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April 6, 2016

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

RECEIVED-FPSC
2016 APR -6 PM 3:03
COMMISSION
CLERK

Re: Docket No. 160001-EI **REDACTED**

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Certain Information Contained in Hedging Activity Report, submitted as Exhibit GJY-2 to the prepared direct testimony of FPL witness Gerard J. Yupp. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declaration in support of FPL's Request for Confidential Classification.

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

Sincerely,

Maria J. Moncada

- COM _____
- AFD **Redacted** _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- TEL _____
- CLK _____

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

4010498

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 160001-EI

Filed: April 6, 2016

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF CERTAIN
INFORMATION CONTAINED IN HEDGING ACTIVITY REPORT (Exhibit GJY-2)**

Florida Power & Light Company ("FPL"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, requests confidential classification of certain information contained in FPL's Hedging Activity Report, submitted as Exhibit GJY-2 to the prepared testimony of Gerard J. Yupp (the "Confidential Information"). In support of its Request, FPL states as follows:

1. On April 6, 2016, FPL filed the testimony of Gerard J. Yupp, including Exhibit GJY-2, in support of its August 2015 through December 2015 Hedging Activity True-up Report. Exhibit GJY-2 contains information of a confidential nature. Pursuant to Rule 25-22.006(3)(a), F.A.C., FPL files this Request for Confidential Classification.

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

a. Exhibit A consists of a copy of Exhibit GJY-2, in which all of the Confidential Information that FPL asserts is entitled to confidential treatment has been highlighted.

b. Exhibit B consists of a copy of Exhibit GJY-2 in which all of the Confidential Information that FPL asserts is entitled to confidential treatment has been redacted.

c. Exhibit C is a table that identifies the information highlighted in Exhibit A, together with references to the specific statutory bases for the claim of confidentiality and to the declarant who supports the requested confidential classification.

d. Exhibit D is the declaration of Gerard J. Yupp in support of this request.

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

4. FPL's Fuel Hedging Activity Report contains or constitutes data pertinent to FPL's fuel hedging program. Specifically, the Hedging Activity Report provides the physical and financial details related to FPL's year-to-date hedging results for natural gas. Additionally, as required by Order No. PSC-15-0284-FOF-EI, the Hedging Activity Report contains separate pages that provide a detailed comparison of gas reserve projects entered into on behalf of FPL or its affiliate (pursuant to gas reserves guideline II.A) and the results for gas reserve projects entered and/or held by any affiliate or subsidiary of NextEra Energy, Inc. ("NEE") (pursuant to gas reserves guideline II.B).

5. The information contained in the Hedging Activity Report, if disclosed would impair the efforts of FPL to contract for goods and services on favorable terms for the benefit of its customers. This information is protected by Sections 366.093(3)(d), F.S.

6. Additionally, disclosure of the information would impair the competitive interests of FPL and its affiliates, and would place FPL and its affiliates at a competitive disadvantage

when coupled with other information that is publicly available. This information is protected by Sections 366.093(3) (e), F.S.

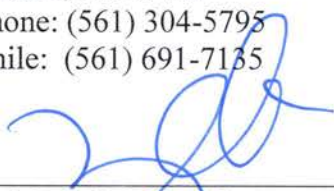
7. Upon a finding by the Commission that the Confidential Information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), F.S., such materials should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as the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

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

Respectfully submitted this 6th day of April, 2016.

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John T. Butler, Esq.
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By: _____


Maria J. Moncada
Fla. Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 160001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification* has been furnished by electronic service on this 6th day of April 2016 to the following:

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By: _____


Maria J. Moncada
Fla. Bar No. 0773301

* The exhibits to this Request are not included with the service copies, but a redacted version of Exhibit GJY-2 (Exhibit B) is included with the testimony of Mr. Yupp that is being served on all parties, and copies of Exhibits C and D are available upon request.

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EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

CONFIDENTIAL


	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1						
2						
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4	YEAR-TO-DATE	GAS RESERVES				
5	(JAN - DEC) 2015	SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
8						
9						\$ (504,393,229)
10						
11		AVERAGE PERIOD OF HEDGE (Years) - GAS RESERVES				
12		AVERAGE PERIOD OF HEDGE (Days) - FINANCIAL				

CONFIDENTIAL

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A	B	C	D	E	F
<u>PERIOD</u>	<u>INSTRUMENT</u>	FPL NATURAL GAS PROCUREMENT			<u>SAVINGS/(COSTS)</u>
January-2015	GAS RESERVES SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
		[REDACTED]			

CONFIDENTIAL

1	A	B	C	D	E	F
2				FPL NATURAL GAS PROCUREMENT		
3	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
4	February-2015	GAS RESERVES				
5		SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
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<u>PERIOD</u>	<u>INSTRUMENT</u>	FPL NATURAL GAS PROCUREMENT				
March-2015	GAS RESERVES SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	<u>PURCHASES</u>	VOLUME (MMBTU)	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>

