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October 4, 2018

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

REDACTED

RECEIVED-FPSC
2018 OCT -4 AM 11:19
COMMISSION
CLERK

Re: Docket No. 20180001-EI

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Third Request for Extension Confidential Classification of Materials Provided Pursuant to Audit No. 13-102-4-1. The request includes Second Revised Exhibits A, B (two copies), C and Third Revised Exhibit D.

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

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

Sincerely,

Maria J. Moncada

COM ___
AFD ___
APA 1 Exh B
ECO ___
ENG ___
GCL ___
IDM ___
CLK ___

Enclosure

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20180001-EI

Date: October 4, 2018

**FLORIDA POWER & LIGHT COMPANY'S THIRD REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 13-102-4-1**

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 Third Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 13-102-4-1 ("Confidential Information"). In support of this request, FPL states as follows:

1. On October 8, 2013, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("October 8, 2013 Request"). By Order No. PSC-13-0593-CFO-EI, dated November 1, 2013 ("Order 0593"), the Commission granted FPL's October 8, 2013 Request. FPL adopts and incorporates by reference the October 8, 2013 Request and Order 0593.

2. By Order No. PSC-15-0373-CFO-EI, dated September 10, 2015 ("Order 0373"), the Commission granted FPL's First Request for Confidential Classification.

3. On February 10, 2017, FPL filed its Second Request for Confidential Classification, which included First Revised Exhibit A, First Revised Exhibit B, First Revised Exhibit C and Second Revised Exhibit D ("February 10, 2017 Request"). By Order No. PSC-17-0120-CFO-EI, dated April 4, 2017 ("Order 0120"), the Commission granted FPL's February 10, 2017 Request. FPL adopts and incorporates by reference the February 10, 2017 Request and Order 0120.

4. The period of confidential treatment granted by Order 0120 will soon expire. Some of the Confidential Information that was the subject of FPL's February 10, 2017 Request and Order 0120 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its Third Request for Extension of Confidential Classification.

5. Included with this Request are Second Revised Exhibit A, Second Revised Exhibit B, together with Second Revised Exhibit C to reduce the number of pages for which confidential treatment is sought, and Third Revised Exhibit D.

6. Second 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 Second Revised Exhibit B.

7. Second Revised Exhibit C is a table that identifies the specific pages, lines or columns that remain confidential. The table also references the specific statutory basis for confidentiality and the declarants who support the requested classification.

8. Third Revised Exhibit D contains the declarations of Antonio Maceo and Gerard J. Yupp in support of this request.

9. 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.

10. As more fully described in the declarations included in Third Revised Exhibit D, certain documents provided by FPL contain proprietary confidential information related to trade secrets. This information is protected by Section 366.093(3)(a), Fla. Stat.

11. Also, certain documents contain information regarding internal auditing controls, reports or notes of internal auditors, or information relating to internal audit reports. This information is protected by Section 366.093(3)(b), Fla. Stat.

12. Additionally, certain documents contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its vendors to contract for goods and services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

13. Last, certain information in these documents and materials concern FPL's competitive interests and would place FPL at a disadvantage when coupled with the other information that is publicly available. This information is protected by Section 366.093(3)(e), Fla. Stat.

14. Pursuant Section 366.093(4), F.S., the information for which confidential classification is granted remains protected from disclosure up to 18 months unless good cause is shown to grant protection from disclosure for a longer period. Currently, the Commission retains audit reports for period of seven years at which time the audit materials are returned to FPL unless Commission staff or another affected person requests that these audit materials continue to be retained. The nature of these materials will not change in the next three years. Therefore, to promote administrative efficiency, FPL requests confidential classification for a period of

thirty-six (36) months. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional thirty-six (36) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. See § 366.093(4), Fla. Stat.

