

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20240025-EI

Dated: July 23, 2024

**NOTICE OF FILING VERIFIED AFFIDAVITS IN SUPPORT OF DUKE ENERGY
FLORIDA, LLC'S AMENDED REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida, LLC, ("DEF") hereby gives notice of filing the verified Affidavits of Nicole Aquilina, Rebekah Buck, Lance Burnette, Vanessa Goff, Brian Lloyd, Karl Newlin, and Michael O'Hara in support of DEF's Amended Request for Confidential Classification, submitted on May 8, 2024 (document number 02878-2024), regarding its Response to OPC's First Set of Interrogatories (Nos. 1-60) and First Request for Production of Documents (Nos. 1-26), this 23rd day of July, 2024.

Respectfully submitted,

/s/ Dianne M. Triplett

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 by electronic mail this 23rd day of July, 2024, to the following:

/s/ Dianne M. Triplett

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: May 2, 2024

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

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Nicole Aquilina. 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 Accounting Manager II, providing accounting leadership for DEF.
3. As Accounting Manager II, I am responsible for ensuring that the accounting impacts of the Company's business activities and transactions are understood and properly

recorded to the general ledger, and that such accounting impacts, as well as any applicable related variances to budget and prior year results, are clearly explained and properly presented in internal and external financial reports. I am also responsible for ensuring that the accounting team performs its tasks in an accurate and timely manner in accordance with published deadlines while strictly adhering to Company policies and controls.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") First Request for Production of Documents, Question 17. 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 OPC's First Request for Production of Documents, Question 17 contain confidential information. Specifically, the documents include confidential settlement information, settlement amounts, and settlement terms, which is sensitive, internal business information that relates to DEF's competitive interests. Absent confidential classification, DEF's ability to negotiate settlements would be impaired in the future, which would, in turn, 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 the Company. At no time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 15 day of May, 2024.

Nicole Aquilina
(Signature)

Nicole Aquilina
Accounting Manager II
Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 15 day of May, 2024 by Nicole Aquilina. She is personally known to me or has produced her driver's license or her _____ as identification.

Donna E Harkey
(Signature)

Donna E Harkey
(Printed Name)

NOTARY PUBLIC, STATE OF NC

03-01-29
(Commission Expiration Date)

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: May 2, 2024

**AFFIDAVIT OF REBEKAH E. BUCK IN SUPPORT OF
DUKE ENERGY FLORIDA, LLC'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Rebekah E. Buck. 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 of Allocations and Reporting. DEBS provides various administrative and other services to DEF.

3. As Director of Allocations and Reporting, I am responsible for various accounting activities, including the cost allocation processes for service company costs utilized for Duke

Energy and its affiliates (like DEF).

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") First Request for Production of Documents, Questions 11 and 12, and in response to OPC's First Set of Interrogatories, Questions 7 and 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 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 First Request for Production of Documents, Questions 11 and 12 contain internal sensitive business information that relates to internal compensation procedures, valuations, and costs, the disclosure of which would impair the efforts of the Company to negotiate on favorable terms. Additionally, if the information at issue was disclosed, DEF's efforts to obtain employees at a competitive rate that provides economic value to both DEF and its customers could be compromised. With this non-public information, employers and potential hires could alter their behavior to the detriment of DEF and its customers. Absent confidential classification, competitors would have access to this sensitive business information, which may impair DEF's ability to effectively hire employees at a competitive rate to its workforce.

6. Documents produced in response to OPC's First Request for Production of Documents, Questions 11 and 12, and OPC's First Set of Interrogatories, Questions 7 and 8, contain internal sensitive affiliate costs and projections and affiliate charges and projections that relate to DEF's competitive business interests. Absent confidential classification, competitors would have access to this sensitive business information, which may impair DEF's ability to

effectively compete in the marketplace.

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

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 5th day of June, 2024.

Rebekah E. Buck
(Signature)

Rebekah E. Buck
Director, Allocations and Reporting
Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 5th day of June, 2024 by Rebekah E. Buck. She is personally known to me or has produced her _____ driver's license, or her _____ as identification.



