FILED SEP 01, 2015 DOCUMENT NO. 05468-15 FPSC - COMMISSION CLERK



Maria J. Moncada Principal 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

September 1, 2015

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 **REDACTEI**

Re: Docket No. 150001-EI

Dear Ms. Stauffer:

I enclose for filing in the above docket an original and seven (7) copies of Florida Power & Light Company's ("FPL's") Second Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 09-190-4-1. The original includes First Revised Exhibit A, First Revised B (two copies), Second Revised Exhibit C and Second Revised Exhibit D. The seven copies do not include copies of the Exhibits.

First Revised Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. First Revised Exhibit B is an edited version of First Revised Exhibit A, in which the information FPL asserts is confidential has been redacted. Second Revised Exhibit C is a justification table in support of FPL's Second Request for Extension of Confidential Classification. Second Revised Exhibit D contains the affidavits in support of FPL's Second Request for Extension of Confidential Classification. Also included in this filing is a compact disc containing FPL's Second Request for Extension of Confidential Classification and Second Revised Exhibit C, in Microsoft Word format.

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

COM Sincerely AFD + Redacted + CN APA) oncada Maria/J ECO ENG Enclosure Counsel for Parties of Record (w/ copy of FPL's Second Request for Extension of GCL cc: Confidential Classification) **IDM** TEL 2809802 CLK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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Docket No: 150001-EI Date: September 1, 2015

FLORIDA POWER & LIGHT COMPANY'S SECOND REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF MATERIALS PROVIDED PURSUANT TO AUDIT NO. 09-190-4-1

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 Second Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 09-190-4-1 ("Confidential Information"). In support of this request, FPL states as follows:

1. On October 21, 2009 FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("October 21, 2009 Request"). By Order No. PSC-12-0167-CFO-EI, dated April 2, 2012 ("Order 0167"), the Commission granted FPL's October 21, 2009 Request. FPL adopts and incorporates by reference the October 21, 2009 Request and Order 0167.

2. On September 30, 2013 FPL filed a First Request for Extension of Confidential Classification of the Confidential Information, which included First Revised Exhibits C and D ("September 30, 2013 Request"). By Order No. PSC-14-0119-CFO-EI, dated March 5, 2014 ("Order 0119"), the Commission granted FPL's September 30, 2103 Request. FPL adopts and incorporates by reference the September 30, 2013 Request and Order 0119.

3. The period of confidential treatment granted by Order 0119 will soon expire. Some of the Confidential Information that was the subject of FPL's September 30, 2013 Request and Order 0119 warrants continued treatment as proprietary and confidential business

information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its Second Request for Extension of Confidential Classification.

4. Included herewith and made a part hereof are First Revised Exhibit A, First Revised Exhibit B, together with Second Revised Exhibit C to reduce the number of pages for which confidential treatment is sought.

5. First Revised Exhibits A and B consist of highlighted and redacted copies of the specific work papers where FPL has determined that a portion of the information previously designated as confidential requires continued confidential treatment. Where entire pages of a work paper are confidential, FPL has included only identifying cover pages in Second Revised Exhibit B.

6. Second 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 affiants who support the requested classification.

7. Also included is Second Revised Exhibit D which contains the Affidavits of Gerard J. Yupp, Elizabeth Fuentes and Robert Sendler in support of this request.

8. FPL submits that the information identified in Second Revised Exhibit C continues to be proprietary confidential business information within the meaning of section 366.093(3), Florida Statutes. 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.

9. As explained in greater detail in the affidavits included in Second Revised Exhibit D indicate, certain documents contain information concerning bids or other contractual data the disclosure of which would impair the efforts of FPL or its vendors to contract on favorable terms. This information is protected by Section 366.093(d), Fla.Stat.

10. Additionally, some documents contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. This information is protected by Section 366.093(3)(e), Fla. Stat.

11. Nothing has changed since the Commission entered Order 0119 to render the Confidential Information identified in Second Revised Exhibit C stale or public, such that continued confidential treatment would not be appropriate.

12. 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 and affidavits included herewith, Florida Power & Light Company

respectfully requests that its Second Request for Extension of Confidential Classification be granted.

Respectfully submitted,

John T. Butler Assistant General Counsel - Regulatory Maria J. Moncada Principal Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408 Telephone: (561) 304-5795 Facsimile: (561) 691-7135 Email: maria.moncada@fpl.com

By:

Maria J. Moncada Florida Bar No. 0773301

CERTIFICATE OF SERVICE Docket No. 150001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Second Request for Extension of Confidential Classification* has been furnished by electronic service on this <u>1st</u> day of September, 2015 to the following:

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

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

James D. Beasley, Esq. J. Jeffrey Wahlen, Esq. Ashley M. Daniels, Esq. Ausley & McMullen Attorneys for Tampa Electric Company P.O. Box 391 Tallahassee, Florida 32302 jbeasley@ausley.com jwahlen@ausley.com adaniels@ausley.com

Robert Scheffel Wright, Esq. John T. LaVia, III, Esq. Gardner, Bist, Wiener, et al Attorneys for Florida Retail Federation 1300 Thomaswood Drive Tallahassee, Florida 32308 schef@gbwlegal.com jlavia@gbwlegal.com Andrew Maurey Michael Barrett Division of Accounting and Finance Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850 mbarrett@psc.state.fl.us amaurey@psc.state.fl.us

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

Jeffrey A. Stone, Esq. Russell A. Badders, Esq. Steven R. Griffin, Esq. Beggs & Lane Attorneys for Gulf Power Company P.O. Box 12950 Pensacola, Florida 32591-2950 jas@beggslane.com rab@beggslane.com srg@beggslane.com

James W. Brew, Esq. Owen J. Kopon, Esq. Laura A. Wynn, Esq. Attorneys for PCS Phosphate - White Springs Stone Mattheis Xenopoulos & Brew, PC 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007-5201 jbrew@smxblaw.com ojk@smxblaw.com laura.wynn@smxblaw.com Robert L. McGee, Jr. Gulf Power Company One Energy Place Pensacola, Florida 32520 rlmcgee@southernco.com

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

Erik L. Sayler, Esq. John J. Truitt, Esq. J. R. Kelly, Esq. Patricia Christensen, Esq. Charles Rehwinkel, Esq. Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, Florida 32399 kelly.jr@leg.state.fl.us christensen.patty@leg.state.fl.us rehwinkel.charles@leg.state.fl.us sayler.erik@leg.state.fl.us truitt.john@leg.state.fl.us Mike Cassel, Director/Regulatory and Governmental Affairs Florida Public Utilities Company 911 South 8th Street Fernandina Beach, Florida 32034 mcassel@fpuc.com

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

Jon C. Moyle, Esq. Moyle Law Firm, P.A. Attorneys for Florida Industrial Power Users Group 118 N. Gadsden St. Tallahassee, Florida 32301 jmoyle@moylelaw.com

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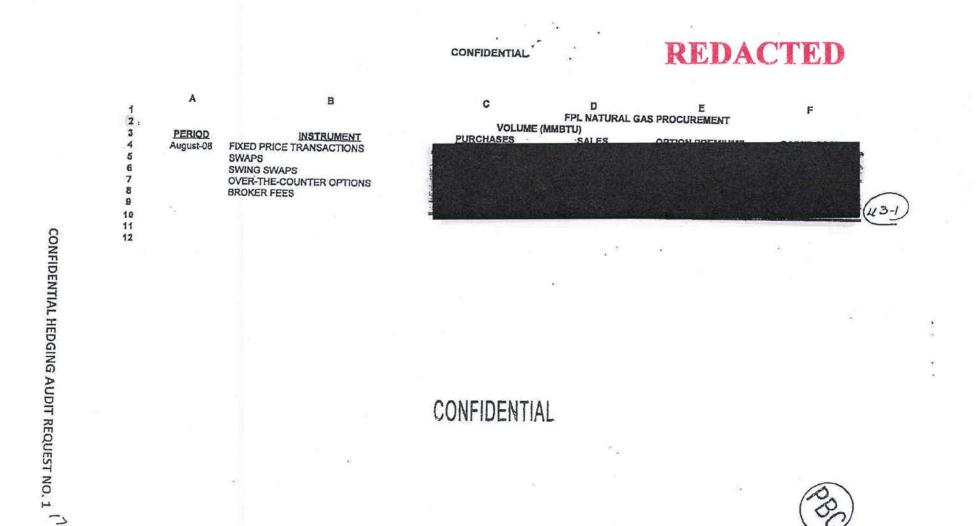
* The exhibits to this Request are not included with the service copies, but a copy of First Revised Exhibit B, Second Revised Exhibit C and Second Revised Exhibit D are available upon request.

EXHIBIT A

CONFIDENTIAL FILED UNDER SEPARATE COVER

EXHIBIT B

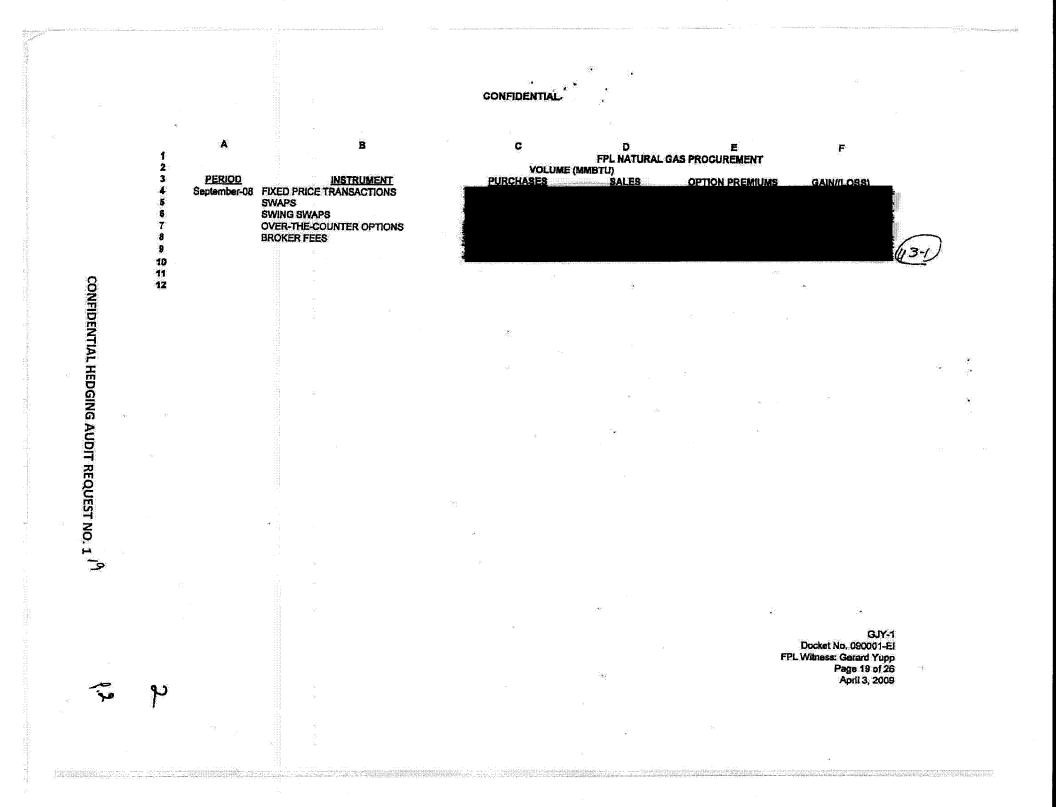
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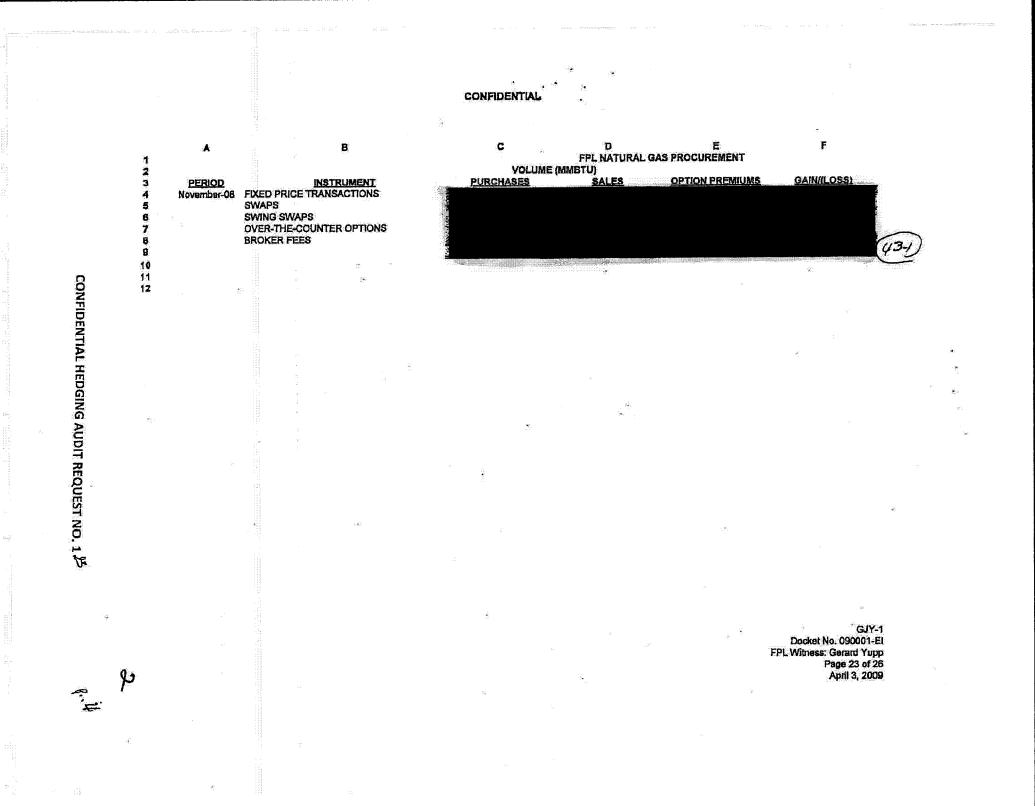
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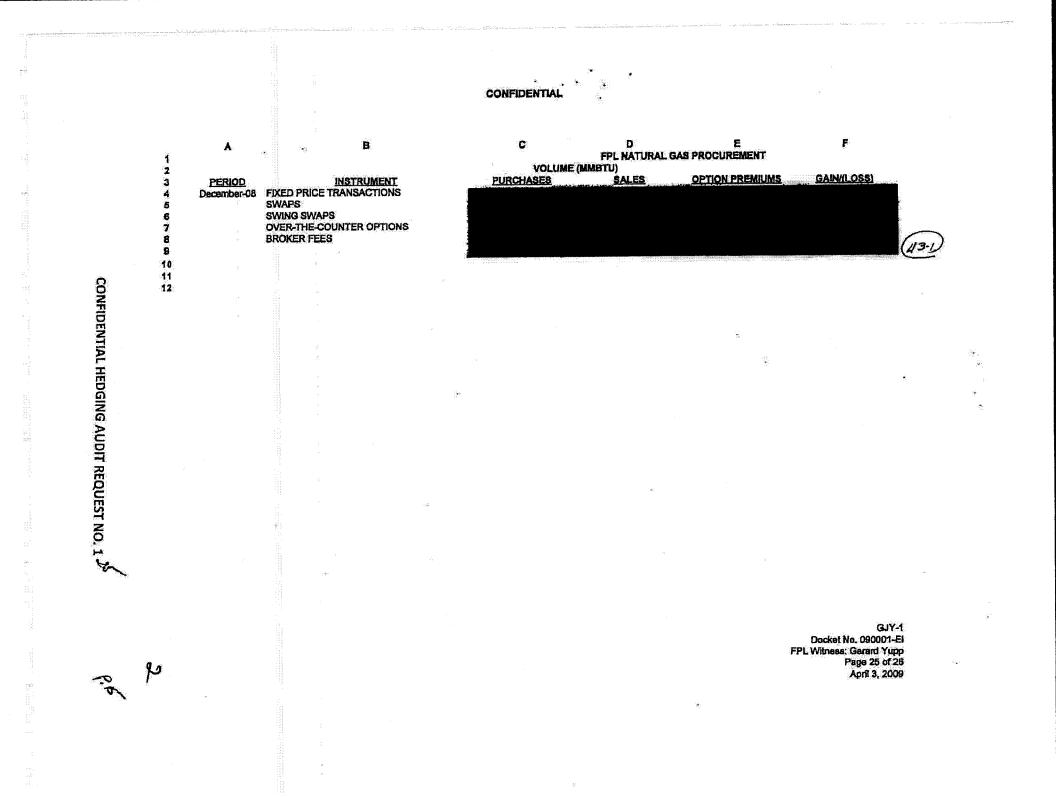


GJY-1 Docket No. 090001-El FPL Witness: Gerard Yupp Page 17 of 26 April 3, 2009



CONFIDENTIAL D E FPL NATURAL GAS PROCUREMENT VOLUME (MMBTU) A B C F 1 23 INSTRUMENT FIXED PRICE TRANSACTIONS SWAPS SWING SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES OPTION PREMIUMS PERIOD October-08 PURCHASES SALES GAIN/(LOSS) 4 5 6 7 8 9 10 11 12 CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1 ъà? GJY-1 Docket No. 090001-EI FPL Witness: Gerard Yupp Page 21 of 26 April 3, 2009 ۴ تن آ





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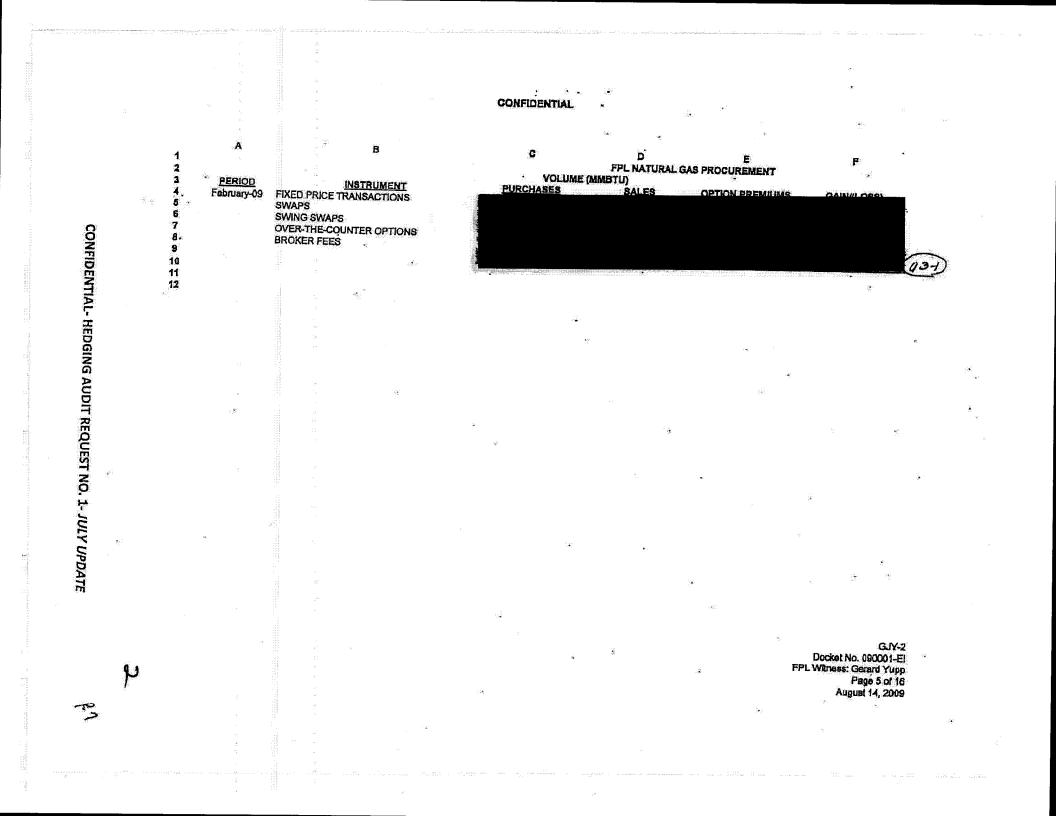
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GJY-2 Docket No. 090001-EJ FPL Witness: Gerard Yupp Page 3 of 16 August 14, 2009

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GJY-2 Docket No. 080001-E1 FPL Witness: Gerard Yupp Page 7 of 16 August 14, 2009

PROCUREMENT

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C D E FPL NATURAL GAS PROCUREMENT VOLUME (MMBTU) PURCHASES SALES OPTION RECOVER

