

Dianne M. Triplett DEPUTY GENERAL COUNSEL

June 28, 2024

#### VIA ELECTRONIC MAIL

Mr. Adam J. Teitzman, Commission Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket 20240025-EI, Petition for Rate Increase by Duke Energy Florida, LLC

Dear Mr. Teitzman,

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF'), DEF's Request for Confidential Classification for certain information provided in its Response to Sierra Club's First Set of Interrogatories (Nos. 1-38) and First Request for Production of Documents (Nos. 1-13). 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 Reginald Anderson and Benjamin Borsch)

DEF's confidential Exhibit A that accompanies the above-referenced was previously submitted with DEF's Notice of Intent to Request Confidential Classification, 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 28, 2024

#### DUKE ENERGY FLORIDA, LLC'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Duke Energy Florida, LLC ("DEF" or "Company"), pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), submits this Request for Confidential Classification ("Request") for certain information contained in its Response to Sierra Club's First Set of Interrogatories (Nos. 1-38) and First Request for Production of Documents (Nos. 1-13). In support of this Request, DEF states:

1. Documents responsive to Sierra Club's First Set of Interrogatories of Documents, specifically, Question 11 and 17 and Sierra Club's First Request for Production of Documents, specifically 7 and 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". In the unredacted versions, the information asserted to be confidential is highlighted in yellow.

(b) Composite Exhibit B is a package containing two copies of redacted versions of the documents for which DEF requests confidential classification. The specific information for

which confidential treatment is requested has been blocked out by opaque marker or other means.

(c) Exhibit C is a table which identifies by page and line the information for which DEF seeks confidential classification and the specific statutory bases for seeking confidential treatment.

(d) Exhibit D includes the affidavits of Reginald D. Anderson, and BenjaminBorsch attesting to the confidential nature of the information identified in Exhibit C.

3. As indicated in Exhibits C and D, the information for which DEF requires confidential classification is "proprietary confidential business information" within the meaning of § 366.093(3), F.S. Specifically, the information at issue in DEF's response to Sierra Club's First Set of Interrogatories, Question 7 and 11 and First Request for Production of Documents, Question 7, relate to DEF's generation projects, to include DEF's costs associated with these projects and internal processes and procedures. That information relates to DEF's competitive business interests, and, thus, its disclosure would impair DEF's ability to compete in the marketplace. In addition, these documents contain pricing and other 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.

4. The information at issue in DEF's response to Sierra Club's First Request for Production of Documents, Question 10, includes information relating to third-party forecasting information. That information relates to DEF's competitive business interests, and, absent confidential classification, disclosure would impair DEF's ability to compete in the marketplace 5.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.

2

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 28th 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

#### 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

#### **STEPHANIE A. CUELLO**

Senior Counsel 106 East College Avenue, Suite 800 Tallahassee, Florida 32301 T: (850) 521-1425 E: <u>stephanie.cuello@duke-energy.com</u> 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 28th 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 MThompso@psc.state.fl.us SStiller@psc.state.fl.us 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 kputnal@moylelaw.com

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

Sari Amiel Sierra Club 50 F St. NW, Eighth Floor Washington, DC 20001 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 trierweiler.walt@leg.state.fl.us watrous.austin@leg.state.fl.us wessling.mary@leg.state.fl.us

Bradley Marshall / Jordan Luebkemann / Hema Lochan Earthjustice LULAC & FL Rising 111 S. Martin Luther King Jr. Blvd. Tallahassee, Florida 32301 <u>bmarshall@earthjustice.org</u> jluebkemann@earthjustice.org hlochan@earthjustice.org 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 <u>schef@gbwlegal.com</u> <u>jlavia@gbwlegal.com</u>

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 mkl@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 lwb@smxblaw.com 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@wcglawoffice.com

Nikhil Vijaykar Keyes & Fox LLP EVgo Services, LLC 580 California St., 12th Floor San Francisco, CA 94104 <u>nvijaykar@keyesfox.com</u>

Lindsey Stegall EVgo Services, LLC 11835 W. Olympic Blvd., Ste. 900E Los Angeles, CA 90064 Lindsey.Stegall@evgo.com

Frederick L. Aschauer, Jr., Esq. Allan J. Charles, Esq. Lori Killinger, Esq. Lewis, Longman & Walker P.A. AACE / Circle K / RaceTrac / Wawa 106 East College Avenue, Suite 1500 Tallahassee, Florida 32301 <u>fAschauer@llw-law.com</u> <u>acharles@llw-law.com</u> <u>lkillinger@llw-law.com</u> <u>jmelchior@llw-law.com</u>

# **Exhibit** A

# **"CONFIDENTIAL"** (filed under separate cover)

# **Exhibit B**

# REDACTED (copy-one)

DEF's Response to Sierra Club POD 1(1-13) AUTHORIZED COPY Q7

## REDACTED

Document title:

