

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

REDACTED

In re: Petition for Determination
of Need for Citrus County Combined Cycle
Power Plant, by Duke Energy Florida, Inc.

Docket No. 140110-EU

In re: Petition for Determination
of Cost Effective Generation Alternative
to Meet Need Prior to 2018, by Duke
Energy Florida, Inc.

Docket No. 140111-EI

Submitted: August 12, 2013

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COMMISSION
CLERK

NRG FLORIDA LP'S FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION

NRG Florida LP ("NRG") files this Request for Confidential Classification pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code and states:

1. On July 22, 2014, NRG filed its First Notice of Intent to Request Confidential Classification of certain documents provided in response to Duke Energy Florida, Inc.'s ("DEF") First Request for Production of Documents (No. 2). Specifically, NRG produced the following confidential documents, subject to its First Notice of Intent:

Workpapers of Jeffrey Pollock:

DEF POD 1. Doc 2. Analysis of CSCI.14LGBRA-NRGROG1-28-000001-000008
CONFIDENTIAL Results_Sensitivities_01212014a.xlsx

Workpapers of John Morris:

DEF POD 1. Doc 22. CSCI. CONFIDENTIAL. ERCOT Zone Prices.xlsx
DEF POD 1. Doc 23. CSCI. CONFIDENTIAL. ERCOT-Florida Profit Comparison_CKD.xlsx
DEF POD 1. Doc 24. CSCI. CONFIDENTIAL. fla_prices.xlsx
DEF POD 1. Doc 26. CSCI. CONFIDENTIAL. Osceola Annual Capacity Factors.xls
DEF POD 1. Doc 25. CSCI. CONFIDENTIAL. katy_prices.xlsx
DEF POD 1. Doc 31. CSCI. CONFIDENTIAL. Duke Energy Florida BAA Generation.xls
DEF POD 1. Doc 32. CSCI. CONFIDENTIAL. Ventyx Osceola Data.xls

COM _____
AFD _____
APA _____
ECO _____
ENG Redacted
GCL _____
IDM _____
TEL _____
CLK _____

Workpapers of Jim Dauer:

DEF POD 1. Doc 42. CSCI. CONFIDENTIAL. Osceola Daily Gas usage 2011 through 2013.xlsx

2. Section 366.093(1), Florida Statutes, states:

Upon request of the public utility or other person, any records

received by the commission which are shown and found by the commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s. 119.07(1).

3. The term “proprietary confidential business information” is defined in Section 366.093(3), Florida Statutes:

Proprietary confidential business information means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person’s or company’s business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. Proprietary confidential business information includes, but is not limited to:

* * *

(d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms.

(e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.

4. The confidential documents identified above are entitled to protection under Section 366.093(1), Florida Statutes and meet the definition in Section 366.093(3), Florida Statutes, because each document includes proprietary and confidential competitive business information and contractual data and competitively sensitive commercial information, the disclosure of which would adversely impact NRG’s competitive business interests. NRG has treated the information for which protection is sought as confidential, and has not voluntarily disclosed the information to the public.

5. Attached to this Request and incorporated herein for all purposes are the following supporting exhibits:

- Confidential Exhibit A: A sealed envelope containing a CD with an electronic copy of each document for which NRG requests confidential classification herein, with the confidential information highlighted;
- Exhibit B: A redacted version of each document provided in Confidential Exhibit A;
- Exhibit C: A justification table for the confidential information provided in Confidential Exhibit A; and
- Exhibit D: The supporting affidavit of Gordon Polozola.

WHEREFORE, NRG respectfully requests that the Commission grant its First Request for Confidential Classification, effective for a period of at least eighteen (18) months; and that the confidential documents be returned to NRG as required by Section 366.093(4), Florida Statutes, when it is no longer necessary for the Commission to conduct its business.

Respectfully submitted this 12th day of August, 2014.



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ATTORNEYS FOR NRG FLORIDA LP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following by electronic mail this 12th day of August, 2014:

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Attorney

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Submitted: August 12, 2014

CONFIDENTIAL

EXHIBIT A

TO

NRG FLORIDA LP'S FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION

(CD filed confidentially)

In re: Petition for Determination
of Need for Citrus County Combined Cycle
Power Plant, by Duke Energy Florida, Inc.

Docket No. 140110-EU

In re: Petition for Determination
of Cost Effective Generation Alternative
to Meet Need Prior to 2018, by Duke
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Docket No. 140111-EI

Submitted: August 12, 2013

Exhibit B

to

NRG Energy LP's

First Request for Confidential Classification

Exhibit B

**DEF POD 1. Doc 2. Analysis of CSCI.14LGBRA-NRGROG1-28-000001-000008
CONFIDENTIAL Results_Sensitivities_01212014a.xlsx**

The entire document is confidential.

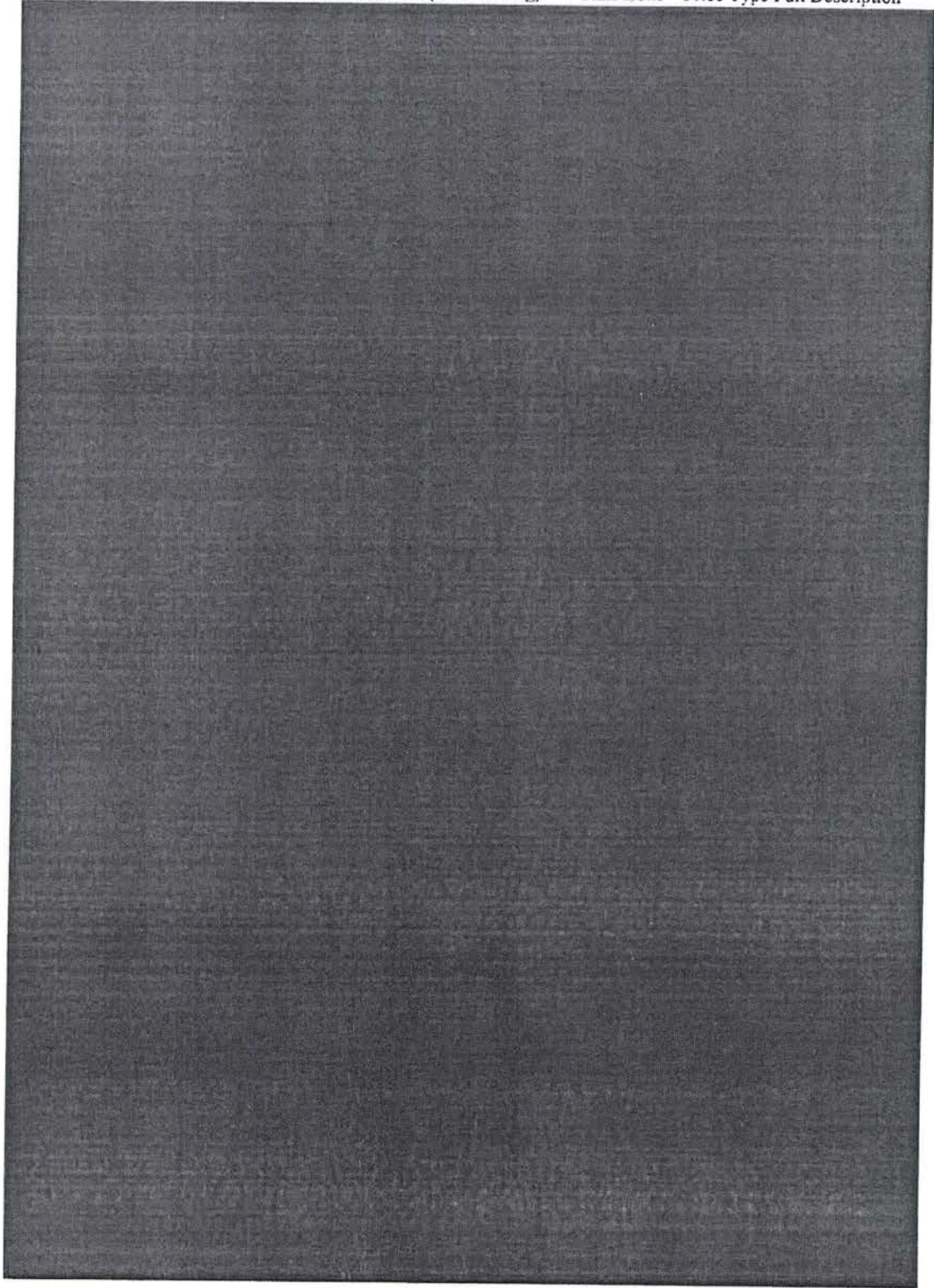
Exhibit B

DEF POD 1. Doc 22. CSCI. CONFIDENTIAL. ERCOT Zone Prices.xlsx

**This document is a data file that was not intended for print.
Only header pages are shown.**

~~COMPETITIVELY SENSITIVE CONFIDENTIAL INFORMATION~~

ISO Name Price Node Name Local Datetime (Hour Ending) Time Zone Price Type Full Description



