



Maria J. Moncada
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5795
(561) 691-7135 (Facsimile)
E-mail: maria.moncada@fpl.com

August 18, 2017

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED-FPSC
2017 AUG 18 PM 2:48
COMMISSION
CLERK

Re: Docket No. 20170001-EI

Dear Ms. Stauffer:

REDACTED

I enclose for filing in the above docket FPL's Request for Confidential Classification of Certain Information Contained in Hedging Activity Report (Exhibit GJY-4). The Request includes Exhibits A through D.

Exhibit A contains the confidential information that is the subject of FPL's Request for Confidential Classification. Exhibit A is submitted for filing separately and marked "EXHIBIT A" – CONFIDENTIAL. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C contains FPL's justification for its Request for Confidential Classification. Exhibit D contains a declaration in support of FPL's Request. In accordance with Rule 25.22.006(3)(d), FPL requests confidential treatment of the information in Exhibit A pending disposition of FPL's request for Confidential Classification.

If there are any questions regarding this transmittal, please contact me at (561) 304-5795.

Sincerely,


Maria J. Moncada

Enclosures
cc: parties of record, w/o exhibits

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20170001-EI
Filed: August 18, 2017

**FLORIDA POWER AND LIGHT COMPANY'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF CERTAIN INFORMATION
CONTAINED IN THE FUEL HEDGING ACTIVITY REPORT (EXHIBIT GJY-4)**

Florida Power & Light Company ("FPL"), pursuant to Rule 25-22.006, F.A.C., and Section 366.093, Florida Statutes, requests confidential classification of certain information contained in FPL's Fuel Hedging Activity Report. In support of its Request, FPL states as follows:

1. Pursuant to Order No. PSC-08-0316-PAA-EI, issued on May 14, 2008, FPL filed its Fuel Hedging Activity Report on August 18, 2017, which will be adopted as exhibit GJY-4 in the testimony of FPL witness Gerard J. Yupp in FPL's 2017 Fuel and Capacity Projection Filing in this docket. FPL's Fuel Hedging Activity Report contains FPL proprietary confidential business information regarding market comparisons and hedging activities. This request is intended to request confidential classification of information contained in the Fuel Hedging Activity Report.

2. The following exhibits are included with this Request:

a. Exhibit A is a copy of the Fuel Hedging Activity Report, in which the confidential information has been highlighted.

b. Exhibit B consists of two copies of the Fuel Hedging Activity Report in which the confidential information has been redacted.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A, together with references to the specific statutory bases for the claim of confidentiality and to the affidavit in support of the requested confidential classification.

d. Exhibit D consists of the declaration of Gerard J. Yupp, Senior Director of Wholesale Operations for FPL's Energy Marketing and Trading Division in support of this Request for Confidential Classification.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and it 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. 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 Section 366.093(3)(d), Fla. Stat.

5. Additionally, disclosure of the information would impair the competitive interests of FPL and its affiliates, and would place FPL and its affiliates at a competitive disadvantage when coupled with other information that is publicly available. This information is protected by Section 366.093(3)(e), Fla. Stat.

6. 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), Fla.

Stat., 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. Section 366.093(4), Fla. Stat.

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

Respectfully submitted this 18th day of August 2017.

R. Wade Litchfield, Esq.,
Vice President and General Counsel
John T. Butler, Esq.
Assistant General Counsel-Regulatory
Maria J. Moncada, Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135

By: _____


Maria J. Moncada
Fla. Bar No. 773301

CERTIFICATE OF SERVICE
Docket No. 20170001-EI

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification has been furnished by electronic mail this 18th day of August 2017 to the following:

Suzanne Brownless, Esq.
Danijela Janjic, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us
djanjic@psc.state.fl.us

Andrew Maurey
Michael Barrett
Division of Accounting and Finance
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
amaurey@psc.state.fl.us
mbarrett@psc.state.fl.us

Beth Keating, Esq.
Gunster Law Firm
Attorneys for Florida Public Utilities Corp.
215 South Monroe St., Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com

Dianne M. Triplett, Esq.
Attorneys for Duke Energy Florida
299 First Avenue North
St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com

James D. Beasley, Esq.
J. Jeffrey Wahlen, Esq.
Ausley & McMullen
Attorneys for Tampa Electric Company
P.O. Box 391
Tallahassee, Florida 32302
jbeasley@ausley.com
jwahlen@ausley.com

Russell A. Badders, Esq.
Steven R. Griffin, Esq.
Beggs & Lane
Attorneys for Gulf Power Company
P.O. Box 12950
Pensacola, Florida 32591-2950
rab@beggslane.com
srg@beggslane.com

Robert Scheffel Wright, Esq.
John T. LaVia, III, Esq.
Gardner, Bist, Wiener, et al
Attorneys for Florida Retail Federation
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

James W. Brew, Esq.
Laura A. Wynn, Esq.
Attorneys for PCS Phosphate - White Springs
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201
jbrew@smxblaw.com
laura.wynn@smxblaw.com

Jeffrey A. Stone
Rhonda J. Alexander
Gulf Power Company
One Energy Place
Pensacola, Florida 32520
jastone@southernco.com
rjalexad@southernco.com


Matthew R. Bernier, Esq.
Duke Energy Florida
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
matthew.bernier@duke-energy.com

J. R. Kelly, Esq.
Patricia Christensen, Esq.
Charles Rehwinkel, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Mike Cassel
Director/Regulatory and Governmental Affairs
Florida Public Utilities Company
911 South 8th Street
Fernandina Beach, Florida 32034
mcassel@fpuc.com

