



Dianne M. Triplett  
DEPUTY GENERAL COUNSEL

June 26, 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 OPC's Late Filed Exhibit Requests for Witness Goff, Borsch, Jacob, and Olivier. 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 Vanessa Goff, Marcia Olivier, Benjamin Borsch, and Hans Jacob)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on June 5, 2024, June 7, 2024, June 11, 2024, and June 13, 2024, respectively, 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/mh  
Attachments

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20240025-EI

Dated: June 26, 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 for certain information contained in its Response to Late Filed Exhibit Request for Benjamin Borsch (Question 2), Response to Late Filed Exhibit Request for Marcia Olivier (Question 8), Response to Late Filed Exhibit Request for Vanessa Goff (Questions 2, 5, and 6), and Response to Late Filed Exhibit Request for Hans Jacob (Question 3), filed in the above referenced docket.<sup>1</sup> This Request is timely. *See* Rule 25-22.006(3)(1)1, E.A.C. In support of this Request, DEF states:

1. Information contained in DEF’s Response to Late Filed Exhibit Request for Benjamin Borsch (Question 2), Response to Late Filed Exhibit Request for Marcia Olivier (Question 8), Response to Late Filed Exhibit Request for Vanessa Goff (Questions 2, 5, and 6), and Response to Late Filed Exhibit Request for Hans Jacob (Question 3), contain information that is “confidential proprietary business information” under Section 366.093(3), F.S.

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<sup>1</sup> Response to Late Filed Exhibit Request for Vanessa Goff (Questions 2 and 6) was filed June 5, 2024. Response to Late Filed Exhibit Request for Benjamin Borsch (Question 2) and Response to Late Filed Exhibit Request for Hans Jacob (Question 3) were filed June 7, 2024. Response to Late Filed Exhibit Request for Marcia Olivier (Question 8) was filed June 11, 2024. Response to Late Filed Exhibit Request for Vanessa Goff (Question 5) was filed June 13, 2024.

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 the dates indicated in Footnote 1 above. 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 Olivier, Vanessa Goff, Hans Jacob, and Benjamin Borsch, attesting to the confidential nature of information identified in Exhibit C.

3. As indicated in Exhibits C and D, the information for which DEF requests confidential classification is “proprietary confidential business information” within the meaning of Section 366.093(3), F.S. Specifically:

(a) The confidential information contained in DEF’s Response to Late Filed Exhibit Request for Vanessa Goff, Question 2, includes pricing information relating to lease agreements. In addition, documents produced in DEF’s Response to Late Filed Exhibit Request for Vanessa Goff, Question 6, contain confidential information relating to DEF’s costs with respect to its planned solar design optimization. The above information relates to DEF’s competitive business interests, and, absent confidential classification, disclosure of that information would

impair DEF's ability to compete in the marketplace.

(b) The confidential information contained in DEF's Response to Late Filed Exhibit Request for Vanessa Goff, Question 5, includes terms of 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's efforts to contract for goods and services on favorable terms may be impaired.

(c) The confidential information contained in DEF's Response to Late Filed Exhibit Request for Hans Jacob, Question 3, includes costs associated with future generation and transmission projects, as well as DEF's generation and transmission strategy. That information is proprietary and relates to DEF's competitive business interests. Thus, absent confidential classification, disclosure of that information would impair DEF's ability to compete in the marketplace.

(d) The confidential information contained in DEF's Response to Late Filed Exhibit Request for Marcia Olivier, Question 8, includes internal sensitive business information regarding DEF's current and projected pension costs. That information relates to DEF's competitive business interests, and, absent confidential classification, its disclosure would impair DEF's ability to compete in the marketplace.

(e) The confidential information contained in DEF's Response to Late Filed Exhibit Request for Benjamin Borsch, Question 2, includes detailed information about the nature, capacity, and cost effectiveness of DEF stations and/or units. That 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 as Exhibit "A" 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 26th day of June, 2024.

*/s/Dianne M. Triplett*

**DIANNE TRIPLETT**

Deputy General Counsel

299 1st Avenue North

St. Petersburg, Florida 33701

T: (727) 820-4692

E: [dianne.triplett@duke-energy.com](mailto:dianne.triplett@duke-energy.com)

**MATTHEW R. BERNIER**

Associate General Counsel

106 East College Avenue, Suite 800

Tallahassee, Florida 32301

T: (850) 521-1428

E: [matt.bernier@duke-energy.com](mailto:matt.bernier@duke-energy.com)

**STEPHANIE A. CUELLO**

Senior Counsel

106 East College Avenue, Suite 800

Tallahassee, Florida 32301

T: (850) 521-1425

E: [stephanie.cuello@duke-energy.com](mailto:stephanie.cuello@duke-energy.com)

[FLRegulatoryLegal@duke-energy.com](mailto:FLRegulatoryLegal@duke-energy.com)

*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 26th day of June, 2024.

/s/ Dianne M. Triplett  
Attorney

Jennifer Crawford / Major Thompson /  
Shaw Stiller  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[JCrawfor@psc.state.fl.us](mailto:JCrawfor@psc.state.fl.us)  
[MThompso@psc.state.fl.us](mailto:MThompso@psc.state.fl.us)  
[SStiller@psc.state.fl.us](mailto:SStiller@psc.state.fl.us)  
[discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us)

Jon C. Moyle, Jr. / Karen A. Putnal  
Moyle Law Firm, P.A.  
FIPUG  
118 North Gadsden Street  
Tallahassee, Florida 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)

Tony Mendoza / Patrick Woolsey  
Sierra Club  
2101 Webster Street Suite 1300  
Oakland, CA 94612  
[tony.mendoza@sierraclub.org](mailto:tony.mendoza@sierraclub.org)  
[patrick.woolsey@sierraclub.org](mailto:patrick.woolsey@sierraclub.org)

Sari Amiel  
Sierra Club  
50 F St. NW, Eighth Floor  
Washington, DC 20001  
[sari.amiel@sierraclub.org](mailto:sari.amiel@sierraclub.org)

Walt Trierweiler / Charles J. Rehwinkel /  
Mary Wessling / Austin Watrous  
Office of Public Counsel  
111 W. Madison St., Rm 812  
Tallahassee, FL 32399  
[rehwinkel.charles@leg.state.fl.us](mailto:rehwinkel.charles@leg.state.fl.us)  
[trierweiler.walt@leg.state.fl.us](mailto:trierweiler.walt@leg.state.fl.us)  
[watrous.austin@leg.state.fl.us](mailto:watrous.austin@leg.state.fl.us)  
[wessling.mary@leg.state.fl.us](mailto:wessling.mary@leg.state.fl.us)

Bradley Marshall / Jordan Luebkekmann /  
Hema Lochan  
Earthjustice  
LULAC & FL Rising  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, Florida 32301  
[bmarshall@earthjustice.org](mailto:bmarshall@earthjustice.org)  
[jluebkekmann@earthjustice.org](mailto:jluebkekmann@earthjustice.org)  
[hlochan@earthjustice.org](mailto:hlochan@earthjustice.org)  
[flcaseupdates@earthjustice.org](mailto:flcaseupdates@earthjustice.org)

Robert Scheffel Wright / John T. LaVia,  
III  
Gardner, Bist, Bowden, Dee, LaVia,  
Wright, Perry & Harper, P.A.  
Florida Retail Federation  
1300 Thomaswood Drive  
Tallahassee, Florida 32308  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)  
[jlavia@gbwlegal.com](mailto:jlavia@gbwlegal.com)

