DOCUMENT NO. 04171-2024 FPSC - COMMISSION CLERK

Dianne M. Triplett

DEPUTY GENERAL COUNSEL

May 24, 2024

## VIA OVERNIGHT MAIL

Mr. Adam J. Teitzman, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket 20240025-EI, Petition for Rate Increase by Duke Energy Florida, LLC
Dear Mr. Teitzman,
Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF'), DEF's Request for Confidential Classification for certain information provided in its Responses to OPC's Third Set of Interrogatories (Nos. 63-70) and Third Request for Production of Documents (Nos. 29-32). The filing includes the following:

- DEF's Request for Confidential Classification
- Slip-sheet for confidential Exhibit A
- Redacted Exhibit B (two copies)
- Exhibit C (justification matrix), and
- Exhibit D (affidavits of Brian Lloyd, Reginald Anderson, Hans Jacob, Vanessa Goff \& Ed Scott)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on May 3, 2024, under separate cover.

Thank you for your assistance in this matter. Please feel free to call me at (727) 820-4692 should you have any questions concerning this filing.

Respectfully,
/s/ Dianne M. Triplett
Dianne M. Triplett

DMT/mw
Attachments

## CERTIFICATE OF SERVICE

Docket No. 20240025-EI
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this $24^{\text {th }}$ day of May, 2024, to the following:

$$
\frac{\text { /s/ Dianne M. Triplett }}{\text { Dianne M. Triplett }}
$$

| Jennifer Crawford / Major Thompson / Shaw Stiller Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. <br> Tallahassee, FL 32399-0850 <br> JCrawfor@psc.state.fl.us <br> MThompso@psc.state.fl.us <br> SStiller@psc.state.fl.us discovery-gcl@psc.state.fl.us | Walt Trierweiler / Charles J. Rehwinkel / Mary Wessling / Austin Watrous Office of Public Counsel 111 W. Madison St., Rm 812 Tallahassee, FL 32399 rehwinkel.charles@leg.state.fl.us trierweiler.walt@leg.state.fl.us watrous.austin@leg.state.fl.us wessling.mary@leg.state.fl.us |
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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC for rate increase

DOCKET NO. 20240025-EI

Dated: May 24, 2024

## DUKE ENERGY FLORIDA, LLC'S <br> REQUEST FOR CONFIDENTIAL CLASSIFICATION

Duke Energy Florida, LLC ("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 ("Request") for certain information contained in its Response to OPC's Third Request for Production of Documents (Nos. 29-32) and Third Set of Interrogatories (Nos. 63-70). DEF's Notice of Intent to Request Confidential Classification was filed May 3, 2024. This Request is timely. See Rule 25-22.006(3)(a)1, E.A.C. In support of this Request, DEF states:

1. Documents responsive to OPC's Third Request for Production of Documents, specifically, Questions 29 and 31, and OPC's Third Set of Interrogatories, specifically, Questions 65 and 68, contain "confidential proprietary business information" under Section 366.093(3), F.S.
2. The following exhibits are included with this request:
(a) Sealed Composite Exhibit A is a package containing unredacted copies of all documents for which DEF seeks confidential treatment. Composite Exhibit A was submitted separately in a sealed envelope labeled "CONFIDENTIAL" on May 3, 2024. 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 DEF 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 includes affidavits of Edward L. Scott, Brian M. Lloyd, Hans Jacob, Reginald D. Anderson, and Vanessa Goff, attesting to the confidential nature of the information identified in Exhibit C.
3. As indicated in Exhibits C and D, the information for which DEF requires confidential classification is "proprietary confidential business information" within the meaning of § 366.093(3), F.S. Specifically:
(a) The information at issue in DEF's responses to OPC's Third Request for Production of Documents, Questions 29 and 31, and OPC's Third Set of Interrogatories, Questions 65 and 68 , include pricing information relating to contracts for goods and services. Disclosure of this non-public information could alter contractors' behavior to the detriment of DEF, its customers, and its affiliates. Thus, absent confidential classification, DEF and its affiliates' efforts to contract for goods and services on favorable terms may be impaired.
(b) The information at issue in DEF's responses to OPC's Third Request for Production of Documents, Question 29, and OPC's Third Set of Interrogatories, Question 65, includes internal sensitive business information regarding future projects and capital investments. That information relates to DEF's competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF's ability to compete in the marketplace.
(c) The information at issue in DEF's response to OPC's Third Set of

Interrogatories, Question 68, includes details about the location and nature of future transmission planning projects. Disclosure of that information could pose significant security risks to DEF, its customers, and the transmission grid.
4. The information identified in Exhibits A and C is intended to be and is treated as confidential by DEF. See Exhibit D. Further, that information has not been disclosed to the public. See Exhibit D.
5. It follows that the information identified in Exhibit A and C is proprietary confidential information, which would cause harm to DEF and ratepayers if disclosed and which is exempt from disclosure under the Public Records Act pursuant to § 366.093(3), F.S.
6. Accordingly, 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 be granted.

RESPECTFULLY SUBMITTED this 24th day of May, 2024.
/s/Dianne M. Triplett
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Attorneys for Duke Energy Florida, LLC

## CERTIFICATE OF SERVICE <br> Docket No. 20240025-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 24th day of May, 2024.

## /s/ Dianne M. Triplett Attorney

| Jennifer Crawford / Major Thompson / Shaw Stiller <br> Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. <br> Tallahassee, FL 32399-0850 <br> JCrawfor@psc.state.fl.us <br> MThompso@psc.state.fl.us <br> SStiller@psc.state.fl.us | Walt Trierweiler / Charles J. Rehwinkel / <br> Mary Wessling / Austin Watrous Office of Public Counsel 111 W. Madison St., Rm 812 Tallahassee, FL 32399 rehwinkel.charles@leg.state.fl.us trierweiler.walt@1eg.state.fl.us watrous.austin@leg.state.fl.us wessling.mary@leg.state.fl.us |
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## Exhibit A

## "CONFIDENTIAL"

(filed under separate cover on May 3, 2024)

## Exhibit B

## REDACTED <br> (copy-one)

## REDACTED

DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00016599 THROUGH 20240025-OPCROG3-00016607 ARE REDACTED IN THEIR ENTIRETY

## REDACTED <br> DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00016684 THROUGH 20240025-OPCROG3-00016695 ARE REDACTED IN THEIR ENTIRETY

## REDACTED <br> DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00016741 THROUGH 20240025-OPCROG3-00016752 ARE REDACTED IN THEIR ENTIRETY