Is Derived (Y/N) Price \$/MWh Record Count ISO Name ID Price Node ID

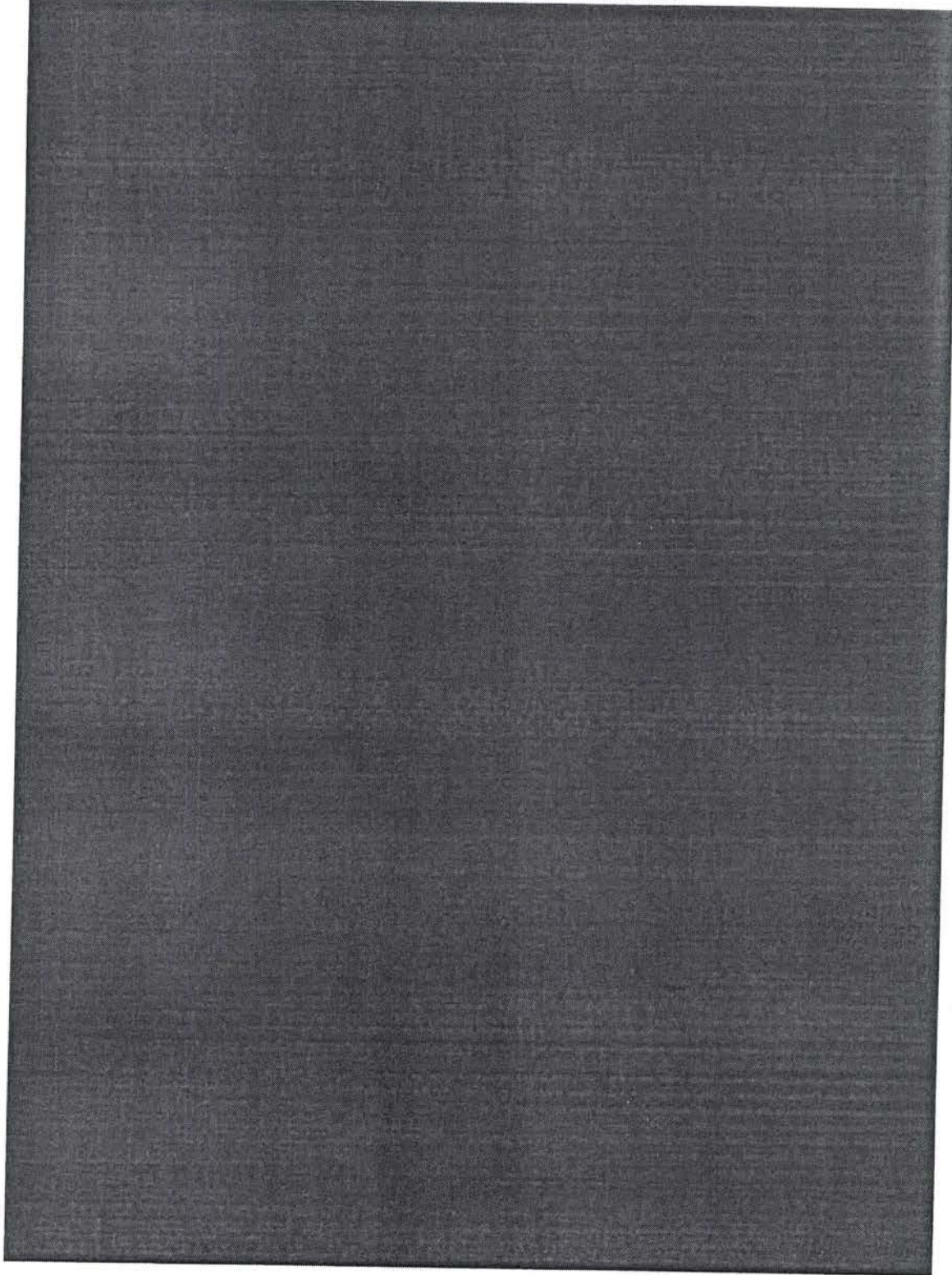
A large black rectangular redaction box covers the majority of the page content, obscuring all data rows and columns that would otherwise be visible in the table. Only the header information is legible.

Exhibit B

**DEF POD 1. Doc 23. CSCI. CONFIDENTIAL. ERCOT-Florida Profit
Comparison_CKD.xlsx**

**This document is a data file that was not intended for print.
Only header pages are shown.**

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Year	ERCOT	Florida
2011		
2012		
Average		

Sources: Ventyx Data; laty_prices.csv;
fla_prices.csv

COMPETITIVELY SENSITIVE CONFIDENTIAL INFORMATION

Year	Price		Gas Price		Capacity	Heat Rate			Sum
	Summer	Winter	Summer	Winter		CTG1	CTG2	CTG3	
2011	[REDACTED]								
2012									

Summer Calculation		Winter Calculation			Total Profitability Margin			
CTG2	CTG3	CTG1	CTG2	CTG3	CTG1	CTG2	CTG3	Total
[REDACTED]								

COMPETITIVELY SENSITIVE, CONFIDENTIAL INFORMATION

Hour	DAH Price \$/MWh	Gas Price	Capacity	Heat Rate			CTG1
				CTG1	CTG2	CTG3	
[Redacted Data]							

Calculation			Profitability Margin			Total
	CTG2	CTG3	CTG1	CTG2	CTG3	

Exhibit B

DEF POD 1. Doc 24. CSCI. CONFIDENTIAL. fla_prices.xlsx

**This document is a data file that was not intended for print.
Only the header page is shown.**

COMPETITIVELY SENSITIVE CONFIDENTIAL INFORMATION

date	fia
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2-Jan-11	
3-Jan-11	
4-Jan-11	
5-Jan-11	
6-Jan-11	
7-Jan-11	
8-Jan-11	
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16-Feb-11	
17-Feb-11	
18-Feb-11	
19-Feb-11	
20-Feb-11	

Exhibit B

DEF POD 1. Doc 25. CSCI. CONFIDENTIAL. katy_prices.xlsx

**This document is a data file that was not intended for print.
Only the header page is shown.**

COMPETITIVELY SENSITIVE / CONFIDENTIAL INFORMATION

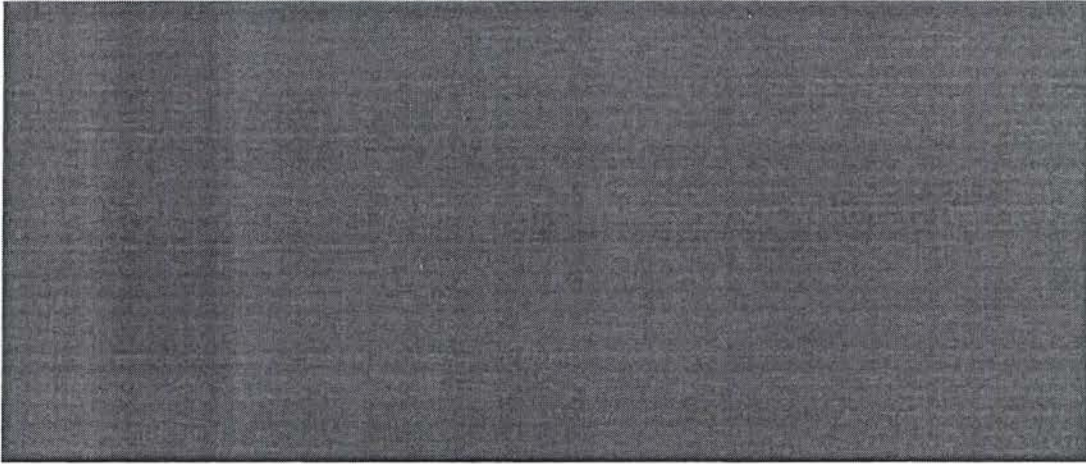
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20-Feb-11	

