

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20240025-EI

Dated: July 23, 2024

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

Duke Energy Florida, LLC, ("DEF") hereby gives notice of filing the verified Affidavits of Reginald Anderson, Vanessa Goff, and Edward Scott, in support of DEF's Request for Confidential Classification, submitted on May 24, 2024 (document number 04171-2024), regarding its Response to OPC's Third Set of Interrogatories (Nos. 63-70) and Third Request for Production of Documents (Nos. 29-32), this 23<sup>rd</sup> day of July, 2024

Respectfully submitted,

/s/ Dianne M. Triplett

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Attorneys for Duke Energy Florida, LLC

## **CERTIFICATE OF SERVICE**

*Docket No. 20240025-EI*

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 23<sup>rd</sup> 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 24, 2024

**AFFIDAVIT OF REGINALD D. ANDERSON IN SUPPORT OF  
DUKE ENERGY FLORIDA, LLC'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

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

2. I am employed by DEF as Vice President, Power Generation.

3. As Vice President of DEF's Power Generation organization, I am responsible for providing overall leadership and strategic and tactical planning over employees in DEF's Power Generation organization. In this role, I oversee generation projects, major maintenance programs,

outage and project management, fleet retirement strategy, and workforce planning (including departmental staffing and long-term strategies such as organizational alignment, design, retention, and inclusion). I am responsible for billions of dollars in assets including capital and operating and maintenance (“O&M”) budgets, and I lead the development of regional succession planning.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel’s (“OPC”) Third Request for Production of Documents, Question 29 (Generation). A detailed description of the confidential information at issue is contained in Exhibit A to DEF’s Request and is outlined in DEF’s Justification Matrix that is attached to DEF’s Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to OPC’s Third Request for Production of Documents, Question 29 (Generation), contain confidential information. Specifically, those documents contain pricing information relating to contracts for goods and services. Disclosure of this non-public information could alter contractors’ behavior to the detriment of DEF, its customers, and its affiliates. Thus, absent confidential classification, DEF and its affiliates’ efforts to contract for goods and services on favorable terms may be impaired. In addition, the documents in question contain internal sensitive business information regarding future projects and capital investments. That information relates to DEF’s competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF’s ability to compete in the marketplace.

6. Upon receipt of confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist DEF. At no time

since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 29<sup>th</sup> day of May, 2024.



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

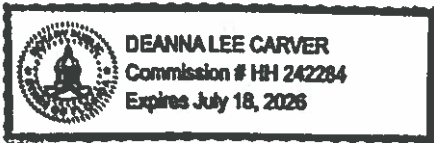
THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 29<sup>th</sup> day of May, 2024 by Reginald D. Anderson. He is personally known to me or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.



(Signature)  
Deanna Lee Carver  
(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF FL  
July 18, 2026  
(Commission Expiration Date)



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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: May 24, 2024

**AFFIDAVIT OF 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”) Third Request for Production of Documents, Question 29 (Solar), and Third Set of Interrogatories, Question 65 (Solar). 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 Third Request for Production of Documents, Question 29 (Solar), and Third Set of Interrogatories, Question 65 (Solar), 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 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 18<sup>th</sup> 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 DA 6066162  
\_\_\_\_\_  
(Serial Number, If Any)



**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20240025-EI

Dated: May 24, 2024

**AFFIDAVIT OF EDWARD L. SCOTT IN SUPPORT OF  
DUKE ENERGY FLORIDA, LLC'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

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

2. I am employed by Duke Energy as General Manager of Transmission Planning.

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

strategies and assessments, joint studies with adjacent interconnected utilities and RTOs/ISOs and analysis and studies as required under the FERC Open Access Transmission Tariff (OATT). I am also responsible for ensuring compliance to all safety, environmental and regulatory policies and business practices. I also serve as Vice Chair on the Florida Reliability Coordinating Council's ("FRCC") Operating Committee.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Third Request for Production of Documents, Question 31 (Transmission), and Third Set of Interrogatories, Question 68. 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 Third Request for Production of Documents, Question 31 (Transmission), and Third Set of Interrogatories, Question 68, contain confidential information. Specifically, these documents contain pricing information relating to contracts for goods and services (along with other terms of such contracts). Disclosure of this non-public information could alter contractors' behavior to the detriment of DEF, its customers, and its affiliates. Thus, absent confidential classification, DEF's efforts to contract for goods and services on favorable terms may be impaired. In addition, the documents in question contain details about the location and nature of future transmission planning projects. Disclosure of that information could pose significant security risks to DEF, its customers, and the transmission grid.

6. Upon receipt of confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided,

including restricting access to those persons who need the information to assist DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

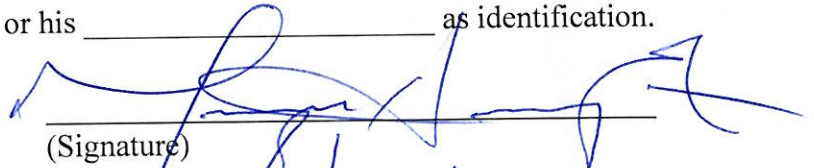
Further affiant sayeth not.

Dated the 19<sup>th</sup> day of June, 2024.



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

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



(Signature)  
Monique Hampton  
(Printed Name)

(AFFIX NOTARIAL SEAL)

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

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

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