# REDACTED <br> DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00016757 through 20240025-OPCROG3-00016789 ARE REDACTED IN THEIR ENTIRETY 

# REDACTED <br> DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00016852 through 20240025-OPCROG3-00017030 ARE REDACTED IN THEIR ENTIRETY 

# REDACTED DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00017033 and 20240025-OPCROG3-00017034 ARE REDACTED IN THEIR ENTIRETY 

## REDACTED

DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00017112 through 00020240025-OPCROG3-00017122 ARE REDACTED IN THEIR ENTIRETY

# REDACTED <br> DOCUMENTS BEARING BATES NUMBER 20240025-OPCROG3-00017791 IS REDACTED IN ITS ENTIRETY 

## Estimate Review Summary Form

## Project Name: <br> Stategic Category

CLEARWATER
Substation Optimization
FL S Coastal Zone
Effort Description:
Effort Description: Clearwater Class 3 Estimate
Effort Description
Additional Notes:

- Cost Estimate is based on Actuals to Date (Sept 2022 thru March 2023) + ETC which ties to the April Forecast submission.
- Contingency is based on ETC data only


Estimate Summary: CLEARWATER

| Sum of Breakdown | Column Labels |  |  |  |  |  | Most Likely \$ | Min \$'s | Max \$'s |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Row Labels | CapEx | Removal | O\&M | Grand Total | Units | UOM | With Contingency | -10\% | 20\% |
| Feeder Hardening |  |  |  |  |  | ile | \$10,964,352 | \$9,867,916 | \$11,841,499 |
| Lateral Hardening OH |  |  |  |  |  | ile | \$8,622,556 | \$7,760,300 | \$9,312,360 |
| Lateral Hardening UG |  |  |  |  |  | HMR | \$443,606 | \$399,245 | \$479,094 |
| SOG: C\&C |  |  |  |  |  | econductor Miles | \$8,453,868 | \$7,608,481 | \$9,130,177 |
| SOG: SEGA |  |  |  |  |  | OS, PAD, Reclosers | \$7,932,900 | \$7,139,610 | \$8,567,532 |
| Planned Pole Replace |  |  |  |  |  | ole | \$1,887,549 | \$1,698,794 | \$2,038,553 |
| Switchgear |  |  |  |  |  | ach | \$767,556 | \$690,800 | \$828,960 |
| Underground Cable Replacement |  |  |  |  |  | eet | \$120,446 | \$108,401 | \$130,081 |
| Transformer |  |  |  |  |  | ransformer | \$0 | \$0 | \$0 |
| Fuse Replacement |  |  |  |  |  | ach | \$2,966,561 | \$2,669,905 | \$3,203,886 |
| Riser/Term Pole Retrofit |  |  |  |  |  | ach | \$3,712,841 | \$3,341,557 | \$4,009,868 |
| Maintain CAP |  |  |  |  |  | - | \$26,000 | \$23,400 | \$28,080 |
| Proj OM Maintain |  |  |  |  |  | - | \$40,000 | \$36,000 | \$43,200 |
| POWER UP O\&M Alloc. |  |  |  |  |  | - | \$0 | \$0 | \$0 |
| Estimate Contingency |  |  |  |  |  | - | \$4,316,057 | \$3,884,451 | \$4,661,341 |
| Grand Total | \$43,485,373 | \$5,785,539 | \$983,378 | \$50,254,290 |  |  | \$50,254,290 | \$45,228,860 | \$54,274,631 |

Please refer to tab "EAC Cashflow Details" for additional details on cashflow.

| Funding Summary |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Substation | PFA <br> Approved Amount |  | Current <br> Forecast EAC |  | Variance to PFA <br> \$ |  | Supplemental PFA amount: | \$ | 47,430,573 |
| Gateway | \$ | 2,823,717 | \$ | 50,254,290 | \$ | 47,430,573 |  |  |  |






Measure Dollar



Project: Sparr Sub<br>Project \#: OC-C-16<br>Need Date: 12/31/21

## Distribution estimates

Install new 795 feeder Install new 336 feeder Double circuit 795
Add second 795 circuit to existing feeder Underbuild feeder on existing transmission Reconductor 336 with 795 feeder
Install new 3 phase 1/0
Relocate existing 795 feeder
Relocate existing 336 feeder
Relocate 3 phase $1 / 0$
Remove 3 phase line
Install Viper recloser
Install hydraulic recloser
Install set of regulators
Install 1200 kvar capacitor
Install 600 amp switch
Recoordination
Install 1000kcmil ug feeder - directional bore Install 1000kcmil ug feeder - open trench Install terminal pole with switches
Install 1/0 1PH ug - directional bore
Install PME switchgear
Install Trayer switchgear
Install Vista switchgear
Install Four Way Enclosure
Subaqueous 1000 kcmil cable
Surveying (\$3,119/mile)
Tree Trimming ( $\$ 9,154 /$ mile)
MOT (\$14,213/mile)

Project total (distribution)

## Substation estimates

New sub - 1-30 with 2 feeders
Add 1-20 mva (assumed redeployed unit)
Add 1-30 mva
Add $1-50 \mathrm{mva}$
Add single breaker
Add feeder position to breaker and a half Add metalclad breaker (3 breakers)
Transmission costs (per mile, not including land rights)
Add neutral reactors
RUDI- (per breaker)
New RUDI Upgrade
Project total (substation)


| Required activities associated with project. | \# of <br> locations |  |  |
| :--- | :--- | :--- | :---: |
| Load balancing - \# of taps to be moved |  |  |  |
| Capacitors to be added (note if RUDI or Non-RUDI Fdr) |  |  |  |
| Capacitors to be relocated (note if RUDI or Non-RUDI Fdr) |  |  |  |
| Coordination (change in fuse size or added devices) |  |  |  |
| Segementation (\# of customers between switches) - \# of new switches <br> needed |  |  |  |
| Mid Pt reclosers to be relocated |  |  |  |
| Protective Coordination Review-Relay |  |  |  |
| Neutral Reactors required? (Max fault current >10kA, or 1 ph>7kA?) |  |  |  |
|  |  |  |  |

