

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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COMMISSION CLERK

In re: Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project, by Duke Energy Florida, Inc.

DOCKET NO.: 100437-EI

Filed: May 29, 2013

claim of confidentiality notice of intent

X request for confidentiality filed by OPC

REDACTED

DUKE ENERGY FLORIDA, INC.'S

For DN 02960-18 ^{which} **REVISED** FIFTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

is in locked storage. You must be authorized to view this DN.-CLK

Duke Energy Florida ("DEF" or the "Company"), pursuant to Section 366.093, Fla. Stats., and Rule 25-22.006, Florida Administrative Code, files this Revised Fifth Request for Confidential Classification for confidential portions of DEF's revised responses to Staff's Fifth Request for Production (Nos. 16-18).

Specifically, portions of the documents responsive to Staff's Request Nos. 16 and 17 contain sensitive business information such as projected costs and cash flows, the disclosure of which would adversely impact DEF's competitive business interests. Accordingly, DEF hereby submits the following.

Basis for Confidential Classification

Subsection 366.093(1), Florida Statutes, provides that "any records received by the Commission which are shown and found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from [the Public Records Act]." §366.093(1), Fla. Stats. Proprietary confidential business information means information that is (i) intended to be and is treated as private confidential information by the Company, (ii)

because disclosure of the information would cause harm, (iii) either to the Company's ratepayers

- COM _____
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DEF is revising this request to remove designation of confidential from certain portions of documents 13CNT-FPSCPODS5-16-000091 through 13CNT-FPSCPODS5-16-000111, 13CNT-FPSCPODS5-16-000115, 13CNT-FPSCPODS5-16-000116, and 13CNT-FPSCPODS5-16-000131.

DOCUMENT NUMBER-DATE

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or the Company's business operation, and (iv) the information has not been voluntarily disclosed to the public. §366.093(3), Fla. Stats. Specifically, "information relating to competitive interests" is defined as proprietary confidential business information if the disclosure of such information "would impair the competitive business of the provider of the information." §366.093(3)(e), Fla. Stats.

The aforementioned portions of DEF's revised responses to Staff's Fifth Request for Production should be afforded confidential classification because these portions contain proprietary confidential business information. Public disclosure of the information in question would impair DEF's competitive business interests.

Staff's Fifth Request for Production Nos. 16 and 17

Portions of DEF's revised response to Staff's Request Nos. 16 and 17 should be afforded confidential treatment for the reasons set forth in the Affidavit of R. Alexander Glenn ("Alex Glenn") filed April 5, 2013 (Document No. 01713-13) in support of DEF's Fifth Request for Confidential Classification and for the following reasons. Portions of the documents responsive to Request No. 16 and Request No. 17 contain proprietary confidential business information provided to the Company's Board of Directors related to confidential cost analysis; projected financial impacts related to repair costs; projected and estimated replacement power costs; and projected and estimated insurance reimbursements, the disclosure of which would adversely impact DEF's competitive business interests by disclosing sensitive business information. See § 366.093(3)(e), F.S.; Affidavit of Alex Glenn at ¶ 5. For example, if DEF's competitors and counterparties were made aware of such information, they may adjust their behavior in relevant markets and venues. Id. Accordingly, such information constitutes "proprietary confidential

business information” which is exempt from disclosure under the Public Records Act pursuant to Section 366.093(1), F.S.

Strict procedures are established and followed to maintain the confidentiality of the terms of the confidential documents and information at issue, including restricting access to those persons who need the information and documents to assist the Company. See Affidavit of Alex Glenn at ¶ 6. At no time has the Company publicly disclosed the confidential information or documents at issue. Id. The Company has treated and continues to treat the information and documents at issue as confidential. Id.

Conclusion

Certain portions of DEF’s revised responses to Staff’s Fifth Request for Production fit the statutory definition of proprietary confidential business information under Section 366.093 and Rule 25-22.006, Florida Administrative Code, and that information should be afforded confidential classification. In support of this motion, DEF has enclosed the following:

(1). A separate, sealed envelope containing one copy of the confidential Appendix A to DEF’s *Revised* Request for Confidential Classification for which DEF intends to request confidential classification with the appropriate section, pages, or lines containing the confidential information highlighted. **This information should be accorded confidential treatment pending a decision on DEF’s request by the Florida Public Service Commission;**

(2). Two copies of the confidential responses with the information for which DEF intends to request confidential classification redacted by section, page, or lines where appropriate as Appendix B; and

(3). A justification matrix supporting DEF’s *revised* request for confidential classification of the highlighted information contained in confidential Appendix A, as Appendix C.