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

Respectfully submitted,

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By: 

Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 20170001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Second Request for Extension of Confidential Classification* has been furnished by electronic service on this 4th day of October, 2018 to the following:

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Maria J. Moncada
Florida Bar No. 0773301

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

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**SECOND REVISED
EXHIBIT A**

**CONFIDENTIAL
FILED UNDER SEPARATE COVER**

**SECOND REVISED
EXHIBIT B**

REDACTED COPIES

PBC

FPSC HEDGING AUDIT
REQUEST NO. 1#2

Florida Power & Light
Hedging Activities
Dkt #130001-EI ACN 13-102-4-1
TYE 8/1/2012 to 7/31/2013

2012-2013 AUDIT REPORTS
PSC Request #1

KW 9/11/13
CONFIDENTIAL
JHP
PBC

August 2012 through June 30, 2013

Title: List of Confidential Audits

| | | |
|-----|--|----------|
| 1. | [REDACTED] ^A | 8/8/12 |
| 2. | [REDACTED] ^A | 8/15/12 |
| 3. | SOX 07.18.00 NEPM - FPL CONTRACTS - LEGAL REVIEW OF NETTING FLAGS - EMT | 8/24/12 |
| 4. | [REDACTED] ^A | 9/10/12 |
| 5. | REVIEW OF SOLAR REBATE PROGRAM CONTROLS | 9/10/12 |
| 6. | REVIEW OF FAILOVER PROCESSES AT LFO | 9/12/12 |
| 7. | REVIEW OF [REDACTED] ^A | 9/12/12 |
| 8. | REVIEW OF [REDACTED] ^A MONITORING PROCESS AT [REDACTED] ^B | 9/12/12 |
| 9. | REVIEW OF [REDACTED] ^A AT LFO | 9/12/12 |
| 10. | [REDACTED] ^A VENDOR AUDIT | 9/13/12 |
| 11. | SANFORD SERVICE CENTER [REDACTED] ^A | 9/13/12 |
| 12. | REVIEW [REDACTED] ^A AT LFO | 9/21/12 |
| 13. | [REDACTED] ^A - PHYSICAL SECURITY AUDIT | 9/28/12 |
| 14. | CHANGE MGT REVIEW OF DISTRIBUTION FIXED ASSETS SYSTEM | 10/17/12 |
| 15. | NET METERING REPORTING PROCESS REVIEW | 10/18/12 |
| 16. | FAS 161 CONSULTATION | 10/23/12 |
| 17. | [REDACTED] ^A TRANSACTIONS AUDIT | 10/29/12 |
| 18. | CUSTOMER NON-PUBLIC INFORMATION (NPI) DATABASE REVIEW | 11/5/12 |

Source: Req 1#2

PSC REQUEST NO. 1 (CONT...)
PAGE TWO OF FOUR

| | | |
|----------------------|--|-----------|
| 19. | RISK IDENTIFICATION AT [REDACTED] ^A | 11/14/12 |
| 20. | FT. LAUDERDALE PLANT BUSINESS PROCESS FOLLOW-UP REVIEW | 11/16/12 |
| 21. | REVIEW OF FRCC BILLING FOR RC AGENT FUNCTIONS | 11/28/12 |
| 22. | REVIEW OF SaaS SECURITY PRACTICES | 12/5/12 |
| 23. | CORPORATE CHANGE MANAGEMENT CONSULTATION | 12/10/12 |
| 24. | CORPORATE FIREWALL MGMT PROGRAM REVIEW | 12/10/12 |
| 25. | REVIEW OF VEHICLE RENTAL EXPENSE REPORTING PROCESS | 12/11/12 |
| 26. | BROWARD TRANSMISSION SERVICE CENTER ADMIN REVIEW | 12/12/12 |
| 27. | AMI [REDACTED] ^A REVIEW | 12/13/12 |
| 28. | IM VULNERABILITY IDENTIFICATION PROCESS | 12/13/12 |
| 29. | REVIEW OF EAMS KEY CIP AUTOMATED CONTROLS | 12/14/12 |
| 30. | DISTRIBUTION JOB ORDER CLOSING PROCESS REVIEW | 12/14/12 |
| 31. | REVIEW COMPLIANCE WITH NEW COMPANY-OWNED VEHICLE PROCESS | 12/14/12 |
| 32. | [REDACTED] ^A [REDACTED] ^B | 12/20/12 |
| 33. | T&E DATA ANALYTICS SUMMARY | 12/31/12 |
| 34. | DIRECT ASSISTANCE DELOITTE | 12/31/12 |
| 9-1 p1 35. ✓ | SARBANES-OXLEY - ACCOUNTING - EMT | 2/11/2013 |
| 9-1 p2 part of 35 | 36. ✓ SARBANES-OXLEY - 07.08.00 ACCOUNTING FOR DERIVATIVES AND HEDGE INSTRUMENTS - EMT | 2/11/2013 |
| out of 35 | 37. ✓ SARBANES-OXLEY 08.43.00 EMT CAPACITY AND MINIMUM PAYMENTS - FPL | 2/11/2013 |