Exhibit B

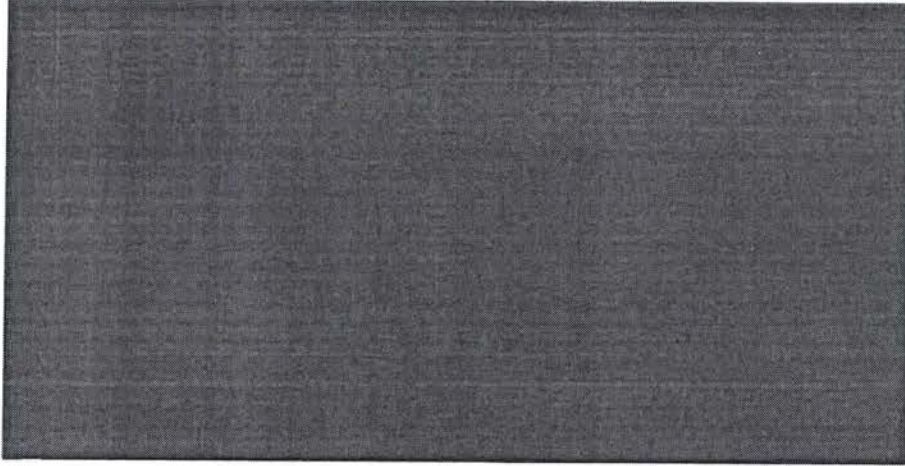
DEF POD 1. Doc 26. CSCI. CONFIDENTIAL. Osceola Annual Capacity Factors.xls

COMPETTITIVELY SENSITIVE CONFIDENTIAL INFORMATION

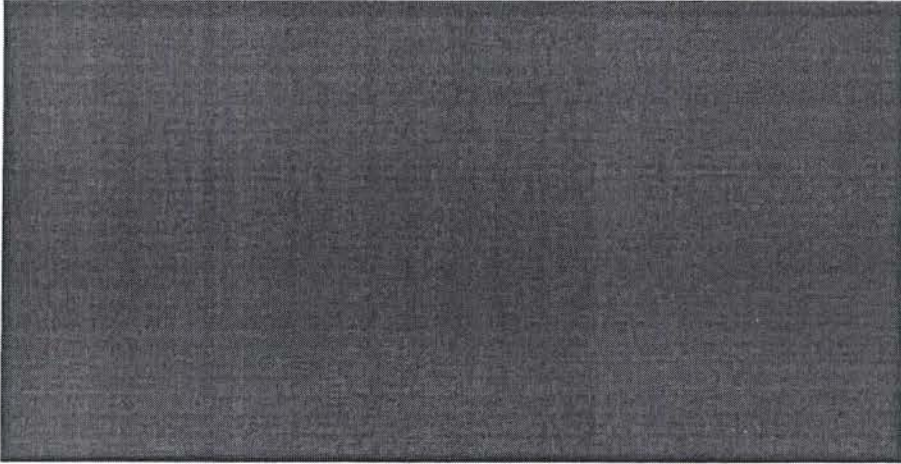
Plant Name Plant State Abbrev Unit Year Sum Total mmBtu Sum Net Generation MWh - Modeled

A large black rectangular redaction box covers the entire data table area, obscuring all information that would otherwise be present in the table.

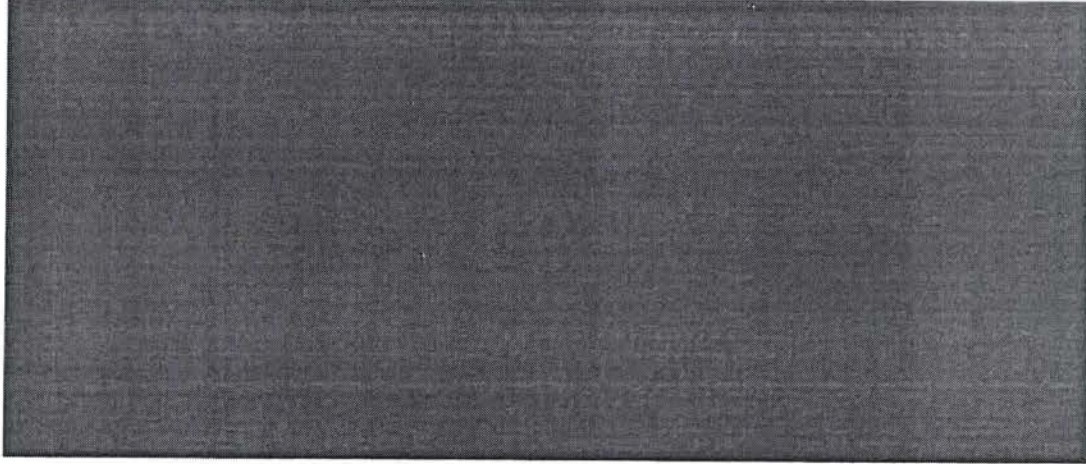
Max Hourly Net Generation MW - Modeled Wtd Avg Net Heat Rate Btu/kW - Modeled



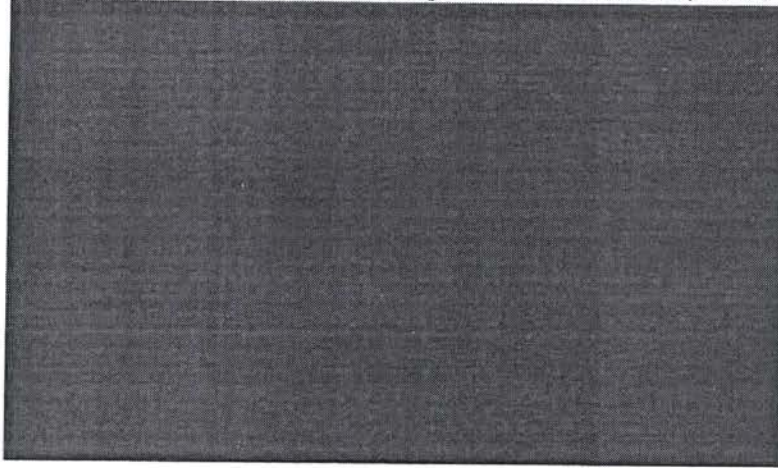
Wtd Avg Gross Heat Rate Btu/kWh - Modeled Wtd Avg Capacity Factor % - Modeled



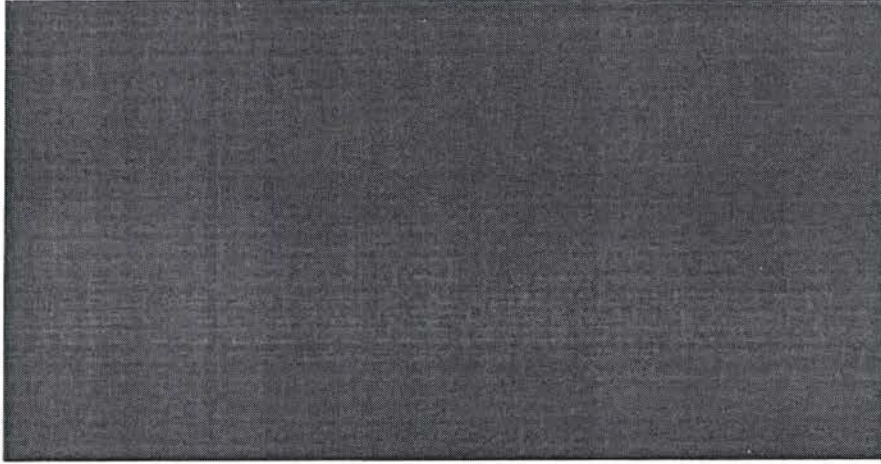
Sum Total Steam Generation (000 lbs) Sum Total CO2 Emissions tons Sum Total SO2 Emissions tons



