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July 28, 2021

**-VIA HAND DELIVERY -**

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

**REDACTED**

2021 JUL 28 PM 3:44  
RECEIVED-FPSC  
COMMISSION CLERK

**Re: Docket No. 20210001-EI**

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") First Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 2018-019-4-1. 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 consists of the declarations in support of FPL's Request for Confidential Classification.

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

COM \_\_\_\_\_  
AFD 1 Exh B  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
CLK \_\_\_\_\_

Sincerely,

s/ David M. Lee  
David M. Lee

Enclosure

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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No: 20210001-EI

Date: July 28, 2021

**FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST  
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF  
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2018-019-4-1**

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 First Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 2018-019-4-1 (“Confidential Information”). In support of this request, FPL states as follows:

1. On May 24, 2018, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D (“May 24, 2018 Request”). By Order No. PSC-2018-0381-CFO-EI, dated August 1, 2018 (“Order 0381”), the Commission granted FPL’s May 24, 2018 Request. FPL adopts and incorporates by reference the May 24, 2018 Request and Order 0381.

2. The period of confidential treatment granted by Order 0381 will soon expire. Some of the Confidential Information that was the subject of FPL’s May 24, 2018 Request and Order 0381 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

3. Included with this request are First Revised Exhibit A, First Revised Exhibit B, together with First Revised Exhibit C to reduce the number of pages for which confidential treatment is sought. FPL has identified in First Revised Exhibits A, B and C all the information

in work papers that warrants continued confidential treatment. First 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 declarants who support the requested classification.

4. Also included as First Revised Exhibit D are the declarations of Antonio Maceo and Gerard J. Yupp in support of this request.

5. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. 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.

6. As explained more fully in the declaration included as First Revised Exhibit D, certain documents contain information concerning internal auditing controls and reports of internal auditors. This information is protected by Section 366.093(3)(b), Fla. Stat.

7. As explained more fully in the declaration included as First Revised 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.

8. Also, certain documents contain information relating to 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.

9. Nothing has changed since the Commission entered Order 0381 to render the Confidential Information identified in First Revised Exhibit C stale or public, such that continued confidential treatment would not be appropriate.

10. Pursuant to Section 366.093(4), F.S., the information for which confidential classification is granted remains protected from disclosure up to 18 months unless good cause is shown to grant protection from disclosure for a longer period. Currently, the Commission retains audit reports for period of seven years at which time the audit materials are returned to FPL unless Commission staff or another affected person requests that these audit materials continue to be retained. The nature of these materials will not change in the next three years. Therefore, to promote administrative efficiency, FPL requests confidential classification for a period of thirty-six (36) months. 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 thirty-six (36) 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 included with or incorporated in this Request, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

David M. Lee  
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Juno Beach, FL 33408  
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Email: david.lee@fpl.com

By: s/ David M. Lee  
David M. Lee  
Florida Bar No. 103152

**CERTIFICATE OF SERVICE**  
**Docket No. 20210001-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished

by electronic service on this 28th day of July 2021 to the following:

Suzanne Brownless  
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**Florida Public Service Commission**  
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Tallahassee, Florida 32399-0850  
sbrownle@psc.state.fl.us

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**Attorneys for Nucor Steel Florida, Inc.**

By: s/ David M. Lee  
David M. Lee  
Florida Bar No. 103152

20210001-EI

FPL's First Request for Extension of Confidential  
Classification Audit No. 2018-019-4-1

EXHIBIT "B"

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 9**

**[Pages 1 through 2]**

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**LIST OF INTERNAL AUDITS**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 9.1**