Peter J. Mattheis / Michael K. Lavanga /  
Joseph R. Briscar  
Stone Mattheis Xenopoulos & Brew, PC  
NUCOR  
1025 Thomas Jefferson Street, NW  
Suite 800 West  
Washington, DC 20007-5201  
[pjm@smxblaw.com](mailto:pjm@smxblaw.com)  
[mkl@smxblaw.com](mailto:mkl@smxblaw.com)  
[jrb@smxblaw.com](mailto:jrb@smxblaw.com)

James W. Brew / Laura Wynn Baker /  
Sarah B. Newman  
Stone Mattheis Xenopoulos & Brew, PC  
PCS Phosphate-White Springs  
1025 Thomas Jefferson Street, NW  
Suite 800 West  
Washington, DC 20007-5201  
[jbrew@smxblaw.com](mailto:jbrew@smxblaw.com)  
[lwb@smxblaw.com](mailto:lwb@smxblaw.com)  
[sbn@smxblaw.com](mailto:sbn@smxblaw.com)

William C. Garner  
Law Office of William C. Garner, PLLC  
SACE  
3425 Bannerman Road  
Unit 105, No. 414  
Tallahassee, FL 32312  
[bgarner@wgcglawoffice.com](mailto:bgarner@wgcglawoffice.com)

Nikhil Vijaykar  
Keyes & Fox LLP  
EVgo Services, LLC  
580 California St., 12th Floor  
San Francisco, CA 94104  
[nvijaykar@keyesfox.com](mailto:nvijaykar@keyesfox.com)

Lindsey Stegall  
EVgo Services, LLC  
11835 W. Olympic Blvd., Ste. 900E  
Los Angeles, CA 90064  
[Lindsey.Stegall@evgo.com](mailto:Lindsey.Stegall@evgo.com)

Frederick L. Aschauer, Jr., Esq.  
Allan J. Charles, Esq.  
Lori Killinger, Esq.  
Lewis, Longman & Walker P.A.  
AAACE / Circle K / RaceTrac / Wawa  
106 East College Avenue, Suite 1500  
Tallahassee, Florida 32301  
[fAschauer@llw-law.com](mailto:fAschauer@llw-law.com)  
[acharles@llw-law.com](mailto:acharles@llw-law.com)  
[killinger@llw-law.com](mailto:killinger@llw-law.com)  
[jmelchior@llw-law.com](mailto:jmelchior@llw-law.com)

# **Exhibit A**

**“CONFIDENTIAL”**

**(filed under separate cover on the dates indicated in  
Footnote 1)**



# **Exhibit B**

**REDACTED**

**(copy-one)**

DEF's Response to Late Filed Exhibit Request  
Q2  
Witness: Goff

REDACTED  
DOCUMENTS BEARING BATES NUMBERS  
20240025-LFEGOFF-00000031 through 20240025-LFEGOFF-  
00000141  
ARE REDACTED IN THEIR ENTIRETY

**REDACTED**  
**DOCUMENTS BEARING BATES NUMBERS**  
**20240025-LFEGOFF-00000810 THROUGH**  
**20240025-LFEGOFF-00000814 ARE REDACTED**  
**IN THEIR ENTIRETY**

DEF's Response to Late Filed Exhibit Request

Q6

Witness: Goff

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Duke Energy  
Fiscal 2023 - Fiscal 2027 Budgets  
Summary Allocations  
January 2023 Refresh

TOTAL QUALIFIED PENSION <sup>1</sup>						
2022 Actual	2023 Budget	2024 Budget	2025 Budget	2026 Budget	2027 Budget	
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[REDACTED]						
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[REDACTED]

Duke Energy Business Services 110  
- Service Cost  
- Other  
- Rate Regulated Settlement Adjustment  
- Total Net Periodic Benefit Cost

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

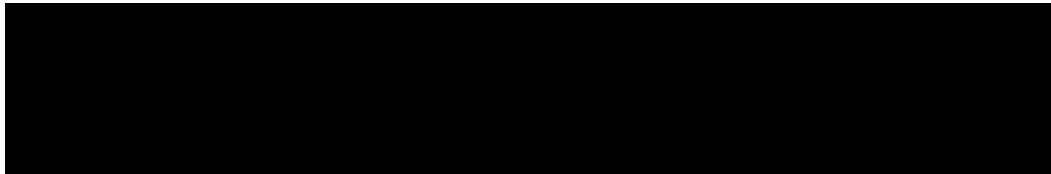
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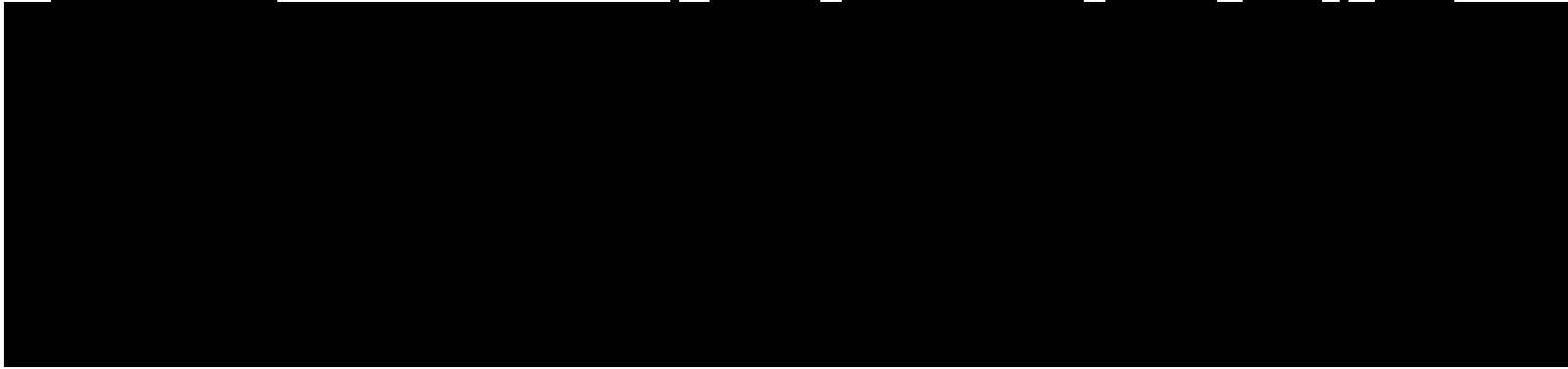
Duke Energy  
Fiscal 2023 - Fiscal 2027 Budgets  
Summary Allocations  
January 2023 Refresh

TOTAL QUALIFIED PENSION <sup>1</sup>						
2022	2023	2024	2025	2026	2027	

- Duke Energy Florida
- Service Cost
- Other
- Rate Regulated Settlement Adjustment
- Total Net Periodic Benefit Cost



[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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Duke Energy  
 Fiscal 2024 - Fiscal 2028 Budgets  
 Summary Allocations  
 2023 Budgets - November Refresh

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Duke Energy Business Services	110
- Service Cost	[REDACTED]
- Other	[REDACTED]
- Rate Regulated Settlement Adjustment	[REDACTED]
- Total Net Periodic Benefit Cost	[REDACTED]
[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]

TOTAL QUALIFIED PENSION <sup>1</sup>					
2023 Actual	2024 Budget	2025 Budget	2026 Budget	2027 Budget	2028 Budget
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Duke Energy  
Fiscal 2024 - Fiscal 2028 Budgets  
Summary Allocations  
2023 Budgets - November Refresh

