



Dianne M. Triplett
DEPUTY GENERAL COUNSEL

June 6, 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 Responses to Sierra Club's Third Set of Interrogatories (Nos. 76-90). 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 (affidavit of 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 16, 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 6, 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 Sierra Club’s Third Set of Interrogatories (Nos. 76-90). DEF’s Notice of Intent to Request Confidential Classification was filed May 16, 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 Sierra Club’s Third Set of Interrogatories, specifically, Question 90, 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 16, 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 the affidavit of 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, the information at issue in DEF’s response to Sierra Club’s Third Set of Interrogatories, Question 90, includes internal sensitive business information about DEF’s solar projects, including its capital expenditures and maintenance costs. 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.

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 6th of June, 2024.

/s/Dianne M. 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 6th day of June, 2024.

/s/ Dianne M. Triplett
Attorney

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lkilling@llw-law.com

Exhibit A

“CONFIDENTIAL”

(filed under separate cover on May 16, 2024)

Exhibit B

REDACTED

(copy-one)

2020-2023 Placed in Service Solar

Operations and Maintenance Costs (excludes land lease, property taxes and insurance)

Values in \$'s

Project Capacity (MW-ac) O&M Type	Columbia 74.9		Debary 74.9		Santa Fe 74.9		Twin Rivers 74.9		Duette 74.9		Sandy Creek 74.9		Fort Gi 74.9
	Expensed	Capitalized	Expensed	Capitalized	Expensed	Capitalized	Expensed	Capitalized	Expensed	Capitalized	Expensed	Capitalized	Expensed
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2020-2023 Placed in Service Solar

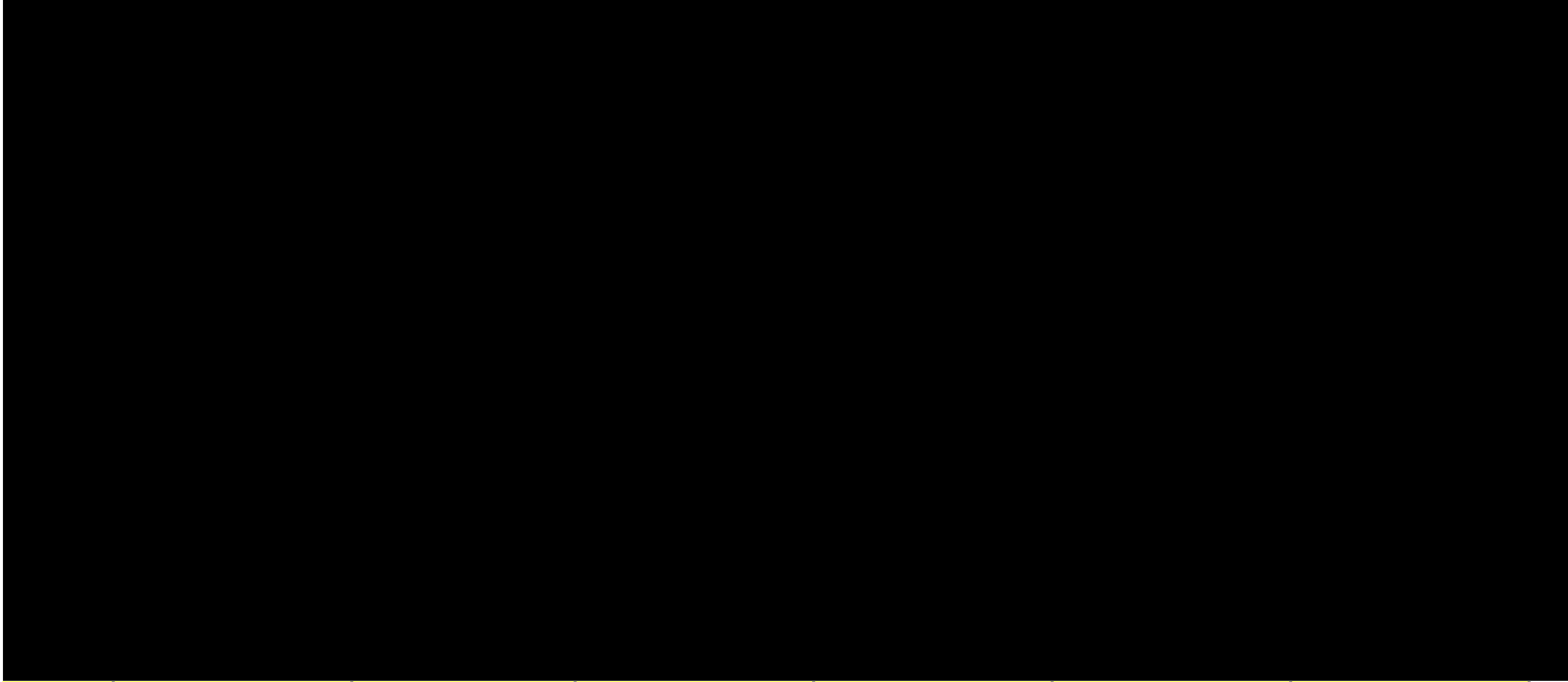
Operations and Maintenance Costs (excludes land lease, property taxes and insurance)