**[Page 1]**

**NOTES**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 9.2**

**[Page 1]**

**NOTES**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 9.3**

**[Page 1]**

**NOTES**

*JEP*  
*4/18*

Title \_\_\_\_\_  
**Qualifying Facility Monthly Billing Statement**

	A	B	C
<b>Facility Name:</b>	BROWARD RESOURCE RECOVERY SOUTH		
<b>Region:</b>	Southeast		
<b>Billing Month:</b>	December, 2017		
<b>Number of Hours in Month:</b>	744		
<b>Number of Peak Hours in Month:</b>	248		
<b>Committed Capacity:</b>	3,500 MW		
<b>1 Energy Received, All Hours:</b>			
<b>2</b>			
<b>3 Energy Received, All Peak Hours:</b>			
<b>4</b>			
<b>5 Sales (Wheeled):</b>			
<b>6 Net Energy Received, All Hours:</b>			
<b>7 Maximum Hourly Energy:</b>			
<b>8 Committed Capacity:</b>			
<b>9 Monthly Billing Capacity Factor:</b>			
<b>10 Monthly Peak Capacity Factor:</b>			
<b>11 Annual Capacity Factor:</b>			
<b>12 Annual Peak Capacity Factor:</b>			
<b>13 Billing Capacity Factor:</b>			
<b>14 Unit Energy Cost:</b>			
<b>Monthly Energy Payment:</b>	(As Available)	('91)	Total
<b>15</b>			\$126,967.40
<b>Monthly Capacity Payment:</b>	+	(P1)	\$110,600.00
		=	\$110,600.00

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Execution Date/Time: 01/18/18 at 16:25:29  
 Invoice ID: 2869

SOURCE log 12

48-1 p 2

8/17/17

18-2-05

Title \_\_\_\_\_

Florida

	A	B	C	D	E	F	G	H	I
1	<b>ASSET OPTIMIZATION DETAIL</b>								
2	Actual for the Period of: January 2017 through December 2017								
3									
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	NOX	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Storage	AMA	Emissions	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Optimization	Gains	Sales	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
9									
10	January								1,032,914
11	February								1,168,100
12	March								1,120,311
13	April								1,121,805
14	May								1,975,985
15	June								1,656,384
16	July								1,744,266
17	August								2,069,815
18	September								1,851,678
19	October								1,220,333
20	November								1,417,614
21	December								2,383,608
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									
32									
33									
34	<b>Total</b>	3,638,237	602,559	3,217,971	8,946,076	861,359	1,478,429	119,180	18,762,809

PBC

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50

50

✓ agreed to offer detail capacity release transaction aid to F&T details for award # 57877

CONFIDENTIAL

CONFIDENTIAL

SRC: Reg 16

Docket No. 20180001-EI  
 Asset Optimization Detail  
 Exhibit GJY-1, Page 3 of 4

SOURCE

Month of April selected for tested - see references above.

SB-2 PL

Title \_\_\_\_\_

ASSET OPTIMIZATION DETAIL  
 Actual for the Period of: January 2017 through December 2017

PBC

8/1/17

(1) Month	(2) Natural Gas Delivered City-Gate Sales (\$) A	(3) Natural Gas Production Area Sales (\$) B	(4) Natural Gas Capacity Release Firm Transport (\$) C	(5) Natural Gas Option Premiums (\$) D	(6) Natural Gas Storage Optimization (\$) E	(7) Natural Gas AMA Gains (\$) F	(8) NOX Emissions Sales (\$) G	(9) Total Asset Optimization Gains (\$) H
January								1,032,914
February								1,168,100
March								1,120,311
April								1,121,805
May								1,975,988
June								1,656,384
July								1,744,266
August								2,069,816
September								1,851,578
October								1,220,333
November								1,417,814
December								2,383,603
Total								18,762,809

\*  
 See  
 Schedule

\*  
 See  
 Schedule

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 H

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 See  
 Schedule

\* I 50-2.5 J

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 See  
 GDDM PBC  
 Document

PBC

SOURCE Request 17

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.1**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.1.1**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.1.2**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.1.3**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.1.4**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.1.5**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.1.6**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.2**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.2.1**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.2.2**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.2.3**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.2.4**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.3**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.3.1**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.3.2**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.3.3**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.3.4**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.4**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.4.1**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.4.2**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.4.3**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.4.4**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.5**

**[Pages 1 through 2]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.5.1**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.5.2**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.5.3**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.5.4**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.5.5**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.5.6**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Fuel Audit Workpaper Number 50-2.5.7**

