Ohio | Public Utilities Commission

DIS Case Number: 08-1081-EL-CRS

Section A: Application Information

A-1. Provider type:

☐ Power Broker ☐ Aggregator ☐ Retail Generation Provider ☒ Power Marketer

A-2. Applicant's legal name and contact information.

Legal Name: NextEra Energy Services Ohio LLC
Phone: 7134015542 **Extension (if applicable):**
Website (if any): nexteraenergyservices.com

Country: United States
Street: 20455 State Highway 249 Suite 200
City: Houston **Province/State:**
Postal Code: 77070

A-3. Names and contact information under which the applicant will do business in Ohio

Provide the names and contact information the business entity will use for business in Ohio. This does not have to be an Ohio address and may be the same contact information given in A-2.

Name	Type	Address	Active?	Proof
NextEra Energy Services Ohio, LLC	Official Name	20455 State Highway 249, Suite 200 Houston, TX 77070	Yes	File

A-4. Names under which the applicant does business in North America

Provide all business names the applicant uses in North America, including the names provided in A-2 and A-3.

Name	Type	Address	Active?	Proof
NextEra Energy Services Ohio, LLC	Official Name	20455 State Highway 249, Suite 200 Houston, TX 77070	Yes	File

A-5. Contact person for regulatory matters

Ohio | Public Utilities Commission

Dana Coulter
20455 State Highway 249, Suite 200
Houston, TX 77070
US
dana.coulter@nee.com

A-6. Contact person for PUCO Staff use in investigating consumer complaints

George Jefferson
20455 State Hwy 249
Houston, TX 77070
US
puccomplaints@nexteraenergyservices.com
7134015608

A-7. Applicant's address and toll-free number for customer service and complaints

Phone: 800.882.1276	**Extension (if applicable):**	**Country:** United States	
Fax:	**Extension (if applicable):**	**Street:** 20455 State Highway 249, Suite 200	
Email: custserv@nexteraenergyservices.com		**City:** Houston	**Province/State:** TX
		Postal Code: 77070	

A-8. Applicant's federal employer identification number

26-3266283

A-9. Applicant's form of ownership

Form of ownership: Limited Liability Company (LLC)

A-10. Identify current or proposed service areas

Identify each service area in which the applicant is currently providing service or intends to provide service and identify each customer class that the applicant is currently serving or intends to serve.

Service area selection

Duke Energy Ohio
FirstEnergy - Cleveland Electric Illuminating

FirstEnergy - Ohio Edison
FirstEnergy - Toledo Edison
AES Ohio
American Electric Power (AEP)

Class of customer selection

Commercial
Industrial
Mercantile
Residential

A-11. Start date

Indicate the approximate start date the applicant began/will begin offering services: 10-16-2022

A-12. Principal officers, directors, and partners

Please provide all contacts that should be listed as an officer, director or partner.

Name	**Email**	Title	Address
George Jefferson	puccomplaints@nexteraenergyservices.com		20455 State Hwy 249 Houston, TX 77070 US
Dana Coulter	dana.coulter@nee.com	Principal Regulatory Affairs Analyst	20455 State Hwy 249, Ste 200 Houston, TX 77070 US
CONSUMER COMPLAINT-NextEra Energy Services Ohio LLC	puccomplaints@nexteraenergyservices.com		20455 State Highway 249 Suite 200 Houston, TX 77070 US
Brian Landrum	regulatory@nexteraenergyservices.com	President	20455 State Highway 249, Suite 200 Houston, TX 77070 US
Paula Williams	paula.williams@gexaenergy.com	Principal Regulatory Affairs Analyst	20455 State Highway 249 Suite 200 Houston, TX 77070 US

A-13. Company history

NextEra Energy Services Ohio, LLC ('NextEra Energy Services') and its affiliates engage in the competitive retail sale of electric and gas throughout the United States, as further set forth in Exhibits B-1, B-2, D-1 and D-2.

NextEra Energy Services is an affiliate of NextEra Energy Inc., which, through its affiliates and subsidiaries, provides wholesale electric services throughout the United States and Canada. NextEra Energy Services has been established to engage in the retail sales of electricity and natural gas in the State of Ohio. Please refer to Exhibits B-1, B-2 and B-3 for corporate history of NextEra affiliates engaged in the retail sale of electricity, retail sale of gas and for a description of NextEra Energy, Inc.

Further information may be obtained at www.nexteraenergy.com.

A-14. Secretary of State

Secretary of State Link:

Section B: Applicant Managerial Capability and Experience

B-1. Jurisdiction of operations

List all jurisdictions in which the applicant or any affiliated interest of the applicant is certified, licensed, registered or otherwise authorized to provide retail natural gas service or retail/wholesale electric service as of the date of filing the application..

Jurisdiction of Operation: NextEra Energy Services Ohio, LLC (NextEra Energy Services) is a wholly owned indirect subsidiary of NextEra Energy, Inc. (NEE), which is one of the nation's largest providers of electricity-related services and is nationally known as a high-quality, efficient and customer-driven organization. NEE companies engage retail and wholesale electric markets, as well as retail and wholesale natural gas markets throughout the United States. Wholesale electric services are provided through NextEra Energy Marketing, LLC (NEM), a NextEra Energy, Inc. company that was created to aggregate the non-rate regulated energy-related operation of NextEra Energy, Inc. NEE owns, develops, constructs, manages and operates domestic generating facilities in wholesale energy markets in 38 states and 4 Canadian provinces. With respect to retail electric services, certain NextEra affiliates engage in the retail sale of electricity to residential, commercial and industrial customers in Texas and other jurisdictions, as described in Exhibits B-2. Please refer to Exhibit C-8 and D-2 which provide information concerning the corporate structure and operations of NextEra Energy, Inc.

B-2. Experience and plans

Describe the applicant's experience in providing the service(s) for which it is applying (e.g., number and type of customers served, utility service areas, amount of load, etc.). Include the plan for contracting with customers, providing contracted services, providing billing statements and responding to customer inquiries and complaints in accordance with Commission rules adopted pursuant to Sections 4928.10 and/or 4929.22 of the Ohio Revised Code.

File(s) attached

B-3. Disclosure of liabilities and investigations

For the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant, describe all existing, pending or past rulings, judgments, findings, contingent liabilities, revocation of authority, regulatory investigations, judicial actions, or other formal or informal notices of violations, or any other matter related to competitive services in Ohio or equivalent services in another jurisdiction..

File Attached

B-4. Disclosure of consumer protection violations

Has the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant been convicted orheld liable for fraud or for violation of any consumer protection or antitrust laws within the past five years?

No

B-5. Disclosure of certification, denial, curtailment, suspension or revocation

Has the applicant, affiliate, or a predecessor of the applicant had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, revoked, or cancelled or been terminated or suspended from any of Ohio's Natural Gas or Electric Utility's Choice programs within the past two years?

No

B-6. Environmental disclosures

Provide a detailed description of how the applicant intends to determine its generation resource mix and environmental characteristics, including air emissions and radioactive waste. Include the annual projection methodology and the proposed approach to compiling the quarterly actual environmental disclosure data. See 4901:1-21-09 of the Ohio Administrative Code for additional details of this requirement.

PJM disclosure option chosen

Section C: Applicant Financial Capability and Experience

C-1. Financial reporting

Provide a current link to the most recent Form 10-K filed with the Securities and Exchange Commission (SEC) or upload the form. If the applicant does not have a Form 10-K, submit the parent company's Form 10-K. If neither the applicant nor its parent is required to file Form 10-K, state that the applicant is not required to make such filings with the SEC and provide an explanation as to why it is not required.

Financial Reports Link(s): Please find herein as Exhibit C-1 the link to the most recent SEC Filings for NextEra Energy Services Ohio, LLC's parent affiliate, NextEra Energy Inc.

NextEra Energy, Inc. 2021 FORM 10-K:

https://www.investor.nexteraenergy.com/reports-and-filings/annual-reports

C-2. Financial statements

Provide copies of the applicant's <u>two most recent years</u> of audited financial statements, including a balance sheet, income statement, and cash flow statement. If audited financial statements are not available, provide officer certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, provide audited or officer certified financial statements covering the life of the business. If the applicant does not have a balance sheet, income statement, and cash flow statement, the applicant may provide a copy of its two most recent years of tax returns with **social security numbers and bank account numbers redacted.**

If the applicant is unable to meet the requirement for two years of financial statements, the Staff reviewer may request additional financial information.

Links to Financial Statement(s): NextEra Energy Services Ohio, LLC does not prepare stand–alone audited financial statements but is included in the audited financial statement of NextEra Energy, Inc., its ultimate parent company.

NextEra Energy Inc.'s two most recent years of audited financial statements link: https://www.investor.nexteraenergy.com/reports-and-filings/annual-reports

C-3. Forecasted financial statements

Provide two years of forecasted income statements **based solely on the applicant's anticipated business activities in the state of Ohio.**

Include the following information with the forecast: a list of assumptions used to generate the forecast; a statement indicating that the forecast is based solely on Ohio business activities only; and the name, address, email address, and telephone number of the preparer of the forecast.

The forecast may be in one of two acceptable formats: 1) an annual format that includes the current year and the two years succeeding the current year; or 2) a monthly format showing 24 consecutive months following the month of filing this application broken down into two 12-month periods with totals for revenues, expenses, and projected net incomes for both periods. Please show revenues, expenses, and net income (revenues minus total expenses) that is expected to be earned and incurred in **business activities only in the state of Ohio** for those periods.

If the applicant is filing for both an electric certificate and a natural gas certificate, please provide a separate and distinct forecast for revenues and expenses representing Ohio electric business activities in the application for the electric certificate and another forecast representing Ohio natural gas business activities in the application for the natural gas certificate.

Preferred to file confidentially

C-4. Credit rating

Provide a credit opinion disclosing the applicant's credit rating as reported by at least one of the following ratings agencies: Moody's Investors Service, Standard & Poor's Financial Services, Fitch Ratings or the National Association of Insurance Commissioners. If the applicant does not have its own credit ratings, substitute the credit ratings of a parent or an affiliate organization and submit a statement signed by a principal officer of the applicant's parent or affiliate organization that guarantees the obligations of the applicant. If an applicant or its parent does not have such a credit rating, enter 'Not Rated'.

File(s) attached

C-5. Credit report

Provide a copy of the applicant's credit report from Experian, Equifax, TransUnion, Dun and Bradstreet or a similar credit reporting organization. If the applicant is a newly formed entity with no credit report, then provide a personal credit report for the principal owner of the entity seeking certification. At a minimum, the credit report must show summary information and an overall credit score. **Bank/credit account numbers and highly sensitive identification information must be redacted.** If the applicant provides an acceptable credit rating(s) in response to C-4, then the applicant may select 'This does not apply' and provide a response in the box below stating that a credit rating(s) was provided in response to C-4.

This does not apply.

C-6. Bankruptcy information

Within the previous 24 months, have any of the following filed for reorganization, protection from creditors or any other form of bankruptcy?

- Applicant
- Parent company of the applicant
- Affiliate company that guarantees the financial obligations of the applicant
- Any owner or officer of the applicant

No

C-7. Merger information

Is the applicant currently involved in any dissolution, merger or acquisition activity, or otherwise participated in such activities within the previous 24 months?

No

C-8. Corporate structure

Provide a graphical depiction of the applicant's corporate structure. Do not provide an internal organizational chart. The graphical depiction should include all parent holding companies, subsidiaries and affiliates as well as a list of all affiliate and subsidiary companies that supply retail or wholesale electricity or natural gas to customers in North America. If the applicant is a stand-alone entity, then no graphical depiction is required, and the applicant may respond by stating that it is a stand-alone entity with no affiliate or subsidiary companies.

File(s) attached

C-9. Financial arrangements

Provide copies of the applicant's financial arrangements to satisfy collateral requirements to conduct retail electric/natural gas business activities (e.g., parental guarantees, letters of credit, contractual arrangements, etc., as described below).

Renewal applicants may provide a current statement from an Ohio local distribution utility (LDU) that shows that the applicant meets the LDU's collateral requirements. The statement or letter must be on the utility's letterhead and dated within a 30-day period of the date the applicant files its renewal application.