Values in \$/kW(ac)-yr

Project Capacity (MW-ac)	Columbia 74.9	Debary 74.9	Santa Fe 74.9	Twin Rivers 74.9	Duette 74.9	Sandy Creek 74.9	Fort Gi 74.9
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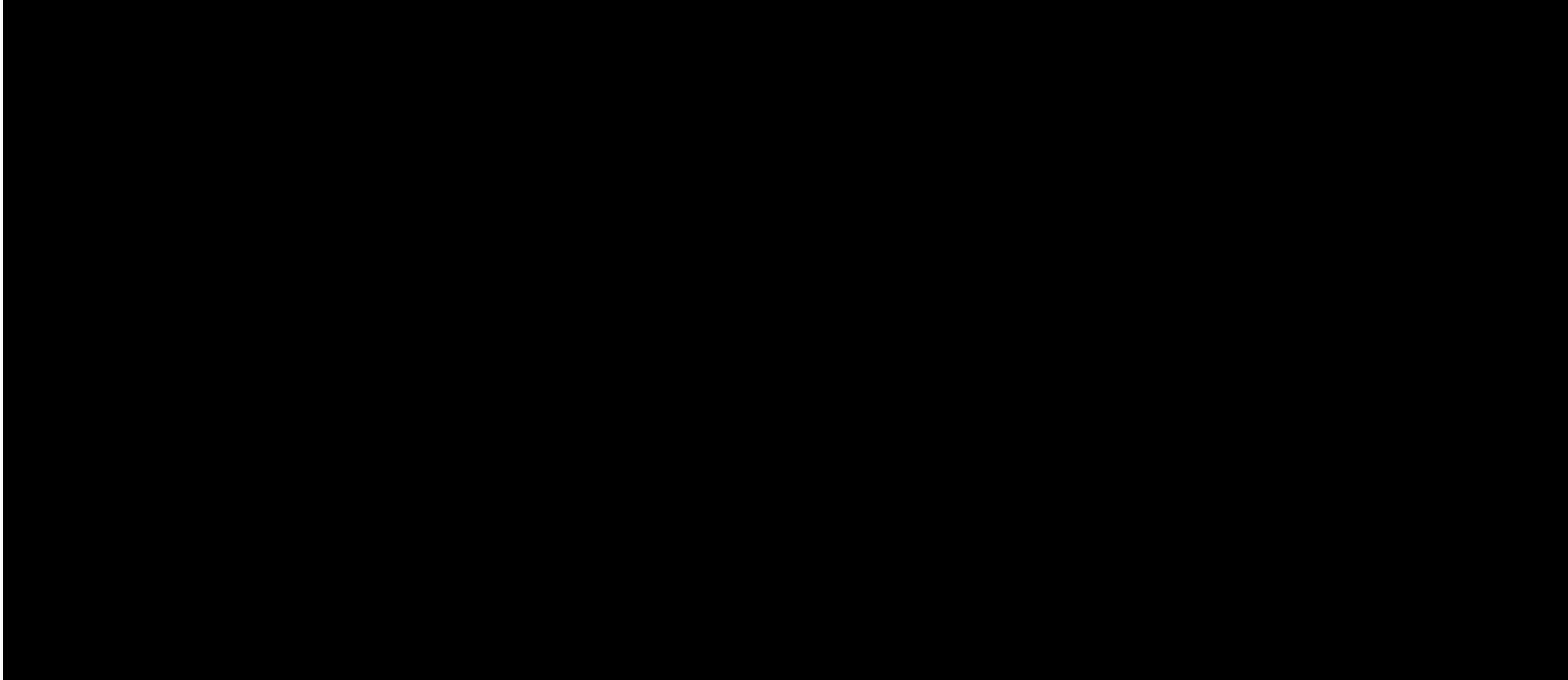
<i>O&M Type</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>
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reen 9	Charlie Creek 74.9		Bay Trail 74.9		Hildreth 74.9		High Springs 74.9		Bay Ranch 74.9		Hardeetown 74.9	
	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	