Duke Energy Florida  
- Service Cost  
- Other  
- Rate Regulated Settlement Adjustment  
- Total Net Periodic Benefit Cost

802

TOTAL QUALIFIED PENSION <sup>1</sup>					
2023 Actual	2024 Budget	2025 Budget	2026 Budget	2027 Budget	2028 Budget

[REDACTED]					
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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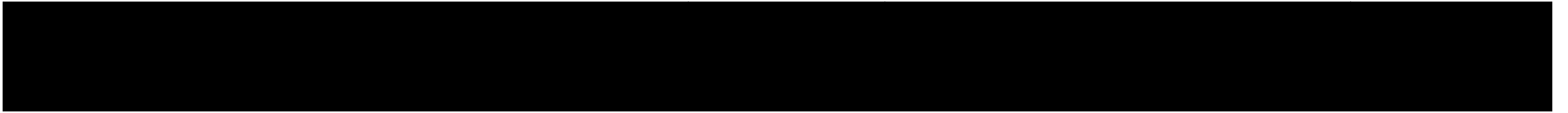


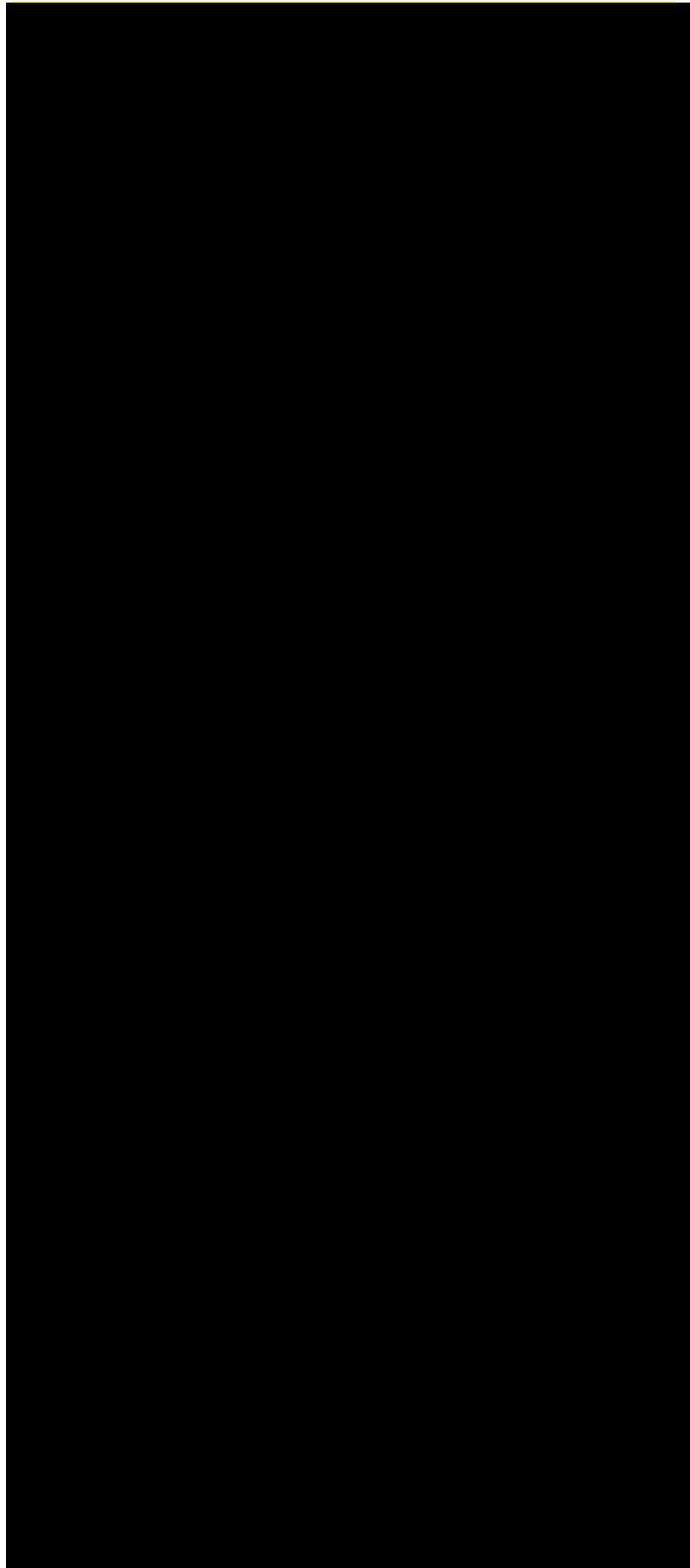
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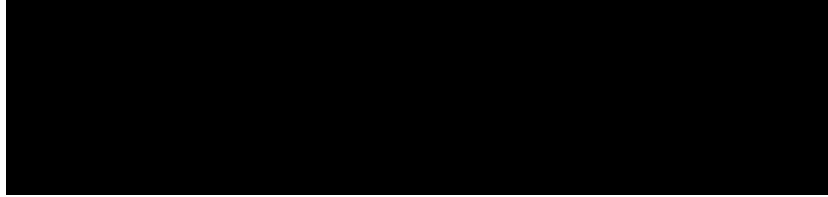
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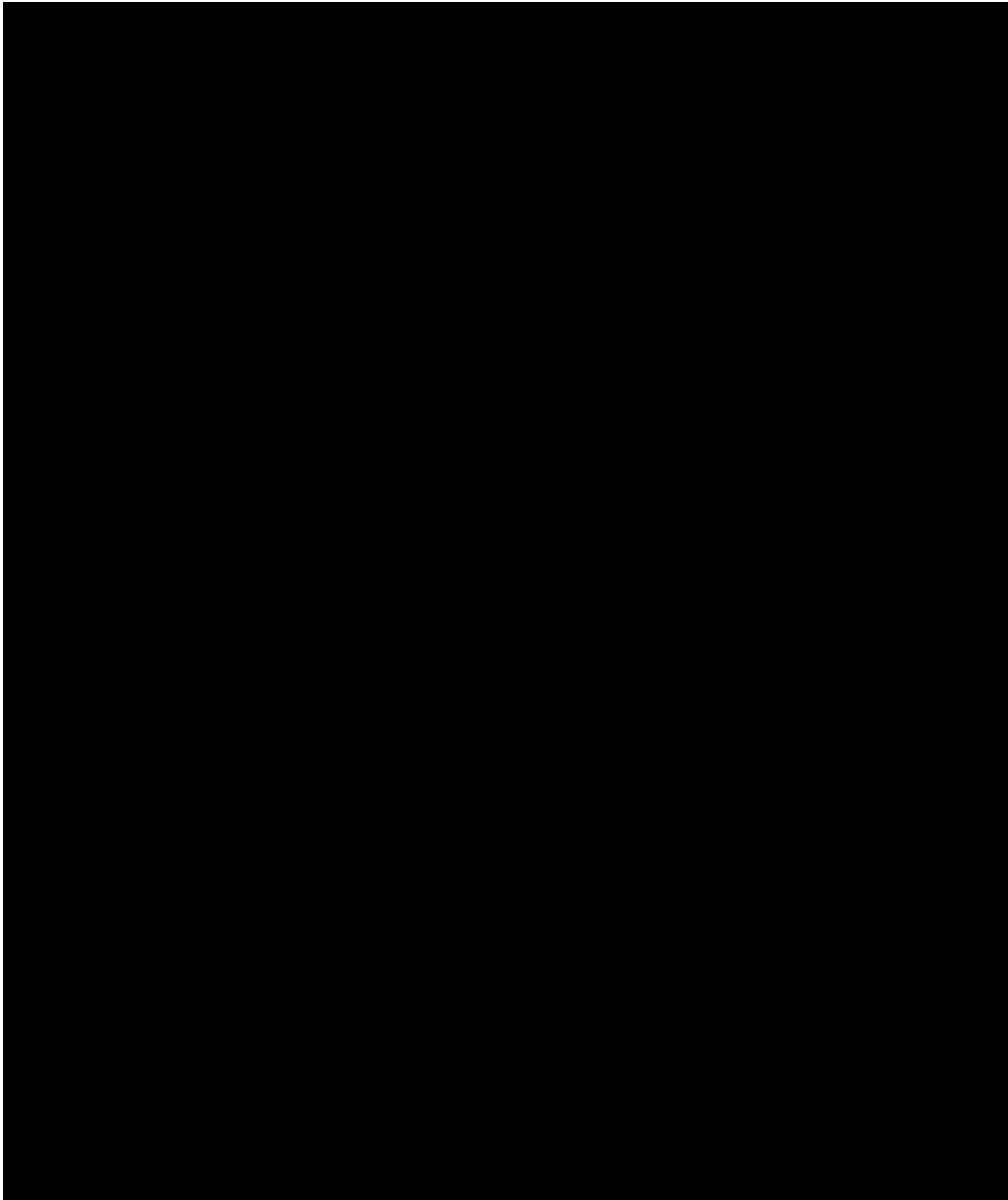
ARE REDACTED IN THEIR ENTIRETY