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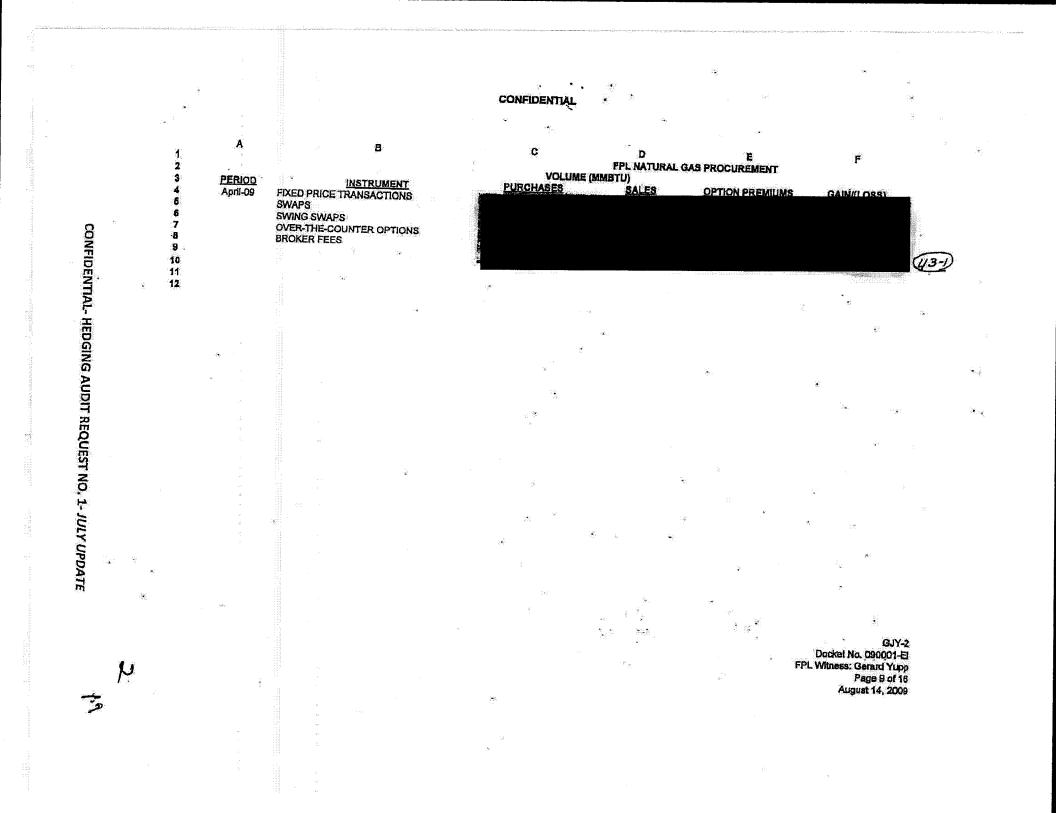
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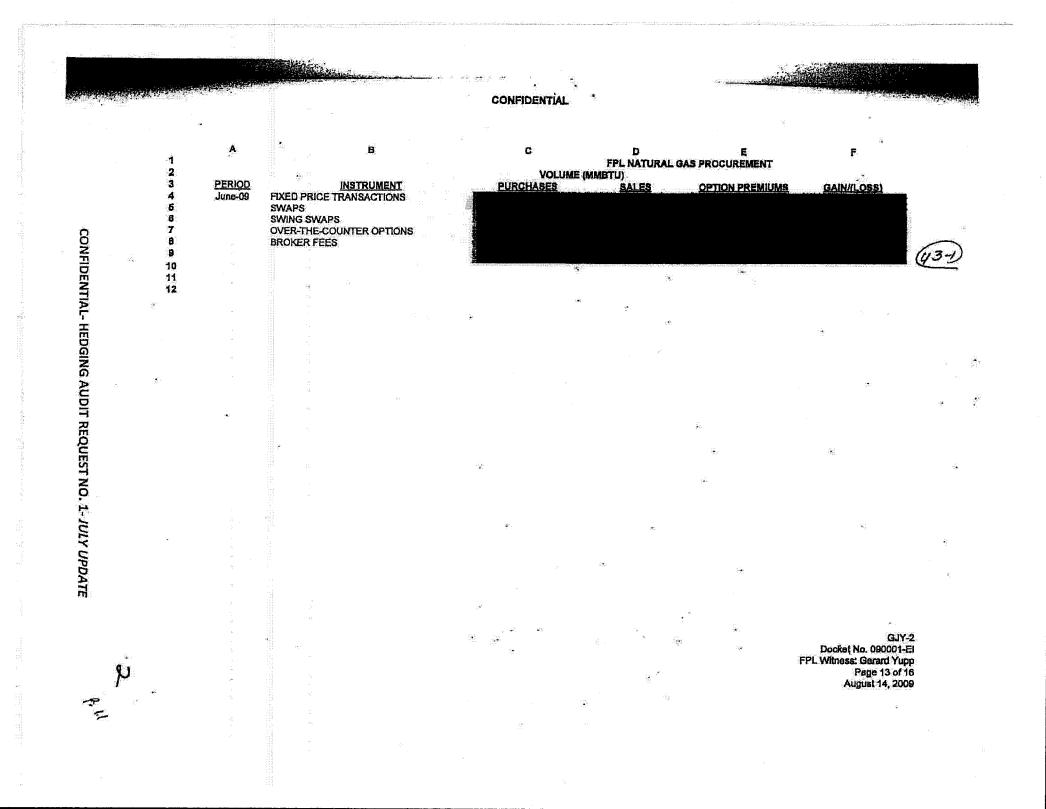
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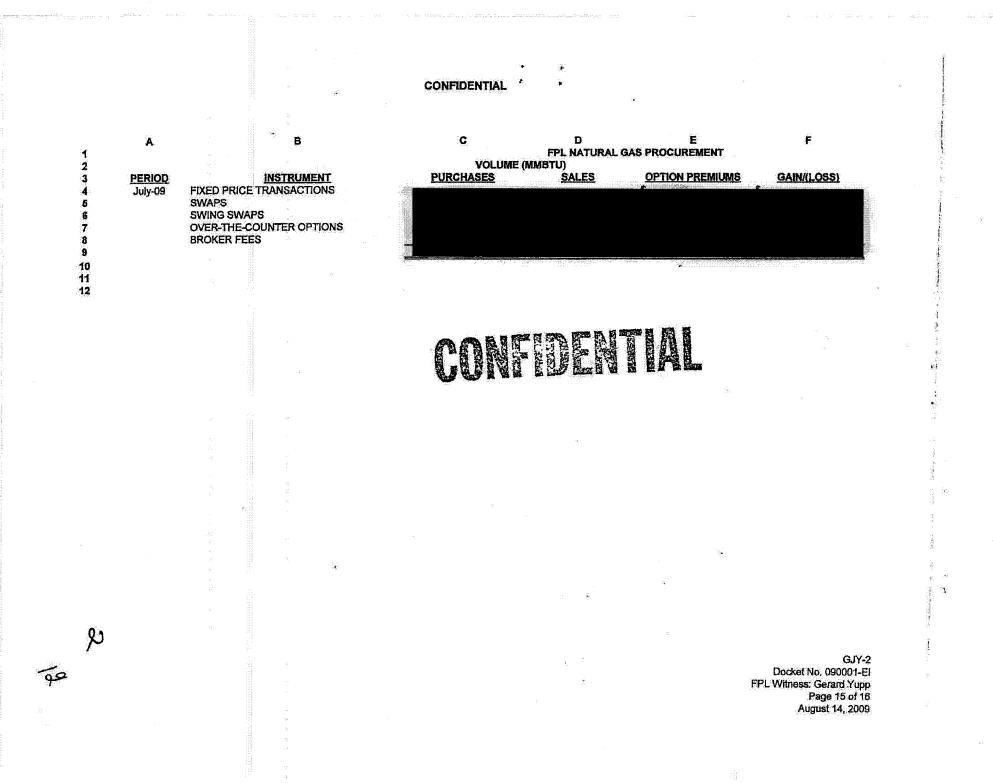
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Hedging Audit Workpaper Number 9

[Pages 1 through 4]

External Audit

Hedging Audit 2009 - Docket No. 090001 Audit Request No. 1

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Q: Please provide:

- 1. The August 1, 2008 to July 31, 2009 Hedging Filing.
 - 2. The filed testimony with FPL's filed for the above period Hedging Plan.
- 3. A list of internal audits related to Hedging for above period.
- 4. The Monthly FPL Derivatives Settlements All Instrument Report form August 1, 2008 to July 31, 2009.

5. A representation letter that describes in detail its accounting treatment for transaction cost associated with its financial hedging program.

- 6. A schedule of each financial hedging instrument that was executed (closed) by month from August 1, 2008 to July 31, 2009, that includes the following information:
 - a. Total commodity price.
 - b. Total transaction cost.
 - c. Total other cost.
 - d. Total cost.
 - e. Total gain/lost at settlement.
- 7. A list of all physical hedging transactions for the year ended August 1, 2008 to July 31, 2009.
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The January 2008 through December 2008 Hedging Activity Filing dated April 3, 2009 (unredacted) has been included.

2. The 2009 Hedging/Risk Management Plan (unredacted), with testimony, dated
 33 September 2, 2008 has been included.

3. There have been no Internal Auditing reports related to Hedging during the period in question. $I \circ DR # I$

- 26 4. Monthly reports from August 2008 to June 2009 have been included.
- 27 5. A representation letter has been included.
- 28 6. a) This information is included in part 4 data.
- b) This information has been included. See ICE and Newedge documentation included with response.

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1

- 3/ c) This information is included in part 4 data.
- 32 d) This information is included in part 4 data.
- 33 e) This information is included in part 4 data.

2008 Hedging Strategy (TFB-4, Items 2 and 8)

The principal focus of this Risk Management Plan, as will be the case for future plans, is on the hedging strategy that FPL intends to implement in the upcoming year for placing hedges on fuel purchases in the year or years thereafter. For example, as discussed below, FPL is presenting its 2009 hedging strategy that will apply to hedging FPL's projected 2010 fuel oil and natural gas requirements. However, for transitional purposes FPL is also including in this year's plan information pertaining to its 2008 hedging strategy for projected 2009 natural gas and heavy fuel oil requirements.

FPL plans to hedge a portion of its projected 2009 residual fuel oil and natural gas requirements during 2008. Absent special circumstances (e.g. a hurricane that FPL concludes will substantially impair market functions). FPL is implementing its 2008 hedging program within the following parameters:

Natural Gas

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 FPL will hedge approximately and of its projected 2009 natural gas requirements within the Hedging Window during 2008. This hedge percentage is within FPL's system base load requirements. FPL will hedge approximately and of each individual month's projected natural gas requirements.

2) FPL will utilize

hedge its projected natural gas requirements.

FPL will execute its natural gas hedges for 2009 from through through as shown below;

Hedging Window

During each month of the Hedging Window, FPL will hedge the percentages shown of its projected 2009 natural gas requirements. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.

4) Re-balancing will be executed per the attached PPS. Once the initial monthly target volumes have been hedged, rebalancing will be executed to maintain the hedge percentages inside approved tolerance bands. The monthly tolerance bands for natural gas are an an attached ^ATherefore, the minimum and maximum monthly hedge percentages are and and an attached ^B respectively.

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1

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2009 Hedging Strategy (TFB-4, Items 2 and 8)

FPL plans to hedge a portion of its projected 2010 residual fuel oil and natural gas requirements during 2009. 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:

Natural Gas

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- FPL will hedge approximately find of its projected 2010 natural gas requirements within the Hedging Window during 2009. This hedge percentage is consistent with 2009 hedge levels and is within FPL's system base load requirements. FPL will hedge approximately for each individual month's projected natural gas requirements.
- FPL will utilize hedge its projected natural gas requirements.
- FPL will execute its natural gas hedges for 2010 from through through as shown below:

Hedging Window

During each month of the Hedging Window, FPL will hedge the percentages shown of its projected 2010 natural gas requirements. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.

4) 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. The monthly tolerance bands for natural gas are stated.^A Therefore, the minimum and maximum monthly hedge percentages are stated.^A and stated is respectively.

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1

Heavy Fuel Oil

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- FPL will hedge approximately and of its projected 2010 heavy fuel oil requirements. This hedge percentage is consistent with 2009 hedge levels. FPL will hedge approximately and of each individual month's projected heavy fuel oil requirements.
 FPL will utilize the second second
- FPL will utilize hedge its projected heavy fuel oil requirements.
 FPL will execute its heavy fuel oil hedges for 2010 from
 - through **through through the the through the the the the through the the t**

Hedging Window

During each month of the Hedging Window, FPL will hedge the percentages shown of its projected 2010 heavy fuel oil requirements. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.

4) FPL intends to rebalance its heavy oil 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. The monthly tolerance bands for heavy fuel oil are formed. Therefore, the minimum and maximum monthly hedge percentages are formed and former.

Hedging Window Modification

Market price behaviors are changing constantly.

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CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1

Hedging Audit Workpaper Number 42-2

[Pages 1 through 26]

Trading & Risk Management Policy

Hedging Audit Workpaper Number 42-3

[Pages 1 through 78]

Trading & Risk Management Policy

Hedging Audit Workpaper Number 42-3/1

[Page 1]

Summary of Changes

Hedging Audit Workpaper Number 43-3/2

[Page 1]

Summary of Changes

Florida Power & Light, Co. A3a Hedging Dckt 090001-EI Audit 09-190-4-1 TYE Aug 08 - Jul 09 Hunnau Title:

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The company provided us with a preliminary schedule of Gains/Losses for the period of August 2008 to July 2009 (43-1, 43-2, & 43-3). From this schedule we decided to sample one month for the natural gas, May 2009 (43-2/1), and one month for heavy oil, August 2008 (43-3/1). These months were selected based on the gains/losses.

The Hedging losses for the months May 2009 for Gas and August 2008 1. Oil were traced to the general ledger. It is recorded in the cost of gas and oil in account 151, through an average unit price calculation. This is reflected in the Monthly Gas Closing Report (43-2/3) and Allocation of Financial Instrument (43-No errors found.

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In addition to the schedule Summary of Gains and Losses, the company provided monthly detail reports called "FPL Derivative Settlements-All Instruments". These reports show each deal type, quatity, price, premium, and gains/losses. The gains/losses schedules were reconciled from the Summary schedule to the FPL Derivative Setttlements Report (43-1). No errors were found.

Natural Gas Testing - May 2009

Using the Derivatives Report, staff sampled the natural gase Swaps from Counterparty Barclays Bank, PLC. These deals were traced to the Swap Deal Entry, the Confirmation of the Commodity, Settlement Price Report, and Purchase statement. All these deals were recalculated. (43-2/1)

Heay Oil Testing - August 2008

A schedule was prepared of the over the counter options and swaps detailed by counterparties. It was determined that Morgan Stanley Capital Group, Inc. the largest Morgan Stanley Capital Group, Inc. due to the largest Swaps (43-3/1).

Lehman Brothers Bankruptcy Settlement

Lehman Brothers was one of the company's counterparties for heavy oil. Since the Lehman Brothers was insolvent in September 2008, FPL calculated the total costs (with interest) to be reimburse to Lehman Brothers was and to

Nextera Power Enegy Marketing (formerly known as FPI D Marketing (42-3/2)) was

(43-1/1-5). See finding on WP 43-1/3. WP 43-1/1-3 contained the detail of the Lehman Brothers deals. The deals were

randomly reconciled to WP 43-1/1-4, which displayed the Deal #\Type, Trade Date, and Contract Month.

The legal cost associated with the settlement as of September 2009 was \$12,447.43 (43-1/1-8).

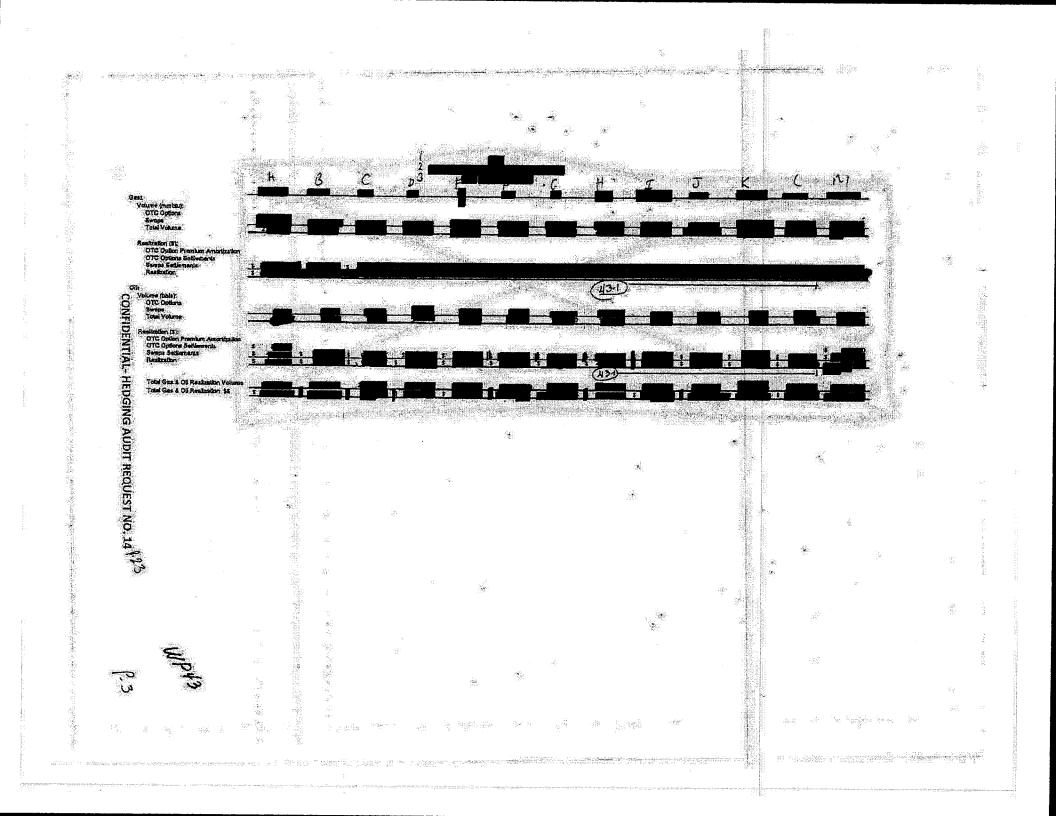
According to the company, the settlement has not been disclosed in the financial statement or filing (43-1/1-7).

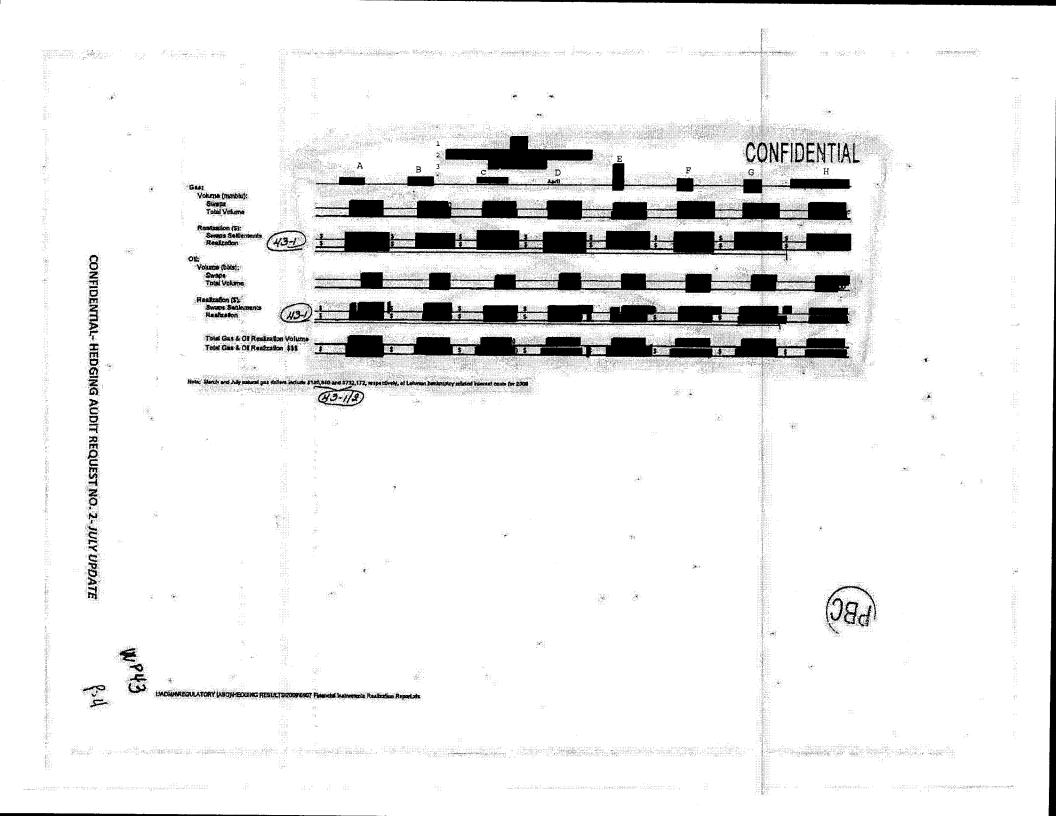
A request was written in which we asked the company to provide a representation letter detailing its accounting treatment for transaction cost associated with its financial hedging program (43-4).