Teresa Ray
(Signature)

Teresa Ray
(Printed Name)

NOTARY PUBLIC, STATE OF NC

01/21/29
(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 2, 2024

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

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Lance Burnette. 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 as Director of Insurance Operations and Claims Management.

3. As Director of Insurance Operations and Claims Management, I am responsible for, among other things, obtaining insurance for various business functions and overseeing the claims

process.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") First Request for Production of Documents, Question 10. 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 OPC's First Request for Production of Documents, Question 10 contain internal sensitive business information to include insurance amounts and insurance policies. As such, those documents contain the terms of contracts for services. Disclosure of this non-public information could alter insurance providers' behavior and impair DEF's efforts to contract for insurance on favorable terms in the future.

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 the Company. At no time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 14th day of JUNE, 2024.

[Handwritten Signature]

(Signature)
Lance Burnette
Director, Ins. Ops. and Claims Mgmt.
Duke Energy Business Services

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 14 day of June, 2024 by Lance Burnette. He is personally known to me or has produced his NC Drivers License driver's license, or his _____ as identification.

[Handwritten Signature]
(Signature)

Sheila Lemoine
(Printed Name)

NOTARY PUBLIC, STATE OF _____

July 21, 2024
(Commission Expiration Date)

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: May 2, 2024

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

STATE OF NEW YORK

COUNTY OF Yates

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

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

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

3. As Director of Renewables Development, I am responsible for the development of new solar facilities in Florida on behalf of DEF. I lead a team that conducts solar development

activities, including project siting, land acquisition, resource assessment, permitting, obtaining interconnection rights, project layout and design, arranging contracts for engineering, procurement, and construction ("EPC") services, as well as originating, structuring, and executing transactions to acquire rights to existing solar development projects.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") First Request for Production of Documents, Question 22 (Solar), and First Set of Interrogatories, Question 40. 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 OPC's First Request for Production of Documents, Question 22 (Solar), and First Set of Interrogatories, Question 40, contain confidential information. Specifically, those documents contain the terms of contracts for goods and services. Disclosure of this non-public information could alter contractors' behavior to the detriment of DEF and its customers. 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 the Company. At no time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 18th day of June, 2024.

Vanessa Goff
(Signature)

Vanessa Goff
Director, Renewables Business Development
Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 18 day of June, 2024 by Vanessa Goff. She is personally known to me or has produced her New York driver's license, or her _____ as identification.

Betty M. Daggett
(Signature)

Betty M. Daggett
(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF New York
November 5, 2025
(Commission Expiration Date)

BETTY M. DAGGETT
Notary Public State of New York
Yates County # 01DA6066162
Comm. Expires November 5, 2025

01 DA6066162
(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 2, 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 the Office of the Public Counsel's ("OPC") First Request for Production of Documents, Question 22 (Distribution), and the OPC's First Set of Interrogatories, Question 55 (Distribution). 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 OPC's First Request for Production of Documents, Question 22 (Distribution), and the OPC's First Set of Interrogatories, Question 55 (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.

6. Documents produced in response to OPC's First Request for Production of Documents, Question 22 (Distribution), and the OPC's First Set of Interrogatories, Question 55 (Distribution), also 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.


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 the Company. At no time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.


Further affiant sayeth not.

Dated the 8th day of May, 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 8th day of May, 2024 by Brian M. Lloyd. He is personally known to me or has produced her FL Florida driver's license, or his _____ as identification.



(Signature)
Thomas Mosca

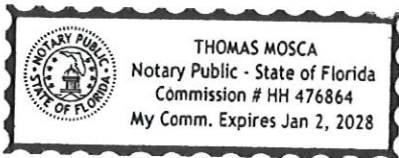
(Printed Name)
NOTARY PUBLIC, STATE OF FL

Jan 2, 2028

(Commission Expiration Date)
HH 476864

(Serial Number, If Any) com #

(AFFIX NOTARIAL SEAL)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: May 2, 2024

**AFFIDAVIT OF KARL W. NEWLIN IN SUPPORT OF
DUKE ENERGY FLORIDA, LLC'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Karl W. Newlin. 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 Senior Vice President, Corporate Development and Treasurer. DEBS provides various administrative and other services to DEF.