## Exhibit B

## REDACTED <br> (copy-two)





| Substation |  | Unit Type 2 | Labor | Material | OHAlloc | Acpt Dsgn vs AsBlt+Eng \& Anscillary TOT |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| XBYU | F2RRPL |  |  |  |  |  |  |
| XBYU | genswgr |  |  |  |  |  |  |
| XBYU | GNSWLF |  |  |  |  |  |  |
| xbyu | RUCSM |  |  |  |  |  |  |
| XBYU | POLRPL |  |  |  |  |  |  |
| XBYU | RPR |  |  |  |  |  |  |
| xbYu | arretro |  |  |  |  |  |  |
| XBYU | SPPFDHD |  |  |  |  |  |  |
| XBYU | SPPLHFR |  |  |  |  |  |  |
| XBYU | SPPLTOH | LHo |  |  |  |  |  |
| XBYU | SPPLTUG |  |  |  |  |  |  |
| xbYu | SPPCRCN | 6 - Reconductor |  |  |  |  | 0\% contingency baked into rate for Tap change, Cap Bank, Switching, Regulator. |
| XBYU | SPPSGAU | ASD, MOS |  |  |  |  |  |



Non-EpC Updates: Update internal rates assumptions for Non-EPC (ST51 \& OAKH)
For SEGA, I Updated all except Padmount
SEGA Padmount only change alloc for Rem/OM; Padmount escalate unit rate 32
C\&C change all for only Reconducto
C\&C non-reconductor only change Rem/OM alloc.; Non-reconductor work l escalated unit cost by $32 \%$
Non-EpC Updates: Update internal rates assumptions for EPC (XBYU)
Assump Tab: update Unit rate column formula to to pick up total only from the Epc Table Assump Tab: update Unit rate
Update the Rem/OM Alloc.

Non-EpC Updates: Update internal rates assumptions for EPC (PASA) Update the Rem/OM Alloc Only
Update SPP material to match this file


SOG C\&C (Miles) $\quad$ Reconductoring Miles (CF *5280) - UOM SOG C\&C (Miles)



Ser Finance advice. Historicillyseengs $15 \%$
Per fee notes Tab




Install new 795 feeder Install new 336 feed
Double circuit 795
Double circuit 795
Add second 795 circuit to existing feeder Underbuild feeder on existing transmission Reconductor 336 with 795 feeder
Install new 3 phase $1 / 0$
Relocate existing 795 feeder
Relocate existing 336 feeder Relocate existing 336
Relocate 3 phase $1 / 0$
Relocate 3 phase line
Remove 3 phase line
Install Viper recloser
Install hydraulic recloser
Install set of regulators
Install 1200 kvar capacitor
Install 1200 kvar capacititer
Install 600 amp switch
Install 1000 kcmil ug feeder - directional bore Install 1000 kcmil ug feeder - open
Install terminal pole with switches
Install $1 / 01 \mathrm{PH}$ ug - directional bor
Install PME switchgea
Install Trayer switchgear
Install Vista switchgear
Install Four Way Enclosure
Instal Four Way Enclosure
Subaqueous 1000 kcmil cable
Surveying ( $\$ 3,119 /$ mile $)$
Tree Triming $(\$ 9,154 /$ mile $)$
Tree Trimming (\$9,154/mile)
MOT (\$14,213/mile)
Project total (distribution
Project total (distribution)

Substation estimates
New sub - $1-30$ with 2 feeders
Add $1-20$ mva (assumed redeployed unit) Add $1-30 \mathrm{mva}$
Add $1-50$ mva
Add $1-50 \mathrm{mva}$
Add single break
Add single breaker
Add feeder position to breaker and a ha
Add metalclad breaker (3 breakers)
Transmission costs (per mile, not including
land rights)
land rights)
Add neutral
Add neutral reactors
RUDI- (per breaker)
New RUDI Upgrade
$\frac{\text { New RUD }}{\text { Project total (substation) }}$
Project total
\$ 6,048,208


| Required activities associated with project. | Number of <br> Locations | Cost <br> Per <br> Location |  |
| :--- | :--- | :--- | :--- |
| Cost |  |  |  |


| Class 3-5 Estimating Tool |
| :--- |
| Funding Project Name: Zephyrhills East Substation <br> Funding Project Number:  <br> Circuit ID(s):  <br> Detail Project:  <br> Detail Project In Service Date:  <br> Operating Unit:  <br> Process Level 5  <br> Process Level 6  |

> | CLASS 3 |  |  |
| :---: | :---: | :---: |
| Estimate Summary - CAPEX |  |  |
| $-\mathbf{1 0 \%}$ | Expected | $20 \%$ |
| $\$ 32,358,619$ | $\$ 35,954,021$ | $\$ 43,144,825$ |