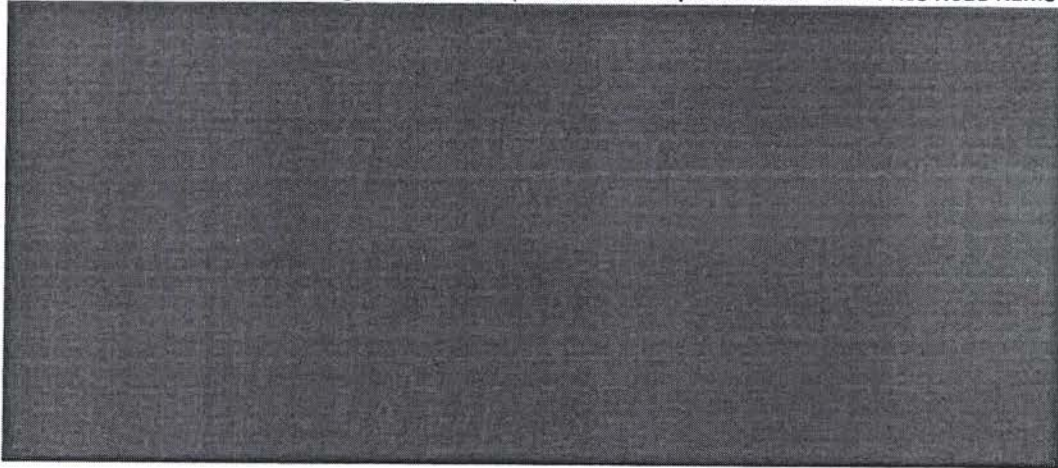
Sum Total NOx Emissions tons Wtd Avg CO2 Emissions Rate lbs/mmBtu



Wtd Avg SO2 Emissions Rate lbs/mmBtu Wtd Avg NOx Emissions Rate lbs/mmBtu



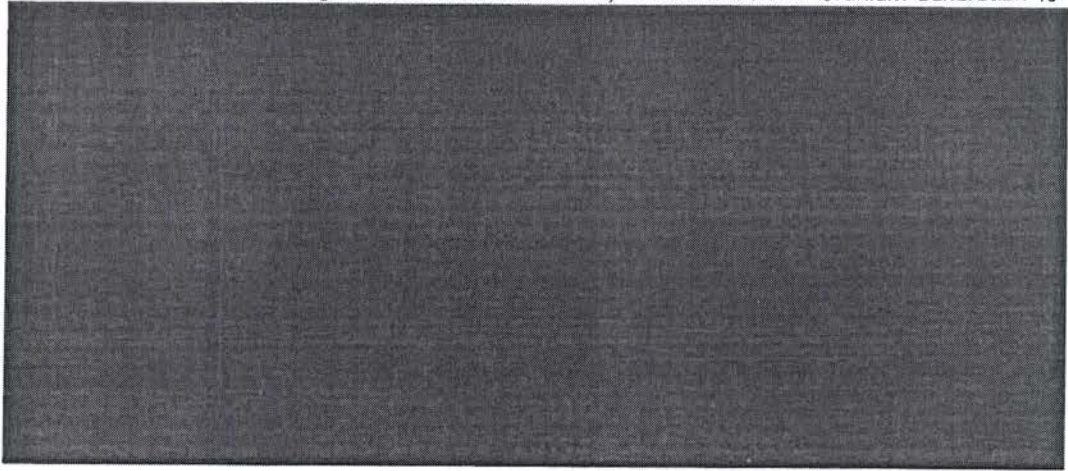
Avg Total Generating Hours Avg # Starts Ventyx Economic Dispatch Factor LMP Price Node Name

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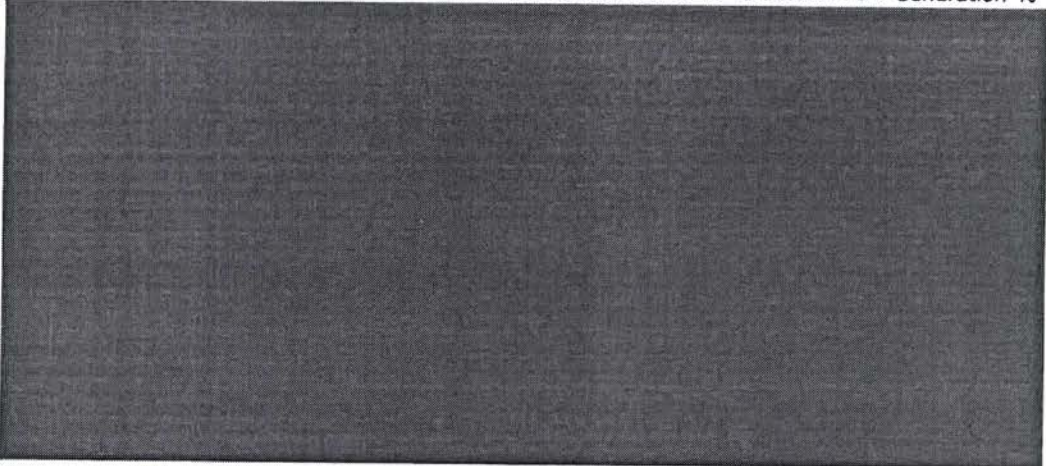
LMP Zonal Name Avg Unit Real Time LMP Price \$/MWh Avg Zonal Price \$/MWh Coal Generation %



Natural Gas Generation % Light Oil Generation % Heavy Oil Generation % Uranium Generation %



Water Generation % Wind Generation % Mixed Fuel Generation % Unknown Fuel Generation %