# **Operating Plan Development and** Implementation – Florida Users Guide

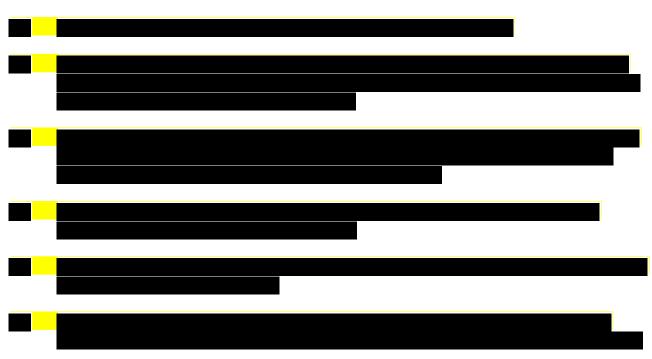
Keywords:

FSO portfolio management; Unit Commitment; Operational Plan

#### 1.0 **Purpose/Use**

This User Guide establishes the roles and responsibilities for Energy Control Center (ECC) Florida personnel, Fuels & System Optimization (FSO), and Regulated and Renewable Energy (RRE) Operations. Specifically, this User Guide defines the functions of these organizations and the communications necessary to support economic optimization of all resources while considering operational constraints and reserve margin requirements for system reliability.

#### 2.0 Definitions



	STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 1 of 14
--	------------------------	-----------------	--------------

#### Document number:

Revision No.:

STDP-MKT-FSO-00022-DEF

001

Operations; Fuels and System **Optimization; System Operations** 

Regulated and Renewable

3.0 Responsibiliti	ies – General	
-		
<b>_</b>		
		I
STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 2 of 14
Q7	Duke Energy Proprietary Business Information – Not for external distribution	

DEF's Response to Sierra Club POD 1(1-13) AUTHORIZED COPY Q7

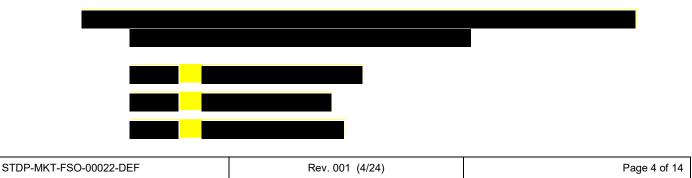
# REDACTED

	-	
STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 3 of 14



#### 4.0 **Processes and Communications**

#### 4.1 Economic Operating Plan





#### CAUTION

ECC, Transmission and Plant personnel SHALL comply with FERC Standards of Conduct by NOT communicating information to Marketing personnel regarding capability activities affecting the transmission system, i.e., on the transmission side of the generator tie/generator breaker. Marketing personnel may only be notified if the generating unit is to be affected (i.e., unavailable) WITHOUT disclosing cause.



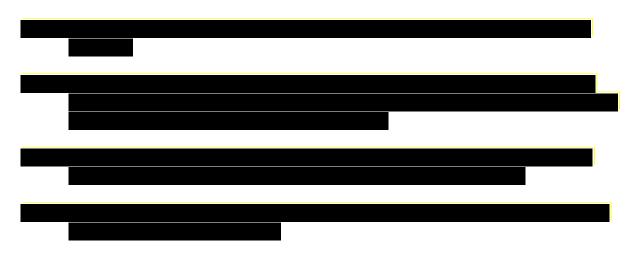
Page 6 of 14

# REDACTED

STDP-MKT-FSO-00022-DEF

Rev. 001 (4/24)

