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(561) 691-7135 (Facsimile)
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March 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 MAR 14 PM 2:25
COMMISSION
CLERK

Re: Docket No. 160001-EI

REDACTED

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") First Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 14-083-4-1. The request includes First Revised Exhibits A, B (two copies), C and D.

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

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

Sincerely,

Maria J. Moncada

Enclosure

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

3841558

COM _____
AFD _____
APA Redacted
ECO _____
ENG _____
GCL _____
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: March 14, 2016

**FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 14-083-4-1**

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. 14-083-4-1 ("Confidential Information"). In support of this request, FPL states as follows:

1. On September 26, 2014 FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("September 26, 2014 Request"). By Order No. PSC-14-0560-CFO-EI, dated October 10, 2014 ("Order 0560"), the Commission granted FPL's September 26, 2014 Request. FPL adopts and incorporates by reference the September 26, 2014 Request and Order 0560.

2. The period of confidential treatment granted by Order 0560 will soon expire. Some of the Confidential Information that was the subject of FPL's September 26, 2014 Request and Order 0560 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 herewith and made a part hereof 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.

4. First Revised Exhibits A and B consist of highlighted and redacted copies of the specific working papers where FPL has determined that a portion of the information previously

designated as confidential requires continued confidential treatment. Where entire pages of a working paper are confidential, FPL has included only identifying cover pages in First Revised Exhibit B.

5. 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 affiants who support the requested classification.

6. First Revised Exhibit D consists of the declarations of Gerard J. Yupp, William Scott Seeley and Antonio Maceo in support of this request.

7. 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.

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

9. Additionally, 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.

10. Also, certain information in these documents and materials concern the competitive interests of FPL or third parties, the disclosure of which would impair the

competitive business of FPL and the third parties. This information is protected by Section 366.093(3)(e), Fla. Stat.

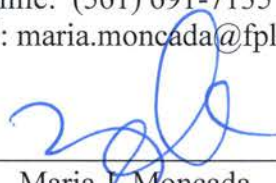
11. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

John T. Butler
Assistant General Counsel - Regulatory
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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 First Request for Extension of Confidential Classification* has been furnished by electronic service on this 14th day of March 2016 to the following:

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Maria J. Moncada

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

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

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A	B	C	D	E	F
		FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
August-2013	FIXED PRICE TRANSACTIONS SWAPS SWING SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			

4/3-1

*Pgs 1-16 pertain to Jan - July 2013
which were tested in the last audit
130001 - Hedging Activities*



SOURCE Aug. 4

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2-1 p1

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A	B
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September-2013	FIXED PRICE TRANSACTIONS SWAPS SWING SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES

C	D	E	F
FPL NATURAL GAS PROCUREMENT			
VOLUME (MMBTU)			
PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)



SOURCE Req. 4



JLP

2-1 p3

2/19/14

Florida Power & Light Company
Hedging Activities
DK# 140001-EI, ACN 14-083-4-1
TYE 7/31/14


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PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
October-2013	FIXED PRICE TRANSACTIONS SWAPS SWING SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES				

SOURCE Req. 4



GJY-2
Docket No. 140001-EI
FPL Witness: Gerard J. Yupp
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March 28, 2014

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2-1 p5


Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
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PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
November-2013	FIXED PRICE TRANSACTIONS				
	SWAPS				
	SWING SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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SOURCE Req 4

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27 p7

2/1/14

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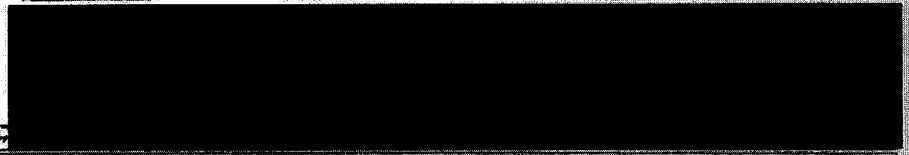
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PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
December-2013	FIXED PRICE TRANSACTIONS				
	SWAPS				
	SWING SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				



SOURCE Req 4

2/19/9

2-1 p9

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Title Films

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		FPL NATURAL GAS PROCUREMENT			
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PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
YEAR-TO-DATE (JAN - JULY) 2014	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			[REDACTED]
		<i>b1</i>			<i>43</i> 131,436,091
AVERAGE PERIOD OF HEDGE (Days) - FINANCIAL		[REDACTED]			



8/13

2-2 p1

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Florida Power & Light Company
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January-2014	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			



12/2/14

CONFIDENTIAL HEDGING AUDIT REQUEST NO.16

SOURCE _____

GJY-4
Docket No. 140001-EI
FPL Witness: Gerard J. Yupp
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2-2 p2

Florida Power & Light Company
Hedging Activities
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PERIOD INSTRUMENT
February-2014 FIXED PRICE TRANSACTIONS
SWAPS
OVER-THE-COUNTER OPTIONS
BROKER FEES

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FPL NATURAL GAS PROCUREMENT
VOLUME (MMBTU)
PURCHASES SALES OPTION PREMIUMS SAVINGS/(COSTS)

42
[REDACTED]



GJY-4
Docket No. 140001-EI
FPL Witness: Gerard J. Yupp
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August 13, 2014

SOURCE _____
CONFIDENTIAL HEDGING AUDIT REQUEST NO.16

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Florida Power & Light Company
Hedging Activities
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March-2014	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			



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~~CONFIDENTIAL~~ HEDGING AUDIT REQUEST NO.16

GJY-4
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FPL Witness: Gerard J. Yupp
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Florida Power & Light Company
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Dkt# 140001-EI, ACN 14-083-4-1
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PERIOD	INSTRUMENT	FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)		OPTION PREMIUMS	SAVINGS/(COSTS)
		PURCHASES	SALES		
April-2014	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES				

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SOURCE CONFIDENTIAL HEDGING AUDIT REQUEST NO.16

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FPL Witness: Gerard J. Yupp
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Florida Power & Light Company
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<u>PERIOD</u>	<u>INSTRUMENT</u>
May-2014	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES

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FPL NATURAL GAS PROCUREMENT			
VOLUME (MMBTU)			
<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>



2-2-14

CONFIDENTIAL HEDGING AUDIT REQUEST NO.16

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Docket No. 140001-EI
FPL Witness: Gerard J. Yupp
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		FPL NATURAL GAS PROCUREMENT			
		VOLUME (MMBTU)			
PERIOD	INSTRUMENT	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
June-2014	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			

2-20



CONFIDENTIAL HEDGING AUDIT REQUEST NO.16
SOURCE

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FPL Witness: Gerard J. Yupp
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		VOLUME (MMBTU)			
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July-2014	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES'	[REDACTED]			



JYP

22 p8

22 p8

FPL B of D Minutes - 2013 **CONFIDENTIAL**

8/12

3/4/13 - Unanimous consent of B of D in lieu of meeting. 9/1/13

Higgins, VP, Tax resigns 3/15/13.

Appoint's Brian R Murphy.

Signed by Lewis Hay
M. Dewhurst
J. Robo
A. Rodriguez
E. Sifasth.

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Title Board of Dir. Notes

3/14/13 Unanimous consent of directors in lieu of meeting.

FPL enters a short-term loan Ag. with Sun Trust - 7 mth term, \$500M for general corporate business purposes. Term permitted by FPSC financing order. signed same as above.

3/15/13 Effective 3/16/13 - James P Higgins resigns of VP - Tax FPL.

3/17/13 Effective 3/22/13 - Timothy Fitzpatrick resigns - VP Marketing & Communication.

3/21/13

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3/21/13

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4/24/13

Unanimous consent of directors in lieu of meeting
FPL enters revolving credit Agreement

SOURCE 09/13 2013 Global Revolver - commi to \$500M and max elect up to \$750M signed same as 3/14/13

CONFIDENTIAL

JAP
8/14
9/1/14

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Title Board of Directors
Notes

4/29/13 - Unanimous written consent of BoD in lieu of meeting.

change title - G Keith Hardy - V.P.

Manuel Miranda - VP, Power Delivery.

Deborah Kaplan EVP, Human Res.

Apparent - Michael G Spoor - VP Trans + Subs.
Signed same as 3/14/14

5/13/13

unanimous consent of Property Release Committee.
release lien from Co's mortgage + deed trust.

St Johns County # 947-R-08

5/13/13

Annual Appointment of Assistant officers
signed by J. Rabo. Chairman of Board, CEO

5/31/13

written consent of sole shareholder in lieu of annual meeting.

Directors
Lewis Hay
Moray Dechurst
James Rabo
Antonio Rodriguez
Eric Silafy

signed by J. Rabo, Pres CEO

6/12/13

Appoints all other officers.
signed by same as 5/31/13

6/16/13

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

[REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

SOURCE Reg-13

(revised 6/13)

18 p2

CONFIDENTIAL

2/11/14

6/19/13 - unanimous consent of Property Release Committee

Brevard County # 949-R-709

Dade County # 950-R-710

Broward County # 951-R-711

7/14/13 - Broward County # 952-R-712

sited by DeWurst, Rabin, Siloff.

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Title Board of Directors Notes

7/31/13 unanimous consent of Directors in lieu of meeting.

- 1 [REDACTED]
- 2 [REDACTED]
- 3 [REDACTED]
- 4 [REDACTED]
- 5 [REDACTED]

sited same as 7/14/13.

9/4/13 - unanimous consent of directors in lieu of meeting.

- 6 [REDACTED]
- 7 [REDACTED]
- 8 [REDACTED]
- 9 [REDACTED]
- 10 [REDACTED]
- 11 [REDACTED]
- 12 [REDACTED]
- 13 [REDACTED]
- 14 [REDACTED]
- 15 [REDACTED]
- 16 [REDACTED]

9/30/13 [REDACTED]

18 [REDACTED]

SOURCE Reg 13

19 [REDACTED]

CONFIDENTIAL

9/14/14
8/14

12/10/13 Title Board of Dire Notes
Resignation from subsidiary Board position

Lewis Hay - effective 12/31/13.

12/13/13 - written consent of directors in lieu of meeting.

Resolved following the resignations of
Mr. Hay + Mr Rodriguez from the Board,
of directors shall be fixed at 3.
(signed by all 5)

12/20/13 - Resignation from subsidiary Board Position

Antonio Rodriguez - effective 12/31/13.

12/31/13 written consent of the Foundation Contribution
Committee.

- 1 [REDACTED]
- 2 [REDACTED]
- 3 [REDACTED]
- 4 [REDACTED]
- 5 [REDACTED]
- 6 [REDACTED]

CONFIDENTIAL

PRH - B of D Minutes - 2014

JALP
8/14

Florida Power & Light Company
Hedging Activities
DK# 140001-EL ACN 14-083-4-1
TYE 7/8/14

Title Board of Directors Notes

1/14/14 - Unanimous written consent of B of D in lieu of meeting.
Egale 1/14/14 Antonio Rodriguez title is changed to Executive VP - Transition.
same - Miguel Archabalala appointed as Executive VP - Power Generation.
same - Mark E. Hickson appointed as VP - strategy + Corp development.

Signed James L Robo
Moray Deanehurst
Eric Slagoff.

1/31/14 - Unanimous written consent...
Effective 12/28/13 - Graef Ancaris title to VP President, Power Generation Technical Sys.
same - Thomas F Broad appointed as VP Eng & Const.

Signed - same as 1/31/14.

2/11/14 Appointment of Assistant Officer

Appoint Daniel Lafano as Ass. Treasurer.
Signed by James L Robo.

2/25/14 signed same as 1/14/14.
Unanimous consent of Directors in lieu of meeting.
Release of Leal - Palm Beach County.
951-12-719, 953-12-713.

3/10/14 -
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SOURCE Reg 13

Title Board of Directors
Notes

3/16/14 Unanimous consent of directors in lieu of meeting
release from lien of the Co's Mortgage + Deed of Trust
placed in Broward County #. 960-R-720
Palm Beach. 960 R 721

CONFIDENTIAL

29
8/

signed - same as 1/14/14

- 4/1/14 1 [REDACTED]
- 2 [REDACTED]
- 3 [REDACTED]
- 4 [REDACTED]
- 5 [REDACTED]

4/7/14. Unanimous written consent of Bd of D in lieu of meeting.
Appoint Ken Hoffmar - VP Regulatory Affairs.
Michael Solo VP State Gov Affairs.
Scott Seely Asst Secretary.
signed - same as 1/14/14.

4/25/14 Unanimous consent of Directors in lieu of meeting.
release from lien of Mtg + Deed of Trust.
Nassau County - # 963-R-723
Dade County 964-R-724
5/1/14 → Dade County - 965-R-725
signed same as 1/14/14.

5/19/14 Unanimous consent of Directors in lieu of meeting.
Agreement of purchase 4/21/14 - Letter Agreement.
FPL sells former letter power plant property
(70 acres) to Standard Pacific of FL.
Board authorizes + confirms the execution.
signed same as 1/14/14

5/28/14 written consent of solo shareholder in lieu of annual
meeting.
Elect directors Moray Dewhurst
James Robo
Eric Silafny

SOURCE Reg 13 signed by Robo - Chairman of the Board, Pres
CEO

Title Board of Directors Notes

5/28/14 Annual Appearance of Assistant officer **CONFIDENTIAL**
signed by J. Robo.

JHP
8/14
9/14

5/30/14 unanimous written consent of directors in lieu of meeting.
Appointment of other officers.
signed same as 1/14/14

6/4/14 release from lien of Mtg + Deed of trust.
Broward County Parcel Release # 967-R-726.
signed same as 1/14/14

6/20/14. 1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]

7/21/14 Unanimous consent of directors in lieu of meeting.
Release of lien - St. John County # 968-R-727
signed same as 1/14/14 Broward County # 969-R-728
Lee County # 970-R-729

8/11/14 Notice of Resignation -
Resignation of Daniel Lotano as Asst Treasurer.
effective 8/11/14.

SOURCE Reg 13

Florida Power & Light Company
Hedging Activities
DK# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Title Board of Directors Notes

CONFIDENTIAL

nitrogen dioxide std. reported options discussions with FEPA and management recommendation to replace the units with new advanced and efficient combustion turbines. Board approved this proposal.

9/11/13 JH/SH

Discussed RFP for a new gas pipeline connection central hub Orlando and FPL's Mother Plant (Southern Project). Board approved development, construction and operation of this Project.

7/26/13

Mr Gilroy - Highland FPL safety + customer satisfaction performance, the 2013 hurricane season, and Tropical Storm Andrea. Also demolition of Pensacola plant

10/8/13

Mr Deubert - discussed EPS - earnings per share and ytd shareholder return for industry.

Mr Gilroy - Discussed 2 new apps to FERC status of appeal regarding rate case settlement. Also update on gas pipeline project. Mr Fokes reports on finance + Inv committee reports and the issuing of \$1 billion CS, general authorization of up to \$4 Billion of securities by NE Energy + NE Energy Capital. (1 billion part of this)

10/25/13

1
2



SOURCE: Box 13

Title Board of Dir. notes

CONFIDENTIAL

Next Era Energy, Inc.

Minutes of meeting of Finance + Inv.
Committee.

attch JHP
elid

10/17/2013 - overall review of Co's process
for managing risk.

Next Audit -
Obtain EMC
report for
review.

Review annual report of
Enterprise Management Committee (EMC).
Discussed Risk Management 2013
projects + initiatives.
Completed the EMC report by
noting the EMC conclusion that
existing risk management controls
are effective.

Discussed that the use of derivatives
was similar to that of previous
years.

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]

12/12/13. Summary of 2013 financing plan.
Complete equity offering in 11/13.
Reviewed 2014 financing plan.

2/13/14 overall financial update for 2013.

SOURCE Reg 13

Title Board of Director Notes

CONFIDENTIAL

NexEra Energy, Inc - Minutes of meeting of
Nuclear Committee

9/14/14 JHP
8/14

3/8/13

1

2

3

Major - current perf of TP regarding
and EPU outage.