First-time applicants or applicants whose certificate has expired must meet the requirements of C-9 in one of the following ways:

1. The applicant itself states that it is investment grade rated by Moody's Investors Service, Standard & Poor's Financial Services, or Fitch Ratings and provides evidence of rating from the rating agencies. If you provided a credit rating in C-4, reference the credit rating in the statement.
2. The applicant's parent company is investment grade rated (by Moody's, Standard & Poor's, or Fitch) and guarantees the financial obligations of the applicant to the LDU(s). Provide a copy of the most recent credit opinion from Moody's, Standard & Poor's or Fitch.
3. The applicant's parent company is not investment grade rated by Moody's, Standard & Poor's or Fitch but has substantial financial wherewithal i**n the opinion of the Staff reviewer** to guarantee the financial obligations of the applicant to the LDU(s). The parent company's financials and a copy of the parental guarantee must be included in the application if the applicant is relying on this option.
4. The applicant can provide evidence of posting a letter of credit with the LDU(s) listed as the beneficiary, in an amount sufficient to satisfy the collateral requirements of the LDU(s).

File(s) attached

Section D: Applicant Technical Capacity

D-1. Operations

Power Marketers/Generators: Describe the operational nature of the applicant's business, specifying whether operations will include the generation of power for retail sales, the scheduling of retail power for transmission and delivery, the provision of retail ancillary services, as well as other services used to arrange for the purchase and delivery of electricity to retail customers.

Operations Description: NextEra Energy Services Ohio, LLC's (NextEra Energy Services) operations do not include generation of power for retail sales. NextEra Energy Services' power supply obligations, including all scheduling and balancing, is managed by its affiliate, NextEra Energy Marketing, Inc. (NEM), through its settlement accounts with the PJM, MISO, and NEPOOL. NEM is a member of PJM, MISO, and NEPOOL and performs the bidding and scheduling for approximately 21,900 MWs of net generating capacity owned by NextEra Energy Inc. affiliates throughout the United States. NEM serves NextEra Energy Services' supply obligations through a combination of third-party bilateral purchase transactions, supplies from NextEra Energy Inc. affiliate's portfolio of generation assets located in the Midwest and spot market purchases from PJM, MISO and NEPOOL. NextEra Energy Services utilizes a strict load hedging program, as customers are acquired, performs load analyses and forecasts to project customers' expected usage and hedging requirements. The supplies to hedge the load is purchased from third parties or supplied from NextEra Energy Inc. affiliates' generation assets located within PJM, MISO and NEPOOL. Daily balancing of the load and supply will be managed by NEM by way of purchases and sales through the PJM, MISO and NEPOOL daily and hourly markets.

D-2. Operations Expertise & Key Technical Personnel

Given the operational nature of the applicant's business, provide evidence of the applicant's experience and technical expertise in performing such operations. Include the names, titles, e-mail addresses, and background of key personnel involved in the operations of the applicant's business.
File(s) attached

D-3. FERC Power Marketer and License Number

Provide a statement disclosing the applicants FERC Power Marketer License Number (Power Marketers Only).

ER98-3511-000

Application Attachments

B-2: EXPERIENCE & PLANS”

NextEra Energy Services Ohio, LLC (“NextEra Energy Services”) has been established to engage in the retail sale of electricity in the State of Ohio.

Experience

The experience and expertise of NextEra Energy Services’ management and affiliates in the competitive retail electricity supply market is substantial. NextEra Energy Services and its’ affiliate based in Houston, Texas, has over 300 employees. Through its affiliates NextEra Energy Services serves over 1.5 million residential and commercial customers in 25 competitive markets across the United States. As a company, NextEra Energy Services has been engaged in the competitive sale of retail electricity in Texas since 2002, when the Texas market first became competitive. The following NextEra Energy Services’ affiliates engage in competitive retail electricity supply in the respective states in which each operates: Gexa Energy LP (Texas), Gexa Energy California, LLC, Frontier Utilities, LLC (Texas), Frontier Utilities Northeast, LLC (Illinois, New Jersey, Pennsylvania, Ohio), NextEra Retail of Texas, LP, NextEra Energy Services Connecticut, LLC, NextEra Energy Services Delaware, LLC, NextEra Energy Services Illinois, LLC, NextEra Energy Services Maine, LLC, NextEra Energy Services Maryland, LLC, NextEra Energy Services Massachusetts, LLC, NextEra Energy Services New Hampshire, LLC, NextEra Energy Services New Jersey, LLC, NextEra Energy Services New York, LLC, NextEra Energy Services Ohio, LLC, NextEra Energy Services Pennsylvania, LLC, NextEra Energy Services Rhode Island, LLC and NextEra Energy Services District of Columbia, LLC.

<u>Plan for Contracting and Providing Contracted Services</u>

NextEra Energy Services offers a variety of competitive and market-driven products to customers in compliance with applicable laws and PUCO rules. Contract forms clearly disclose pricing, charges and other material terms including any rights of rescission. Please refer to Exhibit D-1 for a description of the manner in which NextEra Energy Services manages and services its electricity supply obligations.

<u>Provision of Billing Statements</u>.

NextEra Energy Services Ohio, LLC and its corporate affiliates will ultimately manage its billing responsibilities through its highly experienced key personnel in Texas, which ultimately manages its billing responsibilities and related customer service for approximately 1.5 million NextEra Energy Services affiliate customer accounts in California, Connecticut, Delaware, Illinois, Maine, Massachusetts, Maryland, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Texas and Washington, D.C. NextEra Energy Services will use Energy Services Group to manage EDI transactions. Customers are generally invoiced on a consolidated basis by the applicable utility, with necessary coordination and review by NextEra Energy Services. Where required for more sophisticated products, NextEra Energy Services will manage the billing of the energy portion of the charges. Bills prepared at the direction of NextEra Energy Services are done so in accordance with all applicable rules of Ohio Public Utility Commission.

<u>Response to Customer Inquiries and Complaints</u>

As mentioned above, customer service will be ultimately managed by NextEra Energy Services' key personnel in Texas. Any customer with a question or complaint regarding billing or other generation service matters may contact a NextEra Energy Services Customer Care representative at a dedicated toll-free number or email address provided in the customer contract. NextEra Energy Services Customer Care personnel will make every effort to respond to the customer's inquiry or resolve its complaint in a timely and satisfactory fashion. In the event that a customer complaint cannot be resolved by a Customer Care service representative, the customer may request a review by a NextEra Energy Services Customer Care manager or supervisor. If a mutually agreeable resolution cannot be reached at that level, the Customer Care manager or supervisor will review the complaint and then notify the customer of the outcome. At that time, the customer will also be notified of its right to file a complaint with the PUCO and NextEra Energy Services will provide the telephone number, facsimile number and website of the PUCO for the customer's convenience.

NextEra Energy Services will exercise rigorous quality control and will ensure that its customer service representatives are well trained in applicable law and PUCO rules governing the provision of retail electric service. NextEra Energy Services also expects that it will work closely with the applicable utilities to resolve billing disputes for those customers who can only be billed for delivery service by the utilities under applicable Ohio law.

NextEra Energy Services provides training to all personnel and stresses the importance and understanding of each of the following objectives:

- Knowledge and aware NextEra Energy Services of applicable Ohio laws and regulations governing marketing and consumer protection.
- Knowledge and understanding of responsible and ethical sales practices.
- Knowledge of the Company's products and services.
- Knowledge of the Company's rates, rate structures and payment options.
- Knowledge of the customers' right to rescind and cancel contracts.
- Knowledge of the applicability of early termination fees for contract cancellation.
- Knowledge of and adherence to Company-developed scripts.

- Knowledge on the proper completion of contract and enrollment documents.
- Knowledge of relevant terms and definitions.
- Knowledge of how customers may contact the Company to obtain information about billing, disputes, and complaints

UNITED STATES OF AMERICA
STATE OF OHIO
OFFICE OF THE SECRETARY OF STATE

I, Frank LaRose, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show NEXTERA ENERGY SERVICES OHIO, LLC, a Delaware For Profit Limited Liability Company, Registration Number 1802565, filed on September 2, 2008, is currently in FULL FORCE AND EFFECT upon the records of this office.

Witness my hand and the seal of the Secretary of State at Columbus, Ohio this 7th day of June, A.D. 2021.

Ohio Secretary of State

Validation Number: 202115802584

B-3: DISCLOSURE OF LIABILITIES AND INVESTIGATIONS

Pursuant to a Notice of Violation in Docket 49930, the Public Utility Commission of Texas (PUCT) contended that Gexa Energy, LP, an affiliate of NextEra Energy Services Ohio, LLC, violated certain PUCT customer protection rules. Gexa Energy in 2019 enacted controls to prevent any future discrepancies as in the contended violations and paid an administrative penalty of $35,000.

Pursuant to a Decision 22-01-025 in Rulemaking 18-07-003, the California Public Utilities Commission (Commission) contended that Gexa Energy California, LLC, an affiliate of NextEra Energy Services Ohio, LLC, failed to comply with the Renewables Portfolio Standard reporting requirements for the Compliance Period 2014-2016 resulting in the payment of a penalty of $352,500.

C-4: CREDIT RATING

Please see attached a copy of the credit rating of NextEra Energy Inc., NextEra Energy Services Ohio, LLC ultimate parent company, as reported by Moody's. Please also refer to Exhibit C-9 providing that NextEra Energy Services Ohio, LLC intends to rely upon NextEra Energy Inc.'s affiliates for funding of its retail electricity operations in Ohio.

The required statement that guarantees the obligations of NextEra Energy Services Ohio, LLC is being provided confidentially as Exhibit C-4a.

MOODY'S
INVESTORS SERVICE

CREDIT OPINION
28 July 2022

Update

Send Your Feedback

RATINGS

NextEra Energy, Inc.

Domicile	Juno Beach, Florida, United States
Long Term Rating	Baa1
Type	LT Issuer Rating - Dom Curr
Outlook	Stable

Please see the ratings section at the end of this report for more information. The ratings and outlook shown reflect information as of the publication date.

Contacts

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jeffrey.cassella@moodys.com

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jayce.kim@moodys.com

Michael G. Haggarty +1.212.553.7172
Associate Managing Director
michael.haggarty@moodys.com

Jim Hempstead +1.212.553.4318
MD - Global Infrastructure & Cyber Risk
james.hempstead@moodys.com

NextEra Energy, Inc.

Update to credit analysis

Summary

NextEra Energy, Inc.'s (NEE) credit profile reflects its industry leading positions in the regulated utility and renewable energy sectors as well as a typically solid financial profile. Its principal utility subsidiary, Florida Power and Light Company (FPL), is the foundation of NEE's credit quality and one of the largest and financially strongest regulated electric utilities in the US. FPL accounted for roughly 70% of NEE's consolidated EBITDA and accounts for the majority of NEE's regulated business. Most of NEE's remaining EBITDA is generated by NextEra Energy Resources LLC (NEER), which holds the largest private portfolio of renewable power projects in North America. NEER is the principal subsidiary of NextEra Energy Capital Holdings, Inc. (NEECH), an intermediate holding company of NEE and the principal debt financing vehicle for NEE's businesses outside of the Florida utility. NEER also owns a majority 54.7% stake in NextEra Energy Partners, LP (NEP), a yieldco that acquires, manages and owns long-term contracted clean energy projects and gas pipelines with stable cash flow.

NEE's credit quality also considers the company's typically solid financial profile which has weakened more recently, although we expect this to be temporary. For the 12-months ended 31 March 2022, NEE's consolidated ratio of cash flow from operations pre-working capital changes (CFO pre-W/C) to debt was 15.7%; lower than historical levels in the high teens. These weaker credit metrics are mainly attributed to substantial debt issuances in 2022 to fund elevated capital investments across the family and FPL's modestly weaker financial metrics compared to historical levels. This was largely due to FPL's extending its 2016 rate settlement agreement an additional year through 2021. FPL's recent rate case settlement agreement was approved in October 2021 with new rates effective January 2022. When taking a forward view and pro forma for debt reduction using proceeds from future equity unit conversions, we estimate NEE's ratio of CFO pre-W/C to debt would be about 16.7% including the proportional consolidation of NEP's results. With the benefits of base rate revenue increases at FPL driven by the supportive outcome of its latest rate case, some debt reduction and increasing cash flow generation from NEER's project growth, we expect NEE's consolidated ratio of CFO pre-W/C to debt to again reach the 17% - 18% range over the next few years.

