



Maria J. Moncada
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September 14, 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 SEP 14 PM 2:12
COMMISSION
CLERK

Re: Docket No. 160001-EI

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Materials Provided Pursuant to Audit No. 16-068-4-1. The request includes Exhibits A, B (two copies), C and D.

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

REDACTED

Sincerely,

Maria J. Moncada

Enclosure

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

COM _____
AFD _____
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IDM _____
TEL _____
CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 160001-EI

Date: September 14, 2016

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 16-068-4-1**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 16-068-4-1 ("the Audit"). In support of this request, FPL states as follows:

1. During the Audit, FPL provided Staff with various confidential documents. By letter dated August 24, 2016, Staff indicated its intent to retain certain audit work papers. Pursuant to Rule 25-22.006(3)(a), FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the work papers. Accordingly, FPL files this Request for Confidential Classification to maintain continued confidential handling of the confidential work papers.

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

a. Exhibit A consists of a copy the confidential documents, on which all information that is entitled to confidential treatment under Florida law has been highlighted.

b. Exhibit B consists of a copy of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted. For the documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A by page and line and a brief description of the confidential information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarant who supports the requested classification.

d. Exhibit D contains the declaration of Gerard J. Yupp in support of this Request.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission 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. As described more fully in the declaration included as Exhibit D, certain documents contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

5. Also, certain information in these documents concern FPL's competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

6. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information

should not be declassified for a period of 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. *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 Request for Confidential Classification be granted.

Respectfully submitted,

John T. Butler
Assistant General Counsel - Regulatory
Maria J. Moncada
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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. 160001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification* has been furnished by electronic mail on this 14th day of September 2016 to the following:

Danijela Janjic, Esq.
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mcassel@fpuc.com

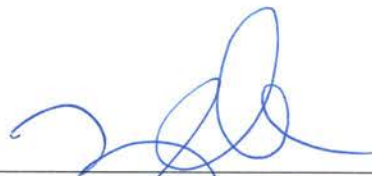
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Tallahassee, Florida 32301
jmoyle@moylelaw.com

By: _____



Maria J. Moncada
Florida Bar No. 0773301

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

5439130

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

CONFIDENTIAL

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

48-16.1

✓ = Traced to the August Derivative Settlement Report without exceptions. MB.

CONFIDENTIAL

Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt. 160001-EI; ACN 16-068-4-1
Description: Filing

PBC
SOURCE: DR 2 item 2

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

48-16-2

✓ = Traced to the September Derivative Settlement Report without exceptions. WQ.

Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt. 160001-EI; ACN 16-068-4-1
Description: EU 179

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SOURCE PBC DC 2 item 2

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[Signature]

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PERIOD	INSTRUMENT	FPL NATURAL GAS PROCUREMENT VOLUME (MMBTU)			
		PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
October-2015	GAS RESERVES SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			

48-10.3

V = Traced to the October Derivative Settlement Report without exceptions. [Signature]

Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 160001-EI; ACN 16-068-4-1

Description: filling

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SOURCE: DR 2 item 2

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		FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
November-2015	GAS RESERVES				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				



AG-8
AG-16.4

Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 160001-EI; ACN 16-068-4-1

Description:

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SOURCE PBC DD 2 item 2

Description:

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PERIOD	INSTRUMENT	FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
		PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
December-2015	GAS RESERVES SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			

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V. = Traced to the December Derivative Settlement Report without exceptions 10

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SOURCE DR 2 Item 2

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[Signature]

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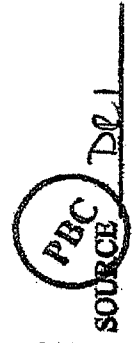
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		FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
January-2016	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES				

✓ = Traced to the January Derivative Settlement Report without exceptions. MA.

AP-16.6

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Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 16001-EI ACN 16-068-4-1
Description: *[Signature]*



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PERIOD	INSTRUMENT	FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
		PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
February-2016	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			

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V = Traded to February
Derivative Settlement Report
without exceptions. uia.

CONFIDENTIAL

Historical Test Year Ended July 31, 2016
Dkt 160001-EI ACN 16-068-4-1

Description:

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SOURCE [initials]

Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 160001-EI ACN 16-068-4-1

Description: SWAPS

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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>
1	March-2016	FIXED PRICE TRANSACTIONS				
2		SWAPS				
3		OVER-THE-COUNTER OPTIONS				
4		BROKER FEES				
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48-14.8

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CONFIDENTIAL

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Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 160001-EI; ACN 16-068-4-1
Description:

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[Signature]

CONFIDENTIAL

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1 2 3 4 5 6 7 8 9 10 11	A	B	C	D	E	F
	<u>PERIOD</u>	<u>INSTRUMENT</u>	FPL NATURAL GAS PROCUREMENT			
			<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
	April-2016	FIXED-PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			

28-16.9

V=Traced to April Derivative Settlement Report without exceptions. WA.

CONFIDENTIAL



SOURCE: [Signature]

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[Handwritten initials]

CONFIDENTIAL

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			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	May-2016	FIXED PRICE TRANSACTIONS				
2		SWAPS				
3		OVER-THE-COUNTER OPTIONS				
4		BROKER FEES				
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15-16-10

V= Traced to May Derivative Settlement Report without exceptions. WA.

Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 16001-EI; ACN 16-068-4-1
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Description:

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SOURCE: DR1

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Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 160001-EI, ACN 16-068-4-1
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		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>
June-2016	FIXED PRICE TRANSACTIONS				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				



48-16-11

V = Traced to June Derivative Settlement Report without exceptions. UG.

CONFIDENTIAL

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SOURCE: DR1

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		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-2016	FIXED PRICE TRANSACTIONS				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				



48-16.12

✓ = Traced to July Derivative Settlement Report without exceptions NA.

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Hedging Audit
Fiscal Test Year Ended July 31, 2016
Docket 160001-EI; ACN 16-008-4-1
Description: [Signature]

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FPL traders generally execute trades with counterparties offering the best price for a given instrument. However, in a case where two or more counterparties are offering similar pricing, the traders will attempt to execute trades with the counterparty that has the least amount of credit exposure with FPL. This is done primarily to allow FPL to spread its risk among as many counterparties as possible, but also affords the advantage of preventing the inadvertent telegraphing of FPL's commercial intentions to the market, thus helping to ensure favorable pricing for FPL's hedges.

2015 Hedging Strategy (TFB-4, Items 2 and 8)

FPL plans to hedge a portion of its projected 2016 natural gas requirements during 2015. 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

- 1) FPL will hedge approximately [redacted] of its projected 2016 natural gas requirements within the Hedging Window during 2015. This hedge percentage is consistent with 2015 hedge levels and is within FPL's system base load requirements. FPL will hedge approximately [redacted] of each individual month's projected natural gas requirements.
- 2) FPL will utilize financial swaps and/or physical fixed price transactions to hedge its projected natural gas requirements.
- 3) Should FPL enter into any joint venture transactions for natural gas reserves and these transactions are approved by the FPSC, the expected natural gas production from these transactions will be included as hedged volumes.
- 4) FPL will execute its natural gas hedges for 2016 from [redacted] through [redacted] as shown below:

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2016

Hedging Window									
Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct

During each month of the Hedging Window, FPL will hedge the percentages shown of its projected 2016 natural gas requirements. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.

- 5) FPL intends to rebalance its natural gas hedge positions during the year based on changes in forecasted market prices, projected unit outage schedules or

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Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 160001-EI; ACN 16-068-4-1
Description: Risk Mgt Plan 2016

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RD

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 [REDACTED]. Therefore, the minimum and maximum monthly hedge percentages are [REDACTED] respectively.

48-10

Heavy Fuel Oil

FPL does not intend to hedge heavy fuel oil for 2016. FPL discontinued fuel oil hedging in 2013 and the factors that influenced that decision still remain.

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

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

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

Specifically, several reports are available at FPL to monitor risk:

Daily Management Report

For each business day there is a formal report produced in hard copy or electronically, for distribution to business and desk heads and members of the EMC. This report details the current energy, spot and forward, unrealized profit and loss, VaR, and position amounts. This report is published only after proper and thorough discussion between Risk Management and desk heads, if necessary for clarification, and resolution of any issues raised.