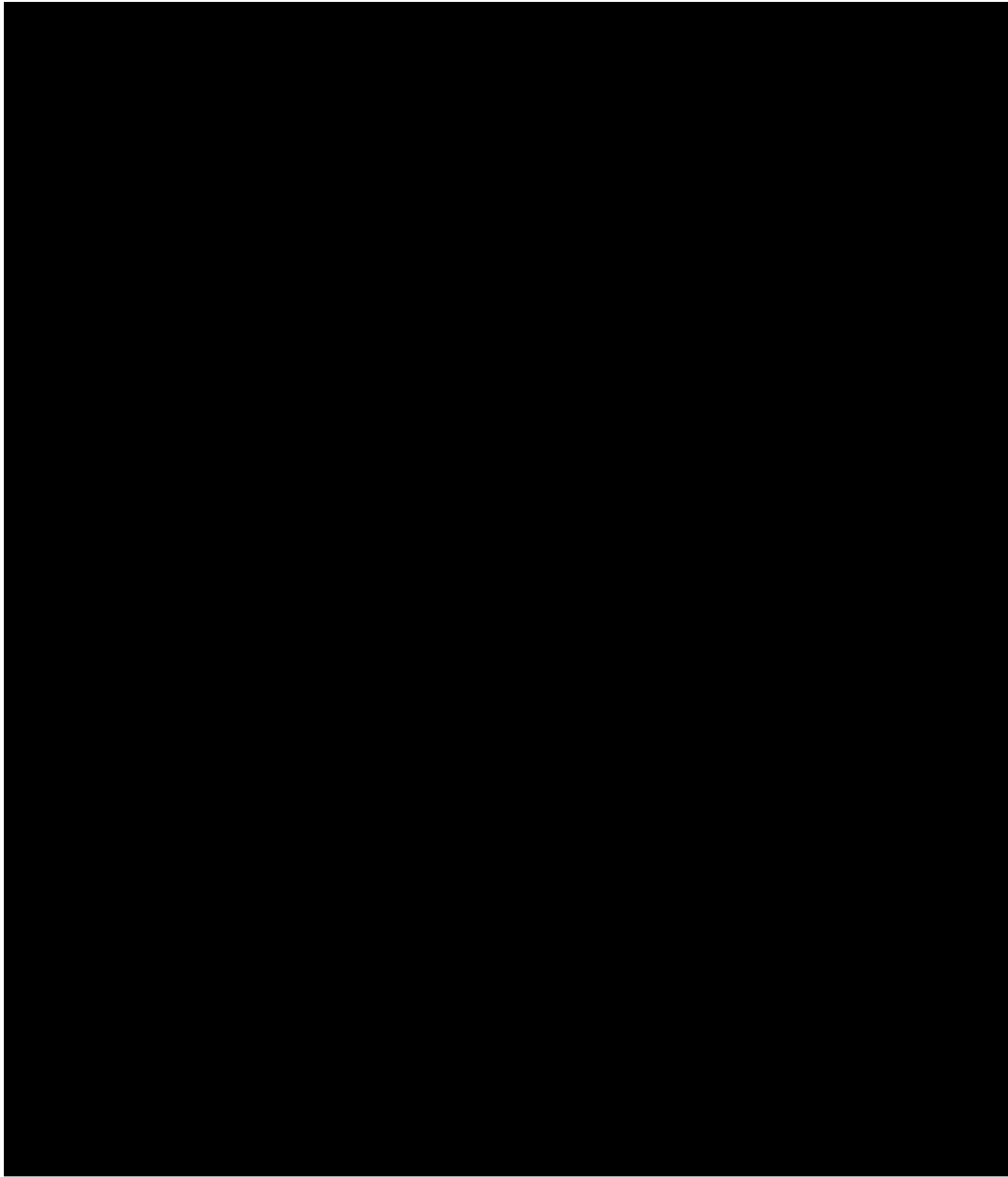


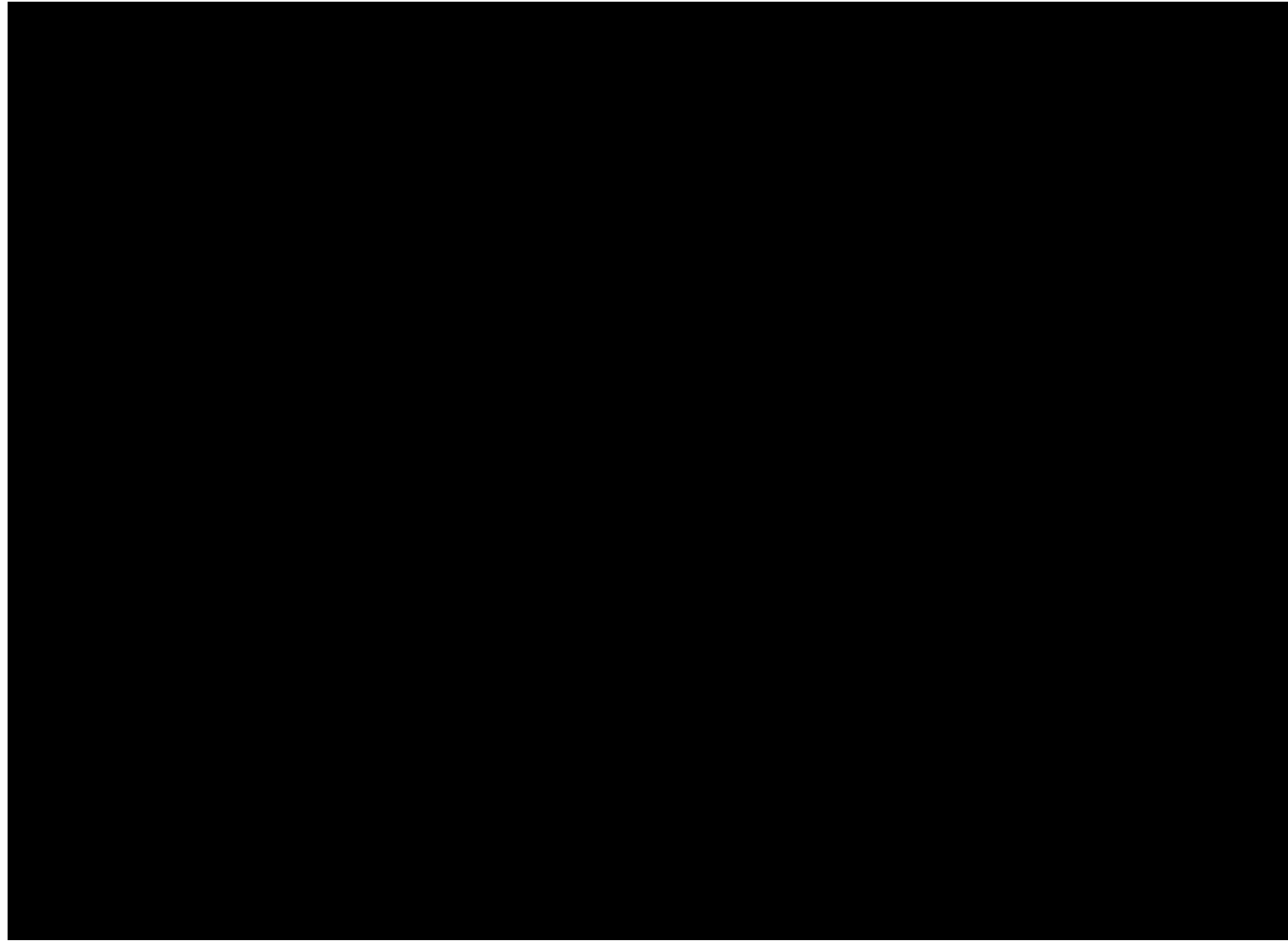














# **Exhibit B**

**REDACTED**

**(copy-two)**

DEF's Response to Late Filed Exhibit Request

Q2

Witness: Goff

REDACTED

DOCUMENTS BEARING BATES NUMBERS

20240025-LFEGOFF-00000031 through 20240025-LFEGOFF-  
00000141

ARE REDACTED IN THEIR ENTIRETY

**REDACTED**  
**DOCUMENTS BEARING BATES NUMBERS**  
**20240025-LFEGOFF-00000810 THROUGH**  
**20240025-LFEGOFF-00000814 ARE REDACTED**  
**IN THEIR ENTIRETY**

DEF's Response to Late Filed Exhibit Request

Q6

Witness: Goff

REDACTED  
DOCUMENTS BEARING BATES NUMBERS  
20240025-LFEGOFF-00000142 through 20240025-LFEGOFF-  
00000149  
ARE REDACTED IN THEIR ENTIRETY

Duke Energy  
Fiscal 2023 - Fiscal 2027 Budgets  
Summary Allocations  
January 2023 Refresh

TOTAL QUALIFIED PENSION'					
2022	2023	2024	2025	2026	2027
Actual	Budget	Budget	Budget	Budget	Budget

[Redacted]

Duke Energy Business Services 110

- Service Cost
- Other
- Rate Regulated Settlement Adjustment
- Total Net Periodic Benefit Cost

[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
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[Redacted]

[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
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[Redacted]

[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
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**Duke Energy  
Fiscal 2023 - Fiscal 2027 Budgets  
Summary Allocations  