4

5

Mr Jones - EPU status - SL/TP

6

7

6/4/13 - Mr Jones - Overall SH performance.
Kiley - TP4 regarding + EPU.
Curtland - nuclear plant reactor
+ EPU

10/16/13 8

9

10

12/11/13 11

12

Mr. Jones - insights/lessons learned from
SL-1 regarding

3/2/14 - 13

14

15

16

17

ENCLOSURE Reg 13

per Jack had no other minutes
after 3/2/14

Title Internal Audit List

2014 AUDIT REPORTS

PSC Request #

January through July 28, 2014
to date



JHP
8/14
9/14/14

A

1.	[REDACTED]	1/7/14
2.	[REDACTED]	2/4/14
3.	[REDACTED]	2/5/14
4.	[REDACTED]	2/11/14
5.	[REDACTED]	2/11/14
6.	[REDACTED]	2/11/14
7.	[REDACTED]	2/11/14
8.	[REDACTED]	2/13/14
9.	[REDACTED]	2/24/14
10.	[REDACTED]	3/5/14
11.	[REDACTED]	3/6/14
12.	[REDACTED]	3/17/14
13.	[REDACTED]	3/31/14
14.	[REDACTED]	4/4/14
15.	[REDACTED]	4/10/14
16.	[REDACTED]	4/17/14
17.	[REDACTED]	4/17/14
18.	[REDACTED]	4/22/14
19.	[REDACTED]	4/28/14
20.	[REDACTED]	5/6/14

CONFIDENTIAL

9-1 }
}

9-2

9-3

9-4

9-4

20a [REDACTED]
20b SOURCE [REDACTED] **CONFIDENTIAL HEDGING AUDIT REQUEST NO. 2, ITEM #2**
20c [REDACTED] 7/28 *9p*

Title Internal Audit List

PSC REQUEST NO. 2 (CONT...)
PAGE 2 OF 2



9/14/14 ZHP

A

9-5

9-6

21.	[REDACTED]	5/14/14
22.	[REDACTED]	5/28/14
23.	[REDACTED]	6/2/14
24.	[REDACTED]	6/6/14
25.	[REDACTED]	6/12/14
26.	[REDACTED]	6/18/14
27.	[REDACTED]	6/23/14
28.	[REDACTED]	6/25/14
29.	[REDACTED]	6/25/14
30.	[REDACTED]	6/26/14
31.	[REDACTED]	6/26/14
32.	[REDACTED]	6/30/14
33.	[REDACTED]	7/7/14

CONFIDENTIAL

7/28

9 p2

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 9-1

[Pages 1 through 2]

Internal Audit Notes

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 9-2

[Page 1]

Internal Audit Notes

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 9-3

[Page 1]

Internal Audit Notes

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 9-4

[Page 1]

Internal Audit Notes

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 9-5

[Page 1]

Internal Audit Notes

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 9-6

[Page 1]

Internal Audit Notes

CONFIDENTIAL

Title Risk Mgt Plan

9/19/14
JLP
AK

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.

(A) 2014 Hedging Strategy (TFB-4, Items 2 and 8)

FPL plans to hedge a portion of its projected 2015 natural gas requirements during 2014. 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 2015 natural gas requirements within the Hedging Window during 2014. This hedge percentage is consistent with 2014 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 [redacted] hedges to project natural gas requirements.
- 3) FPL will execute its natural gas hedges for 2015 from [redacted] through [redacted] as shown below.

See sep 45-d

2
3
4
5

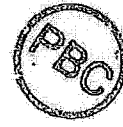
Hedging Window

6 [redacted]
7 [redacted]

During each month of the Hedging Window, FPL will hedge the percentages shown of its projected 2015 natural gas requirements. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.

- 4) FPL intends to rebalance its natural gas hedge positions during the year based on changes in forecasted market prices, projected unit outage schedules or changes in FPL's load forecast. Once the initial monthly target volumes have been hedged, rebalancing will be executed to maintain the hedge percentages inside approved tolerance bands. The monthly tolerance bands for natural gas are [redacted]. Therefore, the minimum and maximum monthly hedge percentages are [redacted] respectively.

8
9



40-1 p 51

Florida Power & Light Company
 Hedging Activities
 Dkt# 140001-EI, ACN 14-083-4-1
 TYE 7/31/14

Natural Gas Procurement

CONFIDENTIAL

*JLP
8/14*

Title Reconciliation to Filing

	A	B	C	D
	Volume	Gain/(Loss)	Broker Fees	Rev Filing
3/28/14 Filing				
1 Aug-13	43-2	[REDACTED]	[REDACTED]	2-1 p1 ✓
2 Sept		[REDACTED]	[REDACTED]	2-1 p3 ✓
3 Oct		[REDACTED]	[REDACTED]	2-1 p5 ✓
4 Nov		[REDACTED]	[REDACTED]	2-1 p7 ✓
5 Dec		[REDACTED]	[REDACTED]	2-1 p9 ✓
6 August - December 13				
				\$ (7,566,901.00)
8/13/14 Filing				
7 Jan-14		[REDACTED]	[REDACTED]	2-2 p2 ✓
8 Feb		[REDACTED]	[REDACTED]	2-2 p3 ✓
9 Mar		[REDACTED]	[REDACTED]	2-2 p4 ✓
10 Apr	43-2-1	[REDACTED]	[REDACTED]	2-2 p5 ✓
11 May		[REDACTED]	[REDACTED]	2-2 p6 ✓
12 Jun		[REDACTED]	[REDACTED]	2-2 p7 ✓
13 Jul		[REDACTED]	[REDACTED]	2-2 p8 ✓
14 January - July 14				\$ 131,436,090.50 2-2 p1 ✓

Derivative Settled Report (as referenced)

Source: 3/28/14 Filing (Request 4)
 SOURCE 8/13/14 Filing (Request 16)

43-1 p1

[Handwritten mark]

43-1 p1

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Title Selections from
Monthly Derivatives
Report.

Hedge Gas

Aug-13

Counterparty

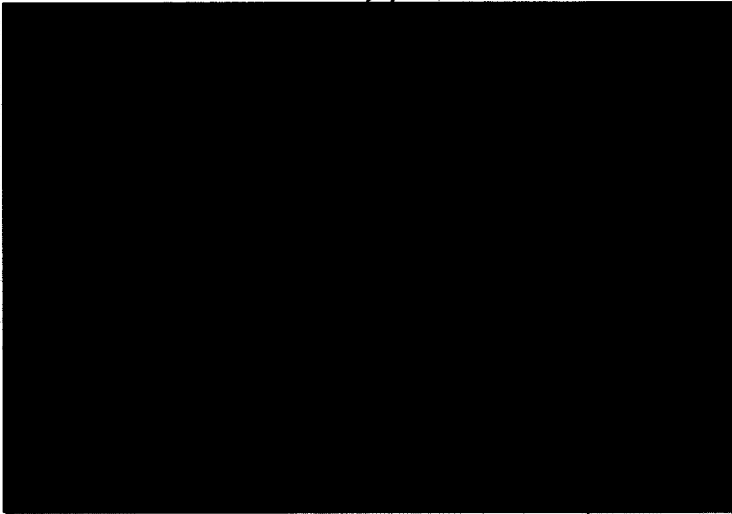
A

Volume

B

Gain/(Loss)

C



5/1/14 JEP
7/1/14

CONFIDENTIAL

43-1 p1

43-1 p1

Apr-14

Counterparty

D

Volume

E

Gain/(Loss)

F



43-1 p1

43-1 p1

SOURCE Monthly Derivatives Settlement
Report

43-2

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

FPL Derivative Settlements - Hedge Gas (August 2013)

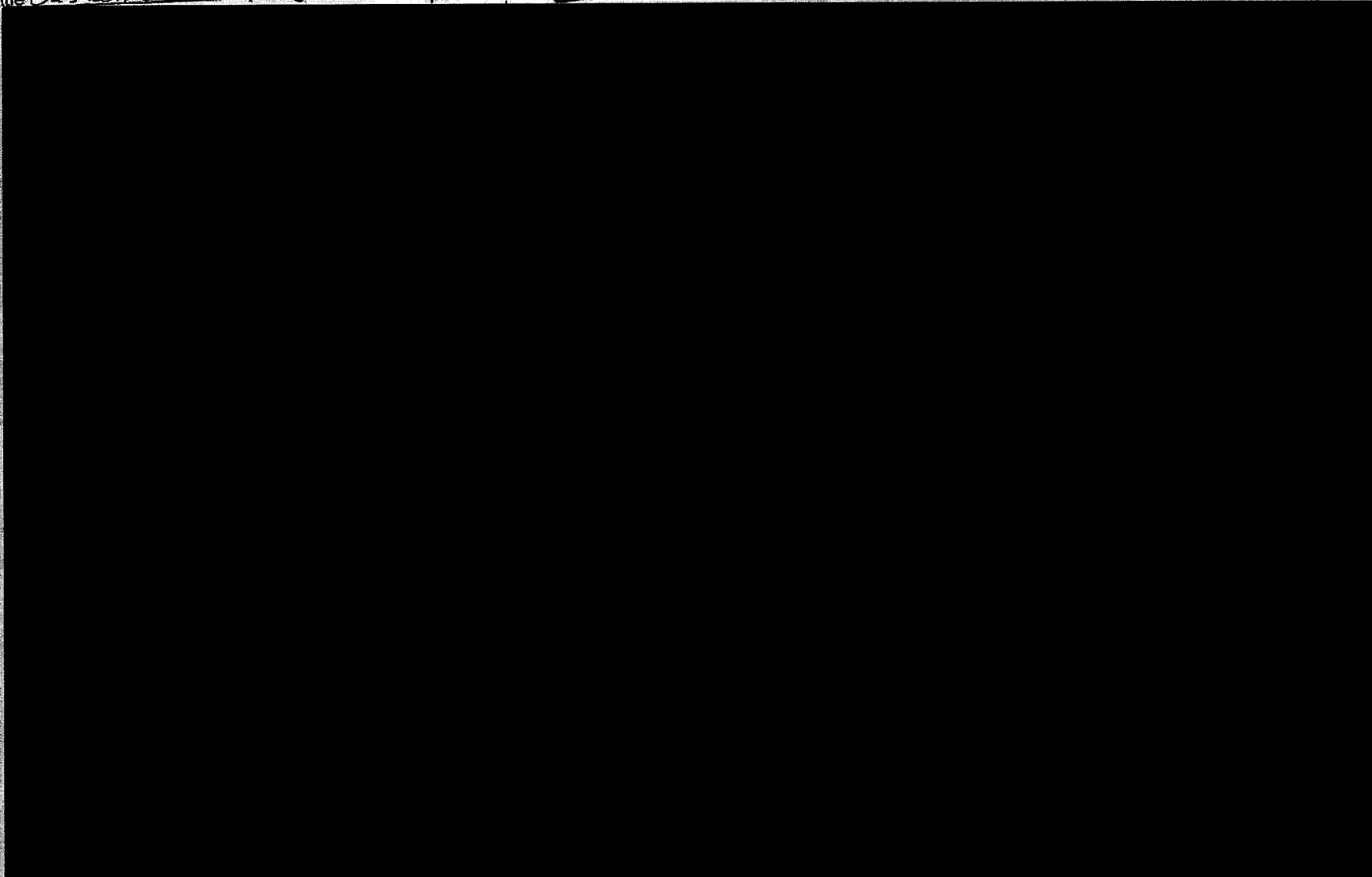
CONFIDENTIAL

JAP
7/14

Title Gas Settlements - Aug 13

D E

F G H



43-30



SOURCE Reg. 1

43-3 p1

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

FPL Derivative Settlements - Hedge Gas (August 2013)

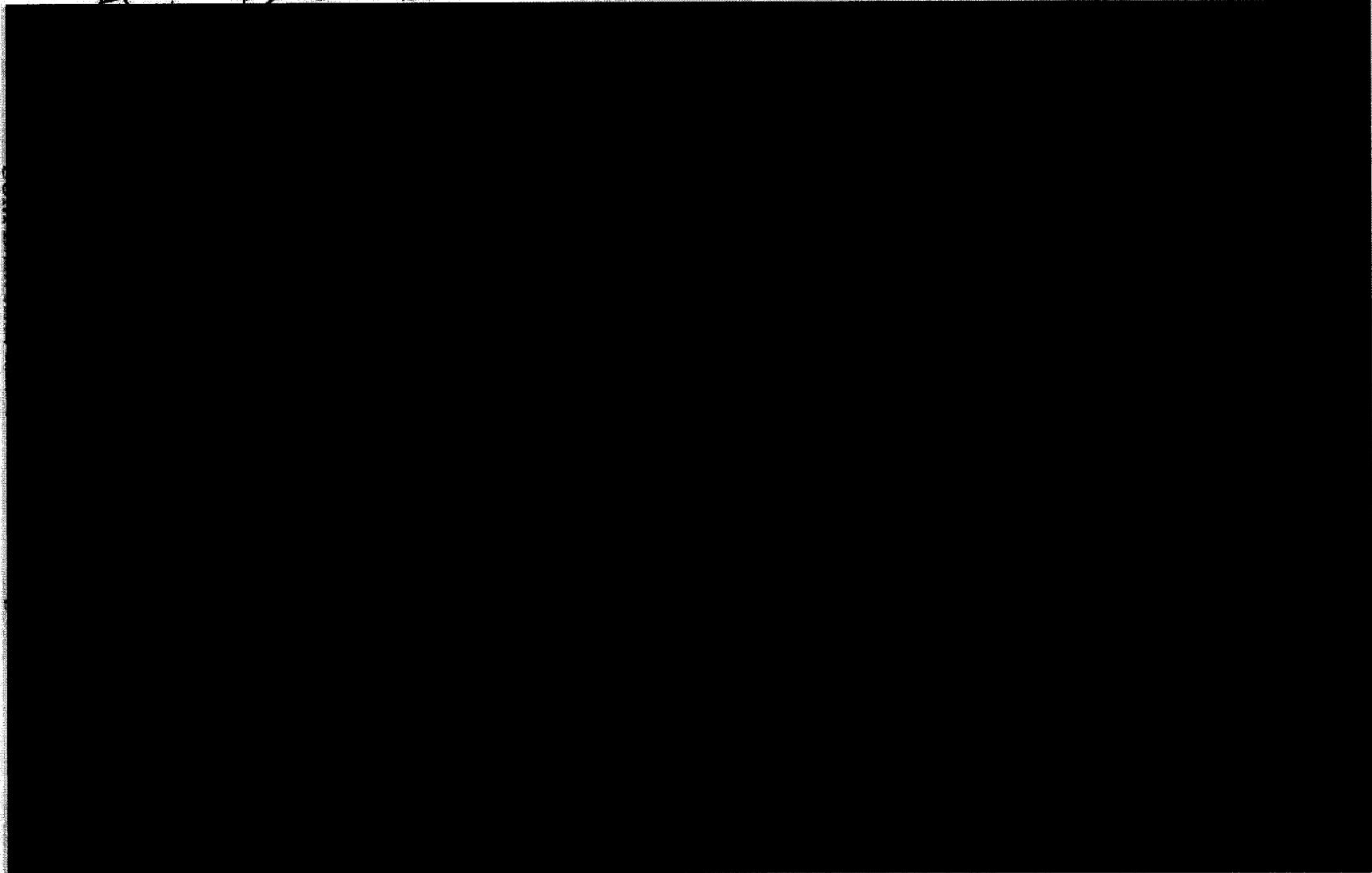
CONFIDENTIAL

Title Gas Settlement Aug 2013
A B C

D E

F G H

7/14/14



43-30



SOURCE Req. 1

2

43-302

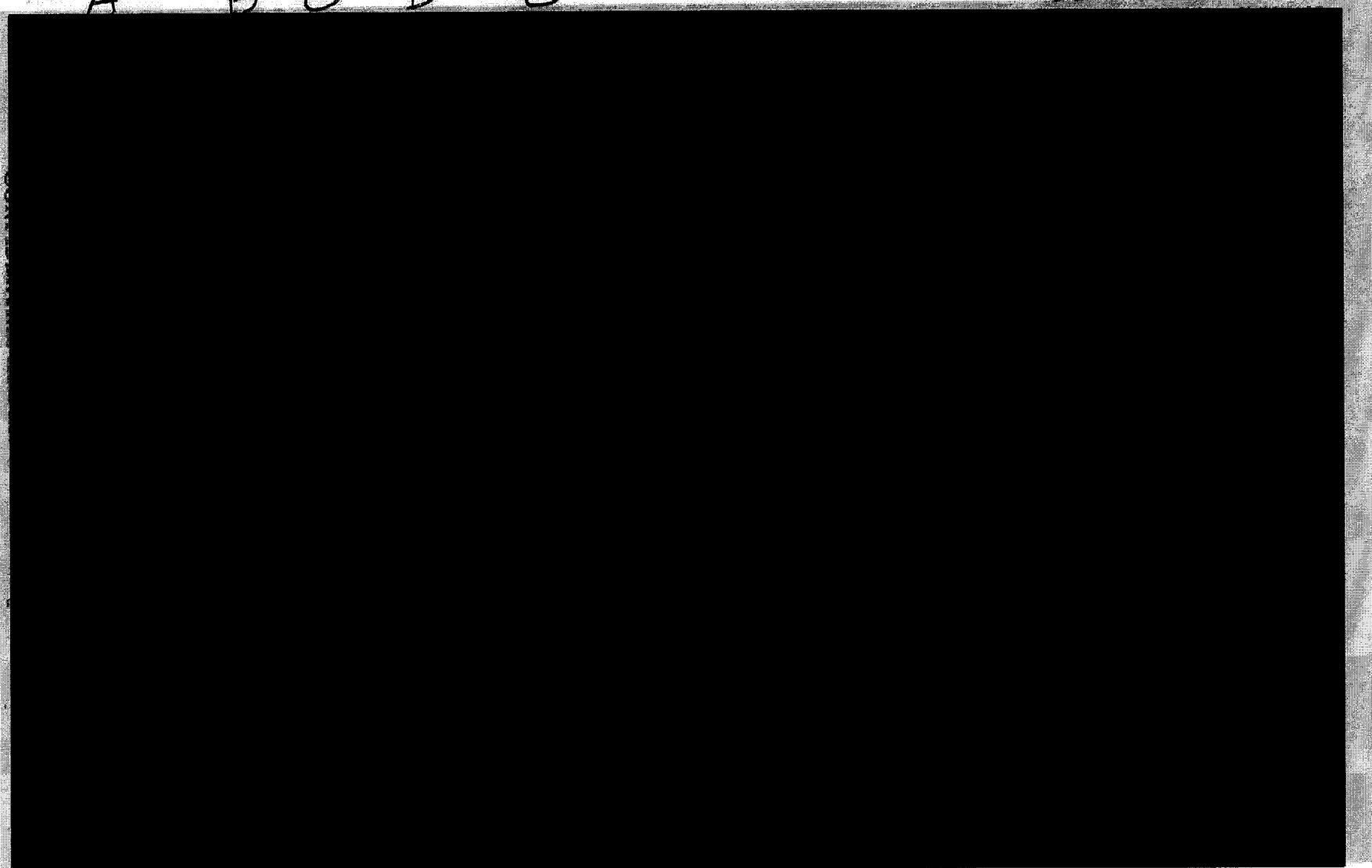
Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