**[Page 1]**

**ASSET OPTIMIZATION DETAIL**

JAP  
4/18

**ENERGY MARKETING AND TRADING**  
**O&M EXPENSES - FUEL (A04)**  
**April-17**

Title \_\_\_\_\_

A

Account Group		Apr-17	
FPL Salaries & Wages	FPLGN1019		
FPL Labor Related Overheads	FPLGN1020		
Total FPL Labor	FPLGN1002		
Business Travel: Lodging	5600000		
Meals & Entertainment	5600100		
Business Travel: Air	5600200		
Business Travel: Car Rental	5600300		
Business Travel: Misc. Expenses	5600500		
Business Travel: Occasional Use Mileage	5600700		
Dues & Subscriptions	5610100	\$ 375	1) Line 1
Education & Training	5340000		
Total Employee Related Expenses	FPLGN1003		
Cellular Telephone and Pagers	FPLGN1032		
Total Telecommunications	FPLGN1032		
Office Supplies	5760300		
Total Office & Facilities Administration	FPLGRU10016		
Total ICE User Fees	5760220		
<b>Total Personnel Costs</b>		<b>\$ 33,413</b>	<b>Line 2</b>
Corporate Payroll	8110006		
NEER Payroll	8110059		
External Labor Overheads	FPLGRU10102		
Total External Labor	FPLGRU10100		
Outside Services - Temporary Labor	5750700		
Total Contractor & Professional Services	FPLGN1004		
Software Maintenance	5760210		
Software Purchases	Formula from above		2)
Total Software Expenditures			
Hardware Expenditures	FPLGRU100171		
Other Expenses	FPLGRU10018		
Total Other Expenses	FPLGRU10018		
<b>Total Other Expenditures</b>		<b>\$ 4,920</b>	<b>Line 3</b>
<b>Total</b>		<b>\$ 38,333</b>	<b>Line 4</b>

**CONFIDENTIAL**

**PBC**

RECAP:	Apr-17
Total Personnel Costs	\$ 33,413
Total Other Expenditures	\$ 4,920
Total O&M Expenses Fuel	\$ 38,333

$33,413 - 375 = 33,038$

- (1) Represents Dodd Frank Fees. - Dodd Frank Fees are captured separately by outside of the Optimization program. See A2
- (2) Software Purchases relate to the OATI project

\$ 33,038  
 \$ 4,920  
 \$ 37,958

50-3  
50-3

Request  
SOURCE 17

V-agreed to Payroll Recap coded as such.

50-3.1

JH  
9/18

Title \_\_\_\_\_

Counterparty  
Bay Gas Storage Company, Ltd. [BAY GAS]

A	B	C	D	E
Contract Month	Invoice	Counterparty	Volume (Signed)	Period-End Gain/Loss (Signed)

--	--	--	--	--

Grand Total

- Vendor = Bay Gas, Account = 5% to PERG 501110 as % to PBC 547110
- All expenses are related to firm gas storage only.

confidential

CONFIDENTIAL

PBC

Selected one mth

SI-1 → F Sum (A)  
Total 9/17 = [REDACTED]

Req 14

SOURCE \_\_\_\_\_



418

Title	29	[REDACTED]
	30	
	31	
	32	
	33	
	34	
	35	
	36	
	37	
	38	
	39	
40	Totals	

A2  
A3  
A4  
A5

Transaction Type Codes

06 Storage Injection	206 Storage Injection - Secondary	12 Authorized INJ Overrun	07 Storage Withdrawal	207 Storage Withdrawal - Secondary
13 Authorized WD Overrun	26 Park	27 Park WD		
28 Loan	29 Loan Payback	31 Meter Bounce		
132 Wheel	11 Storage Inventory Transfer (Dome Swap)			
71 Hub Sell	72 Hub Buy			
73 Wheel To Hub	74 Wheel From Hub			
75 Storage To Hub	76 Hub To Storage			

CONFIDENTIAL

Storage Activity Summary

Beginning Balance				
Injections				
Fuel Loss on Injections				
Withdrawals				
Fuel Loss on Withdrawals				
Inventory Adjustments				
Dome Swaps				
Ending Balance				

PBC

A

Svc Req K Totals

Line No	Item	B Quantity	C Unit Price	D Amt Due
1	Monthly Storage Rate Fee			
2	Total Transaction Rate Fee			
3	Total Transportation Rate Fee			
Invoice Total Amount				

5

✓ agreed to Amendment to 2 to Firm Storage Service Agreement.

7/1/17  
 4/18

Title

SUPPLIER NAME	QNTY (MMBTU)	UNIT PRICE (\$/MMBTU)	INVOICE AMT (\$)	COMMENTS
1 BP Energy Company				
2 Castleton Commodities Merchant				
3 City of Lakeland				
4 ConocoPhillips				
5 Continental Resources				
6 Devon Gas Services				
7 Direct Energy Business Marketing				
8 DTG Energy Trading				
9 EPF Trading				
10 EnCana Marketing				
11 Enl Trading & Shipping				
12 Enstor Energy Services				
13 Entorplex Products				
14 EOG Resources				
15 EQT Energy				
16 Exelon Generation				
17 Houston Pipe Line				
18 Indigo Minerals				
19 JERA Energy America				
20 Marquette Energy				
21 Mercutio Energy				
22 Mitsui & Co.				
23 NJR Energy Services				
24 Noble Energy Inc				
26 People Gas				
26 Range Resources				
27 Seminole Electric Cooperative				
28 Sempra Gas & Power Marketing				
29 Sequent Energy				
30 Shell Energy North America				
31 Spke Marketing, Inc.				
32 Targas Gas Marketing				
33 Tonaska Marketing				
34 Tuxia Energy				
35 Trillstone NA Logistics				
36 XTO Energy				