The company also incurred transaction costs from Intercontinental Exchange Inc. (ICE) (43-5) and Newedge USA, LLC (43-5/2). These costs are expensed in the month they are incurred and flow through account 232.135 to account 151 (Inventory), however, they are not included in the FPL Derivative Settlements All Instruments Reports. No errors found.

WP 43.doc

WP 43 p. 1





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FLORIDA POWER AND LIGHT SUMMARY OF LEHMAN BROTHERS BANKRUPCY TEST YEAR ENDED JULY 31, 2009 KATHY WELCH AND YEN NGO SEPTEMBER 28, 2009

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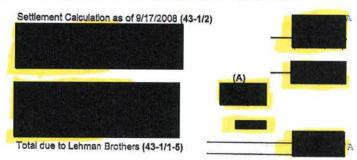
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As a result of the Lehman Brothers' defaulting under the ISDA (International Swap Dealers Associations, Inc.) Master Agreement in September 2008, Florida Power and Light Company terminated its hedging transactions with Lehman Brothers Commodity Services.

FPL is in the process of settling with Lehman Brothers for the amount owed for strip trading. FPL uses strip trading when hedging positions for several months forward. A market participant can lock in an average price for several months at a time by simultaneously opening a futures position in each of the months to be hedged through a single transaction. The average of the futures contracts over the period is the price level of the hedge.

The estimated early termination settlement paid to Lehman Brothers from Florida Power and Light Company and its affiliate, Nextera Energy Power Marketing (NEPM), formerly known as FPL Power Energy Marketing, in a letter agreement dated August 6, 2009 was provide the formerly and the payment of Lehman as follows:



The actual amounts included in the hedging filing made with the Commission in 2008 was (43-1) and in 2009 (43-1). This totals (43-1) (43-1) which is more than the amount paid of (43-1). The settlement has yet to be approved by the bankruptcy court. While additional adjustments are not anticipated at this time, future adjustments may be necessary after final court approval based on the methodology and interest rates used in the calculation of the discounted amount.

FPL determined these amounts by taking the volumes times for each transaction for each month (43-1/1-3). They took the difference between the Henry Hub price for the month the deal was to close using the Gas Daily Henry Hub (43-1/1-3/2) in the settlements column on September 26, 2008. They then discounted these costs to get back to a September amount. On September 17, 2008, the utility made replacement hedges. Since these replacement hedges were at a higher cost than the September 26 Henry Hub settlement prices, the utility took the difference between the cost of these hedges and the September 26, 2008 settlement prices and reduced the loss to Lehman Brothers for these amounts. An interest calculation was also added since the amounts have still not settled (43-1/2). Therefore, there was no effect of the bankrupcy. FPL would have had a loss even if Lehman did not go bankrupt because the cost of gas was higher when these futures were purchased than the prices in September 2008. By bringing the cost of the new instruments to the closing price, any gain or loss would have been what would have occurred if the bankruptcy had not taken place.

To verify that the company did replace the Lehman Brothers deals with other counterparties, the deal units from WP 43-1/1-3 were totaled:



The deal prices and the settlement prices of some of the Lehman Brothers transaction and the replacement transactions were also recalculated to confirm that the company reduced the loss. No differences were noticed (WP 43-1/1-3/4).

The legal fee (charged to account 923.200 Outside Services – Legal-in base rates and not in fuel clause) incurred in the settlement process up to September 2009 was \$12,447.43 (43-1/8). It does not appear that any of these legal costs were charged to Nextera. FPL has decided to allocate 50% of the legal costs to Nextera (43-1/8-4).

WP 43 p. 6

Florida Power & Light, Co. 40725/09 9/8/09 A3a Hedging Dckt 090001-EI Audit 09-190-4-1 TYE Aug 08 - Jul 09 Jectiny Louins Haves) Title:

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COMPANY: FPL TITLE: SUMMARY OF HEDGING TRANSACTION TESTING PERIOD: DATE: YEAR ENDED JULY 31, 2009 DATE: July 21, 2009 AUDITOR: YN

The filing summary of gains/losses was traced to the Devivative Settlements - All Instruments,

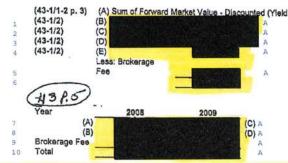
The filing summary or generous NATURAL GAS (A3-9) A sample was taken of gas and oll hedging transactions from the monthly schedules based on the highest months of gains/losses. At the time of the sample selection, the up to date filing was May 2009. The month of May 2009 was selected for reviewing due to its highest bas.

YR.	MONTH	GAIN/(LOSS)	BROKERAGE FEES	TOTAL	1
2008	August	In the second second		TO TALL Y	1
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2008	October				
2008	November				
2008	December	AND REAL PROPERTY.			
2009	January.				
2009	February	Traves V Soft			
2009	March	Real Property and			-
2009	April	The second second			1 235
2009	May	100 States and a state			43-2/1
2009	June				10
2009	July				
Total	Total	A CONTRACTOR OF A CONTRACTOR			
		Contraction of the latest	THE REAL PROPERTY AND	(43-2)	

RECONCILIATION OF GAS TO DERIVATIVE SETTLEMENT

YR.	MONTH	GAIN/(LOSS) SWAPS	BROKERAGE	TOTAL	BROTHERS	
2008	September	Contraction of		a state of the sta	and the second second	
2008	December					
2009	March					
2009	July					
Total	Total					
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(A) Sum of Forward Market Value - Discounted (Yield Curve)

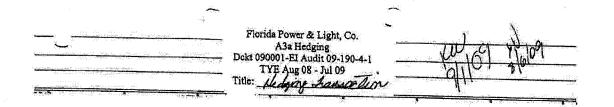


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Hedging Audit 2009 - Docket No. 090001 Audit Request No. 4, Part 1

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Q: Please reconcile the natural gas losses from the filing to the Derivative Settlements for the months of September and December 2008 (see attachment).

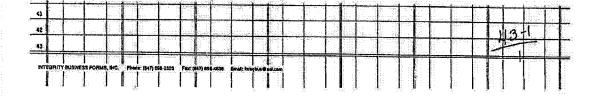
131

FJP3 September - Commodity Services Inc. (Lehman) declared bankruptcy, and became a defaulting party Commodity Services Inc. (Lehman) declared bankruptcy, and became a defaulting party hedging deals with Lehman on that date and replaced those volumes with transactions executed with other counterparties. Additionally, FPL calculated an early termination settlement estimate in accordance with the terms of the ISDA Master Agreement. The calculated amount of **settlement** was included in the September 2008 hedging activity results. 43-112)

13. 131

December --Legal and financial issues related to the Lehman bankruptcy had not been finalized by year end 2008 and the estimated settlement amount had not been forwarded to Lehman. Therefore, FPL recalculated the estimated early termination value and applied an for the time from September 17th 2008 to year end. In addition, FPL calculated an updated discounted mark-to-market value for the Lehman transactions as of December 31st. That updated value was a more timely representation of the terminated Lehman deals and has since been used in settlement discussions and related calculations. The sum of the difference between the September 2008 and December 2008 discounted values plus the interest for the period equaled **setup of** This amount was included in the December 2008 hedging activity results. 43-112

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 4



CONFIDENTIAL Hedging Audit 2009 - Docket No. 090001 Audit Request No. 6, Part 1 C: Per Document Request 4, item #1, please provide the supporting documentation of how the company arrived at the differences recorded in the filing for the months of September and December 2008 A: The September 2008 report showing the discounted mark-to-market value for Lehman Brothers Commodity Services, Inc. transactions has been included with this response. The detailed transaction information summarized in that report has also been included with this response. ĩ: 2 Title: A3a I Dekt 090001-EI HEDGING AUDIT REQUEST NO. Florida Power & Light, Co The December 2008 report showing the discounted mark-to-market value for Lehman Brothers Commodity Services, Inc. transactions has been included with this response. The December adjustment is equal to the difference between the H September and updated December discounted mark-to-market values, Aug 08 ^AThe calculations are detailed below. The summary values can be found on the December 2008 report included with this response. Hec Audit 09-190-4-1 Total September 2008 discounted mark-to-market early termination settlement value 28.3 6 A 8 Total December 2008 discounted mark-to-market early termination settlement value -1/1-4 7.3 Difference between September and updated December discounted m-t-m values cosumed 43-1/1-4P2 O December adjustment to include updated/corrected discounted m-t-m settlement value and accumulated interest 10 (13-1h (A 12 Difference in due to the decimat in the interest rate. PBC I

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HEDGING AUDIT REQUEST NO. 6

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Hedging Audit Workpaper Number 43-1/1-3

[Pages 1 through 3]

Hedging Audit 2009 – Docket No. 090001 Audit Request No. 16

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SOURCE DR #16

Q: [Please describe the calculation used to arrive at the Forward Market Value.]

A: The forward market value is calculated by first, subtracting the NYMEX Henry Hub natural gas futures contract price, for the appropriate month, from the deal price. Then that result is multiplied by the deal volume. For example,

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Hedging Audit Workpaper Number 43-1/1-3/3

[Page 1]

Florida Power & Light, Co. A3a Hedging Dckt 090001-EI Audit 09-190-4-1 TYE Aug 08 - Jul 09 Title: <u>Baaloulation</u> A Ocheult Manuaetter

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WP 43-1/1-3/4 P. 3

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Hedging Audit Workpaper Number 43-1/1-4

[Pages 1 through 2]

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Hedging Audit 2009 – Docket No. 090001 Audit Request No. 16, Part 2b

Q: [Please show how the Forward Market Values were discounted and provide the factors used to calculate the amounts shown in the Forward Market Value – Discounted (Yield Curve) column.]

A: The discounted forward market value, labeled as Forward Market Value – Discounted (Yield Curve), in the September 2008 spreadsheet is calculated by multiplying the Forward Market Value and the Discount Rate for the appropriate month. The result is the

1 discounted forward market value. For example,

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AThe Discount Rates for October 2008. through September 2038 have been included as part of this response.

The Discount Rate is based on a yield curve, which is composed of three basic interest rates that are readily observable in the market place:

The market yield of each of these three components is updated daily through an electronic data feed into the mark-to-market software application.



LEHMAN BROTHERS

FPSC

NFIDENTIAL

August 6, 2009

FLORIDA POWER & LIGHT COMPANY P.O. Box 14000 Juno Beach, Florida 33408

Ladies and gentlemen,

Re: The Bank of Nova Scotia, New York Agency, Letter of Credit No. 10050004/80085 and Letter of Credit No. 10090121/80085

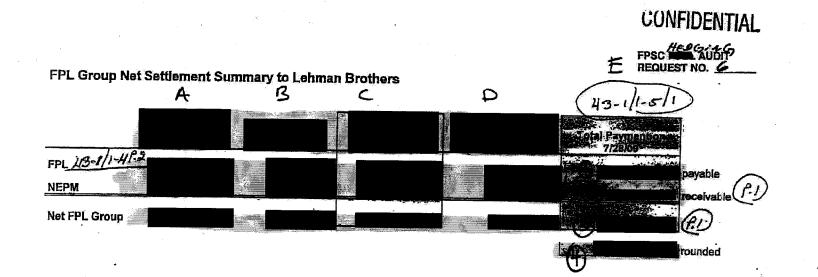
We refer to the ISDA Master Agreement dated as of August 14, 2006 between Lehman Brothers Commodity Services Inc. ("Lehman") and Florida Power & Light Company ("FPL"), as amended (the "FPL Master Agreement") and that certain Inrevocable Non-Transferable Standby Letter of Credit No. 10050004/80085 established by The Bank of Nova Scotia, New York Agency on July 25, 2007 in favor of Lehman for the account of FPL, as amended (the "FPL Letter of Credit"). We also refer to the ISDA Master Agreement dated as of January 30, 2007 between Lehman Brothers Commodity Services Inc. and NextEra Energy Power Marketing, LLC ("NEPM"), formerly known as FPL Energy Power Marketing, Inc. as amended (the "NEPM Master Agreement" and together with the FPL Master Agreement, the "Master Agreements") and that certain Inrevocable Non-Transferable Standby Letter of Credit No. 10090121/80085 established by The Bank of Nova Scotia, New York Agency on June 12, 2008 in favor of Lehman for the account of NEPM, as amended (the "NEPM Letter of Credit" and together with the FPL Letter of Credit, the "Letters of Credit").

On the same date of the receipt of payment from FPL in the amount of representing the net settlement amount and interest calculated by FPL and NEPM, Lehman agrees to release the Letters of Credit by faxing to The Bank of Nova Scotia, New York Agency at facsimile number 212-225-6464 and sending by overnight mail to One Liberty Plaza, New York, NY 1006 Attn: Sandra Edwards, phone number 212-225-5424, a duly authorized signed statement, Referencing Letters of Credit No. 10050004/80085 and 10090121/80085, that Lehman has no claims against the Letters of Credit with a request to The Bank of Nova Scotia, New York Agency that it cancel the Letters of Credit.

Lehman, FPL and NEPM agree to continue to work together in good faith to complete a settlement with respect to claims under the Master Agreements.

Other than the release of the Letters of Credit, this letter agreement is made without prejudice or limitation to any rights or remedies Lehman or its affiliates may have under any agreement(s) or other document(s) related to the Master Agreements or the transactions thereunder or applicable law and Lehman hereby reserves all rights and remedies under such agreement(s), document(s) and applicable law. Nothing herein shall be construed as an admission of any fact or the establishment of any position by or on

> LEHMAN BROTHERS COMMODITY SERVICES INC. 1271 SIXTH AVENUE, 40th FLOOR, NEW YORK, NEW YORK 10020



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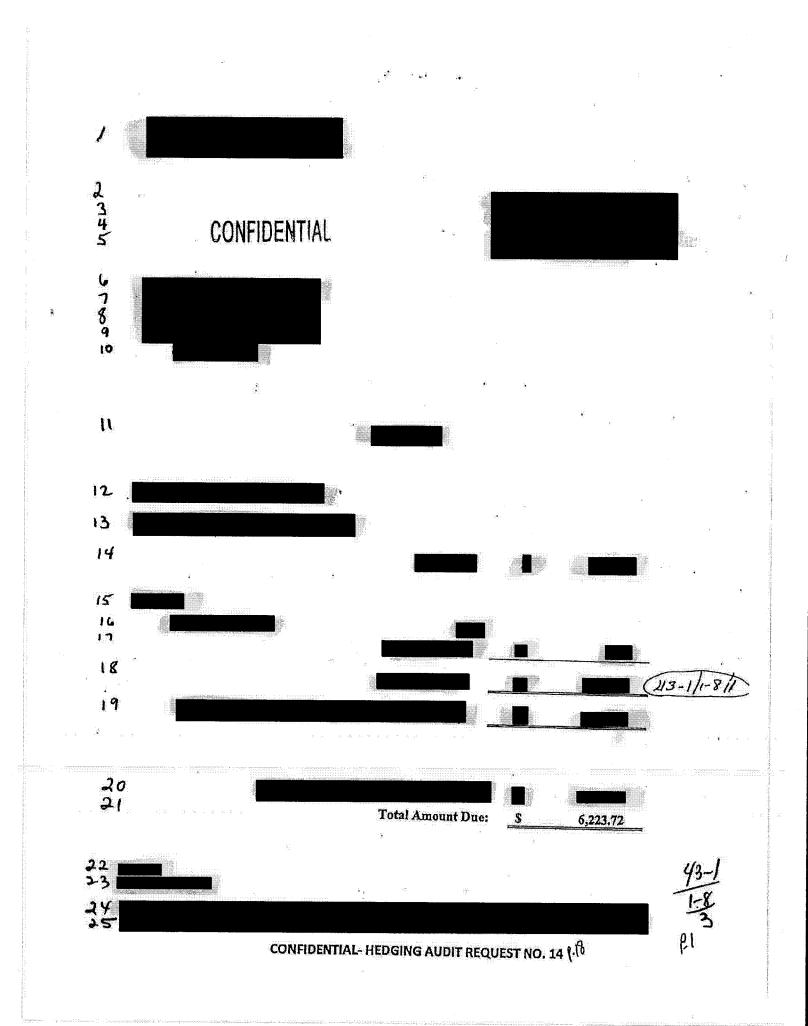
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Hedging Audit Workpaper Number 43-1/1-6

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Hedging Audit Workpaper Number 43-1/1-8/2

[Pages 1 through 4]



Hedging Audit Workpaper Number 43-1/1-8/3

[Pages 2 through 5]

Hedging Audit 2009 – Docket No. 090001 Audit Request No. 13

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Q: Please explain how the company evaluated the credit risk of Lehman Brothers based on the Risk Management Plan.

A: Credit risk management includes appropriate creditworthiness review and monitoring processes, the request for collateral if deemed necessary, and the inclusion of contractual risk mitigation terms and conditions whenever possible. Credit risk mitigation measures include collateral threshold amounts, cross default amounts, payment netting, and set-off agreements.

As part of our Risk Management Plan, the FPL Credit Department adhered to approved credit policies and procedures, in addition to normal daily margining procedures agreed to in master agreements executed with Lehman Brothers ("Lehman"). With respect to FPL's exposure to Lehman, during the economic downturn experienced in late 2007 and through their bankruptcy filing in 2008, the Credit Department monitored and evaluated the portfolio transactions on a daily basis. The FPL Legal Department was consulted as part of additional contract reviews and updates to ensure a thorough understanding of the master agreement rights specified in the terms and conditions. Senior Management was kept up to date on exposure, negotiations to reduce exposure and current events related to Lehman.

As it became clear that many financial institutions were having difficulty, discussions were initiated with several vulnerable counterparties to find ways to reduce or eliminate exposure for EMT. Some counterparties were placed on a "watch list", limited to lower 1 dollar or tenor limits or placed on a "Do Not Trade" list.

^AAs conditions worsened, all

proposed transactions with Lehman needed to be reviewed in order to determine if the transaction could potentially increase risk to Lehman. If the proposed transaction would add risk to the portfolio, it would not be approved. Lehman was one of many financial institutions where additional reviews and scrutiny was layered into the approval process. Transactions generally needed to be risk reducing or collateralized in order to be approved.

In response to Lehman's bankruptcy filing on September 17, 2008 and their default under the ISDA Master Agreement executed by Lehman and FPL, EMT terminated the master agreement and its hedging transactions with Lehman on that date and replaced those

Hedging Audit 2009 - Docket No. 090001 Audit Request No. 6, Part 2(a)

C: Please reconcile and provide the supporting documentation for the differences occurred between the filling and the Derivative Sellement for these months:

Natural Gas -Heavy Fuel Of

A: As discussed in the response to audit request no. 4, part 1, Lehman Brothers Commodity Services, Inc. (Lehman) declared bankruptcy on September 17, 2008 and became a defaulting party under the ISDA Master Agreement executed by Lehman and FPL. FPL terminated its hedging deals with Lehman on that date and replaced those volumes with transactions executed with other counterparties. Additionally, FPL calculated an early termination settlement estimate in accordance with the terms of the ISDA Master Agreement. That amount is detailed in the response to audit request no. 6, part 1. Originally, FPL believed that a settlement could occur by year-end 2008.

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4 Legal and financial issues related to the Lehman bankruptcy had not been finalized by year-end 2008. Therefore, FPL recalculated the total early termination value, applying an time from September 17, 2008 to December 31, 2008 in accordance with the ISDA Master Agreement. That amount is detailed in the response to audit request no. 8; part 1. At that time, year-end 2008; FPL believed a settlement would likely occur during the first quarter of 2009, and that the value, with interest, would be approximately the same as the calculated forward market value of all Lehman transactions in September 2008.

In January 2009 FPL began to calculate Interestion a monthly basis, but continued recording amounts on a quarterly basis. The Company was unsure about the limiting of a settlement, so a determination was made to accrue interest unit a sattlement was spreed upon. FPL had provided Lehman with additional communications during the guarter, and believed a timely settlement was reasonable. FPL still believed the intel eventual settlement value, with interest, would approximate the same amount as the forward market value of all Lehmen transactions calculated in September 2008. In addition, since the 2009 projections included Lehmen mark-tomarket figures, interest values were adjusted to exclude amounts included in the projections. Any interest that exceeded the forward market value, with the adjustment for 2009 projection amounts, was account saparately.