4.2 Official Operating Plan (Reference Attachment 1)



**Real Time Adjustments to Official Operating Plan:** 4.3



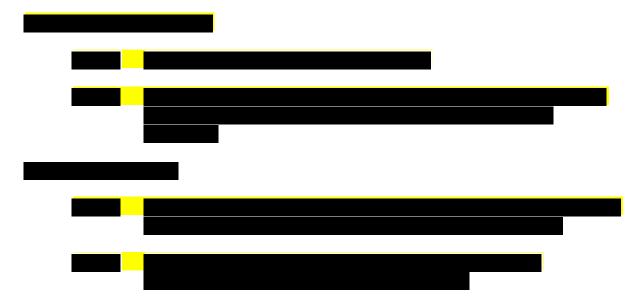
# AUTHORIZED COPY Q7



#### 4.4 Economic Analysis of Alternate Scenarios



#### 4.5 **Maintenance of Operating Data**

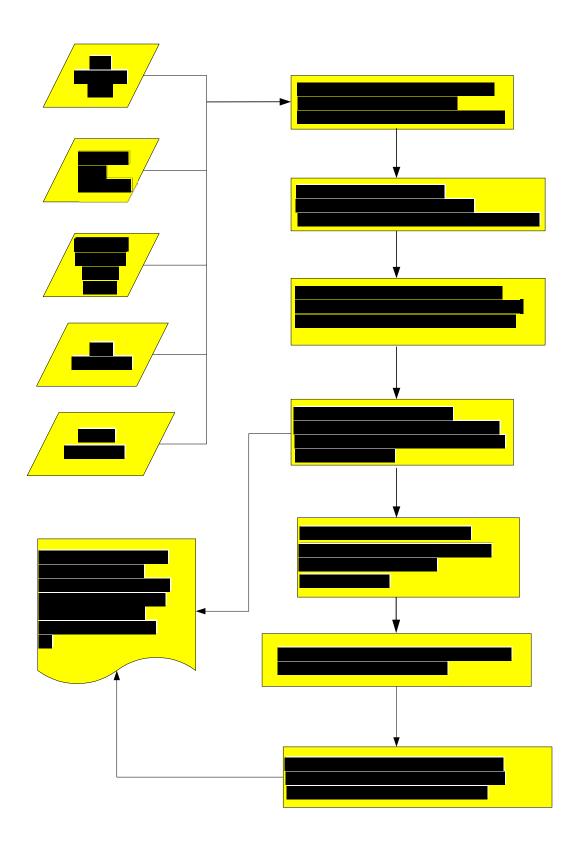


#### 5.0 Records and Retention



STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 9 of 14
~-		

# REDACTED ATTACHMENT 1 DEVELOPMENT OF THE OFFICIAL OPERATING PLAN



STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 10 of 14
------------------------	-----------------	---------------

# Attachment 2 Model Input Data Provider Responsibilities

Data Element	Responsible Organizations	Minimum Update Frequency	Deadline	Data Submittal Method

(1)		

	STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 11 of 14
--	------------------------	-----------------	---------------

# Attachment 3

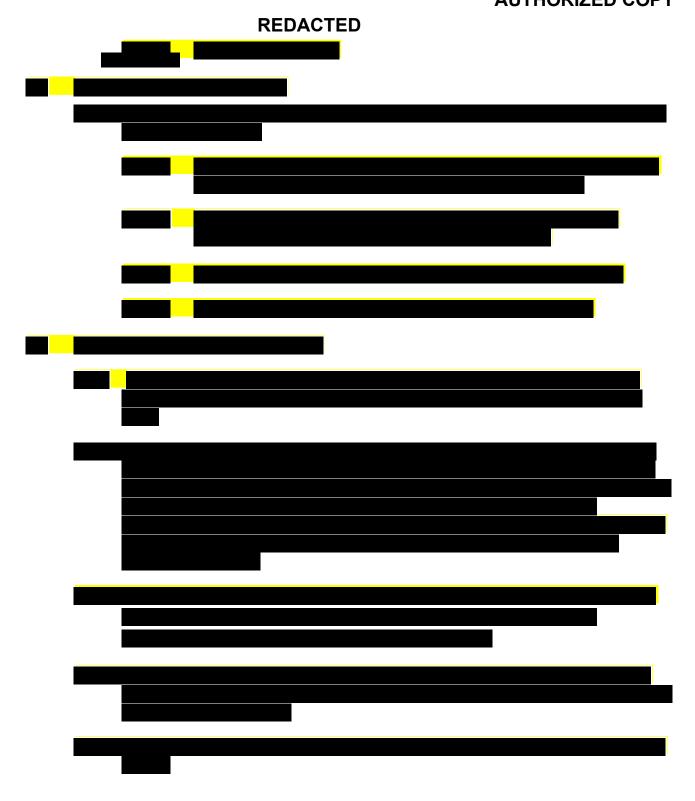
# **Severe Conditions Planning**

STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 12 of 14

Duke Energy Proprietary Business Information – Not for external distribution

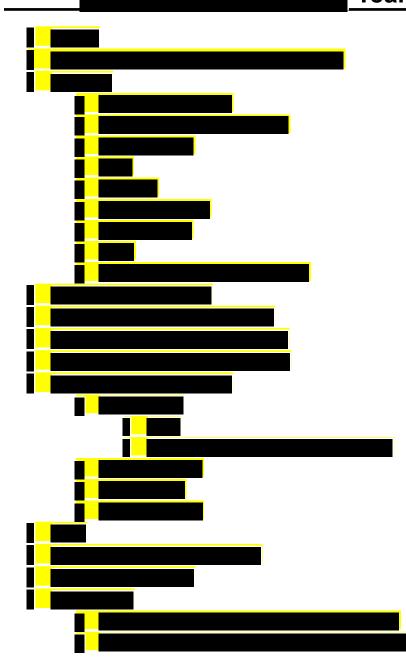
20240025-SIERRACLUBPPOD1-00001519

DEF's Response to Sierra Club POD 1(1-13) AUTHORIZED COPY Q7



STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 13 of 14
	L	

# REDACTED **Attachment 4 Team Meeting Agenda**



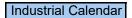
STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 14 of 14
07		

			Page	e 2 o
Year Month Large Customers I Ind	ustrial Excluding Large Customers Billed I	Industrial Billed	Industrial Excluding Large Customers_Calendar	_
		325,588		
		312,424		
		302,195		
		355,234 320,647		
		364,501		
		352,778		
		386,739		
		373,128		
		357,470		
		357,350		
		331,817		
		344,867		
		315,521		
		345,666		
		350,580		
		368,382		
		380,544		
		332,624		
		361,976		
		372,403		
		325,835 332,132		
		329,493		
		283,885		
		318,130		
		292,588		
		314,270		
		308,801		
		315,387		
		332,633		
		345,601		
		330,292		
		301,141		
		328,105		
		348,570		
		284,847		
		271,997		
		308,541		