Record Count

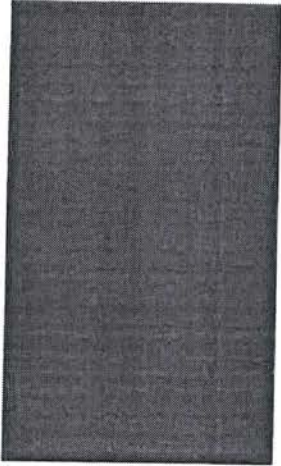


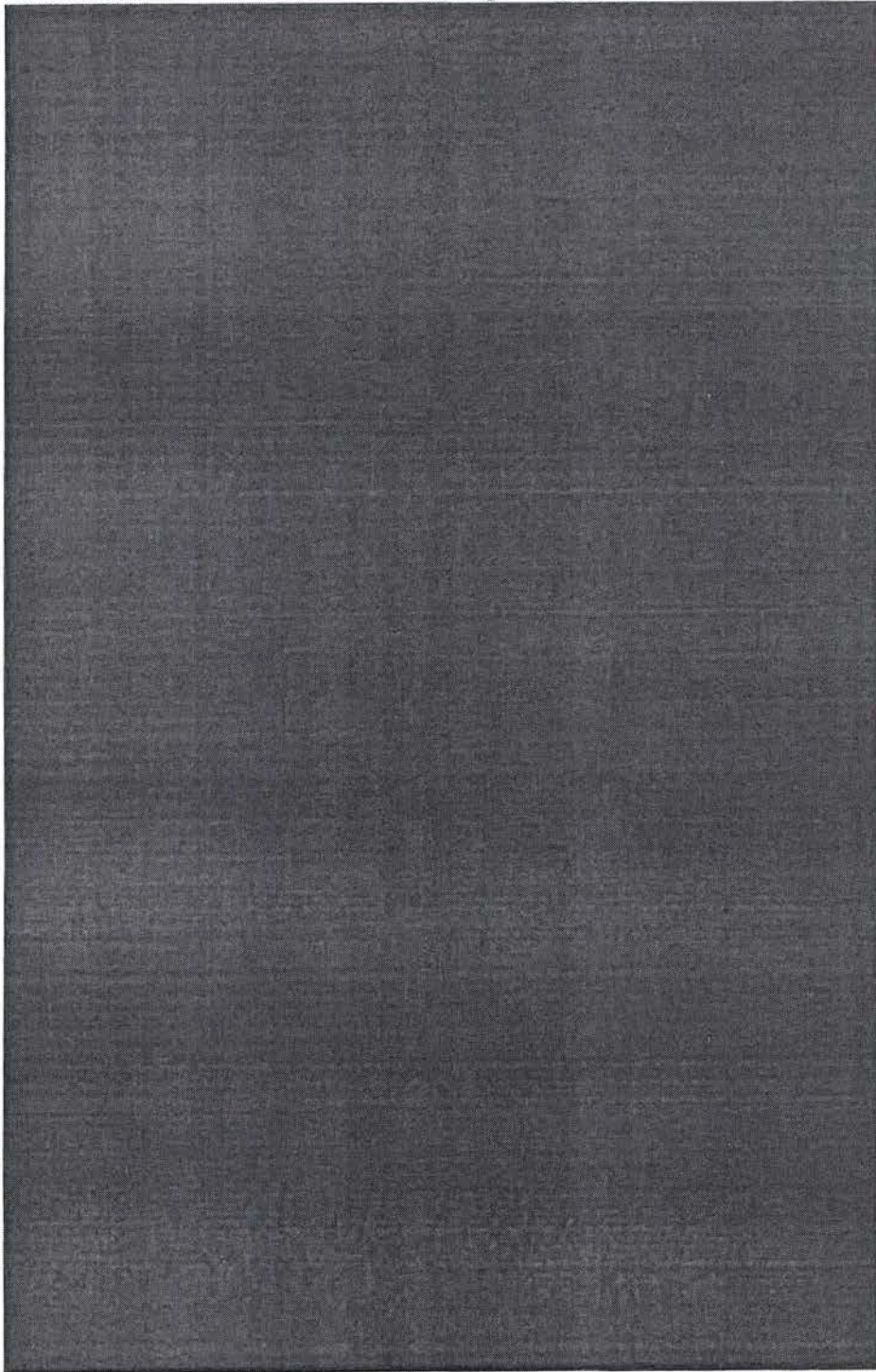
Exhibit B

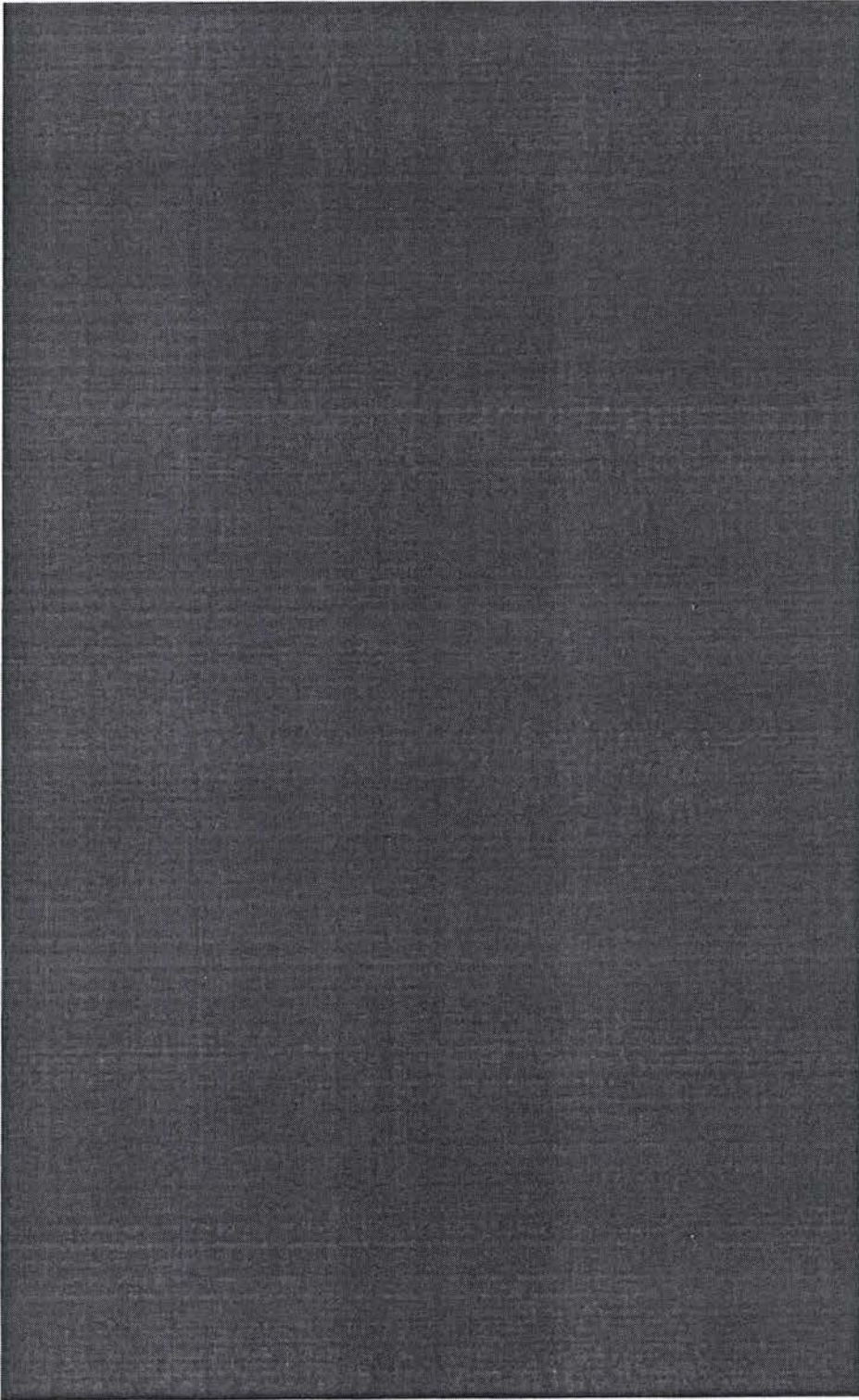
DEF POD 1. Doc 31. CSCI. CONFIDENTIAL. Duke Energy Florida BAA Generation.xls