Credit Exposure Reporting

For each business day there is a formal report produced in hard copy or electronically, for distribution to business and desk heads and members of the EMC. This report details:

- Allowable deal types by counterparty
- Restrictions on counterparties

SOURCE PBC DR 2 Item 1

48-1.5

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Numbers 48-1.7 and 48-1.8

[2 Pages]

Fuel Procurement Policy & Procedures

CONFIDENTIAL

Hedging Audit
Historical Year Ended July 31, 2016
Dkt 1600 ACN 16-068-4-1

Description: Sarbanes Oxley Compliance

7-25-16

Hedging Audit 2016 – Docket No. 160001
Audit Request No. 12

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

A:

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

2) FPL incorporates proper separation of duties into all of its hedging activities. Separation of duties is specifically addressed in the NextEra Energy, Inc. Energy Trading and Risk Management Policy. It states:

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In addition, the Trading and Risk Management Procedures Manual provides additional detail, description, and explanation for the various activities outlined in the Policy. Compliance requirements, both individual and supervisory, are addressed within the Policy and Procedures documents. The Policy and Procedures manuals were provided in response to Hedging Audit Request No. 2.

Sarbanes Oxley 404 Compliance -
Process Narrative was reviewed.
UB.

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Florida Power & Light Company
Hedging Audit - Filing-2016

March Filing (2016)

Month	Derivative Report Gains/Loss A	WP 48-16 Series Broker Fees B	Gas Reserves C	WP 2 series Per Filing Gains/Loss D	Broker Fee Difference E
August					
September					
October					
① November					
December					
Total					

August Filing (2016)

January					
February					
② March					
April					
May					
June					
July					
Total					

Hedging Audit
Historical Test Year Ended July 31, 2016
DIN 16001-B1; ACN 16-068-4-1
Description: Reconciliation to Billing

CONFIDENTIAL
C = immaterial - pass.
① November was tested in WP 48-6 - 48-6.9
② March was tested in WP 48-6.10 - 48-6.21

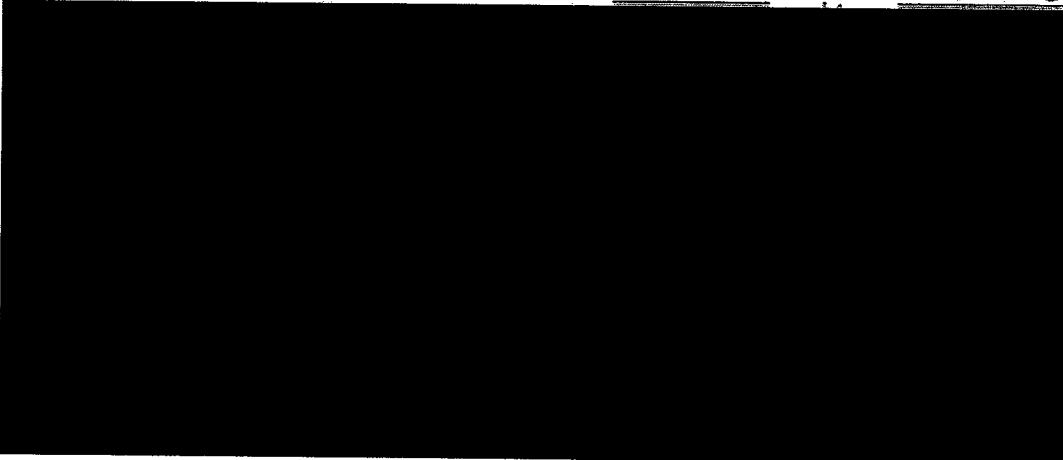
SOURCE REFERENCED

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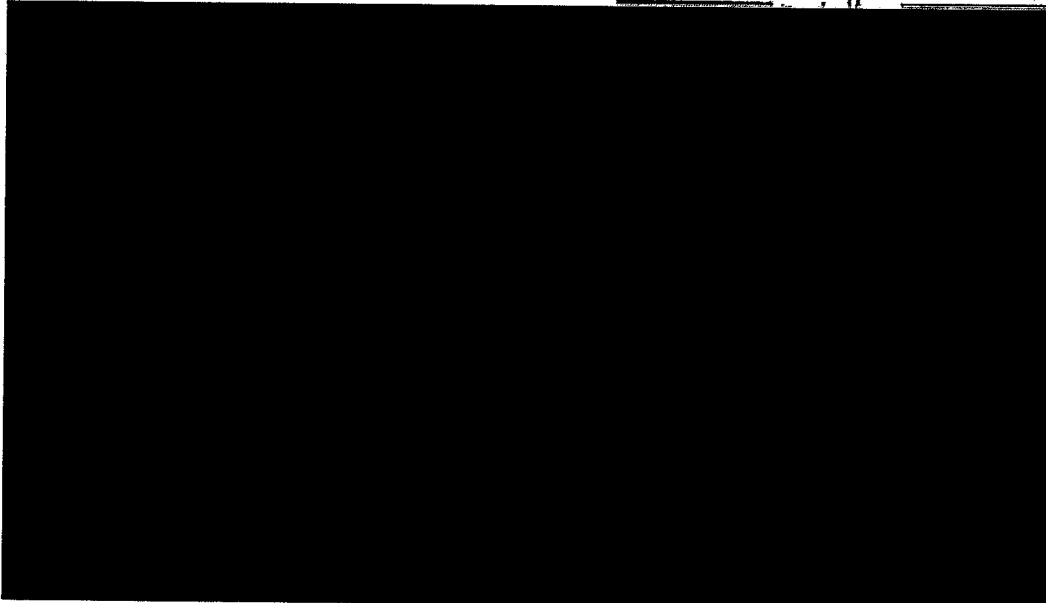
FPL COUNTERPARTIES

November-15

A	Volume B	Gain/Loss C
		48-6.6
		48-6.7
		48-6.8
	48-6.9	
	48-6.10	
	48-7	

CONFIDENTIAL

Mar-16

D	Volume E	Gain/Loss F
		48-6.17
		48-6.18
		48-6.19
		48-6.20
	48-7.3	
	48-6.21	
	48-6.22	

Tested

SOURCE As referenced

48-5

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Numbers 48-6 through 48-6.21

[22 Pages]

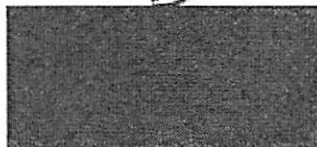
Derivative Reports

125-14
A



Michelle Doery
Michelle Doery

Manager, Power & Fuels Accounting



GST/HST/QST Registration #: 105248165 RT0001

SETTLEMENT INVOICE

Client: FLORIDA POWER AND LIGHT COMPANY	Invoice Date: 29-Oct-2015
Attention: Sharon Patric	Invoice Number: 2055401
Phone No: 561 691 7897	Currency: USD
Fax No: 1 561 625 7199	Payment Due Date: 04-Nov-2015
Email: Sharon.patric@fpl.com	

DIG
18-10
148-10

Payment Wire Instructions:

Beneficiary Bank: JP Morgan Chase Bank NA	Intermediary Bank:
Beneficiary Bank SWIFT: [REDACTED]	Intermediary Bank SWIFT:
Beneficiary Bank ABA: [REDACTED]	Intermediary Bank ABA:
Beneficiary Name: [REDACTED]	Account Number:
Beneficiary SWIFT: [REDACTED]	
Beneficiary Account #: [REDACTED]	
IBAN: [REDACTED]	
Ref: [REDACTED]	

CONFIDENTIAL

Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016.
Dkt 160001-EE; ACN 16-068-4-1

Description:

ENTERED BY: SHARON PATRIC DATE: 11/2/15
PHONE: (561) 691-7897 COMPANY CODE: 7500

AUTHORIZED BY: _____

REQUIRED IF UNDER \$250

SAP DOCUMENT #(S): 1900410640

ACCT NUMBER: 2500000 6376001498

PBC
SOURCE DP 14

48-7

Florida Power & Light
Hedging Audit
Historical Test Year Ended July 31, 2016.
Dkt 160001-EJ; ACN 16-068-4-1

Description:

Account	Buy/Sell	Trade Type	Trade Date	Start Date	End Date	Volume	Rate	Product/Instrument	Fixed/Floating	Index/Fixed	Price	Spread
2586596	Sell	Natural Gas Swap										
2596435	Sell	Natural Gas Swap										
2601890	Sell	Natural Gas Swap										
2622900	Sell	Natural Gas Swap										
2632313	Sell	Natural Gas Swap										
2644003	Sell	Natural Gas Swap										
2645042	Sell	Natural Gas Swap										
2688959	Sell	Natural Gas Swap										
2701045	Sell	Natural Gas Swap										
2735745	Sell	Natural Gas Swap										
2774397	Sell	Natural Gas Swap										

Sub Total

[Redacted]

Total

[Redacted]

A

B

C
D
E
F
G
H
I
J
K
L
M

Handwritten notes and initials in the top right corner.