NEE's credit is constrained by an elevated level of holding company debt, approximately 46% of consolidated debt, which includes the proportional consolidation of NEP's debt (roughly 42% of consolidated debt when allocating some parent debt to certain unlevered operating assets). NEE's percentage of holding company debt is one of the highest among regulated utility holding company peers. NEE is also exposed to extreme weather events such as hurricanes and tropical storms that periodically affect FPL's service territory, however the

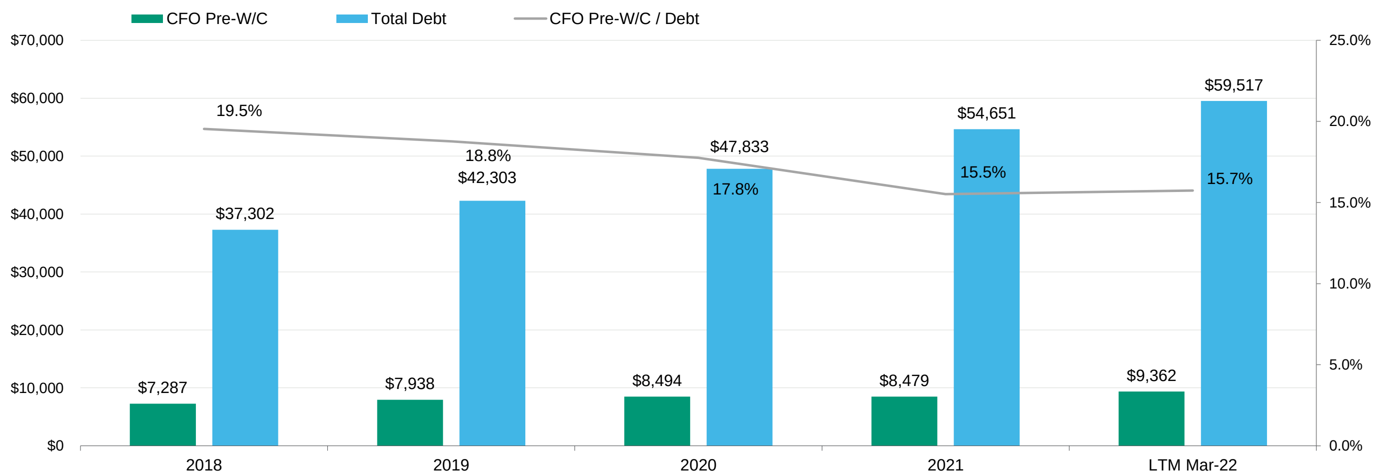
Florida regulatory and legislative environments have a history of credit supportiveness during and in the aftermath of such events.

Recent developments

On 25 January, NEE announced the retirement of James Robo as the company's Chairman, President and Chief Executive Officer and his transition to Executive Chairman effective 1 March through 29 July. John Ketchum, previously the President and Chief Executive Officer of NEER succeeded Robo as President and Chief Executive Officer of NEE and will become Executive Chairman on 29 July. Simultaneous with the CEO change, effective 1 March, previous NEE Chief Financial Officer Rebecca Kujawa succeeded Ketchum as President and Chief Executive Officer of NEER. On the same date, T. Kirk Crews, previously NEE's Vice President, Business Management, succeeded Kujawa as Chief Financial Officer of NEE. NEE indicated that the management changes were part of the company's long-term succession plan.

Exhibit 1

Historical CFO Pre-WC, Total Debt and ratio of CFO pre-W/C to Debt ($ MM)



Source: Moody's Financial Metrics

Credit strengths

» Large size and leading position in the regulated utility and renewable energy sectors

» FPL's strong credit quality is the foundation of NEE's credit profile

» Continued focus on growing regulated assets strengthens business risk profile

» NEER's higher risk profile mitigated by long-term power contracts largely with investment grade counterparties

» Financial metrics expected to improve and return to historical levels

Credit challenges

» Holding company debt percentage is one of the highest in the sector, constraining the ratings of the corporate family

» Financial metrics are currently lower than historical levels

» Large annual negative free cash flow balances continue at NEECH due to ongoing elevated investment activities that require substantial debt financing

» Geographic concentration in Florida with high risk of storm events

» Aggressive acquisition appetite for primarily regulated assets; however limited number of deals executed historically

Rating outlook

NEE's stable outlook reflects our expectation that FPL will continue to maintain a strong financial profile while operating within a highly supportive Florida regulatory environment; NEER's renewable asset portfolio will maintain its steady operating performance; major construction projects will be executed on time and within budget; and the company will continue to have strong access to the capital markets. The stable outlook considers our expectation that NEE's financial profile will strengthen such that key credit metrics will improve to levels maintained historically, including a ratio of CFO pre-W/C to debt of 17% and CFO pre-W/C less dividends to debt of roughly 10-11%. The stable outlook also incorporates our view that any M&A activity, if executed, will be financed in a manner that maintains a financial profile that supports current credit quality.

Factors that could lead to an upgrade

An upgrade of NEE is unlikely in the near future due to the high percentage of holding company debt, elevated capital project investments financed with substantial debt, single state concentration of its principal utility exposed to extreme weather events, and the company's aggressive M&A appetite. Longer term, NEE could be upgraded if there is substantial debt reduction at NEECH such that the percentage of holding company debt declines substantially as a percentage of total debt and consolidated financial metrics improve such that NEE's ratio of CFO pre-W/C to debt is sustained above 20%.

Factors that could lead to a downgrade

NEE could be downgraded if we expect its ratio of CFO pre-W/C to debt to be below 17% for an extended period. NEE could also be downgraded if the regulatory environment deteriorates in Florida, such that there delays in cost recovery; or there are adverse tax or environmental policy developments that negatively affect NEER's renewable energy business. A downgrade could occur if NEE's business risk profile deteriorates meaningfully or if its holding company level debt increases from current levels. A downgrade of FPL could lead to a downgrade of NEE, due to the importance of the utility to the parent.

Key indicators

Exhibit 2

NextEra Energy, Inc. [1]

	Dec-18	Dec-19	Dec-20	Dec-21	LTM Mar-22
CFO Pre-W/C + Interest / Interest	5.7x	4.4x	5.1x	7.1x	7.7x
CFO Pre-W/C / Debt	19.5%	18.8%	17.8%	15.5%	15.7%
CFO Pre-W/C – Dividends / Debt	13.8%	12.9%	11.9%	9.9%	10.4%
Debt / Capitalization	44.9%	45.4%	47.1%	49.9%	52.8%

[1] All ratios are based on 'Adjusted' financial data and incorporate Moody's Global Standard Adjustments for Non-Financial Corporations.
Source: Moody's Financial Metrics

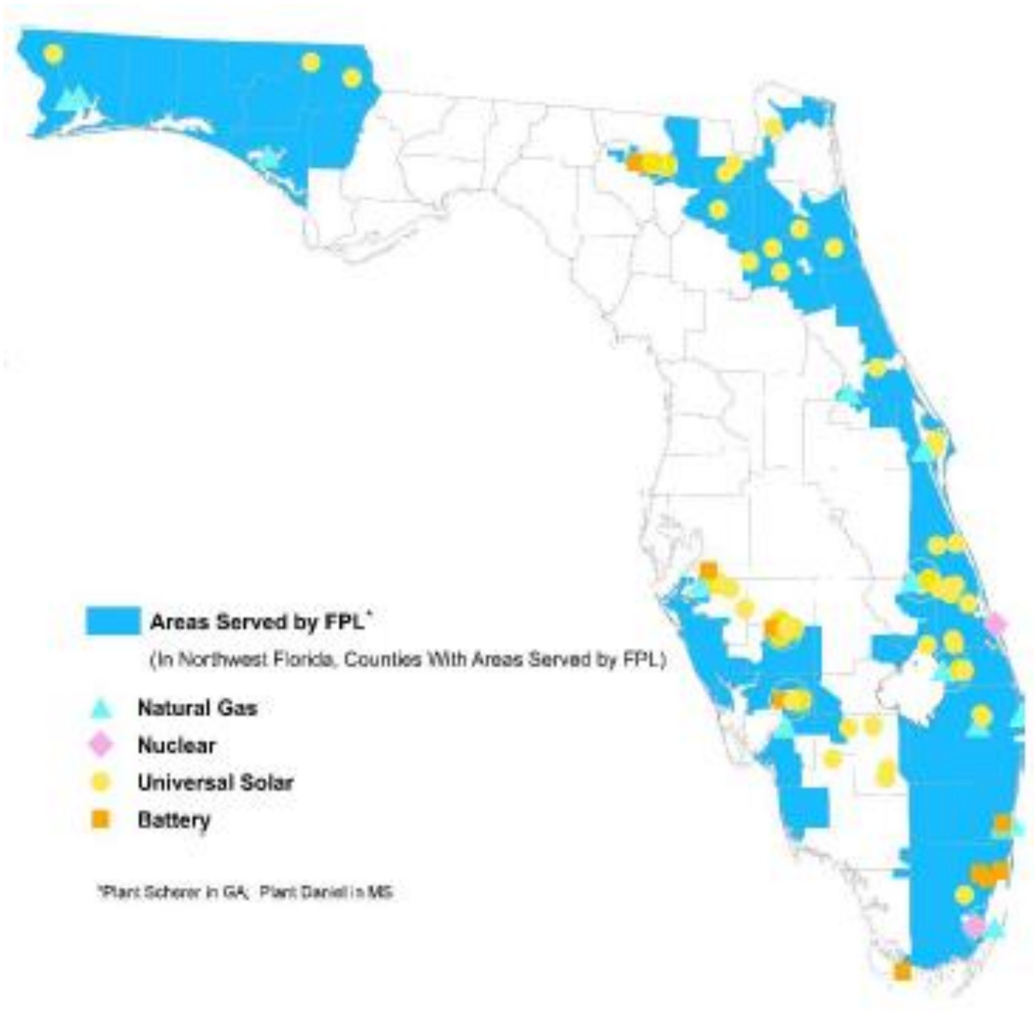
Profile

Headquartered in Juno Beach, Florida, NextEra Energy, Inc. is one of the largest holding companies in our global regulated utility rated universe. NEE's principal operating utility, Florida Power & Light Company (FPL, A1 stable) is one of the largest vertically integrated regulated utilities in the US and serves 5.7 million customer accounts or an estimated 12 million residents across more than half of the state of Florida. FPL accounts for about 70% of NEE's consolidated EBITDA.

In January 2022, FPL completed its integration of Gulf Power, one year after the two companies legally merged into FPL after the Federal Energy Regulatory Commission (FERC) approved their merger application on 15 October 2020. In addition, within the recently approved settlement agreement, rates for FPL and legacy Gulf Power became unified. FPL continues as the surviving entity as Gulf Power will conduct business as FPL in its service territory. NEE acquired Gulf Power from The Southern Company (Southern, Baa2 stable) in January 2019 for approximately $5.75 billion, which included $4.35 billion in cash plus the assumption of approximately $1.4 billion of debt.

NEE is also the holding company of NextEra Energy Capital Holdings, Inc. (NEECH, Baa1 stable), which is the principal debt financing vehicle for the businesses outside of the Florida utility and an intermediate holding company of NextEra Energy Resources (NEER, unrated). NEER is an intermediate holding company for NEE's independent power projects as well as its ownership interests in natural gas pipelines, and through a subsidiary also has majority ownership interest (currently 54.7%) in the yieldco, NextEra Energy Partners, LP (NEP, Ba1 stable). NEER's other subsidiaries include NextEra Energy Transmission (NEET, unrated), which holds FERC regulated electric transmission assets. NEE has no debt of its own but provides an unconditional guarantee of debt that resides at NEECH.