| Main Components | Sub Components | UoM | \# of Units Install | Qty. <br> \# of Units Remove | \# of Units Transfer | Materials | Material + <br> Escalation \% | Install Labor | Install Labor + Supply Chain Esc. \% | Loaders | Engineering/D esign Project Pool |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| SPP SOG - OH Conductors/Equipment - New Install (CNC-REC) |  |  |  |  |  |  |  |  |  |  |  |
| Single Circuit, 3PH 795 AAC PRI \& 336 NEU | (3) 795, Single Conductor, Primary | Linear Feet |  |  |  |  |  |  |  |  |  |
|  | (1) 336 , Single Conductor, Neutral | Linear Feet | - |  |  |  |  |  |  |  |  |
|  | 3PH In-Line 50' 22 Wood Pole @every 100ft. CF | Pole |  |  |  |  |  |  |  |  |  |
|  | 3PH In-Line 50' H1 Concrete Pole @every 100ft. CF (DEFAULT) | Pole | - |  |  |  |  |  |  |  |  |
| Recloser - Electronic | 3PH GW Viper-ST 800A Electronic Controlled 15-27kV | EA |  |  |  |  |  |  |  |  |  |
| Switchgear (includes cord, ground rod) | PME-9/PME-10/PME-11 15KV | EA |  |  |  |  |  |  |  |  |  |
|  | PME-10 Solid Dielectric for Coastal//submersible | EA |  |  |  |  |  |  |  |  |  |
| Motor Operated Switch | (1) MOS with Comms Cabinet | EA |  |  |  |  |  |  |  |  |  |
|  | (2) MOS with Comms Cabinet | EA |  |  |  |  |  |  |  |  |  |
|  | (3) MOS with Comms Cabinet | EA |  |  |  |  |  |  |  |  |  |
| SPP SOG - OH Conductors - Reconductoring (CNC-REC) |  |  |  |  |  |  |  |  |  |  |  |
| Single Circuit, 1PH 1/0 AAC PRI \& NEU | (1) 1/0, Single Conductor, Primary | Linear Feet |  |  |  |  |  |  |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet | - | - |  |  |  |  |  |  |  |
|  | 1PH In-Line 40' C5 Wood Pole @every 100ft. CF | Pole |  |  |  |  |  |  |  |  |  |
|  | 1PH In-Line 40' H1 Concrete Pole @every 100ft. CF (DEFAULT) | Pole | - | - |  |  |  |  |  |  |  |
| Single Circuit, 2PH 1/0 AAC PRI \& NEU | (2) $1 / 0$, Single Conductor, Primary | Linear Feet |  |  |  |  |  |  |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet | - | - |  |  |  |  |  |  |  |
|  | 2PH In-Line 50' C2-3 Wood Pole @every 100ft. CF | Pole |  |  |  |  |  |  |  |  |  |
|  | 2PH In-Line 50' H2 Concrete Pole @every 100ft. CF (DEFAULT) | Pole | - | - |  |  |  |  |  |  |  |
| Single Circuit, 3PH 1/0 AAC PRI \& NEU | (3) $1 / 0$, Single Conductor, Primary | Linear Feet |  |  |  |  |  |  |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet | - | - |  |  |  |  |  |  |  |
|  | 3PH In-Line 50' $22-3$ Wood Pole @every 100ft. CF | Pole |  |  |  |  |  |  |  |  |  |
|  | 3PH In-Line 50' H2 Concrete Pole @every 100ft. CF (DEFAULT) | Pole | - | - |  |  |  |  |  |  |  |
| Single Circuit, 3PH 795 AAC PRI \& 336 NEU | (3) 795, Single Conductor, Primary | Linear Feet |  |  |  |  |  |  |  |  |  |
|  | (1) 336 , Single Conductor, Neutral | Linear Feet | - | - |  |  |  |  |  |  |  |
|  | 3PH In-Line 50' C2 Wood Pole @every 100ft. CF | Pole |  |  |  |  |  |  |  |  |  |
|  | 3PH In-Line 50' H1 Concrete Pole @every 100ft. CF (DEFAULT) | Pole | - | - |  |  |  |  |  |  |  |
| SPP Lateral Hardening - OH Conductors |  |  |  |  |  |  |  |  |  |  |  |
| Single Circuit, 1PH 1/0 AAC PRI \& NEU | (1) 1/0, Single Conductor, Primary | Linear Feet |  |  |  |  |  |  |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet | - | - | - |  |  |  |  |  |  |
|  | 1PH In-Line $40^{\prime} \mathrm{C} 5$ Wood Pole @every 100ft. CF (DEFAULT) | Pole | - | - |  |  |  |  |  |  |  |
|  | 1PH In-Line 40' H1 Concrete Pole @every 100ft. CF | Pole |  |  |  |  |  |  |  |  |  |
| Single Circuit, 2PH 1/0 AAC PRI \& NEU | (2) $1 / 0$, Single Conductor, Primary | Linear Feet |  |  |  |  |  |  |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet | - | - | - |  |  |  |  |  |  |
|  | 2PH In-Line 50' C2-3 Wood Pole @every 100ft. CF (DEFAULT) | Pole | - | - |  |  |  |  |  |  |  |
|  | 2PH In-Line 50' H2 Concrete Pole @every 100ft. CF | Pole |  |  |  |  |  |  |  |  |  |
| Single Circuit, 3PH 1/0 AAC PRI \& NEU | (3) $1 / 0$, Single Conductor, Primary | Linear Feet |  |  |  |  |  |  |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet | - | - |  |  |  |  |  |  |  |
|  | 3 3PH In-Line 50' C2-3 Wood Pole @every 100ft. CF (DEFAULT) | Pole | - | - |  |  |  |  |  |  |  |
|  | 3PH In-Line 50' H2 Concrete Pole @every 100ft. CF | Pole |  |  |  |  |  |  |  |  |  |