Handwritten: 12/24/15

Purchase Statement



Florida Power & Light Company
Tax ID #: 59-0247775
ARMS Processing (PPC/GO)
General Mall Facility
Miami, FL 33188-001

CONFIDENTIAL

Purchase Statement: 289483 A
Counterparty: [Redacted] 1
Date: Nov 02, 2015
Period: Nov 01, 2015 - Nov 30, 2015
Amount: [Redacted] 2
Due Date: Nov 04, 2015

Handwritten: 48-7.2

Historical Test Year Ended July 31, 2016
Dkt 160001-EI; ACN 16-068-4-1
Hedging Audit
State Street

Pay To: [Redacted]

Deal Type	Deal Direction	Amount Due	Currency
SWPS	Buy	[Redacted]	USD
SWPS Subtotal		[Redacted]	USD
TOTAL		[Redacted]	USD

Details

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Deal Price	Float Price	Pay Price	Amount Due	Currency
1282461	Deal										USD
1290231	Deal										USD
1294958	Deal										USD
1306732	Deal										USD
1312238	Deal										USD
1320693	Deal										USD
1321062	Deal										USD

V = traced deal price to the contract price. Did not retain as part of (2015) WORKPAPERS.ME

SOURCE: PPC DR 14

210
8/24/14

Purchase Statement



Florida Power & Light Company
Tax ID # 59-0247775

Purchase Statement: 289483 A
Counterparty: [REDACTED] 1
Date: Nov 02, 2015
Period: Nov 01, 2015 - Nov 30, 2015
Amount: [REDACTED] 2
Due Date: Nov 04, 2015

48-7.2.1

Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 160001-EL, ACN 16-068-4-1
Description: STOCK MARKET

Deal #	Type	Intra-D	Term	Index	Volume	UoM	Deal Price	Float Price	Pay Price	Amount Due	Currency
SWPS											
Buy		B	C	D	E	F	G	H	I	J	
1349584	Deal	[REDACTED]								USD	1
1357432	Deal	[REDACTED]								USD	2
1378494	Deal	[REDACTED]								USD	3
1404802	Deal	[REDACTED]								USD	4
	Buy Subtotal	[REDACTED]								USD	5
	SWPS Subtotal	[REDACTED]								USD	6
	TOTAL	[REDACTED]								USD	7

48-5

CONFIDENTIAL

V = traced deal price to the contract price. Did not remain as part of workpapers. ne.
 U = traced to platts gas daily. WP. 48-7.2.2

SOURCE: PBC PRE 14

72514

A
[Redacted]

CONFIDENTIAL

Invoice 1524699-1

Summary Invoice

Invoice Date: Feb-26-2016
Invoice Number: 1524699-1
Due Date: Mar-03-2016

B
[Redacted]

FLORIDA POWER & LIGHT
COMPANY
PO BOX 029100
MIAMI 331029100
USA

From: [Redacted]
Voice: [Redacted]
Fax: [Redacted]
Email: [Redacted]

Attn: Penelope Campos
Voice:
Fax:

Account: 057936445

Description	Amount Due
-------------	------------

Swap	[Redacted] USD
	[Redacted] USD
Due Date: <u>Mar-03-2016</u>	[Redacted] USD 48-5
	[Redacted] USD 48-6.21

Please send payments by WIRE to:

E
[Redacted]

Michelle Doery
Michelle Doery
Manager, Power & Fuels Accounting

PENLOPE CAMPOS DATE: 3/1/16

1911 891-2754 COMPANY CODE: 1000

REQUINED IF UNDED SPED
DOCUMENT # (S): 19004288310
SERIAL: 2500000/16370001498

SOURCE PBC DR 14

48-7.3

Handwritten initials and date: 2/25/16

Description: INVOICE



CONFIDENTIAL

Invoice 1524699-1

Detail Invoice

Please be advised that the following swaps have priced out

Trade ID	Trade Date	Swap	Quantity	We Pay	You Pay	Amount Due
16686103						USD
16675152						USD
16638781						USD
16636462						USD
16609601						USD
16597387						USD
16591899						USD
16572291						USD
16360763						USD
16551130						USD
16540322						USD
16537350						USD
16536800						USD
16522160						USD
16503535						USD
16485613						USD
16460545						USD
16454822						USD
16429761						USD
16420282						USD
16381983						USD
16351993						USD

Handwritten: 48-6.21
 Due Date: Mar-03-2016

Please send payments by WIRE to:

SOURCE PBC DR 1A

Handwritten: 48-7.3.1

7/6
1.25.11

Purchase Statement



Florida Power & Light Company
Tax ID # 59-0247775
ARMS Processing (PFC/GO)
General Mail Facility
Miami, FL 33188-001

Purchase Statement: 306296

A

Counterparty: [REDACTED]

Date: Feb 28, 2016

Period: Mar 01, 2016 - Mar 31, 2016

Amount: [REDACTED]

Due Date: Mar 03, 2016

2

48-7.4

CONFIDENTIAL

Pay To

Summary

Deal Type: Deal Direction Amount Due Currency
SWPS

Buy
SWPS Subtotal
TOTAL

USD
USD
USD

48-6.21

Details

Description: Deal # Type Trade Dt Term Index Volume UoM Deal Price Float Price Pay Price Amount Due Currency

Buy

D E F G H I J K L

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Deal Price	Float Price	Pay Price	Amount Due	Currency
1436897	Deal										USD
1445923	Deal										USD
1454088	Deal										USD
1457234	Deal										USD
1464759	Deal										USD
1467484	Deal										USD

Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 160001-EI, ACN 16-068-4-1

SWPS

SOURCE: PBC DR1A

72514



Purchase Statement



FPL

Florida Power & Light Company
Tax ID # 59-0247775

CONFIDENTIAL

Purchase Statement: 306296

A

Counterparty: [REDACTED]

Date: Feb 29, 2016

Period: Mar 01, 2016 - Mar 31, 2016

Amount: [REDACTED]

Due Date: Mar 03, 2016

1
2

48-74.1

Hedging Audit
Historical Test Year Ended July 31, 2016
DIR 160001-EL; ACN 16-068-4-1

Deal #	Type	Trade Dt	Term	Index	Volume	UoM	Deal Price	Float Price	Pay Price	Amount Due	Currency
SWPS											
- Buy											
1474552	Deal										
1482244	Deal										USD
1488050	Deal										USD
1494627	Deal										USD
1495207	Deal										USD
1496937	Deal										USD
1499470	Deal										USD
1501627	Deal										USD
1506933	Deal										USD
1509477	Deal										USD
1511522	Deal										USD
1515867	Deal										USD
1524343	Deal										USD
1524830	Deal										USD
1534749	Deal										USD
1538278	Deal										USD

V = traced deal price to the contract price. Did not retain as part of workpapers. (DEIS)

W = traced to Platts gas daily WP 48-4.1.2

Buy Subtotal	[REDACTED]	USD
SWPS Subtotal	[REDACTED]	USD
TOTAL	[REDACTED]	USD

48-5

SOURCE PBC PERM

CONFIDENTIAL

Hedging Audit
Historical Test Year Ended July 31, 2016
Dkt 160001-EL; ACN 16-068-4-1

(ESTIMATED EXPE. Description: monthly gas closing NOV 2015 (ADJUSTMENTS))

12/16/16
12/16/16

SESH USAGE CHARGE (#040001)	11,808,319	0.0084	\$	73,653.25	Contract Term Sep 6, 2008 through Sep 5, 2020
SESH RESERVATION CHARGE (#040002)	3,000,000	0.2755	\$	825,000.00	Contract Term Sep 6, 2008 through Sep 5, 2020
SESH USAGE CHARGE (#040003)	3,000,000	0.0084	\$	18,200.00	Contract Term Sep 6, 2008 through Sep 5, 2020
SESH RESERVATION CHARGE (#040007-R1)	80,000	8.3846	\$	669,166.40	Contract Term Jan 1, 2012 through Dec 31, 2017
SESH USAGE CHARGE (#040007-R1)	2,400,000	0.0059	\$	14,158.89	Contract Term Jan 1, 2012 through Dec 31, 2017
TRANSCONTINENTAL RESERVATION CHARGE (#9101640)	6,000,000	0.00945	\$	596,700.00	Contract Term May 1, 2011 through Apr 30, 2018
TRANSCONTINENTAL USAGE CHARGE (#9101640)	5,241,712	0.00457	\$	23,954.63	Contract Term May 1, 2011 through Apr 30, 2018
REBUNDLED - FGT	1,481,211	0.0000	\$	-	REBUNDLED FIRM TRANSPORT
REBUNDLED - Gulfstream	70,989	0.0000	\$	-	REBUNDLED FIRM TRANSPORT
Subtotal for Transportation	162,437,302	B	\$	48,254,866.35	