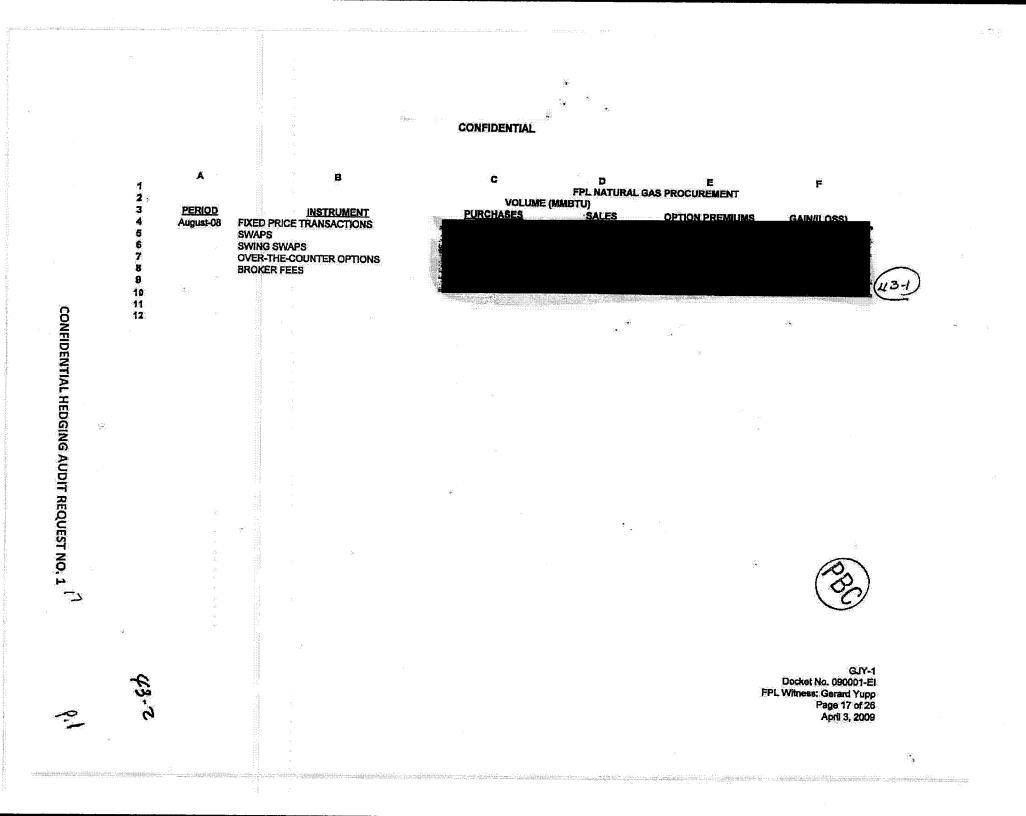
By the end of the first quarter 2009 legal and financial issues related to the Lehman bankruptcy had not been finalized, so a quarterly interest adjustement, up to the forward market value, was recorded for the period. The calculations related to the interest amounts and the forward market value are included below. The January interest amount of Capped by the total forward market value amount of

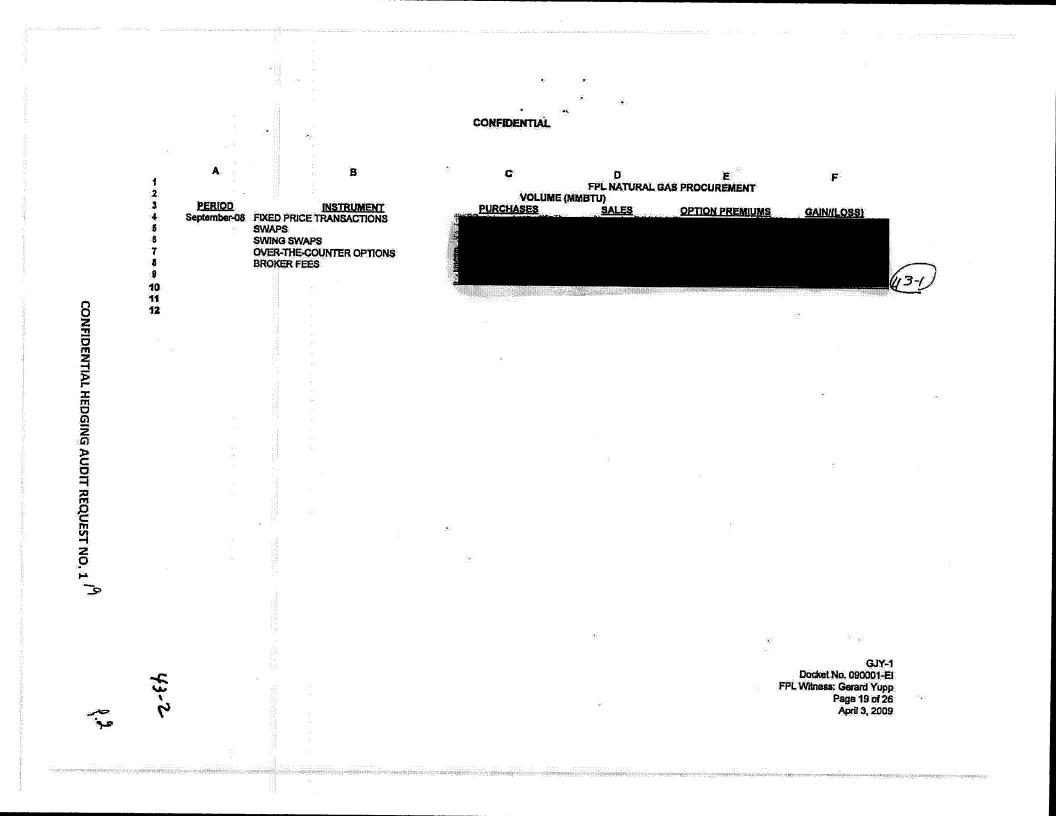
Legal and financial issues related to the Lehman bankruptcy had not been finalized by the end of second quarter 2009. At the end of June 2009, FPL recorded a quarterly interest adjustment in the amount of Due to the accounting closing process, this amount was not reflected in the hedging results activity in June, but rather was charged to incramental Hedging. The entry was corrected in July 2009 and was included in the January 2008 - July 2009 Hedging Activity results. This amount is detailed below in the column titled Accumulated Interest (in excess of Forward Mkt Value).

on Friday August 7, 2009 FPL made a settlement payment to Lehman for less than the total accumulated settlement estimate for these transactions. The payment of represents the discounted forward mark to market early termination amount of calculated for September 2008

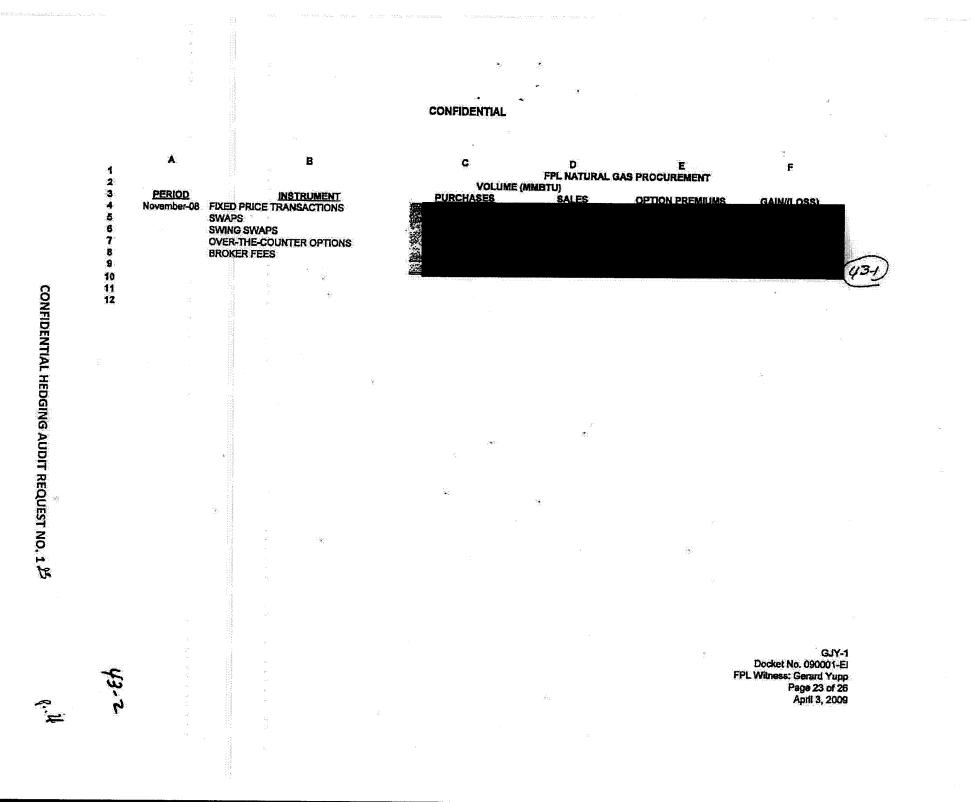
Adjustments to the total accumulated settlement amount and hedging results will be made in August 2009 to reflect this settlement value. However, the settlement has yet to be approved by the bankruptcy court. While additional adjustments are not anticipated at this time, huture adjustments may be necessary after final court approval.

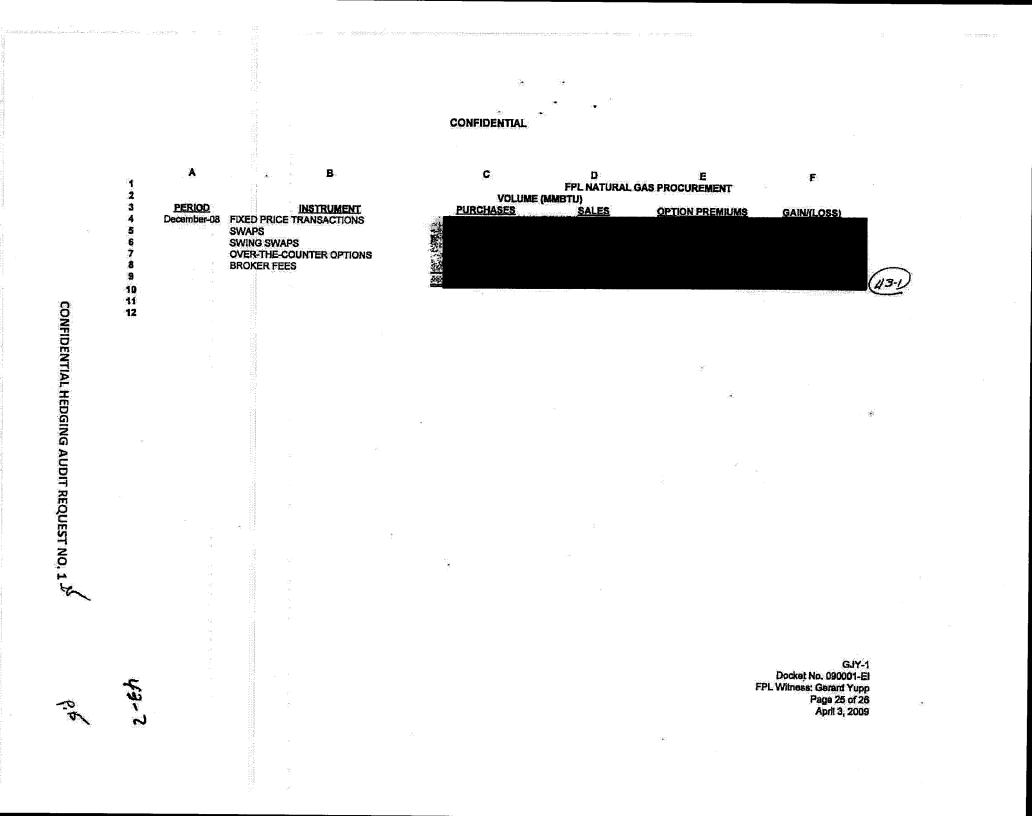
HEDGING AUDIT REQUEST NO. 6 Accumulated Interest Accumulated Interest -Forward market value of all Lehman transactions on September 17, 2008. (in excess of Forward Mkt Value **Projection Filing Total Interest** Total September 2008 discounted mark-to-market early termination settlement value 11 Total December 2008 adjustment included in results 12 January 2009 Interest 13 February 2009 Interest ษร Accumulated Interest amount included in the first quarter 2009 (January total plus February amount, up to fwd mtm) 14 March 2009 Interest 15 April 2009 interest 16 May 2009 Interest 17 June 2009 interes Accumulated Interest amount for the second quarter 2009 (included in July results) oher early bermination Estimate





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	1 2 3 4 5 6 7 8 9	A <u>PERIOD</u> October-08		B INSTRUMENT TRANSACTIONS PS OUNTER OPTIONS	C VOLUM PURCHASES	D FPL NATURAL G. E (MMBTU) <u>S</u> ALES	E AS PROCUREMENT	F GAIN/(LOSS)
CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1	10	7 13 年前:	م در					
يە تى ت	43-Z	4 				• •	C FPLV	GJY-1 Jocket No. 090001-El Vitness: Gerard Yupp Page 21 of 25 April 3, 2009







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INSTRUMENT FIXED PRICE TRANSACTIONS SWAPS SWING SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES

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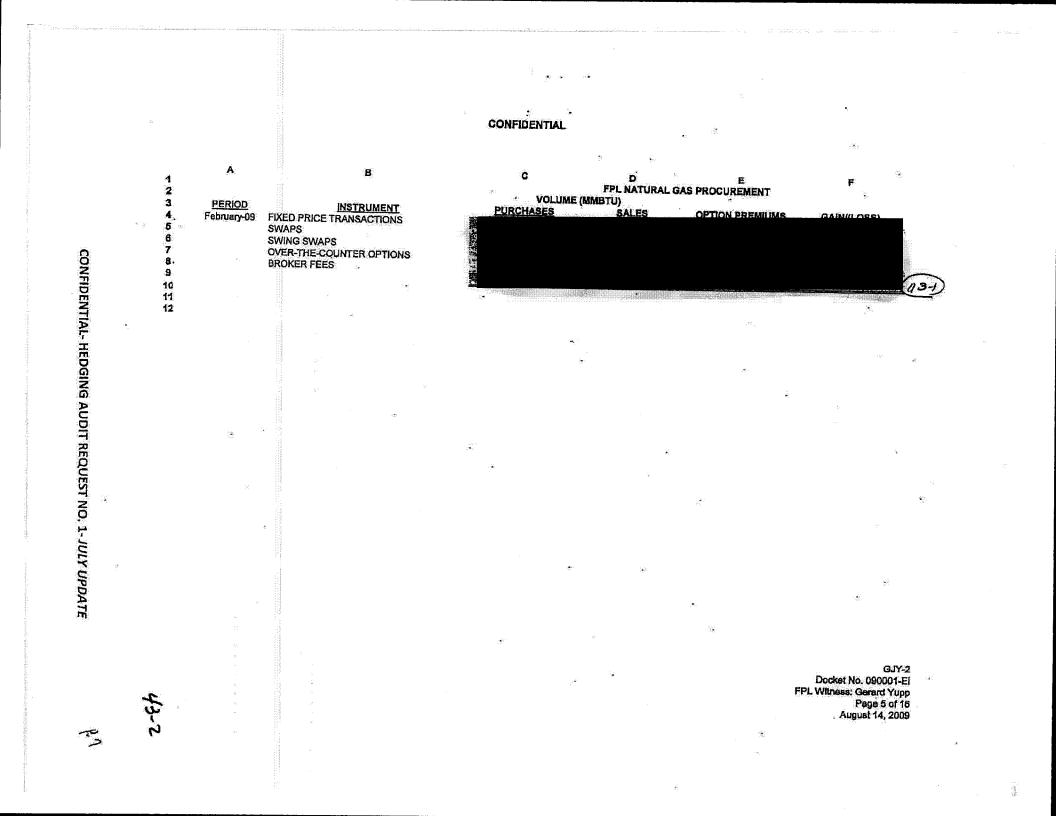
D FPL NATURAL GAS PROCUREMENT VOLUME (MMBTU) <u>PURCHASES</u> F OPTION PREMILIMS GAIN//I OPP (878) 108

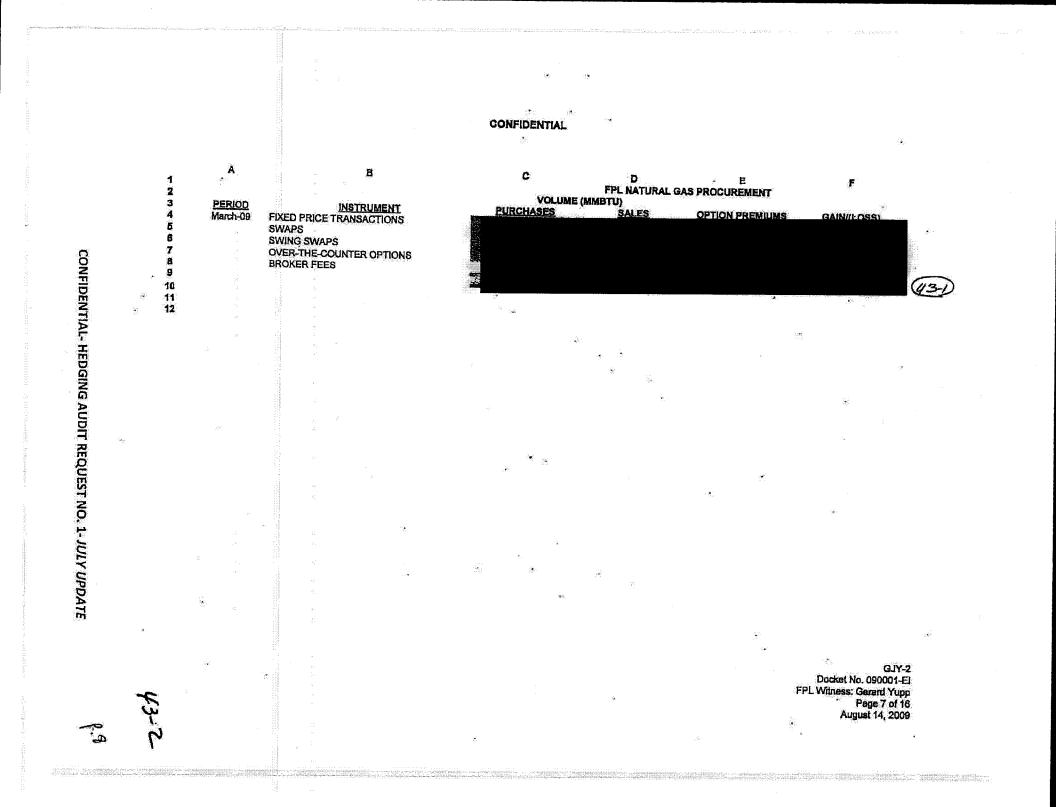
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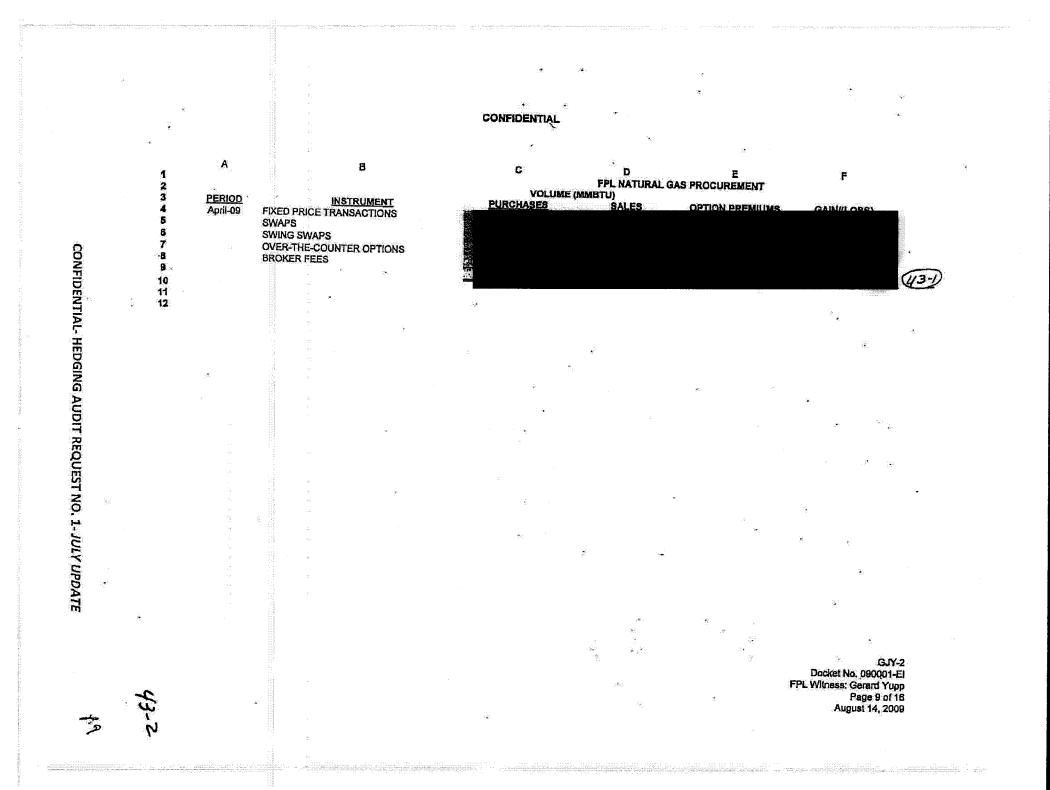
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GJY-2 Docket No. 090001-EI FPL Witness: Gerard Yupp Page 3 of 16 August 14, 2009

