Dianne M. Triplett
DEPUTY GENERAL COUNSEL

June 24, 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 Amended Request for Confidential Classification for certain information provided in its Response and Supplemental Response to LULAC and FL Rising's First Set of Interrogatories (Nos. 1-22) and First Request for Production of Documents (Nos. 1-8). 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, Marcia Olivier, John Panizza, Lesley Quick & 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 and June 10, 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

299 First Avenue North (33701) ▪ St. Petersburg, Florida
Phone: 727.820.4692 ▪ Email: dianne.triplett@duke-energy.com

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC for rate increase	DOCKET NO. 20240025-EI Dated: June 24, 2024

DUKE ENERGY FLORIDA, LLC'S
AMENDED 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 Amended 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") First Request for Production of Documents (Nos. 1-8) and LULAC's First Set of Interrogatories (Nos. 1-22) and Supplemental Response to LULAC's First Set of Interrogatories (Nos. 1-22), respectively. DEF's Notice of Intent to Request Confidential Classification was filed May 3, 2024 and Amended Notice of Intent to Request Confidential Classification filed on June 10, 2024, respectively. 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 First Request for Production of Documents, Question 2, and to LULAC's First Set of Interrogatories, Question 10, 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 and June 10, 2024, respectively. 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 Reginald D. Anderson, Hans Jacob, Edward L. Scott, Brian M. Lloyd, Marcia Olivier, John Panizza, and Lesley Quick, 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 LULAC's First Request for Production of Documents, Question 2, and First Set of Interrogatories, Question 10, 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.

(b) The information at issue in DEF's responses to LULAC's First Request for Production of Documents, Question 2, and First Set of Interrogatories, Question 10, includes

internal sensitive business information regarding future projects and capital investments and regarding DEF's administrative 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 Amended Request be granted.

RESPECTFULLY SUBMITTED this 24th day 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 24th day of June, 2024.

/s/ Dianne M. Triplett
Attorney

Jennifer Crawford / Major Thompson / Shaw Stiller
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lkillinger@llw-law.com
jmelchior@llw-law.com

Exhibit A

"CONFIDENTIAL"

(filed under separate cover on May 3, 2024 and June 10, 2024, respectively)

Exhibit B

REDACTED

(copy-one)

REDACTED
DOCUMENTS BEARING BATES NUMBERS
20240025- LULACFLRISINGPOD1-00000001 through
20240025- LULACFLRISINGPOD1-00000018 and
20240025- LULACFLRISINGPOD1-00000030
THROUGH 20240025-LULACFLRISINGPOD1-
00000032 and 20240025- LULACFLRISINGPOD1-
00006565 through 20240025- LULACFLRISINGPOD1-
00007479
ARE REDACTED IN THEIR ENTIRETY

REDACTED
DOCUMENTS BEARING BATES NUMBERS 20240025-LULACFLRISINGROG1-00000022 THROUGH 20240025-LULACFLRISINGROG1-00000519 ARE REDACTED IN THEIR ENTIRETY

REDACTED
DOCUMENTS BEARING BATES NUMBERS 20240025-LULACFLRISINGROG1-00001782 through 20240025-LULACFLRISINGROG1-00001790 ARE REDACTED IN THEIR ENTIRETY

Exhibit B

REDACTED

(copy-two)

REDACTED
DOCUMENTS BEARING BATES NUMBERS
20240025- LULACFLRISINGPOD1-00000001 through
20240025- LULACFLRISINGPOD1-00000018 and
20240025- LULACFLRISINGPOD1-00000030
THROUGH 20240025-LULACFLRISINGPOD1-
00000032 and 20240025- LULACFLRISINGPOD1-
00006565 through 20240025- LULACFLRISINGPOD1-
00007479
ARE REDACTED IN THEIR ENTIRETY

REDACTED
DOCUMENTS BEARING BATES NUMBERS 20240025-LULACFLRISINGROG1-00000022 THROUGH 20240025-LULACFLRISINGROG1-00000519 ARE REDACTED IN THEIR ENTIRETY