FPL Derivative Settlements - Hedge Gas (August 2013)

Title Gas Settlement - Aug 2013
A B C D E

^{G H}
CONFIDENTIAL

JWP
7/14



43-383

SOURCE Req. 1

PBC

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43-383

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

FPL Derivative Settlements - Hedge Gas (August 2013)

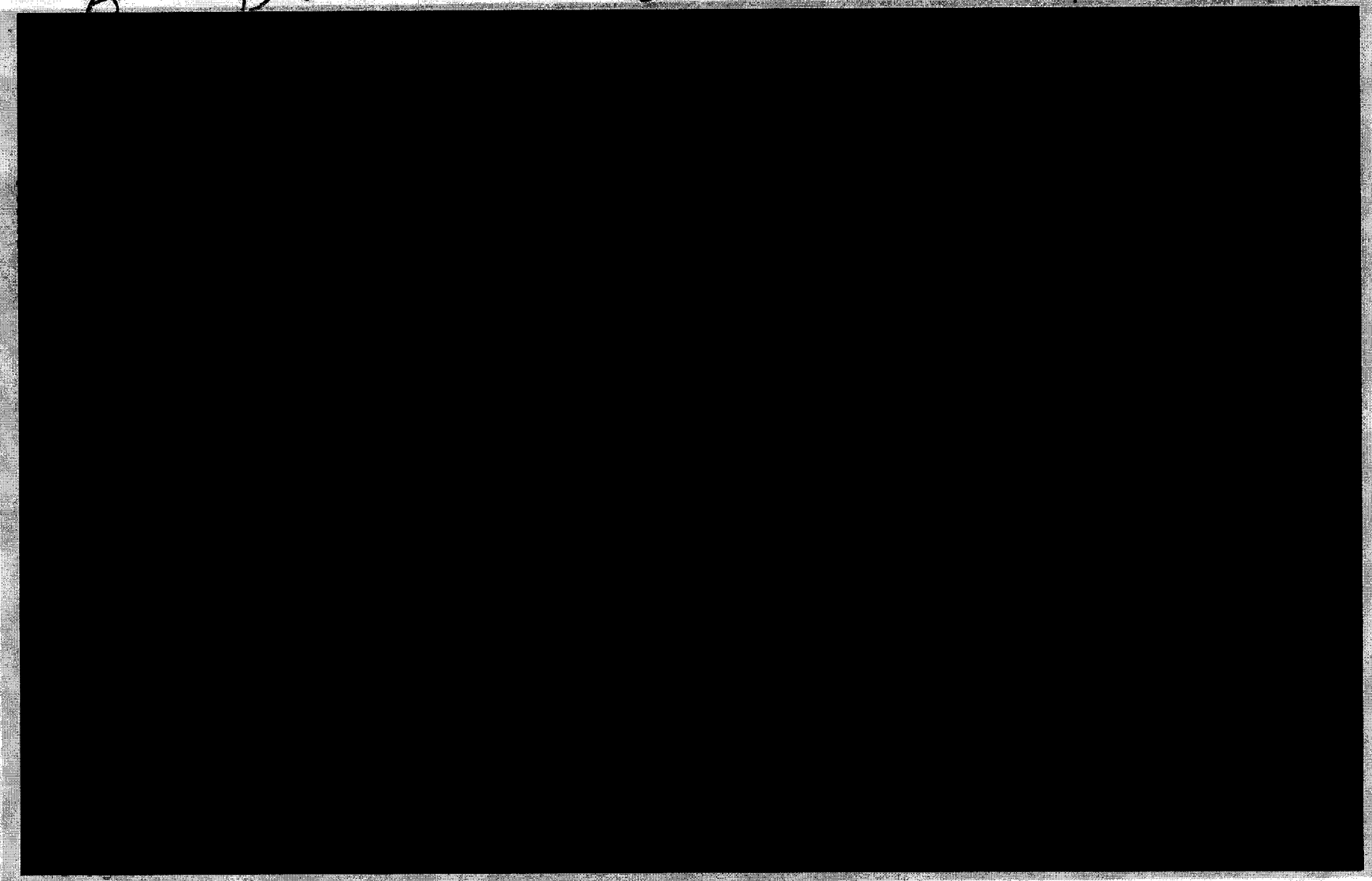
CONFIDENTIAL

Title Gas Settlements Aug 2013

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DHP
7/14



43-304

SOURCE: Req. 1



43-304

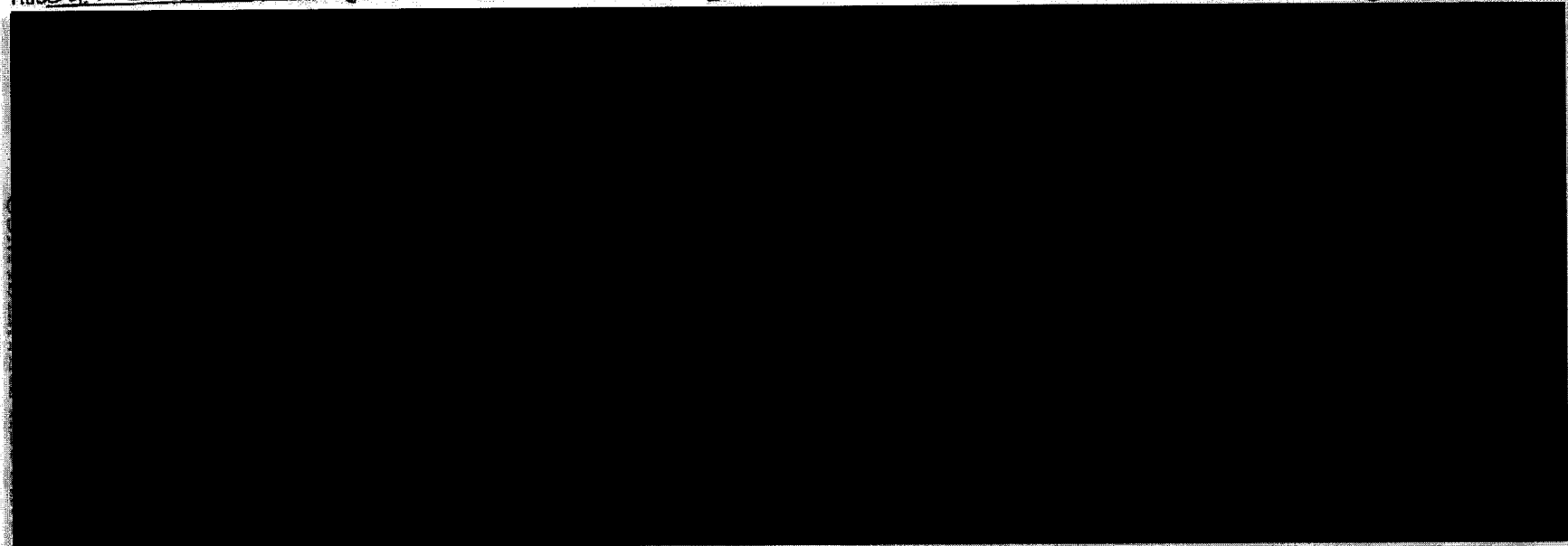
Florida Power & Light Company
Hedging Activities
DK# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

FPL Derivative Settlements - Hedge Gas (August 2013)

Title Gas Settlements A B C Aug 2013 D E

~~CONFIDENTIAL~~

JHP
7/14



AUDIT REQUEST NO. 1

43-316

SOURCE Req. 1



5
43-315

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Title Gas Settlement - August 2013
A B

FPL Derivative Settlements - Hedge Gas (August 2013)

CONFIDENTIAL

8/14

C

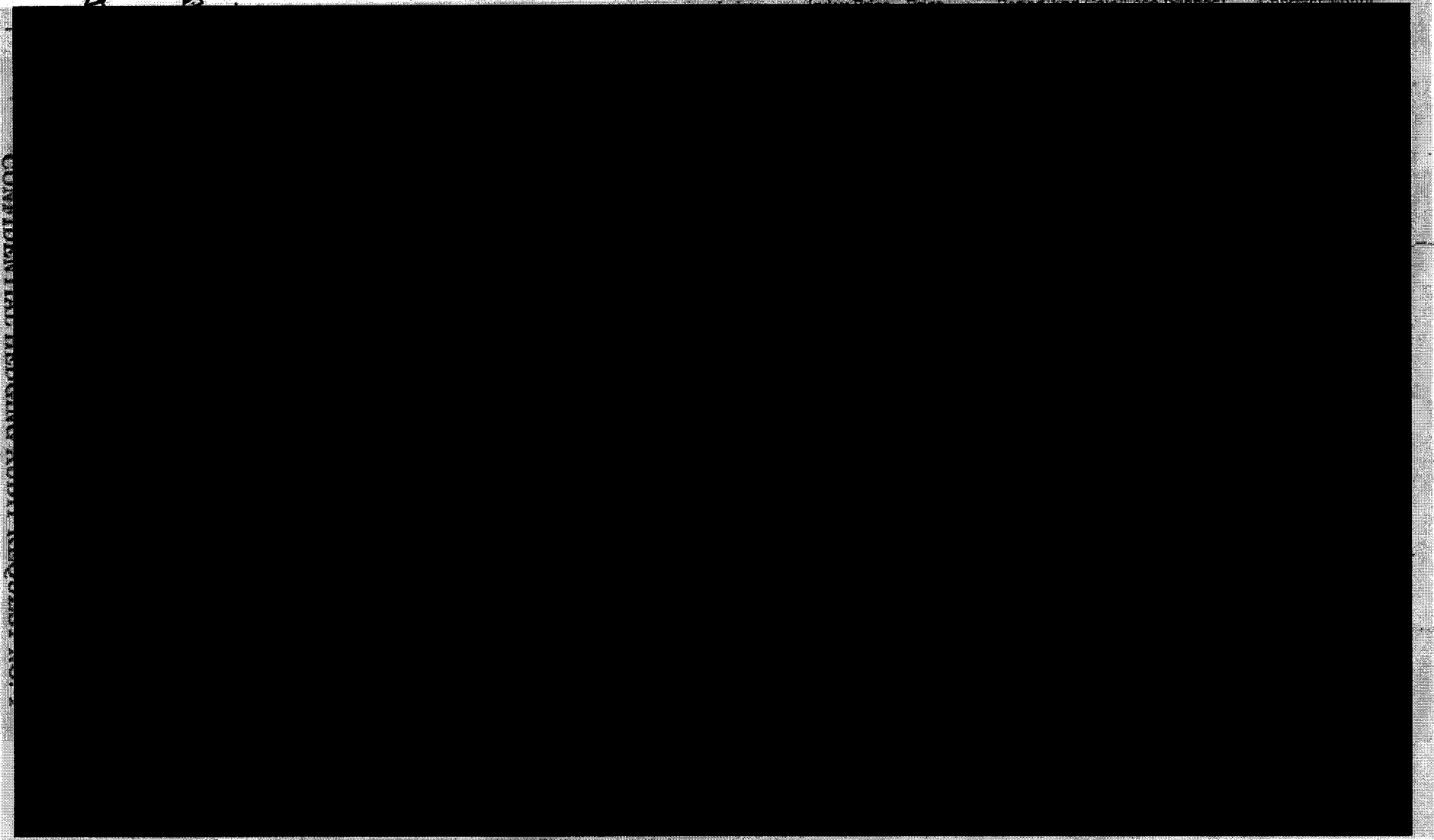
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CONFIDENTIAL

43-3p6

EXHIBIT Reg. 1



8/14
43-3p6

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Title Gas Settlement - Aug 2013
A B

FPL Derivative Settlements - Hedge Gas (August 2013)

C D E F

CONFIDENTIAL

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JWP
7/14

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



43-3 p7

SOURCE Req. 1



JWP
43-3 p7

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Title Gas Settlements Aug 2013

FPL Derivative Settlements - Hedge Gas (August 2013)

CONFIDENTIAL

JHP
7/4
H

A B

C

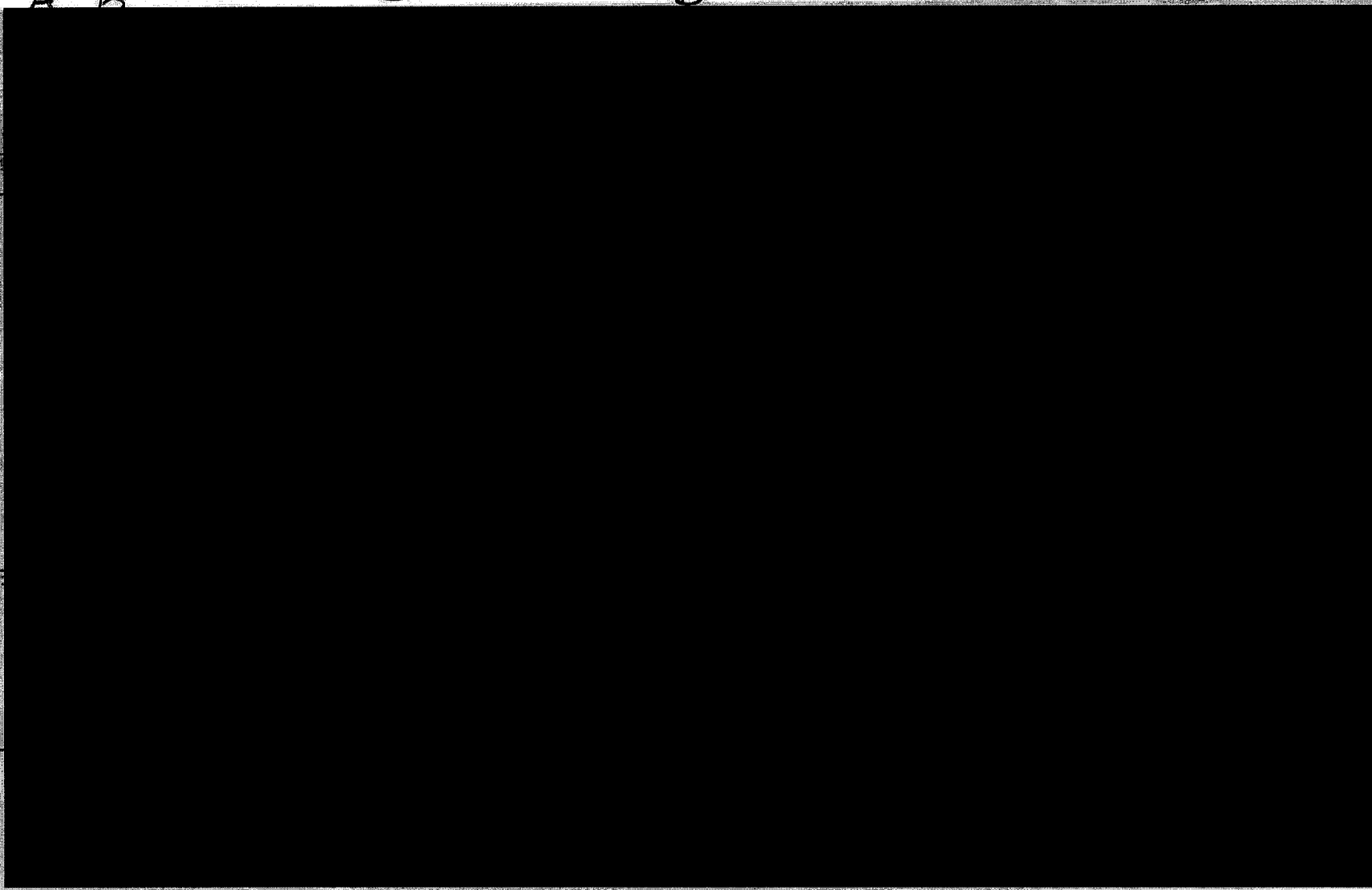
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CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