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18 CONFIDENTIAL- HEDGING AUDIT REQUEST NO. 1- JULY UPDATE

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INSTRUMENT FIXED PRICE TRANSACTIONS SWAPS SWING SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES PERIOD May-09

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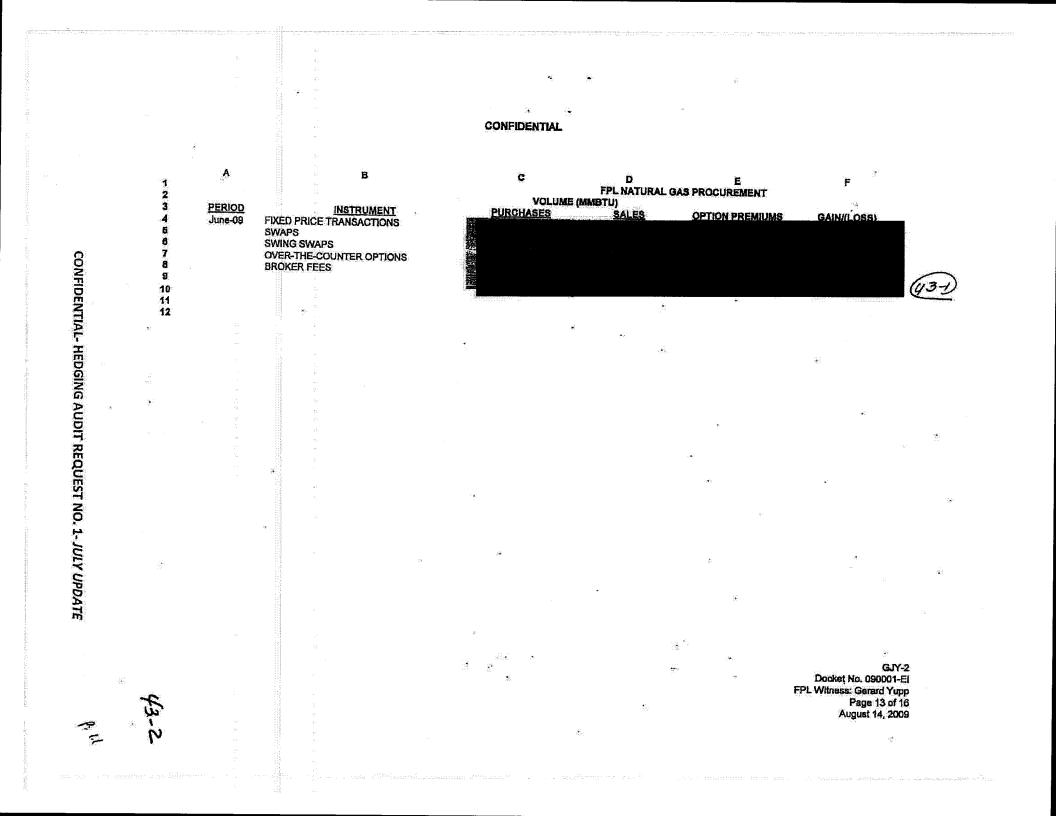
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D E FPL NATURAL GAS PROCUREMENT VOLUME (MMBTU) PURCHASES SALES OPTION PREMIUMS GAIN/(LOSS) 13 ÷

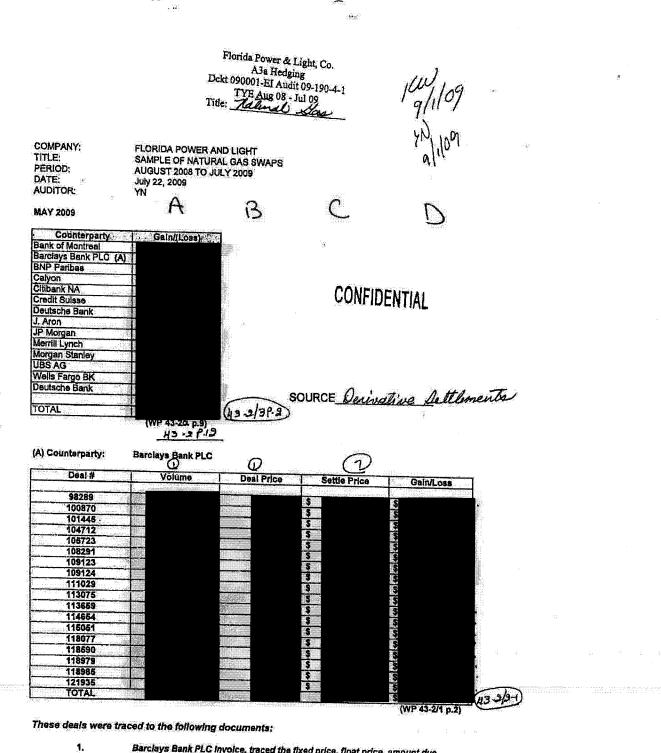
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GJY-2 Docket No. 090001-Ei FPL Witness: Gerard Yupp Page 11 of 16 August 14, 2009

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. CONFIDENTIAL D E FPL NATURAL GAS PROCUREMENT VOLUME (MMBTU) (SES Α В C 1 F 2 INSTRUMENT FIXED PRICE TRANSACTIONS SWAPS SWING SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES PERIOD July-09 3 SALES PURCHASES 4 OPTION PREMITIMS GAINU OCC 5 8 7 CONFIDENTIAL- HEDGING AUDIT REQUEST NO. 1- JULY UPDATE 8 9 10 11 12 43-1 त 13 -25 Ť GJY-2 Docket No. D90001-E1 FPL Witness: Gerard Yupp Page 15 of 16 August 14, 2009 ंश P.V



Barclays Bank PLC Involce, traced the fixed price, float price, amount due and quantity 43 -2-3

- FPL Invoice and coupon payment <u>4.9-5/5-1</u> Confirmation letters from Barclays Bank
- Swap Deal Entry
- Settlement Price Maintenance Form
 - Traced the Settle Price to the NYMEX futures contract settlement price

7. No errors were found.

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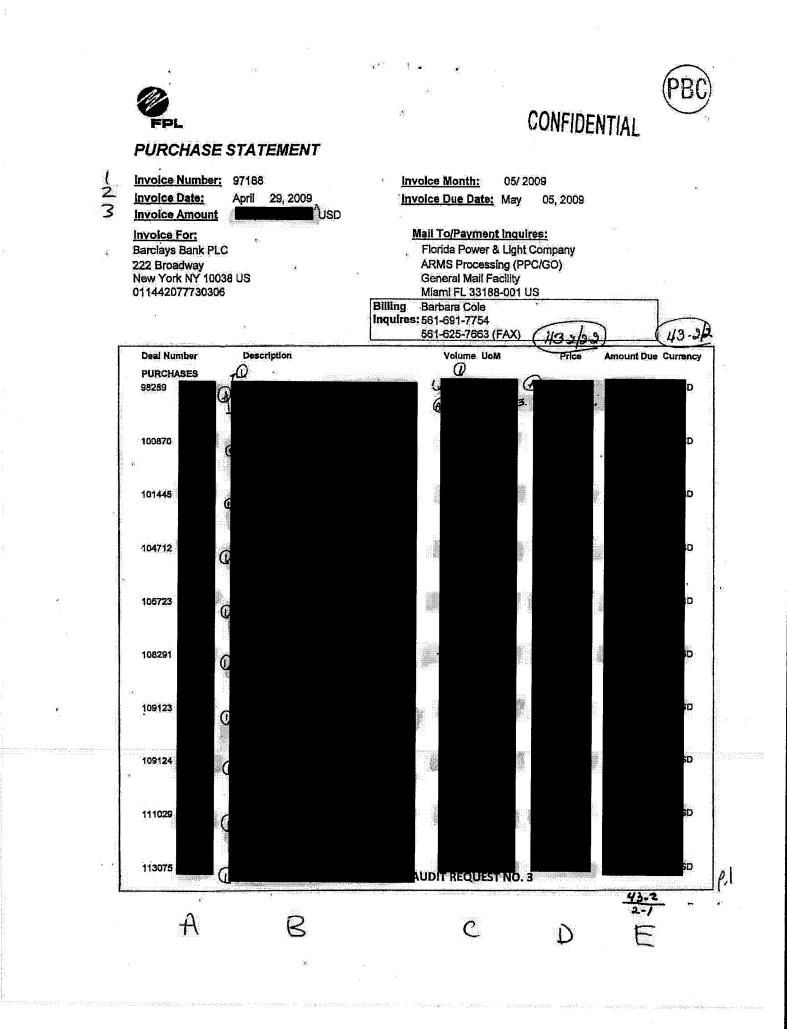
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REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 43-2/2

[Pages 1 through 9]

Derivative Settlements





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PURCHASE STATEMENT Invoice Number: 97188 05/2009 Involce Month: -23 involce Date: April 29, 2009 ^AUSD Invoice Amount A ß C D E B PURCHASES 113075 Û MBTU JSD 113659 0 114654 MBTU USD 0 JSD IMBTU 115051 0 JSD MBTU 118077 0 **AMBTU** บรอิ 118590 Ć имвти USD 118979 \mathbf{G} USD 118985 MBTU C USD AMBTU 121935 Ð USD 1 (PURCHASES) SUB TOTAL MMBTU MMBTU TOTAL USD 2 TOTAL Volume:

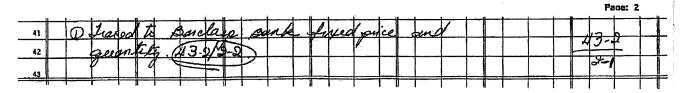
@ Laced to NYHEL: Senny Helb Tatural Future 4/98/2009. Has

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HEDGING AUDIT REQUEST NO. 3



12 12 Consepondence Ad Bardaya Capital 6 The North Coloran Caroury What Loralan £14 485 Energy Swaps, Options and Swaptions **H BARCLAYS** 234921 CAPITAL Invoice realize tratted on bahalf of Bardays Bank PLC Involce Details: Payment Details: Burdays will montres Customer Details: Fields Ponnir and Light Con 700 Universe Boolevard Yast Pelm Bouch 0905Y0422 water Nac DUE TO: Bendays Bunk PLC Bark Name : Fielda Mielda FL 22408 Energy Derivalves - Selfamer SWIFT: Sort Code: Aucourt 5 Accourt No: +44 (0)20 8184 8088 +44 (0)28 7778 1903 Berleys Sank PLD Windows inited Status Barbara Cols Cited and well 0015818917754 Payment due on or before: 05 May 2009 Felephone No. Paulotie Net 43-2 4400002142 Please bileren us tremertiately I Bile address or cordan 7-1-.T Figal/Finad H Amailine I galüement(UBD) ENERGY SWAPS · Quantity . Unit Floal Upread Flent G Fland F. Flow Type + Blatt C Gulat brid Pricing Index Trade A. y Deal B. Dael No -LEIDTU NATURAL BAS HENRY HUR 9611207 NYMEX NATURAL GAB HENRY HUB-0.0000 WINTU PERMIT Balling NYMEX NATURAL GASHENRY HUS-G 1000 MMETU -----Sellin NYMER NATURAL GAR-HENRY HUB MMOTU 0.0000 - CONFIDENTIAL 19293454 Battleon WHEX 0.00000 MMETU NATURAL GAR-HENRY HUR-10337983 NYNEX 8.9000 UTBMM NATURAL GAS HENRY HUB-10837087 Setti arres NYMEX 0.00999 UTEMM NATURAL GAS-HENRY HUB-1000019187 NYMEK 9.00090 MARYU NATURAL GAS HENRY HUS-NYMEX 10810462 8.00 0,900000 UTENN NATURAL BALLIENNY HUB-10501079 NYMEX MMBTU 0.00000 HATTINAL GAS-HENRY HUB-11102818 NYMEX NATURAL GAS HENRY HUS-MMETU 11198780 2 at Size NYMEX NATURAL GASHENRY HUS 0.00001 MINETU 11278891 NATURAL BAS HENRY HUS-MUSTU 0.00000 11325768 8etlam NYMEX MINISTU 0.0000 NATURAL GAS-HENRY HUB-11594642 attin. NYMEX MMBTU 0.000 NATURAL GAS-HENRY HUB-11171281 NYMEX NATIMAL GAS-HENRY HUS 0.0000 MANETU 11014641 2 a Minera and YANY NIMETU 0.00000 NATURAL GAS HENRY HUS 11020302 NYMEX UTBMM NATURAL GAS HENRY HUB 12197000 NUMEX Totali ENERGY SWAPS, OPTIONS AND SWAPTIONS TOTAL I payment la nEALIFERED. BY: the annual de Barbara ColeDA Cole DATE 440 Inscoverer 1 COMPANY CODE 1001 PHONE: 561-691-7754 AUTHORIZED BY REQUIRED IF UNDER \$2500 SAP DOCUMENT #(S): 5105020872 Melonie Ladd 5/4/09 Melanie Ladd 90 Menager, Power & Fuels Accounting ເຕ

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	NSES LESS RECEIPTS) FOR CL	JRRENT MONTH			4,610,245.68	s	
	OF FUEL) DURING CURRENT I FOR CURRENT MONTH [S/M						
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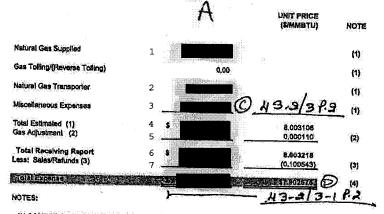
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FLORIDA POWER & LIGHT COMPANY NATURAL GAS PRICE COMPUTATIONS

May, 2009

TOTAL GAS USED DURING MONTH	MMBTU	CREDIT/REFUND ALLOCATION
Culler	<u>,</u>	126.175.5
Rviera	67,605	\$0,00
Putnem		(\$6,797.18)
Sanford	1,249,469	(\$125,824.77)
Pl Lauderdale	8,023,398	(\$808,892,73)
Port Everglades - Steam	3,091,813	(\$310,658.70)
	2,159,936	(\$217,165,33)
Laudardale/Pt Everglades GT	98,631	(\$9,715.53)
Cape Canaveral	1.402.781	(\$141,039,15)
Martin Bir 1 & 2	3,668,323	
furkey Point Units 1, 2 & 5	4,539,539	(\$370,833,32)
Aartin Units 3, 4 & 6	7,549,249	(\$458,418.73)
L Myers Units 2 & 3		(\$789,183.35)
Manalaa	6,548,352	(\$668,442.13)
Vest County	6,709,241	(\$674,554.08)
	327,361	(\$32,912.70)
CHARLENNETURE SALES AND	A 15 (15) (10)	(\$4,610,245.68)

ESTIMATED PAYMENTS FOR MONTH PLUS ADJUSTMENT



(1) SOURCE OF ESTIMATED PAYMENT IS THE MONTHLY GAS CLOSING REPORT FROM ENERGY MARKETING & TRADING. (2) ADJUSTMENT FROM THE GAS ADJUSTMENT MEMO FROM ENERGY MARKETING & TRADING. (3) SOURCE OF SALES/REFUNDS IS THE MONTLY GAS CLOSING REPORT FROM ENERGY MARKETING & TRADING. (4) UNIT PRICE COLUMN DOES NOT NECESSARILY ADD DUE TO ROUNDING.

Distribution:	

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M. Coller	EPM/J8
D. Dale	EMT/J8
D. Gussow	EMT/JB
M. Ladd	
	EMT/JB
9, Pairle	EMT/JB
M. Sullivan	PGD/JB
M. McAlica	PGD/J8

M. Kazadi D. Rodrigusz Y. Rosaria T. Conway S. Prince W. Jankina M. Acosta

RAD/GO RAD/GO RAD/GO ACG/JB ACG/GO ACG/GO RAD/GO

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CONFIDENTIAL HEDGING AUDIT REQUEST NO. 15

CONFIDENTIAL

COMPANY: FLORIDA POWER AND LIGHT TITLE: SAMPLE OF HEAVY OIL SWAPS PERIOD: AUGUST 2008 TO JULY 2009 DATE: July 22, 2009 AUDITOR: YN AUGUST 2008 July True-up August Estimate Counterparty Gain/(Loss) Gain/(Loss) Total **BNP** Paribas \$ 5 \$ Credit Suisse \$ \$ \$ Deutsche Bank \$ \$ \$ J. Aron S \$ \$ Morgan Stanley (A) 5 S \$ Total 43-31 \$ 43-3 \$ (WP 43-1/1-2 p.7) (43.3 59.6)

The actual gain of Morgan Stanley was selected for testing since J. Aron was tested in the prior audit.

(A) Counterparty: Morgan Stanley Capital Group, Inc.

Deal #	Volume	Deal Price	Settle Price	Gain/Loss
56375			\$	
58490		<u> </u>	\$	\$
54646			S S	\$
58709		<u> </u>	S	\$
59241			<u>Ф</u>	5
59870			3	\$
59966			0 0	\$
61068		••••••	<u>\$</u>	\$
65782			\$	\$
TOTAL			\$	\$
				\$ 43
		······································		(WP 43-3/1 p.4)

These actual deals were traced to the following documents;

- Invoices
 - Payment Coupons
- Swap Deal Entries
- **Confirmation Letters**
- Publication Printouts from the Company 5. 6.
 - Actual Platts Publication

No errors were found.

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SOURCE Derivative Settlements

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 43-3/2

[Page 1]

Derivative Settlements

FLORIDA POWER & LIGHT COMPANY M&S CORRECTIONS & ADJUSTMENTS WORK CHRG UNIT ORDER BLK LOC OF ER # COMP SEC UC CODE **M&S NUMBER** ISSUE QUANTITY AMOUNT DESCRIPTION A 143 45 0 611 104008 1 0 \$ L TO REFLECT A COST DECREASE TO HEAVY OIL . 151 00 0 975 104008 2 0 \$ INVENTORY FOR ALL FOSSIL PLANTS AS A RESULT .151 00 0 975 112001/ CONFIDENTIAL HEDGING AUDIT RECUIEST NO 3 0 \$ 1 OF FINANCIAL TRANSACTIONS FOR AUG 151 00 0 975 113007 4 0 S 2008 AS DESCRIBED IN ATTACHED MEMO 151 00 0 975 117002 5 0 FROM EMT. 151 00 0 975 118009 . \$ 4(12,718,905.03) 0 151 00 0 975 126001 \$ 4 (11,484,108.48) 0 See LEARS transaction register Attached behind to identify ALL transactions recorded to Account (H3-3/3-) 157,000 TOTALS A, - 6 2 . 7 $\mathcal{X}^{\mathcal{V}}$ Л X **59 CASH VOUCHER** APPROVED BY 6 DILHARA MARTIN MARTIN GARMENDIA SUPERVISOR, PROPERTY ANALYSIS DATE 9/3/2008 ACCOUNTING MONTH AUG I traced to account 151 (IFARS quel transaction Register). WP12 P.6to11 PMOL OOD A CO 2008 X-See approval Signature on 44 ast p.g.

CONFIDENTIAL

Hedging Audit 2009 – Docket No. 090001 Audit Request No. 1, Part 5



Q: Please provide a representation letter that describes in detail its accounting treatment for transaction cost associated with its financial hedging program.

A: Transaction costs associated with the hedging program are recorded in the month incurred. Accounting accrues these costs on the Gas Closing Report and the expense flows to the fuel clause through accounts 232.135 and 151.000 (the FPL Fuel Inventory account) directly. They are not included in the FPL Derivatives Settlements – All Instruments reports.

Each month EMT Accounting allocates the amount charged by ICE to the employees who are responsible for the hedging program. The ICE invoice is paid in the subsequent month. Newedge transaction fees are incurred to offset open positions when they are closed out. FPL has not incurred any Newedge transaction costs since 2008.

