

Dianne M. Triplett DEPUTY GENERAL COUNSEL

June 18, 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 LULAC and FL Rising's Third Set of Interrogatories (Nos. 54-78). 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 Marcia Olivier and Brian Lloyd)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on May 28, 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

DOCKET NO. 20240025-EI

for rate increase

Dated: June 18, 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 DEF's Response

to Florida Rising and League of United Latin American Citizens' (together, "LULAC") Third Set

of Interrogatories (Nos. 54-78).

DEF's Notice of Intent to Request Confidential Classification was filed May 28, 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 LULAC's Third Set of Interrogatories, Questions 66, 67,

and 74, 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 unreducted copies of all

documents for which DEF seeks confidential treatment. Composite Exhibit A was submitted

separately in a sealed envelope labeled "CONFIDENTIAL" on May 28, 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 Marcia J. Olivier and Brian M. Lloyd, 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 LULAC's Third Set of Interrogatories, Questions 66 and 67, 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, these documents contain information relating to DEF's costs with respect to electric service below the substation level. That information relates to DEF's competitive business interests, and, thus, its disclosure would impair DEF's ability to compete in the marketplace.
- (b) The information at issue in DEF's response to LULAC's Third Set of Interrogatories, Question 74, includes sensitive business information relating to competitors' costs per kW and usage on a seasonal basis. These documents also compare DEF's costs to those of its competitors. This information is proprietary and relates to DEF's competitive business interests. 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 18th day of June, 2024.

/s/Dianne M. Triplett

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### **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 18th day of June, 2024.

# /s/ Dianne M. Triplett Attorney

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# Exhibit A

# "CONFIDENTIAL"

(filed under separate cover on May 28, 2024)

# **Exhibit B**

# **REDACTED**

(copy-one)

FLORIDA RISING'S & LEAGUE OF UNITED LATIN AMERICAN CITIZENS' THIRD SET OF INTERROGATORIES (NOS. 54-78) TO DUKE ENERGY FLORIDA ROG 3-66 and 3-67

	DD OD CDTV I INIT			Court of Otto	
CATEGORY	PROPERTY UNIT TYPES	DEFINITION	UNIT OF MEASURE	Count of CUs in	
ARRESTERS		B PROVIDES LIGHTING PROTECTION ON OVERHEAD EQUIPMENT RATED BETWEEN OKV AND 10KV PHASE TO GROUND	EACH	asset category 13	
ARRESTERS		D PROVIDES LIGHTING PROTECTION ON OVERHEAD EQUIPMENT RATED BETWEEN 11KV AND 18KV PHASE TO GROUND	EACH	8	
ARRESTERS		2 PROVIDES LIGHTING PROTECTION ON UNDERGROUND EQUIPMENT RATED BETWEEN 0KV AND 10KV PHASE TO GROUND	EACH	2	
ARRESTERS	3530854	4 PROVIDES LIGHTING PROTECTION ON UNDERGROUND EQUIPMENT RATED BETWEEN 11KV AND 18KV PHASE TO GROUND	EACH	1	
CABINET	3530789	9 USED TO PROVIDE A MEANS OF OPERATING AND/OR SWITCHING CURRENT FEEDS IN UNDERGROUND LINES	EACH	20	
CABLE	651941416	5 UNDERGROUND 600V NETWORK CABLE	LINEAR FT	6	
CABLE	651941449	9 UNDERGROUND 600V 1/0 ALUMINUM SINGLE WIRE SECONDARY CABLE	LINEAR FT	1	
CABLE	651941423	3 UNDERGROUND 15KV PRIMARY 1000 ALUMINUM CABLE	LINEAR FT	12	
CABLE	651941428	B UNDERGROUND 600V 4/0 COPPER SECONDARY CABLE	LINEAR FT	4	
CABLE		B UNDERGROUND 600V 2/0 ALUMINUM MULTIPLEX SECONDARY CABLE	LINEAR FT	11	
CABLE		D UNDERGROUND 600V 4/0 ALUMINUM MULTIPLEX LIGHTING CABLE	LINEAR FT	3	
CABLE		4 UNDERGROUND 15KV PRIMARY 500 ALUMINUM CABLE	LINEAR FT	5	
CABLE		2 UNDERGROUND 600V 500 ALUMINUM SINGLE WIRE SERVICE CABLE	LINEAR FT	1	
CABLE		D UNDERGROUND 600V 4/0 COPPER SERVICE CABLE	LINEAR FT	3	
CABLE CABLE		4 OVERHEAD 600V 1/0 ALUMINUM LIGHTING TRIPLEX WIRE WITH LASHING INCLUDED 2 OVERHEAD 600V 1/0 ALUMINUM LIGHTING DUPLEX WIRE WITH LASHING INCLUDED	LINEAR FT LINEAR FT	2	
CABLE		3 UNDERGROUND 600V #2 ALUMINUM LIGHTING TRIPLEX WIRE	LINEAR FT	2	
CABLE		D UNDERGROUND 600V #4 ALUMINUM LIGHTING TRIPLEX WIRE	LINEAR FT	2	
CABLE		7 UNDERGROUND 600V 4/0 ALUMINUM MULTIPLEX SECONDARY CABLE	LINEAR FT	8	
CABLE		1 UNDERGROUND 600V #6 ALUMINUM LIGHTING DUPLEX WIRE	LINEAR FT	2	
CABLE		7 #2 GROUND WIRE FOR A VAULT	EACH	1	
CABLE		1 UNDERGROUND 15KV PRIMARY 4/0 COPPER CABLE	LINEAR FT	4	
CABLE	651941427	7 UNDERGROUND 600V 500 COPPER SECONDARY CABLE	LINEAR FT	2	
CABLE	651941508	3 OVERHEAD 600V #4 ALUMINUM SINGLE PHASE SECONDARY DUPLEX WIRE	LINEAR FT	1	
CABLE	651941507	7 OVERHEAD 600V 1/0 ALUMINUM SINGLE PHASE SECONDARY TRIPLEX WIRE WITH LASHING INCLUDED	LINEAR FT	1	
CABLE		5 OVERHEAD 600V 4/0 ALUMINUM SINGLE PHASE SECONDARY TRIPLEX WIRE WITH LASHING INCLUDED	LINEAR FT	1	
CABLE		5 OVERHEAD 600V 1/0 ALUMINUM THREE PHASE SECONDARY QUADRUPLEX WIRE WITH LASHING INCLUDED	LINEAR FT	1	
CABLE		5 OVERHEAD 600V 4/0 ALUMINUM THREE PHASE SECONDARY QUADRUPLEX WIRE WITH LASHING INCLUDED	LINEAR FT	1	
CABLE		L UNDERGROUND 600V 500 COPPER SERVICE CABLE	LINEAR FT	5	
CABLE		D UNDERGROUND 600V 1/0 ALUMINUM MULTIPLEX SERVICE CABLE	LINEAR FT	4	
CABLE		9 UNDERGROUND 600V 4/0 ALUMINUM MULTIPLEX SERVICE CABLE	LINEAR FT	4	
CABLE CABLE		B UNDERGROUND 600V 1/0 ALUMINUM SINGLE WIRE SERVICE CABLE 5 UNDERGROUND 600V 500 ALUMINUM MULTIPLEX SERVICE CABLE	LINEAR FT LINEAR FT	3	
CABLE		3 UNDERGROUND 600V 4/0 ALUMINUM SINGLE WIRE SERVICE CABLE	LINEAR FT	1	
CABLE		5 UNDERGROUND 25KV PRIMARY 1/0 ALUMINUM CABLE	LINEAR FT	8	
CABLE		5 UNDERGROUND 15KV PRIMARY 1/0 ALUMINUM CABLE	LINEAR FT	4	
CABLE		2 UNDERGROUND 15KV PRIMARY THREE PHASE PRIMARY BUNDLED CONDUCTOR	LINEAR FT	28	
CABLE		5 OVERHEAD 600V 1/0 ALUMINUM SINGLE PHASE SECONDARY DUPLEX WIRE	LINEAR FT	1	
CABLE	651941499	9 OVERHEAD 600V #6 ALUMINUM SINGLE PHASE SECONDARY DUPLEX WIRE	LINEAR FT	1	
CABLE	651941504	4 OVERHEAD 600V #2 ALUMINUM THREE PHASE SECONDARY QUADRUPLEX WIRE	LINEAR FT	1	
CABLE	651941503	3 OVERHEAD 600V 4/0 ALUMINUM THREE PHASE SECONDARY QUADRUPLEX WIRE	LINEAR FT	1	
CABLE		O OVERHEAD 600V #2 ALUMINUM SINGLE PHASE SECONDARY TRIPLEX WIRE	LINEAR FT	1	
CABLE		1 OVERHEAD 600V 1/0 ALUMINUM SINGLE PHASE SECONDARY TRIPLEX WIRE	LINEAR FT	1	
CABLE		5 OVERHEAD 600V 4/0 ALUMINUM SINGLE PHASE SECONDARY TRIPLEX WIRE	LINEAR FT	1	
CABLE		D PROVIDES A MEANS OF EXTENDING THE LIFE OF DAMAGED EXISTING UNDERGOUND CABLE WITHOUT HAVING TO REPLACE IT	LINEAR FT	1	
CABLE		2 OVERHEAD PRIMARY AND SECONDARY 2/0 COPPER SINGLE WIRE	LINEAR FT	1	
CABLE CABLE		O OVERHEAD PRIMARY AND SECONDARY #4 COPPER SINGLE WIRE O OVERHEAD PRIMARY AND SECONDARY #6 COPPER SINGLE WIRE	LINEAR FT LINEAR FT	2	
CABLE		L OVERHEAD PRIMARY AND SECONDARY 1/0 ALUMINUM SINGLE WIRE	LINEAR FT	3	
CABLE		O OVERHEAD SPACER 1/O ALUMINUM SINGLE WIRE	LINEAR FT	1	
CABLE		B OVERHEAD SECONDARY #4 ALUMINUM SINGLE WIRE	LINEAR FT	1	
CABLE		9 OVERHEAD PRIMARY AND SECONDARY 4/0 ALUMINUM SINGLE WIRE	LINEAR FT	1	
CABLE		5 OVERHEAD PRIMARY AND SECONDARY 336 ALUMINUM SINGLE WIRE	LINEAR FT	2	
CABLE	651941555	5 OVERHEAD PRIMARY AND SECONDARY 795 ALUMINUM SINGLE WIRE	LINEAR FT	2	
CABLE	651941554	4 OVERHEAD SPACER 795 ALUMINUM SINGLE WIRE	LINEAR FT	1	
CABLE		3 OVERHEAD PRIMARY AND SECONDARY 2/0 COPPER SINGLE WIRE	LINEAR FT	2	
CABLE		) LIGHTING CABLE FOR INSIDE LIGHT BRACKETS AND LIGHT POLES	LINEAR FT	1	
CABLE		5 OVERHEAD SMALL STATIC/NEUTRAL WIRE	LINEAR FT	3	
CABLE		L OVERHEAD PRIMARY AND SECONDARY 4/0 COPPER SINGLE WIRE	LINEAR FT	2	
CAPACITOR		7 USED FOR 100KVAR SINGLE PHASE FIXED CAPACITOR CAN REPLACEMENT	EACH	1	
CAPACITOR CAPACITOR		3 USED FOR 200KVAR SINGLE PHASE FIXED CAPACITOR CAN REPLACEMENT L USED FOR 400KVAR SINGLE PHASE FIXED CAPACITOR CAN REPLACEMENT	EACH EACH	4	
CAPACITUR	00194125	E OJED I ON HOUNDARK JINGLE FRASE FIXED CAPACITOR CAIN REPLACEIVIENT	LACH	2	