3. In my role as Treasurer, I am responsible for treasury-related services to Duke

Energy and its subsidiaries, including DEF. I monitor trends in the investment markets and maintain key relationships with debt investors, analysts, and financial institutions. Under my supervision, the Treasury Department arranges and executes all capital raising and liquidity transactions, including credit facilities and commercial paper, debt securities, preferred and hybrid securities, and common stock, as well as daily cash management for Duke Energy and its subsidiaries. My responsibilities include managing Duke Energy and its subsidiaries' credit ratings and interactions with the major credit rating agencies, commercial banks, and the capital markets. I am also responsible for liability management and long-term investments.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") First Request for Production of Documents, Questions 7 and 16. 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 OPC's First Request for Production of Documents, Questions 7 and 16 contain confidential information. Specifically, they discuss a wide range of internal sensitive business information that relates to DEF's competitive interests, including its long-term strategic plans, financial plans, and regulatory strategies. Absent confidential classification, competitors would have access to this sensitive business information, which may impair DEF's ability to effectively compete in the marketplace.

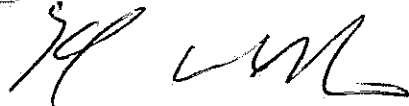
6. Upon receipt of confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist the Company. At

no time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

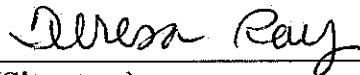
Further affiant sayeth not.

Dated the 8th day of May, 2024.

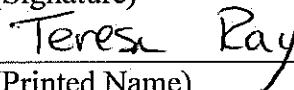


(Signature)
Karl W. Newlin
Treasurer
Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 8th day of May, 2024 by Karl W. Newlin. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



(Signature)



(Printed Name)

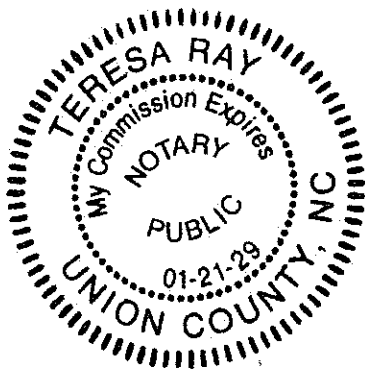
(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF NC

01/21/29

(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 2, 2024

**AFFIDAVIT OF MICHAEL O'HARA 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 Michael O'Hara, who being first duly sworn, on oath deposes and says that:

1. My name is Michael O'Hara. 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 the Regional Forecasting Director for Duke Energy Florida, LLC.

3. As Regional Forecasting Director, my duties and responsibilities include strategic planning, financial planning and forecasting, business planning, budgeting, cost management, management accounting, and key performance management.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") First Request for Production of Documents, Question 23. 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 OPC's First Request for Production of Documents, Question 23, contain sensitive internal policies, including documents governing approval level criteria for executives and the Board of Directors as well as budgeting guidelines (to include capital budgeting). Those documents relate to DEF's competitive business interest and, consequently, disclosure would provide competitors access to information that could impair DEF's ability to effectively 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 the Company. At no time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

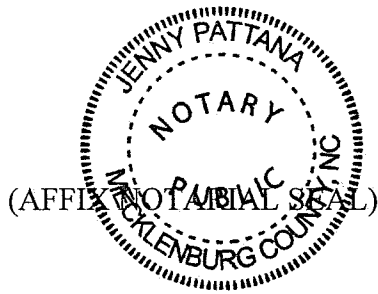
7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 10th day of July, 2024.

[Signature]
(Signature)
Michael O'Hara
Director, Regional Forecasting
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 10 day of July, 2024 by Michael O'Hara. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



[Signature]
(Signature)
Jenny Pattana
(Printed Name)
NOTARY PUBLIC, STATE OF NC
06/08/2025
(Commission Expiration Date)

(Serial Number, If Any)