Currently, FPL's financial hedging program incurs transaction costs from Intercontinental Exchange, Inc. (ICE). ICE users are charged a

 for access to ICE North American Natural Gas, which includes the market types
 Financial Gas and Physical Gas, the second for ICE North American Power. Individual user traded commissions, if any, are netted against the individual monthly minimum commission regardless of the OTC market traded. Commission costs are

OTC (ICE) A

Aug-08 Sep-08 Oct-08 Nov-08 Dec-08 Jan-09 Feb-09 Mar-09 May-09 Jun-09 Jun-09 Jun-09 Jul-09 Total

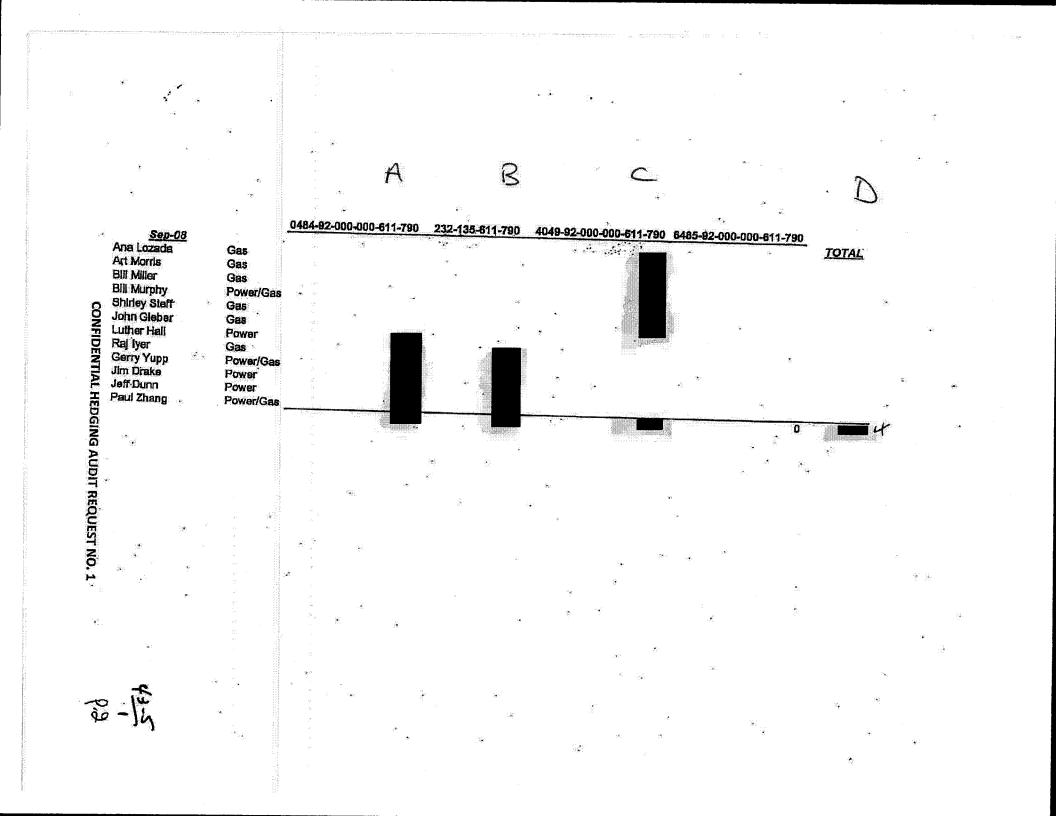
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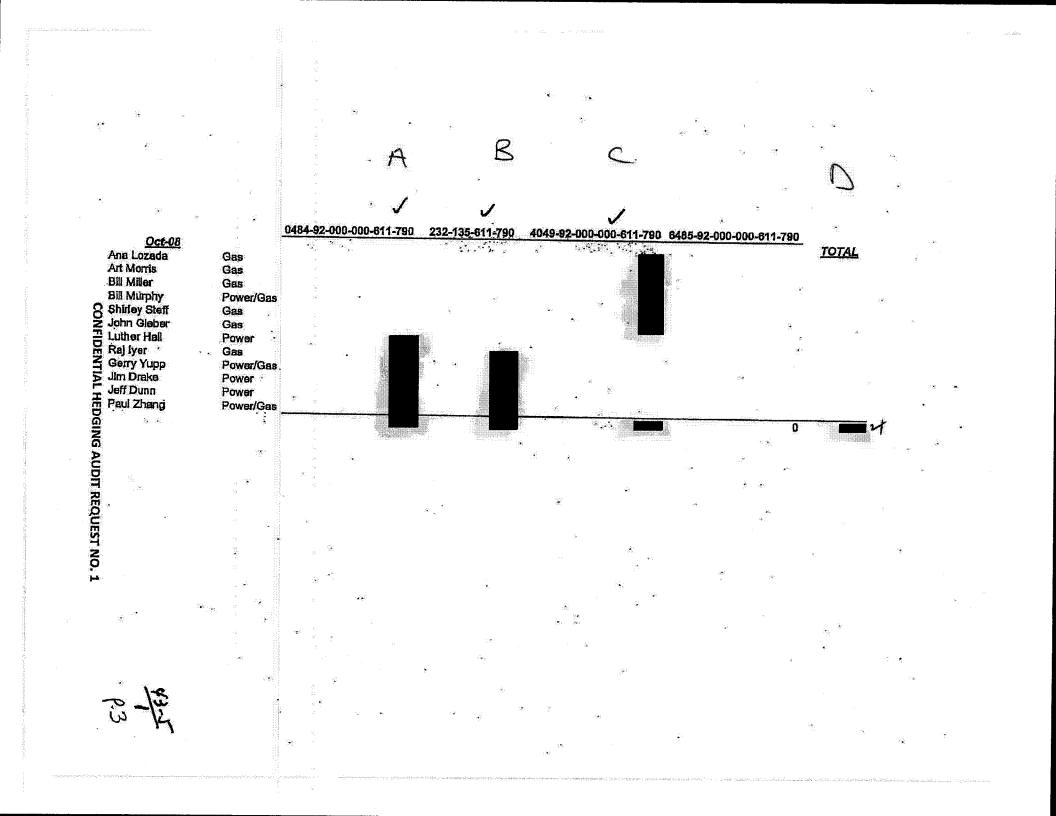
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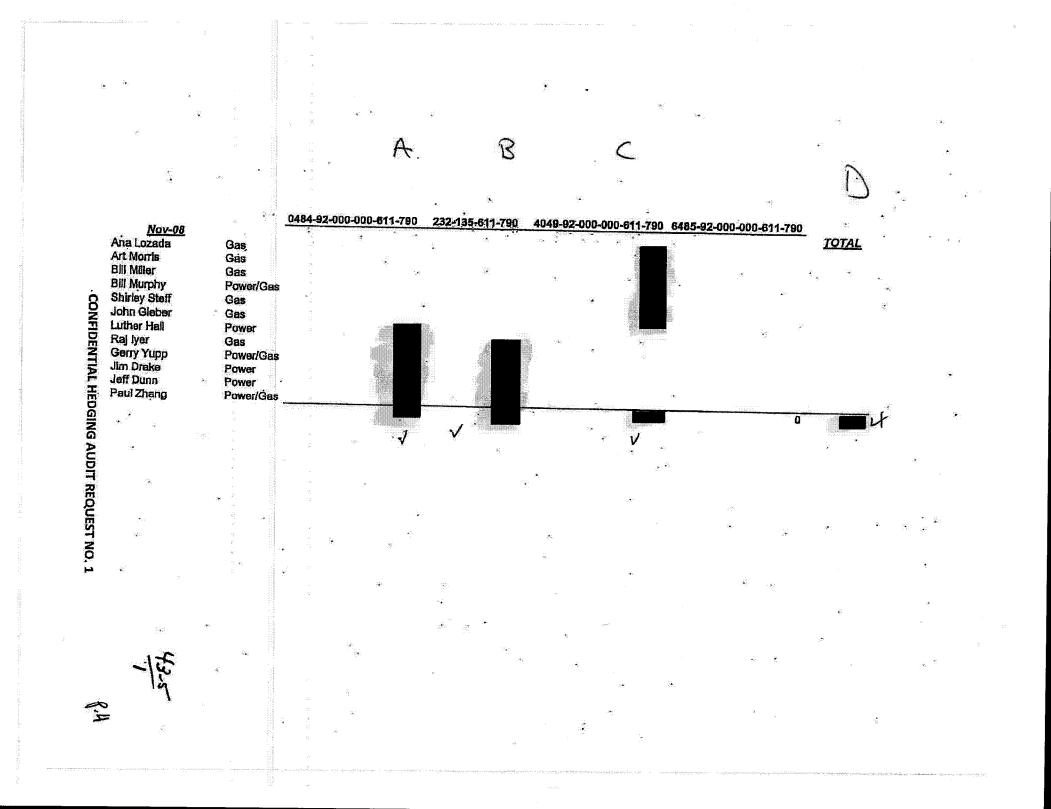
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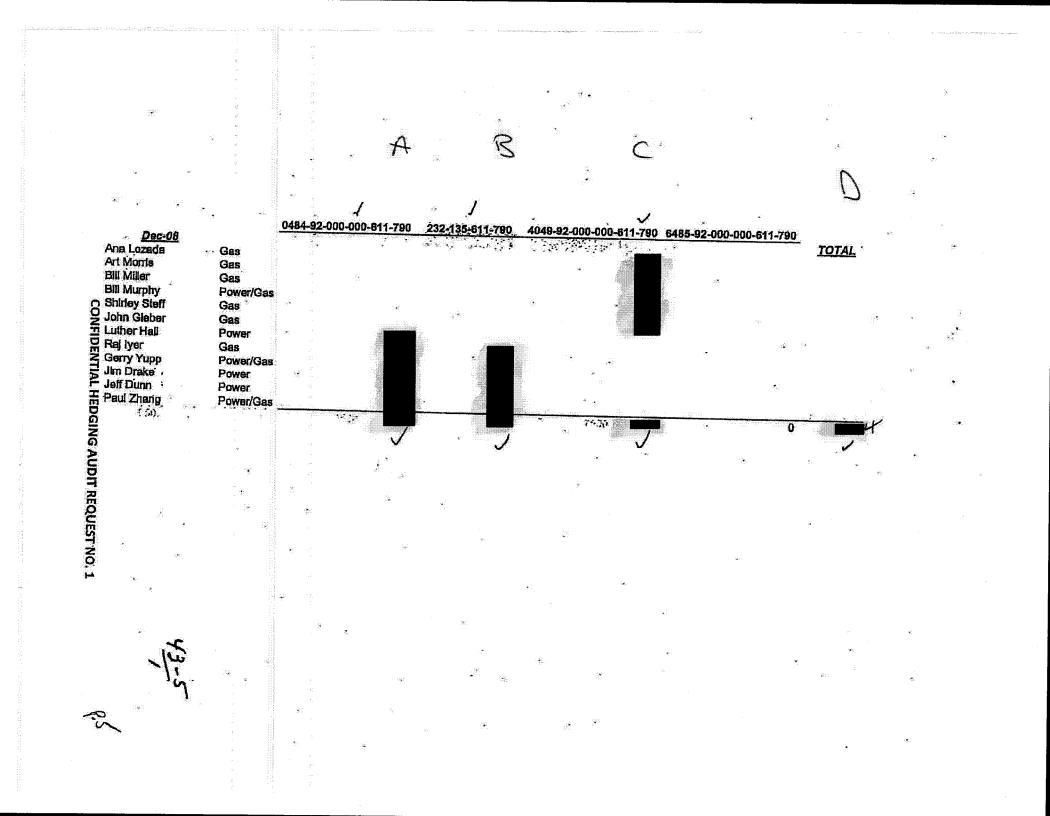
SOURCE DEC. REQ. #1

В A B 0484-92-000-000-811-790 2321354661127901 4049-92-000-000-611-790 6485-92-000-000-611-790 Au<u>d-08</u> Ana Lozada Gas TOTAL . Art Morris Gas 311 Miller 311 Muller 311 Murphy Gas Power/Gas Gas Gas Power Gas Power/Gas Power Power Power/Gas 0 Inared to ICE invoice. CONFIDENTIAL



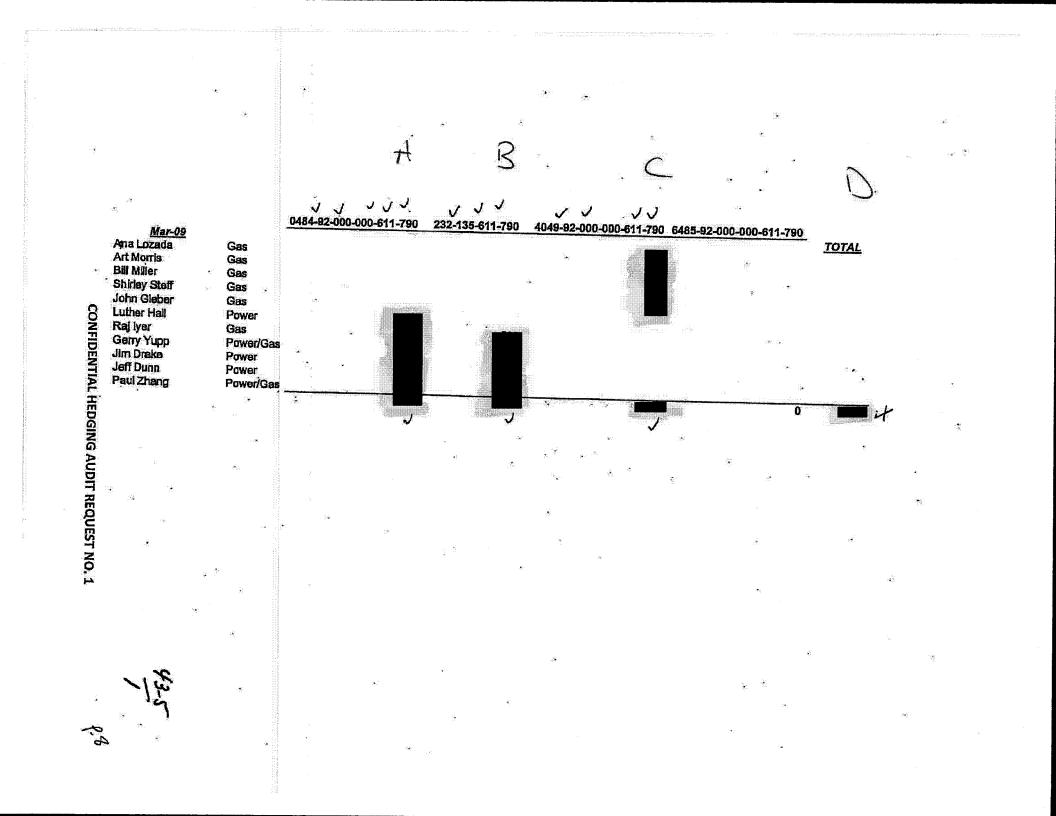


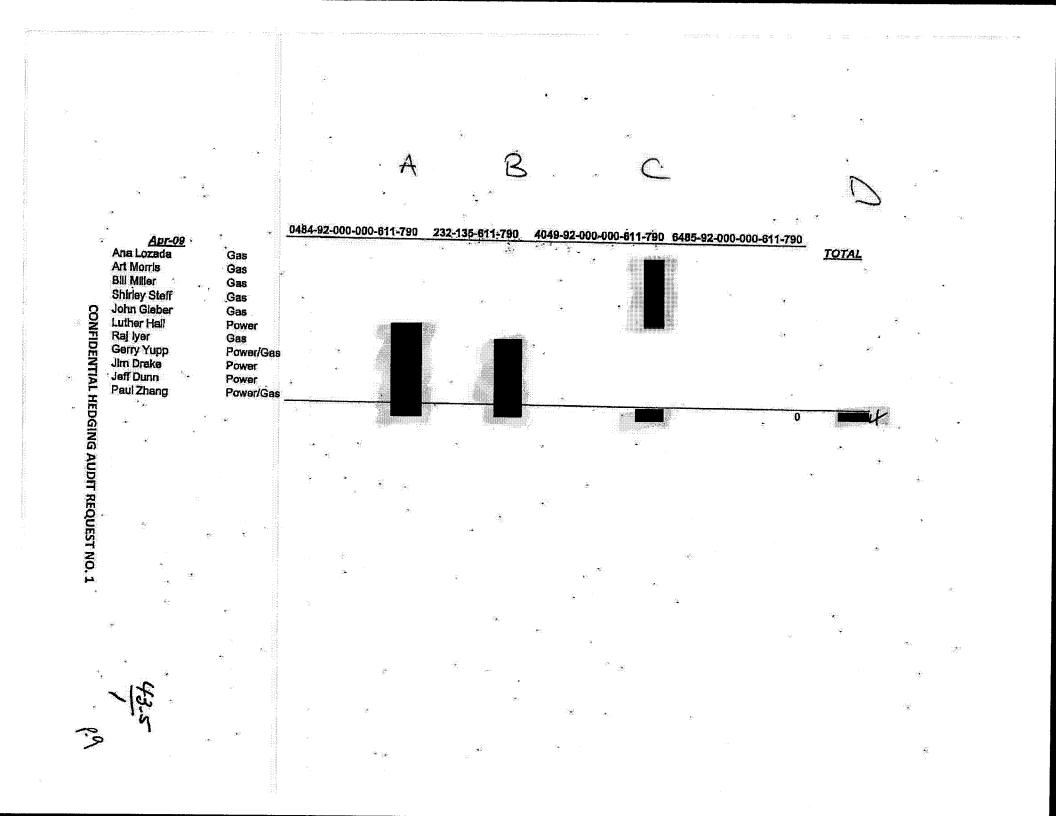


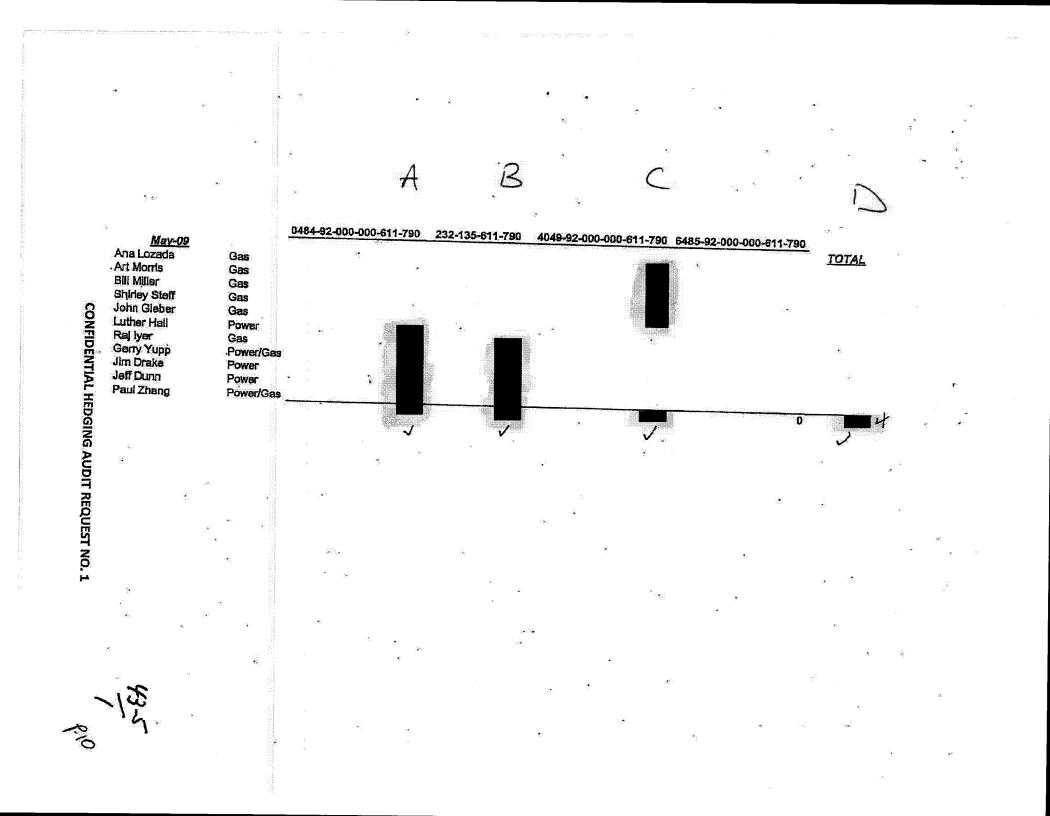


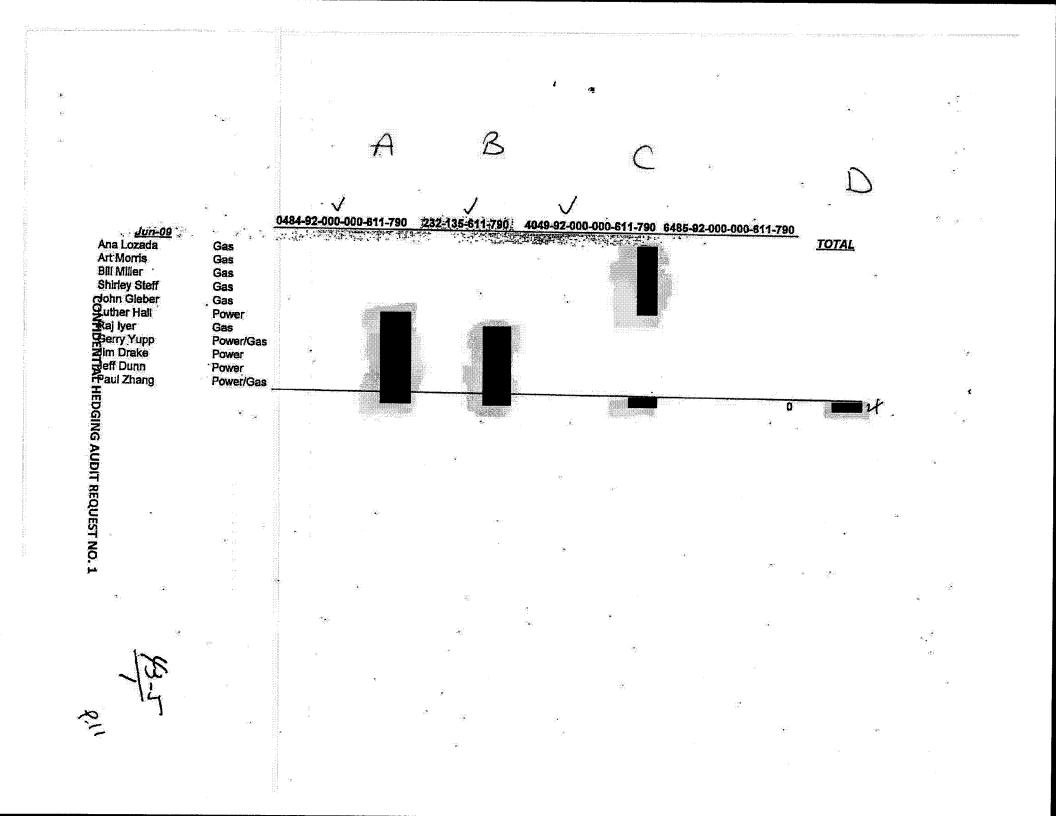
K **₈) 4.1 ्र ¥ . 0484-92-000-000-611-790 232-135-611-790 4049-92-000-000-611-790 6485-92-000-000-611-790 Jan-09 Ana Lozada Gas 1. TOTAL Art Morris Gas **BIII Miller** Gas 6 **Bill Murphy** 32 Power/Gas Shirley Steff Gas **CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1** . John Gleber Gas Luther Hell Power Raj lyer Gas Gerry Yupp Power/Gas Jim Drake Power Jeff Dunn Power Paul Zhang . Power/Gas 0 Bill Murphy removed as he needed access to Future Source Instead I saved to ICE invoice . 5