CAPACITOR	651941255 USED FOR 1200KVAR THREE PHASE FIXED CAPACITOR BANK	EACH	1
CAPACITOR	651941256 USED FOR 600KVAR THREE PHASE FIXED CAPACITOR BANK	EACH	1 <mark>.</mark>
CAPACITOR	651941247 USED FOR 1200KVAR THREE PHASE SWITCHED CAPACITOR BANK	EACH	6
CAPACITOR	651941248 USED FOR 600KVAR THREE PHASE SWITCHED CAPACITOR BANK	EACH	2
CAPACITOR	651941258 USED FOR REPLACING CAPACITOR VACUUM SWITCH ON THREE PHASE SWITCHED CAPACITOR BANKS	EACH	2
CONDUIT	651941471 NON-RIGID CONDUIT TO PROVIDE PROTECTION FOR SECONDARY/SERVICE UNDERGROUND CABLE	LINEAR FT	1
	531941475 RIGID CONDUIT TO PROVIDE PROTECTION FOR UNDERGROUND LIGHTING CABLE IN NORMAL SOIL		- Carlotte and the Carlotte
CONDUIT		LINEAR FT	1
CONDUIT	651941477 NON-RIGID CONDUIT TO PROVIDE PROTECTION FOR SMALL UNDERGROUND INFRASTRUCTURE CABLE	LINEAR FT	8
CONDUIT	651941479 NON-RIGID CONDUIT TO PROVIDE PROTECTION FOR MEDIUM UNDERGROUND INFRASTRUCTURE CABLE	LINEAR FT	3 <mark>.</mark>
CONDUIT	651941495 RIGID CONDUIT TO PROVIDE PROTECTION FOR SMALL UNDERGROUND INFRASTRUCTURE CABLE	LINEAR FT	4 <mark>-</mark>
CONDUIT	651941494 RIGID CONDUIT TO PROVIDE PROTECTION FOR MEDIUM UNDERGROUND INFRASTRUCTURE CABLE	LINEAR FT	12
CONDUIT	651941476 RIGID CONDUIT TO PROVIDE PROTECTION FOR SECONDARY/SERVICE UNDERGROUND CABLE	LINEAR FT	2
CONDUIT	651941497 NON-RIGID CONDUIT TO PROVIDE PROTECTION FOR LARGE UNDERGROUND INFRASTRUCTURE CABLE	LINEAR FT	1
			2
CONDUIT	651941485 PROVIDES PROTECTION FOR LARGE SIZED UNDERGROUND CABLE IN SENSITIVE AREAS OR SERVING CRITICAL INFRASTRUCTURE.	LINEAR FT	· · · · · · · · · · · · · · · · · · ·
CONDUIT	651941493 PROVIDES PROTECTION FOR LIGHTING UNDERGROUND CABLE IN SENSITIVE AREAS	LINEAR FT	2
CONDUIT	651941487 PROVIDES PROTECTION FOR SMALL SIZED UNDERGROUND CABLE IN SENSITIVE AREAS OR SERVING CRITICAL INFRASTRUCTURE.	LINEAR FT	2
CONDUIT	651941486 PROVIDES PROTECTION FOR MEDIUM SIZED UNDERGROUND CABLE IN SENSITIVE AREAS OR SERVING CRITICAL INFRASTRUCTURE.	LINEAR FT	5
ONTROLS	651941250 USED FOR CAPACITOR RELAY TO TELL SWITCHED CAPACITORS TO TURN ON OR OFF	EACH	3 <mark>-</mark>
ONTROLS	3532566 USED FOR REALTIME AUTOMATION CONTROLS AT THE INTERCONNECTION BETWEEN RENEWABLE GENERATION SITES AND DISTRIBUTI	ON LIN EACH	1
GHTING	651940798 USED FOR HIGH PRESSURE SODIUM LIGHTING FIXTURES	EACH	127
GHTING	3530824 USED FOR IFD HIGHTING FIXTURES	FACH	292
GHTING	651940796 USED FOR METAL HALIDE AND PULSE START METAL HALIDE NON-FLOOD LIGHTING FXITURES	EACH	23
GHTING	651940795 USED FOR MERCURY VAPOR LIGHTING FIXTURES	EACH	21
GHTING	651940797 USED FOR METAL HALIDE AND PULSE START METAL HALIDE FLOOD LIGHTING FXITURES	EACH	22 <mark>-</mark>
GHTING	3532556 USED FOR REMOTE CONTROLLABLE PHOTOCELLS ON LIGHT FIXTURES	EACH	2
IANHOLE	651941492 USED FOR 4 WAY FEED THROUGH MANHOLES FOR UNDERGROUND INFRASTRUCTURE WHERE PHSYICAL ENTRY IS REQUIRED	EACH	6
IANHOLE	651941480 USED FOR 3 WAY FEED THROUGH MANHOLES FOR UNDERGROUND INFRASTRUCTURE WHERE PHSYICAL ENTRY IS REQUIRED	EACH	1
IANHOLE	651941484 USED FOR SPLICING AND SECTIONALIZING LONG RUNS OF UNDERGROUND CABLE WHERE PHYSICAL ENTRY ISN'T REQUIRED	EACH	2
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ANHOLE	651941491 USED FOR INFRASTRUCURE EQUIPMENT PLACEMENT TO SERVE CUSTOMERS. TYPICALLY IN HIGH RISE BUILDINGS	EACH	1
ETERING	651940947 USED FOR ENERGIZING SINGLE PHASE RESIDENTIAL SERVICE WHERE METER WAS ALREADY CAPITALIZED	EACH	1
IETERING	651940936 PT/CT FOR METERING APPLICATIONS	EACH	9
METERING	651940935 PT/CT CLUSTERS FOR POWER DISTRIBUTION LINE PROTECTION DEVICES	EACH	6 <mark>-</mark>
METERING	651940938 REPLACEMENT PTs FOR INDIVIDUAL PTs IN LINE PROTECTION PT CLUSTERS	EACH	2
/IISCELLANEOUS	651940138 USED FOR TELECOM DEVICES INSTALLED ON DISTRIBUITON LINES TO ENABLE REMOTE METER READING	EACH	4
MISCELLANEOUS	651940033 DUMMY RETIREMENT UNIT USED WHEN CAPITAL WORK ORDERS WERE CLOSED EARLY IN ERROR	EACH	9
OLE	651940787 USED FOR CONCRETE LIGHTING POLES WITH TOP TENON BETWEEN 16FT AND 30FT	EACH	9
			· · · · · · · · · · · · · · · · · · ·
OLE	651940805 USED FOR ALUMINUM LIGHTING POLES	EACH	52
OLE	651940789 USED FOR SPECIALITY BREAKAWAY LIGHTING POLES	EACH	3
OLE	651940785 USED FOR CONCRETE LIGHTING POLES WITHOUT A TOP TENON	EACH	57
OLE	651940804 USED FOR FIBERGLASS LIGHTING POLES	EACH	28
OLE	651940786 USED FOR CONCRETE LIGHTING POLES WITH TOP TENON BETWEEN 0FT AND 15FT	EACH	2
OLE	651940788 USED FOR CONCRETE LIGHTING POLES WITH TOP TENON OVER 30FT	EACH	17
OLE	651941557 USED FOR WOOD DISTRIBUTION POLES	EACH	90
DLE	651941560 USED FOR REINFORCING WOOD DISTRIBUTION POLES TO EXTEND THEIR LIFE RATHER THAN REPLACING THE POLE	EACH	2
			· · · · · · · · · · · · · · · · · · ·
OLE	651941558 USED FOR CONCRETE DISTRIBUTION POLES	EACH	29
OLE	651941559 USED FOR STEEL DISTRIBUTION POLES	EACH	12
DLE	3532589 USED TO RETREAT POLES TO PROVIDE EXTRA PROTECTION TO EXTEND POLE LIFE TO AVOID REPLACEMENT OF POLE	EACH	1 <mark>.</mark>
ROTECTION	3530844 USED FOR OVERHEAD LINE FUSE PROTECTION	EACH	40 <u> </u>
OTECTION	3530846 USED FOR OVERHEAD EQUIPMENT FUSE PROTECTION	EACH	12
ROTECTION	651941133 USED FOR 1600A UNDERGROUND CABLE NETWORK PROTECTION	EACH	3
ROTECTION	651941131 USED FOR 1875A UNDERGROUND CABLE NETWORK PROTECTION	FACH	1
		EACH	1
ROTECTION	651941130 USED FOR 2500A UNDERGROUND CABLE NETWORK PROTECTION		- Carlotte and the Carlotte
ROTECTION	651941544 USED FOR PROTECTING OVERHEAD LINES BY SECTION THEM OFF INTO SMALLER SEGMENTS	EACH	12
ROTECTION	651941370 USED FOR 100KVA NETWORK TRANSFORMER PROTECTION	EACH	3
ROTECTION	651941376 USED FOR 10KVA NETWORK TRANSFORMER PROTECTION	EACH	3 <mark>.</mark>
ROTECTION	651941375 USED FOR 15KVA NETWORK TRANSFORMER PROTECTION	EACH	2
OTECTION	651941536 USED FOR RECLOSING PROTECTION DEVICES ON DISTRIBUTION LINES	EACH	109
GULATOR	651941286 USED FOR 100AMP 76.2KVA VOLTAGE REGULATION/STABILIZATION ON 12.47/7.2KV CIRCUITS	EACH	3
GULATOR	651941280 USED FOR 200AMP 288KVA VOLTAGE REGULATION/STABILIZATION ON 24-94/14-4KV CIRCUITS	EACH	1
			2
EGULATOR	651941284 USED FOR 219AMP 167KVA VOLTAGE REGULATION/STABILIZATION ON 13.2/7.6KV CIRCUITS	EACH	— <mark>-                                   </mark>
EGULATOR	651941283 USED FOR 328AMP 250KVA VOLTAGE REGULATION/STABILIZATION ON 13.2/7.6KV CIRCUITS	EACH	2
EGULATOR	651941282 USED FOR 438AMP 333KVA VOLTAGE REGULATION/STABILIZATION ON 13.2/7.6KV CIRCUITS	EACH	2
TRUCTURE	651941470 USED AS A BASE/SUPPORT STRUCTURE UNDERNEATH OUR PADMOUNTED ELECTRICAL EQUIPMENT	EACH	45 <mark>-</mark>
	3530769 USED FOR LOCAL FAULT INDICATING TO IDENTIFY UNDERGROUND CABLE WHERE FAULT IS LOCATED	EACH	7
SENSORS			
		EACH	2
SENSORS	3530766 USED FOR REMOTE VOLTAGE/CURRENT MONITORING AS WELL AS FAULT MONITORING AND LOCATING		2
SENSORS SENSORS SERVICES SERVICES		EACH EACH EACH	2 3 11

