

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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COMMISSION
CLERK

In re: DEF's Responses to Staff's Data
Request #1 concerning Recall of PV
Panels Manufactured by Advanced Solar
Photonics on Behalf of Blue Chip Energy
LLC..

Docket No. Undocketed

Dated: June 14, 2013

**DUKE ENERGY FLORIDA INC.'S
NOTICE OF FILING AFFIDAVIT**

Duke Energy Florida, Inc., ("DEF" or "Company"), hereby gives notice of filing the affidavit of Lee Guthrie in support of DEF's Request for Confidential Classification regarding portions of DEF's Responses to Staff's First Informal Data Request (Nos. 1-22) dated May 22, 2013.

RESPECTFULLY SUBMITTED this 14th day of June, 2013.



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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: DEF's Responses to Staff's Data
Request #1 concerning Recall of PV
Panels Manufactured by Advanced Solar
Photonics on Behalf of Blue Chip
Energy LLC..

Docket No. Undocketed

Dated: June 14, 2013

**AFFIDAVIT OF LEE GUTHRIE IN SUPPORT OF
DUKE ENERGY FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths,
personally appeared Lee Guthrie, who being first duly sworn, on oath deposes and says
that:

1. My name is Lee Guthrie. I am over the age of 18 years old and I have
been authorized by Duke Energy Florida, Inc. (hereinafter "DEF" or the "Company") to
give this affidavit in the above-styled proceeding on DEF's behalf and in support of
DEF's Request for Confidential Classification. The facts attested to in my affidavit are
based upon my personal knowledge.

2. I am the Manager of Florida Regulatory Strategy in the Customer
Planning and Analytics Department. This section is responsible for regulatory planning,
support and compliance of the Company's Demand-Side Management (DSM) programs.

3. As the Manager of Florida Regulatory Strategy, I am responsible, along
with the other members of the section, to ensure that all customers meet specific

requirements to participate in the Company's Residential & Commercial Photovoltaic Programs.

4. DEF is seeking confidential classification for portions its Responses to Staff's Solar Panel Recall Data Request submitted to Staff on June 14, 2013. The confidential information at issue is contained in confidential Exhibit A to DEF's Request for Confidential Classification and is outlined in DEF's Justification Matrix that is attached to DEF's Request for Confidential Classification as Exhibit C. DEF is requesting confidential classification of this information because it contains names and addresses of customers who have had certain Blue Chip panels installed, the disclosure of which would cause harm to those customers. The disclosure could harm the customer's rights to privacy.

5. The aforementioned discovery sought by Staff should be afforded confidential treatment because portions of the responses to these data requests, specifically responses to questions 8 and 11, contain names and addresses of customers who have had certain Blue Chip panels installed. The Company does not disclose information like customer names, addresses, and equipment installation information to the public, because it considers that information confidential and private information that belongs to its customers. By disclosing the customer names and addresses to the public, it would cause harm to those customers.

6. Strict procedures are established and followed to maintain the confidentiality of the names and addresses of customers who have had certain Blue Chip panels installed, including restricting access to those persons who need the information to assist the Company, and restricting the number of, and access to the information. At no

time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information and contracts at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 14th day of June, 2013.

(Signature)

Lee Guthrie
Manager – Florida Regulatory Strategy
Customer Planning and Analytics Dept.
Duke Energy Florida
Post Office Box 14042
St. Petersburg, FL 33733

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this _____ day of June, 2013 by Lee Guthrie. She is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

(Signature)

(Printed Name)

NOTARY PUBLIC, STATE OF FLORIDA

(Commission Expiration Date)

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

