



Matthew R. Bernier
Senior Counsel
Duke Energy Florida, Inc.

July 25, 2014

VIA OVERNIGHT MAIL

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

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COMMISSION
CLERK


Re: *Fuel and Purchased Power Cost recovery clause and Generating Performance Incentive Factor; Docket No. 140001-EI*

Dear Ms. Stauffer:

Please find enclosed for filing on behalf of Duke Energy Florida, Inc. ("DEF"), original and (7) copies of DEF'S 2015 Risk Management Plan for Fuel Procurement and DEF's Request for Confidential Classification for certain information contained in DEF's 2015 Risk Management Plan for Fuel Procurement. The original includes Attachments A, B, C and D.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Respectfully,


Matthew R. Bernier
Senior Counsel
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COM _____
AFD 2
APA 1
ECO 1 MRB/mw
ENG 1 Enclosures
GCL 1
IDM 1
TEL _____
CLK _____

Duke Energy Florida, Inc.

Docket No.: 140001

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 25th day of July, 2014.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 140001-EI

Dated: July 25, 2014

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**DUKE ENERGY FLORIDA INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida, Inc. ("DEF" or "Company"), pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), submits this Request for Confidential Classification for certain information contained in DEF's 2015 Risk Management Plan including attachments A, B, C, D, E, F, G, H, and I. In support of this Request, DEF states:

1. Certain information contained in DEF's 2015 Risk Management Plan, including certain information contained in Attachments A, B, C, D, E, F, G, H, and I, contains information that is "proprietary confidential business information" under Section 366.093(3), Florida Statutes.

2. The following exhibits are included with this request:

(a) Sealed Composite Exhibit A is a package containing unredacted copies of all the documents for which DEF seeks confidential treatment. Composite Exhibit A is being submitted separately in a sealed envelope labeled "CONFIDENTIAL." In the unredacted versions, the information asserted to be confidential is highlighted in yellow.

(b) Composite Exhibit B is a package containing two copies of redacted versions of the documents for which the Company requests confidential classification. The specific information for which confidential treatment is requested has been blocked out by opaque marker or other means.

(c) Exhibit C is a table which identifies by page and line the information for which DEF seeks confidential classification and the specific statutory bases for seeking confidential treatment.

(d) Exhibit D is an affidavit attesting to the confidential nature of information identified in this request.

3. As indicated in Exhibit C, certain information contained in DEF's 2015 Risk Management Plan, specifically information contained on pages 1 through 4 and Attachments A, B, C, D, E, F, G, H, and I, consists of "proprietary confidential business information" within the meaning of Section 366.093(3), F.S. The highlighted information in DEF's Risk Management Plan and enumerated Attachments provides fuel consumption and economy transaction projections for 2015, forecasted costs, hedging volumes, hedging percentages, internal policies and guidelines regarding hedging transactions, collateral summaries, and unrealized forecasted hedge values. Affidavit of James McClay at ¶¶ 5, 6. Disclosure of this information would enable fuel suppliers to have insight into DEF's internal risk management guidelines and to obtain competitive information, which would result in greater price convergence in future negotiations. Affidavit of James McClay at ¶ 5. As such, disclosure of the information would impair the Company's efforts to contract for goods or services on favorable terms. *See* § 366.093(3)(d), F.S.; Affidavit of James McClay ¶¶ 5, 6. Additionally, if the information at issue was publicly disclosed, DEF's efforts to obtain competitive energy supply that provides economic value to both DEF and its ratepayers could be compromised by DEF's competitors changing their consumption or purchasing behavior within the relevant markets. § 366.093(3)(e), F.S.; Affidavit of James McClay at ¶6. Accordingly, such information constitutes "proprietary confidential business information" which is exempt from disclosure under the Public Records Act pursuant to Section 366.093(1), F.S.

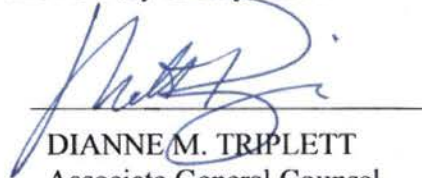
4. The information identified as Exhibit "A" is intended to be and is treated as

confidential by the Company. *See* Affidavit of James McClay ¶ 7. The information has not been disclosed to the public, and the Company has treated and continues to treat the information and contracts at issue as confidential. *See* Affidavit James McClay ¶ 7.

5. DEF requests that the information identified in Exhibit A be classified as “proprietary confidential business information” within the meaning of section 366.093(3), F.S., that the information remain confidential for a period of at least 18 months as provided in section 366.093(4) F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

WHEREFORE, for the foregoing reasons, DEF respectfully requests that this Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 25th day of July, 2014.