SERVICES	651941057 USED FOR OVERHEDA 4 WIRE SERVICES	EACH	6
SWITCH	651941461 USED FOR PADMOUNTED SWITCHGEAR REMOTE OPERATED AUTOMATIC SOURCE CHANGE SWITCH	EACH	1
SWITCH	651941434 USED FOR PADMOUNTED SWITCHGEAR AND LOCALLY OPERATED CONTROL SWITCHES	EACH	78
SWITCH	651941542 USED FOR OVERHEAD THREE PHASE GANG SWITCHES WITH REMOTE OPERATING CAPABILITY	EACH	5
PROTECTION	651941438 USED FOR PADMOUNTED NETWORK ISOLATION SWITCHES	EACH	3
SWITCH	651941543 USED FOR POWERHEAD MANUALLY OPERATED SINGLE PHASE NON-CONTROLLABLE SWITCHES	EACH	20
SWITCH	651941539 USED FOR OVERHEAD MANUALLY OFFARIED SINGLE FRASE ROUNCUSTACLES WILLIES WILLIES 651941539 USED FOR OVERHEAD MANUALLY OFFARED SINGLE FRASE ROUNCUSTACLES WITH SOURCE TRANSFER ABILITY WITHOUT REMOTE OPERATING CAPABILITY	EACH	4
SWITCH	651941538 USED FOR OVERHEAD THREE PHASE GANG OPERATED SWITCHES WITH JOURCE TRANSFER ABILITY	EACH	1
TRANSFORMERS	651941119 USED FOR A 15KVA SINGLE PHASE OVERHEAD TRANSFORMER WITH 480V PRIMARY SIDE AND 240/120V SECONDARY SIDE	EACH	1
TRANSFORMERS	051341119 USED FOR A 1000KVA THREE PHASE OVERNEAU INAUSTORNIER WITH 400V FRIENDRATH SIDE AND 240/120V SECUNDANT SIDE 651941220 USED FOR A 1000KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.447/7.2KV CIRCUITS	EACH	6
TRANSFORMERS	6519412219 USED FOR A 1500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	6
TRANSFORMERS	651941217 USED FOR A 2500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	6
TRANSFORMERS	651941221 USED FOR A 200KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.4477.2kV CIRCUITS 651941222 USED FOR A 500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.4477.2kV CIRCUITS	EACH	8
TRANSFORMERS	651941221 USED FOR A 750KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12-47/7.2KV CIRCUIS	EACH	8
TRANSFORMERS	651941382 USED FOR A 30KWA INGEE PHASE AUGINOUNIED INMANSFORMER ON 12-41/7-2KV CIRCUITS	EACH	6
TRANSFORMERS	651941357 USED FOR 100KVA OVERHEAD FOR DOWN POWER TRANSFORMERS OF 12.47/7.28V CIRCUITS	EACH	3
TRANSFORMERS	651941121 USED FOR 25KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	12
	·	EACH	7
TRANSFORMERS	651941152 USED FOR 50KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMERS ON 13.2/7.6KV CIRCUITS		
TRANSFORMERS TRANSFORMERS	651941123 USED FOR 10KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12, 47/7-2KV CIRCUITS	EACH EACH	5
	651941127 USED FOR 1 KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS		8
TRANSFORMERS	651941122 USED FOR 15KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	
TRANSFORMERS	651941381 USED FOR 167KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	14
TRANSFORMERS	651941150 USED FOR 25KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	2
TRANSFORMERS	651941161 USED FOR 25KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941109 USED FOR 25KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 4.16/2.4KV CIRCUITS	EACH	1
TRANSFORMERS	651941126 USED FOR 3KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	1
TRANSFORMERS	651941379 USED FOR 333KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	3
TRANSFORMERS	651941151 USED FOR 333KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	1
TRANSFORMERS	651941081 USED FOR 37.5KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	2
TRANSFORMERS	651941078 USED FOR 500KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	2
TRANSFORMERS	651941153 USED FOR 500KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941384 USED FOR 50KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	8
TRANSFORMERS	651941159 USED FOR 50KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941107 USED FOR 50KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 4.16/2.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941125 USED FOR 5 KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	4
TRANSFORMERS	651941383 USED FOR 75KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	4
TRANSFORMERS	651941173 USED FOR 75KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	1
TRANSFORMERS	651941158 USED FOR 75KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	1
TRANSFORMERS	651941386 USED FOR 100KVA SINGLE PHASE PADMOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941172 USED FOR 100KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMERS ON 13.2/7.6KV CIRCUITS	EACH	1
TRANSFORMERS	651941292 USED FOR 1500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	1
TRANSFORMERS	651941225 USED FOR 150KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	4
TRANSFORMERS	651941328 USED FOR 150KVA THREE PHASE PADMOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	3
TRANSFORMERS	651941319 USED FOR 150KVA THREE PHASE PADMOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	1
TRANSFORMERS	651941385 USED FOR 167KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	6
TRANSFORMERS	651941218 USED FOR 2000KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	2
TRANSFORMERS	651941390 USED FOR 25KVA SINGLE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	5
TRANSFORMERS	651941216 USED FOR 3000KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	3
TRANSFORMERS	651941224 USED FOR 300KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	4
TRANSFORMERS	651941326 USED FOR 300KVA THREE PHASE PADMOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	4
TRANSFORMERS	651941215 USED FOR 3750KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	3
TRANSFORMERS	651941324 USED FOR 500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	2
TRANSFORMERS	651941295 USED FOR 500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941388 USED FOR 50KVA SINGLE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	6
TRANSFORMERS	651941334 USED FOR 750KVA THREE PHASE PADMOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	2
TRANSFORMERS	651941227 USED FOR 75KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	8
TRANSFORMERS	651941387 USED FOR 75KVA SINGLE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	3