PBC

CONFIDENTIAL

CONFIDENTIAL

Adj: between Proc and Opt

BAY GAS STORAGE - APR PROCUREMENT ACTIVITY

BAY GAS STORAGE - APR OPTI ACTIVITY

TOTAL - SUPPLY 56,614,816 3.0881 \$ 174,032,252.54

April-2017

TRANSPORT TYPE & CONTRACT NUMBER	QNTY (MMBTU)	(\$/MMBTU)	INVOICE AMT (\$)	COMMENTS
FOT - FTS2 RESERVATION CHARGE (#3023)	7,124,621	0.6516	10,930,846.60	FTS2 - FIRM TRANSPORT 10/1/09 thru 02/28/2026
FOT - FTS2 USAGE CHARGE (#3123)	13,458,428.00	0.0200	269,168.93	FTS2 - FIRM TRANSPORT 10/1/09 thru 02/28/2026
FOT - FTS1 RESERVATION CHARGE (#3217)	2,557,660	0.6516	1,665,120.00	FTS1 - FIRM TRANSPORT 1/10/09 thru 07/31/2025
FOT - FTS1 USAGE CHARGE (#3247)	5,940,364.00	0.0202	141,003.26	FTS1 - FIRM TRANSPORT 1/10/09 thru 07/31/2025
FOT - FTS2 USAGE CHARGE (#)		#01V01		
FOT - FTS3 RESERVATION (#1111-10)	12,000,000	1.1780	14,100,000.00	Contract Term - Effective 4/1/11 for 25 years.
FOT - FTS3 USAGE CHARGE (#1111-10)	11,882,492.00	0.604	45,922.79	Contract Term - Effective 4/1/11 for 25 years.
FOT - FTS3 RESERVATION (#112233)	3,000,000	1.200	3,600,000.00	Contract Term - April only
FOT - FTS3 USAGE CHARGE (#112233)	2,141,637.00	0.007	19,606.61	Contract Term - April only
GULF SOUTH PIPELINE RESERVATION CHARGE (#14001)	4,350,000	0.1300	565,500.00	Apr thru Oct Only - Through 2017
GULF SOUTH PIPELINE USAGE CHARGE (#14001)	4,349,010	0.1330	60,026.76	Apr thru Oct Only - Through 2017
GULF SOUTH PIPELINE RESERVATION CHARGE (#11015)	3,000,000	0.2374	712,200.00	Contract Term Apr 1, 2015 through Mar 31, 2025
GULF SOUTH PIPELINE USAGE CHARGE (#11015)		#01V01		
GULF SOUTH PIPELINE RESERVATION CHARGE (#11018)	3,000,000	0.1600	540,000.00	Contract Term Apr 1, 2015 through Mar 31, 2025
GULF SOUTH PIPELINE USAGE CHARGE (#11018)		#01V01		
GULF SOUTH PIPELINE RESERVATION CHARGE (#11019)	2,997,662.00	0.1065	31,732.87	Contract Term Apr 1, 2015 through Mar 31, 2025
GULF SOUTH PIPELINE USAGE CHARGE (#11019)	603,000	0.0200	12,000.00	Contract Term Apr 1, 2015 through Mar 31, 2025
GULF SOUTH PIPELINE RESERVATION CHARGE (#11019)		#01V01		
GULF SOUTH PIPELINE USAGE CHARGE (#11019)	10,500,000	0.5500	5,775,000.00	Contract Term June 1 2005 through June 2025
GULFSTREAM RESERVATION CHARGE (#0000102)	9,791,637.00	0.0068	66,641.49	Firm Transport per Gulfstream Transportation Journal
GULFSTREAM USAGE CHARGE (#0000102)	10,350,000	0.6700	6,934,500.00	Contract Term Feb 8, 2008 through Oct 01, 2032
GULFSTREAM RESERVATION CHARGE (#0000111)	10,117,479.00	0.0068	68,792.86	Contract Term Feb 8, 2008 through Oct 01, 2032
GULFSTREAM USAGE CHARGE (#0000111)	12,000,000	0.2750	3,300,000.00	Contract Term Sep 8, 2008 through Sep 5, 2020
BESH RESERVATION CHARGE (#140001)	10,284,604.00	0.0083	85,474.25	Contract Term Sep 8, 2008 through Sep 5, 2020
BESH USAGE CHARGE (#140001)	3,000,000	0.2750	825,000.00	Contract Term Sep 8, 2008 through Sep 5, 2020
BESH RESERVATION CHARGE (#140002)	2,945,541.00	0.0083	24,459.21	Contract Term Sep 8, 2008 through Sep 5, 2020
BESH USAGE CHARGE (#140002)	60,000	0.3618	21,690.00	Contract Term Jan 1, 2012 through Dec 31, 2017
BESH RESERVATION CHARGE (#140003)		#01V01		
BESH USAGE CHARGE (#140003)	3,646,000	0.0092	33,192.70	
TRANSCONTINENTAL RESERVATION CHARGE (#111330)	2,484,932	0.0061	15,145.10	
TRANSCONTINENTAL USAGE CHARGE (#111330)				
REBUNDLED - FOT				REBUNDLED FIRM TRANSPORT
Imbalance - Gulfstream				REBUNDLED FIRM TRANSPORT