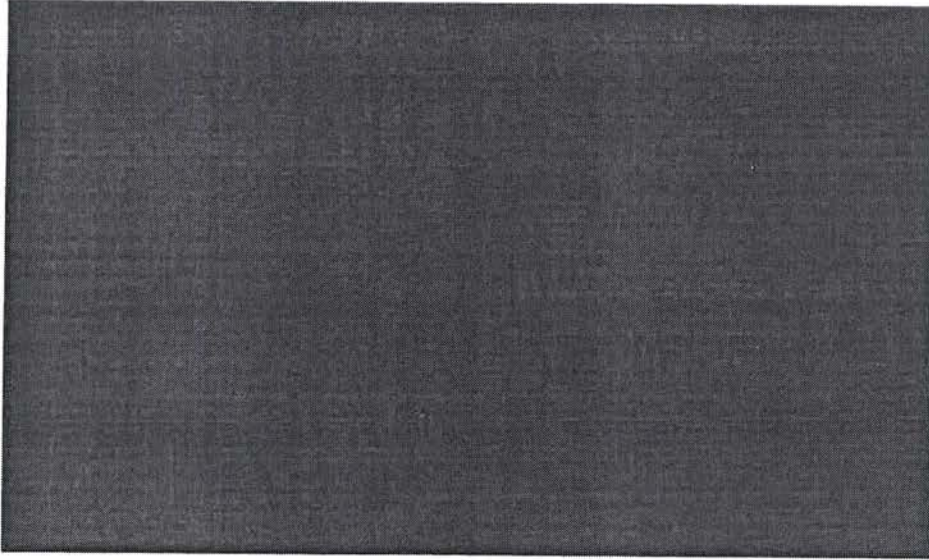
COMPETITIVELY SENSITIVE CONFIDENTIAL INFORMATION

Owner Name

Holding Company Name



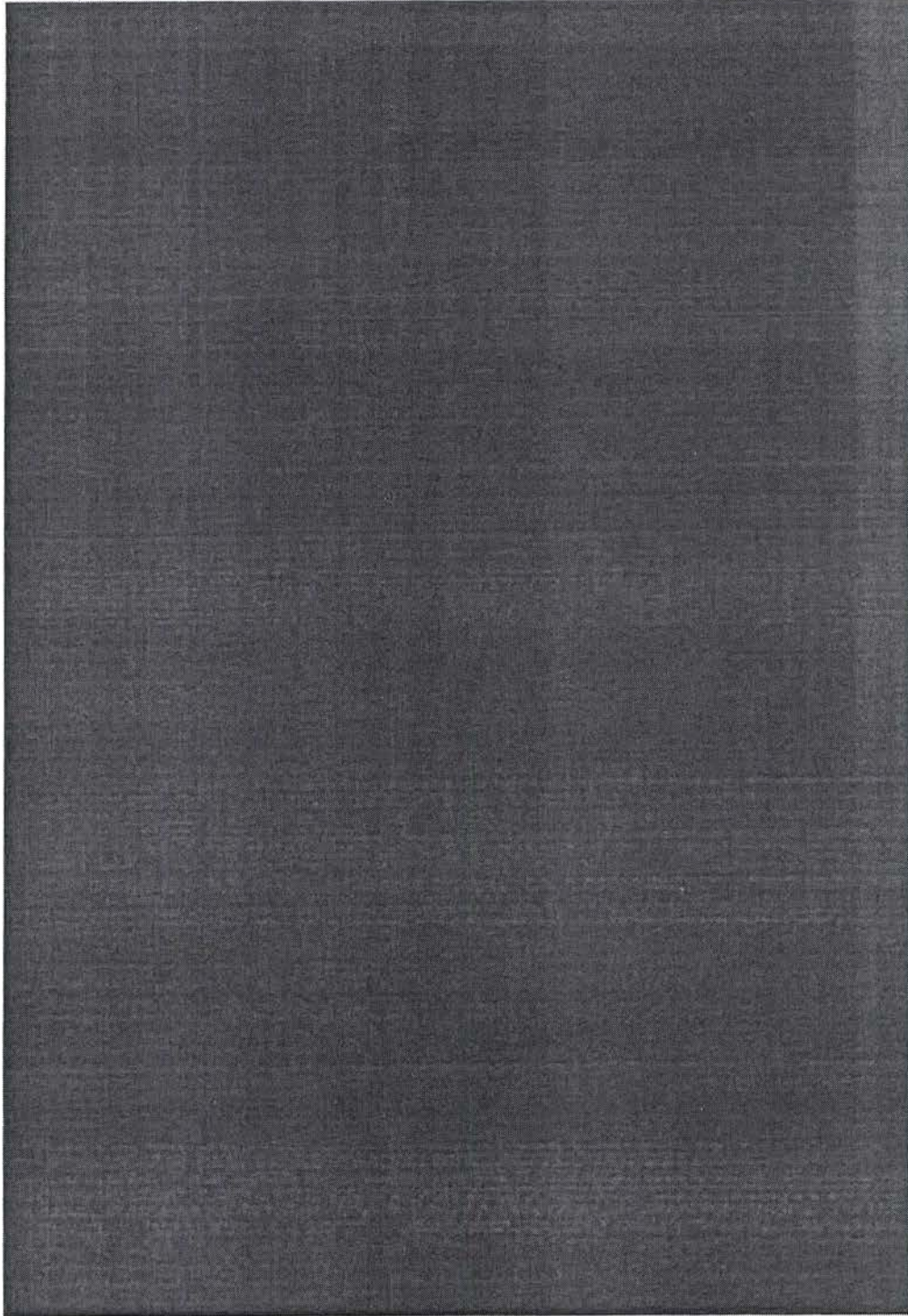


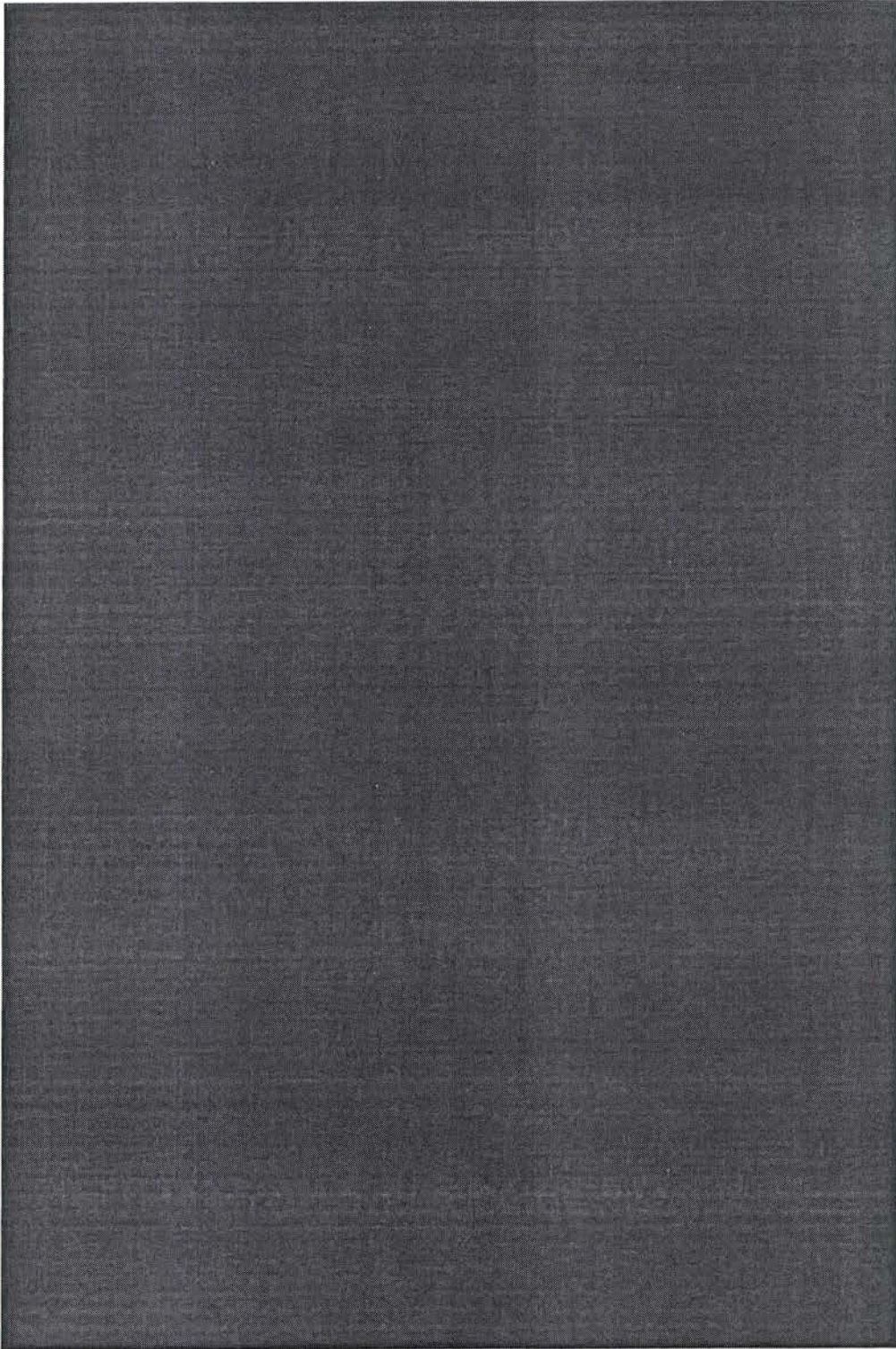


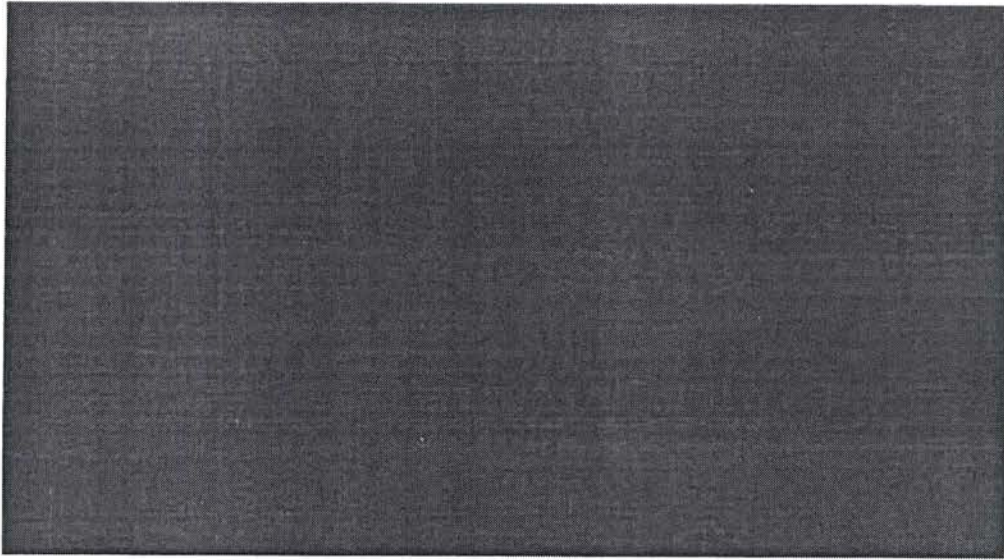