67. Please indicate how many different sizes or capacities or types of each component are deployed to provide customers with electric service at the level below the substation level of the grid. Please provide the respective cost and difference in functionality for each

different size or type. For example, if Duke uses different kinds of residential meters, what are differences in costs and applications for each type of meter?

### **Response:**

Please see information below for the cost information requested, except for material costs associated with meters, which are shown in the confidential table below:

### REDACTED

Туре	Average Cost
120, 240v, 480v 2 wire	
120/208v 3 wire	
120/240v 3 wire	
Three phase 4 wire	
Transformer rated	

The table is confidential: a redacted version is attached hereto and unredacted copies have been submitted with the Florida Public Service Commission along with DEF's Notice of Intent to Request Confidential Classification dated May 28, 2024.

For all equipment deployed to provide electric service to customers, DEF determines the kind and capacity of equipment based on electrical and mechanical loading that is forecasted to be on the equipment based on customer provided information. For example, distribution pole size and placement depend on municipal guidelines, regulations set by the National Electric Safety Code (NESC), and customer provided information, such as site plans.

DEF Engineers and project teams design, construct, and complete scope at the most cost- effective manner possible for the scope of work in keeping with the Florida Administrative Code, Duke Energy Tariff (General rules and Regulations Governing Electric Service) and the Requirements for Electric Service and Meter Installation.

# DOCUMENTS BEARING BATES NUMBERS 20240025-LULACFLRISINGROG3-00001043 through 20240025-LULACFLRISINGROG3-00001669

ARE REDACTED IN THEIR ENTIRETY

# **Exhibit B**

# **REDACTED**

(copy-two)

FLORIDA RISING'S & LEAGUE OF UNITED LATIN AMERICAN CITIZENS' THIRD SET OF INTERROGATORIES (NOS. 54-78) TO DUKE ENERGY FLORIDA ROG 3-66 and 3-67