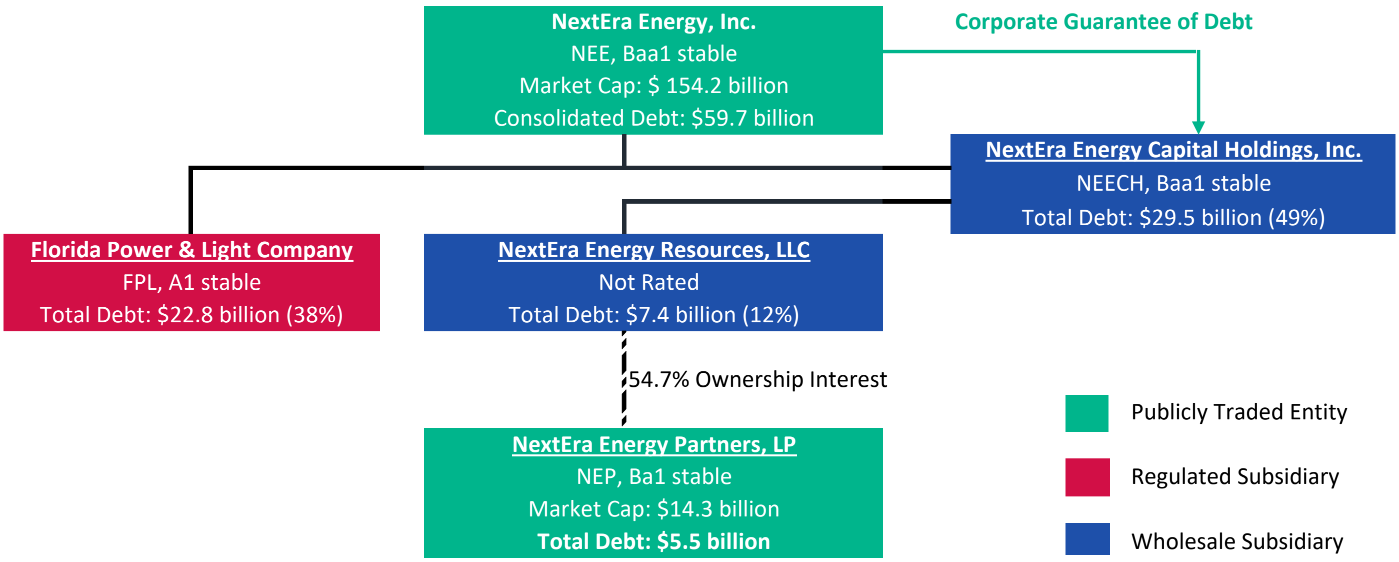
Exhibit 3
Map of NEE's regulated utility service area



Source: Company presentations

Detailed credit considerations

Exhibit 4
Organizational Chart
Debt amounts as reported



Note: As of 31 March 2022; NEE Market Capitalization as of 8 June 2022; Gulf Power was legally merged into FPL on 1 January 2021 and is included in the FPL entity box.
Source: Company Filings, Company Website

FPL's strong credit quality remains the foundation of NEE's credit profile

FPL is NEE's principal subsidiary and "crown jewel" as it is one of the financially strongest regulated electric utilities in the US, forming the foundation of NEE's credit quality. At the same time, FPL's geographic concentration in Florida exposes NEE to the state's economic cycles, weather events such as severe storms, and any significant changes to the political and regulatory environment. A rarity amongst US regulated electric utilities, FPL's growing population within its service territory generates organic sales and load growth, as well as new investment opportunities that provide steady rate base expansion with earnings and cash flow growth potential.

On 26 October 2021, the Florida Public Service Commission (FPSC) unanimously approved FPL's multiyear rate settlement agreement, based on a forward test year, approving an up to $1.5 billion base rate revenue increase over the four-year period 2022-25. The increase was premised on an allowed return on equity (ROE) of 10.6%, up from 10.55% previously, and the continuation of an equity ratio that FPL has consistently maintained at about 60%. The allowed ROE range is 9.7%-11.7%, which allows FPL to effectively earn up to an 11.7% return. The company has been able to achieve earned ROE's towards the upper end of its authorized ROE range through strong customer and sales growth as well as continued improvements in operating efficiency. The settlement included several key intervening parties consisting of the state's consumer advocacy group, the Florida Office of Public Counsel, the Florida Retail Federation, the Florida Industrial Power Users Group and the Southern Alliance for Clean Energy.

The multiyear base revenue increase included a $692 million increase on 1 January 2022 and a $560 million increase on 1 January 2023. FPL is also eligible to receive base rate increases for the addition of up to 894 megawatts annually of new solar generation through a solar base rate adjustment mechanism in each of 2024 and 2025, up to $140 million each year. The multistep nature of the rate increase mitigates some of the immediate rate effect on customers. The authorized revenue increase includes the majority of FPL's initial request filed by the company on 12 March 2021 for up to approximately $2 billion based on an allowed ROE of 11.5% and maintenance of its 60% equity ratio. The revenue increase supports FPL's long-term investments to upgrade its infrastructure, including for resiliency and grid hardening, in response to increasing occurrences of climate change related extreme weather events, such as hurricanes.

The regulatory environment for investor-owned utilities in Florida remains highly credit supportive. In its last several rate proceedings, FPL has been able to achieve multiyear rate settlements which provide a high degree of rate certainty and have supported the company's credit quality. They have included timely recovery of rate base investments, including generation, and grid hardening to combat extreme weather events, while also addressing the impacts of the 2017 federal tax reform and storm restoration costs, as needed, historically.

FPL earns the vast majority of its net income through its base rates but the 2021 rate settlement retained several cost recovery mechanisms that provide for adequate and timely cost recovery and returns on certain other investments. The company has experienced few disallowances and little regulatory lag in cost recovery. For example, its fuel and capacity clauses are adjusted annually based on expected fuel and purchased power prices and for prior period differences between projected and actual costs. FPL may also recover pre-construction costs and carrying charges for construction work-in-progress for capital expenditures. Additionally, FPL has an environmental cost recovery clause that is adjusted annually for capital spending and operating expenses related to emission controls.

The settlement agreement continued to include the utility's storm cost recovery provisions, which are important in Florida where hurricanes are prevalent. A SoBRA mechanism was also retained, which provides FPL the ability to increase base rates on a timely basis without a rate case for the addition of new solar generation assets. The revenue rate adjustment mechanism is similar to the Generation Base Rate Adjustment that allows for timely recovery of generation rate base investments like FPL's approximately $900 million Dania Beach power generation facility modernization project that commenced commercial operation in June 2022.

Support from Florida's regulatory framework during severe storms is important to credit quality

Since utilities in Florida are vulnerable to storm and hurricane activity, the regulatory framework to address costs related to extreme weather events has been an important factor supporting FPL's credit quality during storm affected years. The company can and has petitioned for recovery of storm damage costs in excess of its storm reserve that is collected through a storm surcharge. Securitization legislation for the recovery of storm-related costs is also in place in Florida, if necessary.

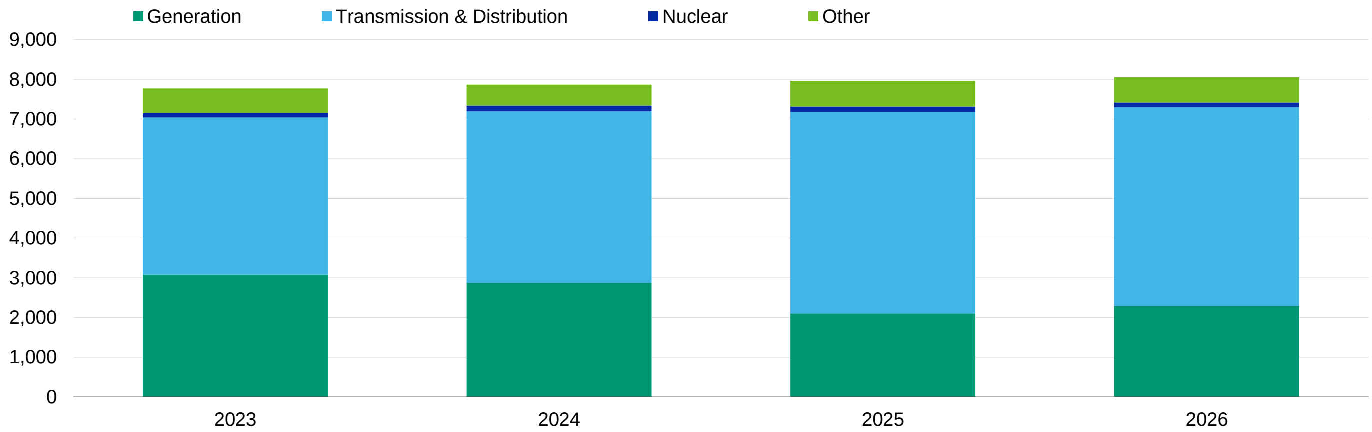
In late June 2019, the governor of Florida signed into law Senate Bill 796, which required investor-owned utilities (IOUs) to submit storm protection plans to the FPSC that detail how the IOUs will harden their grids and make them more resilient during extreme weather events like hurricanes. The law was credit positive for the state's utilities because it allows them to grow rate base through increased investments and obtain timely recovery, all in an effort to maintain customer reliability.

Following the legislation, in October 2019, the FPSC implemented a Storm Protection Plan (SPP) Cost Recovery Clause. The mechanism allows for the recovery of new transmission and distribution storm hardening investments not already included in base rates. This demonstrated that Florida regulators support proactive management of physical risks arising from climate change, which is expected to cause storms to be more frequent and powerful over the long term.

In August 2020, the FPSC approved FPL's storm protection plan, consisting of investments of about $10.2 billion to upgrade its grid infrastructure from 2020-2029, including about $5.1 billion for undergrounding power lines. FPL is spending approximately $3-4 billion in transmission and distribution storm hardening investments from 2020 - 2022 and obtaining timely recovery through the SPP recovery mechanism.

FPL expects to invest approximately $31.7 billion of new capital from 2023 - 2026. More than half of the $7-$8 billion spent annually over the next few years will be used towards continuing to update its transmission and distribution network including grid hardening and reliability investments. About 15% of the projected spending is earmarked for modernizing its existing generation portfolio by increasing its cleaner, more fuel-efficient power generation. Approximately 17% of the investments will go towards new generation capacity which will mainly be solar power.

Exhibit 5
FPL's elevated capital expenditures continue to grow rate base and cash flow ($ Millions)



Source: Company Filings

Holding company leverage remains elevated and constrains the credit profile of the entire corporate family

We estimate that NEE's holdco debt as a percentage of consolidated debt is currently about 46%, including the proportional consolidation of its ownership in NEP. When allocating some parent debt to certain unlevered nuclear generation assets, NEE's holdco debt percentage would be roughly 43% of consolidated debt. NEE's percentage of holding company debt is one of the highest within the regulated utility sector, and is a constraint on the credit quality of the entire corporate family. This holding company debt includes $6 billion of debentures related to equity units issued in 2019 and 2020. These securities trigger the mandatory issuance of new equity in three years from the time of issuance. As has been the case historically, we expect NEE to use the proceeds from the new equity to pay down holding company debt. When taking a forward view on the conversion of these equity units and assuming the company pays off debt with the proceeds as it has done historically with previous equity units, NEE's holdco debt would fall to approximately 36% of consolidated debt. We expect NEE's percentage of holding company debt to modestly and gradually decline over time.

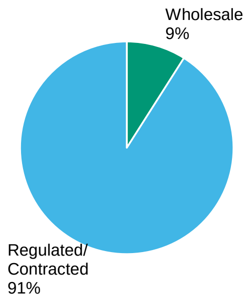
Since the Gulf Power acquisition in 2019, NEE has continued to pursue utility acquisitions but has not made any material acquisitions since that time. NEE was one of 9 bidders for the Jacksonville Electric Authority (JEA, Aa2 stable), which has since terminated the bidding process for the sale of its electric and water/wastewater assets. In addition, NEE was one of a select list of bidders for the South Carolina Public Service Authority (Santee Cooper, A2 stable), which is no longer for sale. NEE withdrew its bid and the pursuit of Santee Cooper in early 2021 prior to the company ending its sale process. Since then, NEE has executed relatively small acquisitions of FERC regulated transmission assets including Trans Bay Cable LLC in 2019 and GridLiance Holdco (unrated) in 2020.