January 2023 Refresh**

TOTAL QUALIFIED PENSION						
2022	2023	2024	2025	2026	2027	

- Duke Energy Florida
- Service Cost
- Other
- Rate Regulated Settlement Adjustment
- Total Net Periodic Benefit Cost



[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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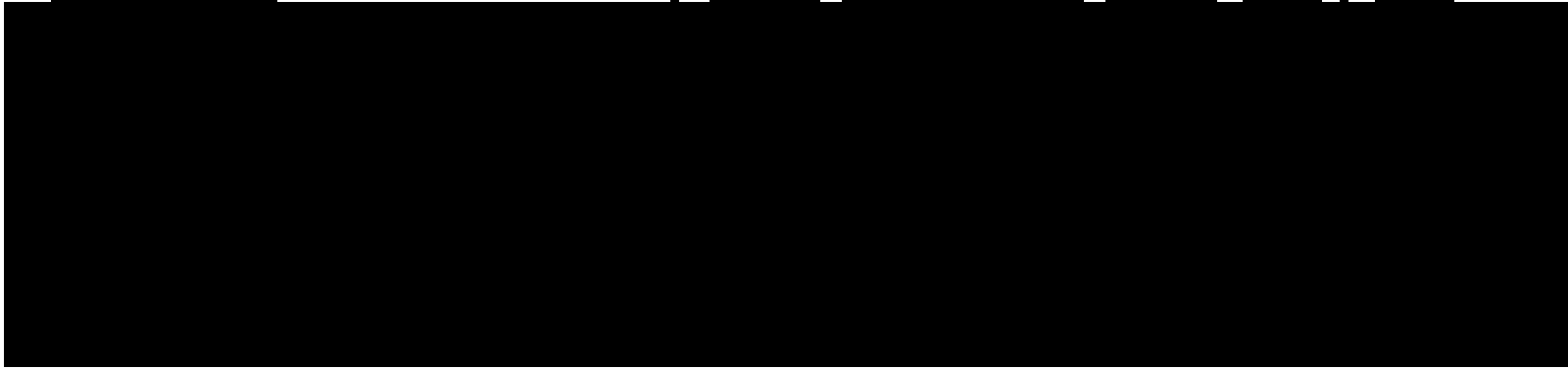
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[REDACTED]

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Duke Energy  
 Fiscal 2024 - Fiscal 2028 Budgets  
 Summary Allocations  
 2023 Budgets - November Refresh

[Redacted]

Duke Energy Business Services  
 - Service Cost  
 - Other  
 - Rate Regulated Settlement Adjustment  
 - Total Net Periodic Benefit Cost

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

110

TOTAL QUALIFIED PENSION <sup>1</sup>					
2023 Actual	2024 Budget	2025 Budget	2026 Budget	2027 Budget	2028 Budget
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Duke Energy  
Fiscal 2024 - Fiscal 2028 Budgets  
Summary Allocations  
2023 Budgets - November Refresh

Duke Energy Florida  
- Service Cost  
- Other  
- Rate Regulated Settlement Adjustment  
- Total Net Periodic Benefit Cost

802

TOTAL QUALIFIED PENSION <sup>1</sup>					
2023 Actual	2024 Budget	2025 Budget	2026 Budget	2027 Budget	2028 Budget

[REDACTED]					
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]					
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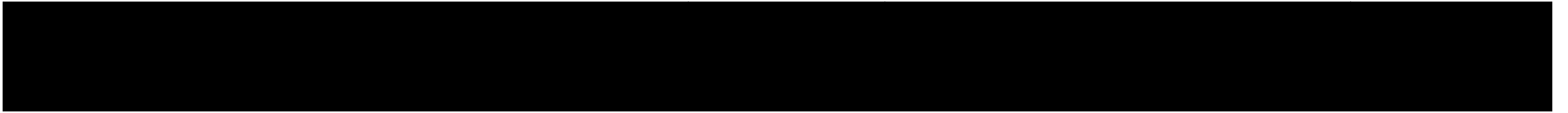