| | | | |
|------------|-------|--|-----------|
| part of 40 | 38. | SARBANES-OXLEY 07.06.01 VALUATION OF DERIVATIVES INSTRUMENTS - EMT | 2/11/2013 |
| part of 40 | 39. | SARBANES-OXLEY 07.05.01 COUNTERPARTY CREDIT - EMT | 2/11/2013 |
| 9-1 p3 | 40. ✓ | SARBANES-OXLEY - RISK MANAGEMENT - EMT | 2/11/2013 |
| part of 35 | 41. | SARBANES-OXLEY - 07.07.00 S&B EMT (FIN, INSTRUM, GAS OIL, POWER) | 2/11/2013 |
| part of 40 | 42. | SARBANES-OXLEY 07.03.01 DEAL CAPTURE & VALIDATION - EMT | 2/11/2013 |
| | 43. | REVIEW OF PPC PAYMENT RECEIVING PROCESS | 2/28/2013 |
| 9-1 p6 | 44. ✓ | EMT DAILY FERC GAS PRICE REPORTING AUDIT | 3/1/2013 |
| | 45. | [REDACTED] ^A | 3/20/2013 |
| | 46. | NEER [REDACTED] ^A AUDIT | 3/21/2013 |
| | 47. | [REDACTED] ^A | 3/22/2013 |
| | 48. | [REDACTED] ^A | 3/26/2013 |
| | 49. | REVIEW OF THE SAP CONFIGURATION OF ACCOUNTS PAYABLE AUTOMATED CONTROLS | 3/28/2013 |
| | 50. | FINANCIAL PERFORMANCE MATRIX REVIEW FOR YEAR ENDING DECEMBER 31, 2012 | 3/28/2013 |
| | 51. | [REDACTED] ^A [REDACTED] ^B | 3/29/2013 |
| | 52. | [REDACTED] ^A SECURITY REVIEW | 4/12/2013 |
| | 53. | BUSINESS CONTINUITY PLAN TEMPLATE CONSULTATION | 4/12/2013 |
| | 54. | [REDACTED] ^A | 4/24/2013 |
| | 55. | IM DISASTER RECOVERY PLAN REVIEW | 5/6/2013 |
| | 56. | REVIEW OF [REDACTED] ^A | 5/8/2013 |

| | | |
|-----|--|---------|
| 57. | TRANSMISSION PROJECT CONTRACT ADMINISTRATION | 5/16/13 |
| 58. | IM - SECURITY POLICY [REDACTED] ^A -CONSULTATION | 5/17/13 |
| 59. | NEW NUCLEAR REVIEW: 2012 EXPENDITURES | 5/31/13 |
| 60. | EXTENDED POWER UPRATE REVIEW: 2012 EXPENDITURES | 5/31/13 |
| 61. | WEST COUNTY PLANT BUSINESS PROCESS REVIEW | 6/5/13 |
| 62. | [REDACTED] ^A | 6/10/13 |
| 63. | DISTRIBUTION DISASTER RECOVERY PROCESS | 6/13/13 |
| 64. | REVIEW OF FPL STORM - [REDACTED] ^A | 6/13/13 |
| 65. | [REDACTED] ^A VMS IMPLEMENTATION | 6/13/13 |
| 66. | REVIEW [REDACTED] ^A OPERATING SYSTEM SECURITY | 6/18/13 |
| 67. | REVIEW OF PPC PAYMENT RECEIVING PROCESS FOLLOW-UP | 6/16/13 |
| 68. | DISTRIBUTION HARDENING PROGRAM CONTRACT ADMIN AUDIT | 6/24/13 |
| 69. | [REDACTED] ^A | 6/27/13 |
| 70. | NUCLEAR FIXED ASSET LIFE CYCLE REVIEW | 6/28/13 |