Paula K. Brown, Manager
Tampa Electric Company
Regulatory Coordinator
Post Office Box 111
Tampa, Florida 33601-0111
regdept@tecoenergy.com

Jon C. Moyle, Esq.
Moyle Law Firm, P.A.
Attorneys for Florida Industrial Power
Users Group
118 N. Gadsden St.
Tallahassee, Florida 32301
jmoyle@moylelaw.com



Maria J. Moncada
Fla. Bar No. 773301

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

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1						
2						
3						
4	YEAR-TO-DATE	FIXED PRICE TRANSACTIONS				
5	(JAN - JULY) 2017	SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
8						\$ 42,207,214
9						
10						
11		AVERAGE PERIOD OF HEDGE (Days) - FINANCIAL				

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1						
2						
3						
4	January-2017	FIXED PRICE TRANSACTIONS				
5		SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
8						
9						
10						
11						

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1						
2						
3						
4	February-2017	FIXED PRICE TRANSACTIONS				
5		SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
8						
9						
10						
11						

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1	March-2017	FIXED PRICE TRANSACTIONS				
2		SWAPS				
3		OVER-THE-COUNTER OPTIONS				
4		BROKER FEES				
5						
6						
7						
8						
9						
10						
11						

1
2
3
4
5
6
7
8
9
10
11

A	B	C	D	E	F
FPL NATURAL GAS PROCUREMENT					
VOLUME (MMBTU)					
<u>PERIOD</u>	<u>INSTRUMENT</u>	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
April-2017	FIXED PRICE TRANSACTIONS	[REDACTED]			
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

1
2
3
4
5
6
7
8
9
10
11

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>
May-2017	FIXED PRICE TRANSACTIONS				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1						
2						
3						
4	June-2017	FIXED PRICE TRANSACTIONS				
5		SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
8						
9						
10						
11						

1
2
3
4
5
6
7
8
9
10
11

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>
July-2017	FIXED PRICE TRANSACTIONS				
	SWAPS				
	OVER-THE-COUNTER OPTIONS				
	BROKER FEES				

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1						
2						
3						
4	YEAR-TO-DATE	FIXED PRICE TRANSACTIONS				
5	(JAN - JULY) 2017	SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
8						\$ 42,207,214
9						
10						
11		AVERAGE PERIOD OF HEDGE (Days) - FINANCIAL				

1
2
3
4
5
6
7
8
9
10
11

A	B	C	D	E	F
FPL NATURAL GAS PROCUREMENT					
VOLUME (MMBTU)					
<u>PERIOD</u>	<u>INSTRUMENT</u>	PURCHASES	SALES	OPTION PREMIUMS	SAVINGS/(COSTS)
January-2017	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

	A	B	C	D	E	F
1				FPL NATURAL GAS PROCUREMENT		
2				VOLUME (MMBTU)		
3	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
4	February-2017	FIXED PRICE TRANSACTIONS				
5		SWAPS				
6		OVER-THE-COUNTER OPTIONS				
7		BROKER FEES				
8						
9						
10						
11						

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1	March-2017	FIXED PRICE TRANSACTIONS				
2		SWAPS				
3		OVER-THE-COUNTER OPTIONS				
4		BROKER FEES				
5						
6						
7						
8						
9						
10						
11						

1
2
3
4
5
6
7
8
9
10
11

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>
April-2017	FIXED PRICE TRANSACTIONS SWAPS OVER-THE-COUNTER OPTIONS BROKER FEES	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1						
2						
3	May-2017	FIXED PRICE TRANSACTIONS				
4		SWAPS				
5		OVER-THE-COUNTER OPTIONS				
6		BROKER FEES				
7						
8						
9						
10						
11						

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1	June-2017	FIXED PRICE TRANSACTIONS				
2		SWAPS				
3		OVER-THE-COUNTER OPTIONS				
4		BROKER FEES				
5						
6						
7						
8						
9						
10						
11						

	A	B	C	D	E	F
			FPL NATURAL GAS PROCUREMENT			
			VOLUME (MMBTU)			
	<u>PERIOD</u>	<u>INSTRUMENT</u>	<u>PURCHASES</u>	<u>SALES</u>	<u>OPTION PREMIUMS</u>	<u>SAVINGS/(COSTS)</u>
1	July-2017	FIXED PRICE TRANSACTIONS				
2		SWAPS				
3		OVER-THE-COUNTER OPTIONS				
4		BROKER FEES				
5						
6						
7						
8						
9						
10						
11						

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
DOCKET NO: 20170001-EI
DATE: August 18, 2017

Description	Page No.	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Year to Date Jan-July 2017 FPL Natural Gas Procurement	1	Lns 4-7, Cols C-F, Line 8, Cols C-E Line 11, Cols C-D	(d), (e)	G. J. Yupp
January 2017 FPL Natural Gas Procurement	2	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
February 2017 FPL Natural Gas Procurement	3	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
March 2017 FPL Natural Gas Procurement	4	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
April 2017 FPL Natural Gas Procurement	5	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
May 2017 FPL Natural Gas Procurement	6	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
June 2017 FPL Natural Gas Procurement	7	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp
July 2017 FPL Natural Gas Procurement	8	Cols C-F, Lns 4-8	(d), (e)	G. J. Yupp

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20170001-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 written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification of the Fuel Hedging Activity Report. 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 financial details related to FPL's year-to-date hedging results for natural gas. This information, if disclosed, would impair the efforts of FPL to contract for goods and services on favorable terms for the benefit of its customers, would impair the competitive interests of FPL and its vendors, and would place FPL at a competitive disadvantage when coupled with other information that is publicly available.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, the materials 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: 8/15/17