NEER has a higher risk profile than FPL, although mitigated by long term contracts, and maintains strong growth potential

NEER, which accounts for roughly 30% of NEE's EBITDA, continues to increase the contracted portion, currently about 70%, of its large portfolio of renewable assets and expects to remain steady going forward. At the same time, NEE's regulated and contracted assets combined to account for about 92% of adjusted EBITDA in 2021.

Exhibit 6

NextEra's 2021 business mix based on adjusted EBITDA

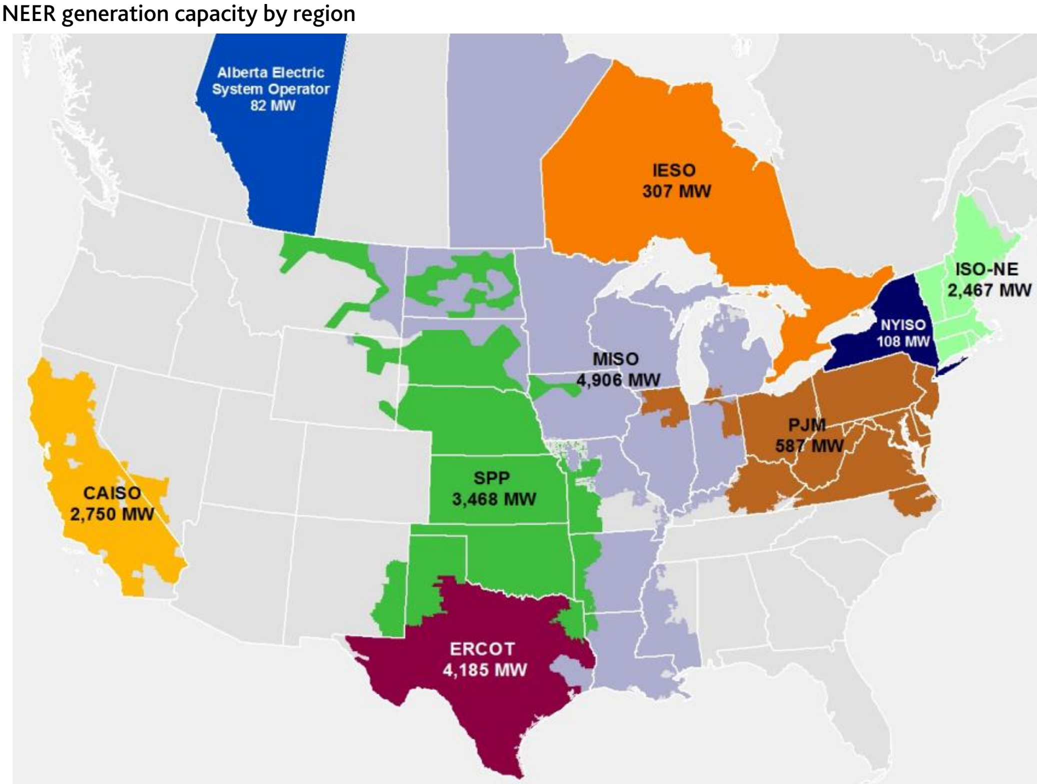


Regulated assets include FPL, FERC regulated transmission assets and pipelines.
Source: Company Presentations

NEER has a large, diverse portfolio of generation assets, and is the largest owner of wind and solar generation in North America. Strong demand for renewable energy provides NEER with growth opportunities to sell renewable power under long-term contracts, primarily to investment grade counterparties that are attracted to the generally low cost of renewable power, seeking to satisfy environmental mandates, make progress on carbon transition or meet customer preferences. Additionally, as the US, like other countries globally, continues to progress towards carbon free generation, renewable energy will continue to be in high demand. The long term revenue visibility from contracted, predominantly renewable assets, which entail no fuel risk or commodity price exposure, is in contrast to the typically higher risk associated with unregulated power companies that are exposed to wholesale merchant power sales as well as challenged coal and nuclear plants. Although NEER continues to invest heavily in development and project execution risk remains, NEER has a strong track record of completing projects on time and within budget.

Exhibit 7

NEER generation capacity by region



Source: Company filings

Although many utilities have met or are close to meeting their near-term renewable portfolio standards, utilities continue to increase their carbon reduction goals longer term. At the same time, NEER continues its efforts to contract with large high creditworthy corporations, further diversifying its customer base.

Earlier this year, NEE estimated that 2.1-2.8 GW of solar and storage projects the company planned to build in 2022 could be delayed to 2023 because a number of suppliers were not shipping solar panels to the US, pending a decision by the US Department of Commerce on solar panel tariffs. However, on 6 June, the Biden administration announced a 24-month tariff exemption for solar panel parts manufactured in four Southeast Asian countries that were the target of an anti-circumvention investigation into the importation of solar panels. The tariff exemption should give NEE greater visibility over the cost and completion of projects over the next two years, which may alleviate some or all of the expected delays. It is our understanding that none of NEE's solar panels have been subject to tariffs and all have been released from holding for shipment. The tariff exemption was in response to a Commerce Department investigation announced in March.

In late December 2020, the federal government passed a second stimulus package in response to the coronavirus pandemic. Among other things, the legislation extended tax credits related to solar and wind investment projects. The production tax credit (PTC) and investment tax credit (ITC) for onshore wind was extended one year to 2021 at 60% of the project's full value and the solar ITC at 26% was extended two years through 2025. The extension of tax credits, continuous technological improvements and reduced costs, as well as overall strong renewable demand, should continue to be positive for NEER's future business growth.

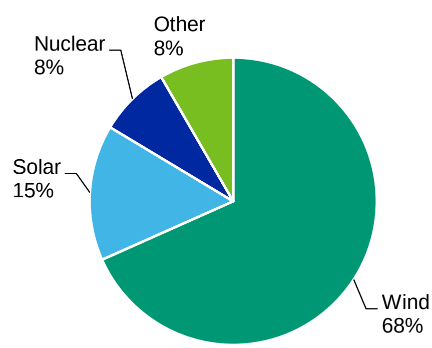
NEER's cash flow continues to increase as new generation capacity is constructed and long-term contracts are added. NEER generally manages the construction of renewable projects to make the most of the federal tax credits available. The company's capital expenditures remain elevated due to continued high demand for renewables. As such, NEER has grown its renewable capacity from approximately 16 GW in 2016 to approximately 25 GW in 2021.

Exhibit 8
NEER's development program remains elevated with over 21,000 MW in its backlog of signed contracts (MW)

	2019-2020 in Service	2021-2022 Signed Contracts [1]	2021-2022 Expectations	2023-2024 Signed Contracts	2023-2024 Expectations	2021-2024 Expectations
Wind	3,805	5,326	3,700 - 4,400	2,583	2,250 - 3,500	5,950 - 7,900
Solar	1,466	3,927	4,800 - 5,600	6,296	7,000 - 8,800	11,800 - 14,400
Energy Storage	20	1,655	1,650 - 2,000	2,099	2,700 - 4,300	4,350 - 6,300
Wind Repowering	2,611	648	375 - 700	-	200 - 700	575 - 1,400
Total	7,902	11,556	10,525 - 12,700	10,978	12,150 - 17,300	22,675 - 30,000
Build-Own-Transfer	674	110		690		

[1] 2.1 GW to 2.8 GW of 2022 solar and storage projects may shift to 2023 due to circumvention investigation
Source: Company Presentations

Exhibit 9
NEER's 31 March 2022 generation fuel mix based on MW (Includes NEP)



As of March 31, 2022
Source: Company website

Gas pipelines and energy storage also contribute to the increase in NEER's capital investments. The company continues to make relatively modest but growing investments in energy storage, which is an emerging technology growth area in the renewable sector and continues to support further growth in wind and solar energy installations.

The $1.5 billion Sabal Trail (represents NEE's 42.5% ownership interest) and the related $500 million Florida Southeast Connection gas pipelines went into service in 2017. NEE has a 32% ownership interest in the approximately $6.2 billion Mountain Valley Pipeline (MVP), which continues to be delayed due to the pending receipt of certain state and federal permits. Similar to other gas pipeline construction projects, the MVP had experienced cost overruns and delays largely related to permitting and environmental concerns. The project is currently 94% constructed and there is a chance for additional costs to be incurred due to judicial decisions and regulatory changes. For 2021, NEE announced a $1.2 billion after-tax write down in the value of its investment in MVP due to the current legal and regulatory challenges involved with the pipeline construction, as well as the substantial delays in reaching commercial operation. On 2 February 2022, the court vacated and remanded another key permit, issued by U.S. Fish and Wildlife Service, and NEE subsequently announced an after-tax impairment charge of $607 million. As a result, NEE has completely written off its entire investment in MVP. We expect the pipeline's in-service date, if completed, to continue to be delayed as it faces ongoing challenges. MVP, if completed, and other FERC regulated pipelines in operation are expected to generate stable cash flow under long-term contracts and will help support NEE's overall credit metrics.

Financial profile expected to improve and return to historical levels

For the 12-month period ended 31 March 2022, NEE's ratio of CFO pre-W/C to debt was 15.7% which is lower than its average of 17.3% for the 3-year period ending 2021. NEE's weaker financial profile, which we expect to be temporary, is mainly attributed to substantial debt issuances in 2021 to fund elevated capital investments across the family and modestly weaker credit metrics compared to historical levels at FPL. While FPL's financial profile is still strong, the utility's financial metric deterioration was largely due to FPL extending its 2016 rate settlement an additional year through 2021.

Included in parent debt is $6 billion of debentures related to equity units issued in September 2019, February 2020 and September 2020. These securities trigger the mandatory issuance of equity three years from issuance and NEE has historically used the proceeds from the new equity to reduce a like amount of holding company debt. When taking a forward view and pro forma for debt reduction using proceeds received from future equity unit conversions, we estimate NEE's ratio of CFO pre-W/C to debt would be about 17.5%. At the same time, when including the proportional consolidation of NEP's financial results, NEE's pro forma ratio of CFO pre-W/C to debt would be about 16.7%. When factoring in the additional revenue and cash flow from FPL's recent rate case as well as increasing cash flow generation from NEER project growth, we expect NEE's consolidated ratio of CFO pre-W/C to debt to be in the 17% - 18% range over the next few years. In addition, we expect that NEE will continue to manage its balance sheet in a manner that maintains a financial profile that supports its current credit quality.

In our credit analysis of NEE, we assess the company's credit metrics on a consolidated basis, including project level debt, whether that debt is recourse or not. This consolidated approach reflects our view that project cash flows are a critical component of the company's renewable business model and, as a result, project level debt should be aligned with associated cash flows received from projects.

NEE's relatively high percentage of holding company debt, approximately 46% of consolidated debt including the proportional consolidation of NEP's debt, and its higher risk, albeit heavily contracted, unregulated business are incorporated into our credit analysis. When allocating some parent debt to certain unlevered nuclear operating assets, holding company debt is still high at about 43% of consolidated debt. These factors constrain the credit profile of the entire corporate family and this is reflected in the relatively wide, three notch differential between the ratings of NEE and its principal utility subsidiary, FPL.

ESG considerations

NEE's ESG Credit Impact Score is CIS-3 (Moderately Negative)

Exhibit 10
ESG Credit Impact Score

CIS-3
Moderately Negative

NEGATIVE IMPACT POSITIVE IMPACT

For an issuer scored CIS-3 (Moderately Negative), its ESG attributes are overall considered as having a limited impact on the current rating, with greater potential for future negative impact over time. The negative influence of the overall ESG attributes on the rating is more pronounced compared to an issuer scored CIS-2.

Source: Moody's Investors Service

NEE's ESG Credit Impact Score is moderately negative (**CIS-3**) because its ESG attributes are considered as having an overall limited impact on the current rating, with potential for future negative impact over time. NEE's credit impact score reflects highly negative environmental risk, along with moderately negative social risk and neutral-to-low governance risk.

Exhibit 11
ESG Issuer Profile Scores

ENVIRONMENTAL	SOCIAL	GOVERNANCE
E-4	S-3	G-2
Highly Negative	Moderately Negative	Neutral-to-Low

Source: Moody's Investors Service

Environmental

NEE's highly negative environmental risk (**E-4** issuer profile score) largely reflects high physical climate risks resulting from hurricanes and tropical storms in its core Florida market. NEE's carbon transition risk is neutral-to-low as it has a diverse portfolio of generation with minimal coal and growing renewable energy resources. The company's nuclear generation fleet adds risks of waste management and pollution. While NEE has not had any problems with its nuclear fleet or nuclear waste to date, it remains an inherent risk for nuclear operators in the industry. The fossil fuel generation is balanced by NEER's ownership of the largest portfolio of renewable power projects in North America.