BAY GAS STORAGE (Monthly Charge on 2.5 MM Capacity Including Subtotal for Storage Costs)

FGT - Turkey Point Compressor Station #22	0	0.0000	\$	150,000.00
FGT - Cape Canaveral Compressor Station #32	0	0.0000	\$	300,000.00
FGT - Pompano Beach Compressor Station #21.5	0	0.0000	\$	100,000.00
TOTAL	0	0.0000	\$	550,000.00

TOTAL

GAS RESERVES

OWED TO

Gas Reserves - Physical
Gas Reserves - Transportation

TOTAL

D	E	F	
QNTY (MMBTU)	UNIT PRICE (\$/MMBTU)	CUMULATIVE REDUCTION (\$)	COMMENTS

OTHER MISCELLANEOUS EXPENSES INCURRED FOR CURRENT MONTH: (TO BE PAID IN FOLLOWING MONTH, UNLESS NOTED OTHERWISE)

OWED TO	QNTY (MMBTU)	UNIT PRICE (\$/MMBTU)	INVOICE AMT (\$)	COMMENTS
FGT Financial Activity				REFER TO FINANCIAL ATTACHMENT
Power Related Financial Activity				
Total Financial Activity Related to Fuel Expense				
Total Adjustments				REFER TO EXPENSE ATTACHMENT
TOTAL				

CARMS (MISC. BILLS) FOR MONEY RECEIVED DURING CURRENT MONTH:

FROM	CARMS INVOICE	UNIT PRICE (\$/MMBTU)	AMT RECEIVED (\$)	COMMENTS
Sales				
Adjustments			0.00	REFER TO SALES TAB
Optimization Sales			4,267,835.42	REFER TO OPTIMIZATION SALES TAB (refer to tab for
TOTAL			4,267,835.42	

NET CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT MONTH

ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH (MMBTU)

EQUIVALENT UNIT PRICE FOR CURRENT MONTH (\$/MMBTU)

\$	202,914,484.34
\$	51,542,084
\$	3,9389

FGT "GAS DAY" ENERGY MEASURED for MONTH	FGT STATION	AVG HEAT VALUE (MMBTU/MCF)	HEAT VALUE APPLICABLE TO:
31,687,366	BROOKER =	1.0200	PPM, PSN, PCC
[MMBTU]	PERRY STREAM 1 =	1.0200	FTMYERS
Gulfstream delivered to Manatee/Martin/West County for MONTH	WEST PALM =	1.0220	PWR, PRV, FPE, PFL, PCU, PTF
20,003,623	GNSS =	1.0195	MANATEE
	GNSS =	1.0195	MARTIN
51,691,489	GNSS =	1.0195	WEST COUNTY

CONFIDENTIAL



SOURCE DR 16 response

48-8

Florida Power & Light
 Hedging Audit
 Historical Test Year Ended July 31, 2016
 Dkt 160001-EI; ACN 16-068-4-1
 Description: S. ENTA

Company Code: 3305000 ACCRUED FUEL EXPENSES
 1500

	A	B	C	D	E	F
9999						
9999						
20151130						
109969428						
109969428						
109979715						
ALL						
ALL						
SA						
SA						
6370000482						11/25/2015
6370000482						11/29/2015
6370000482						11/30/2015
6370000482						12/30/2015
6370000482						

48-8
 Traded to monthly gas
 closing report. NA.

CONFIDENTIAL



SOURCE _____

48-8.1

CONFIDENTIAL

Historical Test Year Ended July 31, 2016

Dkt 160001-EI; ACN 16-068-4-1

Description: monthly gas closing March 2016

(ESTIMATED EXPENSES - SUBSEQUENTLY ADJUSTED BY ACCOUNTING DEPT FOR PRIOR MONTH ADJUSTMENTS)

Handwritten initials and date: AD 6/21/16

BECH USAGE CHARGE (#940097-R2)	2,471,857	0.0059	\$	14,584.13	Contract Term Jan 1, 2012 through Dec 31, 2017
TRANSCONTINENTAL RESERVATION CHARGE (#9101646)	5,200,000	0.0385	\$	810,580.00	Contract Term May 1, 2011 through Apr 30, 2016
TRANSCONTINENTAL USAGE CHARGE (#9101646)	5,733,357	0.0046	\$	26,201.44	Contract Term May 1, 2011 through Apr 30, 2010
REBUNDLED FGT		0.0000	\$		REBUNDLED FIRM TRANSPORT
REBUNDLED Gulfstream		0.0000	\$		REBUNDLED FIRM TRANSPORT
Subtotal for Transportation	145,768,565		\$	49,024,577.43	
BAY GAS STORAGE (Monthly Charge on 2.5 MM Capacity including Subtotal for Storage Costs)					
FGT - Turkey Point Compressor Station #22	0	0.0000	\$	150,000.00	
FGT - Cape Canaveral Compressor Station #32	0	0.0000	\$	190,000.00	
FGT - Pompano Beach Compressor Station #21.5	0	0.0000	\$	250,000.00	
Subtotal for Adjustments	0	0.0000	\$	(952,632.90)	

TOTAL

GAS RESERVES

OWED TO

Gas Reserves - Physical
Gas Reserves - Transportation

TOTAL

QWED TO	QNTY (MMBTU)	UNIT PRICE (\$/MMBTU)	CUMULATIVE REDUCTION (\$)	COMMENTS
---------	--------------	-----------------------	---------------------------	----------

OTHER MISCELLANEOUS EXPENSES INCURRED FOR CURRENT MONTH: [TO BE PAID IN FOLLOWING MONTH, UNLESS NOTED OTHERWISE]

QWED TO	QNTY (MMBTU)	UNIT PRICE (\$/MMBTU)	INVOICE AMT (\$)	COMMENTS
FGT Financial Activity				REFER TO FINANCIAL ATTACHMENT
Power Related Financial Activity				
Total Financial Activity Related to Fuel Expense				
Total Adjustments				REFER TO EXPENSE ATTACHMENT
TOTAL				

CARMS (MISC. BILLS) FOR MONEY RECEIVED DURING CURRENT MONTH:

FROM	CARMS INVOICE	UNIT PRICE (\$/MMBTU)	AMT RECEIVED (\$)	COMMENTS
Sales				
Adjustments			(2,118.32)	REFER TO SALES TAB
Optimization Sales			5,696,897.40	REFER TO OPTIMIZATION SALES TAB (refer to tab for
TOTAL			5,694,779.08	

NET CASH FLOW (EXPENSES LESS RECEIPTS) FOR CURRENT MONTH

ENERGY RECEIVED (NET OF FUEL) DURING CURRENT MONTH (MMBTU)

EQUIVALENT UNIT PRICE FOR CURRENT MONTH (\$/MMBTU)

\$	180,004,138.34
	47,843,861
	3.3631

FGT "GAS DAY" ENERGY MEASURED for MONTH

28,360,452	
(MMBTU)	

Gulfstream deliveries to Manatee/Martin/West County for MONTH	19,026,679
---	------------

47,377,331

AVG HEAT VALUE (MMBTU/MCF)

BROOKER =	1.0250
PERRY STREAM 1 =	1.0250
WEST PALM =	1.0240
GNGS =	1.0212
GNGS =	1.0211
GNGS =	1.0215

HEAT VALUE APPLICABLE TO:

PPN, PSN, PCC
Manatee/PMYor
PMR, PRV, PPE, PPL, PCU, PTF
MANATEE
MARTIN
WEST COUNTY

CONFIDENTIAL



SOURCE

DR 116

48-8.2

55
 Account
 Company Code

3305000 ACCRUED FUEL EXPENSE
 1500

A B C D E F

□	20160331	110927818	ALL	SA			
□	20160331	1900433333	ALL	2M			
□	20160331	1900433377	ALL	2M			
□	20160331	1900433377	ALL	2M			
+						6370000482	03/31/2016
+						6370000482	03/31/2016
+						6370000482	03/31/2016
+						6370000482	03/31/2016
+						6370000482	03/31/2016
+						6370000482	03/31/2016
+						6370000482	03/31/2016