| SPP Lateral Hardening - UG Conductors |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| UG Small Cable \& Conduit in Trench | Primary 1/0, 1PH | Linear Feet |  |  |  |
|  | Primary 1/0, 3PH | Linear Feet |  |  |  |
|  | Small Pull Box (w/cover) @every 1,00oft. | EA | - | - |  |
| UG Small Cable \& Conduit via Directional Bore | Primary 1/0, 1PH | Linear Feet |  |  |  |
|  | Primary 1/0, 3PH | Linear Feet |  |  |  |
|  |  | EA | - | - |  |
|  |  | Circuit Feet |  |  |  |
|  |  | EA |  |  |  |
|  |  | A |  |  |  |
| SPP Feeder Hardening - OH Conductors |  |  |  |  |  |
| Single Circuit, 3PH 1/0 AAC PRI \& NEU | (3) $1 / 0$, Single Conductor, Primary | Linear Feet |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet |  | - |  |
|  | 3PH In-Line 50' C2-3 Wood Pole @every 100ft. CF | Pole |  |  |  |
|  | 3PH In-Line 50' H2 Concrete Pole @every 100ft. CF (DEFAULT) | Pole |  | - |  |
| Single Circuit, 3PH 336 AAC PRI \& 1/0 NEU | (3) 336 , Single Conductor, Primary | Linear Feet |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet |  | - | - |
|  | 3PH In-Line 50' C2 Wood Pole @every 100ft. CF | Pole |  |  |  |
|  | 3PH In-Line 50' H1 Concrete Pole @every 100ft. CF (DEFAULT) | Pole |  | - |  |
| Single Circuit, 3PH 795 AAC PRI \& 336 NEU | (3) 795, Single Conductor, Primary | Linear Feet | - |  |  |
|  | (1) 336 , Single Conductor, Neutral | Linear Feet | - | - | - |
|  | 3PH In-Line 50' C2 Wood Pole @every 100ft. CF | Pole |  |  |  |
|  | 3PH In-Line 50' H1 Concrete Pole @every 100ft. CF (DEFAULT) | Pole | - | - |  |
| Double Circuit, 3PH 795 AAC PRI \& 336 NEU | (6) 795, Single Conductor, Primary | Linear Feet |  |  |  |
|  | (1) 336, Single Conductor, Neutral | Linear Feet | - | - |  |
|  | 3PH In-Line 50' C2 Wood Pole @every 87.5t. CF | Pole |  |  |  |
|  | 3PH In-Line 50 ' H1 Concrete Pole @every 87.5ft. CF (DEFAULT) | Pole | - | - |  |
| Underbuild, Single Circuit, 3PH 795 AAC PRI \& 336 NEU | 795, Single Conductor, Primary | Linear Feet |  |  |  |
|  | 336, Single Conductor, Neutral | Linear Feet | - | - | - |
|  | 3PH In-Line 50' C2 Wood Pole @every 200ft. CF | Pole |  |  |  |
|  | 3PH In-Line 50' H1 Concrete Pole @every 200ft. CF (DEFAULT) | Pole | - | - |  |
| SPP Feeder Hardening - UG Conductors |  |  |  |  |  |
| UG Large Cable \& Conduit via Directional Bore | Primary 1000 AL in 6 " PVC Stick Conduit, 1PH | Linear Feet |  |  |  |
|  | Primary 1000 AL in 6" PVC Stick Conduit, 3PH | Linear Feet |  |  |  |
|  | Large Pull Box (w/cover) @every 1,000ft. | EA | - | - |  |
| UG Large Cable ONLY via Directional Bore | Primary 1000, AL Conductor, 1PH | Linear Feet |  |  |  |
|  | Primary 1000, AL Conductor, 3PH | Linear Feet |  |  |  |
|  | Large Pull Box (w/cover) @every 1,000ft. | EA | - | - |  |
|  | NEW 750, 3-2 Conductor, CU Flat Strap | Linear Feet |  |  |  |
|  |  | Circuit Feet |  |  |  |
|  |  | EA |  |  |  |
|  |  | EA |  |  |  |
| Non-SPP - OH Conductors - New Install |  |  |  |  |  |
| Single Circuit, 1PH 1/0 AAC PRI \& NEU | (1) 1/0, Single Conductor, Primary | Linear Feet |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet | - |  |  |
|  | 1PH In-Line 40' C5 Wood Pole @every 200ft. CF | Pole |  |  |  |
|  | 1PH In-Line 40' H1 Concrete Pole @every 200ft. CF (DEFAULT) | Pole | - |  |  |
| Single Circuit, 2PH 1/0 AAC PRI \& NEU | (2) $1 / 0$, Single Conductor, Primary | Linear Feet |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet | - |  |  |
|  | 2PH In-Line 50' C2-3 Wood Pole @every 200ft. CF | Pole |  |  |  |
|  | 2PH In-Line 50' H2 Concrete Pole @every 200ft. CF (DEFAULT) | Pole | - |  |  |
| Single Circuit, 3PH 1/0 AAC PRI \& NEU | (3) $1 / 0$, Single Conductor, Primary | Linear Feet |  |  |  |
|  | (1) $1 / 0$, Single Conductor, Neutral | Linear Feet | - |  |  |
|  | 3PH In-Line 50' C2-3 Wood Pole @every 200ft. CF | Pole |  |  |  |
|  | 3PH In-Line 50' H2 Concrete Pole @every 200ft. CF (DEFAULT) | Pole | - |  |  |
| Single Circuit, 3PH 795 AAC PRI \& 336 NEU | (3) 795, Single Conductor, Primary | Linear Feet | 25,000 |  |  |
|  | (1) 336, Single Conductor, Neutral | Linear Feet | 25,000 |  |  |



|  | 2PH In-line 50' H2 Concrete Pole (w/Rods, Post/Pin Insulator, Arrester, Guy \& Pole |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | 3 3PH In-line 50' H2 Concrete Pole (w/Rods, Post/Pin Insulator, Arrester, Guy \& Pole |  |  |  |  |
|  | 3 3PH In-line 50' 1 1 Concrete Pole (w/Rods, Post/Pin Insulator, Arrester, Guy \& Pole |  |  |  |  |
| Switchgear (includes cord, ground rod) | PME-9/PME-10/PME-11 15KV | EA |  |  |  |
|  | PME-10 Solid Dielectric for Coastal/Submersible | EA |  |  |  |
| Capacitor - Pole Mount | 3PH Capacitor Bank, 600/1200KVAR, SWITCHED | EA | 4 |  |  |
|  | Capacitor Bank Control, CBC-8000 | EA |  |  |  |
| Capacitor - Pad Mount | 3PH Pad Mount, 1200kVAR | EA |  |  |  |
| Regulator | 1PH 328A (w/1PH Bypass Switch) | EA |  |  |  |
|  | 1PH 428A (w/1PH Bypass Switch) | EA |  |  |  |
|  | 3PH 328A (Platform Bank w/3PH Bypass Switch) | EA |  |  |  |
|  | 3PH 428A (Platform Bank w/3PH Bypass Switch) | EA |  |  |  |
|  | Regulator Controller Upgrade (3 units) | EA |  |  |  |
| Cutout/Fuse | 1 PH Non-Loadbreak/Asymmetrical, 100A (auto-populate) | EA | 125 |  |  |
|  | 1PH Non-Loadbreak/Asymmetrical, 100A (adders) | EA |  |  |  |
|  | Tamer Cutout, 100A, 12KAIC, $25 \mathrm{KV}, 125 \mathrm{KV}$ BIL | EA |  |  |  |
| Disconnect Switch | 1 1PH 600A 15kVA Disconnect Switch (auto-populate) | EA | 25 | - |  |
|  | 1PH 600A 15kVA Disconnect Switch (adders) | EA |  |  |  |
|  | 1PH 600A 15kVA Vertical Switch w/Triple-Blade Bypass | EA |  |  |  |
| Recloser - Pole Mount Hydraulic | 1 PH Hydr Recloser, Oil Circuit, $34.5 \mathrm{KV}, 100 \mathrm{~A}$ | EA |  |  |  |
| Recloser - Pole Mount Electronic | 3PH GW Viper-ST 800A Electronic Controlled 15-27kV | EA | 4 |  |  |
|  | Recloser Control Change Outs | EA |  |  |  |
| Recloser - Pad Mount Electronic | 3PH GW Viper-ST 800A Electronic Controlled 15-27kV | EA |  |  |  |
| TripSaver |  | EA |  |  |  |
| Transformer - Pole Mount | 1PH Pole Mount Transformer, 25-50kVA (auto-populate) | EA | 33 | - | - |
|  | 1PH Pole Mount Transformer, 25-50kVA (adders) | EA |  |  |  |
|  | 1 PH Pole Mount Transformer, 100kVA-167kVA | EA |  |  |  |
| Transformer - Pad Mount | 1PH Padmount Transformer (auto-populate) | EA |  |  |  |
|  | 1PH Padmount Transformer (adders) | EA |  |  |  |
|  | 3PH Padmount Transformer | EA |  |  |  |
| Transformer - Pad Mount for Flood Mitigation | 1PH Padmount, 25-50kVA | EA |  |  |  |
|  | 1 PH Padmount, 100-167kVA | EA |  |  |  |
|  | 3 PH Padmount, 300-750kVA | EA |  |  |  |
| Riser | 1PH (3) 10 ' LG 3' WD Riser on Wood/Steel/Concrete Pole | EA |  |  |  |
|  | 3PH (3) 10' LG 5' WD Riser on Wood/Steel/Concrete Pole | EA |  |  |  |
| Riser Pole Retrofit | 1PH (3) 10' LG 3' WD Riser on Wood Pole (w/Cutout, Arrester) | EA |  |  |  |
|  | 3PH (3) 10' LG 5' WD Riser on Wood Pole (w/Cutouts, Arresters) | EA |  |  |  |
| Arrestors | Arrestors Retrofit | EA |  |  |  |
| Equipment Installed/Removed Independently of Conductoing |  |  |  |  |  |
| Pole for Equipment ONLY | 1 1PH In-Line 40' 55 Wood Pole (w/Rods, Post/Pin Insulator, Arrester, Guy \& / Pole |  |  |  |  |
|  | $\frac{2 P H \text { In-Line } 50 ' \mathrm{C} 2-3 \text { Wood Pole (w/Rods, Post/Pin Insulator, Arrester, Guy } 8 \text { Pole }}{3 \text { PH In-Line } 50}$ |  |  |  |  |
|  |  |  |  |  |  |
|  | 3 3PH In-Line $50^{\prime} \mathrm{C} 2$ Wood Pole (w/Rods, Post/Pin Insulator, Arrester, Guy \& / Pole |  |  |  |  |
|  | 1 1PH In-line 40' H1 Concrete Pole (w/Rods, Post/Pin Insulator, Arrester, Guy \& Pole |  |  |  |  |
|  | 2PH In-line 50' H2 Concrete Pole (w/Rods, Post/Pin Insulator, Arrester, Guy \& Pole |  |  |  |  |
|  | 3PH In-line 50' H2 Concrete Pole (w/Rods, Post/Pin Insulator, Arrester, Guy \& Pole |  |  |  |  |
|  | 3PH In-line 50' H1 Concrete Pole (w/Rods, Post/Pin Insulator, Arrester, Guy \& Pole |  |  |  |  |
| Switchgear (includes cord, ground rod) | PME-9/PME-10/PME-11 15KV | EA |  |  |  |
|  | PME-10 Solid Dielectric for Coastal/Submersible | EA |  |  |  |
| Capacitor - Pole Mount | 3PH Capacitor Bank, 600/1200KVAR, SWITCHED | EA |  |  |  |
|  | Capacitor Bank Control, CBC-8000 | EA |  |  |  |
| Capacitor - Pad Mount | 3PH Pad Mount, 1200KVAR | EA |  |  |  |
| Regulator | 1PH 328A (w/1PH Bypass Switch) | EA |  |  |  |
|  | 1PH 428A (w/1PH Bypass Switch) | EA |  |  |  |
|  | 3PH 328A (Platform Bank w/3PH Bypass Switch) | EA |  |  |  |
|  | 3PH 428A (Platform Bank w/3PH Bypass Switch) | EA |  |  |  |
|  | Regulator Controller Upgrade (3 units) | EA |  |  |  |
| Cutout/Fuse | 1 1PH Non-Loadbreak/Asymmetrical, 100A | EA |  |  |  |