Social

NEE's exposure to social risks is moderately negative (**S-3** issuer profile score) as the operation of nuclear generation heightens the risk of responsible production, while demographics and societal trends may increase public concern over environmental, social, or affordability issues that could lead to adverse regulatory or political intervention. NEE's social risks are somewhat offset by FPL's low customer rates that are approximately 27% below the national average, strong customer and load growth as well as the robust and independent regulatory framework in which it operates. The regulatory framework provides strong assurance that the company will be able to recover storm costs from customers, even where these can be politically controversial.

Governance

NEE's governance is broadly in line with other utilities and does not pose particular risk (**G-2** issuer profile). This is supported by neutral-to-low risk scores on financial strategy and risk management, management credibility and track record, and compliance and reporting; despite a relatively low number of independent directors and additional organizational complexity with its majority-owned affiliate, NEP.

ESG Issuer Profile Scores and Credit Impact Scores for NEE are available on Moodys.com. In order to view the latest scores, please click here to go to the landing page for NEE on MDC and view the ESG Scores section.

Additional ESG considerations

NEE is strongly positioned for carbon transition within the utility sector because of its minimal coal exposure and substantial ownership of modernized and efficient natural gas-fired generation assets. In June, NEE announced its Real Zero decarbonization plan with the goal to be completely carbon emissions-free by no later than 2045. NEE has reduce its carbon dioxide emissions rate for decades, and as of 2021 has achieved a 58% reduction, compared to a 2005 adjusted baseline.

NEE's limited coal exposure relates to Gulf Power's 25% share of Scherer Unit 3 (215 MW); and 50% ownership of the Daniel coal plant in Mississippi (500 MW), expected to be retired by January 2024. FPL previously owned approximately 75% of Unit 4 (634 MW) of the Plant Scherer coal facility in Georgia but that unit was retired in December 2021.

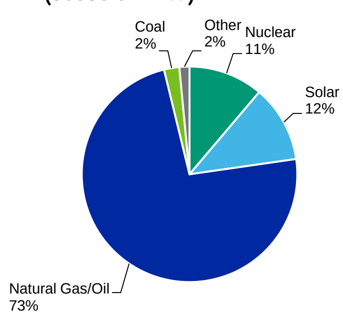
NEE, including FPL and proportional consolidation of NEP, owns approximately 24 GW of natural gas generation out of a total owned generation capacity of approximately 56 GW. NEE continues to invest in renewable energy, including at FPL where solar generation assets are typically included in rate base and in rates on a timely basis through the SoBRA cost recovery mechanism.

As part of NEE's Real Zero goal, FPL would accelerate the transformation of its generation mix, reaching 36% decarbonization by 2025; 52% by 2030; 62% by 2035; 83% by 2040; and culminating in 100% decarbonization by no later than 2045.

As of 31 March 2022, approximately 12% of FPL's (combined with Gulf Power) approximately 31,300 MW of total capacity was solar. As part of its Real Zero decarbonization plan, FPL is projecting an increase its solar capacity to over 90,000 MW by no later than 2045, which equates to adding slightly less than 4,000 MW of solar per year. In its 2021 rate case settlement, FPL is authorized to implement solar base rate adjustments with the commercial operation of up to 1,788 megawatts of solar generation projects to be constructed in 2024 and 2025, subject to a cap on installed costs of $1,250 per kilowatt.

FPL continues to grow its portfolio of solar power plants as part of the company's “30-by-30” plan to install 30 million solar panels by 2030, which the company expects to complete by 2025. In addition, in March 2020, the FPSC unanimously approved FPL's “SolarTogether” initiative, which allows customers to source up to 100% of their energy from solar and receive monthly bill credits, net of subscription fees. With the authorization to build an additional 1,788 MW, granted as part of FPL’s 2021 rate case settlement agreement, FPL's total SolarTogether capacity adds up to 3,278 MW.

Exhibit 12
FPL electricity generation by fuel mix (based on MW)



As of March 31, 2022
Source: Company website

As mentioned above, NEE's regulated utility service territories are along the coasts of Florida, making them vulnerable to storm related event risk. As such, regulatory treatment to address storm costs has and will continue to be an important factor supporting the credit quality of FPL, particularly since climate change is expected to make storms more severe and more frequent. Securitization legislation for the recovery of excessive storm-related costs is also in place in Florida, although FPL has not pursued securitization financing for storm costs in recent years. We expect FPL will have to deal with severe storm activity periodically going forward and continued favorable regulatory treatment will be important in supporting credit quality.

Liquidity analysis

NEE's corporate family of companies have sufficient liquidity, with FPL maintaining the strongest liquidity profile, primarily due to its robust cash flow generation and strong access to the capital markets. As has been the case historically, NEECH's liquidity is somewhat constrained as NEER continues a significant capital investment program, with the need to repay/refinance a substantial amount of maturing debt periodically, and the potential for material contingent calls related to its hedging and marketing activities. However, NEECH has demonstrated an ability to manage its liquidity profile effectively, primarily through strong access to bank and debt capital markets.

For the 12-months ended 31 March 2022, FPL's cash flow from operations was $5.6 billion compared to capital expenditures of $8.2 billion, which remains elevated largely driven by spending on transmission and distribution infrastructure, existing generation asset upgrades, and new solar generation investments. The shortfall in funding capital investments using internally generated cash flow was supplemented by short and long-term borrowings as well as capital contributions from its parent. Going forward, we expect FPL will largely fund its capital investments using internally generated cash flow and any shortfalls will be supplemented with debt borrowings and equity contributions from its parent in a balanced manner in order to maintain its targeted capital structure.

As of 31 March 2022, FPL had net available liquidity of about $2.8 billion, which included $4.6 billion of bank revolving line of credit facilities that also backstop its commercial paper (CP) program which had $1.8 billion of CP outstanding. The utility had full availability of its $780 million of bilateral revolving credit facilities and $52 million of cash and cash equivalents on hand. Owing to its strong credit profile, FPL maintains strong access to the capital markets which typically allows the utility to easily refinance its debt maturities. Commitments under the core revolver are laddered, with the vast majority terminating in 2027. FPL's credit facilities do not contain a material adverse change clause for new borrowings. The next largest debt maturity at FPL is $300 million of term loans maturing in September 2022 followed by $500 million of first mortgage bonds maturing in June 2023.

NEECH's liquidity profile is impacted by NEER's elevated capital investment program, particularly strong growth and development of new renewable power projects, which typically results in substantial negative free cash flow. Its negative free cash flow position has ranged from roughly $3 billion to more than $8 billion over the last five years. For the LTM 31 March 2022, NEECH's cash flow from operations was $2.6 billion compared to capital expenditures of $7.4 billion and dividends of $0.6 billion. As has been the case, NEECH managed to finance the resulting negative free cash flow of about $5.4 billion through a combination of project finance debt, tax equity, recycling of capital through asset sales and long-term debt issuances.

As of 31 March 2022, NEECH had $7.4 billion of net available liquidity, which included $1.4 billion of cash; $7.5 billion of availability on its revolving credit facilities, net of about $1.4 billion of commercial paper borrowings; and full availability on $3.1 billion of bilateral revolving credit facilities. NEECH's nearly $5.3 billion bank revolving line of credit facility backstops its CP program. As with FPL's core revolvers, the commitments are laddered, with the vast majority terminating in 2027. This facility does not contain a material adverse change clause on new borrowings. NextEra's next significant debt maturity is a $2 billion debenture at NEECH that will mature in March 2023.

Rating methodology and scorecard factor

Exhibit 13
Methodology Scorecard Factors
NextEra Energy, Inc.

Regulated Electric and Gas Utilities Industry Scorecard [1][2]	Current LTM 3/31/2022		Moody's 12-18 Month Forward View As of Date Published [3]	
Factor 1 : Regulatory Framework (25%)	**Measure**	**Score**	**Measure**	**Score**
a) Legislative and Judicial Underpinnings of the Regulatory Framework	A	A	A	A
b) Consistency and Predictability of Regulation	Aa	Aa	Aa	Aa
Factor 2 : Ability to Recover Costs and Earn Returns (25%)				
a) Timeliness of Recovery of Operating and Capital Costs	A	A	A	A
b) Sufficiency of Rates and Returns	A	A	A	A
Factor 3 : Diversification (10%)				
a) Market Position	Aa	Aa	Aa	Aa
b) Generation and Fuel Diversity	A	A	A	A
Factor 4 : Financial Strength (40%)				
a) CFO pre-WC + Interest / Interest (3 Year Avg)	6.0x	A	6x - 6.5x	Aa
b) CFO pre-WC / Debt (3 Year Avg)	16.0%	Baa	17% - 18%	Baa
c) CFO pre-WC – Dividends / Debt (3 Year Avg)	10.7%	Baa	10% - 11%	Baa
d) Debt / Capitalization (3 Year Avg)	50.2%	Baa	48% - 51%	Baa
Rating:				
Scorecard-Indicated Outcome Before Notching Adjustment		A2		A2
HoldCo Structural Subordination Notching		-2		-2
a) Scorecard-Indicated Outcome		Baa1		Baa1
b) Actual Rating Assigned		(P)Baa1		(P)Baa1

[1] All ratios are based on 'Adjusted' financial data and incorporate Moody's Global Standard Adjustments for Non-Financial Corporations.
[2] As of 3/31/2022(L)
[3] This represents Moody's forward view; not the view of the issuer; and unless noted in the text, does not incorporate significant acquisitions and divestitures.
Source: Moody's Financial Metrics

Appendix

Exhibit 14

Cash Flow and Credit Metrics [1]

CF Metrics	Dec-18	Dec-19	Dec-20	Dec-21	LTM Mar-22
As Adjusted					
FFO	**7,424**	**7,800**	**8,728**	**8,751**	**9,558**
+/- Other	-137	138	-234	-272	-196
CFO Pre-WC	**7,287**	**7,938**	**8,494**	**8,479**	**9,362**
+/- ΔWC	-693	214	-560	-951	-1,164
CFO	**6,594**	**8,152**	**7,934**	**7,528**	**8,198**
- Div	2,144	2,468	2,787	3,066	3,147
- Capex	12,910	12,234	13,504	15,228	15,546
FCF	**-8,460**	**-6,550**	**-8,358**	**-10,766**	**-10,495**
(CFO Pre-W/C) / Debt	19.5%	18.8%	17.8%	15.5%	15.7%
(CFO Pre-W/C - Dividends) / Debt	13.8%	12.9%	11.9%	9.9%	10.4%
FFO / Debt	19.9%	18.4%	18.2%	16.0%	16.1%
RCF / Debt	14.2%	12.6%	12.4%	10.4%	10.8%
Revenue	16,727	19,204	17,997	17,069	16,233
Interest Expense	1,549	2,343	2,094	1,387	1,387
Net Income	3,122	3,084	2,397	3,267	1,156
Total Assets	103,608	117,556	127,516	140,773	144,806
Total Liabilities	68,987	79,892	90,212	102,764	108,112
Total Equity	34,621	37,664	37,304	38,009	36,694

[1] All figures and ratios are calculated using Moody's estimates and standard adjustments. Periods are Financial Year-End unless indicated. LTM = Last Twelve Months
Source: Moody's Financial Metrics

Exhibit 15

Peer Comparison Table [1]