→ 48-8.2
 traced to monthly
 gas closing report. na

ADDITIONAL SERVICES AND FEES
 Hedging Audit
 Fiscal Year Ended July 31, 2016
 16000LEH; ACN 16-068-4-1
 Description: Entry

CONFIDENTIAL

SOURCE PBC DE LU

48-8.3

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Numbers 48-9 through 48-9.5

[6 Pages]

Planned Position Strategy

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Fuel Audit Workpaper Numbers 48-11 through 48-11.12

[12 pages]

Projected Burn

AD
7/15/16

Hedging Audit 2016 – Docket No. 160001
Audit Request No. 4

CONFIDENTIAL

Q:

- 1) Were there any miscellaneous expenses (office expense, labor, etc.) charged to Hedging? If yes, please provide detail, amount, amounts charged, etc. If not, please provide an explanation as to why there are no miscellaneous expenses.
- 2) Were there any futures or forwards instruments used during the period of August 1, 2015 to July 31, 2016?
- 3) Please provide the transaction costs (commissions, fees paid, etc.) for each counterparty that FPL, or a representative of FPL, has contracts with. Please provide this information by transaction for the period August 1, 2015 to July 31, 2016.
- 4) If FPL participates in any derivatives and/or hedging activities with any affiliate, please explain how the transaction costs are separated between the individual entities.

A:

- 1) No. Pursuant to Order No. PSC-10-0153-FOF-EI, issued March 17, 2010, in Docket Nos. 080677-EI and 090130-EI, effective March 1, 2010, FPL ceased recording all incremental hedging expenses as recoverable costs through the fuel clause. Once FPL began to recover incremental hedging costs through base rates in March 2010, FPL started recording those costs in FERC accounts 501210 and 547210 along with other fuel-related base rate costs. Consequently, "Incremental Hedging" costs, personnel, and positions are no longer separately budgeted or tracked.
- 2) No. FPL's financial hedging program did not utilize futures or forwards during the period from August 1, 2015 to July 31, 2016. A detailed description of FPL's financial hedging program is included in the Company's Risk Management Plan filed with the Commission each year.
- 3) Currently, the only transaction costs incurred by FPL's financial hedging program are Intercontinental Exchange, Inc. (ICE) brokerage charges. Users are charged a
1 [REDACTED]
2 [REDACTED] Total broker fees are included on the Hedging Activity reports filed each April and August.
- 3 [REDACTED]
4 [REDACTED] Commissions are expensed in the month incurred. These costs flow through account 3305000 to G/L account 2300000 directly and are not included in the FPL Derivative Settlements reports. G/L account 2300000 is the FPL Fuel Inventory account.
- 4) FPL does not participate in any derivatives and/or hedging activities with any affiliate. While activity associated with physical natural gas hedging (Woodford Gas Reserves Project) was initially considered to be part of FPL's hedging program, all

mu
7-12-14

Recalculated
by staff

48-10

Latest Projection Date	ENHANCED HEDGING PROGRAM POSITIONS					
	Financial Hedged (1) MMBtu	Gas Production Hedged (2) MMBtu	Financial Hedged (3) Dollars	Gas Production Hedged (4) Dollars	Financial Hedge (Avg Price)	Hedged % (5/6)
August-15						
September-15						
October-15						
November-15						
December-15						
January-16						
February-16						
March-16						
April-16						
May-16						
June-16						
July-16						

NATURAL GAS	
GenTrader Projection	
MMBtu	
August-15	
September-15	
October-15	
November-15	
December-15	
January-16	
February-16	
March-16	
April-16	
May-16	
June-16	
July-16	

Note (1): Financial Hedged volumes are based upon projected fuel burns
 Note (2): Gas Production volumes (physical gas reserves) are based on actual volumes for Aug-2015 to May-2016 and initial estimates for June-2016
 Note (3): Financial Hedged dollars represent a calculated notional value (trade price * volume purchased and/or sold)
 Note (4): Gas Production dollars are based on actual costs of gas production activities.
 Note (5): Projections are (re)calculated each month. Rebalancing transactions are executed to bring hedged percentages within approved tolerance bands. No rebalancing is needed if projected heavy oil burn is less than 10,000 bbls/month.
 Note (6): Hedged percentages are allowed to fall outside of approved tolerance bands, in certain circumstances, with management approval.

GENERATING SYSTEM DATA (A3)			
NATURAL GAS			
	ACTUAL (A3) MMBtu	ACTUAL (A3) Dollars	AVERAGE COST (A3) Dollar/MMBtu
August-15	60,678,811	\$274,985,894	\$4.53
September-15	59,137,910	\$263,361,038	\$4.45
October-15	57,487,854	\$247,287,327	\$4.30
November-15	51,513,119	\$211,739,177	\$4.11
December-15	49,159,609	\$205,488,209	\$4.18
January-16	43,073,160	\$172,614,616	\$4.01
February-16	38,383,775	\$157,548,569	\$4.10
March-16	45,172,523	\$162,639,373	\$3.60
April-16	53,615,904	\$198,586,796	\$3.69
May-16	55,301,053	\$201,301,097	\$3.65
June-16	NA	NA	NA
July-16	NA	NA	NA

Florida Power & Light
 Hedging Audit
 Historical - Year Ended July 31, 2016
 Dkt 160001, W/ ACN 16-068-4-1
 Description: PLANNED POSITION STRATEGY

1. Hedged percents should [redacted] (wp 48-9)
 2. [redacted] (wp 48-9)

3. Traced to fuel burn summaries. (wp 48-11 series)
 3. Traced to monthly derivative settlement reports

CONFIDENTIAL

PBC
 DR 5
 SOURCE

AD 8.9.14

Hedging Audit 2016 – Docket No. 160001
Audit Request No. 11

Q:

1) Please provide a statement explaining the treatment of transaction costs and brokerage fees for the period August 1, 2015 to July 31, 2016.

A:

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

1/2

[REDACTED] Total broker fees are included on the Hedging Activity reports filed each April and August.

3
4

[REDACTED] Commissions are expensed in the month incurred. These costs flow through account 3305000 to G/L account 2300000 directly and are not included in the FPL Derivative Settlements reports. G/L account 2300000 is the FPL Fuel Inventory account.

wp
48-16
series.

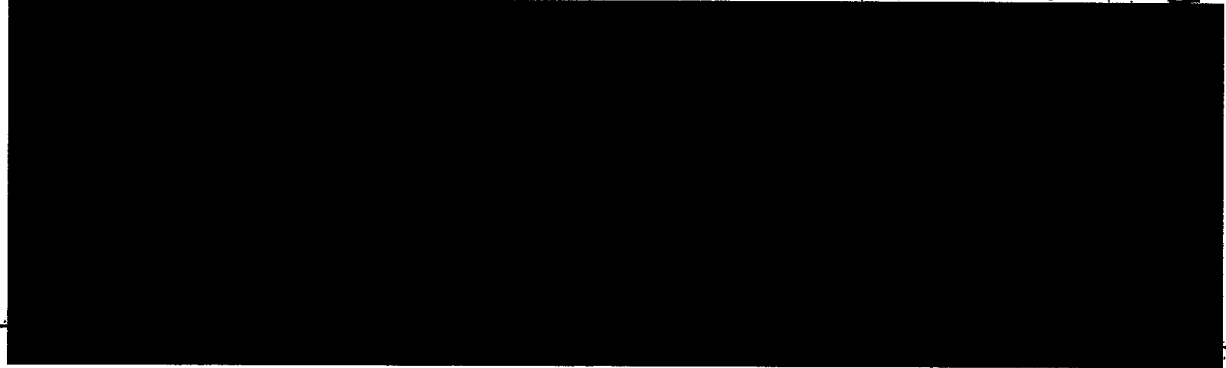
CONFIDENTIAL

AA 8/14

Aug-15

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMT	Gas Purchases - EMT	FPL Gas Operations	Optimization	

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Halber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	✓ Gas 48-1.7
Lystra Loutan	✓ Gas
Tracy Yupp	Power/Gas
Jeff Dunn	Power
Paul Zhang	✓ Gas 48-1.7



48-1101

Florida Power & Light
 Accounting Audit
 Historical Year Ended July 31, 2016
 Dkt 160001-EJ ACN 16-068-4-1
 Description: Bid Package 685

CONFIDENTIAL

✓ = name of trader traced to appendix A of the EMT Trading and Risk Management Procedure Manual.

✗ = traced to invoice provide by company. Did not retain in workpapers.