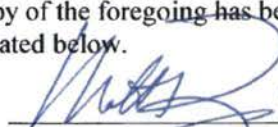


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Duke Energy Florida, Inc.
CERTIFICATE OF SERVICE
Docket No. 140001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email this 25th day of July, 2014 to all parties of record as indicated below.



Attorney name

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Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
2015 Risk Management Plan	<p>Page 1: volumes of coal & light oil.</p> <p>Page 2: volumes of natural gas & economy power purchases.</p> <p>Page 3 & 4: hedging percentages; hedging targets.</p> <p>Attachment A- "Fuel & Power Optimization Risk Management Guidelines" (entire document): internal risk control guidelines.</p> <p>Attachment B- "Collateral Summary" (entire document): summary of collateral held and margin thresholds.</p> <p>Attachment C- "Authority Limit Matrix" (entire document): internal approval authority thresholds and guidelines.</p> <p>Attachment D- Duke Energy's "Commodity Risk Policy" (entire document): internal risk control guidelines.</p> <p>Attachment E- Duke Energy's "Credit Policy" (entire document): internal</p>	<p>§366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

credit related risk control guidelines.

Attachment F - "DEF Fuels and Power Optimization Credit Risk Management Committee Guidelines" (entire document): internal guidelines.

Attachment G- "Delegation of Authority Matrix" (entire document): internal guidelines.

Attachment H- "Franchised Electric Risk Management Control Manual January 2014": All information on Pages 5 through 25 exclusive of section headings; All information on pages 26 through 35: Appendix A through Appendix G, exclusive of headings; Appendix I: all information exclusive of headings on pages 38 through 41.

Exhibit D
AFFIDAVIT OF
JAMES MCCLAY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 140001-EI

Dated: July 25, 2014

**AFFIDAVIT OF JAMES MCCLAY IN SUPPORT OF
DUKE ENERGY FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is James McClay. I am over the age of 18 years old and I have been authorized by Duke Energy Florida (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 Gas Trading in the Gas, Oil, and Power Department. This section is responsible for natural gas procurement and scheduling needed to support the gas generation needs for Duke Energy Indiana (DEI), Duke Energy Kentucky (DEK), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), and DEF Systems.

3. As the Manager of Gas Trading, I am responsible, along with the other members of the section for natural gas and oil procurement, scheduling, hedging

activities in the Fuel Procurement Section of the Systems Optimization Department for the Duke Energy regulation fleet for DEI, DEK, DEC, DEF and DEP.

4. DEF is seeking confidential classification for information contained on certain pages and attachments in the 2015 Risk Management Plan submitted on July 25, 2014. A detailed description of 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 sensitive business information, the disclosure of which would impair the Company's efforts to contract for goods or services on favorable terms.

5. DEF negotiates with potential fuel suppliers to obtain competitive contracts for fuel options that provide economic value to DEF and its ratepayers. In order to obtain such contracts, however, sensitive business information, such as forecasted volumes, hedging percentages, internal policies and guidelines, collateral summaries and unrealized forecasted hedge values, must be kept confidential. With respect to the information at issue in this Request, DEF has kept confidential and has not publicly disclosed confidential information such as forecasted costs, hedging volumes, hedging percentages, internal policies and guidelines, collateral summaries and unrealized forecasted hedge values. Without DEF's measures to maintain the confidentiality of sensitive terms, the Company's efforts to obtain competitive fuel supply contracts could be undermined, because potential fuel suppliers could simply offer the highest prices that would allow them to maintain marginally competitive position against the disclosed volumes and percentages.

6. Additionally, the disclosure of confidential information in DEF's forecasted fuel volumes and hedging percentages, could adversely impact DEF's competitive business interests. If such information was disclosed to DEF's competitors, DEF's efforts to obtain competitive fuel supply options that provide economic value to both DEF and its ratepayers could be compromised by DEF's competitors changing their consumption or purchasing behavior within the relevant markets.

7. Upon receipt of its own confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist the Company, and restricting the number of, and access to the information and contracts. At no time since receiving the contracts and 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.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 23 day of July, 2014.

James McClay
(Signature)
James McClay
Manager – Gas, Oil and Power Department
Duke Energy
526 South Church
Charlotte, NC 28202

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 23 day of July, 2014 by James McClay. He is personally known to me, or has produced his _____ driver's license, or his Duke Energy as identification.

(AFFIX NOTARY SEAL)



Rita G Kale
(Signature)
RITA G KALE
(Printed Name)
NOTARY PUBLIC, STATE OF NC
6/17/2014
(Commission Expiration Date)

(Serial Number, If Any)