	Page 3
311,450	
360,809	
336,404	
329,327	
334,687	
316,943	
335,901	
381,573	
213,817	
271,809	
254,392 264,504	
279,133	
279,133	
280,646	
292,424	
264,843	
306,550	
226,759	
324,306	
248,136	
246,057	
261,310	
260,907	
291,812	
285,924	
289,178	
288,009	
277,073	
271,176	
250,963	
260,215	
236,720	
262,022	
265,854	
244,090	
261,361	
299,905 287,783	
266,234	
200,204	

DEF's Response to Sierra Club POD 1 (1-13) Q10 <u>Page 4</u> of 21

	Page 4
296,266	
275,919	
269,587	
268,193	
245,524	
248,421	
253,164	
255,451	
264,787	
269,547	
273,573	
273,358	
270,778	
275,105	
252,612	
264,412	
259,044	
250,171	
253,946	
250,408	
268,166	
273,779	
285,459	
273,508	
279,816	
273,491	
248,953	
288,444	
260,213	
263,190	
268,380	
269,800	
250,743	
269,381	
282,382	
276,281	
294,073	
269,846	
292,551	
282,548	





20240025-SIERRACLUBPOD1-00002917



# Duke Energy Florida, LLC SC ROG 1-11a-b DEF Coal Supply Contract Obligations Tons and Cost Contacted Obligations as of 1/1/2021 through 4/12/2024

RE	DA	СТ	ΈD	
116				

	Contacted (	Obligations as of	f 1/1/2021 thi	rough 4/12/20	)24																		
Contract#Counter PartyEffectiveExpiration Date2026 Low202120222023202420252026202120222023202420252026Contract TypeContractDate <td< th=""><th></th><th></th><th></th><th></th><th></th><th></th><th>Obl</th><th>igations (tons)</th><th></th><th></th><th></th><th></th><th>Annua</th><th>al Coal Purc</th><th>hase Pric</th><th>e/Ton</th><th></th><th></th><th></th><th></th><th>Annual Coal Pu</th><th>rchase Amount</th><th></th></td<>							Obl	igations (tons)					Annua	al Coal Purc	hase Pric	e/Ton					Annual Coal Pu	rchase Amount	
	Contract#	Counter Party			(tons) 2021 - 2026 (may include prior period	2021	2022	2023	2024	2025	2026	2021	2022	2023	2024	2025	2026		2021	2022	2023	2024	2025

Annual Avg Purchase Price



Q11(a-b) Page 1 of 1

#### Sierra Club ROG 1-17

Project Name	Capacity MW-ac	Overnight Cost \$/kW-ac
Winquepin	74.90	
County Line (formerly Spring Ridge)	74.90	
Falmouth	74.90	
Mule Creek	74.90	
DEF Solar Growth - 2025 Sundance	74.90	
DEF Solar Growth - 2025 #2	74.90	
DEF Solar Growth - 2025 Bailey Mill	74.90	
DEF Solar Growth - 2025 Half Moon	74.90	
DEF Solar Growth - 2025 Rattler	74.90	
DEF Solar Growth - 2025 #6	74.90	
DEF Solar Growth - 2026 #1	74.90	
DEF Solar Growth - 2026 #2	74.90	
DEF Solar Growth - 2026 #3	74.90	
DEF Solar Growth - 2026 #4	74.90	
DEF Solar Growth - 2027 #1	74.90	
DEF Solar Growth - 2027 #2	74.90	
DEF Solar Growth - 2027 #3	74.90	
DEF Solar Growth - 2027 #4	74.90	

DEF's Response to Sierra Club ROG 1(1-38) Q17-18 Page 1 of 1

20240025-SIERRACLUBROG1-00000013

Duke Energy Florida Docket No. 20240025 DEF's Response to Sierra Club POD 1 (1-13) Q10

# REDACTED Documents bearing Bates numbers 20240025-SIERRACLUB-00002922 through 20240025-SIERRACLUB-00003176 are **redacted** in their entirety.

