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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Duke Energy Florida, Inc. for approval of Nuclear Decommissioning Cost Study Docket No. 140057-EI Submitted for Filing: September 3, 2014

DUKE ENERGY FLORIDA, INC.'S NOTICE OF FILING AFFIDAVIT IN SUPPORT OF SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION

Duke Energy Florida, Inc. ("DEF" or the "Company"), gives notice of filing the affidavit

of Ivan L. Wilson in support of DEF's Second Request for Confidential Classification.

Respectfully submitted,

John T. Burnett Deputy General Counsel Dianne M. Triplett Associate General Counsel DUKE ENERGY FLORIDA, INC. Post Office Box 14042 St. Petersburg, FL 33733-4042 Telephone: (727) 820-5587 Facsimile: (727) 820-5519 <u>/s/ Blaise N. Gamba</u> James Michael Walls Florida Bar No. 0706242 Blaise N. Gamba Florida Bar No. 0027942 CARLTON FIELDS JORDEN BURT, P.A. Post Office Box 3239 Tampa, FL 33601-3239 Telephone: (813) 223-7000 Facsimile: (813) 229-4133



CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and U.S. Mail this 3rd day of September, 2014.

<u>/s/ Blaise N. Gamba</u> Attorney

Keino Young Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Phone: (850) 413-6199 Facsimile: (850) 413-6184 Email: kyoung@psc.state.fl.us

Devlin Higgins Public Utility Analyst Division of Economics Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Phone: (850) 413-6433 Facsimile: (850) 413-6434 Email: dhiggins@psc.state.fl.us Paul Lewis, Jr. Duke Energy Florida, Inc. 106 East College Avenue, Ste. 800 Tallahassee, FL 32301-7740 Phone: (850) 222-8738 Facsimile: (850) 222-9768 Email: paul.lewisjr@duke-energy.com

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Duke Energy Florida, Inc. for approval of Nuclear Decommissioning Cost Study Docket No. 140057-EI Submitted for Filing: August 28, 2014

AFFIDAVIT OF IVAN L. WILSON IN SUPPORT OF DUKE ENERGY FLORIDA'S SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

COUNTY OF CITRUS

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

1. My name is Ivan L. Wilson. I am employed by Duke Energy Florida, Inc. ("DEF") and serve as its Manager of Planning, Decommissioning Transition Organization. I am over the age of 18 years old and I have been authorized by DEF to give this affidavit in the above-styled proceeding on DEF's behalf and in support of DEF's Second Request for Confidential Classification. The facts attested to in my affidavit are based upon my personal knowledge.

2. DEF is seeking confidential classification of responsive documents to Florida Public Service Commission Staff's Third Data Request (Nos. 1a-1e). A detailed description of the confidential information at issue is contained in confidential Attachment A to DEF's Second Request for Confidential Classification and is outlined in DEF's Justification Matrix that is attached to DEF's Second Request for Confidential Classification as Attachment C. DEF is requesting confidential classification of these documents because they include financial, confidential and proprietary budget and cost information, and other information related to the Company's competitive business interests, the disclosure of which would compromise DEF's competitive business interests. Specifically, DEF is requesting confidential classification of the Company's budget allocations based on detailed analysis of vendor costs.

4. The Company must be able to assure vendors that sensitive business information, such as the terms of their proposals and contracts and their confidential work product will be kept confidential. Indeed, if third parties were made aware of confidential cost estimates that the Company has with and from other parties, third parties may use this information to DEF's detriment and may offer DEF less competitive contractual terms in future contractual negotiations regarding this project and other projects. Without DEF's measures to maintain the confidentiality of cost information and estimates between DEF and its contractors, the Company's efforts to obtain competitive contracts would be undermined.

5. Therefore, DEF is requesting confidential classification of this information to avoid public disclosure that would violate the confidentiality agreement between DEF and the other parties to the agreement and reveal competitively sensitive costs and business information. DEF has kept confidential and has not publicly disclosed the confidential contract terms and provisions at issue here. Absent such measures, DEF would run the risk that sensitive business and project cost information would be made available to the public.

6. Upon receipt of this confidential information, as with all confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided therein. Such procedures include, but are not limited to, restricting access to the documents and information to only those persons who require it to assist the Company. DEF has not publicly disclosed the confidential cost information; DEF has treated and continues to treat the information contained in the subject request as confidential.

7. This concludes my affidavit.

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Dated this 28 day of August _____, 2014.

Ph (Signature)

Ivan L. Wilson Manager Planning. Decommissioning Transition Organization

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 24thday of August _____, 2014 by Ivan Wilson. He is personally known to me or has produced his driver's license, or his ______ as identification.



(AFFIX NOTARIAL SEAL)

n ms	as identification.
Annemarie	J. Hopper
(Signature)	-
Annemarie J (Printed Name)	T. Hooper
NOTARY PUBLIC	C, STATE OF <u>Florida</u>
April 17, 2017	7
(Commission Expiration Dat	e)
FF 9372	
(Serial Number, If Any)	