

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Storm Protection Plan Cost Recovery  
Clause

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Docket No. 20240010-EI

Dated: May 21, 2024

**NOTICE OF FILING AFFIDAVITS IN SUPPORT OF DEF'S FIRST  
REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida, LLC hereby gives notice of filing the Affidavits of Robert Brong and Robert McCabe in support of DEF's First Request for Extension of Confidential Classification, submitted for filing on May 16, 2024 (document number 03247-2024), regarding its Response to Staff's First Request for Production of Documents (No.1),

Respectfully submitted this 21<sup>st</sup> day of May, 2024.

/s/ Matthew R. Bernier

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Attorneys for Duke Energy Florida, LLC

**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 21<sup>st</sup> day of May, 2024, to all parties of record as indicated below.

/s/ Matthew R. Bernier  
Attorney

<p>Shaw Stiller / Daniel Dose / Jennifer Crawford Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:sstiller@psc.state.fl.us">sstiller@psc.state.fl.us</a> <a href="mailto:ddose@psc.state.fl.us">ddose@psc.state.fl.us</a> <a href="mailto:jcrawfor@psc.state.fl.us">jcrawfor@psc.state.fl.us</a></p> <p>Kenneth Hoffman Florida Power &amp; Light 134 West Jefferson St. Tallahassee, FL 32301-1713 <a href="mailto:ken.hoffman@fpl.com">ken.hoffman@fpl.com</a></p> <p>Christopher T. Wright / Davide Lee Florida Power &amp; Light 700 Universe Boulevard (JB/LAW) Juno Beach FL 33408-0420 <a href="mailto:christopher.wright@fpl.com">christopher.wright@fpl.com</a> <a href="mailto:david.lee@fpl.com">david.lee@fpl.com</a></p> <p>Peter J. Mattheis / Michael K. Lavanga / Joseph R. Briscar Stone Mattheis Xenopoulos &amp; Brew, PC NUCOR 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007 <a href="mailto:pjm@smxblaw.com">pjm@smxblaw.com</a> <a href="mailto:mkl@smxblaw.com">mkl@smxblaw.com</a> <a href="mailto:jrb@smxblaw.com">jrb@smxblaw.com</a></p>	<p>Beth Keating Gunster, Yoakley, &amp; Stewart, P.A. FPUC 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 <a href="mailto:bkeating@gunster.com">bkeating@gunster.com</a></p> <p>Michelle Napier / Phuong Nguyen Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, Florida 33411 <a href="mailto:mnapiier@fpuc.com">mnapiier@fpuc.com</a> <a href="mailto:pnguyen@chpk.com">pnguyen@chpk.com</a></p> <p>Jon C. Moyle Jr. Moyle Law Firm FIPUG 118 North Gadsden St. Tallahassee, FL 32301 <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a> <a href="mailto:mqualls@moylelaw.com">mqualls@moylelaw.com</a></p> <p>James W. Brew / Laura Wynn Baker / Sarah B. Newman Stone Mattheis Xenopoulos &amp; Brew, P.C. PCS Phosphate – White Springs 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:lwb@smxblaw.com">lwb@smxblaw.com</a> <a href="mailto:sbn@smxblaw.com">sbn@smxblaw.com</a></p>	<p>W. Trierweiler / P. Christensen / C. Rehwinkel / M. Wessling / O. Ponce/ A. Watrous Office of Public Counsel 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 <a href="mailto:trierweiler.walt@leg.state.fl.us">trierweiler.walt@leg.state.fl.us</a> <a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a> <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a> <a href="mailto:wessling.mary@leg.state.fl.us">wessling.mary@leg.state.fl.us</a> <a href="mailto:ponce.octavio@leg.state.fl.us">ponce.octavio@leg.state.fl.us</a> <a href="mailto:watrous.austin@leg.state.fl.us">watrous.austin@leg.state.fl.us</a></p> <p>Paula K. Brown Tampa Electric Company Regulatory Affairs P.O. Box 11 Tampa, FL 33601-0111 <a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a></p> <p>J. Wahlen / M. Means / V. Ponder Ausley McMullen Tampa Electric Company P.O. Box 391 Tallahassee, FL 32302 <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a> <a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a> <a href="mailto:vponder@ausley.com">vponder@ausley.com</a></p>
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Storm Protection Plan Cost Recovery  
Clause

Docket No. 20240010-EI

Dated: May 16, 2024

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**AFFIDAVIT OF ROBERT BRONG IN SUPPORT OF  
DUKE ENERGY FLORIDA, LLC'S  
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF SEMINOLE

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

1. My name is Robert Brong. 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 First Request for Extension of Confidential Classification (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Director in the Transmission Resources and Project Management Department. This department is responsible for the execution of capital projects for grid updates across Duke Energy Florida.