WHEREFORE, DEF respectfully requests that certain portions of DEF's revised responses to Staff's Fifth Request for Production, Requests No. 16 and 17, described specifically in Attachment C, be classified as confidential for the reasons set forth above.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and U.S. Mail this 19th day of May, 2013.



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DUKE ENERGY FLORIDA

**In re: Examination of the outage and
replacement fuel/power costs associated with the
CR3 steam generator replacement project, by
Duke Energy Florida, Inc.
Docket 100437-EI**

REVISED

Fifth Request for Confidential Classification

Exhibit B

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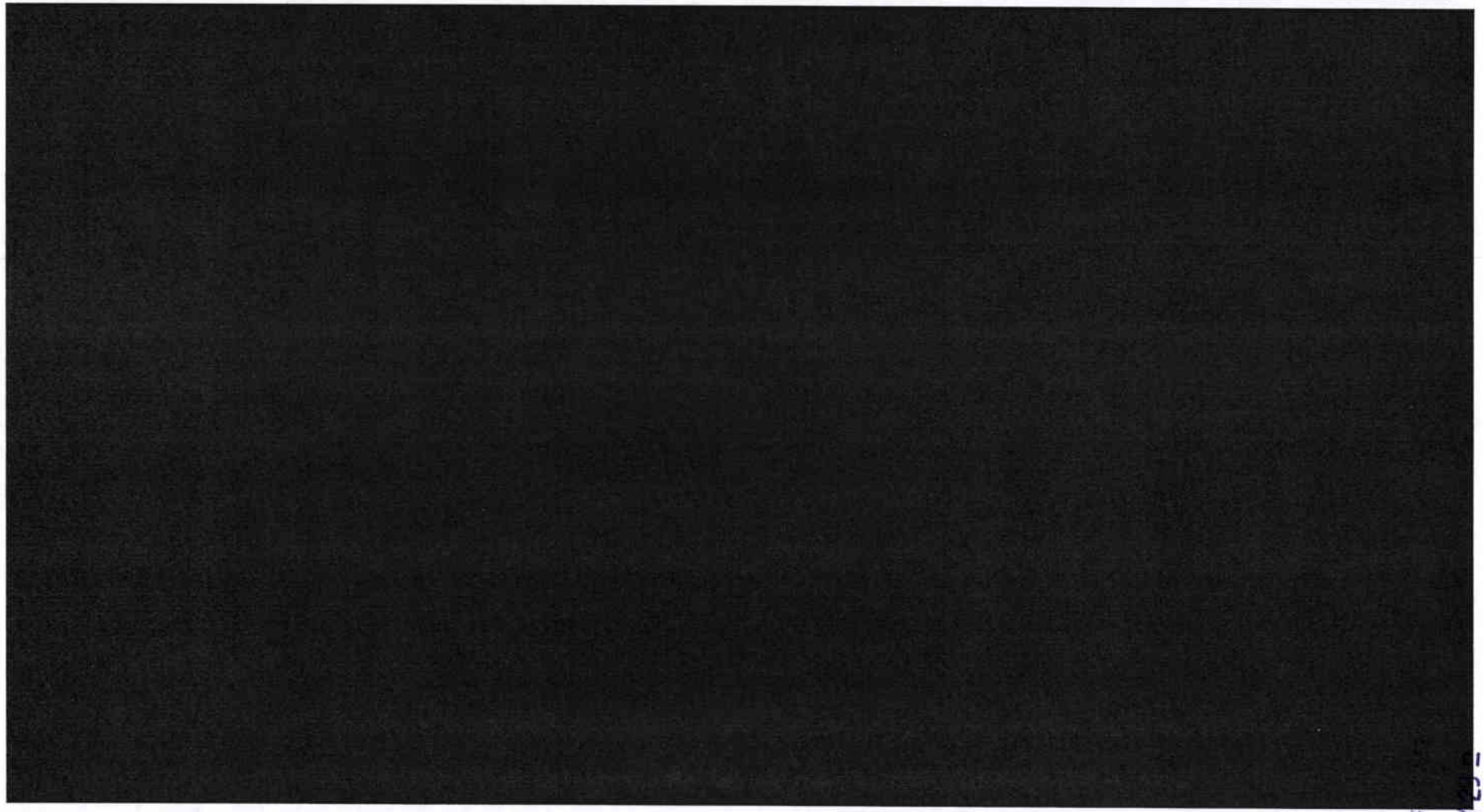
DOCUMENT NUMBER-DATE