REDACTED
DOCUMENTS BEARING BATES NUMBERS 20240025-LULACFLRISINGROG1-00001782 through 20240025-LULACFLRISINGROG1-00001790 ARE REDACTED IN THEIR ENTIRETY

Exhibit C

DUKE ENERGY FLORIDA
Confidentiality Justification Matrix

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
DEF's Response to LULAC's First Request for Production of Documents (Nos. 1-8), specifically, Question 2.	**Question 2:** Documents bearing bates numbers 20240025-LULACFLRISINGPOD1-00000030, 20240025-LULACFLRISINGPOD1-00007478 through 20240025-LULACFLRISINGPOD1-00007479, 20240025-LULACFLRISINGPOD1-00007477, 20240025-LULACFLRISINGPOD1-00007107 through 20240025-LULACFLRISINGPOD1-00007476, 20240025-LULACFLRISINGPOD1-00007021 through 20240025-LULACFLRISINGPOD1-00007106, 20240025-LULACFLRISINGPOD1-00006966 through 20240025-LULACFLRISINGPOD1-00007020, 20240025-LULACFLRISINGPOD1-00000001 through 20240025-LULACFLRISINGPOD1-00000018, 20240025-LULACFLRISINGPOD1-00006565 through 20240025-LULACFLRISINGPOD1-00006965 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 First Set of Interrogatories (Nos. 1-22), specifically, Question 10.	**Question 10:** Documents bearing bates numbers 20240025-LULACFLRISINGROG1-00000022 through 20240025-LULACFLRISINGROG1-00000519 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.
RESPONSE/DOCUMENT	**PAGE/LINE**	**JUSTIFICATION**
DEF's Supplemental Response to LULAC's First Set of Interrogatories (Nos. 1-22), specifically, Question 10.	**Question 10:** Documents bearing bates numbers 20240025-LULACFLRISINGROG1-00001782 through 20240025-LULACFLRISINGROG1-00001790 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.

Exhibit D

AFFIDAVITS OF REGINALD D. ANDERSON, HANS JACOB, EDWARD L. SCOTT, BRIAN M. LLOYD, MARCIA OLIVIER, JOHN PANIZZA, AND LESLEY QUICK

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 Florida Rising and League of United Latin American Citizens' (together, "LULAC") First Set of Interrogatories, Question 10. 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 LULAC's First Set of Interrogatories, Question 10, 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 29th day of May, 2024.

(Signature)
Reginald D. Anderson
Vice President, Power Generation
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 29th day of May, 2024 by Reginald D. Anderson. He is personally known to me ~~or~~ has produced his _____ driver's license, or his _____ as identification.

(Signature)
Deanna Lee Carver
(Printed Name)
NOTARY PUBLIC, STATE OF FL
July 18, 2026
(Commission Expiration Date)
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

DEANNA LEE CARVER
Commission # HH 242284
Expires July 18, 2026

DEANNA LEE CARVER
Commission # HH 242294
Expires July 18, 2026

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 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 Florida Rising and League of United Latin American Citizens' (together, "LULAC") First Request for Production of Documents, Question 2 (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 LULAC's First Request for Production of Documents, Question 2 (Energy Storage), contain confidential information. Specifically, these documents contain pricing information relating to contracts for goods and services (along with other terms of such agreements). 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 _____ day of _____, 2024.

_____
(Signature)
Hans Jacob
Director, Renewable Business Development
Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 28th day of May, 2024 by Hans Jacob. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.

_____
(Signature)
Monique Hampton
(Printed Name)
NOTARY PUBLIC, STATE OF _____

(AFFIX NOTARIAL SEAL)

MONIQUE HAMPTOM
MY COMMISSION # HH 368082
EXPIRES: June 28, 2027

_____
(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 EDWARD L. SCOTT 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 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 Duke Energy as General Manager of Transmission Planning.

3. As General Manager of Transmission Planning, I am responsible for the planning of Duke Energy's electric transmission system in six states. Areas of focus include development of company Transmission Plans, regional (SERC, RFC, FRCC) and NERC P1I as process

strategies and assessments, joint studies with adjacent interconnected utilities and RTOs/ISOs and analysis and studies as required under the FERC Open Access Transmission Tariff (OATT). I am also responsible for ensuring compliance to all safety, environmental and regulatory policies and business practices. 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 Florida Rising and League of United Latin American Citizens' (together, "LULAC") First Request for Production of Documents, Question 2 (Transmission). 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 LULAC's First Request for Production of Documents, Question 2 (Transmission), 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. 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 19th day of June, 2024.