433p8

SOURCE Req 1



433p8

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Title Gas Settlements Aug 2013
A B

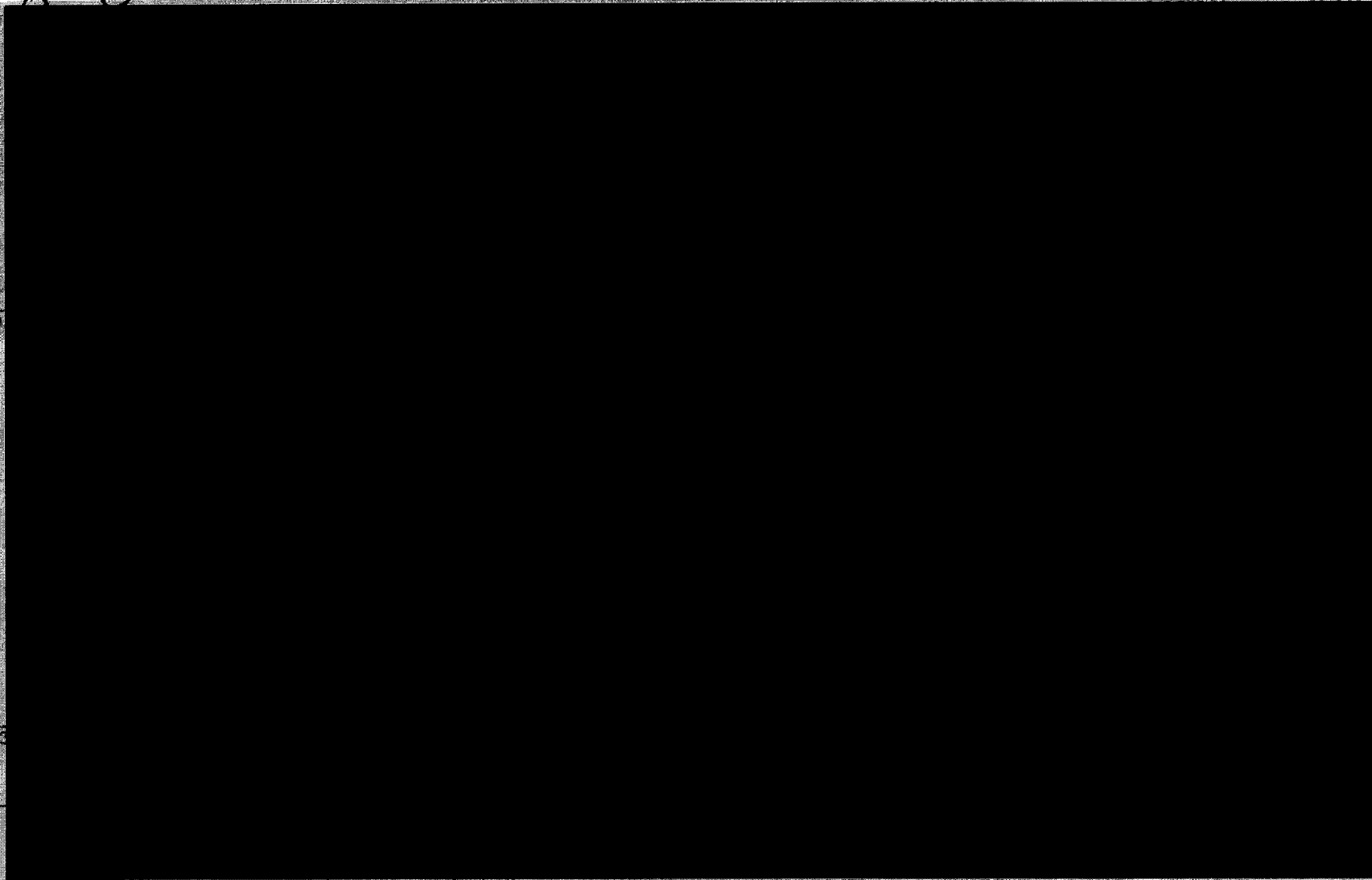
FPL Derivative Settlements - Hedge Gas (August 2013)

CONFIDENTIAL

JHP
7/14
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C D E F G

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



93-39

SOURCE Req-1



9/1/14
933 p.9

Title Gas Settlements - Aug 2013

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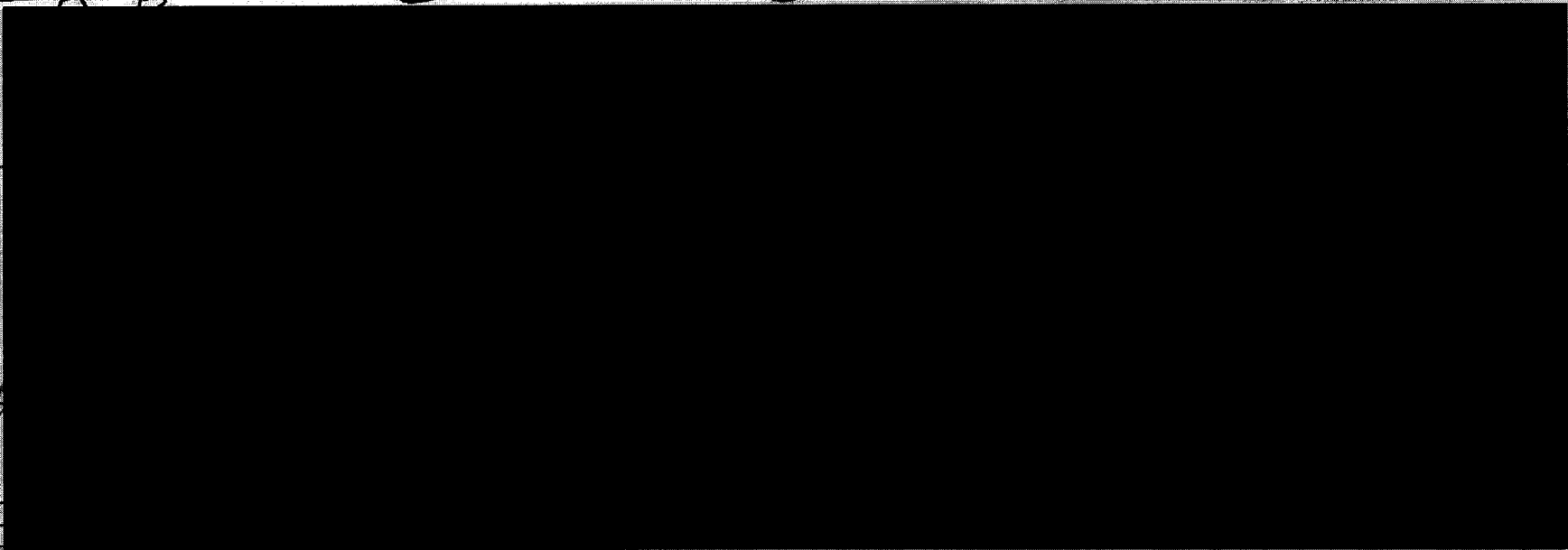
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JFH
7/14

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



43-2

✓ - per Seley pg 17
3/28/14

(A) Agreed to invoice and purchase strand. Agreed
the deal prices from purchase strands to the deal tickets, confirmation notices.
Agreed the settlement/floor price to the Platts-Gas Daily
NYMEX Henry Hub futures contract publication. - dtd 7/30/13
(for Aug 2013).

(B) Agreed loss to monthly gas closing report, to NB
options/swaps incurred during mth report and to
BE recorded to acct 3305000.

One deal ticket pricing
was reviewed by performing
a reasonableness calculation from
the NYMEX H Hub futures rate for the

PBC

specific trade
docs. See

43-3
2-1 ✓ for sample.

10
9/10
43-3 p10

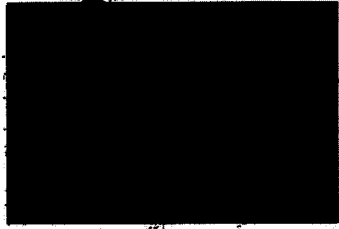
43-3 p10

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

CONFIDENTIAL
D

119
JHP
8/14

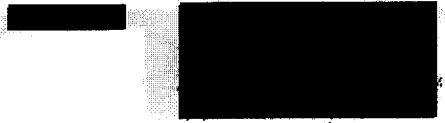
Title Invoice



A B C

Please note our payment instructions for all Commodity Derivative Transactions are as follows:

1
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ENTERED BY: SHARON PATRIE DATE: 8/1/13
PHONE: (551) 691-7897 COMPANY CODE: 1500
AUTHORIZED BY: _____

REQUIRED IF UNDER \$250

Use Funds:

WACHOVIA BANK NA
ABA: 026-005-082
SWIFT: PNBUS33NYC
Swift: BORNUS4X
A/C: _____
CHIPS: 204260

6

SAP DOCUMENT #/S: 19000218 605

ACCT NUMBER: 25000000 FE/13.6370001998

7



M Doery
Michelle Doery

Manager, Power & Risk Accounting

$\frac{143}{8}$ Purchase sheet
P3 E



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CONFIDENTIAL HEDGING AUDIT REQUEST NO. 5

433/1

SOURCE Page 5



433
1 P1

Invoice Date: July 31, 2013
 FLORIDA POWER AND LIGHT COMPANY
 700 University Blvd.
 Juno Beach, Florida
 33408

Florida Power & Light Company
 Hedging Activities
 Dkt# 140001-El, ACN 14-083-4-1
 TYE 7/31/14

Title Invoice

JHP
8/14

Attn: Settlement, Sharon, Patrice
 Tel: 561-891-7897
 Fax: 15616257199
 Email: Sharon.Patricia@fpl.com

CONFIDENTIAL

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 5

TRADE SETTLEMENTS REPORT FOR August 05, 2013

Currency: USD												
Trade Ref / Comp	Trade Date	Period Start Date	Period End Date	Quantity	Unit	Price/Strike Basis	Qty/Sel (P/L/C)	Commodity	Settlement Price	Settlement Price2	Flow	Due to (Counterparty)
ENGY-SWAP												
	A	B	C	D		E	F	G	H	I		J
1	274969				MWBTU						Cash	
2	278081				MWBTU						Cash	
3	278893				MWBTU						Cash	
4	283232				MWBTU						Cash	
5	285115				MWBTU						Cash	

433/2/2/14

SOURCE Reg 5



43-3
1 p 2

A B C D E F G **CONFIDENTIAL** H

Handwritten: JEP 8/14

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 5

287008	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]
288732	[REDACTED]	MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]
291218	[REDACTED]	MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]
292778	[REDACTED]	MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]
299316	[REDACTED]	MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]
299742	[REDACTED]	MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]
301470	[REDACTED]	MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]
305736	[REDACTED]	MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]
315705	[REDACTED]	MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]
318586	[REDACTED]	MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]
318935	[REDACTED]	MMBTU	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Cash	[REDACTED]

Handwritten: 1/13/14

SOURCE Page 5



Handwritten: 7/16/14
439
1 P3

E P G H **CONFIDENTIAL** J

11/14
 8/14

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 5

1
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322955	[REDACTED]	[REDACTED]	Cash	[REDACTED]
323884	[REDACTED]	MMBTU	Cash	[REDACTED]
330220	[REDACTED]	MMBTU	Cash	[REDACTED]
332591	[REDACTED]	MMBTU	Cash	[REDACTED]
364323	[REDACTED]	MMBTU	Cash	[REDACTED]
364348	[REDACTED]	MMBTU	Cash	[REDACTED]
365275	[REDACTED]	MMBTU	Cash	[REDACTED]
365420	[REDACTED]	MMBTU	Cash	[REDACTED]
369640	[REDACTED]	MMBTU	Cash	[REDACTED]
370438	[REDACTED]	MMBTU	Cash	[REDACTED]

Subtotal for ENERGY SWAP

USD

USD

Total \$4185,000
 SOURCE Reg 5
 433 Pk



433 PG 4

11/14
 8/14
 1 Pk

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Total Net Amount Due From FLORIDA POWER AND LIGHT COMPANY

CONFIDENTIAL

JUL 31/14

PI

Title Invoice

Payment Details

FLORIDA POWER AND LIGHT COMPANY Settlement Instructions

Currency:	CAD	Currency:	USD
Beneficiary:	FLORIDA POWER AND LIGHT COMPANY	Beneficiary:	FLORIDA POWER AND LIGHT COMPANY
Correspondent Bank:		Correspondent Bank:	BANK OF AMERICA, N.A.
Swift #:		Swift #:	
ABA #:		ABA #:	19431100012
ACH #:		ACH #:	
Addr:	Settlement Sharon Paffie	Addr:	Settlement Sharon Paffie

Payment will be effected on the date mentioned above for the amount detailed. No further documentation is required for this settlement unless any discrepancies are noted.

If no discrepancy is corresponded within 2 business days from the Invoice Date, we will assume that you agree to details mentioned above. Any amounts not paid shall accrue interest at the average prevailing interest rate for the prime commercial loans quoted by major banks.

This Trade Settlement Report is valid without authorized Bank Signature. For Settlement purposes only.

This electronic transmission is intended only for the individual organization to whom it is addressed and may contain confidential and privileged information.

If this transmission has been received in error, please notify the sender immediately and destroy any copies of this transmission. Any dissemination or use of this information by a person other than the intended recipient is unauthorized and may be illegal.

END OF REPORT

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 5

43-3/19-5 PS

Page 5 of 5.

SOURCE Reg 5



43-3/19-5 PS

Purchase Statement

Florida Power & Light Company
 Hedging Activities
 Dkt# 140001-El, ACN 14-083-4-1
 TYE 7/31/14

Purchase Statement: 140001

Counterparty:
 Date:
 Period:
 Amount:
 Due Date:

140001-004500

JEP
 5/14

Title Purchase Stmt

Florida Power & Light Company
 Tax ID # 59-0247775
 ARMS Processing (PPG/GO)
 General Mail Facility
 Miami, FL 33188-0001

CONFIDENTIAL

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 5-133

Pay To

Summary

Deal Type	Deal Direction	Am't	Currency
SWPS	Buy		USD
		SWPS Subtotal	
		TOTAL	

2.49-2
 3.49-2
 1

Details

Settlement

Deal#	Type	Trade Dt	Term	Index	Volume	Unit	Deal Price	Fixed Price	Pay Price	Amount Due	Currency
1002217	Deal										USD
1007661	Deal										USD
1009612	Deal										USD
1017073	Deal										USD
1022367	Deal										USD
1026366	Deal										USD

deal ticket
 B
 C
 D
 E
 F 43-3 / 2-2
 G
 H
 I



✓ - agreed to deal ticket - 43-3 / 2-1 (sample # 1002217-deal)
 X - agreed to Platts-Gas Daily - 7/30/13 - Settlement Aug 2013

43-3
 2-2

43-3
 2-2

Purchase Statement

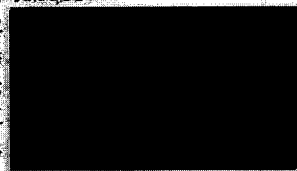
Florida Power & Light Company
 Hedging Activities
 Dkt# 140001-EI, ACN 14-083-4-1
 TYE 7/31/14

Florida Power & Light Company
 Tax ID: # 89-0247775

Title Purchase Stand

Purchase Statement: 196805

Counterparty:
 Date:
 Period:
 Amount:
 Due Date:



00110101

Handwritten initials

CONFIDENTIAL

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 5

Deal#	Type	Trade Dt.	Term	Index	Volume	Unit	Deal Price	Exec Price	Pay Price	Amount Due	Currency
SWAPS											
Buy											
		A	B	C	D		E	F	G	H	
1	102944	Deal					MMBTU				USD
2	1032877	Deal					MMBTU				USD
3	1035678	Deal					MMBTU				USD
4	1045772	Deal					MMBTU				USD
5	1046258	Deal					MMBTU				USD
6	1049419	Deal					MMBTU				USD
7	1053484	Deal					MMBTU				USD
8	1059383	Deal					MMBTU				USD
9	1064024	Deal					MMBTU				USD
10	1066388	Deal					MMBTU				USD
11	1071888	Deal					MMBTU				USD
12	1075903	Deal					MMBTU				USD
13	1081447	Deal					MMBTU				USD
14	1088847	Deal					MMBTU				USD
15	1092379	Deal					MMBTU				USD
16	1092550	Deal					MMBTU				USD
17	1094557	Deal					MMBTU				USD
18	1094860	Deal					MMBTU				USD
19	1102733	Deal					MMBTU				USD
20	1103353	Deal					MMBTU				USD

SOURCE Req 5



Handwritten notes and initials

Florida Power & Light Company
 Hedging Activities
 DK# 140001-EI, ACN 14-083-4-1
 TYE 7/31/14

CONFIDENTIAL

JUL 31/14

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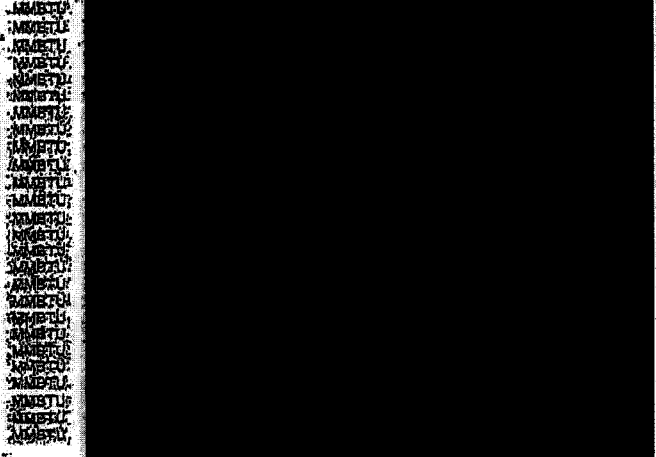
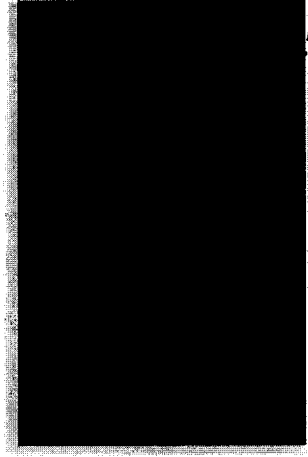
Title Purchase Stmt.