PBC
 SOURCE DE II

Handwritten initials: *AS/116*

Sep-15

Art Morris
Bill Miller
Shirley Steff
Bill Murphy
Mirielys Nieto
Chuck Helber
Luther Hall
Jerry Hildreth
Raj Iyer ✓
Lystra Loutan ✓
Gerry Yupp
ff Dunn
Paul Zhang ✓

Gas
Gas
Gas
Gas
Optimization
Power/Optimization
Power
Optimization
Gas
Gas
Power/Gas
Power
Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMTA	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	



Handwritten number: 48-16.2

Florida Power & Light
Billing Audit
Historical (can Ended July 31, 2016)
Bit 16000-01; ACN 16-068-4-1
Description: HYDROGEN FEES

CONFIDENTIAL

SOURCE PBC DD11

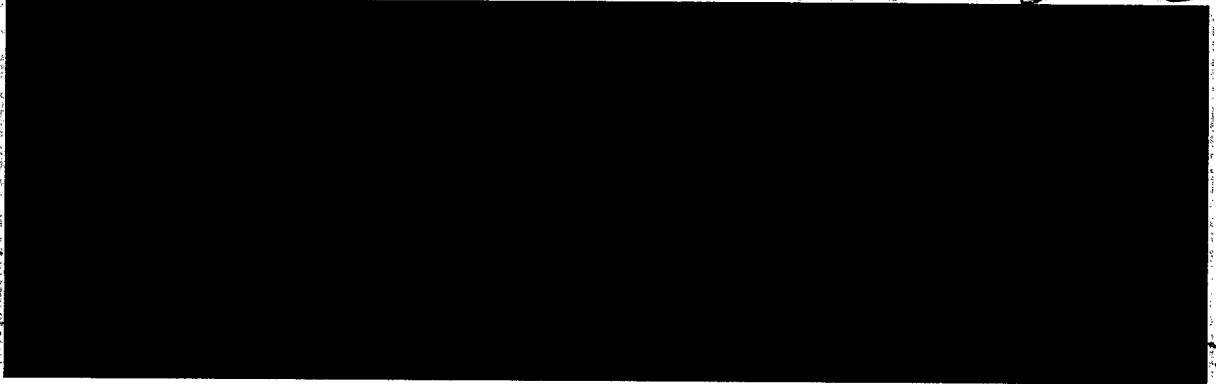
me
08/16

Oct-15

Art Morris
Bill Miller
Shirley Steff
Bill Murphy
Mirtelys Nieto
Chuck Helber
Luther Hall
Jerry Hildreth
Raj Iyer ✓
Hua Li
Garry Yupp
ff Dunn
Paul Zhang ✓

Gas
Gas
Gas
Gas
Optimization
Power/Optimization
Power
Optimization
Gas
Gas
Power/Gas
Power
Gas

G/L 5760220 I/O 6120000502	G/L 3306000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	E
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	



7

48-16.3

Florida Power & Light
Auditing Audit
Historical Year Ended July 31, 2016
Dkt 160001-EH; ACN 16-068-4-1
Description: Bridge Fee

CONFIDENTIAL

SOURCE
PBC
DRU

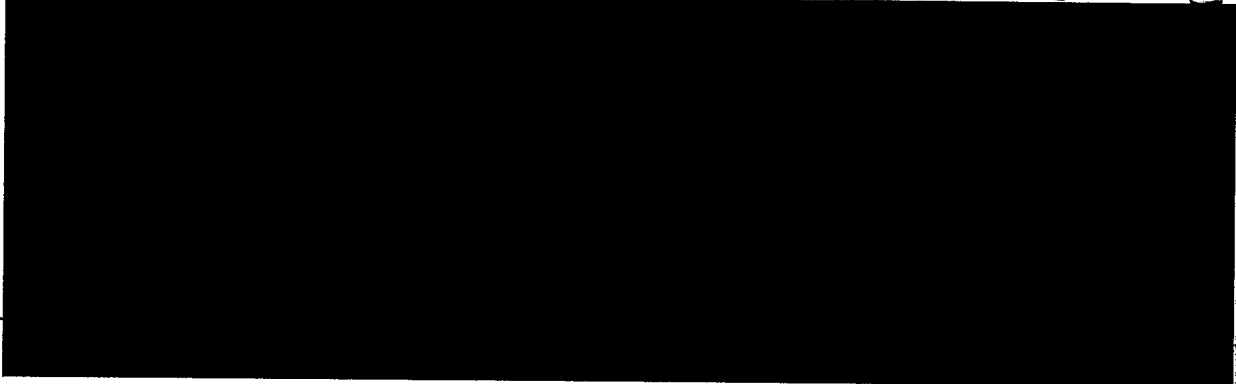
ANS/1/14

Nov-15

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirfelys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer ✓	Gas
Hua Li	Gas
Gerry Yupp	Power/Gas
ff Dunn	Power
Caul Zhang ✓	Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D

TOTAL



8

48-10.4

Florida Power & Light
 Billing Audit
 Historical Total Year Ended July 31, 2016
 Dtd 160001-EE; ACN 16-068-4-1
 Description: **BYOURAGE PLS**

CONFIDENTIAL

SOURCE PBC DR11

AS/110

48-1695

Dec-15

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirelys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Hua Li	Gas
Gerry Yupp	Power/Gas
Jeff Dunn	Power
Caul Zhang	Gas



Florida Power & Light
 Signing Audit
 Historical Year Ended July 31, 2016
 Dist 160001-EM; ACN 16-968-4-1
 PricewaterhouseCoopers
 Description:

CONFIDENTIAL

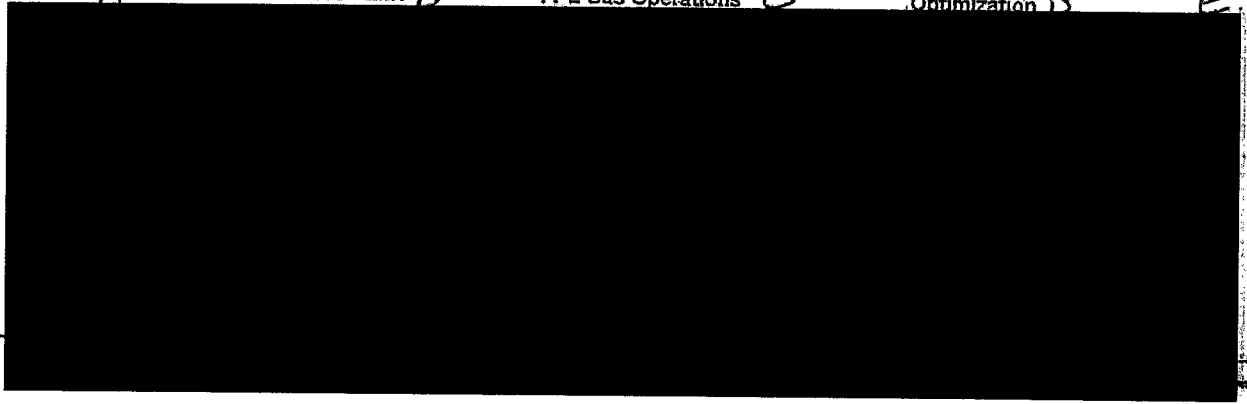
PBC
 SOURCE
 PREP

25
2/16/16

Jan-16

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer ✓	Gas
Hua Li	Gas
Gerry Yupp	Power/Gas
ff Dunn	Power
Paul Zhang ✓	Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	TOTAL
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E



A

48-16.6

Fluor Power & Light
 Engineering Audit
 Historical Test Year Ended July 31, 2016
 Dkt 160001-Elj ACN 16-068-4-1
 Description: **SIDING & L.S.**

CONFIDENTIAL

PBC
 SOURCE (DR1)

NA
8/1/16
Q

Feb-16

Ari Morris Gas
 Bill Miller Gas
 Shirley Steff Gas
 Bill Murphy Gas
 Mirielys Nieto Optimization
 Chuck Helber Power/Optimization
 Luther Hall Power
 Jerry Hildreth Optimization
 Raj Iyer Gas
 Hua Li Gas
 Gerry Yupp Power/Gas
 f Dunn Power
 Paul Zhang Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
- Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMTA	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	

48-16.7

FLUOR CORP or its
 Holding Audit
 Historical Test Ended July 31, 2016
 DM 160001-2, ACN 16-068-4-1
 Description: *Procure 2 6002*