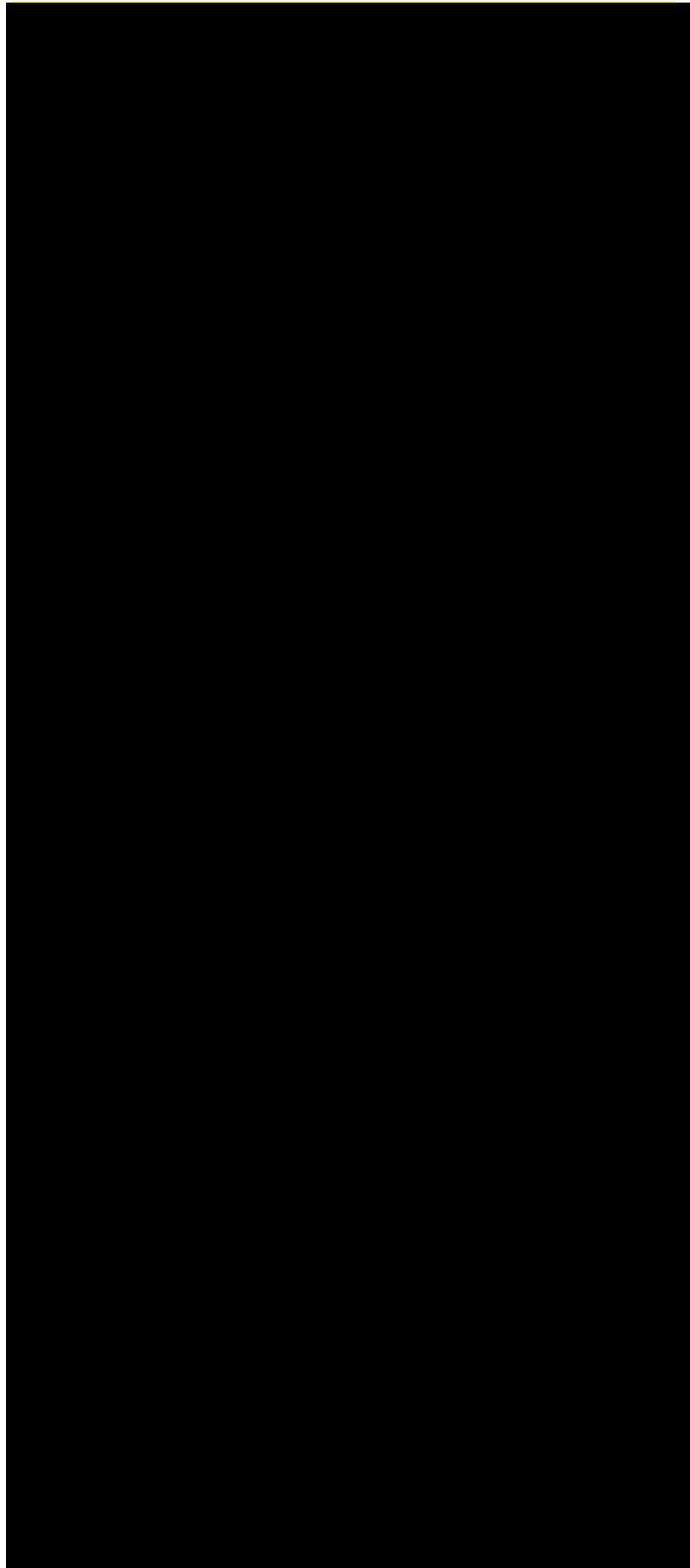
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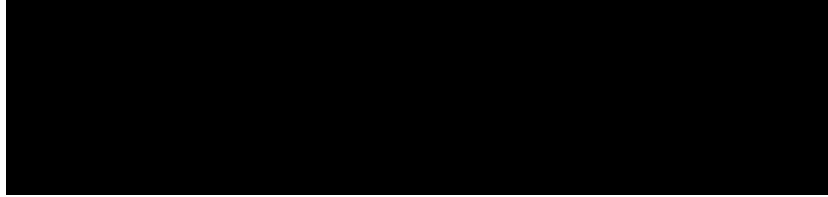
DOCUMENTS BEARING BATES NUMBERS 20240025-LFEJACOB-  
00000798 through 20240026-LFEJACOB-00000805