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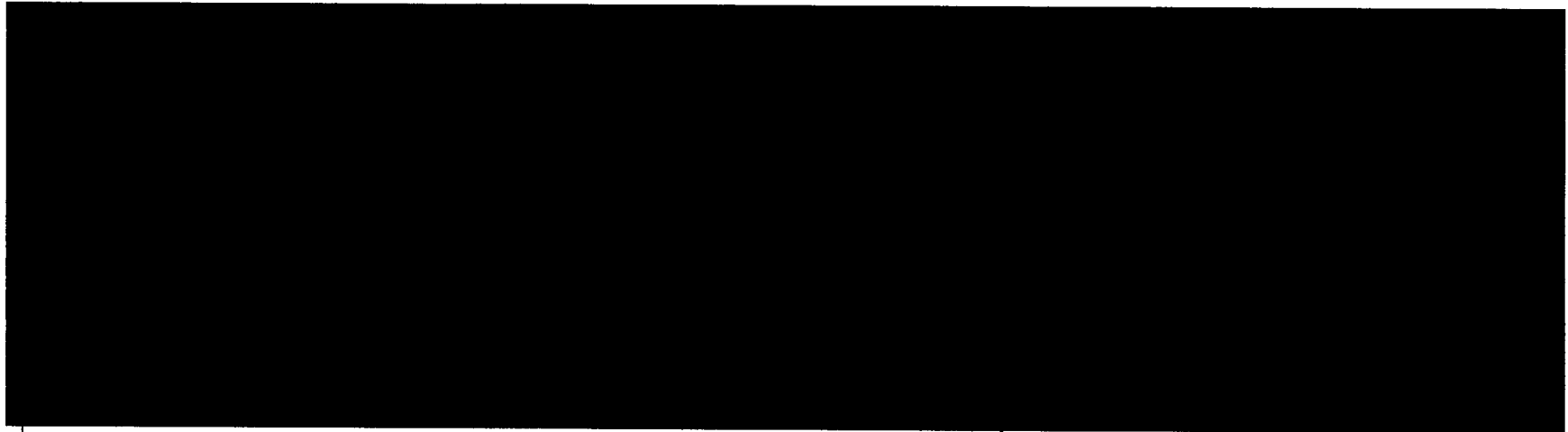
Key Strategic Issues/Decisions – PEF

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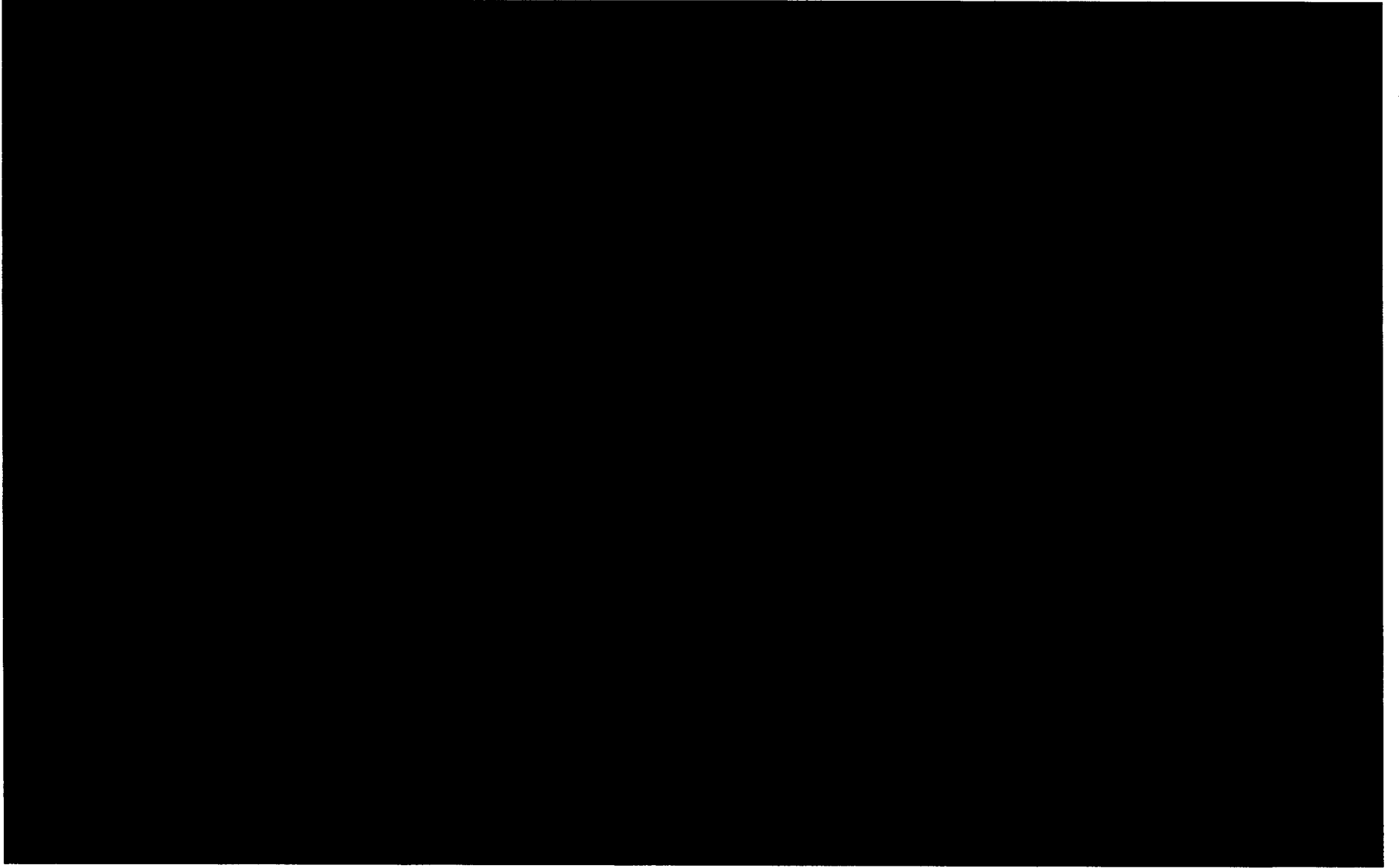