	NextEra Energy, Inc. (P)Baa1 (Stable)			Berkshire Hathaway Energy Company A3 (Stable)			Duke Energy Corporation Baa2 (Stable)			Sempra Energy Baa2 (Stable)			Dominion Energy, Inc. Baa2 (Stable)		
(In US millions)	FYE Dec-20	FYE Dec-21	LTM Mar-22	FYE Dec-20	FYE Dec-21	LTM Mar-22	FYE Dec-20	FYE Dec-21	LTM Mar-22	FYE Dec-20	FYE Dec-21	LTM Mar-22	FYE Dec-20	FYE Dec-21	LTM Mar-22
Revenue	17,997	17,069	16,233	20,952	25,150	25,099	23,868	25,097	26,079	11,370	12,857	13,418	14,172	13,964	14,373
CFO Pre-W/C	8,494	8,479	9,362	7,323	8,541	8,488	9,407	9,941	10,255	4,283	2,909	2,780	5,301	5,063	4,967
Total Debt	47,833	54,651	59,517	55,406	53,822	53,805	63,702	69,474	71,677	25,995	25,844	28,094	39,347	42,118	43,294
CFO Pre-W/C + Interest / Interest	5.1x	7.1x	7.7x	4.7x	5.0x	5.0x	5.1x	5.2x	5.2x	4.3x	3.2x	3.1x	4.3x	4.2x	3.9x
CFO Pre-W/C / Debt	17.8%	15.5%	15.7%	13.2%	15.9%	15.8%	14.8%	14.3%	14.3%	16.5%	11.3%	9.9%	13.5%	12.0%	11.5%
CFO Pre-W/C – Dividends / Debt	11.9%	9.9%	10.4%	13.0%	14.8%	14.7%	10.4%	9.9%	10.0%	10.7%	4.9%	3.8%	6.3%	7.3%	6.8%
Debt / Capitalization	47.1%	49.9%	52.8%	49.3%	46.2%	46.3%	52.5%	53.7%	54.4%	48.6%	45.6%	47.2%	55.2%	54.9%	55.3%

[1] All figures & ratios calculated using Moody's estimates & standard adjustments. FYE = Financial Year-End. LTM = Last Twelve Months. RUR* = Ratings under Review, where UPG = for upgrade and DNG = for downgrade
Source: Moody's Financial Metrics

Ratings

Exhibit 16

Category	Moody's Rating
NEXTERA ENERGY, INC.	
Outlook	Stable
Issuer Rating	Baa1
Senior Unsecured Shelf	(P)Baa1
Jr Subordinate Shelf	(P)Baa2
Pref. Shelf	(P)Baa3
TRANS BAY CABLE LLC	
Outlook	Stable
Issuer Rating	Baa2
NEXTERA ENERGY CAPITAL HOLDINGS, INC.	
Outlook	Stable
Senior Unsecured	Baa1
Bkd Jr Subordinate	Baa2
BACKED Pref. Shelf	(P)Baa3
Commercial Paper	P-2
FLORIDA POWER & LIGHT COMPANY	
Outlook	Stable
Issuer Rating	A1
First Mortgage Bonds	Aa2
Senior Secured	Aa2
Senior Unsecured	A1
Commercial Paper	P-1
Other Short Term	VMIG 1
NEXTERA ENERGY OPERATING PARTNERS, LP	
Outlook	Stable
Bkd Senior Unsecured	Ba1/LGD4
GULF POWER COMPANY	
Outlook	No Outlook
Issuer Rating	A1
Senior Unsecured	A1
Commercial Paper	P-1
NEXTERA ENERGY PARTNERS, LP	
Outlook	Stable
Corporate Family Rating	Ba1
Speculative Grade Liquidity	SGL-2

Source: Moody's Investors Service

REPORT NUMBER 1331186

Moody's
INVESTORS SERVICE

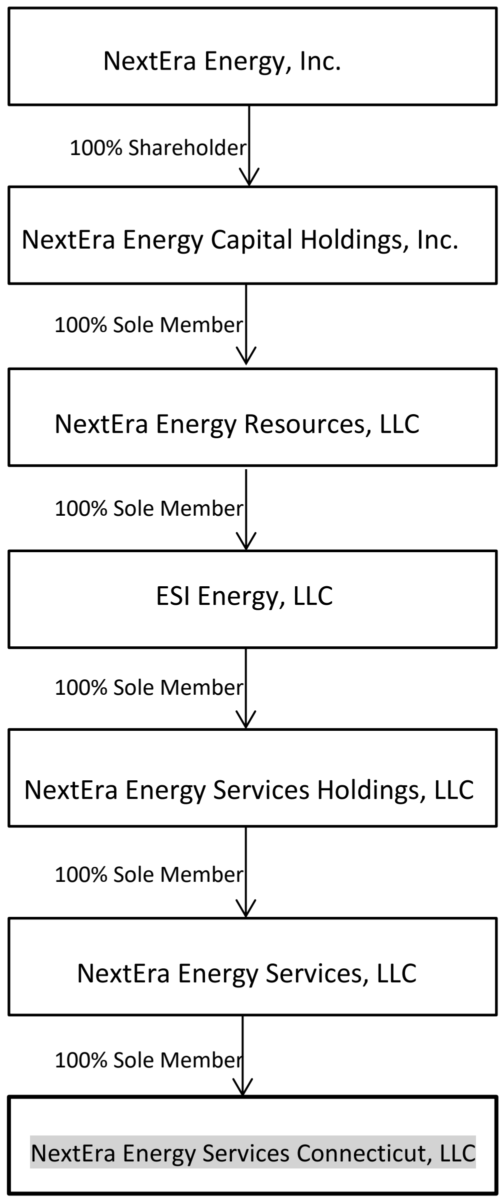
C-8: CORPORATE STRUCTURE

Please see attached the corporate structure of NextEra Energy Services Ohio, LLC ("NextEra Energy Services"). NextEra Energy Services and its affiliates engage in the competitive retail sale of electricity throughout the United States, as further set forth in Exhibits B-2, D-1 and D-2.

Also, as further shown in the attached corporate structure and explained in Exhibit B-1, NextEra Energy Services is an affiliate of NextEra Energy Inc., which, through its affiliates and subsidiaries, provides wholesale electric services throughout the United States. Please see attached information about NextEra Energy Inc., and its energy portfolio. Further information may be obtained at www.nexteraenergyresources.com.

EXHIBIT C-8: Corporate Structure
NextEra Energy Services Ohio, LLC
CRES # 08-145 Renewal Application

Reflects organizational structure
as of September 1, 2022



C-9: FINANCIAL ARRANGEMENTS

NextEra Energy Services Ohio, LLC intends to rely upon NextEra Energy Inc. ("NextEra Energy") affiliates for funding of its retail electricity operations in Ohio. Financing, investment and banking activities for NextEra Energy affiliates are sourced through an affiliate of NextEra Energy as part of an overall cash management and corporate funding program. NextEra Energy affiliates make cash, cash equivalents, letters of credit, guarantees and other cash resources available to NextEra Energy Services Ohio, LLC on an as needed basis.

In accordance with the requirements, NextEra Energy Services Ohio, LLC is providing a current statement from First Energy which shows NextEra Energy Services is in compliance with their collateral and security requirements.

FirstEnergy

August 30, 2022

NextEra Energy Services Ohio, LLC
Paula Williams, Principal Regulatory Affairs Analyst
NextEra Energy, Inc.

Re: NextEra Energy Services Ohio, LLC Status with FirstEnergy Ohio Utilities (Ohio Edison Company, The Cleveland Electric Illuminating Company, The Toledo Edison Company)

To Whom It May Concern:

NextEra Energy Services Ohio, LLC, a certified competitive retail electric service provider in Ohio, has satisfied and is currently in compliance with our collateral and security requirements for FE OH Utilities (Ohio Edison, Toledo Edison, and Cleveland Electric).

FirstEnergy Corp.

Justin Gawne
Name: Justin Gawne
Title: Credit Risk Analyst
Phone: 330-315-7226

D-2: OPERATIONS EXPERTISE AND KEY TECHINCIAL PERSONNEL

Please refer to Exhibit B-2 which details the substantial experience of NextEra Energy Services Ohio, LLC's ("NextEra Energy Services") management and affiliates in the competitive retail electricity supply market. Specifically, as provided in those Exhibits, NextEra Energy Services and its' affiliate based in Houston, Texas, have over 300 employees. Through its affiliates NextEra Energy Services serves over 950,000 residential and commercial customers in 25 competitive markets across the United States. As a company, NextEra Energy Services has been engaged in the competitive sale of retail electricity in Texas since 2002, when the Texas market first became competitive.

As a result, NextEra Energy Services affiliates have developed substantial experience and expertise in all facets of competitive retail electricity supply including, among other things, enrolling and switching customers, developing market-driven, competitive products, call center operations, billing, invoicing and record-keeping, forecasting and hedging, customer service, data and information exchange and coordination with utilities, and through its affiliate, NEM, as explained in Exhibit D-1, management of power supply obligations, including all scheduling and balancing.

NextEra Energy Services Ohio, LLC's key technical personnel's names, titles, e-mail addresses, telephone numbers. Please see attached bios of key technical personnel.

- Grit Farrell, Vice President of Operations
  grit.farrell@nee.com
  713.401.5713

- Cynthia Morrow, Controller

  cynthia.morrow@nee.com

  936.203.7439

- Stephen Jensen, Sr. Director Supply & Load Forecasting

  stephen.jensen@nee.com

  346.225.0806

Grit Farrell

SUMMARY

Extensive experience in both retail and wholesale deregulated power markets spanning almost two decades. Successful at developing and managing high-performing teams. Expertise in product structuring, renewable solutions, managing retail supply risk, load forecasting, and asset management. Acknowledged for being a hard-working, fast learning leader with great initiative, excellent analytical and communication skills.

PROFESSIONAL EXPERIENCE

GEXA ENERGY, HOUSTON, TX

VICE PRESIDENT AND GENERAL MANAGER, MASS MARKETS — ***2022 - CURRENT***

Lead the company's residential and small commercial business for power and gas in deregulated markets across the United States, including development and execution of all mass markets strategies

VICE PRESIDENT, SUPPLY AND LOAD FORECASTING — ***2018 - 2022***

Responsible for managing company's retail supply and load forecasting functions across North America

- Managed company's commodity risk in deregulated power markets, including ERCOT, PJM, ISO NE
- Lead short- and long-term energy commodity forecasting function of Gexa's competitive retail load across U.S. markets
- Responsible for regulatory compliance of state renewable energy programs

DIRECTOR, RETAIL SUPPLY — ***2015 - 2018***

Managed seasonal supply risk exposure in ERCOT and Northeast markets

- Modeled and quantified energy and capacity risk exposure from adverse weather and price events
- Recommended and implemented tail risk hedges to limit company's commodity's risk exposure
- Completed retirement and compliance filings for state renewable energy programs

DIRECTOR, NEW MARKETS AND PERFORMANCE IMPROVEMENT — ***2013 - 2015***

Improved capability to serve large customers on complex product structures

- Developed new pass-through products for a large customers in ERCOT, PJM and MISO
- Lead project to re-platform back office system

NRG ENERGY (FORMERLY GENON ENERGY, RRI ENERGY, RELIANT ENERGY), HOUSTON, TX

DIRECTOR, PJM WEST — ***2008 - 2013***

Managed commercial optimization of 17 power plant stations in the PJM and MISO power markets. Developed energy and capacity offer strategies. Identified and managed risk.

- Developed a structured approach to making best optimization decisions based on market conditions, plant availability, and market rules with the result of regularly exceeding group's goals
- Effectively procured gas for gas assets to ensure reliability, minimize imbalances charges, and maximize profits

ENERGY PORTFOLIO OPTIMIZATION MANAGER — ***2005 - 2008***

Optimized RRI's 8,200 MW generation portfolio in the Northeast and Midwest. Responsible for capacity market activities.

- Accurately offered energy and capacity products into the PJM and MISO power markets avoiding exposure to liability and loss

SENIOR STRUCTURING ANALYST - RETAIL GROUP ***2004 - 2005***
Provided product and structuring support to Reliant's large C&I sales force.

COMMODITY ANALYST - RETAIL GROUP ***2002 - 2004***
Supported Retail market expansion into PJM. Responsible for pricing large commercial and industrial retail deals in ERCOT and PJM markets.