BAY GAS STORAGE (Monthly Charge on 2.5 MM Capacity Including)	QNTY (MMBTU)	UNIT PRICE (\$/MMBTU)	INVOICE AMT (\$)
FOT - Turkey Point Compressor Station #22	0	0.0000	323,462.57
FOT - Cape Canaveral Compressor Station #32	0	0.0000	177,657.49
FOT - Pompano Beach Compressor Station #21.6	0	0.0000	286,135.38

Less: PPA Transportation (December Year-2) 0.0000 \$

TOTAL 3

✓ - agreed to Invoice + Richard start.

o - Agreed tariff rate on invoice to " FOT, System Transportation Bill

SOURCE 1/22/2017 15

ie 53

**FIRST REVISED EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Workpapers  
**AUDIT:** FPL, Fuel Audit  
**AUDIT CONTROL NO:** 2018-019-4-1  
**DOCKET NO:** 20210001-EI  
**DATE:** July 28, 2021

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

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
9	LIST OF INTERNAL AUDITS	2	Y	ALL	(b)	A. Maceo
9-1	NOTES	1	Y	ALL	(b)	A. Maceo
9-2	NOTES	1	Y	ALL	(b)	A. Maceo
9-3	NOTES	1	Y	ALL	(b)	A. Maceo
43-1	SAMPLE	1	N			
43-1.1	FUEL REQUISITION	1	N			
43-1.2	FUEL RECEIPTS	1	N			
43-2	SAMPLE	1	N			
43-2.1	GAS RECEIVING REPORT	1	N			
43-2.2	GAS COMPUTATION REPORT	1	N			
43-2.3	GAS PRICE COMPUTATIONS	1	N			
43-5	FILE OF FUEL TRANSACTIONS	1	N			
43-5.1	FUEL USED RECONCILIATION	1	N			
44-1	SCHEDULE A NOTES	1	N			
44-2	FUEL INVENTORY	1	N			
44-2.1	INVENTORY RECONCILIATION	1	N			
44-2.2	INVENTORY RECONCILIATION	1	N			
44-2.3	FUEL REQUISITION	2	N			
44-3	ADJUSTMENT	1	N			
44-3.1	COAL INVENTORY	1	N			
45-1	INVENTORY ANALYSIS	2	N			
45-2	OIL PURCHASES	1	N			
45-2.1	FOSSIL FUEL INVENTORY	1	N			
45-3	SJRPP	1	N			
45-4	SCHERER	1	N			
45-8	FORM 423-2	1	N			
45-9	LFARS FUEL USED	2	N			
46-1	TRANS SERVICE	1	N			
46-1.1	DEAL JOURNAL	1	N			
46-2	PURCHASE STATEMENT	3	N			
46-2.1	DEAL INFORMATION	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
46-2.2	DEAL INFORMATION	1	N			
46-3	INVOICE	14	N			
46-4	INVOICE	1	N			
47-1	BILLING SUMMARY	1	N			
47-1.1	BILLING SUMMARY	1	N			
47-1.2	BILLING SUMMARY	1	N			
47-1.3	BILLING STATEMENT	1	N			
47-1.4	BILLING STATEMENT	1	N			
47-2	INVOICE	1	N			
47-2.1	BILLING REPORT	1	N			
47-2.2	SJRPP REPORT	1	N			
47-2.3	INVOICE	1	N			
47-2.4	BILLING REPORT	1	N			
47-2.5	SALEBACK BILLING	1	N			
47-2.6	PURCHASES	1	N			
47-2.7	INVOICE	1	N			
47-3	CONTRACT REVIEW	1	N			
48-1 p.2	BILLING STATEMENT	1	Y	Col. A, Lns. 1-15 Col. B, Lns. 1-4, 7, 14 and 15 Col. C, Lns. 1-4	(d), (e)	G. Yupp
48-1.1	BILLING STATEMENT	1	N			
48-1.2	BILLING STATEMENT	1	N			
48-2 p. 2	BILLING STATEMENT	1	N			
48-2.1	BILLING STATEMENT	1	N			
48-2.2	BILLING STATEMENT	1	N			
48-2.2.1	MONTHLY BILLING STATEMENT	1	N			
48-2.2.2	DAILY ENERGY PAYMENT SUMMARY	1	N			
48-2.2.3	HOURLY AS AVAILABLE ENERGY PAYMENT	1	N			
48-4	TARIFF	1	N			
50-2	ASSET OPTIMIZATION DETAIL	2	Y	Pg. 1, Cols. B-H, Lns. 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32  Pg. 2, Cols. A-J	(e)	G. Yupp
50-2.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.5	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.1.6	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
50-2.2.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.2.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.2.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.2.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.3.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.3.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.3.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.3.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.4.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.4.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.4.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.4.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5	ASSET OPTIMIZATION DETAIL	2	Y	ALL	(d), (e)	G. Yupp