4049-92-000-000-611-790 8485-92-000-000-611-790 0484-92-000-000-611-790 11 J 1 232-135-611-790 <u>*</u> Feb-09 Feb-0 Ana Lozada Art Morris Bill Miller Shirley Steff John Gleber Luther Hall Raj Iyer Geny Yupp Jim Drake Jeff Dunn Paul Zhang Gas Gas Gas Gas TOTAL 19.00 Gas CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1 Power ' Gas Power/Gas Power Power Power/Gas 0 ¥2











Hedging Audit 2009 – Docket No. 090001 Audit Request No. 8

Q: Please provide:

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1. Authorization Limit for the VaR Summary. (May 2009)

Physical Hedging:

- 2. Where does the physical hedging recorded in the filing and in what account?
- 3. Provide the explanation for the Newedge Combined Monthly Statement (provided in DR 1 item # 7). How does this statement relate to the physical hedging?

 The daily NP M2M VaR Summary by Fwd Mkt Portfolio and Spot Month Exposure Reports for the month of May 2009 have been included

Currently, FPL's financial hedging program incurs transaction costs from both the Intercontinental Exchange, Inc. (ICE) and Newedge USA, LLC. Newedge transaction fees are incurred to offset open positions when they are closed out. Total commission charges of \$42.70 were incurred from Newedge USA, LLC. From August to November 2008. No additional transaction costs have been incurred from Newedge since that time. There is no relation between the Newedge statements and physical hedging because

P haved to new edge invoices.

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 8

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 43-6/1

[Pages 1 through 45]

Hedging Contracts

			Dcl	Florida Power & A3a Hedg kt 090001-EI Aud TYE Aug 08- E: <u>Journal</u>	ing lit 09-190-4-1 - Jul 09			CONFIDE	NTIAL	
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						(44-2/1)	(44-2/1)			
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	Reference	Salary	Payments	Allocation	Payroll	incentive	Earnings	Total		
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mployee 2	(44-2/3)		26	50%		*			1	
mployee 3	(44-2/4)		26	. 40%						
mployee 4	(44-2/5)	A SA EL	26	30%	Same and	and the second second		0	1	
nployee 5	(44-2/6)		26		n - 1	C CTUCHLA				
mployee 6	(44-2/7)		26	57%					1	
mployee 7	(44-2/9)	State Property	26	1 20%	the state of the s	- Addressed				
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DR#4

WP 44-2 P.1

Payroll.xls

Florida Power & Light, Co. A3a Hedging Dckt 090001-EI Audit 09-190-4-1 TYE Aug 08-Jul 09 Title: ________

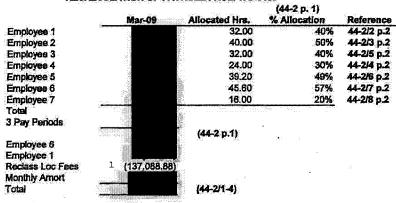
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RECALCULATION OF PAYROLL FROM WO 6485

Source: WO 6485 (44-2/1-4)

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B. J. C.-M

March 2009 Payall

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CONFIDENTIAL HEDGING AUDIT REQUEST NO. 7

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Hedging Audit Workpaper Number 44-2/12

[Pages 1 through 8]

Hedging Audit Workpaper Number 44-2/13

[Pages 1 through 4]

Hedging Audit Workpaper Number 44-2/14

[Pages 1 through 6]

Hedging Audit Workpaper Number 44-2/15

[Page 1]

Florida Power & Light, Co. A3a Hedging Dckt 090001-EI Audit 09-190-4-1 TYE Aug 08 - Jul 09 Title: <u>Jummary of Echector</u> 402 p3/0)

WP 45

FPL's hedge percentages are calculated by dividing the projected burn volumes by the amount/volume of fuel hedged for each month. These calculations are based on the last fuel burn projections that are developed and reviewed prior to the relevant period. The current hedging volumes are then evaluated to determine if they are in compliance with the approved Planned Position Strategy (PPS) (45-2/1 to 4) that was developed to address rebalancing activities (45-3/3).

The purpose of the rebalancing program is to maintain the monthly fuel burned and the volumetric hedges noted in the Hedge rarget table included as part of the (PPS)). The program includes a monthly analysis of the projected heavy and natural gas fuel burns projected by Gentrader Study (45-3/1-1/1). If the volumes hedged for either fuel of a particular month do not reach the established targets, the rebalancing transactions would be implemented for the appropriate period.

The rebalancing of the heavy oil and natural gas for the the months of August 2008 to July 2009 were recalculated by using the schedules provided by the company. The rebalancing of the heavy oil was within the required **1999** (45-3/1), while the 3/2) which were prevented to the replaced of the natural gas did not meet the required **1999** (45-3/1), while the 3/2) which were prevented to the natural gas did not meet the required **1999** (45-3/1), while the 3/2) which were prevented to the natural gas did not meet the required **1999** (45-3/1).

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3/2), which were properly explained by the company (45-3/2-3).

WP 45.doc

Hedging Audit 2009 - Docket No. 090001 Audit Request No. 3, Part 5 - July Update II

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		NATUR	AL GAS	HEAVY FUEL OIL				
	Actual (A3) MMBtus	Actual (A3) Dollars	Hedged MMBtus	Hedged Dollars	Actual (A3) Bbis	Actual (A3) Dollars	Hedged Bbis	Hedged
and the second second			A	B.	and a second		C	D
August-08	48,749,735	\$488,285,341			1,225,798	\$79,190,475		<u> </u>
September-08	42,506,399	\$458,478,100			1,610,456	\$104,269,550		
October-08	41,284,141	\$375,518,895			597,304	\$37,470,351		
November-08	31,604,671	\$287,968,425			210,407	\$13.324.853		
December-08	27,444,316	\$262,969,625			62,584	\$3,874,213		
January-09	30,134,060	\$298,137,410			171,203	\$10,745,280		
February-09	28,250,885	\$256.532.020			327,372	\$20,593,082		
March-09	34,612,821	\$296,363,834			188,397	\$12,026,891		
April-09	39,943,759	\$326,018,200			579,796	Automotion a constraint activity of		
May-09	45,531,032	\$359,853,642			947,534	\$35,906,174		
June-09	46,471,180	\$368,945,306				\$60,218,345		
- A RELIGIV, OS	49,415,203	\$381,974,109			1,057,078	\$68,408,944 \$72,181,801		

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Note: Hedge volumes are based upon projected fuel burns. Note: Hedge dollars represent a calculated notional value (strike price * volume purchased/sold) 1 Note: The 2008 and 2009 hedging programs

Dec calculation of rebalancing on wP15-2

Florida Power & Light, Co. A3a Hedging Dekt 090001-EI Audit 09-190-4-1 TYE Aug 08 - hil 09 Title: <u>Recalculation of</u> 3 Heate is . Saget Heate

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Month		<u> </u>	tural Gas	NOTE	Heavy Oil: Nore					
	Hedge Dollar	Actual Dollars	% Hedge	Target Hedge	Difference	Hedge Dollar	Actual Dollars	% Hedge	PPS	Difference
	A		В	[C	D	E		म	G	Н
August-08		488,285,341		0001			79,190,475			(<u> </u>
September-08		458,478,100					104,269,550			
October-08		375,518,895				-	37,470,351		<u></u>	
November-08		287,968,425		·····	*					<u> </u>
ecember-08		262,969,625		r •···-		-2-	13,324,853			<u></u>
lanuary-09	-	298,137,410	~~			 	3,874,213			ļ
ebruary-09		256,532,020			·}	H	20,593,082			<u></u>
farch-09		296,363,834					12,026,891	·• · ·		<u> </u>
pril-09		326,018,200					35,906,174			
lay-09		359,853,642					60,218,345			
une-09		368,945,306					68,408,944		·····	
uly-09		381,974,109		·····			72,181,801			

(45-2/2). (45-2/2).

Note:

Source:

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¹ Rebalance for

2 Rebalance for

WP 45-1 p.1

This schedule showed the months that. required rebulancing. See WP 45-3/1-1 for the heavy ail rebalancing ; WP 45-3/2 for natural gas rebalancing. The rebalancing, which is executed by purchasing on selling swaps, is to maintown the 90 hodge whin the PPS (15-5/1 target hedge .

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Hedging Audit Workpaper Number 45-2/1

[Pages 1 through 2]

Hedging Audit Workpaper Number 45-2/1-1

[Pages 1 through 2]

Hedging Audit Workpaper Number 45-2/1-2

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/2

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/2-1

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/2-2

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/2-3

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/2-4

[Pages 1 through 2]

Hedging Audit Workpaper Number 45-2/3

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/3-1

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/3-2

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/3-3

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Hedging Audit Workpaper Number 45-2/3-4

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/4

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/4-1

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/4-2

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-2/4-3

[Pages 1 through 3]

Hedging Audit 2009 – Docket 090001 Audit Request No. 5, Part 2

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Q: Please provide the changes that were made for all the revised PPS.

A: The original 2008 and 2009 hedging and rebalancing PPS documents incorporated the latest commodity prices, hedge targets and load forecasts available at the time. However, as business and market conditions change during the hedging period, load forecasts, hedging targets and commodity prices are often updated. EMT revises the PPS documents to reflect these updates.

Planned Position Strategy (PPS) Name

HDGE10045B

HDGE10045B-Revision No. 1

HDGE10045B-Revision No. 2

HDGE10046B

HDGE10046B-Revision No. 1

HDGE10046B-Revision No. 2

HDGE10046B-Revision No. 3

HDGE10046B-Revision No. 4

Original 2008 Hedging PPS

Description of Revision

Modified language below Table 2 indicating ("The targets outlined in Table 1 above are EMT's interim hedge targets total 2008 target hedge percentage will be finalized."

Modified percentage targets in Table 1, added a price floor table associated with Table 2, modified language below Table 2

Original 2008 Rebalancing PPS

Updated pricing tables to reflect current market prices

Updated the heavy oil fixed price execution limits for the 2008 rebalancing program, to reflect current market conditions



Updated pricing tables to reflect current market prices

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HDGE10047B

HDGE10047B-Revision No. 1

HDGE10047B-Revision No. 2

HDGE10047B-Revision No. 3

HDGE10047B-Revision No. 4

HDGE10048B

HDGE10048B-Revision No. 1

HDGE10048B-Revision No. 2

HDGE10048B-Revision No. 3

Original 2009 Hedging PPS

Updated volume targets in Table 1 and updated execution prices in Table 2 to reflect current market prices

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Updated pricing tables to reflect current (market prices

Updated heavy fuel oil pricing tables to reflect current market prices

Requested approval to update 2009 initial hedge volumes monthly and updated pricing tables to reflect current market prices

Original 2009 Rebalancing PPS

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Updated pricing tables to reflect current market prices

Updated pricing tables to reflect current market prices

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Hedging Audit 2009 – Docket No. 090001 Audit Request No. 5, Part 1

Q: Please provide explanation and supporting documentation for the calculation of the rebalance trades of the heavy oil and natural gas.

A: The 2008 hedging rebalancing program included a weekly analysis of projected heavy oil and natural gas fuel burns. If a particular weekly projection indicated the volumes hedged for either fuel would be outside of targets established by the program, rebalancing transactions would be executed for the appropriate period.

The 2008 heavy oil and natural gas rebalancing activity is summarized in the tables included as part of this response. The hedge percentages are based upon projected fuel volumes, which are determined by GenTrader studies. EMT's approved rebalancing plan was to maintain monthly volumetric hedges

HDGE10046B, with revisions. These targets were applicable during the rebalancing phase of the program, which began in September 2007. The 2008 heavy oil hedge positions and natural gas positions met approved program targets throughout the period.

The 2009 hedging rebalancing program includes a monthly analysis of projected heavy oil and natural gas fuel burns. The first GenTrader study of each month is used to determine any rebalancing requirements. If a particular monthly projection indicates the volumes hedged for either fuel will be outside of targets established by the program, rebalancing transactions are executed for the appropriate period.

The 2009 heavy oil and natural gas rebalancing activity is summarized in the tables included as part of this response. The hedge percentages are based upon projected fuel volumes, which are determined by GenTrader studies. EMT's approved rebalancing plan was to maintain monthly volumetric hedges

hoted in the Hedge Target table included as part of PPS HDGE10048B, with revisions. These targets were applicable during the rebalancing phase of the program, which began in July 2008. The 2009 heavy oil hedge positions and natural gas positions met approved program targets throughout the period.

Four sets of tables, one each for 2008 natural gas, 2009 natural gas, 2008 heavy oil, and 2009 heavy oil, have been included as part of this response. Table one includes the rebalancing transactions, as previously provided in the response to audit request no. 3, part 7. Table two shows the analysis date which indicated projected hedge volumes would be outside of the established tolerance bands. The GenTrader volumetric projections and actual hedge volumes are included in tables two and three. Table four summarizes the projected hedge percentages before rebalancing activity. Table five shows the rebalancing volumes, along with the direction of the transaction (purchase/sale). Table six summarizes the projected hedge percentages after rebalancing trades were complete.

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Hedging Audit Workpaper Number 45-3/1

[Page 1]

Hedging Audit Workpaper Number 45-3/2

[Page 1]

Hedging Audit Workpaper Number 45-3/2-1

[Pages 1 through 3]

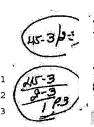
Hedging Audit Workpaper Number 45-3/2-2

[Pages 1 through 3]

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Hedging Audit 2009 – Docket No. 090001 Audit Request No. 9, Part 3

Q: Per Doc. Req. #5, item #1, please explain why there were no natu(r)al gas rebalancing for the Bank of Montreal and DB (Attachment 2).



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Bank of Montreal

A:

The spreadsheet printout provided in response to hedging andit request no. 5, part 1 related to 2008 natural gas rebalancing activity included an erroneous calculation in the "Rebalance Activity" section. The cell formula indicated "0" mmbtus were sold for 45 - 3/2 - 1. December 2008, whereas the rebalancing activities. The volume of the rebalance Activity approximately sold as part of the rebalancing activities.

audit request no. 3, part 7 is correct, and should have been reflected in the "Rebalance Activity" and "Hedge Percentage After Rebalance" calculations.

As of November 17, 2008, GenTrader projected natural gas burns of **March** immbus during December 2008. FPL had hedged **March** in that time. This hedged volume translated to a hedged **March** The hedged **March** is a state of the state of the

after that transaction was completed. An updated spreadsheet printout has $\frac{45-3}{9-3}$

been included as part of this response.

<u>DB</u>

hedged

As of December 1, 2008, GenTrader projected natural gas burns of mmbtus during May 2009. FPL had hedged at that time. This hedged volume translated to a hedged ^AThe hedged percentage target was To bring the hedged percentage two rebalancing transactions, each for were executed. Two transactions, each for were financially sold to Deutsche Bank (DB). The two transactions, which occurred on are noted above the "Total of Transactions" line on the spreadsheet printout provided in response to hedging audit request no. 5, part 1. The hedged percentage for after those transactions were completed.

³ CONFIDENTIAL- HEDGING AUDIT REQUEST NO. 9

Hedging Audit Workpaper Number 45-3/2-3/1

[Pages 1 through 3]

Hedging Audit Workpaper Number 45-3/3-1

[Pages 1 through 2]

Rebalancing



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Hedging Audit 2009 – Docket No. 090001 Audit Request No. 14, Part 4

Q: Please provide:

4. Fuel Burning Summary, please explain the calculation of the Grossed Up MMBTU.

A:

FPL's transportation agreements include provisions that allow the operators of FGT and GS (FGT=Florida Gas Transmission Company, GS=Gulfstream Natural Gas System) to retain natural gas fuel without paying for it. This natural gas is consumed by the pipeline as fuel to run the facilities. The FGT and GS amounts noted in the second and third columns on the Fuel Burn Summary reports provided in response to hedging audit request no. 10, part 3, were grossed up, as noted in columns to the right, to include the then-current fuel rates for each pipeline. The fuel rate applicable to natural gas amounts delivered on GS for both 11/17/2008 and 11/24/2008 reports was 1.36%. The fuel rate applicable to natural gas amounts delivered on FGT for both 11/17/2008 and 11/24/2008 reports was 1.36%. The fuel rate applicable to natural gas amounts delivered on FGT for both 11/17/2008 and 11/24/2008 reports was 3.22%. For example, for the fuel rate of the fuel rate of the fuel rate of the delivered on the FGT system. [calculation =

W5-3/3-2/1

CONFIDENTIAL- HEDGING AUDIT REQUEST NO. 14

Notice 1921163

Notice ID: 1921163	Notice Type: Other	Post Date/Post Time: 06/02/2008 13:27:18 CDT
N	Post Expiration Date/Time: 06/01/2009 00:00:00 CDT	Notice Status: Initiate
Prior Notice ID: 0	Notice Eff Date/Eff Time: 06/02/2008 13:27:18 CDT	Notice End Date/End Time: 06/01/2009 00:00:00 CDT
Rsp Date/Rsp Time:	Reqrd Rsp: NONE - DEFAULT	

June 2, 2008

To: Gulfstream Natural Gas System, L.L.C. Customers, Shippers, and Operators

Re: Notice of Change of Transporter's Fuel Use

The Commission approved Guifstream's Transporter's Use Percentage (TUP). Effective June 1, 2008 the TUP will be increased from 1.33% to 1.36%.) 41-3/3-2

If you need further information, please call Stacey Woolcock at 713-215-3443.