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<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>
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Solar Actuals - Placed in Service 2020 - 2023

Project Name	In Service Year	Inservice Date	MW(ac)	MW(dc)	Solar CapEx Actuals	Interconnection Facilities Actuals	Network Upgrade Actuals
Bay Ranch	2023	4/29/2023	74.9	105.98			
Bay Trail	2022	9/16/2022	74.9	94.9			
Charlie Creek	2022	8/10/2022	74.9	99.69			
Columbia	2020	3/17/2020	74.9	105.6			
Debary	2020	5/14/2020	74.5	102.28			
Duette	2021	10/25/2021	74.5	96.8			
Fort Green	2022	6/10/2022	74.9	126.67			
Hardeetown	2023	4/24/2023	74.9	106.13			
High Springs	2023	4/6/2023	74.9	100.5			
Hildreth	2023	4/1/2023	74.9	106.94			
Sandy Creek	2022	5/17/2022	74.9	98.83			
Santa Fe	2021	3/5/2021	74.9	100.4			
Twin Rivers	2021	3/21/2021	74.9	98.3			

Project Name	Solar ONLY		Solar + Network Upgrade	
	\$/kWac	\$/kWdc	\$/kWac	\$/kWdc
Bay Ranch				
Bay Trail				
Charlie Creek				
Columbia				
Debary				
Duette				
Fort Green				
Hardeetown				
High Springs				
Hildreth				
Sandy Creek				
Santa Fe				
Twin Rivers				

Exhibit B

REDACTED

(copy-two)

2020-2023 Placed in Service Solar

Operations and Maintenance Costs (excludes land lease, property taxes and insurance)

Values in \$'s

Project Capacity (MW-ac) O&M Type	Columbia 74.9		Debary 74.9		Santa Fe 74.9		Twin Rivers 74.9		Duette 74.9		Sandy Creek 74.9		Fort Gi 74.9
	Expensed	Capitalized	Expensed	Capitalized	Expensed	Capitalized	Expensed	Capitalized	Expensed	Capitalized	Expensed	Capitalized	Expensed
Year 1													
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2020-2023 Placed in Service Solar