	DD OD CDTV I INIT			Court of Otto	
CATEGORY	PROPERTY UNIT TYPES	DEFINITION	UNIT OF MEASURE	Count of CUs in	
ARRESTERS		B PROVIDES LIGHTING PROTECTION ON OVERHEAD EQUIPMENT RATED BETWEEN OKV AND 10KV PHASE TO GROUND	EACH	asset category 13	
ARRESTERS		D PROVIDES LIGHTING PROTECTION ON OVERHEAD EQUIPMENT RATED BETWEEN 11KV AND 18KV PHASE TO GROUND	EACH	8	
ARRESTERS		2 PROVIDES LIGHTING PROTECTION ON UNDERGROUND EQUIPMENT RATED BETWEEN 0KV AND 10KV PHASE TO GROUND	EACH	2	
ARRESTERS	3530854	4 PROVIDES LIGHTING PROTECTION ON UNDERGROUND EQUIPMENT RATED BETWEEN 11KV AND 18KV PHASE TO GROUND	EACH	1	
CABINET	3530789	9 USED TO PROVIDE A MEANS OF OPERATING AND/OR SWITCHING CURRENT FEEDS IN UNDERGROUND LINES	EACH	20	
CABLE	651941416	5 UNDERGROUND 600V NETWORK CABLE	LINEAR FT	6	
CABLE	651941449	9 UNDERGROUND 600V 1/0 ALUMINUM SINGLE WIRE SECONDARY CABLE	LINEAR FT	1	
CABLE	651941423	3 UNDERGROUND 15KV PRIMARY 1000 ALUMINUM CABLE	LINEAR FT	12	
CABLE	651941428	B UNDERGROUND 600V 4/0 COPPER SECONDARY CABLE	LINEAR FT	4	
CABLE		B UNDERGROUND 600V 2/0 ALUMINUM MULTIPLEX SECONDARY CABLE	LINEAR FT	11	
CABLE		D UNDERGROUND 600V 4/0 ALUMINUM MULTIPLEX LIGHTING CABLE	LINEAR FT	3	
CABLE		4 UNDERGROUND 15KV PRIMARY 500 ALUMINUM CABLE	LINEAR FT	5	
CABLE		2 UNDERGROUND 600V 500 ALUMINUM SINGLE WIRE SERVICE CABLE	LINEAR FT	1	
CABLE		D UNDERGROUND 600V 4/0 COPPER SERVICE CABLE	LINEAR FT	3	
CABLE CABLE		4 OVERHEAD 600V 1/0 ALUMINUM LIGHTING TRIPLEX WIRE WITH LASHING INCLUDED 2 OVERHEAD 600V 1/0 ALUMINUM LIGHTING DUPLEX WIRE WITH LASHING INCLUDED	LINEAR FT LINEAR FT	2	
CABLE		3 UNDERGROUND 600V #2 ALUMINUM LIGHTING TRIPLEX WIRE	LINEAR FT	2	
CABLE		D UNDERGROUND 600V #4 ALUMINUM LIGHTING TRIPLEX WIRE	LINEAR FT	2	
CABLE		7 UNDERGROUND 600V 4/0 ALUMINUM MULTIPLEX SECONDARY CABLE	LINEAR FT	8	
CABLE		1 UNDERGROUND 600V #6 ALUMINUM LIGHTING DUPLEX WIRE	LINEAR FT	2	
CABLE		7 #2 GROUND WIRE FOR A VAULT	EACH	1	
CABLE		1 UNDERGROUND 15KV PRIMARY 4/0 COPPER CABLE	LINEAR FT	4	
CABLE	651941427	7 UNDERGROUND 600V 500 COPPER SECONDARY CABLE	LINEAR FT	2	
CABLE	651941508	3 OVERHEAD 600V #4 ALUMINUM SINGLE PHASE SECONDARY DUPLEX WIRE	LINEAR FT	1	
CABLE	651941507	7 OVERHEAD 600V 1/0 ALUMINUM SINGLE PHASE SECONDARY TRIPLEX WIRE WITH LASHING INCLUDED	LINEAR FT	1	
CABLE		5 OVERHEAD 600V 4/0 ALUMINUM SINGLE PHASE SECONDARY TRIPLEX WIRE WITH LASHING INCLUDED	LINEAR FT	1	
CABLE		5 OVERHEAD 600V 1/0 ALUMINUM THREE PHASE SECONDARY QUADRUPLEX WIRE WITH LASHING INCLUDED	LINEAR FT	1	
CABLE		5 OVERHEAD 600V 4/0 ALUMINUM THREE PHASE SECONDARY QUADRUPLEX WIRE WITH LASHING INCLUDED	LINEAR FT	1	
CABLE		L UNDERGROUND 600V 500 COPPER SERVICE CABLE	LINEAR FT	5	
CABLE		D UNDERGROUND 600V 1/0 ALUMINUM MULTIPLEX SERVICE CABLE	LINEAR FT	4	
CABLE		9 UNDERGROUND 600V 4/0 ALUMINUM MULTIPLEX SERVICE CABLE	LINEAR FT	4	
CABLE CABLE		B UNDERGROUND 600V 1/0 ALUMINUM SINGLE WIRE SERVICE CABLE 5 UNDERGROUND 600V 500 ALUMINUM MULTIPLEX SERVICE CABLE	LINEAR FT LINEAR FT	3	
CABLE		3 UNDERGROUND 600V 4/0 ALUMINUM SINGLE WIRE SERVICE CABLE	LINEAR FT	1	
CABLE		5 UNDERGROUND 25KV PRIMARY 1/0 ALUMINUM CABLE	LINEAR FT	8	
CABLE		5 UNDERGROUND 15KV PRIMARY 1/0 ALUMINUM CABLE	LINEAR FT	4	
CABLE		2 UNDERGROUND 15KV PRIMARY THREE PHASE PRIMARY BUNDLED CONDUCTOR	LINEAR FT	28	
CABLE		5 OVERHEAD 600V 1/0 ALUMINUM SINGLE PHASE SECONDARY DUPLEX WIRE	LINEAR FT	1	
CABLE	651941499	9 OVERHEAD 600V #6 ALUMINUM SINGLE PHASE SECONDARY DUPLEX WIRE	LINEAR FT	1	
CABLE	651941504	4 OVERHEAD 600V #2 ALUMINUM THREE PHASE SECONDARY QUADRUPLEX WIRE	LINEAR FT	1	
CABLE	651941503	3 OVERHEAD 600V 4/0 ALUMINUM THREE PHASE SECONDARY QUADRUPLEX WIRE	LINEAR FT	1	
CABLE		O OVERHEAD 600V #2 ALUMINUM SINGLE PHASE SECONDARY TRIPLEX WIRE	LINEAR FT	1	
CABLE		1 OVERHEAD 600V 1/0 ALUMINUM SINGLE PHASE SECONDARY TRIPLEX WIRE	LINEAR FT	1	
CABLE		5 OVERHEAD 600V 4/0 ALUMINUM SINGLE PHASE SECONDARY TRIPLEX WIRE	LINEAR FT	1	
CABLE		D PROVIDES A MEANS OF EXTENDING THE LIFE OF DAMAGED EXISTING UNDERGOUND CABLE WITHOUT HAVING TO REPLACE IT	LINEAR FT	1	
CABLE		2 OVERHEAD PRIMARY AND SECONDARY 2/0 COPPER SINGLE WIRE	LINEAR FT	1	
CABLE CABLE		O OVERHEAD PRIMARY AND SECONDARY #4 COPPER SINGLE WIRE O OVERHEAD PRIMARY AND SECONDARY #6 COPPER SINGLE WIRE	LINEAR FT LINEAR FT	2	
CABLE		L OVERHEAD PRIMARY AND SECONDARY 1/0 ALUMINUM SINGLE WIRE	LINEAR FT	3	
CABLE		O OVERHEAD SPACER 1/O ALUMINUM SINGLE WIRE	LINEAR FT	1	
CABLE		B OVERHEAD SECONDARY #4 ALUMINUM SINGLE WIRE	LINEAR FT	1	
CABLE		9 OVERHEAD PRIMARY AND SECONDARY 4/0 ALUMINUM SINGLE WIRE	LINEAR FT	1	
CABLE		5 OVERHEAD PRIMARY AND SECONDARY 336 ALUMINUM SINGLE WIRE	LINEAR FT	2	
CABLE	651941555	5 OVERHEAD PRIMARY AND SECONDARY 795 ALUMINUM SINGLE WIRE	LINEAR FT	2	
CABLE	651941554	4 OVERHEAD SPACER 795 ALUMINUM SINGLE WIRE	LINEAR FT	1	
CABLE		3 OVERHEAD PRIMARY AND SECONDARY 2/0 COPPER SINGLE WIRE	LINEAR FT	2	
CABLE		) LIGHTING CABLE FOR INSIDE LIGHT BRACKETS AND LIGHT POLES	LINEAR FT	1	
CABLE		5 OVERHEAD SMALL STATIC/NEUTRAL WIRE	LINEAR FT	3	
CABLE		L OVERHEAD PRIMARY AND SECONDARY 4/0 COPPER SINGLE WIRE	LINEAR FT	2	
CAPACITOR		7 USED FOR 100KVAR SINGLE PHASE FIXED CAPACITOR CAN REPLACEMENT	EACH	1	
CAPACITOR CAPACITOR		3 USED FOR 200KVAR SINGLE PHASE FIXED CAPACITOR CAN REPLACEMENT L USED FOR 400KVAR SINGLE PHASE FIXED CAPACITOR CAN REPLACEMENT	EACH EACH	4	
CAPACITUR	00194125	E OJED I ON HOUNDARK JINGLE FRASE FIXED CAPACITOR CAIN REPLACEIVIENT	LACH	2	