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A	B	C	D	E	F
		FPL NATURAL GAS PROCUREMENT			
<u>PERIOD</u>	<u>INSTRUMENT</u>	VOLUME (MMBTU)			
		<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
April-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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A	B	C	D	E	F	
<u>PERIOD</u>	<u>INSTRUMENT</u>	FPL NATURAL GAS PROCUREMENT				
May-2015	GAS RESERVES SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	<u>PURCHASES</u>	VOLUME (MMBTU)	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
		[REDACTED]				


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A	B	C	D	E	F
<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	FPL NATURAL GAS PROCUREMENT		<u>SAVINGS/(COSTS)</u>
June-2015	GAS RESERVES SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES		VOLUME (MMBTU)	<u>SALES</u>	<u>OPTION PREMIUMS</u>

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A	B	C	D	E	F
		FPL NATURAL GAS PROCUREMENT VOLUME (MMBTU)			
<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
July-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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A	B	C	D	E	F
<u>PERIOD</u>	<u>INSTRUMENT</u>	FPL NATURAL GAS PROCUREMENT			<u>SAVINGS/(COSTS)</u>
August-2015	GAS RESERVES SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	<u>PURCHASES</u>	VOLUME (MMBTU)	<u>SALES</u>	<u>OPTION PREMIUMS</u>

CONFIDENTIAL

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1						
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4	September-2015	GAS RESERVES				
5		SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
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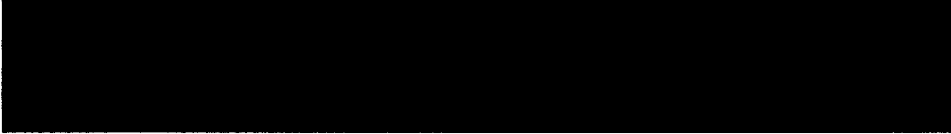
CONFIDENTIAL

1	A	B	C	D	E	F
2			FPL NATURAL GAS PROCUREMENT			
3	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
4	October-2015	GAS RESERVES				
5		SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
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	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
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4	November-2015	GAS RESERVES				
5		SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
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CONFIDENTIAL

1	A	B	C	D		E	F
				FPL NATURAL GAS PROCUREMENT			
2	PERIOD	INSTRUMENT	VOLUME (MMBTU)		OPTION PREMIUMS	SAVINGS/(COSTS)	
3			PURCHASES	SALES			
4	December-2015	GAS RESERVES					
5		SWAPS					
6		OVER-THE-COUNTER OPTIONS					
7		BROKER FEES					
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Results of FPL's Economic Evaluation⁽⁷⁾
PetroQuest⁽¹⁾