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 9-1

[Pages 1 through 7]

Internal Audit Notes

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 43-1/1-1/1-2/1

[Pages 2 through 3]

Confirmation Explanation

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 48-2

[Pages 1 through 26]

Energy Trading and Risk Management Policy

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 48-3

[Pages 1 through 61]

Energy Trading and Risk Management Policy

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Hedging Audit Workpaper Number 48-4

[Pages 1 through 61]

Sarbanes Oxley Compliance

**SECOND REVISED
EXHIBIT C**

JUSTIFICATION TABLE

THIRD REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
 TITLE: List of Confidential Workpapers
 AUDIT: FPL, Hedging Audit
 AUDIT CONTROL NO: 13-102-4-1
 DOCKET NO: 20180001-EI
 DATE: October 4, 2018

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

| Workpaper No. | Description | No. of Pages | Conf Y/N | Column No./Line No. | Florida Statute 366.093 (3) Subsection | Declarant |
|----------------|-----------------------------------|--------------|----------|---|--|-----------|
| 2-1 | Filing | 10 | N | | | |
| 2-2 | Filing | 16 | N | | | |
| 9 | Internal Audit List | 4 | Y | Pg. 1, Lns. 1A, 2A, 4A, 7A, 8A, 8B, 9A, 10A, 11A, 12A, 13A, 17A Pg. 2, Lns. 19A, 27A, 32A, 32B Pg. 3, Lns. 45A, 46A, 47A, 48A, 51A, 51B, 52A, 54, 56A Pg. 4, Lns. 58A, 62A, 64A, 65A, 66A, 69A | (b) | A. Maceo |
| 9-1 | Internal Audit Notes | 7 | Y | ALL | (b) | A. Maceo |
| 43-1 | Summary of Filing | 1 | N | | | |
| 43-1/1A | August Summary | 1 | N | | | |
| 43-1/1 | Derivative Settlements Report | 10 | N | | | |
| 43-1/1-1 | Invoice | 1 | N | | | |
| 43-1/1-1/1 | Purchase Statement | 1 | N | | | |
| 43-1/1-1/1-1 | Deal Ticket | 1 | N | | | |
| 43-1/1-1/1-1/1 | Deal Ticket Explanation | 1 | N | | | |
| 43-1/1-1/1-2 | Confirmation | 3 | N | | | |
| 43-1/1-1/1-2/1 | Confirmation Explanation | 3 | N Y | Pg. 1 Pg. 2-3, ALL | (d) | G. Yupp |
| 43-1/1-1/1-3 | Settlement Price Maintenance Form | 1 | N | | | |
| 43-1/1-1/1-3/1 | Gas Daily | 1 | N | | | |
| 43-1/1-2 | Invoice | 2 | N | | | |
| 43-1/1-2/1 | Purchase Statement | 2 | N | | | |
| 43-1/1-2/1-1 | Deal Ticket | 1 | N | | | |
| 43-1/1-2/1-2 | Confirmation | 3 | N | | | |
| 43-1/1-3 | Invoice | 2 | N | | | |
| 43-1/1-3/1 | Purchase Statement | 2 | N | | | |
| 43-1/1-3/1-1 | Deal Ticket | 1 | N | | | |
| 43-1/1-3/1-2 | Confirmation | 3 | N | | | |
| 43-1/1-4 | Gas Closing Report | 1 | N | | | |