Plant Operator Name

Plant Name

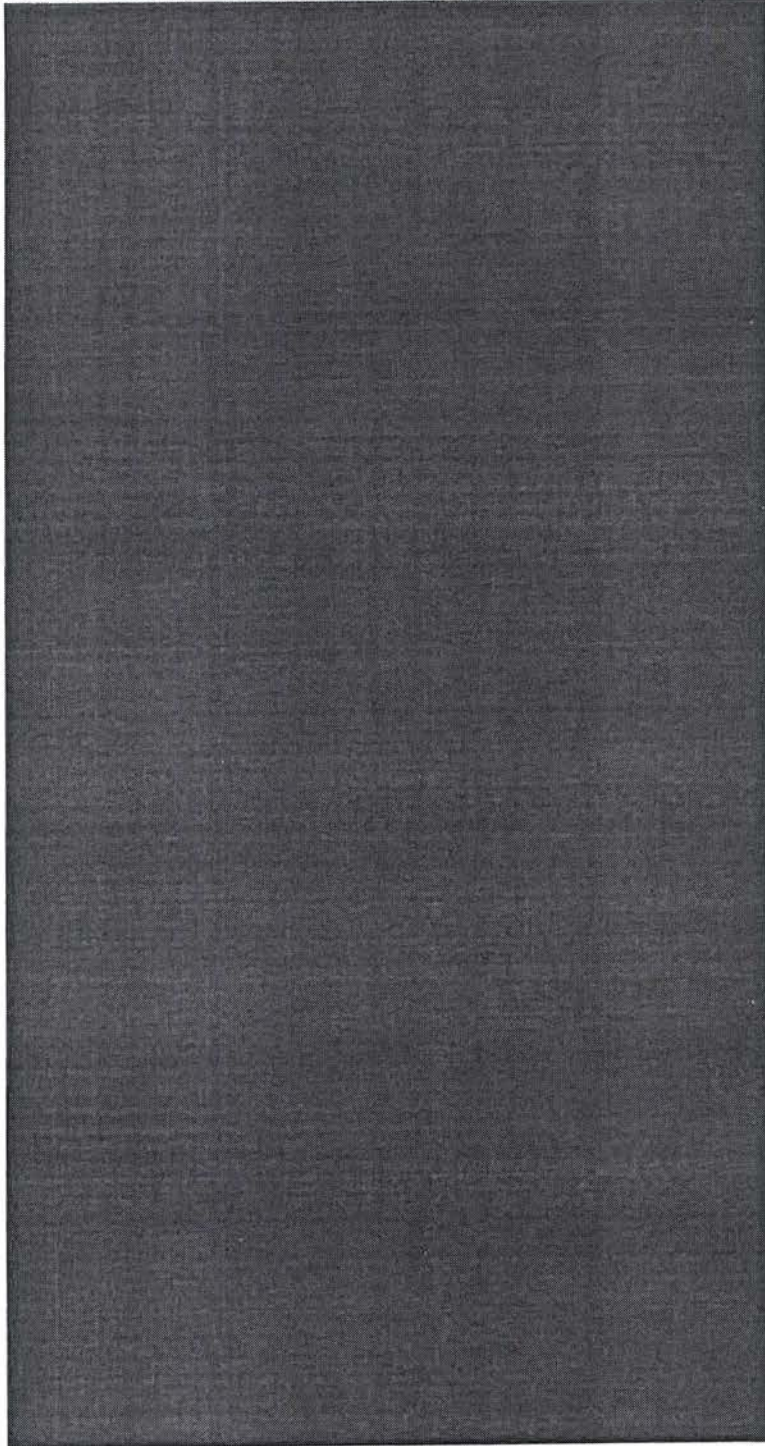
Unit

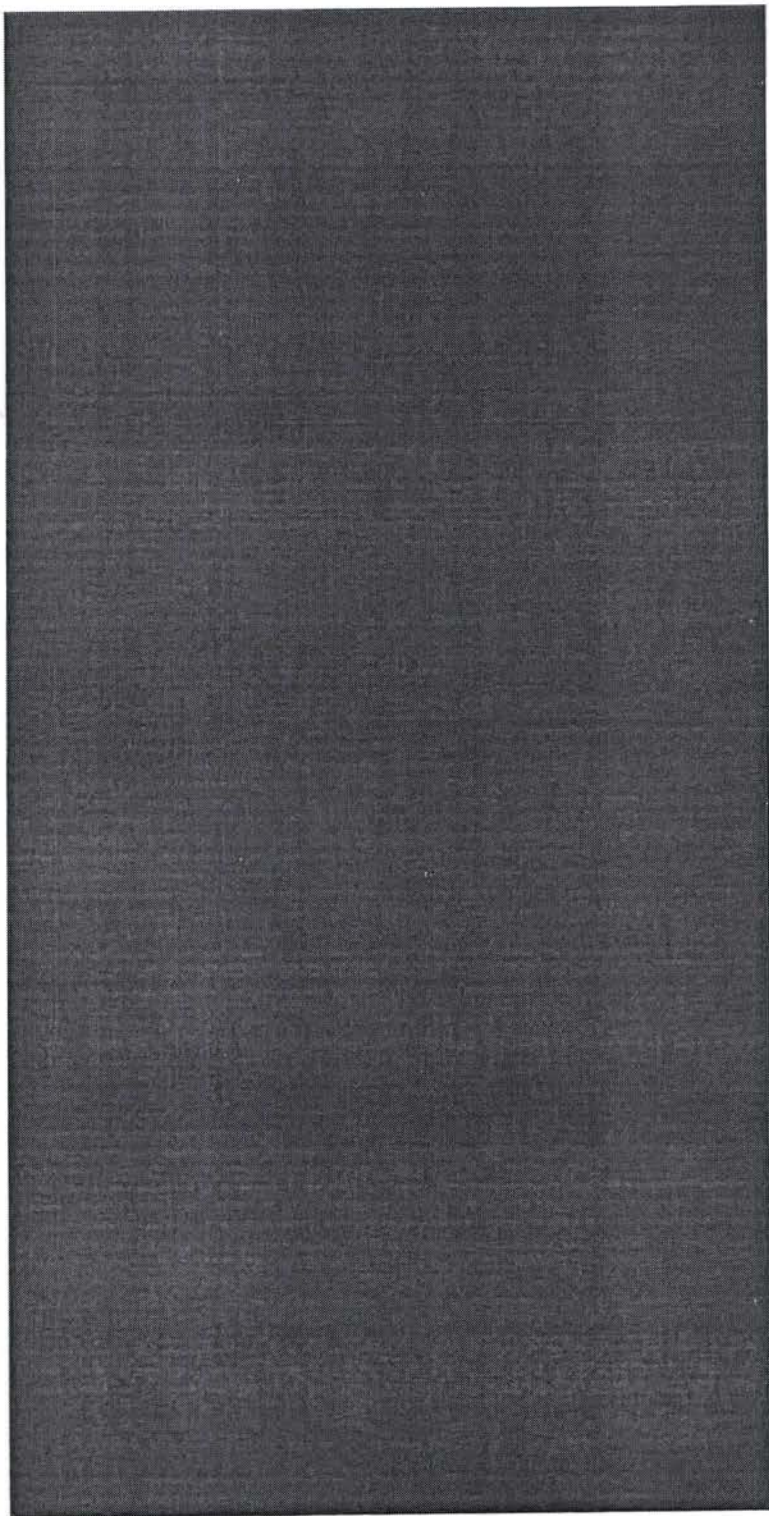
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Percent Owned % Net Summer Capacity MW Net Winter Capacity MW