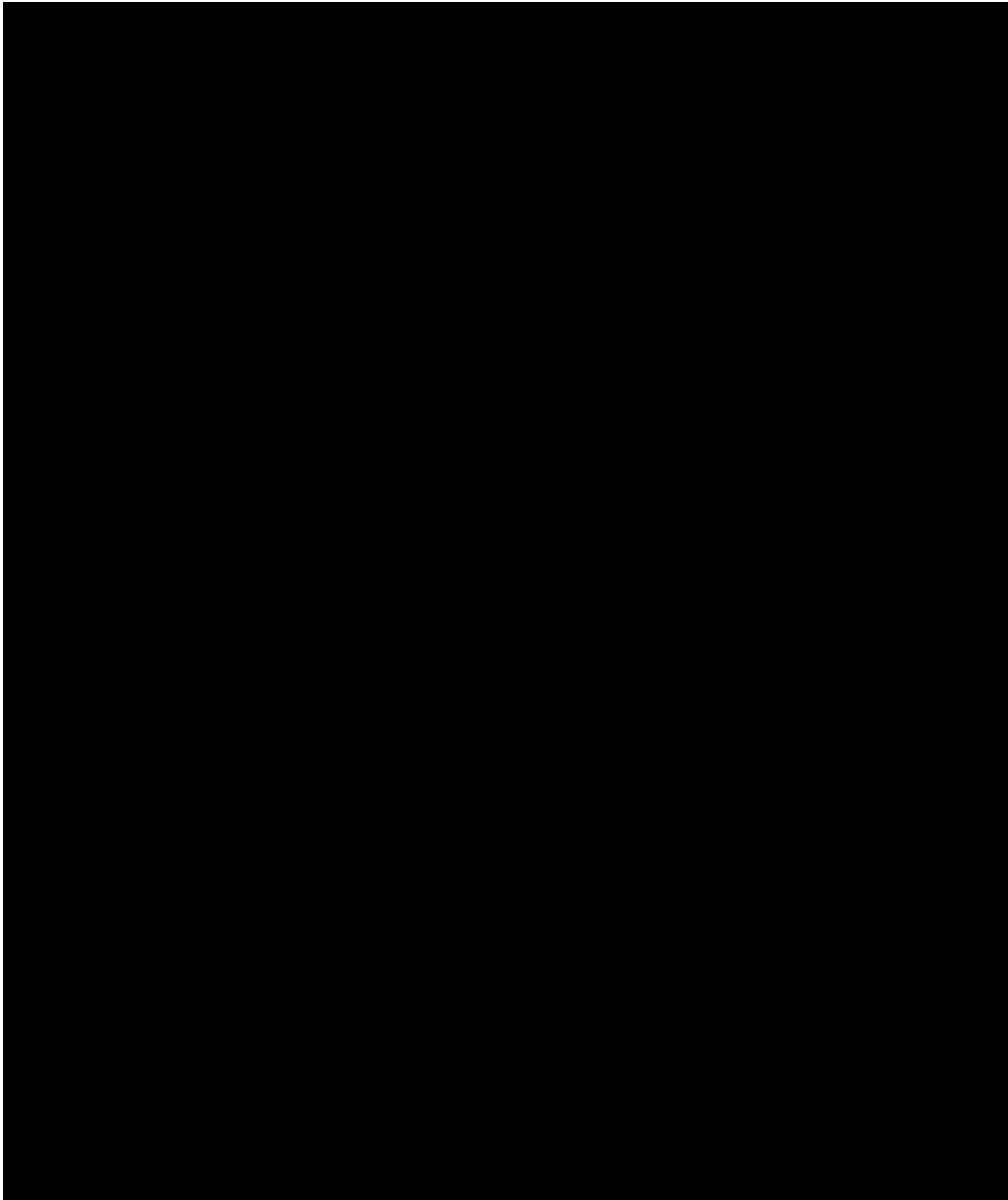
ARE REDACTED IN THEIR ENTIRETY

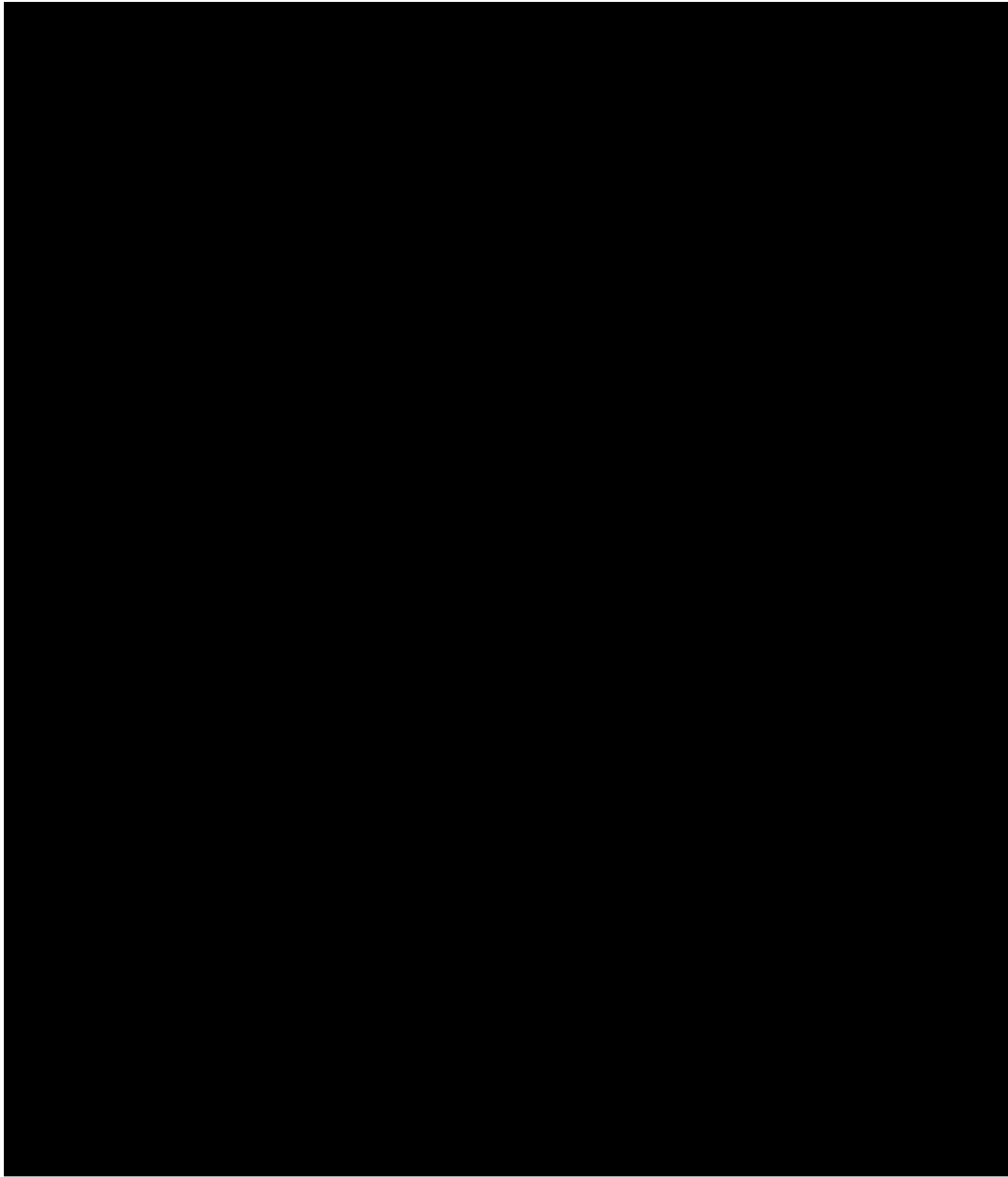


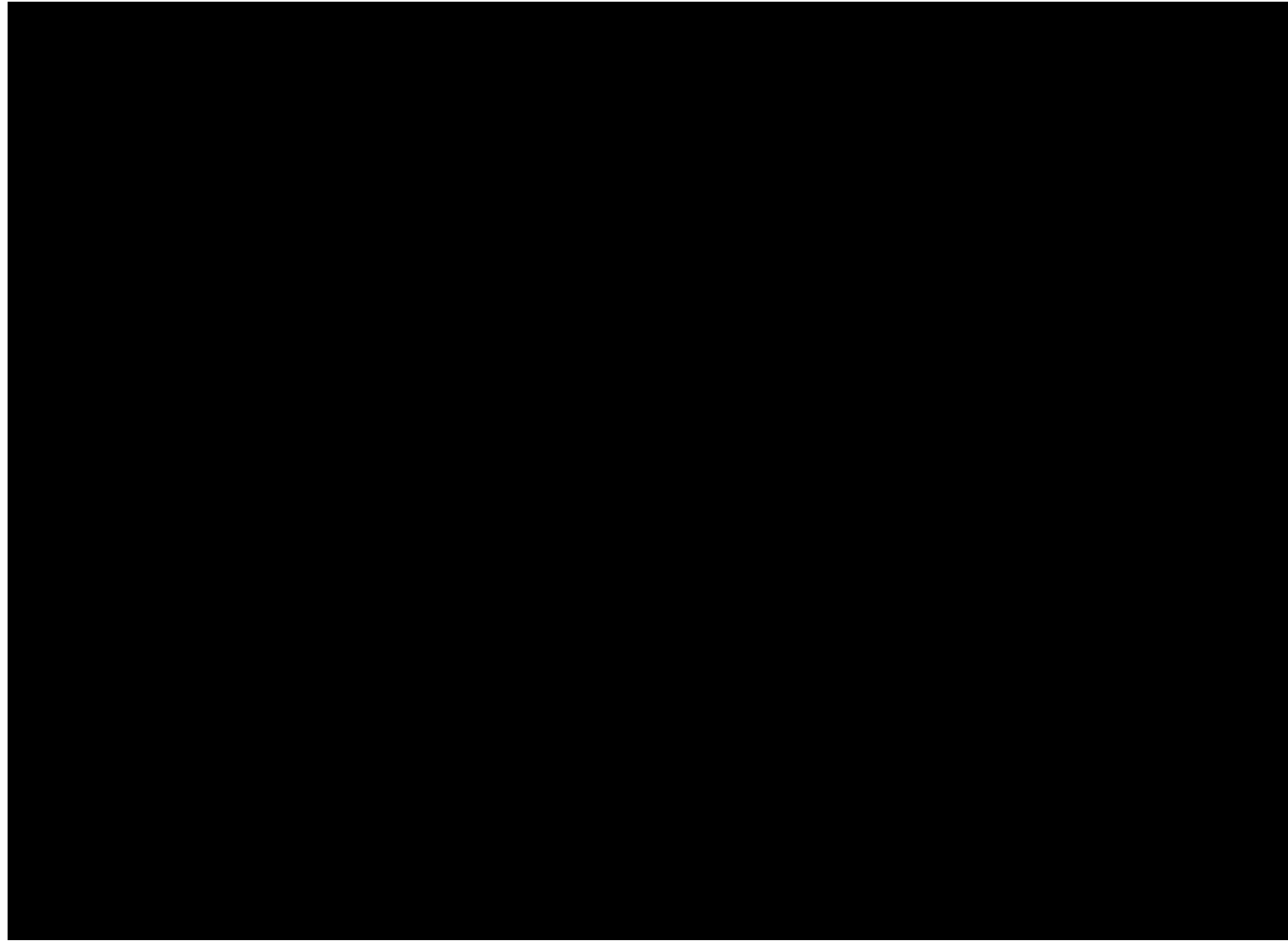














# Exhibit C

## DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
Response to Late Filed Exhibit Request for Vanessa Goff, Question 2.	<b>Question 2:</b> Documents bearing bates numbers 20240025-LFEGOFF-00000031 through 20240025-LFEGOFF-00000141 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.
Response to Late Filed Exhibit Request for Vanessa Goff, Question 5.	<b>Question 5:</b> Documents bearing bates numbers 20240025-LFEGOFF-00000810 through 20240025-LFEGOFF-00000814 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.
Response to Late Filed Exhibit Request for Vanessa Goff, Question 6.	<b>Question 6:</b> Documents bearing bates numbers 20240025-LFEGOFF-00000142 through 20240025-LFEGOFF-00000149 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.
Response to Late Filed Exhibit Request for Hans Jacob, Question 3.	<b>Question 3:</b> Documents bearing bates numbers 20240025-LFEJACOB-00000798 through 20240025-LFEJACOB-00000805 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.

<p>Response to Late Filed Exhibit Request for Marcia Olivier, Question 7.</p>	<p><b>Question 7:</b> Documents baring bates numbers 20240025-LFEOLIVIER-00000806 through 20240025-LFEOLIVIER-00000809 are confidential in their entirety.</p>	<p>§366.093(3)(e), F.S. The documents in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>Response to Late Filed Exhibit Request for Benjamin Borsch, Question 2.</p>	<p><b>Question 2:</b> Documents baring bates numbers 20240025-LFEBORSCH-00000229 through 20240025-LFEBORSCG-00000793 are confidential in their entirety.</p>	<p>§366.093(3)(e), F.S. The documents in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

# **Exhibit D**

## **AFFIDAVITS OF VANESSA GOFF, HANS JACOB, MARCIA OLIVIER, AND BENJAMIN BORSCH**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20240025-EI

Dated: June 26, 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 DEF. 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 its Response to Late Filed Exhibit Request for Hans Jacob, specifically, Question 3. 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 DEF's Response to Late Filed Exhibit Request for Hans Jacob, specifically, Question 3, contain confidential information. Specifically, these documents contain costs associated with future generation and transmission projects, as well as DEF's generation and transmission strategy. That information is proprietary and relates to DEF's competitive business interests. Thus, 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 25<sup>th</sup> day of June, 2024.

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

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 25<sup>th</sup> day of June, 2024 by Hans Jacob. He is personally known to me or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.

[Signature]  
(Signature)  
Monique Hampton  
(Printed Name)

(AFFIX NOTARIAL SEAL)



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

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

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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20240025-EI

Dated: June 26, 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 its Response

to Late Filed Exhibit Request for Marcia Olivier, specifically, Question 8. 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.

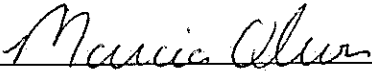
5. Documents produced in DEF's Response to Late Filed Exhibit Request for Marcia Olivier, specifically, Question 8, contain confidential information. Specifically, those documents contain internal sensitive business information regarding DEF's current and projected pension costs. That information relates to DEF's competitive business interests, and, absent confidential classification, its disclosure would impair DEF's ability to compete in the marketplace.

6. Upon receipt of confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 25<sup>th</sup> day of June, 2024.

  
\_\_\_\_\_  
(Signature)  
Marcia J. Olivier  
Director, Rates and Regulatory Planning  
Duke Energy Florida, LLC



THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 2<sup>nd</sup> day of June, 2024 by Marcia J. Olivier. She is personally known to me or has produced her \_\_\_\_\_ driver's license, or her \_\_\_\_\_ as identification.

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

Monique Hampton  
(Printed Name)

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

(AFFIX NOTARIAL SEAL)