1.0138 13-= 1.0138® (P) the TUP of Dec. 2008 was recalculated using the information in the Fuel Bern summary (45-3/3-1). The difference was .000 + 70. Since the difference is nominal - not hedging related, no guither work way done. 9/15/2009 http://www.1line.gulfstreamgas.com/11.ine/wgp/download?delvid=1921163&hfNoticeFlag=Y&hfDownl... CONFIDENTIAL- HEDGING AUDIT REQUEST NO. 14 (1/4 41 mr A

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 46-1

[Page 1]

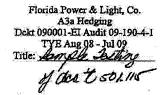
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REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 46-1/1

[Pages 1 through 35]

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200903	501.115	0	611		PY	36000	820		
200905	501.115	0	611	60,706.00	CV	51450	741	PCI-1/14/09 #8663-REPOWER COSTS INC 5000067351	Annual license fee for GenTrader for the period from January 16, 2009 to January 15, 2010 (Software License and General Consulting Agreement).
200901	501.115	0	611	119,488.31	CV	52450	767	LOC Fees 4th qtr'08 CITIBANK N A	Location of Credit fees for the 4th quarter.
200901	501.115	0	611	17,485.57	CV	52450		Aug-Sept'08 LOC feesTHE BANK OF NOVA SCO1900001303	Location of Credit fees for the months of August & September 2008.
200901	501.115	0	611	795	CV	52450		Dec conferenc-BrinisGREGG ENGINEERING SE1900003366	Gregg Engineer Pipeline Conference.
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Percentage	of Sample	Testing							

SOURCE DAHS

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Account 501115.xls

WP 47-1

Hedging Audit 2009 - Docket No. 090001 Audit Request No. 9, Part 2

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Q: For items 8 & 9, please provide who were the incentive and the retention bonus for. (Attachment 1)

A (8): The 2009 budget calculation incorporated personnel in the Financial Trading and Risk Analytics groups that were allocating time to the enhanced hedging program. The total estimated incentive amount is accrued over the entire calendar year, in twelve equal amounts. The incentive amount identified in Attachment 1 represents the January 2009 accrual, which was one of twelve identical accrual amounts that will be recorded during 2009. Incentives are payable the following year. The total amount accrued during 2009 will be reversed when payments are made in 2010. Incentive payments are a component of total payroll expenses. These payroll amounts, in proportion to the base payroll amounts being charged to incremental hedging expenses, have been budgeted each year.

A (9): The retention bonus, payable over a two year period, was made to the Financial Trading Desk Head. Additional detailed information about this group and its activities can be found in FPL's response to hedging audit request no. 4, parts 3, 4, and 5.

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v confidential- Hedging audit request NO. 9

EXHIBIT C

JUSTIFICATION TABLE

SECOND REVISED EXHIBIT C

COMPANY:Florida Power & Light CompanyTITLE:List of Confidential Work PapersAUDIT:FPL, Hedging AuditAUDIT CONTROL NO:09-190-4-1DOCKET NO.150001-EIDATE:September 1, 2015

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

Workpaper No.	Description	No. of Pgs	Conf Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
2.	Filing	12	Y	Pgs. 1-12, Cols. C-F, Lns. 4-9	(d), (e)	G. Yupp
2-1	Filing	12	N			
9	External Audit	4	Y	ALL	(e)	E. Fuentes
10-1	Response to Document Request	1	Y	Lns. 34 -35	(e)	G. Yupp
12	Trial Balance	11	N			
42-1	Risk Management	11	N	Pgs. 1 -5	(e)	G. Yupp
	Plan		Y	Pg 6, Lns. 1A-5A, 6-7, 8A, 9A, 9B		
			N	Pg. 7		
. *			Y	Pg. 8, Lns. 1A-5A, 6-7, 8A, 9A, 9B		
			Y	Pg. 9, Lns. 1A-5A, 6-7, 8A, 9A, 9B, 10A, 11-16		
			N	Pgs. 10-11		
42-2	Trading & Risk Management Policy	26	Y	ALL	(e)	G. Yupp
42-3	Trading & Risk Management Policy	78	Y	ALL	(e)	G. Yupp
42-3/1	Summary of Changes	1	Y	ALL	(e)	G. Yupp
43-3/2	Summary of Changes	1	Y	ALL	(e)	G. Yupp
43	Summary	6	Y	Pg. 1, Lns. 1A, 2A	(d), (e)	G. Yupp
			N	Pg. 2		
			Y	Pg. 3, Lns. 1-3, Cols. A-M		
	a.		Y	Pg. 4, Lns. 1-3, Cols. A-H		
			Y	Pg. 5, Lns. 1A, 2A, 3-12, 13A, 14A, 14B, 14C, 15A		
			Y	Pg. 6, Col. A, Lns. 1-2		

Workpaper	Description	No.	Conf Y/N	Line No./Col. No.	Florida Statute	Affiant
No.	an an an an an Anna an Anna Anna Anna A	of Pgs	t/N		366.093 (3) Subsection	
43-1	Hedging Gains/ (Losses)	2	Y	Pg. 1, Cols. A-E Lns. 1A-4A, 5A, 6, 7A-10A	(d), (e)	G. Yupp
43-1/1	Lehman Brothers	2	N	Pg. 2, Cols. A-E Pg. 1	(d), (e)	G. Yupp
43-1/1-1	Lehman Brothers	1	Y Y	Pg. 2, Lns. 1A-5A Lns. 1A, 2, 3A, 4A, 5A, 6-13	(d), (e)	G. Yupp
43-1/1-2	Lehman Brothers	3	Y Y	Pgs. 1-2, Cols. A-G Pg. 3, Cols A-B	(d), (e)	G. Yupp
43-1/1-3	Lehman Brothers	3	Y	Lns. 1-3 ALL	(d), (e)	G. Yupp
43-1/1-3/1	Lehman Brothers	1	Y	Lns 1A, 2-4	(d), (e)	G. Yupp
43-1/1-3/2	NYMEX	1	N			
43-1/1-3/3	Lehman Brothers	1	Y	ALL	(d)	G. Yupp
43-1/1-3/4	Lehman Brothers	3	Y	Pg. 1, Lns. 1-9	(d), (e)	G. Yupp
			Y	Pgs. 2-3 , Cols. A-F, Lns. 1- 25 Cols. H-L, Lns. 1-13		
43-1/1-4	Lehman Brothers	2	Y	ALL	(d), (e)	G. Yupp
43-1/1-4/2	Yield Curve	1	Y	Lns. 1A, 2-3, 4A, 5A, 6-13, 14A	(e)	G. Yupp
43-1/1-5 ¹	Lehman Brothers	3	Y N	Pg. 1, Line 1A Pg. 2	(d), (e)	G. Yupp
			Y	Pg. 3, Cols. A-D Col. E, Lns. 1-4		
43-1/1-5/1	Lehman Brothers	2	N	Pg. 1	(d), (e)	G. Yupp
43-1/1-6	Lehman Brothers	18	Y Y	Pg. 2, Cols. A, B, C ALL	(d), (e)	G. Yupp
43-1/1-7	Lehman Brothers	1	N			
43-1/1-8	Lehman Brothers	1	N			
43-1/1-8/1	Lehman Brothers	1	Ν			
43-1/1-8/2	Lehman Brothers	4	Y	ALL	(e)	R. Sendler
43-1/1-8/3	Lehman Brothers	5	Y	Pg. 1, Lns. 1-20, 22-25	(e)	R. Sendler
43-1/1-9	Lehman Brothers	2	Y Y	Pgs. 2-5, ALL Pg. 1, Lns.1A, 2-3, 4A	(d), (e)	G. Yupp
			N	Pg. 2		

¹ Note: This workpaper number (43-1/1-5) appears to have been incorrect on the original workpaper index. It appears that the workpaper number should be 43-1/5.

Workpaper No.	Description	No. of	Conf Y/N	Line No./Col. No.	Florida Statute	Affiant
	All Carlos and All Ca	Pgs			366.093 (3) Subsection	
43-1/2	Lehman Brothers	1	Y	Lns. 1A, 2A, 3, 4A-9A, 9B, 10A-17A Cols. A-G	(d), (e)	G. Yupp
43-2	Filing	12	Y	Pgs. 1-12, Cols. C-F	(d), (e)	G. Yupp
43-2/1	Sample	1	Y	Cols. A-D	(d)	G. Yupp
43-2/2	Derivative Settlements	9	Y	ALL	(d), (e)	G. Yupp
43-2/2-1	Purchase Statement	2	Y	Pg. 1, Ln. 3A, Cols. A-E Pg. 2, Ln. 3A, Col. A, Col. B (except Ins. 1 and 2), Col. C, Col. D (except Ins. 1 and 2), Col. E	(d)	G. Yupp
43-2/2-2	Invoice	1	Y	Lns. 1 and 2 Cols. A-J	(d)	G. Yupp
43-2/3	Gas Closing Report	2	N	Pg. 1	(d), (e)	G. Yupp
	Report		Y	Pg. 2, Col. A, Lns. 2-4 Col. B, Lns. 1, 5-7		
43-2/3-1	Natural Gas Price Computations	2	Y N	Pg. 1, Col. A, Lns. 1-7 Pg. 2	(d), (e)	G. Yupp
43-3	Filing	12	N	· · · ·		
43-3/1 ²	Sample	1	Y	Cols. A-D	(d)	G. Yupp
43-3/2	Derivative Settlements	7	Y	Pg. 1, ALL	(d), (e)	G. Yupp
43-3/2-1	Purchase Statement	2	<u>N</u> N	Pgs 2-7		<u></u>
43-3/2-2	Invoice	1	N			
43-3/2-3	NYMEX	1	N	·		
43-3/3	M&S Corrections & Adjustments	1	Y	Col. A, Lns. 1-5, 6-7	(e)	G. Yupp
43-3/3-1	Financial	2	N			
43-4	Representation Letter	1	Y	Lns. 1A, 2A, 3	(d)	G. Yupp
43-5	OTC	1	Y	Col. A	(d)	G. Yupp
43-5/1	OTC	11	Y	Pg. 1-11, Cols. A-D	(d)	G. Yupp
43-5/2	OTC	1	Y	Lns. 1-3, 4 A, 5-6	(e)	G. Yupp

² Note: the "1" (43-3/1) for this workpaper number appears to have been eliminated from the page, likely during the copying process over the years.

Workpaper No.	Description	No. of Pgs	Conf Y/N	Line No./Col. No.	Florida Statute 366.093 (3)	Affiant
		. 90			Subsection	
43-6	Hedging Contracts	2	Ν			
43-6/1	Hedging Contracts	45	Y	ALL	(d)	G. Yupp
44-2	Payroll	2	Y	Pg. 1, Cols. C, F-G Col. I, (except Line 1)	(e)	G. Yupp
44-2/1	Payroll	1	Y	Pg. 2, Col. B (except Line 1) Col. A (except Line 1) Lns. 2-4 Col. B, Lns. 1-5	(e)	G. Yupp
44-2/1-1	Payroll	1	N		-	· · · · · · · · · · · · · · · · · · ·
44-2/1-2	Payroll	1	N			
44-2/1-3	Payroll	1	N			
44-2/1-4	Payroll	2	Y	Pg. 1, Col. A (except Lns. 1- 4)	(e)	G. Yupp
44-2/2	Payroll	2	Y	Pg. 2, Col. A (except Line 1) Pg. 1, Lns. 1-7 Pers. No. and employee name redacted (not highlighted) when originALLy provided to auditors	(e)	G. Yupp
			N	Pg. 2		
44-2/3	Payroll	2	Y	Pg. 1, Cols. A & B, Line 1	(e)	G. Yupp
44-2/4	Payroll	2	<u>N</u> Y	Pg. 2 Pg. 1, Lns. 1-7	(e)	G. Yupp
			- 	Pers. No. and employee name redacted (not highlighted) when originALLy provided to auditors		
			N	Pg. 2		
44-2/5	Payroll	2	Y	Pg. 1, Lns. 1-7 Pers. No. and employee name redacted (not highlighted) when originALLy provided to auditors	(e)	G. Yupp
1			N	Pg. 2		
44-2/6	Payroll	2	Ŷ	Pg. 1, Lns. 1-7 Pers. No. and employee name redacted (not highlighted) when originALLy provided to auditors	(e)	G. Yupp
			N	Pg. 2		
44-2/7	Payroll	2	Ŷ	Pg. 1, Lns. 1-7 Pers. No. and employee name redacted (not highlighted) when originALLy provided to auditors	(e)	G. Yupp
			N	Pg. 2		
44-2/8	Payroll	2	Ŷ	Pg. 1, Lns. 1-7 Pers. No. and employee name redacted (not highlighted) when originALLy provided to auditors	(e)	G. Yupp

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Workpaper No.	Description	No. of	Conf Y/N	Line No./Col. No.	Florida Statute	Affiant
ana Ar internetional and an an		Pgs	- 414		366.093 (3) Subsection	
			N	Pg. 2		
44-2/9	Payroll	1	Y	Col. A Line 1B	(e)	G. Yupp
44-2/11	Segregation of Duties	1	N			
44-2/12	Segregation of Duties	8	Y	ALL	(e)	G. Yupp
44-2/13	Segregation of Duties	4	Y	ALL	(e)	G. Yupp
44-2/14	Segregation of Duties	6	Y	ALL	(e)	G. Yupp
44– 2/15	Segregation of Duties	1	Y	ALL	(e)	G. Yupp
45	Rebalancing	1	Y	Lns. 1A-3A	(e)	G. Yupp
45-1	Rebalancing	1	Y	Cols. A-B, C-D Line 1A	(e)	G. Yupp
45-2	Rebalancing	1	Y	Cols. A, B-E, F-H Lns. 1A, 2A	(e)	G. Yupp
45-2/1	PPS	2	Y	ALL	(e)	G. Yupp
45-2/1-1	PPS	2	Y	ALL	(e)	G. Yupp
45-2/1-2	PPS	3	Y	ALL	(e)	G. Yupp
45-2/2	PPS	3	Y	ALL	(e)	G. Yupp
45-2/2-1	PPS	3	Y	ALL	(e)	G. Yupp
45-2/2-2	PPS	3	Y	ALL	(e)	G. Yupp
45-2/2-3	PPS	3	Y	ALL	(e)	G. Yupp
45-2/2-4	PPS	2	Y	ALL	(e)	G. Yupp
45-2/3	PPS	3	Y	ALL	(e)	G. Yupp
45-2/3-1	PPS	3	Y	ALL	(e)	G. Yupp
45-2/3-2	PPS	3	Y	ALL	(e)	G. Yupp
45-2/3-3	PPS	3	Y	ALL	(e)	G. Yupp
45-2/3-4	PPS	3	Y	ALL	(e)	G. Yupp
45-2/4	PPS	3	Y	ALL	(e)	G. Yupp
45-2/4-1	PPS	3	Y	ALL	(e)	G. Yupp
45-2/4-2	PPS	3	Y	ALL	(e)	G. Yupp
45-2/4-3	PPS	3	·Y	ALL	(e)	G. Yupp
45-2/5	Summary of PPS Changes	2	Y	Pgs. 1-2, Lns. 1-6	(e)	G. Yupp

Workpaper No.	Description	No. of Pgs	Conf Y/N	Line No./Col. No.	Florida Statute 366.093 (3)	Affiant
45-3	Rebalancing	1	Y	Lns. 1A-4A	Subsection (e)	G. Yupp
45-3/1	Rebalancing	1	Y	ALL	(d), (e)	G. Yupp
45-3/1-1	Rebalancing	3	N			
45-3/1-1/1	Rebalancing	3	N			
45-3/1-1/2	Rebalancing	3	N			
45-3/2	Rebalancing	1	Y	ALL	(e)	G. Yupp
45-3/2-1	Rebalancing	3	Y	ALL	(d), (e)	G. Yupp
45-3/2-2	Rebalancing	3	Y	ALL	(d), (e)	G. Yupp
45-3/2-3	Rebalancing	1	Y	Lns. 1A-3A, 4A-5A, 6A,6B, 7A, 7B, 8A-10A, 11, 12A-14A, 15A, 15B, 16A, 16B, 17A- 19A, 19B, 20A-21A	(d), (e)	G. Yupp
45-3/2-3/1	Rebalancing	3	Y	ALL	(e)	G. Yupp
45-3/3	Rebalancing	1	N			
45-3/3-1	Rebalancing	2	Y	ALL	(e)	G. Yupp
45-3/3-2	Rebalancing	1	Y	Lns. 1A, 2A, 3	(e)	G. Yupp
45-3/3-2/1	Rebalancing	2	N	Pg. 1	(e)	G. Yupp
			Y	Pg. 2, Lns. 1A, 2A	i	
46-1	VaR	1	Y	ALL	(d), (e)	G. Yupp
46-1/1	VaR	35	Y	ALL	(e)	G. Yupp
47-1	Sample Testing	1	Y	Lns. 1A, 1B, 2A, 2B, 3A, 3B, 4A, 4B, 5A, 5B, 6A, 6B, 7A, 7B, 8A-11A	(d), (e)	G. Yupp
47-1/1	Sample Testing	1	N			
47-1/2	Sample Testing	1	Y	Lns. 1, 2	(e)	G. Yupp
48	Testimony	4	N			
48-1	Testimony	4	N			

EXHIBIT D

AFFIDAVITS

SECOND 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. 150001-EI

STATE OF FLORIDA) COUNTY OF PALM BEACH COUNTY)

AFFIDAVIT OF ROBERT SENDLER

BEFORE ME, the undersigned authority, personally appeared Robert Sendler who, being first duly sworn, deposes and says:

My name is Robert Sendler. I am currently employed as Vice President and Chief 1. Litigation Counsel. I have personal knowledge of the matters stated in this affidavit.

I have reviewed the documents referenced and incorporated in FPL's Second 2. Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 09-190-4-1 for which I am identified as the affiant. Such documents or materials that I have reviewed and which are asserted by FPL to be proprietary and confidential business information contain or constitute competitively sensitive data, the disclosure of which would impair FPL's competitive business. Specifically, the documents pertain to the provision of legal services, which if disclosed would result in a waiver of attorney-client privilege. The documents also include information concerning bids or contractual data, the disclosure of which would impair FPL's efforts to procure legal services on favorable terms in the future and would impair the competitive interests of the legal services providers. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-14-0119-CFO-EI 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 at least an additional eighteen (18) months. These materials 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.

Affiant says nothing further, 4.

Robert Sendler

SWORN TO AND SUBSCRIBED before me this 17th day of August 2015, by Robert Sendler, who is personally known to me and who did take an oath.

My Commission Expires:

Notary Public, State of Florida

:2779037

SECOND 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: 150001-EI

STATE OF FLORIDA

PALM BEACH COUNTY

AFFIDAVIT OF GERARD J. YUPP

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

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My name is Gerard J. Yupp. I am currently employed by Florida Power & Light 1. 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 affidavit.

I have reviewed the documents referenced and incorporated in FPL's Second 2. Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 09-190-4-1 for which I am identified as the affiant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information regarding data pertinent to FPL's procurement activities and hedging program. Specifically, the documents contain information regarding physical and financial details related to FPL's annual hedging program for natural gas and fuel oil. Additionally, the information contains monthly realized values for FPL's hedge positions and the resulting impact on the cost of natural gas and oil. The information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

Nothing has occurred since the issuance of Order No. PSC-14-0119-CFO-EI to 3. 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 at least an additional eighteen (18) months. These materials 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.

Affiant says nothing further. 4.

SWORN TO AND SUBSCRIBED before me this /7 day of August 2015, 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.

MY COMMISSION # FE

EXPIRES: May 30, 2017

My Commission Expires:

MARITZA MIRANDA WS5 tary Public, State of Florida

SECOND 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. 150001-EI

STATE OF FLORIDA

COUNTY OF MIAMI-DADE

AFFIDAVIT OF ELIZABETH FUENTES

BEFORE ME, the undersigned authority, personally appeared Elizabeth Fuentes who, being first duly sworn, deposes and says:

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1. My name is Elizabeth Fuentes. I am currently employed by Florida Power & Light Company ("FPL") as Director of Regulatory Accounting. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the documents referenced and incorporated in FPL's Second Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 09-190-4-1 for which I am identified as the affiant. Such documents or materials that I have reviewed and which are asserted by FPL to be proprietary and confidential business information contain information regarding FPL's competitive interests. Specifically, the information consists of notes by the Florida Public Service Commission auditors of reports prepared by external auditors regarding FPL's fuel contracts and commodity trades. This information, if made public, would disclose certain competitively sensitive procedures to the detriment of FPL and its customers, and would disclose certain competitively sensitive procedures 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. Nothing has occurred since the issuance of Order No. PSC-14-0119-CFO-EI 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 at least an additional eighteen (18) months. These materials 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.

Elizabeth Fuentes

SWORN TO AND SUBSCRIBED before me this day of August 2015, by Elizabeth Fuentes, who is personally known to me and who did take an oath.

Notary Public, State of Florida

My Commission Expires:

