## **EXHIBIT C – Affiliate Charges**

# NextEra Energy Transmission, LLC ("NEET")

FUNCTIONAL	DESCRIPTION OF SERVICES	CHARGE METHOD	Formula Inputs
AREAS			<b>Update Frequency</b>
Accounting	Provides regulatory accounting support.	Direct Billed	Annually
Business Management	Provides executive and management direction for implementation of strategies, processes, and policies for financial planning and forecasting, affiliate transactions, corporate compliance, and business activities; corporate financial, due diligence, and business reporting; financial transaction monitoring; preparation of debt funding estimates; assistance with the preparation of cost projections, estimates and annual five-year plans; and assistance with the preparation and execution of regulatory filings.	Direct Billed	Annually
Development	Provides development, transmission planning services, GIS and mapping services	Direct Billed	Annually
Transmission Operations	Provides oversight and support in implementation of standardized transmission operations processes and procedures for the system control center, energy management system, field asset assessment and maintenance, event response, and reporting through interfaces with FPL Transmission & Substation organization and other corporate support organizations.	Direct Billed	Annually

# NextEra Energy Resources, LLC ("NEER")

FUNCTIONAL AREAS	DESCRIPTION OF SERVICES	CHARGE METHOD	Formula Inputs Update Frequency
Accounting and Finance	General accounting, accounts payable, property tax and tax research, project valuation and modeling.		Annually
		AMF	Annually

DESCRIPTION OF SERVICES	CHARGE METHOD	Formula Inputs
Dravidas financial reporting month		Update Frequency
SAP table maintenance, Sarbanes-		
Oxley Section 404		
	AMF	Annually
*		
day-to-day operations.		
Evaluates technical issues related to	Direct Billed	Annually
capabilities.		
	Direct Billed	Annually
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	Dina -4 Dilla J	A
Č 11	Direct Billed	Annually
connectivity and deploying the		
network and servers.		
SAP support, data management		
	Diment Dilled	A marrolly:
	Direct Billed	Annually
	Direct Billed	Annually
construction contracts, debt and equity		
structuring, real estate office lease		
negotiations and contracts, employment		
easement agreements.		
Chief legal counsel and corporate	AMF	Annually
secretaries.		1 111100011
e PSC CEFS NoF a c EF b ind c ms s m f F s c s m f	Oxley Section 404 compliance/administration.  Provides senior management oversight, strategic direction and governance for NEER, NEET and their subsidiaries' day-to-day operations.  Evaluates technical issues related to interconnection requests and facility capabilities.  Provides recruiting and hiring for non-operations personnel, terminations, compensation, and day-to-day personnel support.  Provides general support for elecommunications infrastructure including determining overall technical direction, developing network connectivity and deploying the network and servers.  SAP support, data management systems and desk-top support for electivity and desk-top support for electivity and maintained by NEER.  Services include bidding, vendor negotiating, and material purchasing for substation equipment.  Provides legal services including support for financing contracts, construction contracts, debt and equity structuring, real estate office lease negotiations and contracts, employment aw support, title commitments, land purchase agreements, and right of way casement agreements.  Chief legal counsel and corporate	and closing functions, financial blanning and forecasting, income and blanning and forecasting, income and blanning and torecasting, income and blanning and use tax, senior management oversight, SAP support: role approvals, sole changes, user access, and custom SAP table maintenance, Sarbanes-Dxley Section 404 compliance/administration.  Provides senior management oversight, strategic direction and governance for NEER, NEET and their subsidiaries' day-to-day operations.  Evaluates technical issues related to interconnection requests and facility capabilities.  Provides recruiting and hiring for non-operations personnel, terminations, compensation, and day-to-day operations personnel support.  Provides general support for elecommunications infrastructure including determining overall technical direction, developing network connectivity and deploying the network and servers.  SAP support, data management systems and desk-top support for electivity and deploying the network and servers.  SAP support, data management systems owned, operated and maintained by NEER.  Services include bidding, vendor negotiating, and material purchasing for substation equipment.  Provides legal services including contracts, construction contracts, debt and equity structuring, real estate office lease negotiations and contracts, employment aw support, title commitments, land burchase agreements, and right of way easement agreements.  Chief legal counsel and corporate AMF

# Florida Power & Light Company ("FPL")

FUNCTIONAL AREAS	DESCRIPTION OF SERVICES	CHARGE METHOD	Formula Inputs Update Frequency
Accounting, Finance and Treasury	Specific support unique to NEET New York such as regulatory accounting treatment and analysis, and rate case consultation.	Direct Billed	Annually
	Provides oversight of all finance functions of NextEra Energy Inc. and subsidiary and affiliated companies including, investor relations, Controller's staff, Sarbanes-Oxley internal controls and compliance, financial reporting and forecasting, accounting policy and analysis, investments, risk management, corporate tax, and cost allocations.	CSC	Annually
	Provides analysis of financing activities, evaluation of new financing vehicles and instruments, and supporting investment activities and banking		
Corporate Communications	Provides department management and administration, email, employee communication, centralized services, interactive and social media.	CSC	Annually
Corporate Governance	Executive officers of NextEra Energy who are engaged in strategic, tactical and compliance related activities. Also includes activities associated with the NextEra Energy Board of Directors.	CSC	Annually
Corporate Real Estate	Services include identifying the location for, and leasing of, office space.	Direct Billed	Annually
	Also includes billing for furniture use and office space.	Direct Assigned	Annually
	Mail and inter-site courier services.	CSC	Annually
Corporate Security	Responsibilities include, but are not limited to, security investigations, security technology, contract security officers, serious injury notification process, card access/identification systems and central station monitoring.	Direct Billed	Annually
	Responsible for physical security of company facilities, including	CSC	Annually

FUNCTIONAL AREAS	DESCRIPTION OF SERVICES	CHARGE METHOD	Formula Inputs Update Frequency
	asset protection, law enforcement liaison, critical incident response, security awareness resources, operational security program, safe and secure workplace program.		
Engineering and Construction	Provides management oversight for the project cost and schedule controls and invoice processing personnel, and consulting for switchyard and substation electrical systems and major equipment.	Direct Billed	Annually
Human Resources	Provides operations personnel recruiting services.	Direct Billed	Annually
Information	Performs safety campaigns, compensation and benefits administration, talent acquisition administration, background checks and drug testing, Workforce analytics, Equal Employment Opportunity.  Commission ("EEOC") compliance, workers compensation and safety oversight, administration of employee development, payroll processing, employee call center, health and well-being administration  Performs support for remote	CSC  Direct Billed	Annually
Technology  access, developing network connectivity and deploy servers for field offices control centers.			
	Corporate and operations system applications.	Direct Assigned	Annually
	Management and administration of enterprise hardware and software systems.	CSC	Annually
Integrated Supply Chain	Services include bidding, vendor negotiating, and material purchasing for substation equipment.	Direct Billed	Annually
	Business analytics, supplier diversity, master contracts such as travel and other services that benefit the entire organization.	CSC	Annually

FUNCTIONAL AREAS	DESCRIPTION OF SERVICES	CHARGE METHOD	Formula Inputs Update Frequency
Internal Audit	Audits or consultations specific to NEET New York.	Direct Billed	Annually
	Review of internal audits of company and affiliates, NERC compliance, FERC compliance, and Ethics office.	CSC	Annually
General Counsel/Environmental	Provides legal support for business units (e.g., litigation, labor, and employment, commercial contracting, corporate governance, regulatory proceedings as well as all other operational legal matters), monitoring compliance with federal, state and local laws, regulations and ordinances; and negotiating and reviewing agreements.  Services include outside legal reviews of annual report and SEC filings; Board of Directors; labor, employment and benefits support; and corporate records and document files handling.  Also includes environmental strategy and support services which cover compliance, water and wildlife, air, and hazardous substances.	CSC	Annually
Regulatory Affairs	Services include coordinating dockets for regulatory rulemaking policy, rate proceedings and other technical filings.	Direct Billed	Annually
Strategy, Policy and Process Improvement	Quality and process improvement training.	Direct Billed	Annually
	Provides risk identification and management; quality, planning and analysis for operational excellence.	CSC	Annually
Transmission and Substation Services	Central Maintenance - Provides maintenance administration; transmission line, substation and vegetation management and maintenance support services; provides support on substation environmental services for oil-	Direct Billed	Annually

FUNCTIONAL AREAS	DESCRIPTION OF SERVICES	CHARGE METHOD	Formula Inputs Update Frequency
	filled equipment and safety and switching training programs.		
	Engineering and Technical - Services include transmission line, substation and protection and control subject matter expertise (SME) in life cycle condition assessment and maintenance plans and processes.		
	SME technical engineering support; environmental support related to equipment and animal programs.		
	Transmission equipment consultative services and expertise (remote technical support); event analysis technical support (remote); subject matter expert (SME) technical support on all asset types in substations and lines.		
	Technology provides support and consulting services related to scoping, establishing and operating Supervisory Control and Data Acquisition (SCADA) and overall Energy Management Systems infrastructure and applications for transmission system operations and setup of control room and asset diagnostic analysis and capabilities.		
	Provides support services related to developing and implementing a standardized compliance program/process management.		
	Provides budgeting and affiliate billing and reporting support, internal communications and Six Sigma quality program management.		

NEET New York transacts with several affiliate companies for certain services and products. For the period covered under this report, see section II (D) of this report for the chart of products and services provided between NEET New York and its affiliate companies, the billing basis, and frequency of updates to the billing formula.

Affiliate costs are billed to NEET New York based on one of the three methodologies listed below:

1. **Direct Billed** – Time, travel expenses and other costs of resources used exclusively for the provision of services that are readily identified with an activity.

Services – Direct billed charges can be either external or internal. External direct billed charges are costs paid to third parties on behalf of NEET New York, such as travel expenses, temporary labor, consulting and legal services, insurance and general and administrative costs. Internal direct charges are labor costs, where personnel track time and charge to certain accounts set up to separately capture NEET New York support. Internal labor costs are transferred at a fully loaded rate by using the employee's actual salary plus adders, which cover benefits and administrative costs.

Any goods and services from an affiliate have been priced at levels that are fair and reasonable and reflect an amount that is no higher than the amount paid by other affiliates or divisions for the same services or items. In addition, as required by PURA, NEET New York does not subsidize the business activities of any of its affiliates with revenues from a regulated service. To provide consistency and ensure compliance, all goods and services provided by affiliates to NEET New York or any other affiliate are priced using the same cost allocation methodology.

2. **Assigned Costs** – Costs of resources used jointly in the provision of both NEET New York and an affiliate's activities that are apportioned using direct measures of cost causation. The billing allocation formula is determined to assign costs as accurately as possible based on a cost driver. The square footage cost of affiliate office space used by NEET New York activities would be an example of assignable costs.

Furniture – Office furniture charges are based on a weighted average rate that includes the cost for fully depreciated furniture for which no market exists, and market value for new furniture.

Office Space – Space is available to NEET New York in the affiliate's buildings when vacancies exist. This space may be utilized when a contractor or employee is required to be located at an affiliate's office when doing business on behalf of NEET New York. This space is utilized consistent with NEET New York's Code of Conduct and the Commission's substantive rules.

3. FPL Corporate Services Charge ("CSC") / NEER Affiliate Management Fee ("AMF") – During the time period covered by this report, NEET New York was charged a CSC and AMF from FPL and NEER, respectively. Costs allocated through these charges represent corporate staff shared services and capital costs incurred to support NEET New York and one or more affiliates that cannot be directly attributed to any single driver or function. These costs are accumulated and allocated to the companies through the CSC/AMF. For example, the costs associated with employee compensation benchmarking by FPL Human Resources is an example of unattributable costs allocated using the FPL CSC.

## **Cost Pool – Corporate Shared Services**

For both FPL and NEER, the Shared Service cost pool is determined annually through an extensive review of shared services and capital provided by NEET New York's affiliate companies. The review is performed in conjunction with the annual budget cycle and identifies products, services and capital benefiting multiple companies. These budgeted costs and capital are combined to obtain an estimated shared cost pool for the year. For FPL, shared costs are allocated to the benefiting companies using specific drivers (where available), or the Massachusetts Formula, which are applied to the actual costs charged to the cost pool. For NEER, these shared costs are allocated to the benefiting companies using specific drivers (where available), or the Massachusetts Formula, which are applied to estimated costs that get trued up to actuals periodically, usually in the fourth quarter of the current year and again in the first quarter of the following year, as needed.

## **Corporate Shared Services and Capital**

Below is an illustrative list of shared services typically used by the benefiting companies and included in the CSC/AMF. Shared services payroll dollars are loaded with taxes, insurance, pension, and welfare prior to their allocation.

### Allocation – Specific Drivers

The Information Technology and Human Resources Corporate Staff group shared costs are allocated to the benefiting companies by specific drivers. Other Corporate Services and certain Finance costs also have specific drivers to allocate shared costs to benefiting companies.

- **Information Technology** (Specific drivers relating to workstations, number of transactions, etc.)
  - Corporate Applications HR Employee Information System, Procurement, Financial Data Base, Email Systems
  - Communications & Technology Telecommunications (excluding Long Distance) and Network Operating Centers (NOC)
  - Distributed Systems Workstation, LAN and WAN Support
  - PC Services Help Desk and Workstation support
  - Amortization and ROI Shared Capitalized Hardware and Software

## • Human Resources (Specific drivers relating to head count)

- Employee Relations Safety Polices, Labor Relations Administration, and other employee related issues
- Shared Services Benefits Administration, Help Desk, Payroll, Educational Assistance, Recruiting, Equal Opportunity, Workforce Planning, Drug testing and NextEra University
- Benefit Programs

• Security Administration – Facility Security, Data Security

#### Allocation - Massachusetts Formula

Where there are no specific driver(s) for allocation of the cost pool(s), the weighted average of payroll, revenues and average gross property plant and equipment is used. This methodology is named the "Massachusetts Formula" and has been an industry standard in other regulatory areas for years. The forecasted amounts for each of the three components mentioned are collected from the benefiting companies and given equal weight. A simple average is then computed to yield a ratio for each benefiting company. The Massachusetts Formula is updated annually at a minimum, and for merger and acquisition activity as needed.

#### • Executive and Governance

• Salaries, benefits and expenses

#### Finance

- Accounting Cost Measurement & Allocation, Accounting Research & Financial Reporting
- Corporate Tax
- Finance and Trust Fund Investments
- Planning and Analysis
- Corporate Budgeting
- Risk Management

#### Corporate Communications

- Internal Communications
- External Media
- Annual Report

## • General Counsel/Environmental/Compliance

- Shareholder Services
- Board of Directors Fees
- Environmental Services

#### • Human Resources

• Mail Services – Courier and Mail Services

## • Engineering, Construction and Corporate Services

• Integrated Supply Chain – Administration of Corporate Travel and Integrated Supply Chain

#### • Internal Auditing Management

## • Strategy/Business Processes

- Corporate Operational Development
   Quality, Planning, Analysis
   Process Improvement Initiatives