3. DEF is seeking an extension of confidential classification for certain information provided in its response to Staff's First Request for Production of Documents (No. 1), specifically documents, bearing bates numbers 20220010-DEF-000001 through 20220010-DEF-000239. There are no changes to the information contained in DEF's confidential Exhibit A, redacted Exhibit B,

and justification matrix C. The referenced Exhibits are on file with the Clerk. DEF is requesting an extension of confidential classification of this information because it contains sensitive business information, the disclosure of which would impair the Company's competitive business interests and ability to contract for goods and services on favorable terms.

4. The confidential information at issue relates to proprietary and confidential internal processes and procedures, costs, and internal policies and guidelines. DEF must ensure that sensitive business information is kept confidential, the disclosure of which would impair the Company's competitive interests and ability to contract on favorable terms.

5. Further, if the information at issue was disclosed, DEF's efforts to obtain contracts that provide economic value to both DEF and its customers could be compromised – harming DEF's ability to prudently operate its business. DEF has not publicly disclosed the information. Without DEF's measures to maintain the confidentiality of this sensitive business information, the Company's efforts to obtain competitive contracts could be undermined and could detrimentally impact DEF's ability to negotiate favorable contracts.

6. 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. 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 at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 20 day of MAY, 2024.

*Robert Brong*

(Signature)

Robert Brong

Director, Transmission Resources and Project Management

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 20 day of MAY, 2024 by Robert Brong. He is personally known to me or has produced his FL DRIVER'S LICENSE driver's license, or his \_\_\_\_\_ as identification.

*Kayla Vega*

(Signature)

KAYLA VEGA

(Printed Name)

NOTARY PUBLIC, STATE OF Florida

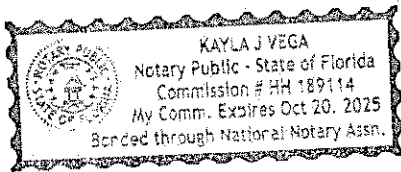
10/20/2025

(Commission Expiration Date)

N/A

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)



**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Storm Protection Plan Cost Recovery  
Clause

Docket No. 20240010-EI

Dated: May 16, 2024

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**AFFIDAVIT OF ROBERT MCCABE IN SUPPORT OF  
DUKE ENERGY FLORIDA, LLC'S  
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Robert McCabe. 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 First Request for Extension of Confidential Classification (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Manager of Project Development and Project Management. I am responsible for managing the project development group for Storm Protection Plan and major project work in addition to providing support for the regulatory filings.

3. DEF is seeking an extension of confidential classification for certain information provided in its response to Staff's First Request for Production of Documents (No. 1), specifically documents, bearing bates numbers 20220010-DEF-000001 through 20220010-DEF-000239. There are no changes to the information contained in DEF's confidential Exhibit A, redacted Exhibit B,

and justification matrix C. The referenced Exhibits are on file with the Clerk. DEF is requesting an extension of confidential classification of this information because it contains sensitive business information, the disclosure of which would impair the Company's competitive business interests and ability to contract for goods and services on favorable terms.

4. The confidential information at issue relates to proprietary and confidential internal processes and procedures, costs, and internal policies and guidelines. DEF must ensure that sensitive business information is kept confidential, the disclosure of which would impair the Company's competitive interests and ability to contract on favorable terms.

5. Further, if the information at issue was disclosed, DEF's efforts to obtain contracts that provide economic value to both DEF and its customers could be compromised – harming DEF's ability to prudently operate its business. DEF has not publicly disclosed the information. Without DEF's measures to maintain the confidentiality of this sensitive business information, the Company's efforts to obtain competitive contracts could be undermined and could detrimentally impact DEF's ability to negotiate favorable contracts.

6. 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. 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 at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 17<sup>th</sup> day of May, 2024.

*Robert McCabe*  
(Signature)

Robert McCabe  
Manager of Project Development and Project  
Management

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 17 day  
of May, 2024 by Robert McCabe. He is personally known to me or has produced his  
FLDX driver's license, or his \_\_\_\_\_ as identification.

*Christina Marino*  
(Signature)

Christina Marino  
(Printed Name)

NOTARY PUBLIC, STATE OF \_\_\_\_\_

Sept. 5, 2026  
(Commission Expiration Date)

HH 308757  
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