B C D

E F G H I J

Accountant: [REDACTED]
 Portfolio: FPL Hedging 2013
 Strategy: HDGE 100512

Dist	Unit	Day	Price	Qty	Start	End	Date	Balance
1	100227							
2	100743							
3	100847							
4	101708							
5	102203							
6	102203							
7	102203							
8	102203							
9	102203							
10	102203							
11	102203							
12	102203							
13	102203							
14	102203							
15	102203							
16	102203							
17	102203							
18	102203							
19	102203							
20	102203							
21	102203							
22	102203							
23	102203							
24	102203							
25	102203							
26	102203							
27	102203							
28	102203							
29	102203							
30	102203							



CONFIDENTIAL HEDGING AUDIT REQUEST NO. 5.

JUL 31/14

403/2/19 3:09

SOURCE Reg 5



41/11/14
 423/2/14

Title Real ticket

CONFIDENTIAL

9/1/14 JLP
 8/14

1
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43-3 / 2-1

You are not authorized to edit this data

Status: Saved Locked Confirmed Confirmed/Not Executed Modified Last Modified: 2012-01-07 10:31:02 Created: 2012-01-11 14:03:22

Number: 102212 Ticket:

Trade Book: Ticket: Confirmed/Not Executed:

Product: FPL Hedge Gas 2011

Open Call:

Contract:

Base Contract: FPL 1502 06-007 Deal Type: Swap

Direction: Buy Basis: Hedge/Arbitrage/Quarantine

Category: OTC Strategy: Hedge/Arbitrage

Product:

Category:

Product:

Pay/Receive:

Receive/Provide:

Rate/Quantity:

Rate Location:

Currency: USD Inv. or Deposit:

Counter Deal Type: Type:

Reference Type:

Settlement Method:

Start Date:

End Method: End Date:

Interest Notes:

Special Terms:

Posting Notes:

Close

Year	Contract Month	Volume per Contract	Price	Daily Contract	Daily Volume	Monthly Contract	Daily Volume	Executed
1								<input type="checkbox"/>
2								<input type="checkbox"/>
3								<input type="checkbox"/>
4								<input type="checkbox"/>
5								<input type="checkbox"/>
6								<input type="checkbox"/>
7								<input type="checkbox"/>
8								<input type="checkbox"/>
9								<input type="checkbox"/>
10								<input type="checkbox"/>
11								<input type="checkbox"/>
12								<input type="checkbox"/>
13								<input type="checkbox"/>
14								<input type="checkbox"/>
15								<input type="checkbox"/>
16								<input type="checkbox"/>

43-3 / 2-1 **43-3 / 2-1** **43-3 / 2-1**

✓ - agreed to
 EMT p46 - Procedures
 manual "Authorized
 dealmaker"

Ⓐ obtained the Gas Daily - NYMEX Kenneth gas futures
 for this day, to determine a reasonable price for deal
 price.
 See $\frac{43-3}{2-1} + \frac{43-3}{2-1}$ for example of work performed.



Source Page 5

$\frac{43-3}{2-1}$

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

CONFIDENTIAL

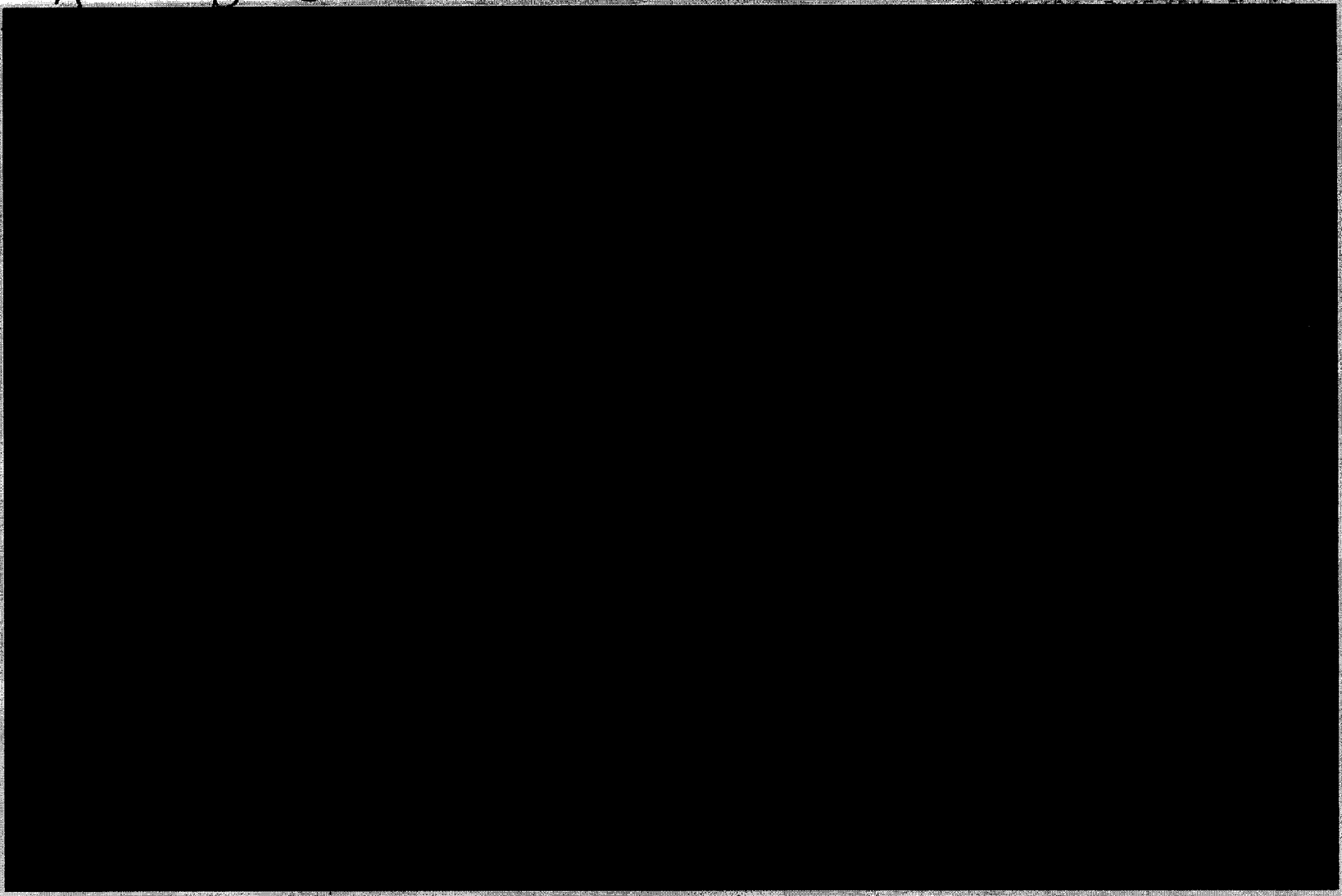
JHP
2/14

Title Gas Settlements - April 2014
A B C

FPL Derivative Settlements - Hedge Gas (April 2014)

D E F G H

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



43-491

SOURCE Req-1



1
43-4-p1

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

FPL Derivative Settlements - Hedge Gas (April 2014)

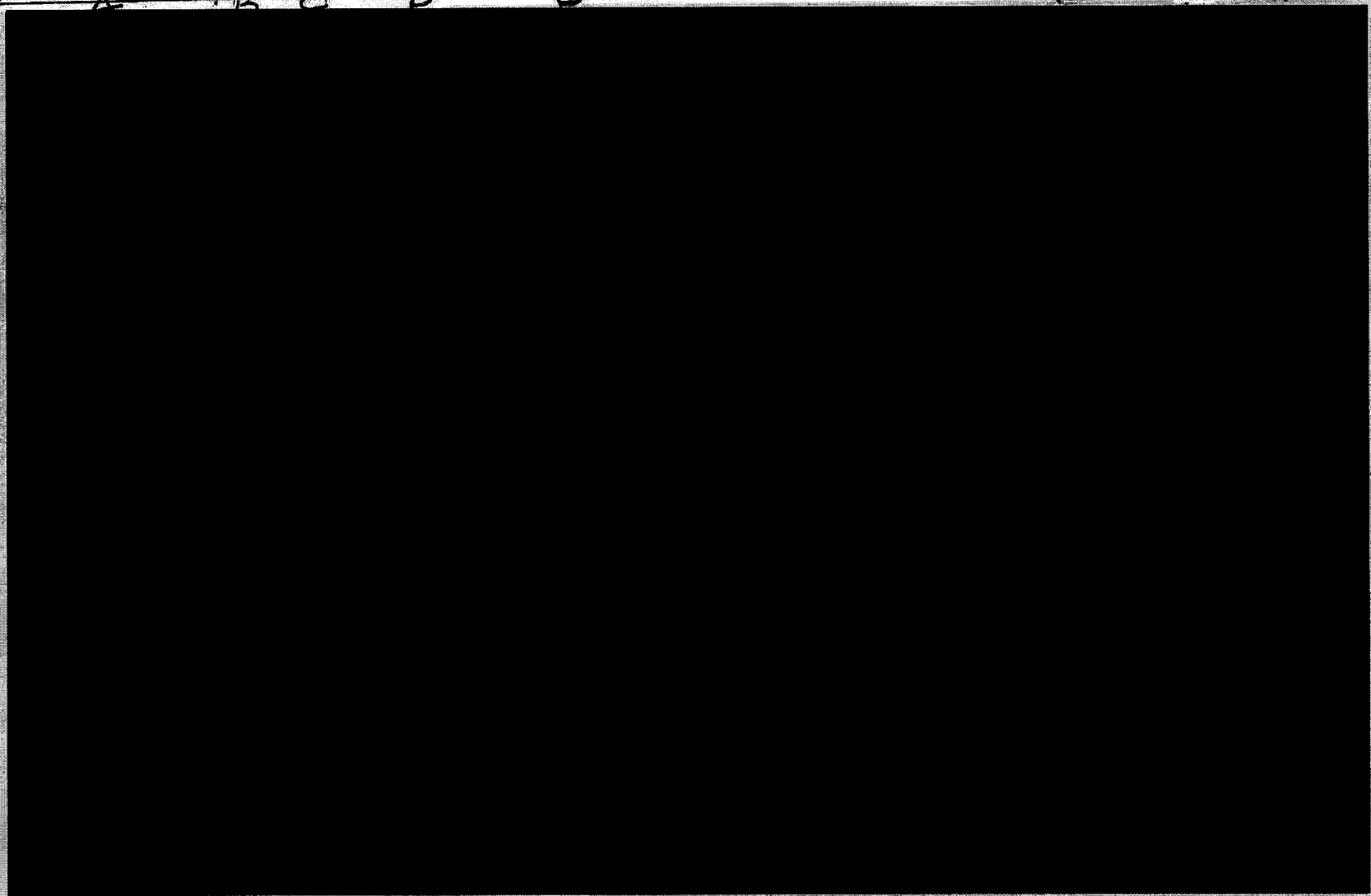
CONFIDENTIAL
E G H

4/14

Title Gas Settlements April 2014

D E

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



43-4p2

SOURCE Req-1



43-4p2

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

FPL Derivative Settlements - Hedge Gas (April 2014)

CONFIDENTIAL

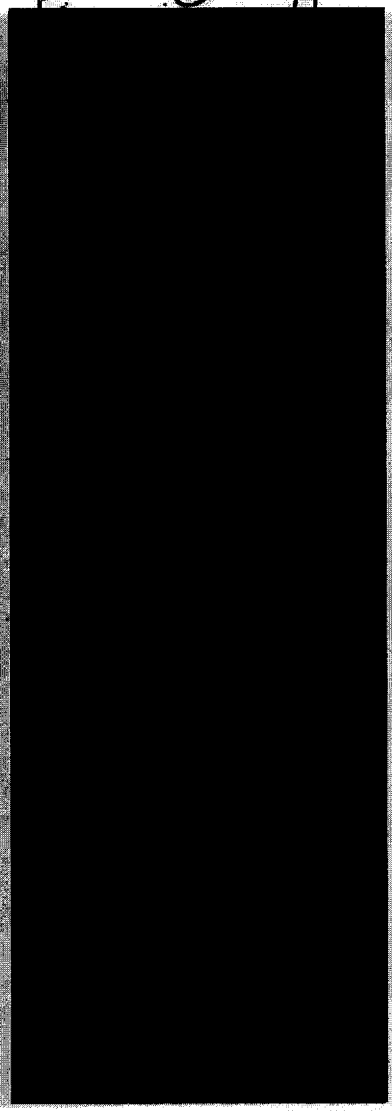
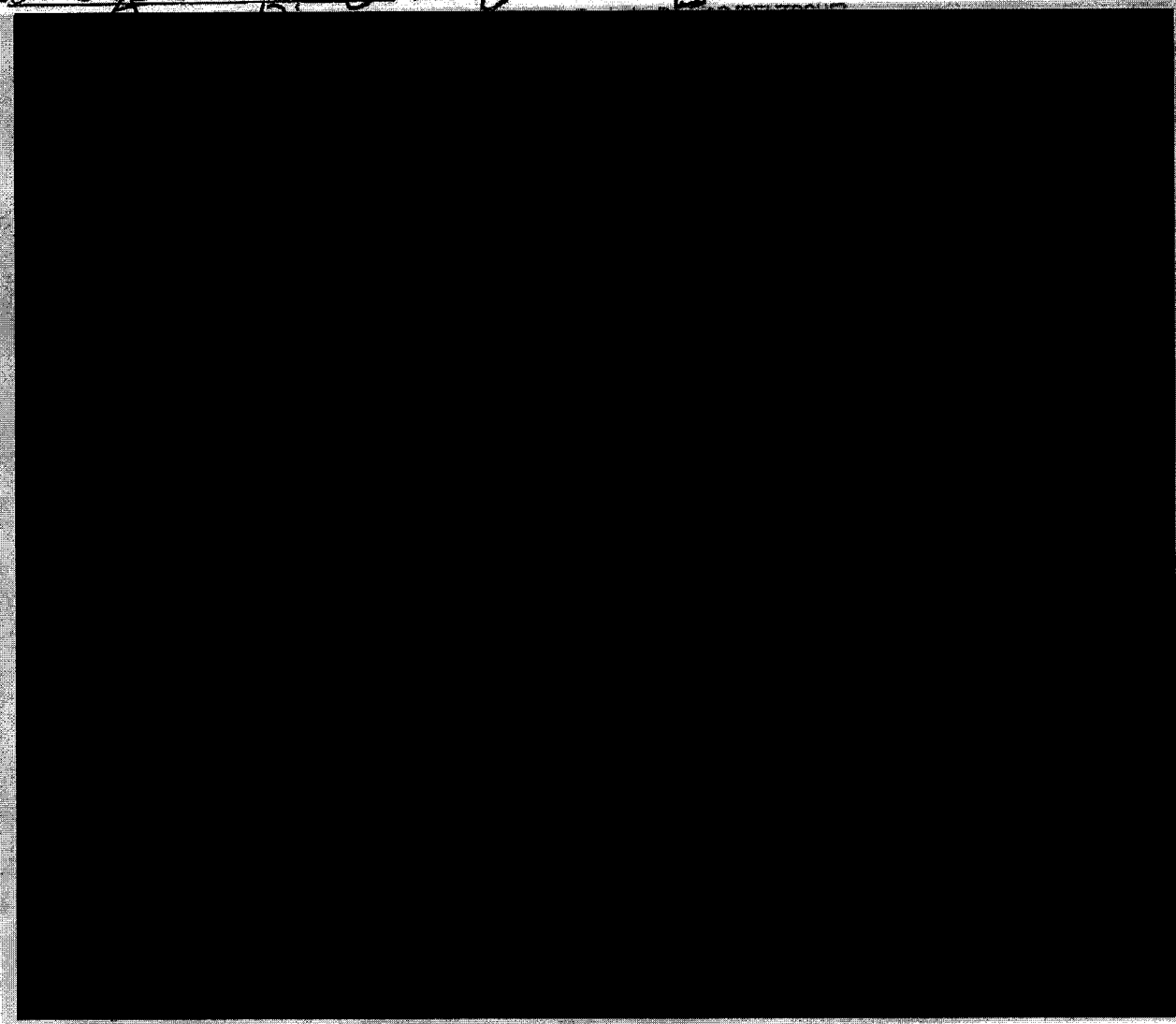
JHP
7/14