# **Exhibit B**

# REDACTED (copy-two)

DEF's Response to Sierra Club POD 1(1-13) AUTHORIZED COPY Q7

## REDACTED

Document title:

# **Operating Plan Development and** Implementation – Florida Users Guide

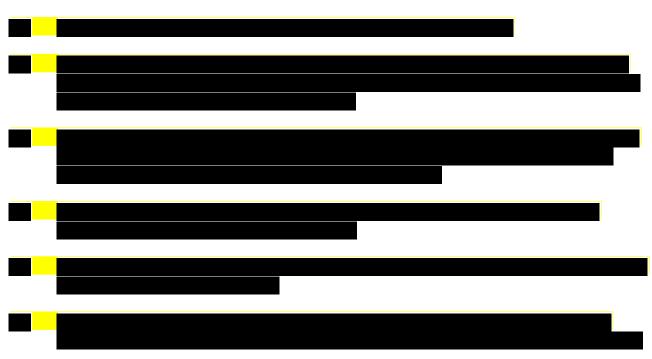
Keywords:

FSO portfolio management; Unit Commitment; Operational Plan

#### 1.0 **Purpose/Use**

This User Guide establishes the roles and responsibilities for Energy Control Center (ECC) Florida personnel, Fuels & System Optimization (FSO), and Regulated and Renewable Energy (RRE) Operations. Specifically, this User Guide defines the functions of these organizations and the communications necessary to support economic optimization of all resources while considering operational constraints and reserve margin requirements for system reliability.

#### 2.0 Definitions



	STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 1 of 14
--	------------------------	-----------------	--------------

#### Document number:

Revision No.:

STDP-MKT-FSO-00022-DEF

001

Operations; Fuels and System **Optimization; System Operations** 

Regulated and Renewable

3.0 Respons	sibilities – Genera	l	
_			
STDP-MKT-FSO-00	022-DEF	Rev. 001 (4/24)	Page 2 of 14
Q7		prietary Business Information – Not for exte	

DEF's Response to Sierra Club POD 1(1-13) AUTHORIZED COPY Q7

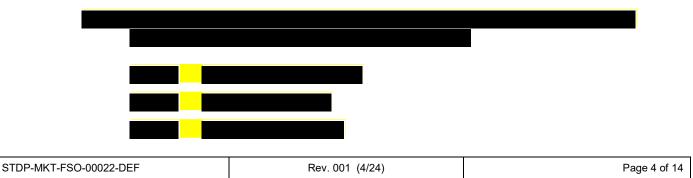
# REDACTED

	-	
STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 3 of 14



#### 4.0 **Processes and Communications**

## 4.1 Economic Operating Plan





#### CAUTION

ECC, Transmission and Plant personnel SHALL comply with FERC Standards of Conduct by NOT communicating information to Marketing personnel regarding capability activities affecting the transmission system, i.e., on the transmission side of the generator tie/generator breaker. Marketing personnel may only be notified if the generating unit is to be affected (i.e., unavailable) WITHOUT disclosing cause.



Page 6 of 14

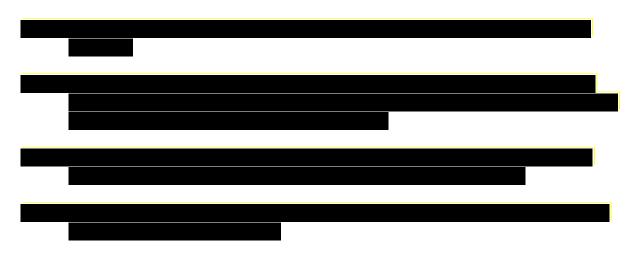
# REDACTED

STDP-MKT-FSO-00022-DEF

Rev. 001 (4/24)

Duke Energy Proprietary Business Information – Not for external distribution 20240025-SIERRACLUBPPOD1-00001513

4.2 Official Operating Plan (Reference Attachment 1)



**Real Time Adjustments to Official Operating Plan:** 4.3



Duke Energy Proprietary Business Information – Not for external distribution 20240025-SIERRACLUBPPOD1-00001514

# AUTHORIZED COPY Q7

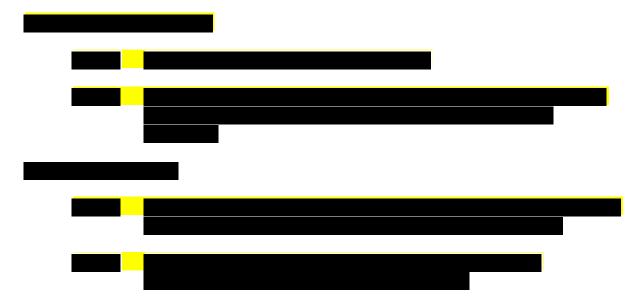


Duke Energy Proprietary Business Information – Not for external distribution 20240025-SIERRACLUBPPOD1-00001515