	A	B	C	D	E	F = C + D + E	G = F / B	H	I = B x (H-G)	J	K = I x J	Change from Original Filing			
	Period	Year	Annual Production (Bcf) ⁽⁶⁾	Operating Expenses (\$MM)	Depreciation (\$MM)	Return Rate (\$MM) ⁽³⁾	Revenue Requirement (\$MM)	Effective Cost (\$/MMBtu)	FPL Market Price Forecast (\$/MMBtu) ⁽⁴⁾	Undiscounted Customer Savings (\$MM)	FPL Discount Factor	Discounted Customer Savings (\$MM)	Effective Cost (\$/MMBtu) ⁽⁸⁾	FPL Market Price Forecast (\$/MMBtu) ⁽⁸⁾	Discounted Savings Due to Decrease in Costs
5	1	2015	6.9					\$3.90	\$2.27	(\$11.3)	0.93	(\$10.5)	\$0.42	(\$1.75)	\$2.7
6	2	2016	17.2					\$3.03	\$2.40	(\$10.9)	0.86	(\$9.4)	(\$0.53)	(\$1.90)	(\$7.9)
7	3	2017	12.4					\$3.21	\$2.71	(\$6.3)	0.80	(\$5.0)	(\$0.78)	(\$2.00)	(\$7.8)
8	4	2018	9.2					\$3.46	\$2.83	(\$5.8)	0.75	(\$4.3)	(\$0.94)	(\$2.91)	(\$6.4)
9	5	2019	7.4					\$3.86	\$3.51	(\$2.6)	0.69	(\$1.8)	(\$1.10)	(\$2.37)	(\$5.7)
10	6	2020	6.3					\$4.09	\$3.60	(\$3.1)	0.64	(\$2.0)	(\$0.70)	(\$2.43)	(\$2.8)
11	7	2021	5.5					\$4.32	\$4.26	(\$0.4)	0.60	(\$0.2)	(\$0.62)	(\$1.88)	(\$2.0)
12	8	2022	4.9					\$4.49	\$4.52	\$0.1	0.56	\$0.1	(\$0.59)	(\$1.82)	(\$1.6)
13	9	2023	4.4					\$4.64	\$4.83	\$0.9	0.52	\$0.5	(\$0.57)	(\$1.80)	(\$1.3)
14	10	2024	4.1					\$4.79	\$5.42	\$2.6	0.48	\$1.2	(\$0.55)	(\$1.61)	(\$1.1)
15	11	2025	3.8					\$4.71	\$5.41	\$2.6	0.45	\$1.2	(\$0.53)	(\$1.92)	(\$0.9)
16	12	2026	3.5					\$4.78	\$5.39	\$2.1	0.42	\$0.9	(\$0.54)	(\$2.24)	(\$0.8)
17	13	2027	3.3					\$4.85	\$5.56	\$2.3	0.39	\$0.9	(\$0.54)	(\$2.37)	(\$0.7)
18	14	2028	3.1					\$4.91	\$5.74	\$2.5	0.36	\$0.9	(\$0.54)	(\$2.59)	(\$0.6)
19	15	2029	2.9					\$4.99	\$5.92	\$2.7	0.33	\$0.9	(\$0.53)	(\$2.71)	(\$0.5)
20	16	2030	2.7					\$5.07	\$6.11	\$2.8	0.31	\$0.9	(\$0.51)	(\$2.72)	(\$0.4)
21	17	2031	2.6					\$5.15	\$6.30	\$2.9	0.29	\$0.8	(\$0.50)	(\$2.87)	(\$0.4)
22	18	2032	2.4					\$5.22	\$6.50	\$3.1	0.27	\$0.8	(\$0.49)	(\$3.02)	(\$0.3)
23	19	2033	2.3					\$5.32	\$6.70	\$3.1	0.25	\$0.8	(\$0.48)	(\$3.18)	(\$0.3)
24	20	2034	2.1					\$5.41	\$6.84	\$3.0	0.23	\$0.7	(\$0.47)	(\$3.42)	(\$0.2)
25	21	2035	2.0					\$5.51	\$6.98	\$2.9	0.22	\$0.6	(\$0.46)	(\$3.67)	(\$0.2)
26	22	2036	1.9					\$5.61	\$7.21	\$3.0	0.20	\$0.6	(\$0.44)	(\$3.85)	(\$0.2)
27	23	2037-65	24.1					\$7.85	\$10.49	\$63.8	0.10	\$6.2	(\$0.04)	(\$6.66)	(\$0.1)
28	Totals⁽²⁾		134.9	\$312.6	\$162.8	\$169.1	\$644.5			\$60.2		(\$15.3)			(\$39.5)

Notes:

- (1) Includes actuals through February 2016 and current estimates thereafter.
- (2) Totals are for 2015-2065, an assumed 50 year project life. Totals may not add due to rounding.
- (3) Return rate includes return on capital and return of capital.
- (4) Utilizes FPL's January 2016 long-range forecast.
- (5) Decrease in effective cost since filing due primarily to higher gross production estimates and lower cost to produce gas.
- (6) Change in Market Price forecast since original filing.
- (7) Guidelines IIA and IIB - Supplemental Information attached for additional analysis.
- (8) Includes Btu conversion factor based on actual methane content.

Results of FPL's Economic Evaluation (Affiliate Transaction - US Gas Assets)