Title Gas Settlements - April 2014

D

E

E G H



CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1

49549 3

SOURCE Req - 1



3
434 p3

Florida Power & Light Company
Hedging Activities
DK# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

FPL Derivative Settlements - Hedge Gas (April 2014)

CONFIDENTIAL

Handwritten initials

Title Gas Settlement - April 2014

D. E

F B H

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



Handwritten initials

SOURCE Req-1



Handwritten notes and initials

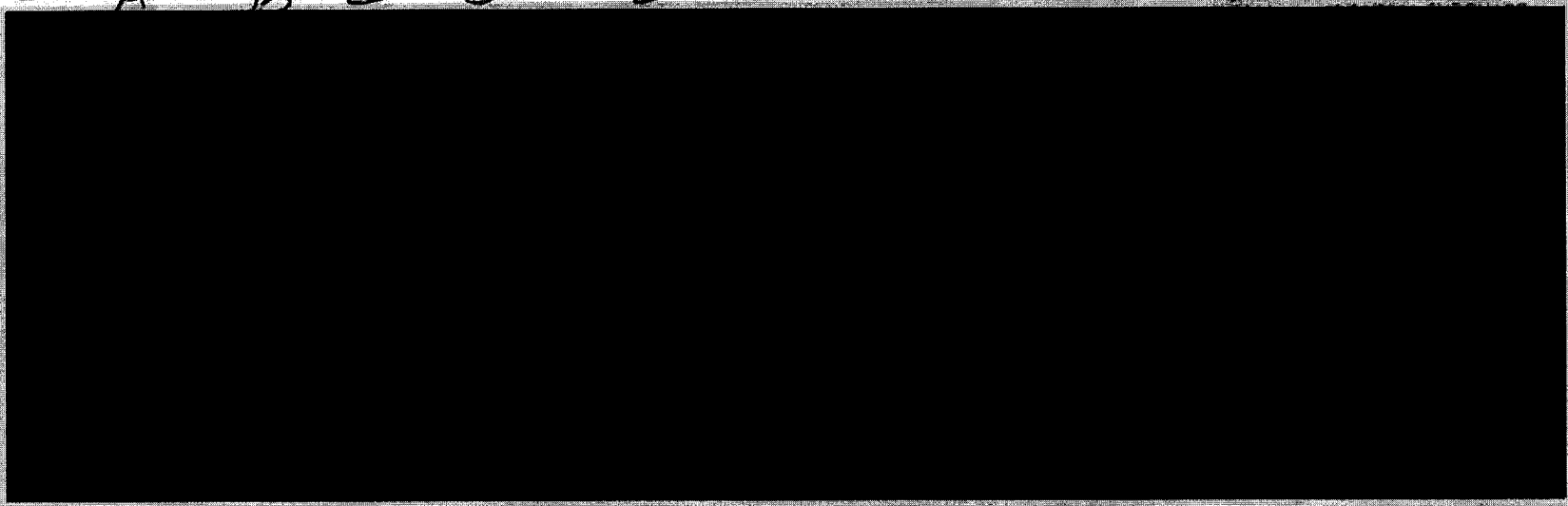
Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

FPL Derivative Settlements - Hedge Gas (April 2014)

CONFIDENTIAL
F G H

JAP
2/14

Title Gas Settlements April 2014
A B C D E



CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1

4/3/14

SOURCE Req-1

BC

5
4/3/14
43-7 p5

Florida Power & Light Company
Hedging Activities
Dkt# 140001-El, ACN 14-083-4-1
TYE 7/31/14

FPL Derivative Settlements - Hedge Gas (April 2014)

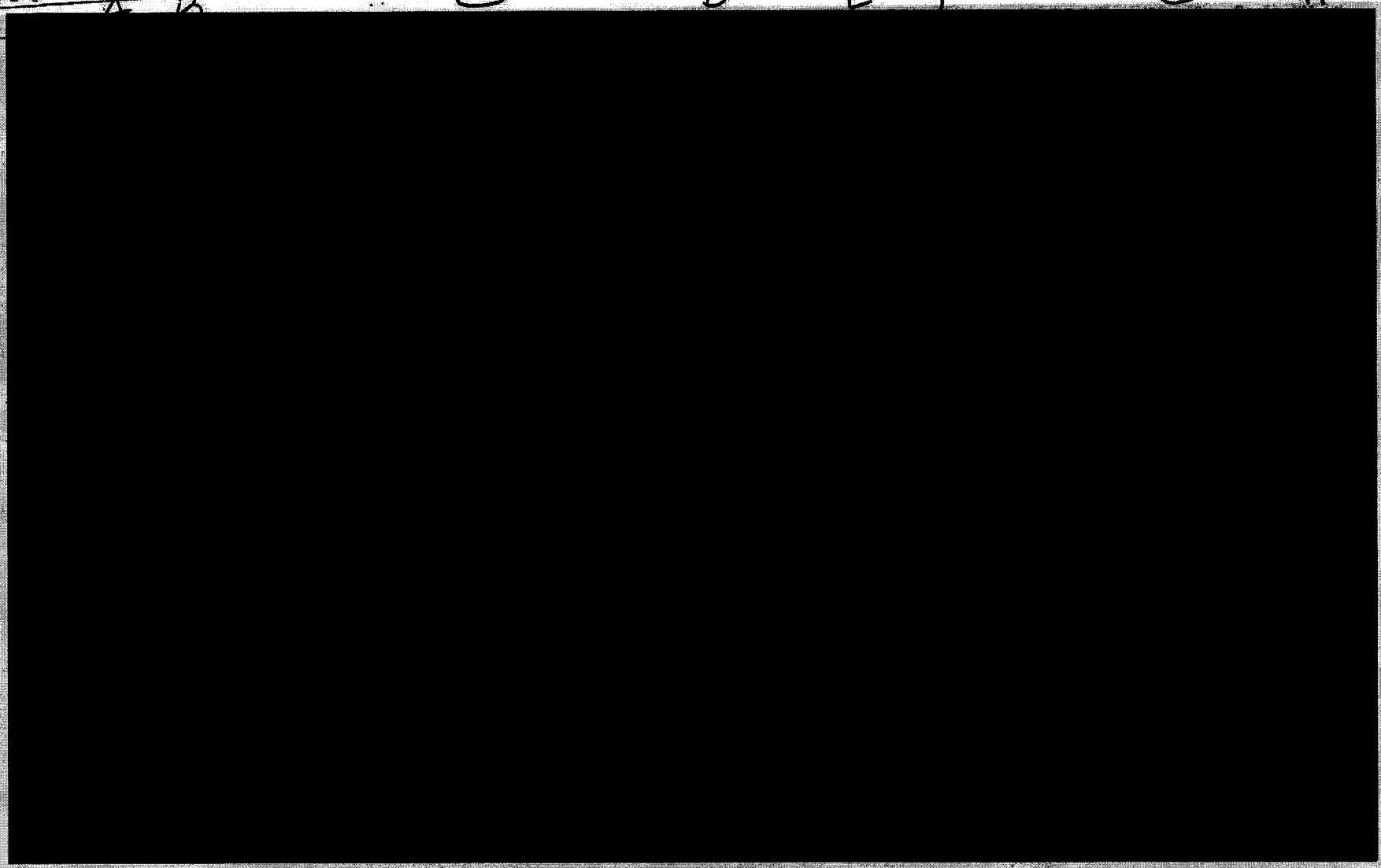
CONFIDENTIAL

4/14

Title Gas Settlements - April 2014

C D E F G H

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



43-419

SOURCE Req. 1



43-4 p 6

Florida Power & Light Company
Hedging Activities
DK# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

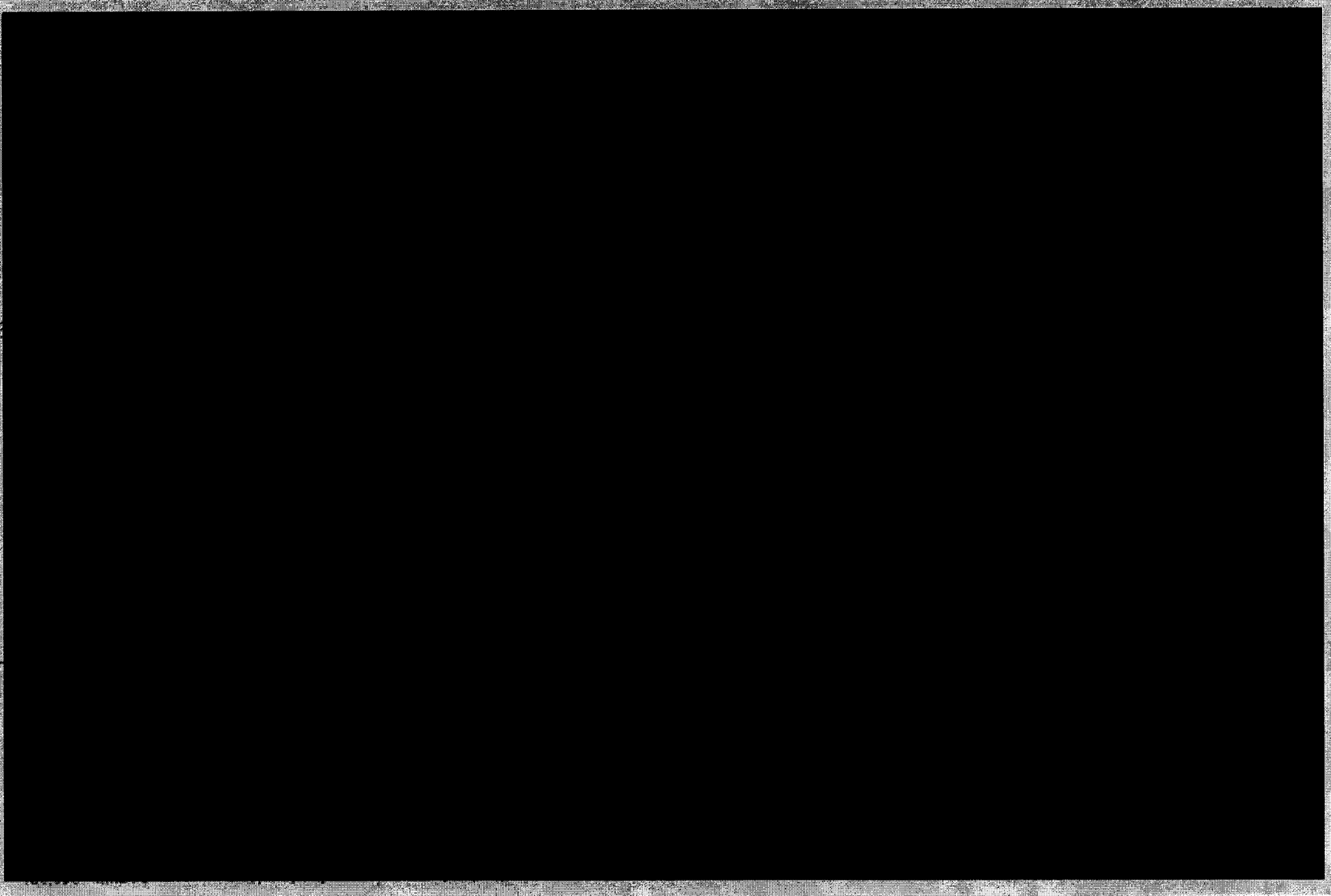
Title ^A ^B Gas Settlements - April 2014

^C FPL Derivative Settlements - Hedge Gas (April 2014)
^D ^E ^F

CONFIDENTIAL

JHP
7/14

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



JHP

SOURCE Req. 1



7
JHP
43-4-p7

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

CONFIDENTIAL

FPL Derivative Settlements - Hedge Gas (April 2014)

Title Gas Settlements April 2014
A B

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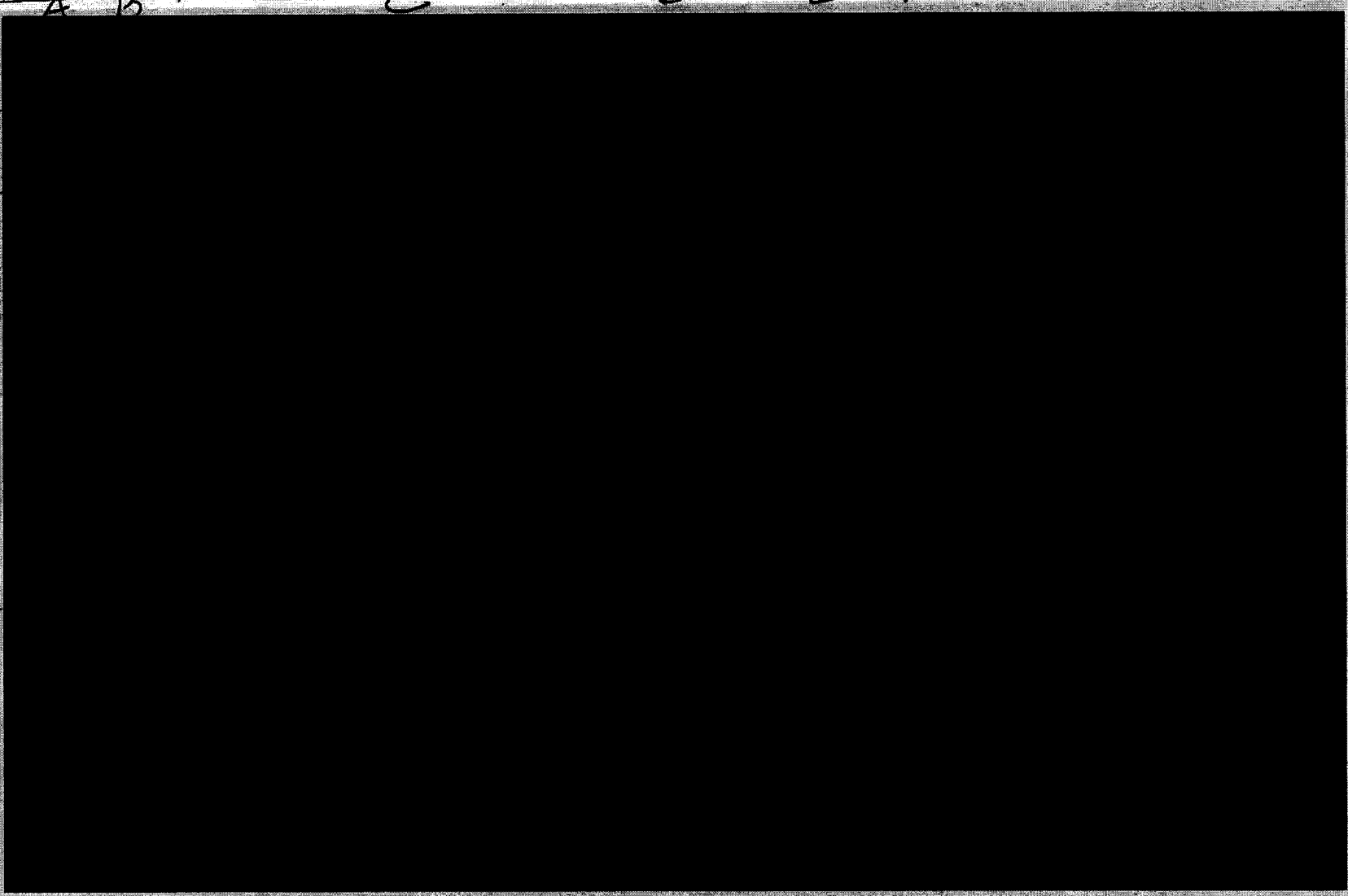
F