| Workpaper No. | Description | No. of Pages | Conf Y/N | Column No./Line No. | Florida Statute 366.093 (3) Subsection | Declarant |
|----------------|-----------------------------------|--------------|----------|---------------------|--|-----------|
| 43-1/1-4/1 | Gas Closing Report | 2 | N | | | |
| 43-1/1-4/1-1 | Gas Sales Summary | 1 | N | | | |
| 43-1/1-4/2 | Consumption Reporting | 2 | N | | | |
| 43-1/1-5 | Derivative JE | 1 | N | | | |
| 43-1/1-5/1 | Derivative Asset Account | 1 | N | | | |
| 43-1/1-5/1-1 | Derivative Balance | 1 | N | | | |
| 43-1/2A | June Summary | 1 | N | | | |
| 43-1/2 | Derivative Settlements Report | 10 | N | | | |
| 43-1/2-1 | Invoice | 2 | N | | | |
| 43-1/2-1/1 | Payment Coupon | 1 | N | | | |
| 43-1/2-1/2 | Invoice | 2 | N | | | |
| 43-1/2-1/2-1 | Deal Ticket | 1 | N | | | |
| 43-1/2-1/2-2 | Confirmation | 2 | N | | | |
| 43-1/2-1/2-3 | Settlement Price Maintenance Form | 1 | N | | | |
| 43-1/2-1/2-3/1 | Gas Daily | 1 | N | | | |
| 43-1/2-2 | Invoice | 2 | N | | | |
| 43-1/2-2/1 | Payment Coupon | 1 | N | | | |
| 43-1/2-2/1-1 | Settlement Statement | 1 | N | | | |
| 43-1/2-2/1-2 | Deal Ticket | 1 | N | | | |
| 43-1/2-2/1-3 | Confirmation | 2 | N | | | |
| 43-1/2-3 | Invoice | 2 | N | | | |
| 43-1/2-3/1 | Payment Coupon | 1 | N | | | |
| 43-1/2-3/1-1 | Settlement Statement | 2 | N | | | |
| 43-1/2-3/2 | Deal Ticket | 1 | N | | | |
| 43-1/2-3/3 | Confirmation | 2 | N | | | |
| 43-1/3 | Brokerage Fees | 1 | N | | | |
| 43-1/3-1 | Invoice | 2 | N | | | |
| 43-1/3-2 | Brokerage Fees | 1 | N | | | |
| 43-2 | Filing Summary | 2 | N | | | |
| 43-2/1A | August Summary | 1 | N | | | |
| 43-2/1 | Derivative Settlements Report | 4 | N | | | |
| 43-2/2A | August Invoices | 1 | N | | | |
| 43-2/2 | Invoice | 2 | N | | | |
| 43-2/2-1 | Purchase Statement | 2 | N | | | |
| 43-2/2-2 | Deal Ticket | 6 | N | | | |
| 43-2/2-3 | Confirmation | 2 | N | | | |
| 43-2/2-3/1 | Confirmation | 2 | N | | | |
| 43-2/2-4 | Settlement Pricing | 1 | N | | | |
| 43-2/2-4/1 | Platts | 23 | N | | | |
| 43-2/3 | Payment Coupon | 1 | N | | | |
| 43-2/3-1 | Invoice | 2 | N | | | |
| 43-2/3-1/1 | Statement | 1 | N | | | |
| 43-2/3-2 | Deal Ticket | 5 | N | | | |
| 43-2/3-3 | Confirmation | 2 | N | | | |
| 43-2/4 | Payment Coupon | 1 | N | | | |
| 43-2/4-1 | Invoice | 2 | N | | | |
| 43-2/4-1/1 | Statement | 2 | N | | | |
| 43-2/4-2 | Deal Ticket | 4 | N | | | |
| 43-2/4-3 | Confirmation | 2 | N | | | |