EDUCATION

UNIVERSITY OF HOUSTON, *Houston, TX*

- BBA, Summa Cum Laude, Major: Finance, May, 2002 GPA 4.0 ***2002***
- Outstanding Undergraduate Student of 2002, Bauer College of Business
- Advanced Certificate of Professional Selling, *Program for Excellence in Selling*

UNIVERSITAET PASSAU, *Passau Germany* ***1997 - 1998***

CYNTHIA MORROW, CPA

PROFESSIONAL EXPERIENCE

Frontier Utilities/Gexa Energy, Houston, TX 01/15 - Current
Controller/Sr. Director

- Currently Sr. Director of Operations responsible for Customer Care, Billing and Collections in all markets
- Responsible for the Finance and Human Resources departments
- Responsible for monthly closing of the ledger, monthly report to management and annual audit
- Finance department is responsible for accounts payables, commissions accounting, all tax reporting, banking relationships and daily reconciliation of the customers payments received from third parties to the bank and sub ledgers
- Responsible for coordination of collateral postings and credit functions
- Responsible for the risk control and trade confirmation process
- Human resources department coordinate all hiring, employee evaluation process, employee policies, processing payroll and provides coordination with our third party HR group.

WG Consulting., Houston, TX 09/13 – 12/14
Consultant

- Interim assistant controller with various responsibilities including creating combining financial statements and related notes for a possible debt refinancing, review of journal entries, monthly reporting packages and account reconciliations.
- Provide technical accounting and financial reporting consultation and support to various clients. Assignments have included technical accounting research on topics such as hedge accounting, EPS calculations, business combinations, IFRS standards and SEC reporting support including cash flow preparation.

JPMORGAN CHASE & CO., Houston, TX 07/08 – 08/13
Vice President

- Product controller for the Global Commodities Principal Investments group and internal reporting manager for multiple Global Commodities lines of business including Principal Investments, Global Oil and North America Power & Gas. This included managing the monthly general ledger close, review of account reconciliations and preparation of monthly management reporting package with variance explanations and annual budgeting schedules.
- Coordinated the first year audit and audit report of a legal entity with over 150 subsidiaries including the consolidation, cash flow, drafting of footnotes and preparation of audit support schedules.
- Responsible for stand-alone financial reporting, consolidation and audits of various joint ventures
- Coordinated the transition of the power plant accounting staff from New Jersey to Houston
- Responsible for the monthly close of the international subsidiaries which involved a good understanding of foreign exchange accounting and IFRS standards.
- Manage SOX testing for the Houston office
- Prepared necessary corporate SEC required quarterly schedules

CALPINE CORPORATION, Houston, TX 01/06 – 06/08
Accounting Director

- Responsible for stand-alone financial reporting, consolidation and audits of various subsidiaries in order to meet debt reporting requirements
- Coordinated the development of a new centralized accounting group in Houston
- Responsible for corporate wide debt accounting and compliance
- Responsible for the ERCOT operational accounting group of Calpine Power Company
- Managed the monthly general ledger close and monthly SOX documentation for 8 power plants
- Prepared year end stand-alone financial statements and coordinate the year-end audit
- Participated in the annual budget process for each plant

- Provided management with regional financial reports, as needed

THE WOODLANDS CHRISTIAN ACADEMY, The Woodlands, TX 02/02 – 01/06

Controller

- Provided all of the financial and management reporting to both management and the Board of Directors for this non-profit school.
- Managed the annual budgeting, monthly general ledger close, accounts payable, accounts receivable and payroll.
- Responsible for overseeing the administrative functions within the school - IT, maintenance, purchasing and administrative support.

ENRON, Houston, TX 03/93 – 02/02

Enron Energy Services – Senior Director (09/00 – 02/02)

- Provided all accounting and risk management support to the Energy Asset Management group.
- Report and account for various risk positions.
- Responsible for the construction and lease accounting.
- Managed a group of 20 accountants located both in Houston and in various field locations.

Enron North America – Director, SAP Implementation (06/98 – 08/00)

- Managed the SAP Implementation for Enron's largest division.
- Configured the SAP Consolidation Module.

Enron Europe, London, England & Houston, TX – Director (11/96 – 05/98)

- Managed all aspects of the financial reporting, budgeting and accounting for Enron's London office.
- Responsibilities included supervising the generation of both a weekly and monthly reporting package to senior management, budgeting, risk management accounting, and accounts payables.
- Managed a staff of 25 accountants and clerks.

Enron Power Corporation, Houston, TX – Manager (03/93 – 10/96)

- Managed the joint venture accounting for various domestic and international power plants.
- Responsibilities included generation of monthly and annual financial statements and budgets for partners and auditors.
- Responsible for monitoring all contract and debt compliance.

DELOITTE & TOUCHE, Houston, TX & Washington, DC 08/88 – 03/93

Lead Auditor

- Specialized in the audit of not-for-profit entities, governments, school districts and mid-size clients.
- Performed compliance audits in accordance with related standards.

EDUCATION

TEXAS A&M UNIVERSITY

BBA, Accounting – May 1988

Certified Public Accountant in the State of Texas

STEPHEN JENSEN, CFA

ENERGY TRADING PROFESSIONAL

Innovative commercial leader with 19 years of experience in ERCOT's wholesale and retail electricity markets. Seasoned energy trader, adept at analyzing, identifying, and managing risk through standard trading instruments, well-defined process controls, and complex structured contracts.

EMPLOYMENT SUMMARY

Gexa Energy – Houston, Texas **May 2022 – Present**
Senior Director, Supply & Load Forecasting

- Lead a team responsible for forecasting, hedging and scheduling retail load in North American power markets.

Arpeggio Enterprises Inc. – Tomball, Texas **June 2021 – May 2022**
President

- Provided consulting services as a subject-matter expert on the ERCOT wholesale market.
- Helped clients assess the impact of Winter Storm Uri in ERCOT and enhanced their framework for evaluating the market, allowing for increased confidence in valuation estimates for energy contracts.
- Assisted a startup Data company with launch and expansion by helping to secure major strategic partnerships and raise new equity capital.
- Prepared a client for expansion of battery storage asset optimization activities into US power markets.

Wilkinson Capital Partners – Lehi, Utah **May 2021 – October 2021**
Chief Financial Officer

- Analyzed and performed valuations on numerous business partnership and acquisition proposals to identify promising opportunities for private investment.

Direct Energy – Houston, Texas **Aug 2004 – May 2021**
Director, ERCOT Power *2015 - 2021*

- Responsible for Direct Energy's wholesale trading activities in ERCOT, including hedging retail load obligations, proprietary trading, wholesale customer flow and QSE services, real-time operations, and the origination and optimization of renewable PPA's and virtual tolling agreements, enabling the company to serve ~4GW of peak load without owning power generation assets.
- Advocated for favorable regulatory policies at ERCOT and the PUC of Texas through cooperation with regulatory affairs team as well as direct interaction with ERCOT and PUC leadership and staff.
- Developed and implemented new retail products in support of retail C&I business in ERCOT.
- Collaborated with other functional teams across the company to ensure that Direct Energy can effectively understand, measure, and mitigate all risks inherent in the energy commodity and services business, including but not limited to energy and ancillary prices, grid congestion, weather, credit, operational, regulatory, compliance, reputation, and macroeconomic risk.
- Ensured continuity of trading operations with minimal impact to customers during major business interruption events including hurricanes and the Covid-19 pandemic.

Head of ERCOT Optimization *2010 - 2015*

- Responsible for commercial optimization for ~1300MW of combined-cycle power plants in ERCOT, maximizing value through trading while collaborating with plant maintenance and operations to plan outages, balancing reliability requirements with market opportunities and risks.

- Recommended and implemented significant changes to plant dispatch patterns in combination with participation in both forward and spot markets for energy and ancillary services, leading to fewer forced outages and higher economic value from successful operation throughout periods of unprecedented scarcity pricing in ERCOT.
- Structured and executed virtual tolling agreements upon the sale of Direct Energy's ERCOT power plant fleet and optimized the agreements in support of Direct Energy's retail power business.
- Responsible for oversight of proprietary trading books and management of wind PPA's.

Senior Manager, ERCOT Trading *2007 - 2010*
- Hedged Direct Energy's ERCOT load obligations and wind PPA's in the cash and forward markets.
- Contributed incremental economic value through proprietary trading in the ERCOT cash market.

Manager / Senior Analyst, ERCOT Structuring & Portfolio Management *2004 - 2007*
- Managed Direct Energy's ERCOT retail pricing desk.
- Developed pricing models and maintained pricing curves through regular analysis and review of non-market-based costs that are allocated to retail electric providers.
- Developed new products for Direct Energy's commercial & industrial business in ERCOT.

Reliant Energy, Inc. / Reliant Resources, Inc. – Houston, Texas **2001 – 2004**
Summer Associate / MBA Associate
- Analyzed regulatory tariffs, developed and maintained retail margin forecasting models, analyzed and reconciled results, and presented findings and recommendations to senior management.
- Collaborated with C&I sales leadership and ERCOT trading desk to forecast anticipated energy supply requirements and facilitate hedging activities.

Cap Gemini Ernst & Young U.S. LLC – Irving, Texas **1997 –2000**
Senior Consultant / Staff Consultant
- Worked on the technical design, software development and testing activities of several major system implementations using PeopleSoft's enterprise resource planning software.

EDUCATION

University of Texas at Austin, McCombs School of Business
Master of Business Administration, Energy Finance

University of Texas at Austin
Bachelor of Business Administration, Business Honors and Management Information Systems

University of Michigan – Ann Arbor, Michigan
Music Performance (completed 2 semesters)

COMMUNITY INVOLVEMENT AND INTERESTS

The Church of Jesus Christ of Latter-Day Saints
Full-Time Representative for 2 Years in Santiago, Chile
Composer & Arranger of Piano Solo & Choral Music
Organist & Choir Accompanist

Boy Scouts of America
Venturing Crew Advisor
Scoutmaster
Eagle Scout

Competitive Retail Electric Service Affidavit

County of Harris **:**

State of Texas **:**

Aundrea Williams, Affiant, being duly sworn/affirmed, hereby states that:

1. The information provided within the certification or certification renewal application and supporting information is complete, true, and accurate to the best knowledge of affiant, and that it will amend its application while it is pending if any substantial changes occur regarding the information provided.

2. The applicant will timely file an annual report of its intrastate gross receipts, gross earnings, and sales of kilowatt-hours of electricity pursuant to Sections 4905.10(A), 4911.18(A), and 4928.06(F), Ohio Revised Code.

3. The applicant will timely pay any assessment made pursuant to Sections 4905.10, 4911.18, and 4928.06(F), Ohio Revised Code.

4. The applicant will comply with all applicable rules and orders adopted by the Public Utilities Commission of Ohio pursuant to Title 49, Ohio Revised Code.

5. The applicant will cooperate fully with the Public Utilities Commission of Ohio, and its Staff on any utility matter including the investigation of any consumer complaint regarding any service offered or provided by the applicant.

6. The applicant will fully comply with Section 4928.09, Ohio Revised Code regarding consent to the jurisdiction of Ohio Courts and the service of process.

7. The applicant will comply with all state and/or federal rules and regulations concerning consumer protection, the environment, and advertising/promotions.

8. The applicant will use its best efforts to verify that any entity with whom it has a contractual relationship to purchase power is in compliance with all applicable licensing requirements of the Federal Energy Regulatory Commission and the Public Utilities Commission of Ohio.

9. The applicant will cooperate fully with the Public Utilities Commission of Ohio, the electric distribution companies, the regional transmission entities, and other electric suppliers in the event of an emergency condition that may jeopardize the safety and reliability of the electric service in accordance with the emergency plans and other procedures as may be determined appropriate by the Commission.

10. If applicable to the service(s) the applicant will provide, it will adhere to the reliability standards of (1) the North American Electric Reliability Council (NERC), (2) the appropriate regional reliability council(s), and (3) the Public Utilities Commission of Ohio.

11. The Applicant will inform the Public Utilities Commission of Ohio of any material change to the information supplied in the application within 30 days of such material change, including any change in contact person for regulatory purposes or contact person for Staff use in investigating consumer complaints.

12. The facts set forth above are true and accurate to the best of his/her knowledge, information, and belief and that he/she expects said applicant to be able to prove the same at any hearing hereof.

13. Affiant further sayeth naught.

Andrea Williams Vice President, Regulatory

Signature of Affiant & Title

Sworn and subscribed before me this 08 day of September, 2022
Month Year

Paula Williams
Signature of official administering oath

Paula Williams, Notary
Print Name and Title

PAULA WILLIAMS
My Notary ID # 125898518
Expires November 2, 2026

My commission expires on 11-02-2026