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~~434~~
7/14

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



43-49
8

SOURCE

Req. 1

PBC

434 p8

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

CONFIDENTIAL

FPL Derivative Settlements - Hedge Gas (April 2014)

Title Gas Settlements - April 2014
A B

C

D

E

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JHP
7/14

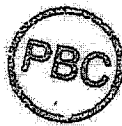
CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



43-4 p 9

SOURCE SOURCE

Apr. 1



9
43-4 p 9

CONFIDENTIAL

FPL Derivative Settlements - Hedge Gas (April 2014)

Title Gas Settlements - April 2014

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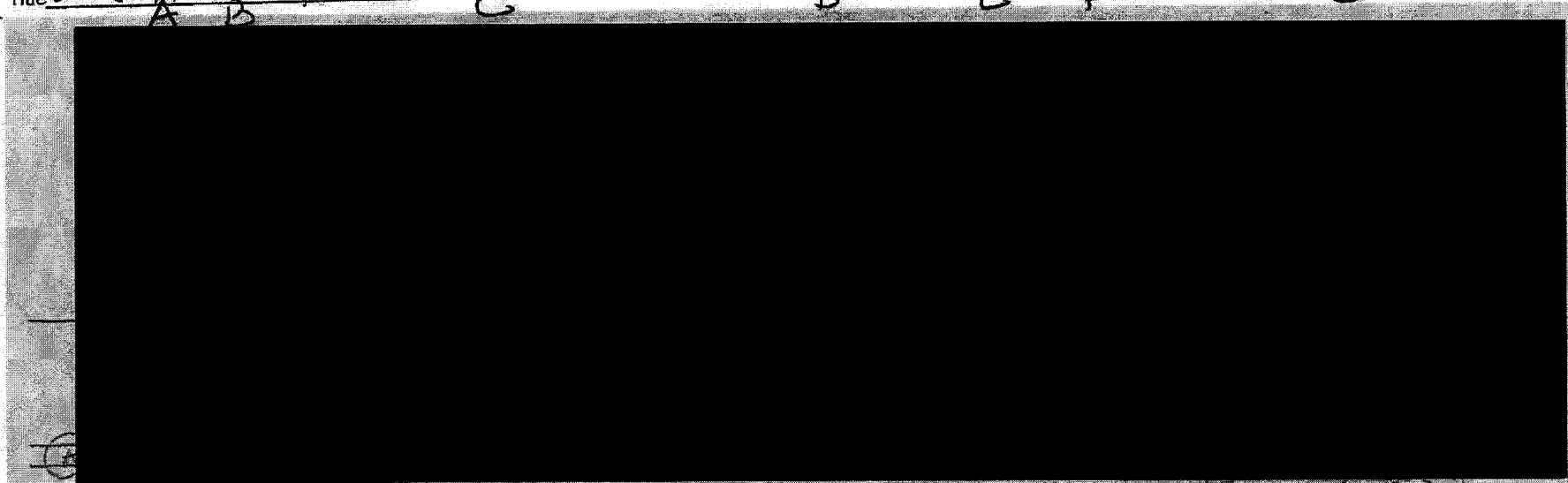
F

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H

JHP
7/14

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 1



43-207

43-2

(A) Agreed to invoices/purchase orders. Agreed the deal prices to the deal tickets, confirmation documents. Agreed the settlement/float price to the Platts - Gas daily - MEXX Henry Hub Futures contract publication. dtd. 3/28/14 - for April 2014.

(C) The deal ticket pricing was reviewed by performing a reasonableness calculation. See 43-3 2-1 for explanation of testing done and

(B) Agreed Gain to monthly Gas closing report 4/14 and to NG options/swaps incurred during mth report. Also to SE recording to Oct. 330,5000.

SOURCE Req. 1

PBC

sample documentation

10 2/2
43-4 p10

9/14/14
JHP
8/14

Hedging Audit 2014 – Docket No. 140001
Audit Request No. 3, Part 2

Title Transaction Fees

CONFIDENTIAL

Q: A statement explaining the treatment of transaction costs and brokerage fees...for the period August 1, 2013 – July 31, 2014. Provide the related invoices.

A: Currently, the only transaction costs incurred by FPL's financial hedging program are Intercontinental Exchange, Inc. (ICE) brokerage charges. [REDACTED] A
[REDACTED] B which
includes the market types Financial Gas and Physical Gas. Individual user traded
commissions are [REDACTED] C
regardless of the OTC market-traded.

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 – All Instruments reports. G/L account 2300000 is the FPL Fuel Inventory account.

*We traced the fees to the invoices for all
Gas purchase - EMT.
See Sept 1, 2013 invoice on 43-51*



Invoices

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Page 2 of 2

Title transaction fee

9/10/13
HP
8/14



ICE US OTC COMMODITY MARKETS, LLC INVOICES

Term: August 1, 2013 - Sunday, August 31, 2013

Account # 103
Florida Power & Light Company
Two Utilities Ave.
June Beach, FL 33408 USA

Company TPA# 24150
Invoice Date September 3, 2013

CONFIDENTIAL

Description	Invoice #	Total Price
OTC Commission/Activities	0113000193080	
Market Data Exchange Fees - ICE Euronext Europe	0010000193080	
Market Data Exchange Fees - ICE Futures U.S.	0113000193087	
Market Data Exchange Fees - ICE Futures Canada	0113000193080	
Index Master Fees	0010000193080	
Direct Connect Fees	0113000193082	
Commission Total:		
State Tax Total:		

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Please remit the Amount Due within 30 days after the end of the month. Please ensure bank checks are not deposited into the account due to ICE US OTC Commodity Markets, LLC. Payment should be made in the currency specified in the following table:

ICE US OTC Commodity Markets, LLC Company Identification Number (CIN) 00-355670
 In the form of a check made payable within 30 days to ICE US OTC Commodity Markets, LLC and sent to:
 ICE US OTC Commodity Markets, LLC
 PO Box 85877
 Atlanta, GA 31163-4377
 Question? Contact ICE Accounting at 1-800-451-1000 or ICE@ICE.COM

via Wire Transfer to ACH:
 Beneficiary Name: ICE US OTC Commodity Markets, LLC
 Beneficiary Bank Name: Wells Fargo
 Beneficiary Bank City and State: Atlanta, Georgia
 SWIFT Code #: WFLUS43
 Beneficiary Account #: 210002218
 Creditor Account #: 200004123910

Please quote the Invoice number when handling your remittance to ensure credit to your account.

Invoices \$10,000 and under can be paid by credit card using the button below.

Click Here for Credit Card Payment

Michelle Doery
 Michelle Doery
 Manager, Power & Fuels Accounting

ENTERED BY: SHARON PATRIE DATE: 9/20/13
 PHONE: (661)691-7897 COMPANY CODE: 1500
 AUTHORIZED BY: _____

REQUIRED IF UNDER \$250

SAP DOCUMENT #(S): 900220445
 ACCT NUMBER: See Attached for Coding

V-0000024322



<https://www.ice.com/reports/Invoice.shtml>

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 3, ITEM #2

9/13/2013
7/10
PB
43-5
P#

Florida Power & Light Company
 Hedging Activities
 Dkt# 140001-EI, ACN 14-083-4-1
 TYE 7/31/14

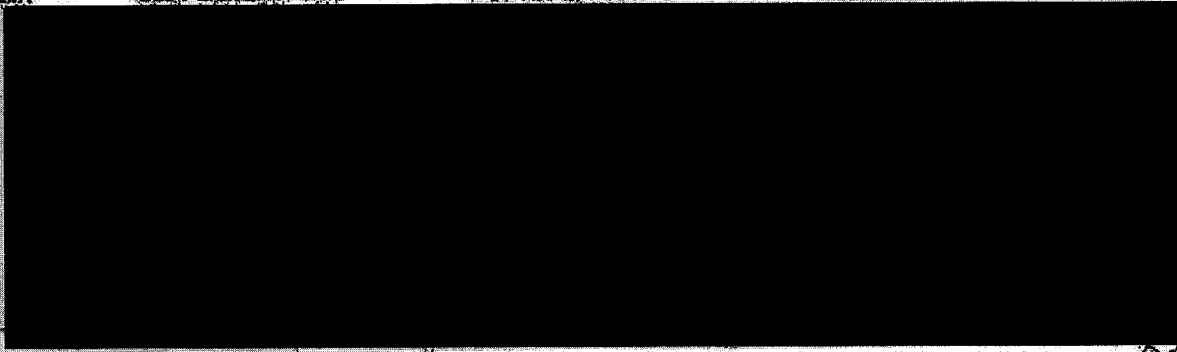
CONFIDENTIAL

JHP
8/14

Title Transaction Fee

A B C D E

G/L 5760220 I/O 6120000502	G/L 3305000 I/O 6370000482	G/L 5760220 I/O 6120000508	G/L 5760220 I/O 6120000582	TOTAL
Software Purchases	Accrued Fuel Expense	Software Purchases	Software Purchases	
FPL Electricity - EMT	Gas Purchases - EMT	FPL Gas Operations	Optimization	



- 2014010502-02

43-1

PI

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 3, ITEM #2

Att#13

- Art Morris Gas
- Bill Miller Gas
- Shirley Steff Gas
- John Gleber Gas
- Bill Murphy Gas
- Miguel Nieto Optimization
- Luther Hall Power
- Jerry Hidreth Optimization
- Raj Iyer Gas
- Lystra Loufan Gas
- Gerry Yupp Power/Gas
- Jeff Dunn Power
- Paul Zhang Gas



43-5
7/10

JHP

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

CONFIDENTIAL

JEP
8/14

Title Tolling Arrangements

Hedging Audit 2014 – Docket No. 140001
Audit Request No. 3, Part 3

Q: A statement regarding tolling arrangements...for the period August 1, 2013 – July 31, 3104.

A: FPL executed its 2012 hedging strategy, for the projected year of 2013, in accordance with the 2012 Risk Management Plan filed with the Commission (page no. 5, which addressed natural gas hedging has been included as part of this response). FPL executed its 2013 hedging strategy, for the projected year of 2014, in accordance with the 2013 Risk Management Plan filed with the Commission (page no. 5, which addressed natural gas hedging has been included as part of this response).

1
2
[REDACTED] A
The hedging results for the period from August 2013 to July 2014 are summarized in the Derivative Settlements reports provided in response to hedging audit request no. 1. Tolling arrangements were not utilized when hedging either 2013 or 2014 projected natural gas requirements.

43/

W-9



Hedging Audit 2014 - Docket No. 140001-EI
Audit Request No. 19

Florida Power & Light Company
Hedging Activities
DK# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

9/14/14
JHP
8/14

Title Lehman Settlement

Q:
Regarding Request 3, Part 5.

- 1) Please provide the termination agreement.
- 2) Was there any variance from the amounts paid by FPL back in 2010/2011? If so, provide detail and source documentation for recording to gl.
- 3) Were there any additional legal fees? If so, provide detail and source documentation for recording to gl.

CONFIDENTIAL

A:

- 1) The termination agreement has been included as part of this response.
- 2) There was no variance from the amounts paid by FPL pursuant to the letter agreement dated August 6, 2009.
- 3) There were no additional costs to FPL, including legal fees, associated with the termination agreement dated June 18, 2014.

DISCUSSED WITH Andy Dillman.

43-8 →
3

See 43-8
2

(up 50) /
we reviewed DK 100001-EI, Hedging Activities 8/2009-7/2010. Supporting documentation was provided for the Aug 2009- letter agreement (preliminary settlement). The amounts were recorded in the bus closing reports in various months and flowed through the fuel clause. No other amounts were anticipated at that time. During Oct 2009 outside legal fees were incurred and supporting documentation was provided. (Recorded to base O+H Acct 903)

(up 50) /
In DK 110001-EI, Hedging Activities, 8/2010-7/2011 other outside legal fees were incurred and supporting documentation was provided. (Recorded to O+H Acct 903 base).

In this audit we reviewed the termination agreement on 43-8/3. The utility explained no amounts were recorded in the utility books.

SOURCE (copy)

CONFIDENTIAL HEDGING REQUEST NO. 19



related to this agreement as of 9/2/14. In the next audit need to verify if any \$'s were recorded related to [redacted] 43-8

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 43-8/2-1

[Pages 1 through 2]

Lehman Settlement

Florida Power & Light Company
 Hedging Activities
 Dkt# 140001-EI, ACN 14-083-4-1
 TYE 7/31/14

CONFIDENTIAL

9/14/14
 9/14/14

FLORIDA POWER & LIGHT COMPANY
 FINE FINANCIAL REPORT
 CASH VOUCHER SOURCE

Title Lehman Settlement

FORM ORDER, DATE, GL ACCT, LOAN S/C, PO NUMBER, VENDOR
 FROM TO SELECTION CHARACTER
 GL ACCT: 232.138 - 232.138
 CASH LOAN: 0611 0611
 SAC:
 DELTY LOAN:
 VOUCHER:
 PO NUMBER: VENDOR:

LEDGER DATE: 200908 200908
 SOURCE:
 AMOUNT:
 REEL/BATCH:
 INTERFACE ID:
 PAYEE:

COMMENTS:

B.

DATE	GL ACCT	LOAN S/C	PO NUMBER	VENDOR	BAC DESCRIPTION	REEL C/NO	PAYEE NAME	QUANTITY	AMOUNT
200908	232.138	0611	52450	132518466-790	LEHMAN BROTHERS IM 450	9219	LEHMAN BROTHERS	.00	[REDACTED]
200908	232.138	0611	52450	650851428-790	NEXTERA ENERGY POW 450	8222	NEXTERA ENERGY	.00	
								340	
								6	

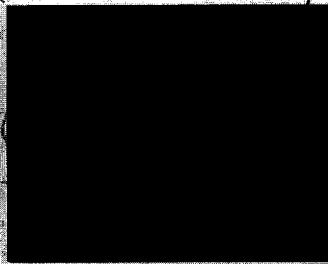
*****GRAND TOTAL
 **GL ACCT 232.138

43-8 / 2-1 / 1-1

A

43-8 / 2-1 P

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EPL calculated, estimated NET payment to Lehman
 - EPL calculated, estimated payment from Lehman to EPLM
 = EPL calculated, estimated payment from EPL to Lehman

This was removed in DK 100001-EI
 8/09 - 7/10.

