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## STATE OF FLORIDA

Office of the General Counsel Keith C. Hetrick General Counsel (850) 413-6199

## **Public Service Commission**

April 28, 2016

John T. Butler 700 Universe Boulevard Juno Beach, Florida 33408 john.butler@fpl.com **STAFF'S FIRST DATA REQUEST** *via email* 

**Re:** Docket No. 160096-EI - Joint petition for approval of modifications to risk management plans by Duke Energy Florida, Florida Power & Light Company, Gulf Power Company and Tampa Electric Company.

Dear Mr. Butler:

By this letter, the Commission staff requests that Florida Power & Light Company (FPL) provide responses to the following data requests.

- 1. Please refer to paragraphs 10 and 11 of the petition and to Exhibits 1 through 4. Explain the reasoning and analysis supporting FPL's proposed reduced hedging targets.
- 2. Explain the risks and benefits to customers, if any, of FPL's proposed reduced hedging targets.
- 3. Please refer to paragraph 12 of the petition and to Exhibits 1 through 4. Explain the reasoning and analysis supporting the proposed limit on the future time horizon over which hedges may be placed.
- 4. Explain the risks and benefits to customers, if any, of the proposed limit on the future horizon over which hedges may be placed.
- 5. Has FPL analyzed the potential effects on 2016 and 2017 customers' bills of the proposed modifications to the risk management plans? If yes, please explain.
- 6. Will the proposed modifications reduce the benefits and costs of hedging? Please explain any analysis that estimates the effects of the proposed changes.
- 7. Will the proposed modifications reduce the administrative costs of the hedging program for the remainder of 2016 and for 2017 assuming approval? Please explain.

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- 8. Please refer to the last two sentences of paragraph 5 of the petition. How would the factors listed in the last sentence cause the downward trend in natural gas prices to change or reverse?
- 9. Please refer to last sentence of paragraph 8. As of the time of this interrogatory, what percentage of FPL's hedges for 2017 procurement has been executed?
  - a. For FPL, please refer to Exhibit 2, page 6, and to the sentence "FPL will not financially hedge its projected natural gas requirements beyond the end of calendar year 2017."
  - b. Please explain this sentence and its effect.
- 10. Based on this sentence, for the 2017 Risk Management Plan, FPL will not hedge its projected natural gas requirements beyond the end of 2018. Is the correct? Please explain.
- 11. If the hedging contracts in place for 2015 for FPL had been reduced by 25%, how much would FPL have saved compared to actual results? Please state any assumptions that might underlie this calculation.
- 12. What natural gas hedging savings (costs) and hedging volumes have been incurred by FPL for the period January-March, 2016?
- 13. If the proposed reductions detailed in the Joint Petition would have been in place during the January-March 2016 period, what natural gas hedging savings (costs) would FPL have incurred?
- 14. What natural gas hedging savings (costs) and hedging volumes is FPL estimating for the period April-December 2016?
- 15. If the proposed reductions detailed in the Joint Petition would have been in place during the April-December 2016 period, what are the estimated natural gas hedging savings (costs)?

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Please file all responses electronically no later than Monday, May 9, 2016 from the Commission's website at <u>www.floridapsc.com</u>, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6218 if you have any questions.

Sincerely,

/s/ Suzanne Brownless

Suzanne Brownless Senior Attorney

SBr/as

cc: Office of Commission Clerk Duke Energy Florida, LLC (Bernier) Florida Power & Light Company (Moncada) Tampa Electric Company (Beasley, Wahlen, Daniels) Gulf Power Company (Stone, Badders, Griffin) Office of Public Counsel (Kelly, Sayler)