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	A	B	C	D	E	F=C+D+E	G=F/B	H	I = B x (H-G) Undiscounted	J	K = I x J	
	Period	Year	Annual Production (Bcf)	Operating Expenses (\$MM)	Depreciation (\$MM)	Return Rate ⁽²⁾ (\$MM)	Revenue Requirement (\$MM)	Effective Cost (\$/MMBtu) ⁽³⁾	FPL Market Price Forecast ⁽⁴⁾ (\$/MMBtu)	Customer Savings ⁽³⁾ (\$MM)	FPL Discount Factor	Discounted Customer Savings (\$MM)
5	1	2015	0.2					\$2.74	\$2.14	(\$0.1)	0.97	(\$0.1)
6	2	2016	2.2					\$2.56	\$2.44	(\$0.3)	0.90	(\$0.2)
7	3	2017	1.3					\$2.96	\$2.76	(\$0.3)	0.84	(\$0.2)
8	4	2018	0.9					\$3.33	\$2.88	(\$0.4)	0.78	(\$0.3)
9	5	2019	0.7					\$3.72	\$3.57	(\$0.1)	0.73	(\$0.1)
10	6	2020	0.6					\$3.98	\$3.66	(\$0.2)	0.67	(\$0.1)
11	7	2021	0.5					\$4.26	\$4.31	\$0.0	0.63	\$0.0
12	8	2022	0.4					\$4.50	\$4.57	\$0.0	0.58	\$0.0
13	9	2023	0.4					\$4.73	\$4.89	\$0.1	0.54	\$0.0
14	10	2024	0.4					\$4.98	\$5.47	\$0.2	0.50	\$0.1
15	11	2025	0.3					\$5.20	\$5.46	\$0.1	0.47	\$0.0
16	12	2026	0.3					\$5.40	\$5.44	\$0.0	0.44	\$0.0
17	13	2027	0.3					\$5.62	\$5.61	(\$0.0)	0.41	(\$0.0)
18	14	2028	0.3					\$5.83	\$5.79	(\$0.0)	0.38	(\$0.0)
19	15	2029	0.2					\$6.05	\$5.97	(\$0.0)	0.35	(\$0.0)
20	16	2030	0.2					\$6.26	\$6.16	(\$0.0)	0.33	(\$0.0)
21	17	2031	0.2					\$6.47	\$6.35	(\$0.0)	0.30	(\$0.0)
22	18	2032	0.2					\$6.68	\$6.55	(\$0.0)	0.28	(\$0.0)
23	19	2033	0.2					\$6.92	\$6.75	(\$0.0)	0.26	(\$0.0)
24	20	2034	0.2					\$7.16	\$6.89	(\$0.0)	0.24	(\$0.0)
25	21	2035	0.2					\$7.41	\$7.03	(\$0.1)	0.23	(\$0.0)
26	22	2036	0.2					\$7.68	\$7.26	(\$0.1)	0.21	(\$0.0)
27		2037-65	2.5					\$14.28	\$10.87	(\$8.5)	0.06	(\$0.5)
28		Totals⁽¹⁾	13.0	\$55.3	\$12.9	\$10.9	\$79.1			(\$9.8)		(\$1.5)

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Notes:

- (1) Totals are for 2015-2065, an assumed 50 year project life. Totals may not add due to rounding.
- (2) Return rate includes return on capital and return of capital.
- (3) Average conversion rate of 1 cubic foot = 1,000 btu's
- (4) Utilizes FPL's January 2016 long-range forecast.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET TITLE: Fuel and purchased power cost recovery clause with generating performance incentive factor
DOCKET NO: 160001-EI
SUBJECT: Fuel Hedging True-up Results
DATE: April 6, 2016

Page No.	Description	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
1	FPL Natural Gas Procurement (Jan - Dec 2015)	Y	Cols. C and D, lines 4-8, 11-12 Col. E, lines 4-8, Col. F, line 4-7	(d), (e)	G. Yupp
2	FPL Natural Gas Procurement January 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
3	FPL Natural Gas Procurement February 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
4	FPL Natural Gas Procurement March 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
5	FPL Natural Gas Procurement April 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
6	FPL Natural Gas Procurement May 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
7	FPL Natural Gas Procurement June 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
8	FPL Natural Gas Procurement July 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
9	FPL Natural Gas Procurement August 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
10	FPL Natural Gas Procurement September 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
11	FPL Natural Gas Procurement October 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
12	FPL Natural Gas Procurement	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp

Page No.	Description	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
	November 2015				
13	FPL Natural Gas Procurement December 2015	Y	Cols. C-F, lines 4-8	(d), (e)	G. Yupp
14	Results of FPL's Economic Evaluation PetroQuest Detailed comparison of all gas reserve projects entered into on behalf of FPL or its affiliate (Guideline II.A.)	Y	Cols. C-F, lines 6-28	(d), (e)	G. Yupp
15	Results of FPL's Economic Evaluation (US Gas Assets Transaction) Results (gains or losses) for gas reserve projects entered and/or held by any affiliate or subsidiary of NextEra Energy (Guideline II.B.)	Y	Line 2 Cols. C-F, lines 6-28	(d), (e)	G. Yupp

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 160001-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)


DECLARATION OF GERARD J. YUPP

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

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification of Fuel Hedging Information. The documents and materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute data pertinent to FPL's hedging program. Specifically, the documents contain information regarding the physical and financial details related to FPL's monthly hedging results for natural gas. Additionally, the Hedging Activity Report contains separate pages that provide a detailed comparison of gas reserve projects entered into on behalf of FPL or its affiliate, as well as the results for gas reserve projects entered and/or held by any affiliate or subsidiary of NextEra Energy, Inc. ("NEE"). This information, if disclosed, would impair the efforts of FPL to contract for goods and services on favorable terms for the benefit of its customers. Further, disclosure would impair the competitive interests of FPL, NEE or their affiliates or vendors, and would place FPL, NEE or their affiliates at a competitive disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

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



GERARD J. YUPP

Date: 4/4/16