

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20240025-EI

Dated: July 30, 2024

**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 Shannon Caldwell, Vanessa Goff, Brian Lloyd, and John Panizza, in support of DEF's Amended Request for Confidential Classification, submitted on May 29, 2024 (document number 04342-2024), regarding its Response to OPC's Seventh Set of Interrogatories (Nos. 144-210) and Seventh Request for Production of Documents (Nos. 66-77), this 30th day of July, 2024

Respectfully submitted,

/s/ Dianne M. Triplett

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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 30th 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: July 1, 2024

**AFFIDAVIT OF SHANNON CALDWELL 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 Shannon Caldwell, who being first duly sworn, on oath deposes and says that:

1. My name is Shannon Caldwell. 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 a Director of Compensation of Duke Energy Business Services LLC. That section provides various administrative and other services to Duke Energy, DEF, and other affiliated companies of Duke Energy Corporation.

3. As the Director of Compensation, I am responsible for broad-based compensation for Duke Energy, including all of Duke Energy's affiliated regulated and non-regulated companies, like DEF. I am responsible for compensation design and strategy, management of key vendor

relationships, compensation administration and compliance.

4. DEF is seeking confidential classification for information contained in documents produced in response to the Office of Public Counsel's ("OPC") Seventh Request for Production of Documents, Question 66. 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 information for the reasons set forth below.

5. Documents produced in response to the OPC's Seventh Request for Production of Documents, Question 66, contain internal sensitive business information that relates to internal compensation procedures and incentive plans, the disclosure of which would impair the efforts of DEF 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 (and, thus, to contract for goods and services on favorable terms).

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 1 day of July, 2024.

Shannon Caldwell

(Signature)

Shannon Caldwell

Director, Compensation

Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 1st day of July, 2024 by Shannon Caldwell. She is personally known to me or has produced her _____ driver's license, or her _____ as identification.

Felicia Sueann Ritty

(Signature)

Felicia Sueann Ritty

(Printed Name)

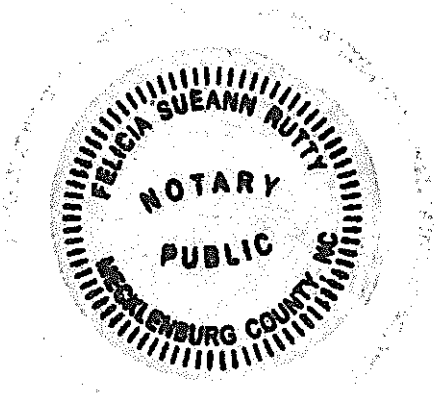
NOTARY PUBLIC, STATE OF North Carolina

10/1/2028

(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 28, 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”) Seventh Set of Interrogatories, Question 186. 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 response to OPC’s Seventh Set of Interrogatories, Question 186, 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 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

01DA6066162
(Serial Number, If Any)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: May 28, 2024

**AFFIDAVIT OF 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") Seventh Request for Production of Documents, Question 68, and OPC's Seventh Set of Interrogatories, Questions 155, 158, 160, and 166. A detailed description of the confidential information at issue is contained in Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to OPC's Seventh Request for Production of Documents, Question 68, contain confidential information. Specifically, those documents contain internal sensitive business information that relates to internal compensation procedures and amounts, 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 (and, thus, to contract for goods and services on favorable terms).

6. Documents produced in response to OPC's Seventh Set of Interrogatories, Questions 155, 158, 160, and 166, 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 expenditures. 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

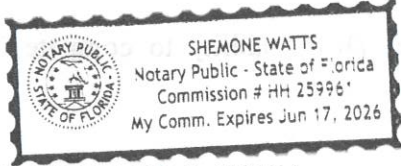
Further affiant sayeth not.

Dated the 17 day of June, 2024.



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

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



(AFFIX NOTARIAL SEAL)

Shemone Watts
(Signature)

Shemone Watts
(Printed Name)

NOTARY PUBLIC, STATE OF Florida

6/17/2026
(Commission Expiration Date)

HH 259961
(Serial Number, If Any)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: May 28, 2024

**AFFIDAVIT OF JOHN R. PANIZZA IN SUPPORT OF
DUKE ENERGY FLORIDA, LLC'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

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

2. I am employed by Duke Energy Business Services, LLC ("DEBS") as Director, Tax Operations. DEBS provides various administrative and other services to DEF and other affiliated companies of Duke Energy Corporation.

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

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

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Seventh Set of Interrogatories, Questions 206-208. A detailed description of the confidential information at issue is contained in Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to OPC's Seventh Set of Interrogatories, Questions 206-208, contain confidential information. Specifically, those documents contain internal sensitive business information relating to DEF's actual and estimated property tax rates. That information relates to DEF's competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF's ability to compete in the marketplace.

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

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 12th day of June, 2024.

John R. Panizza

(Signature)

John R. Panizza

Director, Tax Operations

Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 12th day of June, 2024 by John R. Panizza. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.

Teresa Ray

(Signature)

Teresa Ray

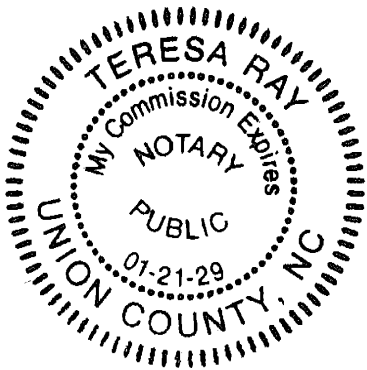
(Printed Name)

NOTARY PUBLIC, STATE OF NC

01/21/29

(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)



(Serial Number, If Any)