CAPACITOR	651941255 USED FOR 1200KVAR THREE PHASE FIXED CAPACITOR BANK	EACH	1
CAPACITOR	651941256 USED FOR 600KVAR THREE PHASE FIXED CAPACITOR BANK	EACH	1 <mark>.</mark>
CAPACITOR	651941247 USED FOR 1200KVAR THREE PHASE SWITCHED CAPACITOR BANK	EACH	6
CAPACITOR	651941248 USED FOR 600KVAR THREE PHASE SWITCHED CAPACITOR BANK	EACH	2
CAPACITOR	651941258 USED FOR REPLACING CAPACITOR VACUUM SWITCH ON THREE PHASE SWITCHED CAPACITOR BANKS	EACH	2
CONDUIT	651941471 NON-RIGID CONDUIT TO PROVIDE PROTECTION FOR SECONDARY/SERVICE UNDERGROUND CABLE	LINEAR FT	1
	531941475 RIGID CONDUIT TO PROVIDE PROTECTION FOR UNDERGROUND LIGHTING CABLE IN NORMAL SOIL		- Carlotte and the Carlotte
CONDUIT		LINEAR FT	1
CONDUIT	651941477 NON-RIGID CONDUIT TO PROVIDE PROTECTION FOR SMALL UNDERGROUND INFRASTRUCTURE CABLE	LINEAR FT	8
CONDUIT	651941479 NON-RIGID CONDUIT TO PROVIDE PROTECTION FOR MEDIUM UNDERGROUND INFRASTRUCTURE CABLE	LINEAR FT	3 <mark>.</mark>
CONDUIT	651941495 RIGID CONDUIT TO PROVIDE PROTECTION FOR SMALL UNDERGROUND INFRASTRUCTURE CABLE	LINEAR FT	4 <mark>-</mark>
CONDUIT	651941494 RIGID CONDUIT TO PROVIDE PROTECTION FOR MEDIUM UNDERGROUND INFRASTRUCTURE CABLE	LINEAR FT	12
CONDUIT	651941476 RIGID CONDUIT TO PROVIDE PROTECTION FOR SECONDARY/SERVICE UNDERGROUND CABLE	LINEAR FT	2
CONDUIT	651941497 NON-RIGID CONDUIT TO PROVIDE PROTECTION FOR LARGE UNDERGROUND INFRASTRUCTURE CABLE	LINEAR FT	1
			2
CONDUIT	651941485 PROVIDES PROTECTION FOR LARGE SIZED UNDERGROUND CABLE IN SENSITIVE AREAS OR SERVING CRITICAL INFRASTRUCTURE.	LINEAR FT	· · · · · · · · · · · · · · · · · · ·
CONDUIT	651941493 PROVIDES PROTECTION FOR LIGHTING UNDERGROUND CABLE IN SENSITIVE AREAS	LINEAR FT	2
CONDUIT	651941487 PROVIDES PROTECTION FOR SMALL SIZED UNDERGROUND CABLE IN SENSITIVE AREAS OR SERVING CRITICAL INFRASTRUCTURE.	LINEAR FT	2
CONDUIT	651941486 PROVIDES PROTECTION FOR MEDIUM SIZED UNDERGROUND CABLE IN SENSITIVE AREAS OR SERVING CRITICAL INFRASTRUCTURE.	LINEAR FT	5
ONTROLS	651941250 USED FOR CAPACITOR RELAY TO TELL SWITCHED CAPACITORS TO TURN ON OR OFF	EACH	3 <mark>-</mark>
ONTROLS	3532566 USED FOR REALTIME AUTOMATION CONTROLS AT THE INTERCONNECTION BETWEEN RENEWABLE GENERATION SITES AND DISTRIBUTI	ON LIN EACH	1
GHTING	651940798 USED FOR HIGH PRESSURE SODIUM LIGHTING FIXTURES	EACH	127
GHTING	3530824 USED FOR IFD HIGHTING FIXTURES	FACH	292
GHTING	651940796 USED FOR METAL HALIDE AND PULSE START METAL HALIDE NON-FLOOD LIGHTING FXITURES	EACH	23
GHTING	651940795 USED FOR MERCURY VAPOR LIGHTING FIXTURES	EACH	21
GHTING	651940797 USED FOR METAL HALIDE AND PULSE START METAL HALIDE FLOOD LIGHTING FXITURES	EACH	22 <mark>-</mark>
GHTING	3532556 USED FOR REMOTE CONTROLLABLE PHOTOCELLS ON LIGHT FIXTURES	EACH	2
IANHOLE	651941492 USED FOR 4 WAY FEED THROUGH MANHOLES FOR UNDERGROUND INFRASTRUCTURE WHERE PHSYICAL ENTRY IS REQUIRED	EACH	6
IANHOLE	651941480 USED FOR 3 WAY FEED THROUGH MANHOLES FOR UNDERGROUND INFRASTRUCTURE WHERE PHSYICAL ENTRY IS REQUIRED	EACH	1
IANHOLE	651941484 USED FOR SPLICING AND SECTIONALIZING LONG RUNS OF UNDERGROUND CABLE WHERE PHYSICAL ENTRY ISN'T REQUIRED	EACH	2
			· · · · · · · · · · · · · · · · · · ·
ANHOLE	651941491 USED FOR INFRASTRUCURE EQUIPMENT PLACEMENT TO SERVE CUSTOMERS. TYPICALLY IN HIGH RISE BUILDINGS	EACH	1
ETERING	651940947 USED FOR ENERGIZING SINGLE PHASE RESIDENTIAL SERVICE WHERE METER WAS ALREADY CAPITALIZED	EACH	1
IETERING	651940936 PT/CT FOR METERING APPLICATIONS	EACH	9
METERING	651940935 PT/CT CLUSTERS FOR POWER DISTRIBUTION LINE PROTECTION DEVICES	EACH	6 <mark>-</mark>
METERING	651940938 REPLACEMENT PTs FOR INDIVIDUAL PTs IN LINE PROTECTION PT CLUSTERS	EACH	2
/IISCELLANEOUS	651940138 USED FOR TELECOM DEVICES INSTALLED ON DISTRIBUITON LINES TO ENABLE REMOTE METER READING	EACH	4
MISCELLANEOUS	651940033 DUMMY RETIREMENT UNIT USED WHEN CAPITAL WORK ORDERS WERE CLOSED EARLY IN ERROR	EACH	9
OLE	651940787 USED FOR CONCRETE LIGHTING POLES WITH TOP TENON BETWEEN 16FT AND 30FT	EACH	9
			· · · · · · · · · · · · · · · · · · ·
OLE	651940805 USED FOR ALUMINUM LIGHTING POLES	EACH	52
OLE	651940789 USED FOR SPECIALITY BREAKAWAY LIGHTING POLES	EACH	3
OLE	651940785 USED FOR CONCRETE LIGHTING POLES WITHOUT A TOP TENON	EACH	57
OLE	651940804 USED FOR FIBERGLASS LIGHTING POLES	EACH	28
OLE	651940786 USED FOR CONCRETE LIGHTING POLES WITH TOP TENON BETWEEN 0FT AND 15FT	EACH	2
OLE	651940788 USED FOR CONCRETE LIGHTING POLES WITH TOP TENON OVER 30FT	EACH	17
OLE	651941557 USED FOR WOOD DISTRIBUTION POLES	EACH	90
DLE	651941560 USED FOR REINFORCING WOOD DISTRIBUTION POLES TO EXTEND THEIR LIFE RATHER THAN REPLACING THE POLE	EACH	2
			· · · · · · · · · · · · · · · · · · ·
OLE	651941558 USED FOR CONCRETE DISTRIBUTION POLES	EACH	29
OLE	651941559 USED FOR STEEL DISTRIBUTION POLES	EACH	12
DLE	3532589 USED TO RETREAT POLES TO PROVIDE EXTRA PROTECTION TO EXTEND POLE LIFE TO AVOID REPLACEMENT OF POLE	EACH	1 <mark>.</mark>
ROTECTION	3530844 USED FOR OVERHEAD LINE FUSE PROTECTION	EACH	40 <u> </u>
OTECTION	3530846 USED FOR OVERHEAD EQUIPMENT FUSE PROTECTION	EACH	12
ROTECTION	651941133 USED FOR 1600A UNDERGROUND CABLE NETWORK PROTECTION	EACH	3
ROTECTION	651941131 USED FOR 1875A UNDERGROUND CABLE NETWORK PROTECTION	FACH	1
		EACH	1
ROTECTION	651941130 USED FOR 2500A UNDERGROUND CABLE NETWORK PROTECTION		- Carlotte and the Carlotte
ROTECTION	651941544 USED FOR PROTECTING OVERHEAD LINES BY SECTION THEM OFF INTO SMALLER SEGMENTS	EACH	12
ROTECTION	651941370 USED FOR 100KVA NETWORK TRANSFORMER PROTECTION	EACH	3
ROTECTION	651941376 USED FOR 10KVA NETWORK TRANSFORMER PROTECTION	EACH	3 <mark>.</mark>
ROTECTION	651941375 USED FOR 15KVA NETWORK TRANSFORMER PROTECTION	EACH	2
OTECTION	651941536 USED FOR RECLOSING PROTECTION DEVICES ON DISTRIBUTION LINES	EACH	109
GULATOR	651941286 USED FOR 100AMP 76.2KVA VOLTAGE REGULATION/STABILIZATION ON 12.47/7.2KV CIRCUITS	EACH	3
GULATOR	651941280 USED FOR 200AMP 288KVA VOLTAGE REGULATION/STABILIZATION ON 24-94/14-4KV CIRCUITS	EACH	1
			2
EGULATOR	651941284 USED FOR 219AMP 167KVA VOLTAGE REGULATION/STABILIZATION ON 13.2/7.6KV CIRCUITS	EACH	— <mark>-                                   </mark>
EGULATOR	651941283 USED FOR 328AMP 250KVA VOLTAGE REGULATION/STABILIZATION ON 13.2/7.6KV CIRCUITS	EACH	2
EGULATOR	651941282 USED FOR 438AMP 333KVA VOLTAGE REGULATION/STABILIZATION ON 13.2/7.6KV CIRCUITS	EACH	2
TRUCTURE	651941470 USED AS A BASE/SUPPORT STRUCTURE UNDERNEATH OUR PADMOUNTED ELECTRICAL EQUIPMENT	EACH	45 <mark>-</mark>
	3530769 USED FOR LOCAL FAULT INDICATING TO IDENTIFY UNDERGROUND CABLE WHERE FAULT IS LOCATED	EACH	7
SENSORS			
		EACH	2
SENSORS	3530766 USED FOR REMOTE VOLTAGE/CURRENT MONITORING AS WELL AS FAULT MONITORING AND LOCATING		2
SENSORS SENSORS SERVICES SERVICES		EACH EACH EACH	2 3 11