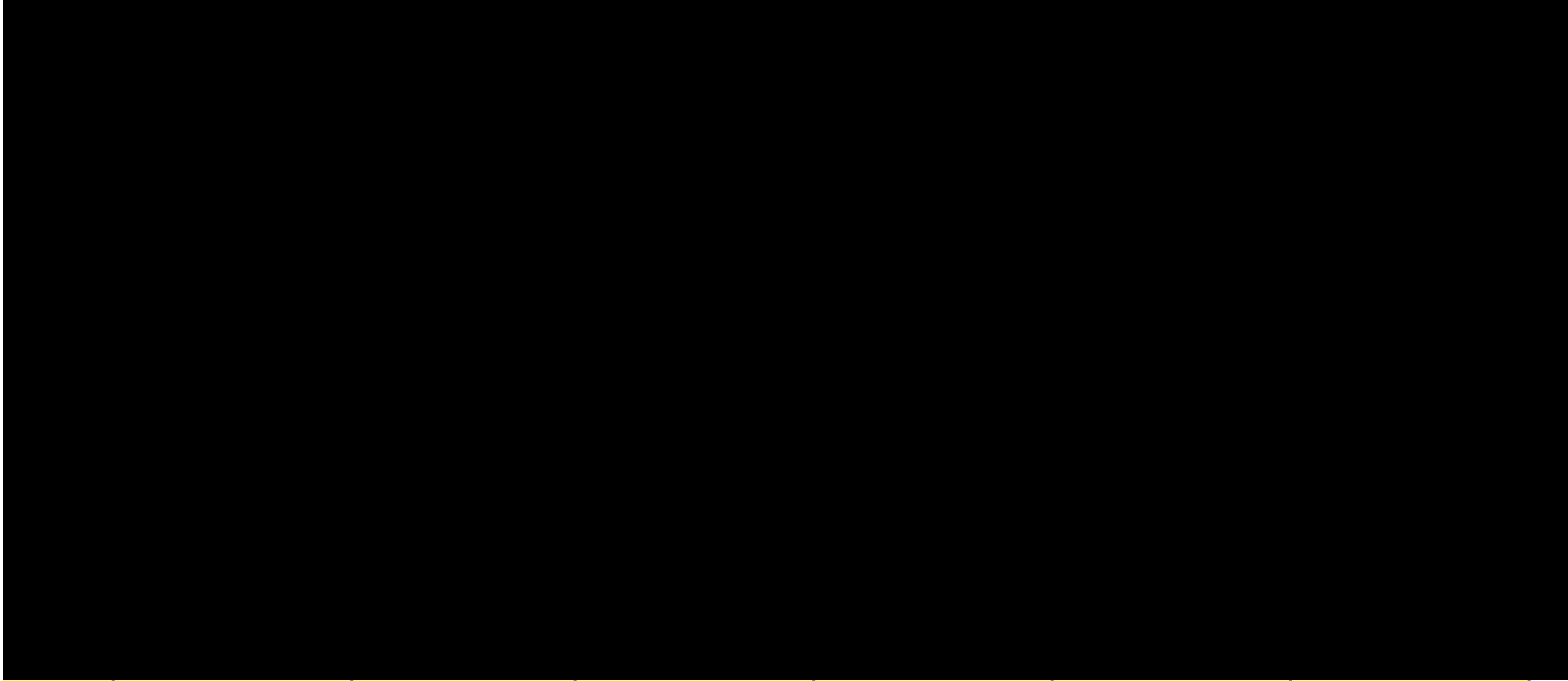
Operations and Maintenance Costs (excludes land lease, property taxes and insurance)