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

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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20240025-EI

Dated: June 26, 2024

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

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

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

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

1. My name is Vanessa Goff. I am over the age of 18 years old, and I have been authorized by Duke Energy Florida (hereinafter "DEF" or the "Company") to give this affidavit in the above-styled proceeding on DEF's behalf and in support of DEF's Request for Confidential Classification (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am employed by Duke Energy Corporation as Director of Renewables Business Development.

3. As Director of Renewables Development, I am responsible for the development of new solar facilities in Florida on behalf of DEF. I lead a team that conducts solar development activities, including project siting, land acquisition, resource assessment, permitting, obtaining

interconnection rights, project layout and design, arranging contracts for engineering, procurement, and construction (“EPC”) services, as well as originating, structuring, and executing transactions to acquire rights to existing solar development projects.

4. DEF is seeking confidential classification for information contained in its Response to Late Filed Exhibit Request for Vanessa Goff, specifically, Questions 2, 5, and 6. 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 DEF’s Response to Late Filed Exhibit Request for Vanessa Goff, specifically, Question 2, contain confidential information. Specifically, these documents contain pricing information relating to lease agreements. In addition, documents produced in DEF’s Response to Late Filed Exhibit Request for Vanessa Goff, specifically, Question 6, contain confidential information relating to DEF’s costs with respect to its planned solar design optimization. The above 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. Documents produced in DEF’s Response to Late Filed Exhibit Request for Vanessa Goff, specifically, Question 5, contain confidential information. Specifically, these documents contain information relating to terms of 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’s 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 \_\_\_\_ 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)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20240025-EI

Dated: June 26, 2024

**AFFIDAVIT OF BENJAMIN H. BORSCH 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 Benjamin H. Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin H. Borsch. 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 Managing Director of Integrated Resource Planning and Analytics.

3. As Managing Director of Integrated Resource Planning and Analytics, I am responsible for directing the resource planning process for DEF in an integrated approach in order to find the most cost-effective alternatives to meet DEF's obligation to serve its customers in

Florida. In this capacity, I oversee numerous studies to evaluate the system impact and cost effectiveness of various proposed and alternative generation projects. I oversee the completion of DEF's Ten-Year Site Plan ("TYSP") filed each April.

4. DEF is seeking confidential classification for information contained in its Response to Late Filed Exhibit Request for Benjamin Borsch, specifically, Question 2. 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 pursuant to DEF's Response to Late Filed Exhibit Request for Benjamin Borsch, specifically, Question 2, contain confidential information. Specifically, those documents contain detailed information about the nature, capacity, and cost effectiveness of DEF stations and/or units. That 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.

7. This concludes my affidavit.

Further affiant sayeth not.

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

\_\_\_\_\_  
(Signature)  
Benjamin H. Borsch  
Managing Director, Integrated Resource Planning  
and Analytics  
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this \_\_\_\_ day of \_\_\_\_\_, 2024 by Benjamin H. Borsch. He is personally known to me or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.

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

(AFFIX NOTARIAL SEAL)

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

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

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