REDACTED<br>DOCUMENTS BEARING BATES NUMBERS<br>20240025-OPCPOD3-00015895 through 20240025-OPCPOD3-00015914 and<br>20240025-OPCPOD3-00015918 through 20240025-OPCPOD3-00015920 ARE REDACTED IN THEIR ENTIRETY

## REDACTED

DOCUMENTS BEARING BATES NUMBERS 20240025-OPCPOD3-00013555 through 20240025-OPCPOD3-00015914 and 20240025-OPCPOD3-00015918 through 20240025-OPCPOD3-00015920 and
20240025-OPCPOD3-00015920 16714 through 20240025-OPCPOD3-00017299 ARE REDACTED IN THEIR ENTIRETY

## REDACTED <br> DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00016684 THROUGH 20240025-OPCROG3-00016695 ARE REDACTED IN THEIR ENTIRETY

## REDACTED <br> DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00016741 THROUGH 20240025-OPCROG3-00016752 ARE REDACTED IN THEIR ENTIRETY

# REDACTED <br> DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00016757 through 20240025-OPCROG3-00016789 ARE REDACTED IN THEIR ENTIRETY 

# REDACTED <br> DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00016852 through 20240025-OPCROG3-00017030 ARE REDACTED IN THEIR ENTIRETY 

# REDACTED DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00017033 and 20240025-OPCROG3-00017034 ARE REDACTED IN THEIR ENTIRETY 

## REDACTED

DOCUMENTS BEARING BATES NUMBERS 20240025-OPCROG3-00017112 through 00020240025-OPCROG3-00017122 ARE REDACTED IN THEIR ENTIRETY

# Exhibit C 

## DUKE ENERGY FLORIDA <br> Confidentiality Justification Matrix

| RESPONSE/DOCUMENT | PAGE/LINE | JUSTIFICATION |
| :---: | :---: | :---: |
| DEF's Response to OPC's Third Request for Production of Documents (Nos. 29-32), specifically, Question 29. | Question 29: <br> Documents bearing bates numbers 20240025- <br> OPCPOD3-00015895 <br> through 20240025-OPCPOD3-00015914 and 20240025-OPCPOD3- <br> 00015918 through 20240025-OPCPOD300015920 are confidential in their entirety. | §366.093(3)(e), F.S. <br> The documents in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information. <br> §366.093(3)(d), F.S. <br> The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms. |
| DEF's Response to OPC's Third Request for Production of Documents (Nos. 29-32), specifically, Question 31. | Question 31: <br> Documents bearing bates numbers 20240025- <br> OPCPOD3-00013555 through 20240025-OPCPOD3-00015894, 20240025-OPCPOD300016714 through 20240025-OPCPOD300017299, 20240025-OPCPOD3-00013383 through 20240025-OPCPOD3-00013399, and 20240025-OPCPOD300015921 through 20240025-OPCPOD3- | §366.093(3)(d), F.S. <br> The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms. |


