416,723	41,509,853		\$8.61
36	December-2005			\$305,770,196	38,775,874		\$7.89
37 38	January-2008 February-2006			\$297,161,984 \$277,076,503	34,303,824 31,410,147		\$8.66 \$8.82
39	March-2006			\$347,233,254	39,184,203		\$8.86
40	April-2008			\$413,128,549	46,798,525		\$8.83
41 42	May-2006 June-2006			\$454,958,125 \$478,907,111	52,704,182 56,237,916		\$8.63 \$8.52
43	July-2006			\$475,070,520	55,170,867		\$8.61
44	August-2006			\$535,783,946	61,283,416		\$8.74
45 46	September-2008 October-2008			\$445,036,303 \$407,801,305	53,607,040 47,541,362		\$8.30 \$8.58
47	November-2006			\$343,043,000	37,612,998		\$9.12
48	December-2006			\$308,259,597	34,341,375		\$8.92
49 50	January-2007 February-2007			\$323,304,971 \$315,049,245	32,885,053 31,302,135		\$9,84 \$10.06
51	March-2007			\$315,125,669	31,978,842		\$9.85
52	April-2007			\$439,977,850	43,967,290		\$10.01
53 54	Mey-2007 June-2007			\$498,173,329 \$507,162,170	50,439,667 62,424,945		\$9.84 \$9.67
55	July-2007			\$567,142,633	59,664,514		\$9.34
58	August-2007			\$618,890,576	65,205,783		\$9.49
57 58	September-2007 October-2007			\$558,615,545 \$543,712,713	59,738,116 58,389,503		\$9.32 \$9.32
59	November-2007	•		\$362,267,131	36,728,105		\$9.86
60	December-2007			\$381,899,785	37,490,254		\$9.65
61 62	January-2008 February-2008			\$320,040,583 \$331,090,680	34,052,010 34,277,518		\$9.40 \$9.66
63	March-2008			\$376,709,843	38,070,469		\$9.90
64	April-2008			\$455,680,993	44,944,318		\$10.14
65 66	May-2008 Juna-2008			\$545,034,310 \$616,471,680	50,315,481 53,879,597		\$10.83 \$11.44
67	July-2008			\$810,281,822	52,618,399		\$11.60
68	August-2008			\$567,475,816	58,618,934		\$10.02
69	September-2008			\$562,747,850	52,845,857		\$10.65

Florida Power Light Company Docket No. 110001-EI Staffs 1st Sel of Interrogatories Interrogatory No. 3 Attachment I Page 2 of 2

	(A)	(8)	(C)	(D)	(E)	(F)	(G)
			TOTAL FUEL COST VARIA	NCE AND HEDGING EFF	ECTIVENESS		
		TOTAL UNHEDGED FUEL COSTS (NG & HO)	TOTAL HEDGING RESULTS {NG & HO) {Hedging Results Filings}	TOTAL HEDGED FUEL COSTS (NG & HO) (A3)	TOTAL HEDGED FUEL MMBTU (NG & HO) (A3}	COST/MMBTU (\$) W/O Hedging { B } / ( E )	COST/MMBTU (\$) W/ Hedging {D)/{E)
70	October-2008			\$412,989,246	45,118,220		\$9.15
71	November-2008			\$301,293,278	32,953,906		\$9.14
72	December-2006			\$266,843,838	27,845,935		\$9.58
73	January-2009			\$308,882,690	31,232,235		\$9.89
74	February-2009			\$277,125,102	30,350,985		\$9.13
75	March-2009			\$308,390,725	35,822,004		\$8,61
78	April-2009			\$361,924,374	43,665,896		\$8.29
77	May-2009			\$420,071,987	51,621,974		\$8.14
78	June-2009			\$437,354,250	53,261,123		\$8.21
79	July-2009			\$454,155,910	56,211,795		\$8.08
80	August-2009			\$470,396,258	59,122,515		\$7.96
81	September-2009			\$435,101,911	54,445,637		\$7.99
82	October-2009			\$430,017,719	50,776,313		\$8.47
83	November-2009			\$338,204,873	40,598,989		\$8.28
84	December-2009			\$302,279,124	33,205,647		\$9.10
85	January-2010			\$332,048,549	42,429,063		\$7.83
86	February-2010			\$230,719,338	33,563,990		\$6.87
87	March-2010			\$241,769,967	36,048,591		\$6.71
88	April-2010			\$252,121,082	38,929,908		\$6.48
89	May-2010			\$345,820,410	53,074,687		\$5.52
90	June-2010			\$407,930,289	58,604,550		\$6.96
91	July-2010			\$400,907,905	57,075,314		\$7.02
92	August-2010			\$408,354,619	58,000,687		\$7.04
93	September-2010			\$329,958,900	53,185,365		\$6.20
94	October-2010			\$292,217,560	47,507,226		\$8.15
95	November-2010			\$226,786,450	36,438,687		\$8.22
96	December-2010			\$289,429,172	41,799,126		\$6.92
97	TOTAL	\$31,590,472,236	-\$2,303,109,115	\$33,893,581,351	4,319,473,515		
98							
<del>9</del> 9				WEK	GHTED AVERAGE PRICE		\$7.85
100					VARIANCE		3.03
101					STANDARD DEVIATION		1.74