(Signature)
Edward L. Scott
General Manager, Transmission Planning

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 19th day of June, 2024 by Edward L. Scott. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.

(Signature)

Monique Hampton
(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF _____

MONIQUE HAMPTOM
MY COMMISSION # HH 368082
EXPIRES: June 28, 2027

(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 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 Florida Rising and League of United Latin American Citizens' (together, "LULAC") First Request for Production of Documents, Question 2 (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 LULAC's First Request for Production of Documents, Question 2 (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.

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.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 17 day of June, 2024.

(Signature)
Brian M. Lloyd
General Manager, Florida Major Projects
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 17 day of June, 2024 by Brian M. Lloyd. He is personally known to me or has produced her Florida driver's license, or his _____ as identification.

SHEMONE WATTS
Notary Public - State of Florida
Commission # HH 259961
My Comm. Expires Jun 17, 2026

(AFFIX NOTARIAL SEAL)

(Signature)

Shemone Watts
(Printed Name)

NOTARY PUBLIC, STATE OF Florida

6/17/2026
(Commission Expiration Date)

HH 259961
(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 28, 2024

AFFIDAVIT OF JOHN R. PANIZZA 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 John R. Panizza, who being first duly sworn, on oath deposes and says that:

1. My name is John R. Panizza. 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, Tax Operations. DEBS provides various administrative and other services to DEF and other affiliated companies of Duke Energy Corporation.

3. As Director, Tax Operations, I have overall responsibility for corporate tax compliance and accounting for Duke Energy and therefore its subsidiary DEF. The Duke Energy Tax Operations Department is responsible for maintaining and reconciling Duke Energy's tax

accounts and for the reporting and disclosure of tax-related matters.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Seventh Set of Interrogatories, Questions 206-208. 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.

5. Documents produced in response to OPC's Seventh Set of Interrogatories, Questions 206-208, contain confidential information. Specifically, those documents contain internal sensitive business information relating to DEF's actual and estimated property tax rates. 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)
John R. Panizza
Director, Tax Operations
Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this ___ day of _____, 2024 by John R. Panizza. He is personally known to me or has produced his _____ driver's license, or his _____ 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: May 24, 2024

AFFIDAVIT OF LESLEY G. QUICK 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 Lesley G. Quick, who being first duly sworn, on oath deposes and says that:

1. My name is Lesley G. Quick. 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 Vice President of Customer Advocacy, Regulatory Engagement and Support within Customer Services for Duke Energy Corporation, including Duke Energy Florida ("DEF" or the "Company").

3. My responsibilities as Vice President, Customer Advocacy include the oversight,

leadership, integration, and implementation of strategic business planning governance, change management, audit and compliance requirements, customer technology support, digital experience transformation, and enhanced customer communications. I provide direction and leadership in the development of organizational business plans to ensure alignment and achievement of objectives, regulatory compliance and reporting, key performance indicators, and operational metrics. Additionally, I lead the Customer Advocacy division. Customer Advocacy is responsible for enhancing support for our customers by expanding outreach with local, state, and federal agency partners to improve access to assistance funding.

4. DEF is seeking confidential classification for information contained in response to Florida Rising and League of United Latin American Citizens' (together, "LULAC") First Request for Production of Documents, Question 2 (Customer). 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 LULAC's First Request for Production of Documents, Question 2 (Customer), 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 29 day of 5, 2024.

(Signature)
Lesley G. Quick
Vice President, Customer Advocacy
Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 29th day of May, 2024 by Lesley G. Quick. She is personally known to me or has produced her _____ driver's license, or her _____ as identification.

(Signature)
Teresa Ray
(Printed Name)
NOTARY PUBLIC, STATE OF NC
01/21/29
(Commission Expiration Date)

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

TERESA RAY
My Commission Expires
NOTARY
PUBLIC
01-21-29
UNION COUNTY, NC