### 4.4 Economic Analysis of Alternate Scenarios



### 4.5 **Maintenance of Operating Data**

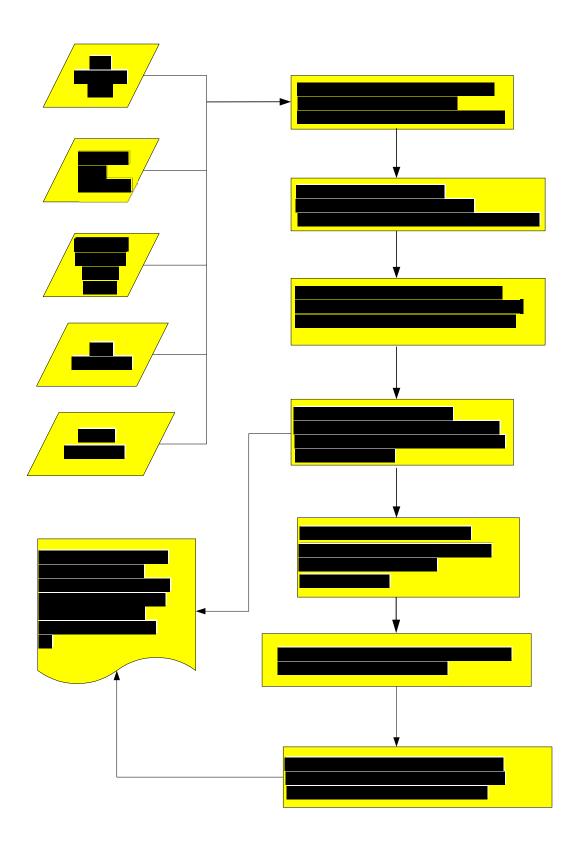


### 5.0 Records and Retention



STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 9 of 14
~-		

### REDACTED ATTACHMENT 1 DEVELOPMENT OF THE OFFICIAL OPERATING PLAN



STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 10 of 14
------------------------	-----------------	---------------

# Attachment 2 Model Input Data Provider Responsibilities

Data Element	Responsible Organizations	Minimum Update Frequency	Deadline	Data Submittal Method

(1)		

	STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 11 of 14
--	------------------------	-----------------	---------------

# Attachment 3

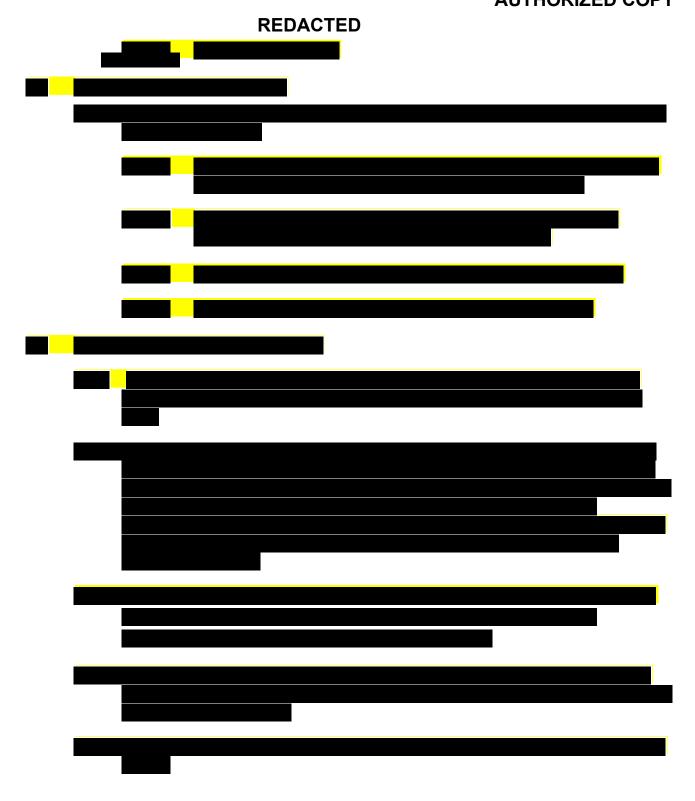
# **Severe Conditions Planning**

STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 12 of 14

Duke Energy Proprietary Business Information – Not for external distribution

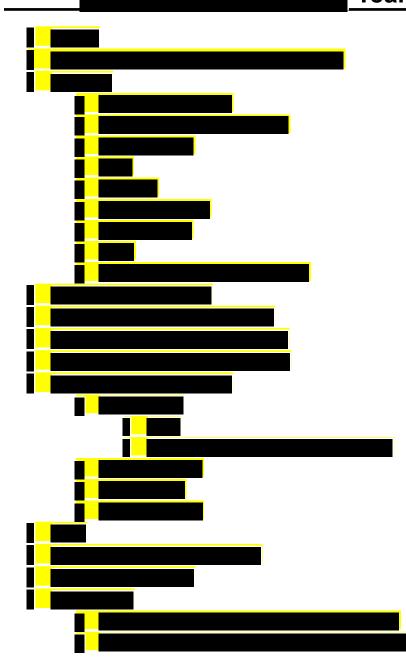
20240025-SIERRACLUBPPOD1-00001519

DEF's Response to Sierra Club POD 1(1-13) AUTHORIZED COPY Q7



STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 13 of 14
	L	

# REDACTED **Attachment 4 Team Meeting Agenda**



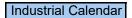
STDP-MKT-FSO-00022-DEF	Rev. 001 (4/24)	Page 14 of 14
07		

