



Dianne M. Triplett  
DEPUTY GENERAL COUNSEL

June 3, 2024

**VIA ELECTRONIC 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 Response to OPC's Eighth Set of Interrogatories (Nos. 211-221) and Eighth Request for Production of Documents (Nos. 78-86). 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 Rebekah Buck and Vanessa Goff)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on May 13, 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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20240025-EI

Dated: June 3, 2024

**DUKE ENERGY FLORIDA, LLC'S  
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 Eighth Request for Production of Documents (Nos. 78-86) and Eighth Set of Interrogatories (Nos. 211-221). DEF’s Notice of Intent to Request Confidential Classification was filed May 13, 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 Eighth Request for Production of Documents, specifically, Question 83, and OPC’s Eighth Set of Interrogatories, specifically, Questions 211 and 221, 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 13, 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 Rebekah E. Buck 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 response to OPC’s Eighth Request for Production of Documents, Question 83, and Eighth Set of Interrogatories, Question 221, includes 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 solar 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.

(b) The information at issue in DEF’s responses to OPC’s Eighth Set of Interrogatories, Question 211, includes basis data calculations underlying costs allocated to DEF by its affiliates (and from DEF to its affiliates). This information is proprietary, internal sensitive

business information. Thus, it 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.

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 Exhibits 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 3rd of June, 2024.

/s/Dianne M. Triplett

**DIANNE TRIPLETT**

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Attorneys for Duke Energy Florida, LLC

**CERTIFICATE OF SERVICE**  
**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 3rd day of June, 2024.

*/s/ Dianne M. Triplett*  
Attorney

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# Exhibit A

**“CONFIDENTIAL”**

**(filed under separate cover on May 13, 2024)**

# **Exhibit B**

**REDACTED**

**(copy-one)**



REDACTED

DOCUMENTS BEARING BATES NUMBERS

20240025-OPCROG8-00018672 THROUGH 20240025-OPCROG8-00018954

ARE REDACTED IN ITS ENTIRETY

**REDACTED**  
**DOCUMENT BEARING BATES NUMBER 20240025-**  
**OPCROG8-00018994**  
**IS REDACTED IN ITS ENTIRETY**

**REDACTED**  
**DOCUMENTS BEARING BATES NUMBER 20240025-**  
**OPCPOD8-00018277 THROUGH 20240025-OPCPOD8-**  
**00018352**  
**ARE REDACTED IN THEIR ENTIRETY**

# **Exhibit B**

**REDACTED**

**(copy-two)**

REDACTED

DOCUMENTS BEARING BATES NUMBERS

20240025-OPCROG8-00018672 THROUGH 20240025-OPCROG8-00018954

ARE REDACTED IN ITS ENTIRETY

**REDACTED**  
**DOCUMENT BEARING BATES NUMBER 20240025-**  
**OPCROG8-00018994**  
**IS REDACTED IN ITS ENTIRETY**

**REDACTED**  
**DOCUMENTS BEARING BATES NUMBER 20240025-**  
**OPCPOD8-00018277 THROUGH 20240025-OPCPOD8-**  
**00018352**  
**ARE REDACTED IN THEIR ENTIRETY**

# Exhibit C

## DUKE ENERGY FLORIDA Confidentiality Justification Matrix

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
DEF's Response to OPC's Eighth Request for Production of Documents (Nos. 78-86), specifically, Question 83.	<b>Question 83:</b> Documents bearing bates numbers 20240025-OPCPOD8-00018277 through 20240025-OPCPOD8-00018352 are confidential in their entirety.	§366.093(3)(d), F.S. 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.  §366.093(3)(e), F.S. 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.
DEF's Response to OPC's Eighth Set of Interrogatories (Nos. 211-221), specifically, Question 211.	<b>Question 211:</b> Documents bearing bates numbers 20240025-OPCROG8-00018769 through 20240025-OPCROG8-00018594 are confidential in their entirety.	§366.093(3)(e), F.S. 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.
DEF's Response to OPC's Eighth Set of Interrogatories (Nos. 211-221), specifically, Question 221.	<b>Question 221:</b> The document bearing bates number 20240025-OPCROG8-00018994 is confidential in its entirety.	§366.093(3)(d), F.S. The documents in question contain confidential information, the disclosure of which would impair DEF's



		<p>efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), F.S. 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.</p>
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# **Exhibit D**

## **AFFIDAVITS OF REBEKAH E. BUCK AND VANESSA GOFF**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20240025-EI

Dated: June 3, 2024

**AFFIDAVIT OF REBEKAH E. BUCK IN SUPPORT OF  
DUKE ENERGY FLORIDA, LLC'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Rebekah E. Buck. 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 Business Services, LLC ("DEBS") as Director of Allocations and Reporting. DEBS provides various administrative and other services to DEF.

3. As Director of Allocations and Reporting, I am responsible for various accounting activities, including the cost allocation processes for service company costs utilized for Duke

Energy Corporation and its affiliates (like DEF).

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Eighth Set of Interrogatories, Question 211. 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 Confidentiality 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 Eighth Set of Interrogatories, Question 211, contain basis data calculations underlying costs allocated to or from DEF via its affiliates. This information is internal, proprietary business information. Thus, it relates to DEF's competitive business interests, and, absent confidential classification, its disclosure 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.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the \_\_\_\_ day of \_\_\_\_\_, 2024.

---

(Signature)  
Rebekah E. Buck  
Director, Allocations and Reporting  
Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this \_\_\_\_ day of \_\_\_\_\_, 2024 by Rebekah E. Buck. She is personally known to me or has produced her \_\_\_\_\_ driver's license, or her \_\_\_\_\_ as identification.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed Name)

(AFFIX NOTARIAL SEAL)

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

\_\_\_\_\_  
(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: June 3, 2024

**AFFIDAVIT OF VANESSA GOFF IN SUPPORT OF  
DUKE ENERGY FLORIDA, LLC'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

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”) Eighth Request for Production of Documents, Question 83, and Eighth Set of Interrogatories, Question 221. 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 Confidentiality 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 Eighth Request for Production of Documents, Question 83, and Eighth Set of Interrogatories, Question 221, 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 solar 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 \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
(Signature)  
Vanessa Goff  
Director, Renewables Business Development  
Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this \_\_\_ day of \_\_\_\_\_, 2024 by Vanessa Goff. She is personally known to me or has produced her \_\_\_\_\_ driver's license, or her \_\_\_\_\_ as identification.

\_\_\_\_\_  
(Signature)

(AFFIX NOTARIAL SEAL)

\_\_\_\_\_  
(Printed Name)  
NOTARY PUBLIC, STATE OF \_\_\_\_\_

\_\_\_\_\_  
(Commission Expiration Date)

\_\_\_\_\_  
(Serial Number, If Any)