PBC

43-8 / 2-1 / 1

Florida Power & Light Company
 Hedging Activities
 Dkt# 140001-EI, ACN 14-083-4-1
 TYE 7/31/14

CONFIDENTIAL

Title Lehman Seller

FPL Group Net Settlement Summary to Lehman Brothers

JHP
9/1/14

	A	B	C	D	E
	Settlement Calculation as of Sept 17	Interest (70 Days at 5%)	Total on 2/9/09 Settlement Statement	Incremental interest from initial 70 days through 2/9/09 @ 5%	Total Payment on 7/28/09
FPL 1					
NEPM 2					
Net FPL Group 3					
4					

payable (A) 43-8/2-1/1
 receivable (B) 11
 rounded (C) 11

VERIFIED

ITEM QUANTITY PRICE ADDITION PMT. DATE
 NO. 8/17/09
 DATE 8/17/09
 PRICE 1
 ADDITION 1
 PMT. DATE 8/17/09

SOURCE: CONFIDENTIAL HEDGING ADJUTI REQUEST NO. 19-FOLLOW UP

ENTERED BY: SHARON PATRIE DATE: 8/17/09
 PHONE: (551) 681-7897 COMPANY CODE: 1001
 AUTHORIZED BY: James Higgins
 REQUIRED IF UNDER \$2500

SAP DOCUMENT #(S): 1900065790
 ACCT NUMBER: 232-138-000000641-790

Melanie Ladd 8/17/09
 Melanie Ladd
 Manager, Power & Fuels Accounting

C. Michael Coster 8/17/09
 C. Michael Coster
 Director, Accounting & Planning
 FPL, Energy Marketing & Trading

PBC

PBC

43-8
2-1
1-1

JHP

Title Lehman Settlement

CONFIDENTIAL

Handwritten: 7/14

FPL Group Net Settlement Summary to Lehman Brothers:

	A Settlement Calculation as of Sept. 17	B Interest (70 Days at 5%)	C Total on 2/9/09 Settlement Statement	D Incremental Interest from initial 70 days through 2/9/09 @ 5%	E Total Payment on 7/28/09	
FPL	1					
✓ NEAM	2					payable (A)
Net FPL Group	3					receivable (B)
	4					rounded (C)

VERIFIED

ITEM	QUANTITY	DATE
Quantity	<u>8/10/09</u>	
PRICE		
ADDITION		
PMT. DATE		<u>8/10/09</u>

Handwritten: Metronia Ladd 8/10/09
Metronia Ladd
Manager, Power & Fuels Accounting

Handwritten: Same as p.1
differences
dates

ENTERED BY: SHARON PATRIE DATE: 8/10/09
PHONE: (561) 691-7897 COMPANY CODE: 1001
AUTHORIZED BY: _____

REQUIRED IF UNDER \$2500

SAP DOCUMENT # (S): 1900066355 ✓

ACCT NUMBER: 230-138-611-790 ✓



Handwritten: 8/11/09

SOURCE CONFIDENTIAL HEDGING AUDIT REQUEST NO. 19-FOLLOW UP

Handwritten: 43-5
2-1
1-1 ps

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 43-8/3

[Pages 1 through 7]

Lehman Settlement

Florida Power & Light Company
Hedging Activities
Dkt# 140001-EI, ACN 14-083-4-1
TYE 7/31/14

Hedging Audit 2014 - Docket No. 140001-EI
Hedging Audit Request No. 12, Part No. 2

Title Hedging Program Positions

JWP
8/14

A B C D E

CONFIDENTIAL

LATEST PROJECTION		HEDGING PROGRAM POSITIONS			
Date	Natural Gas MMBtus	Fuel Oil Bbls	Hedged (1) MMBtus	Hedged (2) Dollars	Hedged % (3)
August-13	7/8/2013				
September-13	8/5/2013				
October-13	9/3/2013				
November-13	10/7/2013				
December-13	11/4/2013				
January-14	12/2/2013				
February-14	1/6/2014				
March-14	2/3/2014				
April-14	3/8/2014				
May-14	4/7/2014				
June-14	5/5/2014				
July-14	6/2/2014				

The hedged %'s should fall within [redacted] no exception

1
2
3
4

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 12

- Note (1): Hedged volumes are based upon projected fuel burns
- Note (2): Hedged dollars represent a calculated notional value (trade price * volume purchased and/or sold).
- Note (3): 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 (4): Management approval can allow the hedged percentage to be outside of the tolerance bands in some cases.

43-4 P.10

⊗ - Agreed to Fuel Burn Summaries - current mth calculations
 X - Agreed to the Monthly Derivatives Settlement reports.
 # - recalculated by staff

SOURCE Reg 12



45-1

JWP

45-1

Florida Power & Light Company
 Hedging Activities
 DK# 140001-EI, ACN 14-083-4-1
 TYE 7/31/14

Hedging Audit 2014 - Doc# 140001-EI
 Audit Request No. 12 Part No. 3

Title Rebalancing Activities

CONFIDENTIAL

JEP
8/14

2013 HEAVY OIL REBALANCING ACTIVITY (August - December)													
Gen Trader Fuel Burn Forecast		Hedge Program Status Before Rebalancing			Rebalancing Activity					Hedge Program Status After Rebalancing			
Date	Volume (Bbls)	Volume Hedged	Percentage Hedged	Trade Date	Counterparty	Buy/Sell	Instrument	Volume	Begin Date	End Date	Price	Volume Hedged	Percentage Hedged
[REDACTED]													

2014 HEAVY OIL REBALANCING ACTIVITY (January - July)													
Gen Trader Fuel Burn Forecast		Hedge Program Status Before Rebalancing			Rebalancing Activity					Hedge Program Status After Rebalancing			
Date	Volume (Bbls)	Volume Hedged	Percentage Hedged	Trade Date	Counterparty	Buy/Sell	Instrument	Volume	Begin Date	End Date	Price	Volume Hedged	Percentage Hedged
NA													

per 45-3, FPL is not hedging oil in 2014, 42-1 p 6

2013 NATURAL GAS REBALANCING ACTIVITY (August - December)													
Gen Trader Fuel Burn Forecast		Hedge Program Status Before Rebalancing			Rebalancing Activity					Hedge Program Status After Rebalancing			
Date	Volume (Mmbtu)	Volume Hedged	Percentage Hedged	Trade Date	Counterparty	Buy/Sell	Instrument	Volume Per Day	Begin Date	End Date	Price	Volume Hedged	Percentage Hedged
NONE													

2014 NATURAL GAS REBALANCING ACTIVITY (January - July)													
Gen Trader Fuel Burn Forecast		Hedge Program Status Before Rebalancing			Rebalancing Activity					Hedge Program Status After Rebalancing			
Date	Volume (Mmbtu)	Volume Hedged	Percentage Hedged	Trade Date	Counterparty	Buy/Sell	Instrument	Volume Per Day	Begin Date	End Date	Price	Volume Hedged	Percentage Hedged
NONE													

CONFIDENTIAL HEDGING AUDIT REQUEST NO. 12

The hedged %'s on 45-1 indicate the %'s are within
 The targets of the tolerance bands per 45-3 p 1, 45-4!

SOURCE Reg 12



45-2

JEP

45-2

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 45-3

[Pages 1 through 5]

PPS

CONFIDENTIAL

2014 Risk Mng Plan Title Risk Mng Plan

9/14/14 JAP SK

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.

2014 Hedging Strategy (TFB-4, Items 2 and 8)

FPL plans to hedge a portion of its projected 2015 natural gas requirements during 2014. 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 2015 natural gas requirements within the Hedging Window during 2014. This hedge percentage is consistent with 2014 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. A B
- 2) FPL will utilize [redacted] to hedge its projected natural gas requirements. C
- 3) FPL will execute its natural gas hedges for 2015 from [redacted] through [redacted] as shown below: D

Hedging Window

[redacted]

During each month of the Hedging Window, FPL will hedge the percentages shown of its projected 2015 natural gas requirements. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.

- 4) FPL intends to rebalance its natural gas hedge positions during the year based on changes in forecasted market prices, projected unit outage schedules or changes in FPL's load forecast. Once the initial monthly target volumes have been hedged, rebalancing will be executed to maintain the hedge percentages inside approved tolerance bands. The monthly tolerance bands for natural gas are [redacted]. Therefore, the minimum and maximum monthly hedge percentages are [redacted] respectively. G 4/5-1

89



45-4 pi

CONFIDENTIAL

Title Risk Hedge Plan

9/14/14 JHP
8/14

2013
Risk Hedge
Plan

will substantially impair market functions); FPL will implement its hedging program within the following parameters:

Natural Gas

- 1) FPL will hedge approximately [redacted] ^A of its projected 2014 natural gas requirements within the Hedging Window during 2013. This hedge percentage is consistent with 2013 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 [redacted] ^C hedge its projected natural gas requirements.
- 3) FPL will execute its natural gas hedges for 2014 from [redacted] ^D through [redacted] ^E as shown below:

Hedging Window

6 [redacted]
7 [redacted]

During each month of the Hedging Window, FPL will hedge the percentages shown of its projected 2014 natural gas requirements. FPL will have flexibility within any given month to determine the appropriate timing for executing hedges.

- 4) FPL intends to rebalance its natural gas hedge positions during the year based on changes in forecasted market prices, projected unit outage schedules or changes in FPL's load forecast. Once the initial monthly target volumes have been hedged, rebalancing will be executed to maintain the hedge percentages inside approved tolerance bands. The monthly tolerance bands for natural gas are [redacted]. Therefore, the minimum and maximum monthly hedge percentages are [redacted] ^G respectively.

8
9

45-1

Heavy Fuel Oil

As explained below, FPL does not intend to hedge heavy fuel oil for 2014.

A number of factors have led to a large drop in FPL's heavy oil burn projections for 2014. Projections can vary drastically from actuals due to operational constraints, unit outages or unexpected weather conditions. However, with the modernized Cape Canaveral gas unit coming on line in 2013 and the modernized Riviera gas unit coming on line in 2014; it is reasonable to expect lower heavy oil consumption. FPL is currently estimating approximately 120,000 barrels of heavy oil consumption from May 2014 through October 2014. It is worth noting that 120,000 barrels of heavy oil consumption is equivalent to approximately 0.77 Bcf of natural gas consumption or, less than 1/2 day of typical gas usage in the summer period.



7/n

45-4 p2

EXHIBIT C

JUSTIFICATION TABLE

FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
 TITLE: FPL, Hedging Audit
 AUDIT CONTROL NO: 14-083-4-1
 DOCKET NO: 160001-EI
 DATE: March 14, 2016

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
2-1	Filing	10	Y N	Pgs. 1, 3, 5, 7, 9 Cols. C-F, Lns. 4-9 Pgs. 2, 4, 6, 8, 10	(e)	G. Yupp
2-2	Filing	8	Y	Pg. 1, Cols. C-D, Lns. 4-8, 11 Col. E, Lns. 4-8 Col. F, Lns. 4-7 Pgs. 2-8, Cols C-F, Lns. 4-8	(e)	G. Yupp
8	Board of Directors Minutes	8	Y Y Y N Y Y Y Y	Pg. 1, Lns. 1-8 Pg. 2, Lns. 1-9 Pg. 3, Lns. 1-19 Pg. 4 Pg. 5, Lns. 1-6 Pg. 6, Lns. 1-5 Pg. 7, Lns. 1-5 Pg. 8, Lns. 1-4	(e)	S. Seeley
8-1	Board of Directors Minutes	8	N Y N Y Y N	Pg. 1 Pg. 2, Lns. 1-2 Pgs. 3-4 Pg. 5, Lns. 1-4 Pg. 6, Lns. 1-17 Pgs. 7-8	(e)	S. Seeley
9	Internal Audit List	2	Y	Pg. 1, Col. A, Lns. 20a-20c Pg. 2, Col. A	(b)	A. Maceo
9-1	Internal Audit Notes	2	Y	ALL	(b)	A. Maceo
9-2	Internal Audit Notes	1	Y	ALL	(b)	A. Maceo

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
9-3	Internal Audit Notes	1	Y	ALL	(b)	A. Maceo
9-4	Internal Audit Notes	1	Y	ALL	(b)	A. Maceo
9-5	Internal Audit Notes	1	Y	ALL	(b)	A. Maceo
9-6	Internal Audit Notes	1	Y	ALL	(b)	A. Maceo
42-1	Risk Management	7	N Y N	Pgs. 1-4 Pg. 5, Lns. 1A, 2B, 3C, 4D, 5E, 6-7, 8F, 9G Pgs. 6-7	(e)	G. Yupp
43-1	Reconciliation of Filing	2	Y N	Pg. 1, Cols. A-C, Lns. 1-14 Col. D, Lns. 1-5 and 7-13 Pg. 2	(d), (e)	G. Yupp
43-2	Monthly Selection	1	Y	Cols. A-F	(d), (e)	G. Yupp
43-3	Derivative Settlements	10	Y	Pgs. 1-10, Cols. A-H	(d), (e)	G. Yupp
43-3/1	Invoice	5	Y	Pg. 1, Cols. A, Line 1 Col. B, Lns. 1-6 Cols. A-C, Line 7 Cols. D and E (Bank Acct Number redacted on Exhibits A and B) Pgs. 2-4, Cols. A-J Pg. 5, Lns. 1A and 2 (Bank Acct Number redacted on Exhibits A and B)	(d), (e)	G. Yupp
43-3/2	Purchase Statement	3	Y	Pg.1, Col. A, Lns. 1-7 Cols. B-I, Lns. 1-6 Col. J, Lns. 1-6 Col. K, Lns. 1-3 Pg. 2, Cols. A-H, Lns. 1-20 Col. I, Lns. 1-6 Pg. 3, Col A, Lns. 1 and 27 Cols. B-J, Lns. 1-26	(d), (e)	G. Yupp
43-3/2-1	Deal Ticket	1	Y	Col. A, Lns. 2, 3, 12, 15 and 16 Cols. B-D, Lns. 1-2 Col. E, Line 1 Cols. F-L	(d), (e)	G. Yupp
43-3/2-1/1	Deal price explanation	1	N			
43-3/2-1/1-1	NYMEX - Gas Daily	1	N			G. Yupp
43-3/2-2	NYMEX - Gas Daily	1	N			G. Yupp
43-4	Derivative Settlements	10	Y	Pgs. 1-10, Cols. A-H	(d), (e)	G. Yupp
43-5	Transaction Fee	1	Y	Lns. 1A, 2B and 3C	(d), (e)	G. Yupp
43-5/1	Transaction Fee	2	Y	Pg. 1, Col. A, Lns. 1-9	(d), (e)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
				Pg. 2, Cols. A-E, Lns. 1-13		
43-6	Tolling Agreements	1	Y	Lns. 1A and 2B	(e)	G. Yupp
43-7	Physical Hedging	1	N			G. Yupp
43-8	Lehman Settlement	1	N			G. Yupp
43-8/1	Lehman Settlement	1	Y	Line 1A	(d)	G. Yupp
43-8/2	Lehman Settlement	1	N			G. Yupp
43-8/2-1	Lehman Settlement	2	Y	ALL	(d)	G. Yupp
43-8/2-1/1	Lehman Settlement	1	Y	Col. A, Lns. 1-3 Col. B, Lns. 1-6	(d)	G. Yupp
43-8/2-1/1-1	Lehman Settlement	2	Y	Pgs. 1-2, Cols. A-D, Lns. 1-3 Col. E, Lns. 1-4	(d), (e)	G. Yupp
43-8/3	Lehman Settlement	7	Y	ALL	(d)	G. Yupp
43-9	Affiliate Related	1	N			G. Yupp
44-1	NextEra Policy	1	N			G. Yupp
44-2	EMT Procedures	1	N			G. Yupp
44-3	SOX compliance	1	N			G. Yupp
44-4	Separation of Duties	2	N			G. Yupp
45-1	Hedging Program Positions	1	Y	Cols. A-D, Lns. 2-13 Col. E, Lns. 1-13 Col. F, Lns. 1-4	(d), (e)	G. Yupp
45-2	Rebalancing	1	Y	Line 1	(d), (e)	G. Yupp
45-3	PPS	5	Y	ALL	(e)	G. Yupp
45-4	Risk Management	2	Y	Pgs. 1-2, Lns. 1A, 2B, 3C, 4D, 5E, 7, 8F and 9G	(e)	G. Yupp

EXHIBIT D

DECLARATIONS

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: 160001-EI

STATE OF FLORIDA)
)
COUNTY OF MIAMI-DADE)

WRITTEN DECLARATION OF ANTONIO MACEO

1. My name is Antonio Maceo. I am currently employed by Florida Power & Light Company ("FPL") as Manager, Internal Auditing. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 14-083-4-1. 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 2013. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-14-0560-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of at least an additional eighteen (18) months. 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: _____

3/7/16

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: 160001-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

WRITTEN DECLARATION OF GERARD J. YUPP

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

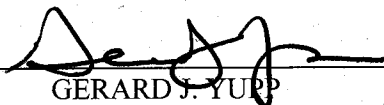
2. I have reviewed the documents referenced and incorporated in FPL's First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 14-083-4-1. The documents or materials that I have reviewed, and which are asserted by FPL to be proprietary confidential business information, contain or constitute data pertinent to FPL's procurement activities and hedging program. Specifically, the documents contain or constitute proprietary FPL strategies, 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 decisions, 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 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. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

5. Nothing has occurred since the issuance of Order No. PSC-14-0560-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of at least an additional eighteen (18) months. 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 that the facts stated in it are true to the best of my knowledge and belief.


GERARD J. YURP

Date: 3 / 7 / 16

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: 160001-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

DECLARATION OF WILLIAM SCOTT SEELEY

1. My name is William Scott Seeley. I currently serve as Vice President, Compliance & Corporate Secretary of NextEra Energy, Inc. ("NEE") and Florida Power & Light Company ("FPL"). I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 14-083-4-1. The materials I have reviewed, and which are asserted by NextEra Energy and FPL to be proprietary confidential business information, contain or constitute competitively sensitive information, the disclosure of which could impair NextEra Energy's or FPL's competitive positions. Specifically, the information includes NextEra Energy Board of Directors' highly confidential discussions and presentations which describe business plans, strategies or dividend policy. Some of the materials relate to personal employee information. To the best of my knowledge, NextEra Energy and FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-14-0560-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of at least an additional eighteen (18) months. 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.



WILLIAM SCOTT SEELEY

Date: 3/11/2016