			Page	e 2 o
Year Month Large Customers I Ind	ustrial Excluding Large Customers Billed I	Industrial Billed	Industrial Excluding Large Customers_Calendar	_
		325,588		
		312,424		
		302,195		
		355,234 320,647		
		364,501		
		352,778		
		386,739		
		373,128		
		357,470		
		357,350		
		331,817		
		344,867		
		315,521		
		345,666		
		350,580		
		368,382		
		380,544		
		332,624		
		361,976		
		372,403		
		325,835 332,132		
		329,493		
		283,885		
		318,130		
		292,588		
		314,270		
		308,801		
		315,387		
		332,633		
		345,601		
		330,292		
		301,141		
		328,105		
		348,570		
		284,847		
		271,997		
		308,541		

	Page 3
311,450	Ĭ
360,809	
336,404	
329,327	
334,687	
316,943	
335,901	
381,573	
213,817	
271,809	
254,392	
264,504	
279,133	
271,886 280,646	
280,040	
264,843	
306,550	
226,759	
324,306	
248,136	
246,057	
261,310	
260,907	
291,812	
285,924	
289,178	
288,009	
277,073	
271,176	
250,963	
260,215	
236,720	
262,022	
265,854	
244,090	
261,361	
299,905	
287,783	
266,234	

DEF's Response to Sierra Club POD 1 (1-13) Q10 <u>Page 4</u> of 21

	Page 4
296,266	
275,919	
269,587	
268,193	
245,524	
248,421	
253,164	
255,451	
264,787	
269,547	
273,573	
273,358	
270,778	
275,105	
252,612	
264,412	
259,044	
250,171	
253,946	
250,408	
268,166	
273,779	
285,459	
273,508	
279,816	
273,491	
248,953	
288,444	
260,213	
263,190	
268,380	
269,800	
250,743	
269,381	
282,382	
276,281	
294,073	
269,846	
292,551	
282,548	





20240025-SIERRACLUBPOD1-00002917



# Duke Energy Florida, LLC SC ROG 1-11a-b DEF Coal Supply Contract Obligations Tons and Cost Contacted Obligations as of 1/1/2021 through 4/12/2024

RE	DA	СТ	ΈD	
116				

Contacted Obligations as of 1/1/2021 through 4/12/2024																						
						Ob	ligations (tons)					Annual Coal Purchase Price/Ton				Annual Coal Purchase Amount			rchase Amount			
Contract#	Counter Party	Effective Date	Expiration Date	Total Obligation (tons) 2021 - 2026 (may include prior period carryover tons)	2021	2022	2023	2024	2025	2026	2021	2022	2023	2024	2025	2026	Contract Type	2021	2022	2023	2024	2025

Annual Avg Purchase Price



Q11(a-b) Page 1 of 1

### Sierra Club ROG 1-17

Project Name	Capacity MW-ac	Overnight Cost \$/kW-ac
Winquepin	74.90	
County Line (formerly Spring Ridge)	74.90	
Falmouth	74.90	
Mule Creek	74.90	
DEF Solar Growth - 2025 Sundance	74.90	
DEF Solar Growth - 2025 #2	74.90	
DEF Solar Growth - 2025 Bailey Mill	74.90	
DEF Solar Growth - 2025 Half Moon	74.90	
DEF Solar Growth - 2025 Rattler	74.90	
DEF Solar Growth - 2025 #6	74.90	
DEF Solar Growth - 2026 #1	74.90	
DEF Solar Growth - 2026 #2	74.90	
DEF Solar Growth - 2026 #3	74.90	
DEF Solar Growth - 2026 #4	74.90	
DEF Solar Growth - 2027 #1	74.90	
DEF Solar Growth - 2027 #2	74.90	
DEF Solar Growth - 2027 #3	74.90	
DEF Solar Growth - 2027 #4	74.90	

DEF's Response to Sierra Club ROG 1(1-38) Q17-18 Page 1 of 1

20240025-SIERRACLUBROG1-00000013

Duke Energy Florida Docket No. 20240025 DEF's Response to Sierra Club POD 1 (1-13) Q10

## REDACTED Documents bearing Bates numbers 20240025-SIERRACLUB-00002922 through 20240025-SIERRACLUB-00003176 are **redacted** in their entirety.

# **Exhibit** C

### DUKE ENERGY FLORIDA Confidentiality Justification Matrix

<b>RESPONSE/DOCUMENT</b>	PAGE/LINE	JUSTIFICATION
DEF's Response to Sierra Club's	<b>Question 11</b> : All information	§366.093(3)(e), F.S.
First Set of Interrogatories (Nos. 1-	in Bates number 20240025-	The documents in
38), Questions 11 and 17.	SIERRACLUBROG1-	question contain
	00000012 with the exception	confidential information
	of headers "Contract#,	relating to competitive
	Counterparty, Effective Date,	business interests, the
	Expiration Date, Obligation	disclosure of which
	(tons), Total Obligation,	would impair the
	2021-2026, Annual Coal	competitive business of
	Purchase Price/Ton 2021-	the provider/owner of the
	2026 and Contract type, and	information.
	Annual Coal Purchase	
	Amount 2021-2026" is	§366.093(3)(d), F.S.
	confidential.	The documents in
		question contain
	Question 17:	confidential information,
	The information in column	the disclosure of which
	"Overnight Cost \$/kw-ac"	would impair DEF's
	bearing Bates number	efforts to contract for
	20240025-	goods or services on
	SIERRACLUBROG1-	favorable terms.
	0000013 is confidential in	
	their entirety.	
<b>RESPONSE/DOCUMENT</b>	PAGE/LINE	JUSTIFICATION
DEF's Response to Sierra Club's	<b>Question 7:</b> All information	§366.093(3)(e), F.S.
First Request for Production of	after reliability in the section	The documents in
Documents (Nos. 1-13), Questions 7	1.0 bearing Bates number	question contain
and 10.	SIERRACLUBPOD1-	confidential information
	00001508 is confidential.	relating to competitive
		business interests, the
	All information in Bates	disclosure of which
	numbers 20240025-	would impair the
	SIERRACLUBPOD1-	competitive business of
	00001509 through	the provider/owner of the
	20240025-	information.
	SIERRACLUBPOD1-	