# EXHIBIT "C"

# **JUSTIFICATION TABLE**

## EXHIBIT C

COMPANY:	Florida Power & Light Company
TITLE:	List of Confidential Documents
DOCKET NO.:	110001-EI
DOCKET TITLE:	Fuel and Purchased Power Cost Recovery Clause
SUBJECT:	Staff's First Set of Interrogatories Nos. 1-3
DATE:	April 8, 2011

Interrogatory No.	Description	No. of Pages	Conf. Y/N	LINE NO./ COL. NO.	FLORIDA STATUTE 366.093(3) Subsection :	AFFIANT
				Lines 1-96 ,Col B-C	(a), (e)	G. Yupp
1	Attachment I	2	Y	Lines 99-101, Col F		
				Lines 1-96, Col B-C	(a), (e)	G. Yupp
2	Attachment I	2	Y	Line 99-101, Col F		
	Lines 1-96, Col B-C		Lines 1-96, Col B-C	(a), (e)	G. Yupp	
3	Attachment I 2		Y	Line 99-101, Col F		

Page 1 of 1

DOCUMENT NUMBER-DATE 02359 APR-8 = FPSC-COMMISSION CLERK

# EXHIBIT "D"

# AFFIDAVIT

### EXHIBIT D

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Fuel and Purchase Power Cost Recovery Clause with Generating Performance Incentive Factor Docket No. 110001-EI

STATE OF FLORIDA

COUNTY OF PALM BEACH

## AFFIDAVIT OF GERARD J. YUPP

**BEFORE ME**, the undersigned authority, personally appeared Gerard J. Yupp who, being first duly sworn, deposes and says:

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Wholesale Operations in the Energy Marketing and Trading Division Department. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification of Fuel Hedging Information. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information are comprised of trade secrets of FPL, which contain or constitute data pertinent to FPL's hedging program. Specifically, the documents contain information regarding FPL's monthly hedging results for natural gas and heavy fuel oil. The disclosure of this trade-secret information would provide other participants in the fuel and financial markets insight into FPL's hedging practices that would allow them to anticipate FPL's trading decisions and/or impair FPL's ability to negotiate, to the detriment of FPL and its customers. This information would also place FPL at a competitive disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of 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. Affiant says nothing further.

SWORN TO AND SUBSCRIBED before me this the day of 2011, by Gerard J. Yupp, who is personally known to me or who has produced ______ (type of identification) as identification and who did take an oath.

Notary Public, State of Florida

My Commission Expires:



DOCUMENT NUMBER-DATE

02359 APR - 8 =

**FPSC-COMMISSION CLERK** 

COMMISSIONERS: ART GRAHAM, CHAIRMAN LISA POLAK EDGAR RONALD A. BRISÉ EDUARDO E. BALBIS JULIE I. BROWN

### STATE OF FLORIDA



OFFICE OF COMMISSION CLERK ANN COLE COMMISSION CLERK (850) 413-6770

## Public Service Commission

## ACKNOWLEDGEMENT

DATE: April 8, 2011

TO: Scott A. Goorland

FROM: Marguerite H. Mclean, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket Number <u>110001-EI</u> or, if filed in an undocketed matter, concerning information provided in response to <u>staff's 1st set of interrogatories (Nos. 1-3) [DN 02360-11]</u>, and filed on behalf of <u>Florida Power &</u> <u>Light Company</u>. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.

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