SERVICES	651941057 USED FOR OVERHEDA 4 WIRE SERVICES	EACH	6
SWITCH	651941461 USED FOR PADMOUNTED SWITCHGEAR REMOTE OPERATED AUTOMATIC SOURCE CHANGE SWITCH	EACH	1
SWITCH	651941434 USED FOR PADMOUNTED SWITCHGEAR AND LOCALLY OPERATED CONTROL SWITCHES	EACH	78
SWITCH	651941542 USED FOR OVERHEAD THREE PHASE GANG SWITCHES WITH REMOTE OPERATING CAPABILITY	EACH	5
PROTECTION	651941438 USED FOR PADMOUNTED NETWORK ISOLATION SWITCHES	EACH	3
SWITCH	651941543 USED FOR POWERHEAD MANUALLY OPERATED SINGLE PHASE NON-CONTROLLABLE SWITCHES	EACH	20
SWITCH	651941539 USED FOR OVERHEAD MANUALLY OFFARIED SINGLE FRASE ROUNCUSTACLES WILLIES WILLIES 651941539 USED FOR OVERHEAD MANUALLY OFFARED SINGLE FRASE ROUNCUSTACLES WITH SOURCE TRANSFER ABILITY WITHOUT REMOTE OPERATING CAPABILITY	EACH	4
SWITCH	651941538 USED FOR OVERHEAD THREE PHASE GANG OPERATED SWITCHES WITH JOURCE TRANSFER ABILITY	EACH	1
TRANSFORMERS	651941119 USED FOR A 15KVA SINGLE PHASE OVERHEAD TRANSFORMER WITH 480V PRIMARY SIDE AND 240/120V SECONDARY SIDE	EACH	1
TRANSFORMERS	051341119 USED FOR A 1000KVA THREE PHASE OVERNEAU INAUSTORNIER WITH 400V FRIENDRATH SIDE AND 240/120V SECUNDANT SIDE 651941220 USED FOR A 1000KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.447/7.2KV CIRCUITS	EACH	6
TRANSFORMERS	6519412219 USED FOR A 1500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	6
TRANSFORMERS	651941217 USED FOR A 2500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	6
TRANSFORMERS	651941221 USED FOR A 200KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.4477.2kV CIRCUITS 651941222 USED FOR A 500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.4477.2kV CIRCUITS	EACH	8
TRANSFORMERS	651941221 USED FOR A 750KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12-47/7.2KV CIRCUIS	EACH	8
TRANSFORMERS	651941382 USED FOR A 30KWA INGEE PHASE AUGINOUNIED INMANSFORMER ON 12-41/7-2KV CIRCUITS	EACH	6
TRANSFORMERS	651941357 USED FOR 100KVA OVERHEAD FOR DOWN POWER TRANSFORMERS OF 12.47/7.28V CIRCUITS	EACH	3
TRANSFORMERS	651941121 USED FOR 25KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	12
	·	EACH	7
TRANSFORMERS	651941152 USED FOR 50KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMERS ON 13.2/7.6KV CIRCUITS		
TRANSFORMERS TRANSFORMERS	651941123 USED FOR 10KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12, 47/7-2KV CIRCUITS	EACH EACH	5
	651941127 USED FOR 1 KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS		8
TRANSFORMERS	651941122 USED FOR 15KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12. 47/7.2KV CIRCUITS	EACH	
TRANSFORMERS	651941381 USED FOR 167KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	14
TRANSFORMERS	651941150 USED FOR 25KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	2
TRANSFORMERS	651941161 USED FOR 25KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941109 USED FOR 25KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 4.16/2.4KV CIRCUITS	EACH	1
TRANSFORMERS	651941126 USED FOR 3KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	1
TRANSFORMERS	651941379 USED FOR 333KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	3
TRANSFORMERS	651941151 USED FOR 333KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	1
TRANSFORMERS	651941081 USED FOR 37.5KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	2
TRANSFORMERS	651941078 USED FOR 500KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	2
TRANSFORMERS	651941153 USED FOR 500KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941384 USED FOR 50KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	8
TRANSFORMERS	651941159 USED FOR 50KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941107 USED FOR 50KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 4.16/2.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941125 USED FOR 5 KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	4
TRANSFORMERS	651941383 USED FOR 75KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	4
TRANSFORMERS	651941173 USED FOR 75KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	1
TRANSFORMERS	651941158 USED FOR 75KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	1
TRANSFORMERS	651941386 USED FOR 100KVA SINGLE PHASE PADMOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941172 USED FOR 100KVA SINGLE PHASE OVERHEAD POLE MOUNTED TRANSFORMERS ON 13.2/7.6KV CIRCUITS	EACH	1
TRANSFORMERS	651941292 USED FOR 1500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	1
TRANSFORMERS	651941225 USED FOR 150KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	4
TRANSFORMERS	651941328 USED FOR 150KVA THREE PHASE PADMOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	3
TRANSFORMERS	651941319 USED FOR 150KVA THREE PHASE PADMOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	1
TRANSFORMERS	651941385 USED FOR 167KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	6
TRANSFORMERS	651941218 USED FOR 2000KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	2
TRANSFORMERS	651941390 USED FOR 25KVA SINGLE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	5
TRANSFORMERS	651941216 USED FOR 3000KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	3
TRANSFORMERS	651941224 USED FOR 300KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	4
TRANSFORMERS	651941326 USED FOR 300KVA THREE PHASE PADMOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	4
TRANSFORMERS	651941215 USED FOR 3750KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	3
TRANSFORMERS	651941324 USED FOR 500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	2
TRANSFORMERS	651941295 USED FOR 500KVA THREE PHASE PADMOUNTED TRANSFORMER ON 24.94/14.4KV CIRCUITS	EACH	2
TRANSFORMERS	651941388 USED FOR 50KVA SINGLE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	6
TRANSFORMERS	651941334 USED FOR 750KVA THREE PHASE PADMOUNTED TRANSFORMER ON 13.2/7.6KV CIRCUITS	EACH	2
TRANSFORMERS	651941227 USED FOR 75KVA THREE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	8
TRANSFORMERS	651941387 USED FOR 75KVA SINGLE PHASE PADMOUNTED TRANSFORMER ON 12.47/7.2KV CIRCUITS	EACH	3