CONFIDENTIAL

PBC
 SOURCE
 02/11

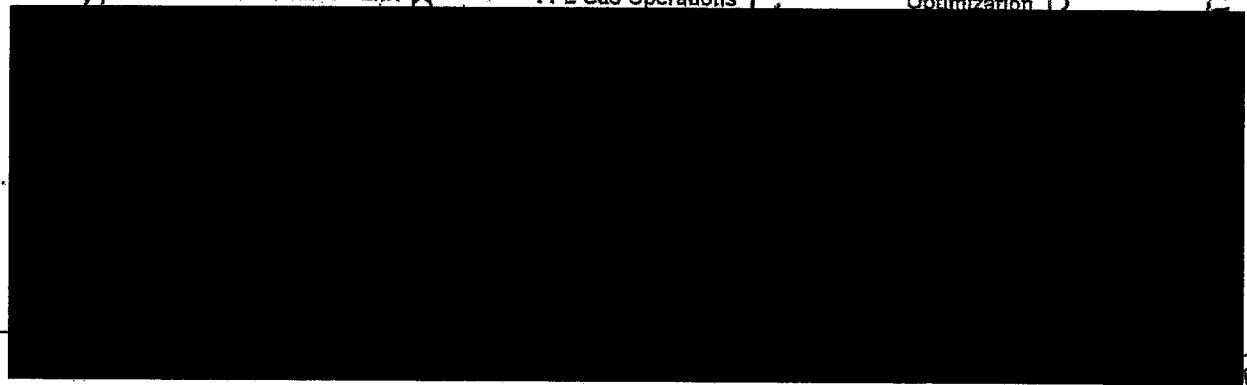
5/16
AD

Mar-16

Art Morris
Bill Miller
Shirley Steff
Bill Murphy
Mirfelys Nieto
Chuck Helber
Luther Hall
Jerry Hildreth
Raj Iyer
Hua Li
Gerry Yupp
ff Dunn
Caul Zhang

Gas
Gas
Gas
Gas
Optimization
Power/Optimization
Power
Optimization
Gas
Gas
Power/Gas
Power
Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	



48-16.8

EDWARDS & KELCEY LLP
Hedging Audit
Historical Test Year ended July 31, 2016
Dkt 160801-ELI ACN 16-068-4-1
Description: Software fees

CONFIDENTIAL



SOURCE: P211

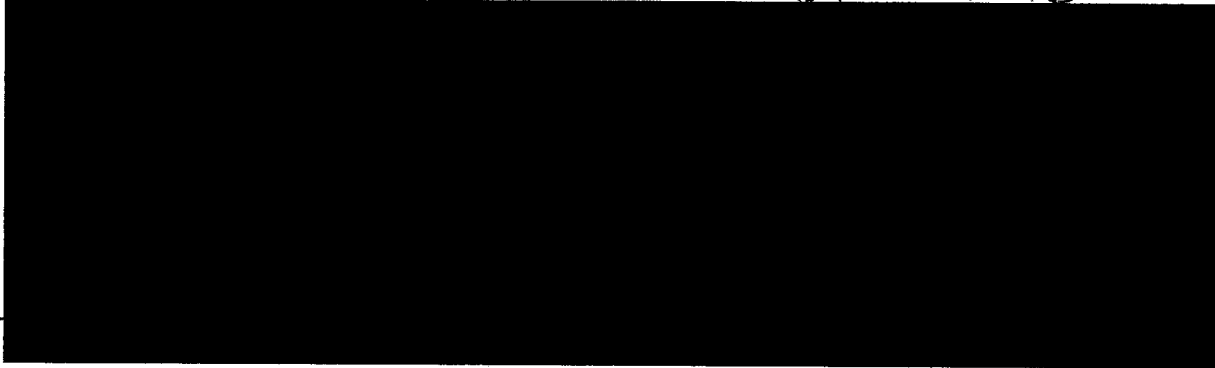
5/1/16
[Handwritten initials]

Apr-16

Art Morris
Bill Miller
Shirley Steff
Bill Murphy
Mirielys Nieto
Chuck Helber
Luther Hall
Jerry Hildreth
Raj Iyer
Hua Li
Gerry Yupp
f Dunn
Paul Zhang

Gas
Gas
Gas
Gas
Optimization
Power/Optimization
Power
Optimization
Gas
Gas
Power/Gas
Power
Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	E
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	



48-14.9

Florida Power & Light
Hedg Audit
Historical Test Year ended July 31, 2016
Dkt 160001-EE; ACN 16-068-4-1
Description: BAYBACOR FAS

CONFIDENTIAL

PBC
SOURCE
DR 11

8/1/16 AD

48-1610

May-16

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Hua Li	Gas
Gerry Yupp	Power/Gas
ff Dunn	Power
Paul Zhang	Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	TOTAL
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E



Hedging Audit
 Historical Test Year ended July 31, 2016
 Dkt 160001-EI, ACN 16-068-4-1
 Description: **PROCURERS ERS**

CONFIDENTIAL

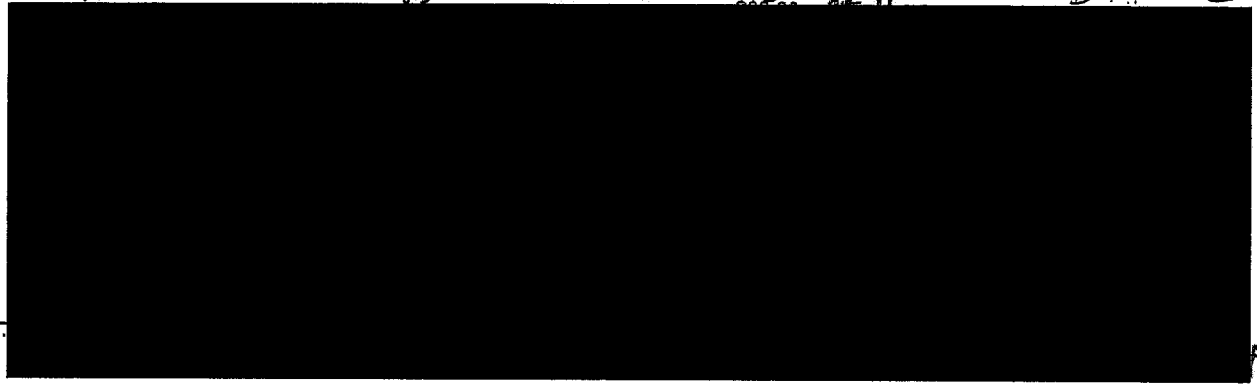
PBC SOURCE
 DRILL

1/16
8/14

Jun-16

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Heiber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer ✓	Gas
Hua Li	Gas
Gerry Yupp	Power/Gas
Jeff Dunn	Power
Caul Zhang ✓	Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMT <i>A</i>	Gas Purchases - EMT <i>B</i>	FPL Gas Operations <i>C</i>	Optimization <i>D</i>	



48-120.11

Florida Power & Light
 Accounting Audit
 Historical Test Period Ended July 31, 2016
 Dkt 160001-EF ACN 16-068-4-1
 Description: *Public Service*

CONFIDENTIAL

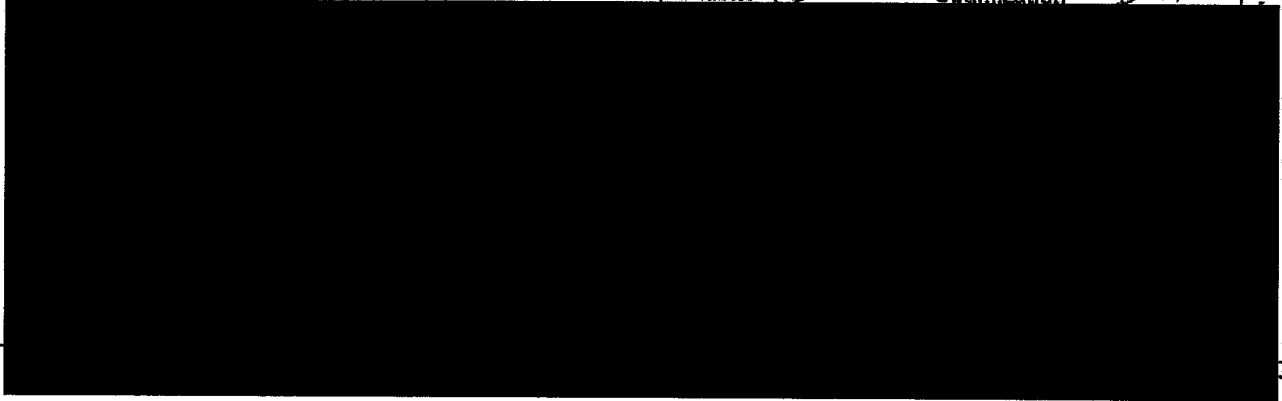
SOURCE PBC DRILL

1/15
8/15/16

Jul-16

Art Morris	Gas
Bill Miller	Gas
Shirley Steff	Gas
Bill Murphy	Gas
Mirielys Nieto	Optimization
Chuck Helber	Power/Optimization
Luther Hall	Power
Jerry Hildreth	Optimization
Raj Iyer	Gas
Hua Li	Gas
Gerry Yupp	Power/Gas
Dunn	Power
Zhang	Gas

