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April 3, 2017

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

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COMMISSION
CLERK

Re: Docket No. 170001-EI

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Certain Information Contained in Hedging Activity Report, submitted as Exhibit GJY-3 to the prepared direct testimony of FPL witness Gerard J. Yupp. The request includes Exhibits A, B (two copies), C and D.

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

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

REDACTED

Sincerely,

Maria J. Moncada

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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: 160001-EI

Filed: April 3, 2017

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF CERTAIN
INFORMATION CONTAINED IN HEDGING ACTIVITY REPORT (Exhibit GJY-3)**

Florida Power & Light Company ("FPL"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, requests confidential classification of certain information contained in FPL's Hedging Activity Report, submitted as Exhibit GJY-3 to the prepared testimony of Gerard J. Yupp (the "Confidential Information"). In support of its Request, FPL states as follows:

1. On April 3, 2017, FPL filed the testimony of Gerard J. Yupp, including Exhibit GJY-3, in support of its 2016 Hedging Activity True-up Report. Exhibit GJY-3 contains information of a confidential nature. Pursuant to Rule 25-22.006(3)(a), F.A.C., FPL files this Request for Confidential Classification.

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

a. Exhibit A consists of a copy of Exhibit GJY-3, in which all of the Confidential Information that FPL asserts is entitled to confidential treatment has been highlighted.

b. Exhibit B consists of a copy of Exhibit GJY-3 in which all of the Confidential Information that FPL asserts is entitled to confidential treatment has been redacted.

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

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

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

4. FPL's Fuel Hedging Activity Report contains or constitutes data pertinent to FPL's fuel hedging program. Specifically, the Hedging Activity Report provides the physical and financial details related to FPL's year-to-date hedging results for natural gas.

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

6. Additionally, disclosure of the information would impair the competitive interests of FPL and would place FPL at a competitive disadvantage when coupled with other information that is publicly available. This information is protected by Sections 366.093(3) (e), F.S.

7. Upon a finding by the Commission that the Confidential Information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), F.S., such materials should not be declassified for at least eighteen (18) months and should be returned

to FPL as soon as the information is no longer necessary for the Commission to conduct its business. § 366.093(4), Fla.Stat.

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

Respectfully submitted this 3rd day of April 2017.

R. Wade Litchfield, Esq.,
Vice President and General Counsel
John T. Butler, Esq.
Assistant General Counsel-Regulatory
Maria J. Moncada, Esq.
Senior Attorney
Florida Power & Light Company
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Telephone: (561) 304-5795
Facsimile: (561) 691-7135

By: _____


Maria J. Moncada
Fla. Bar No. 0773301

CERTIFICATE OF SERVICE

Docket No. 170001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification* has been furnished by electronic service on this 3rd day of April 2017 to the following:

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By:



Maria J. Moncada
Fla. Bar No. 0773301

* The exhibits to this Request are not included with the service copies. A redacted version of Exhibit GJY-3 (Exhibit B) is included with the testimony of Mr. Yupp that is being served on all parties, and copies of Exhibits C and D are available upon request.

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)					
<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
YEAR-TO-DATE (JAN - DEC) 2016	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]			\$ (223,649,160)
AVERAGE PERIOD OF HEDGE (Days) - FINANCIAL		[REDACTED]			

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		VOLUME (MMBTU)		E	SAVINGS/(COSTS)	
<u>PERIOD</u>	<u>INSTRUMENT</u>	C	D			OPTION PREMIUMS
January-2016	FIXED PRICE TRANSACTIONS					
	SWAPS					
	OVER-THE-COUNTER OPTIONS					
	BROKER FEES					

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		VOLUME (MMBTU)		E	F	
<u>PERIOD</u>	<u>INSTRUMENT</u>	C	D			OPTION PREMIUMS
February-2016	FIXED PRICE TRANSACTIONS					
	SWAPS					
	OVER-THE-COUNTER OPTIONS					
	BROKER FEES					

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

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<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>VOLUME (MMBTU)</u>			
		<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
April-2016	FIXED PRICE TRANSACTIONS				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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

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		VOLUME (MMBTU)			
<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
June-2016	FIXED PRICE TRANSACTIONS				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

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

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

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<u>PERIOD</u>	<u>INSTRUMENT</u>	VOLUME (MMBTU)		PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
September-2016	FIXED PRICE TRANSACTIONS						
	SWAPS						
	OVER-THE-COUNTER OPTIONS						
	BROKER FEES						

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

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		VOLUME (MMBTU)		E	F	
<u>PERIOD</u>	<u>INSTRUMENT</u>	C	D			OPTION PREMIUMS
November-2016	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES					

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A	B	FPL NATURAL GAS PROCUREMENT				F
		C	D	E		
PERIOD	INSTRUMENT	VOLUME (MMBTU)		OPTION PREMIUMS	SAVINGS/(COSTS)	
		PURCHASES	SALES			
December-2016	FIXED PRICE TRANSACTIONS					
	SWAPS					
	OVER-THE-COUNTER OPTIONS					
	BROKER FEES					

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with
Generating Performance Incentive Factor
DOCKET NO: 170001-EI
SUBJECT: Fuel Hedging True-up Results
DATE: April 3, 2017

Page No.	Description	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
1	FPL Natural Gas Procurement (Jan - Dec 2016)	Cols. C and D, Lines 4-8, 11 Col. E, Lines 4-8 Col. F, Lines 4-7	(d), (e)	G. Yupp
2	FPL Natural Gas Procurement January 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
3	FPL Natural Gas Procurement February 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
4	FPL Natural Gas Procurement March 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
5	FPL Natural Gas Procurement April 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
6	FPL Natural Gas Procurement May 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
7	FPL Natural Gas Procurement June 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
8	FPL Natural Gas Procurement July 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
9	FPL Natural Gas Procurement August 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp

Page No.	Description	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
10	FPL Natural Gas Procurement September 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
11	FPL Natural Gas Procurement October 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
12	FPL Natural Gas Procurement November 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp
13	FPL Natural Gas Procurement December 2016	Cols. C-F, Lines 4-8	(d), (e)	G. Yupp

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 170001-EI

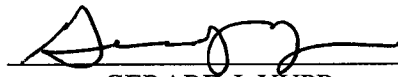
DECLARATION OF GERARD J. YUPP

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 Division. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification of Fuel Hedging Information. The documents and materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute data pertinent to FPL's hedging program. Specifically, the documents contain information regarding the physical and financial details related to FPL's monthly hedging results for natural gas. The disclosure of this information would provide other participants in the fuel and financial markets insight into FPL's hedging practices that would allow them to anticipate FPL's trading decisions and impair FPL's ability to negotiate for these commodities, to the detriment of FPL and its customers. Further, disclosure would impair the competitive interests of FPL and would place FPL at a competitive disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

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

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



GERARD J. YUPP

Date: 3/24/17