67. Please indicate how many different sizes or capacities or types of each component are deployed to provide customers with electric service at the level below the substation level of the grid. Please provide the respective cost and difference in functionality for each

different size or type. For example, if Duke uses different kinds of residential meters, what are differences in costs and applications for each type of meter?

### **Response:**

Please see information below for the cost information requested, except for material costs associated with meters, which are shown in the confidential table below:

### REDACTED

Туре	Average Cost
120, 240v, 480v 2 wire	
120/208v 3 wire	
120/240v 3 wire	
Three phase 4 wire	
Transformer rated	

The table is confidential: a redacted version is attached hereto and unredacted copies have been submitted with the Florida Public Service Commission along with DEF's Notice of Intent to Request Confidential Classification dated May 28, 2024.

For all equipment deployed to provide electric service to customers, DEF determines the kind and capacity of equipment based on electrical and mechanical loading that is forecasted to be on the equipment based on customer provided information. For example, distribution pole size and placement depend on municipal guidelines, regulations set by the National Electric Safety Code (NESC), and customer provided information, such as site plans.

DEF Engineers and project teams design, construct, and complete scope at the most cost- effective manner possible for the scope of work in keeping with the Florida Administrative Code, Duke Energy Tariff (General rules and Regulations Governing Electric Service) and the Requirements for Electric Service and Meter Installation.

# DOCUMENTS BEARING BATES NUMBERS 20240025-LULACFLRISINGROG3-00001043 through 20240025-LULACFLRISINGROG3-00001669

ARE REDACTED IN THEIR ENTIRETY

# **Exhibit C**

# **DUKE ENERGY FLORIDA Confidentiality Justification Matrix**

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
DEF's Response to LULAC's Third Set of Interrogatories (Nos. 54-78), specifically, Question 66.	Question 66: Documents bearing bates numbers 20240025- LULACFLRISINGROG3-0 0000894 through 20240025- LULACFLRISINGROG3-0 0000896 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.  §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.

DEF's Response to LULAC's Third Set of Interrogatories (Nos. 54-78), specifically, Question 67.	Question 67: The table provided in DEF's narrative response contains confidential information. Specifically, the information in the column titled "Average Cost" is confidential.	§366.093(3)(e), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.  §366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.
DEF's Response to LULAC's Third Set of Interrogatories (Nos. 54-78), specifically, Question 74.	Question 74: Documents bearing bates numbers 20240025- LULACFLRISINGROG3- 00001043 through 20240025- LULACFLRISINGROG3- 00001669 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**

# AFFIDAVITS OF MARCIA J. OLIVIER AND BRIAN M. LLOYD

### REFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC

for rate increase

Dated: June 18, 2024

DOCKET NO. 20240025-EI

AFFIDAVIT OF BRIAN M. LLOYD 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 Brian M. Lloyd, who being first duly sworn, on oath deposes and says that:

- My name is Brian M. Lloyd. I am over the age of 18 years old, and I have been 1. 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.
  - I am employed by DEF as General Manager, Florida Major Projects. 2.
- As General Manager, my duties and responsibilities include planning for grid 3. 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 Florida Rising and League of United Latin American Citizens' (together, "LULAC") Third Set of Interrogatories, Questions 66 and 67. A detailed description of the confidential information at issue is contained in 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.
- Documents produced in response to LULAC's Third Set of Interrogatories, Questions 66 and 67, 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, these documents contain information relating to DEF's costs with respect to electric service below the substation level. That information relates to DEF's competitive business interests, and, thus, its disclosure would impair DEF's ability to compete in the marketplace.
- 7. 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.
  - This concludes my affidavit.
     Further affiant sayeth not.

Brian M. Lloyd General Manager, Florida Major Projects Duke Energy Florida, LLC
NT was sworn to and subscribed before me this 17 day yd. He is personally known to me or has produced her or his as identification.  (Signature)  (Printed Name)  NOTARY PUBLIC, STATE OF (Commission Expiration Date)
(Serial Number, If Any)

Dated the 17 day of \_\_\_\_\_\_\_, 2024.

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC

DOCKET NO. 20240025-EI

for rate increase

Dated: June 18, 2024

AFFIDAVIT OF MARCIA J. OLIVIER 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 Marcia J. Olivier, who being first duly sworn, on oath deposes and says that:

- 1. My name is Marcia J. Olivier. 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 the Director of Rates and Regulatory Planning.
- 3. As Director of Rates and Regulatory Planning, I am responsible for the preparation of jurisdictional separation studies and class cost of service studies, overseeing rate case activities, reporting actual and forecasted earnings and surveillance results, and supporting various regulatory filings and initiatives.

4. DEF is seeking confidential classification for information contained in response to Florida Rising and League of United Latin American Citizens' (together, "LULAC") Third Set of Interrogatories, Question 74. 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 information for the reasons set forth below.

5. Documents produced in response to LULAC's Third Set of Interrogatories, Question 74, contain confidential information. Specifically, these documents contain sensitive business information relating to competitors' costs per kW and usage on a seasonal basis. These documents also compare DEF's costs to those of its competitors. This information is proprietary and relates to DEF's competitive business interests. 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.

8. This concludes my affidavit.

Further affiant sayeth not.

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

(Signature)
Marcia J. Olivier
Director, Rates and Regulatory Planning

Duke Energy Florida, LLC

	ENT was sworn to and subscribed before me this day ivier. She is personally known to me or has produced her
	e, or her as identification.
	(Signature)
(AFFIX NOTARIAL SEAL)	(Printed Name) NOTARY PUBLIC, STATE OF
	(Commission Expiration Date)
	(Serial Number, If Any)