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120007982	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	F
FPL Electricity - EMT A	Gas Purchases - EMT B	FPL Gas Operations C	Optimization D	E



AK-16012

Florida Power & Light
 Historical Test
 Dtd: 160001-EE; ACN 16-068-4-1
 Description: *Procurse fees*

CONFIDENTIAL

SOURCE DR11
 PBC

Hedging Audit
 Historical Test Year Ended July 31, 2016
 Dkt 160001-EL; ACN 16-068-4-1
 Description: Brothage See invoice

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 Page 1 of 1



Invoice

ICE US OTC Commodity Mkts LLC

Nextera Energy Resources
 Cost Center: 200010
 P.O. Box 88888
 N. PALM BEACH, FL 33408
 U.S.A.

Invoice Date : 08/01/2016
 Due Date : 08/31/2016
 Invoice No : 0716000193088
 Charge From : 07/01/2016
 Charge To : 07/31/2016
 Total Amount Due : [Redacted] *1*

Customer ID : 000193

Description	Currency	Amount
Minimum Commission Fees for REVENUE LINE	USD	[Redacted]
Minimum Commission Fees for REVENUE LINE	USD	[Redacted]
Sub Total :		[Redacted]
Sales/Excise Tax Total :		[Redacted]
Invoice Total :		<i>2 48-16.12</i>

CONFIDENTIAL

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

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

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

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

ICE US OTC Commodity Markets, LLC
 Wells Fargo
 Atlanta, GA 31193-5278
 [Redacted]
 0716000193088

Handwritten stamp
 SOURCE **PBC** *OR 11*

Questions? Email Accounting at iceaccounting@theice.com

Handwritten number
 48-16.12.1

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: FPL Hedging Audit
AUDIT CONTROL NO: 16-068-4-1
DOCKET NO: 160001-EI
DATE: September 14, 2016

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
2, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.9, 2.10, 2.11	March and August Filing	12	Y	Wps. 2 through 2.11, Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
48-1, 48-1.1, 48-1.2, 48-1.3, 48-1.4, 48-1.5, 48-1.6	Risk Management Plan	7	N Y N	Wps. 48-1 through 48-1.3 Wp. 48-1.4, Lines 1A, 4A, 11A, 12A, 14A Wp. 48-1.5, Lines 1A, 2A Wp. 48-1.6	(e)	G. Yupp
48-1.7, 48-1.8	Fuel Procurement-Policy & procedures	2	Y	ALL	(e)	G. Yupp
48-3	Sarbanes Oxley Process Narrative	1	Y	Lines 1A, 2 through 10	(e)	G. Yupp
48-4	Reconciliation to Filing	1	Y	Cols. A-E	(d), (e)	G. Yupp
48-5	FPL Counterparties	1	Y	Cols. A through F	(d), (e)	G. Yupp
48-6, 48-6.1, 48-6.2, 48-6.3, 48-6.4, 48-6.5, 48-6.6, 48-6.7, 48-6.8, 48-6.9, 48-6.10, 48-6.11, 48-6.12, 48-6.13, 48-6.14, 48-6.15, 48-6.16, 48-6.17, 48-6.18, 48-6.19, 48-6.20, 48-6.21	Derivative Reports	22	Y	ALL	(d), (e)	G. Yupp
48-7, 48-7.1, 48-7.2, 48-7.2.1, 48-7.3, 48-7.3.1, 48-7.4, 48-7.4.1	Tested Invoices/Purchase Statements	8	Y	Wp. 48-7, Col. A Col. B except line 1 Col. C Col D., Line 1 Col. E Line 2	(d)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
				<p>Wp. 48-7.1, Cols. A-B, Cols.C-G, lines 1-11 Col. H Cols. I-L, lines 1-11 Col. M Line 1 (subtotal figure)</p> <p>Wp. 48-7.2, Col. A, Lines 1-2 Cols. B-L</p> <p>Wp. 48-7.2.1, Col. A, Lines 1-2 Cols. B-I Col. J, Lines 1-7</p> <p>Wp. 48-7.3, Cols. A-E</p> <p>Wp. 48-7.3.1, Cols. A-H, Line 1</p> <p>Wp. 48-7.4, Col. A, lines 1-2 Cols. B-L</p> <p>Wp. 48-7.4.1,Cols. A, lines 1-2 Cols. B-J</p>		
48-7.2.2, 48-7.4.2	Gas Daily Support	2	N			
48-8, 48-8.1, 48-8.2, 48-8.3	Gas Closing Reports	4	Y	<p>Wp. 48-8, Cols. A-G Lines 1 and 2</p> <p>Wp. 48-8.1, Cols. A-F</p> <p>Wp. 48-8.2, Cols. A-G Lines 1 and 2</p> <p>Wp. 48-8.3, Cols. A-F</p>	(d), (e)	G. Yupp
48-9, 48-9.1, 48-9.2, 48-9.3, 48-9.4, 48-9.5	Planned Position Strategy	6	Y	ALL	(e)	G. Yupp
48-11, 48-11.1, 48-11.2, 48-11.3, 48-11.4, 48-11.5, 48-11.6, 48-11.7, 48-11.8, 48-11.9, 48-11.10, 48-11.12	Projected Burn	12	Y	ALL	(e)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
48-13, 48-13.1	Transaction Types and Cost	2	Y N	Wp. 48-13, Lines 1, 2A, 3, 4A Wp. 48-13.1	(d), (e)	G. Yupp
48-10, 48-15	Hedge versus Burn Schedule	2	Y N	Wp. 48-10, Cols. A-H Lines 1-2 Wp. 48-15	(d), (e)	G. Yupp
48-16, 48-16.1, 48-16.2, 48-16.3, 48-16.4, 48-16.5, 48-16.6, 48-16.7, 48-16.8, 48-16.9, 48-16.10, 48-16.11, 48-16.12, 48-16.12.1	Transaction Cost and Brokerage fees	14	Y	Wp. 48-16, Lines 1, 2A, 3, 4A Wps. 48-16.1 through 48-16.12, Cols. A-E Wp. 48-16.12.1, line 1 Col. B except line 2	(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)
)
PALM BEACH COUNTY)

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 declaration.

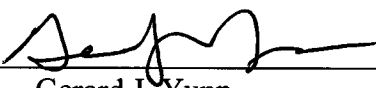
2. I have reviewed Exhibit C, and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information Obtained in Connection with Audit No. 16-068-4-1. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information, contain or constitute data pertinent to FPL's procurement activities and hedging program. The documents contain or constitute contractual data as pricing and other terms, which allow FPL to hedge its fuel purchases on favorable terms for FPL and its customers. The disclosure of this information would provide other market participants insight into FPL's marketing and trading practices, as well as internal policy and procedure that would allow them to anticipate FPL's marketing and trading decision, and/or impair FPL's ability to negotiate, to the detriment of FPL and its customers.

3. The documents or materials also contain or constitute information regarding physical and financial details related to FPL's annual hedging program for natural gas. The information contains monthly realized values for FPL's hedge positions and resulting impact on the cost of natural gas. The disclosure of this information would impair the efforts of FPL to contract for these procurement and hedging goods and services on favorable terms for the benefit of its customers, and would impair the competitive interests of FPL and its vendors. Disclosure of certain of the information would also place FPL at a competitive disadvantage when coupled with other information that is publicly available.

4. The documents or materials also contain the names of financial counterparties with which FPL executes hedging transactions. Due to the extremely limited population of potential counterparties that participate in this market, the disclosure of this data would harm the competitive business of FPL and impair the efforts of the company to contract for hedging instruments on favorable terms. Specifically, the disclosure of the names of certain financial counterparties would reveal transaction frequency and volume between FPL and those financial counterparties. This would harm FPL's efforts to contract with those financial counterparties on favorable terms in the future, to the detriment of FPL and its customers.

5. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 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.

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



Gerard J. Yupp