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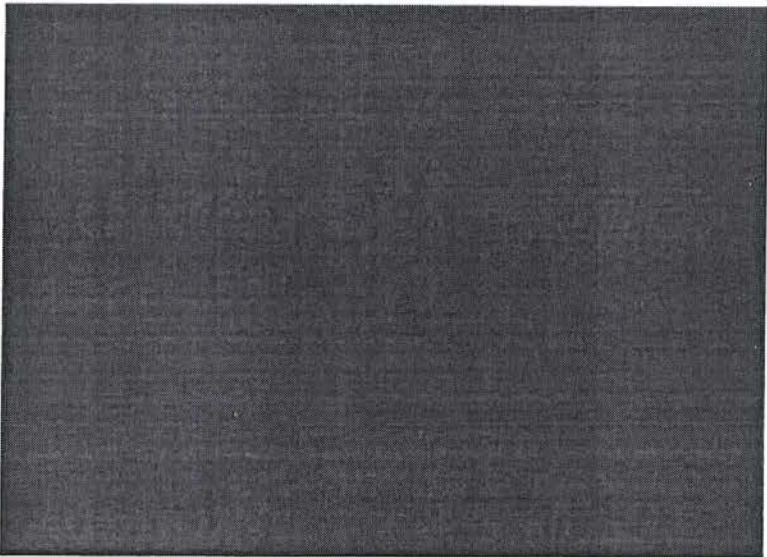


Exhibit B

DEF POD 1. Doc 32. CSCI. CONFIDENTIAL. Ventyx Osceola Data.xls

COMPETITIVELY SENSITIVE CONFIDENTIAL INFORMATION

Owner Name	Holding Company Name	Plant Operator Name	Plant Name	Plant State	Unit
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Percent Owned % Nameplate Capacity MW Net Summer Capacity MW Net Winter Capacity MW



Fully Loaded Tested Heat Rate Btu/kWh - Modeled Fully Loaded Tested Heat Rate Source - Modeled



Average Heat Rate Btu/kWh - Modeled Average Heat Rate Source - Modeled Prime Mover Code



Primary Fuel Code Unit Status Commercial Online Date Grid Connected (Y/N)



Wtd Avg Fuel Costs (12 month average) \$/MWh - Modeled Wtd Avg Variable O & M Costs \$/MWh - Modeled



Wtd Avg Fixed O & M Cost \$/kW-yr - Modeler Record Count

[REDACTED]

[REDACTED]

Exhibit B

DEF POD 1. Doc 42. CSCI. CONFIDENTIAL. Osceola Daily Gas usage 2011 through 2013.xlsb

COMPETITIVELY SENSITIVE, CONFIDENTIAL INFORMATION OSCEOLA DAILY GAS USAGE

Date	MMBtu Consumed	Date Ending	Gas MMBTU Estimates	Date Ending	Gas MMBTU Estimates
1/1/11		1/1/12		1/1/13	
1/2/11		1/2/12		1/2/13	
1/3/11		1/3/12		1/3/13	
1/4/11		1/4/12		1/4/13	
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In re: Petition for Determination
of Need for Citrus County Combined Cycle
Power Plant, by Duke Energy Florida, Inc.

Docket No. 140110-EU

In re: Petition for Determination
of Cost Effective Generation Alternative
to Meet Need Prior to 2018, by Duke
Energy Florida, Inc.

Docket No. 140111-EI

Submitted: August 12, 2013

**EXHIBIT C
TO
NRG ENERGY LP'S
FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Document	Page/Line/Column	Justification
DEF POD 1. Doc 2. Analysis of CSCI.14LGBRA-NRGROG1-28-000001-000008 CONFIDENTIAL Results_Sensitivities_01212014a.xlsx	The entire document is confidential, redacted in its entirety.	§§ 366.093(3)(a), (d), and (e), Fla. Stat.
DEF POD 1. Doc 22. CSCI. CONFIDENTIAL. ERCOT Zone Prices.xlsx	Table data redacted throughout	§§ 366.093(3)(a), (d), and (e), Fla. Stat.
DEF POD 1. Doc 23. CSCI. CONFIDENTIAL. ERCOT-Florida Profit Comparison_CKD.xlsx	Table data redacted throughout	§§ 366.093(3)(a), (d), and (e), Fla. Stat.
DEF POD 1. Doc 24. CSCI. CONFIDENTIAL. fla_prices.xlsx	Table data redacted throughout	§§ 366.093(3)(a), (d), and (e), Fla. Stat.
DEF POD 1. Doc 25. CSCI. CONFIDENTIAL. katy_prices.xlsx	Table data redacted throughout	§§ 366.093(3)(a), (d), and (e), Fla. Stat.
DEF POD 1. Doc 26. CSCI. CONFIDENTIAL. Osceola Annual Capacity Factors.xls	Table data redacted throughout	§§ 366.093(3)(a), (d), and (e), Fla. Stat.

DEF POD 1. Doc 31. CSCI. CONFIDENTIAL. Duke Energy Florida BAA Generation.xls	Table data redacted throughout	§§ 366.093(3)(a), (d), and (e), Fla. Stat.
DEF POD 1. Doc 32. CSCI. CONFIDENTIAL. Ventyx Osceola Data.xls	Table data redacted throughout	§§ 366.093(3)(a), (d), and (e), Fla. Stat.
DEF POD 1. Doc 42. CSCI. CONFIDENTIAL. Osceola Daily Gas usage 2011 through 2013.xlsb	Table data redacted throughout	§§ 366.093(3)(a), (d), and (e), Fla. Stat.

In re: Petition for Determination
of Need for Citrus County Combined Cycle
Power Plant, by Duke Energy Florida, Inc.

Docket No. 140110-EU

In re: Petition for Determination
of Cost Effective Generation Alternative
to Meet Need Prior to 2018, by Duke
Energy Florida, Inc.

Docket No. 140111-EI

Submitted: August 12, 2013

**EXHIBIT D TO NRG ENERGY LP'S
FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION**

AFFIDAVIT OF GORDON D. POLOZOLA

STATE OF LOUISIANA
PARISH OF POINTE COUPEE

Before me, the undersigned authority, personally appeared GORDON D. POLOZOLA, who
being first duly sworn, on oath deposes and states:

1. My name is Gordon D. Polozola. I am over the age of 18 years old and I have
been authorized by NRG Florida GP, LLC on behalf of NRG Florida LP ("NRG") to give this
affidavit. I have personal knowledge of the matters stated herein.


2. I am Regional General Counsel – South Central Region for NRG Energy, Inc., the
parent company of NRG Florida LP. My business address is 112 Telly Street New Roads, LA
70760. I am also Vice-President and Secretary of NRG Florida GP, LLC, the general partner of
NRG Florida LP. In this capacity, I am familiar with the records that are the subject of this First
Request for Confidential Classification.

3. NRG seeks confidential classification for certain documents that it produced in
response to Duke Energy, Florida, Inc.'s ("DEF") First Request for Production of Documents
(No. 2), as specifically described in NRG's First Request for Confidential Classification. The
documents consist of workpapers used and prepared by NRG's witnesses in this proceeding.

4. The confidential workpapers of NRG's witnesses contain competitively sensitive confidential business information that belongs to NRG and which requires confidential classification because it contains information concerning NRG's confidential bids and offers to DEF, proprietary performance and pricing information, as well as proprietary data belonging to third parties which is subject to a contractual obligation to keep confidential and exempt from disclosure. If disclosed, this information would adversely impact NRG's competitive business interests and otherwise harm NRG.

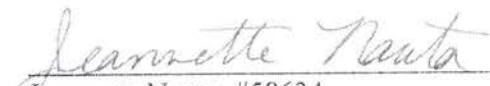
5. The information identified in Exhibit A and Exhibit C to NRG's First Request for Confidential Classification is intended to be and is treated as confidential by NRG and has not been disclosed to the public.

6. This concludes my Affidavit.



GORDON D. POLOZOLA
Vice President and Secretary
NRG Florida GP, LLC
on behalf of NRG Florida LP

SWORN TO AND SUBSCRIBED before me this 12th day of August, 2014, by
GORDON D. POLOZOLA, who is personally known to me, and who did take an oath.



Jeannette Nauta, #58634
Notary Public, State of Louisiana
My Commission expires at death