|  | 00016713 are confidential in their entirety. |  |
| :---: | :---: | :---: |
| DEF's Response to OPC's Third Set of Interrogatories (Nos. 63-70), specifically, Question 65. | Question 65: <br> Documents bearing bates numbers 20240025- <br> OPCROG3-00016599 <br> through 20240025- <br> OPCROG3-00016607, <br> 20240025-OPCROG3- <br> 00016679 through 20240025-OPCROG300016695, 20240025- <br> OPCROG3-00016741 <br> through 20240025- <br> OPCROG3-00016755, 20240025-OPCROG300016757 through 20240025-OPCROG300016792, 20240025-OPCROG3-00016852 through 20240025-OPCROG3-00017032, 20240025-OPCROG30001712 through 20240025-OPCROG3-00017132, 20240025-OPCROG300017647 through 20240025-OPCROG300017649, 20240025-OPCROG3-00017651 through 20240025-OPCROG3-00017654, 20240025-OPCROG300017710 through 20240025-OPCROG3001722, 20240025-OPCROG3-00017783 through 20240025-OPCROG3-00017785, 20240025-OPCROG300016600 through 20240025-OPCROG300016602, 20240025-OPCROG3-00016603 | §366.093(3)(e), F.S. <br> The documents in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information. <br> §366.093(3)(d), F.S. <br> The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms. |


|  | through 20240025- <br> OPCROG3-00016607, and <br> 20240025-OPCROG3- <br> 00016599 are confidential in <br> their entirety. |  |
| :--- | :--- | :--- |
| DEF's Response to OPC's Third Set <br> of Interrogatories (Nos. 63-70), <br> specifically, Question 68. | Question 68: <br> The document bearing bates <br> number 20240025- <br> OPCROG3-00017791 is <br> confidential in its entirety. | §366.093(3)(d), F.S. <br> The document in question <br> contains confidential <br> information, the <br> disclosure of which <br> would impair DEF's <br> efforts to contract for <br> goods or services on <br> favorable terms. |
|  |  | §366.093(3)(c), F.S. <br> The document in question <br> contains confidential <br> security measures, <br> systems, or procedures. |

## Exhibit D

## AFFIDAVITS OF EDWARD L. SCOTT, BRIAN M. LLOYD, HANS JACOB, REGINALD D. ANDERSON, AND VANESSA GOFF

# REDACTED <br> DOCUMENTS BEARING BATES NUMBER 20240025-OPCROG3-00017791 IS REDACTED IN ITS ENTIRETY 

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC for rate increase

DOCKET NO. 20240025-EI

Dated: May 24, 2024

# AFFIDAVIT OF EDWARD L. SCOTT IN SUPPORT OF DUKE ENERGY FLORIDA, LLC'S <br> REQUEST FOR CONFIDENTIAL CLASSIFICATION 

## STATE OF FLORIDA

## COUNTY OF PINELLAS

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

1. My name is Edward L. Scott. 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 "Request"). The facts attested to in my affidavit are based upon my personal knowledge.
2. I am employed by DEF as General Manager of System Operations, Florida.
3. As General Manager of System Operations, I am responsible for the safe, reliable, economic, and regulatory compliant operation of the DEF power system. This is done by overseeing the real time electric system operations of DEF, including generation dispatch,
transmission reliability, and transmission service transactions. I also serve as Vice Chair on the Florida Reliability Coordinating Council's ("FRCC") Operating Committee.
4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Third Request for Production of Documents, Question 31 (Transmission), and Third Set of Interrogatories, Question 68. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.
5. Documents produced in response to OPC's Third Request for Production of Documents, Question 31 (Transmission), and Third Set of Interrogatories, Question 68, contain confidential information. Specifically, these documents contain pricing information relating to contracts for goods and services (along with other terms of such contracts). Disclosure of this nonpublic information could alter contractors' behavior to the detriment of DEF, its customers, and its affiliates. Thus, absent confidential classification, DEF's efforts to contract for goods and services on favorable terms may be impaired. In addition, the documents in question contain details about the location and nature of future transmission planning projects. Disclosure of that information could pose significant security risks to DEF, its customers, and the transmission grid.
6. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.
7. This concludes my affidavit.

Further affiant sayeth not.
Dated the $\qquad$ day of $\qquad$ , 2024.
(Signature)
Edward L. Scott
General Manager, System Operations
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this $\qquad$ day of $\qquad$ , 2024 by Edward L. Scott. He is personally known to me or has produced his driver's license, or his $\qquad$ as identification.
(AFFIX NOTARIAL SEAL)
(Signature)
(Printed Name)
NOTARY PUBLIC, STATE OF $\qquad$
(Commission Expiration Date)
(Serial Number, If Any)

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC for rate increase

DOCKET NO. 20240025-EI

Dated: May 24, 2024

# AFFIDAVIT OF VANESSA GOFF IN SUPPORT OF DUKE ENERGY FLORIDA, LLC'S <br> REQUEST FOR CONFIDENTIAL CLASSIFICATION 

## STATE OF NORTH CAROLINA

## COUNTY OF MECKLENBURG

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

1. My name is Vanessa Goff. 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 "Request"). The facts attested to in my affidavit are based upon my personal knowledge.
2. I am employed by Duke Energy Corporation as Director of Renewables Business Development.
3. As Director of Renewables Development, I am responsible for the development of new solar facilities in Florida on behalf of DEF. I lead a team that conducts solar development
activities, including project siting, land acquisition, resource assessment, permitting, obtaining interconnection rights, project layout and design, arranging contracts for engineering, procurement, and construction ("EPC") services, as well as originating, structuring, and executing transactions to acquire rights to existing solar development projects.
4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Third Request for Production of Documents, Question 29 (Solar), and Third Set of Interrogatories, Question 65 (Solar). A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.
5. Documents produced in response to OPC's Third Request for Production of Documents, Question 29 (Solar), and Third Set of Interrogatories, Question 65 (Solar), contain confidential information. Specifically, those documents contain the terms of contracts for goods and services. Disclosure of this non-public information could alter contractors' behavior to the detriment of DEF and its customers. Thus, absent confidential classification, DEF's efforts to contract for goods and services on favorable terms may be impaired.
6. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.
7. This concludes my affidavit.

Further affiant sayeth not.
Dated the $\qquad$ day of $\qquad$ , 2024.