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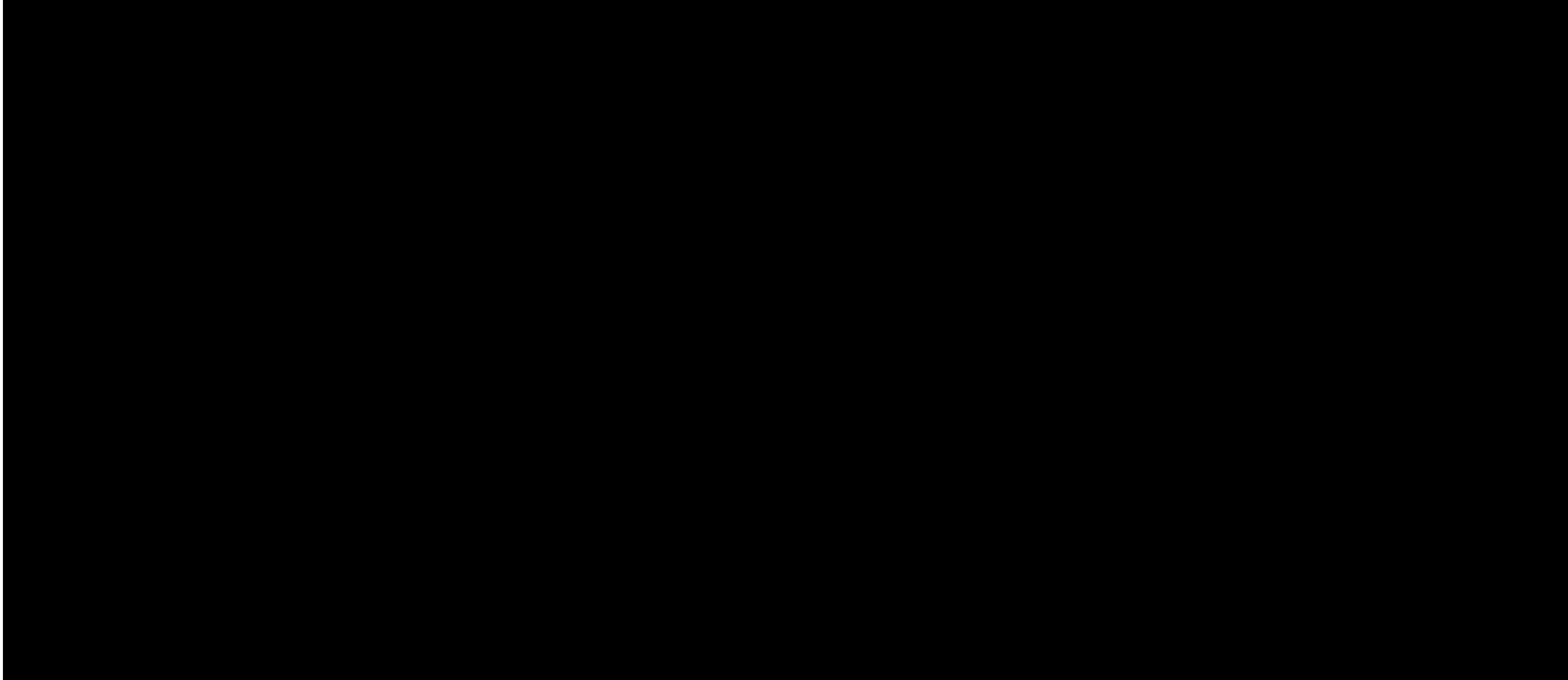
<i>O&M Type</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>
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	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	



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<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>	<i>Expensed</i>	<i>Capitalized</i>
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Project Name	Solar ONLY		Solar + Network Upgrade	
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Bay Ranch				
Bay Trail				
Charlie Creek				
Columbia				
Debary				
Duette				
Fort Green				
Hardeetown				
High Springs				
Hildreth				
Sandy Creek				
Santa Fe				
Twin Rivers				

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
DEF's Response to Sierra Club's Third Set of Interrogatories (Nos. 76-90), Question 90.	Question 90: Documents bearing bates numbers 20240025-SierraClubROG3-0000489 and 20240025-SierraClubROG3-00000490 through 20240025-SierraClubROG3-00000493 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.

Exhibit D

AFFIDAVIT OF 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 6, 2024

**AFFIDAVIT OF VANESSA GOFF 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 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 Sierra Club’s Third Set of Interrogatories, Question 90. 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 Sierra Club’s Third Set of Interrogatories, Question 90, contain confidential information. Specifically, these documents contain internal sensitive business information about DEF’s solar projects, including its capital expenditures and maintenance costs. 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)