| Workpaper No. | Description | No. of Pages | Conf Y/N | Column No./Line No. | Florida Statute 366.093 (3) Subsection | Declarant |
|----------------|---|--------------|----------|---------------------|--|-----------|
| 43-2/5 | Allocation of Oil Financial Instruments | 1 | N | | | |
| 43-2/5-1 | Journal Entry | 1 | N | | | |
| 43-2/6 | Allocation of Oil Financial Instruments | 1 | N | | | |
| 43-2/6-1 | Journal Entry | 1 | N | | | |
| 43-2/6-2 | Derivative Settlements Report | 2 | N | | | |
| 43-2/8 | Derivative Settlements Report | 2 | N | | | |
| 43-2/8-1 | Derivative Settlements Report | 2 | N | | | |
| 43-2/8-2 | Invoice | 1 | N | | | |
| 43-2/8-2/1 | Purchase Statement | 1 | N | | | |
| 43-2/8-2/1-1 | Deal ticket | 1 | N | | | |
| 43-2/8-2/1-2 | Confirmation | 2 | N | | | |
| 43-2/8-2/1-3 | Confirmation | 4 | N | | | |
| 43-2/8-2/1-4 | Average Pricing | 1 | N | | | |
| 43-2/8-2/1-4/1 | Publication Prices | 3 | N | | | |
| 43-2/8-2/1-4/2 | Platts | 1 | N | | | |
| 43-3 | Statement | 1 | N | | | |
| 43-4 | Statement | 1 | N | | | |
| 43-4/1 | Hedging Strategy | 1 | N | | | |
| 43-4/2 | Hedging Strategy | 1 | N | | | |
| 43-6 | Futures Contract Rate | 1 | N | | | |
| 43-6/1 | Summary of Henry Hub | 2 | N | | | |
| 43-6/1-1 | Publication | 1 | N | | | |
| 43-6/1-2 | Publication | 1 | N | | | |
| 43-7 | Settlement Status | 1 | N | | | |
| 45 | Rebalancing | 1 | N | | | |
| 45-1 | Rebalancing | 1 | N | | | |
| 45-1/1 | PPS | 3 | N | | | |
| 45-1/2 | PPS | 3 | N | | | |
| 45-1/3 | PPS | 3 | N | | | |
| 45-2 | Rebalancing | 1 | N | | | |
| 45-2/1 | Burn Forecast | 5 | N | | | |
| 45-2/2 | Oil Hedge | 1 | N | | | |
| 45-2/2-1 | Deal Tickets | 4 | N | | | |
| 45-2/2-1/1 | Publication | 1 | N | | | |
| 45-2/3 | Gas Hedge | 3 | N | | | |
| 45-2/3-1 | Deal Tickets | 3 | N | | | |
| 45-2/3-1/1 | NYMEX Henry Hub futures | 1 | N | | | |
| 48-1 | 2013 Risk Management Plan | 7 | N | | | |
| 48-2 | Energy Trading and Risk Management Policy | 26 | Y | ALL | (e) | G. Yupp |
| 48-3 | Trading and Risk Management Manual | 61 | Y | ALL | (e) | G. Yupp |

| Workpaper No. | Description | No. of Pages | Conf Y/N | Column No./Line No. | Florida Statute 366.093 (3) Subsection | Declarant |
|---------------|-------------------------------|--------------|----------|---------------------|--|-----------|
| 48-4 | Sarbanes Oxley Compliance | 61 | Y | ALL | (e) | G. Yupp |
| 48-5 | Affiliate Transactions | 1 | N | | | |

**THIRD REVISED
EXHIBIT D**

DECLARATIONS

THIRD 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: 20180001-EI

DECLARATION OF GERARD J. YUPP

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

2. I have reviewed the documents referenced and incorporated in FPL's Third Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 13-102-4-1. 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. The documents contain or constitute contractual information, which allow FPL to execute fuel purchases on favorable terms for FPL and its customers. The disclosure of this information would impair FPL's ability to negotiate, to the detriment of FPL and its customers. 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-17-0120-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 36 months or until retention of this information by the Commission is no longer necessary. 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: 9/25/18

THIRD 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: 20180001-EI

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 declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Third Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 13-102-4-1 for which I am designated as the declarant. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, contain or constitute internal auditing controls, reports or notes of internal auditors, or information relating to internal auditing reports issued in 2012. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing scope, process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may affect the effectiveness of the Internal Auditing department itself. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-17-0120-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of 36 months or until retention of this information by the Commission is no longer necessary. 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: 9/24/18