(Signature)<br>Vanessa Goff<br>Director, Renewables Business Development<br>Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this $\qquad$ day of $\qquad$ , 2024 by Vanessa Goff. She is personally known to me or has produced her driver's license, or her $\qquad$ as identification.
(Signature)
(AFFIX NOTARIAL SEAL)
(Printed Name)
NOTARY PUBLIC, STATE OF $\qquad$
(Commission Expiration Date)
(Serial Number, If Any)

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC for rate increase

DOCKET NO. 20240025-EI

Dated: May 24, 2024

# AFFIDAVIT OF BRIAN M. LLOYD IN SUPPORT OF DUKE ENERGY FLORIDA, LLC'S <br> REQUEST FOR CONFIDENTIAL CLASSIFICATION 

STATE OF FLORIDA
COUNTY OF PINELLAS
BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Brian M. Lloyd, who being first duly sworn, on oath deposes and says that:

1. My name is Brian M. Lloyd. 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 "Request"). The facts attested to in my affidavit are based upon my personal knowledge.
2. I am employed by DEF as General Manager, Florida Major Projects.
3. As General Manager, my duties and responsibilities include planning for grid upgrades, system planning, and overall Distribution asset management strategy across DEF, as well as the Project Management for executing the work identified. Additionally, I manage
organizations that execute the developer interactions and engineer large residential developments across the DEF territory.
4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Third Set of Interrogatories, Question 65 (Distribution). A detailed description of the confidential information at issue is contained in Exhibit A to DEF's Request and is outlined in DEF's Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.
5. Documents produced in response to OPC's Third Set of Interrogatories, Question 65 (Distribution), contain confidential information. Specifically, those documents contain pricing information relating to contracts for goods and services. Disclosure of this non-public information could alter contractors' behavior to the detriment of DEF, its customers, and its affiliates. Thus, absent confidential classification, DEF and its affiliates' efforts to contract for goods and services on favorable terms may be impaired. In addition, the documents in question contain internal sensitive business information regarding future projects and capital investments. That information relates to DEF's competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF's ability to compete in the marketplace.
6. Upon receipt of 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. 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 24 day of MAY , 2024.


THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 24 day of Hay , 2024 by Brian M. Lloyd. He is personally known to me or has produced her Fl-DhTC driver's license, or his as identification.

(Signature)


(Commission Expiration Date)


## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC for rate increase

DOCKET NO. 20240025-EI

Dated: May 24, 2024

# AFFIDAVIT OF HANS JACOB IN SUPPORT OF DUKE ENERGY FLORIDA, LLC'S <br> REQUEST FOR CONFIDENTIAL CLASSIFICATION 

STATE OF FLORIDA
COUNTY OF PINELLAS
BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Hans Jacob, who being first duly sworn, on oath deposes and says that:

1. My name is Hans Jacob. 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 "Request"). The facts attested to in my affidavit are based upon my personal knowledge.
2. I am employed by Duke Energy Corporation as Director of Renewable Business Development.
3. As a Director of Renewable Business Development, I am responsible for the development of battery energy storage systems ("BESS") projects in Florida on behalf of Duke

Energy Florida, LLC ("DEF" or the "Company"). I lead a team of project developers responsible for the initiation and deployment of regulated battery energy storage and microgrid systems.
4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Third Request for Production of Documents, Question 31 (Energy Storage), and Third Set of Interrogatories, Question 65 (Energy Storage). A detailed description of the confidential information at issue is contained in Exhibit A to DEF's Request and is outlined in DEF's Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.
5. Documents produced in response to OPC's Third Request for Production of Documents, Question 31 (Energy Storage), and Third Set of Interrogatories, Question 65 (Energy Storage), contain confidential information. Specifically, these documents contain pricing information relating to contracts for goods and services (along with other terms of such contracts). Disclosure of this non-public information could alter contractors' behavior to the detriment of DEF, its customers, and its affiliates. Thus, absent confidential classification, DEF's efforts to contract for goods and services on favorable terms may be impaired.
6. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.
7. This concludes my affidavit.

Further affiant sayeth not.

Dated the $\qquad$ day of $\qquad$ , 2024.
(Signature)
Hans Jacob
Director, Renewable Business Development
Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this $\qquad$ day of $\qquad$ , 2024 by Hans Jacob. He is personally known to me or has produced his
$\qquad$ driver's license, or his $\qquad$ as identification.
(Signature)
(AFFIX NOTARIAL SEAL)
(Printed Name)
NOTARY PUBLIC, STATE OF $\qquad$
(Commission Expiration Date)
(Serial Number, If Any)

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC for rate increase

DOCKET NO. 20240025-EI

Dated: May 24, 2024

# AFFIDAVIT OF REGINALD D. ANDERSON IN SUPPORT OF DUKE ENERGY FLORIDA, LLC'S REQUEST FOR CONFIDENTIAL CLASSIFICATION 

## STATE OF FLORIDA

## COUNTY OF PINELLAS

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

1. My name is Reginald D. Anderson. 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 "Request"). The facts attested to in my affidavit are based upon my personal knowledge.
2. I am employed by DEF as Vice President, Power Generation.
3. As Vice President of DEF's Power Generation organization, I am responsible for providing overall leadership and strategic and tactical planning over employees in DEF's Power Generation organization. In this role, I oversee generation projects, major maintenance programs,
outage and project management, fleet retirement strategy, and workforce planning (including departmental staffing and long-term strategies such as organizational alignment, design, retention, and inclusion). I am responsible for billions of dollars in assets including capital and operating and maintenance ("O\&M") budgets, and I lead the development of regional succession planning.
4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Third Request for Production of Documents, Question 29 (Generation). A detailed description of the confidential information at issue is contained in Exhibit A to DEF's Request and is outlined in DEF's Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.
5. Documents produced in response to OPC's Third Request for Production of Documents, Question 29 (Generation), contain confidential information. Specifically, those documents contain pricing information relating to contracts for goods and services. Disclosure of this non-public information could alter contractors' behavior to the detriment of DEF , its customers, and its affiliates. Thus, absent confidential classification, DEF and its affiliates' efforts to contract for goods and services on favorable terms may be impaired. In addition, the documents in question contain internal sensitive business information regarding future projects and capital investments. That information relates to DEF's competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF's ability to compete in the marketplace.
6. Upon receipt of 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 DEF. At no time
since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.
7. This concludes my affidavit.

Further affiant sayeth not.
Dated the $\qquad$ day of $\qquad$ , 2024.
(Signature)
Reginald D. Anderson
Vice President, Power Generation
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this $\qquad$ day of $\qquad$ , 2024 by Reginald D. Anderson. He is personally known to me or has produced his $\qquad$ driver's license, or his $\qquad$ as identification.

## (Signature)

(AFFIX NOTARIAL SEAL)
(Printed Name)
NOTARY PUBLIC, STATE OF
(Commission Expiration Date)
(Serial Number, If Any)