00001510 is confidential in their entirety.Bates number 20240025- SIERRACLUBPOD1- 00001511-with the exception of headers for subsection "4.0 and 4.1" is confidential.Bates number 20240025- SIERRACLUBPOD1- 00001512-with the exception of "Caution" paragraph is confidential.All information in Bates number 20240025- SIERRACLUBPOD1- 00001513 is confidential in their entiretyBates number 20240025- SIERRACLUBPOD1- 00001513 is confidential in their entiretyBates number 20240025- SIERRACLUBPOD1- 00001514-with the exception of headers for subsection "4.2 and 4.3" is confidential.All information in Bates number 20240025- SIERRACLUBPOD1- 00001515 is confidential in their entiretyBates number 20240025- SIERRACLUBPOD1- 00001515 is confidential in their entiretyBates number 20240025- SIERRACLUBPOD1- 00001516-with the exception of headers for subsection "4.4, 4.5 and 5.0" is confidential.All information in Bates number 20240025- SIERRACLUBPOD1- 00001516-with the exception of headers for subsection "4.4, 4.5 and 5.0" is confidential.All information in Bates number 20240025- SIERRACLUBPOD1- 00001516-with the exception of headers for subsection "4.4, 4.5 and 5.0" is confidential.	§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.

Bates number 20240025- SIERRACLUBPOD1-	
00001518-with the exception	
of headers for "Data	
Element, Responsible	
Organizations, Minimum	
Update Frequency, Deadline,	
and Data Submitted Method"	
is confidential.	
All information in Bates	
number 20240025-	
SIERRACLUBPOD1-	
00001519 and 20240025-	
SIERRACLUBPOD1-	
00001520 is confidential in	
their entirety.	
Bates number 20240025-	
SIERRACLUBPOD1-	
00001521-the information	
after "Attachment 4" but	
before "Team Meeting " and	
all information after "Team	
Meeting" is confidential.	
Question 10:	
All information in columns,	
"Year, Month, Large	
Customers, Industrial	
Excluding Large Customers	
Billed, Industrial Excluding	
Large Customers, Calendar	
and Industrial Calendar",	
bearing Bates numbers	
20240025-	
SIERRACLUBPOD1-	
SIERRACLUBPOD1- 00002902 through 2921 is	
00002902 through 2921 is	
00002902 through 2921 is confidential.	
00002902 through 2921 is confidential. Documents bearing	
Customers, Industrial Excluding Large Customers Billed, Industrial Excluding Large Customers, Calendar and Industrial Calendar", bearing Bates numbers	

20240025-SIERRACLUB- 00003176 are confidential in	
their entirety.	

# **Exhibit D**

# AFFIDAVITS OF REGINALD D. ANDERSON 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 28, 2024

### AFFIDAVIT OF REGINALD D. ANDERSON IN SUPPORT OF DUKE ENERGY FLORIDA, LLC'S <u>REQUEST FOR CONFIDENTIAL CLASSIFICATION</u>

### 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 budgets, and I lead the development of regional succession planning.

4. DEF is seeking confidential classification for information contained in response to the Sierra Club's First Set of Interrogatories 11 and 17 and First Request for Production of Documents, Question 7. 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 Sierra Club's First Set of Interrogatories 11 and 17 and First Request for Production of Documents, Question 7, contain confidential information. Specifically, these documents contain information relating to DEF's generation projects, to include DEF's costs associated with these projects and internal processes and procedures. That information relates to DEF's competitive business interests, and, thus, its disclosure would impair DEF's ability to compete in the marketplace. In addition, these documents contain pricing and other 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.

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

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this \_\_\_\_ day of \_\_\_\_\_, 2024 by Reginald D. Anderson. 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)

### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20240025-EI

Dated: June 28, 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 the Company's Ten-Year Site Plan ("TYSP") filed each April.

4. DEF is seeking confidential classification for information contained in response to the Sierra Club's First Request for Production of Documents, 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 Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to Sierra Club's First Request for Production of Documents, Question 10, contain confidential information. Specifically, these documents contain third-party pricing information relating to contracts for goods and services. Disclosure of this nonpublic 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.

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)