50-2.5.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.5	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.6	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-2.5.7	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	G. Yupp
50-3.1	INCREMENTAL OPTIMIZATION COSTS	1	Y	Col. A, except Line 1, Line 2, Line 3, Line 4	(e)	G. Yupp
51	INVOICE LIST	1	Y	Cols. A-F	(d), (e)	G. Yupp
51-1	INVOICE	2	Y	Pg. 1, Cols. A-C Lns. 1-28  Pg. 2, Lns. 29-40 Cols. A-D	(d), (e)	G. Yupp

<b>Workpaper No.</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf Y/N</b>	<b>Column No./Line No.</b>	<b>Florida Statute 366.093 (3) Subsection</b>	<b>Declarant</b>
53	GAS REPORT	1	Y	Cols. A-C Lns. 1-3	(d), (e)	G. Yupp
53-1	PURCHASE STATEMENT	2	N			
53-2	INVOICE	1	N			
53-3	INVOICE	1	N			
53-4	RATE SCHEDULE	1	N			
53-5	INVOICE EXPLANATION	2	N			

**FIRST 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. 20210001-EI

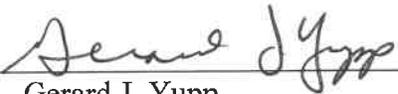
**DECLARATION OF GERARD J. YUPP**

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

2. I have reviewed Exhibit C and the documents that are included in Exhibit A to FPL’s First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 2018-019-4-1 for which I am identified as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute data such as pricing and other terms, payment records, and vendor and supplier rates. Specifically, the documents include information related to the purchase or sale of energy and capacity, natural gas, and natural gas storage. The disclosure of this information would impair the efforts of FPL to contract for energy and capacity-related goods or services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain 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.

3. Nothing has occurred since the issuance of Order No. PSC-2018-0381-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 not less than 36 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

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

  
\_\_\_\_\_  
Gerard J. Yupp

Date: 7/26/21

**FIRST 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: 20210001-EI

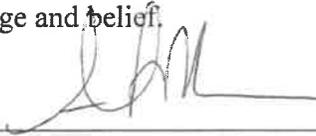
**DECLARATION OF ANTONIO MACEO**

1. My name is Antonio Maceo. I am currently employed by Florida Power & Light Company ("FPL") as Senior Manager, Internal Auditing. 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 First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 2018-019-4-1 for which I am identified as the declarant. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, contain or constitute internal auditing controls, reports or notes of internal auditors, or information relating to internal auditing reports issued in 2017. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing scope, process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may impact the effectiveness of the Internal Auditing department itself. 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-2018-0381-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 not less than 36 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.

  
\_\_\_\_\_  
Antonio Maceo

Date: 7/27/21