DOCUMENT NUMBER
02959 MAY 23
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Strategic Financial Priorities



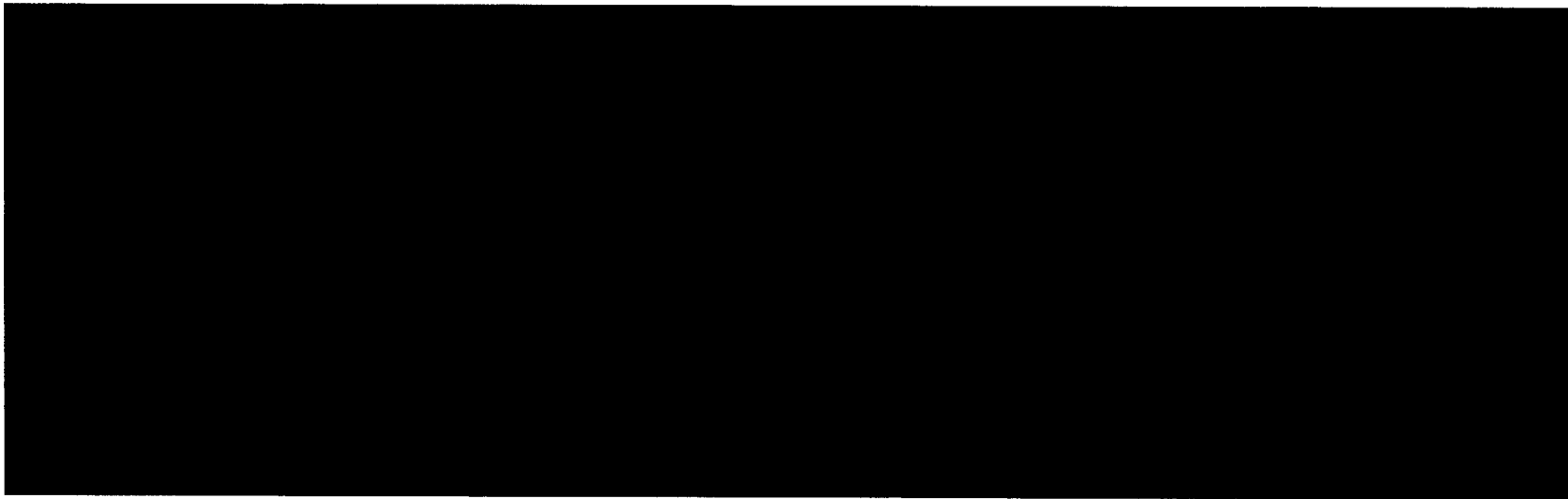
Credit Metrics and Preservation of Ratings



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Focus Area:
Initiative Status

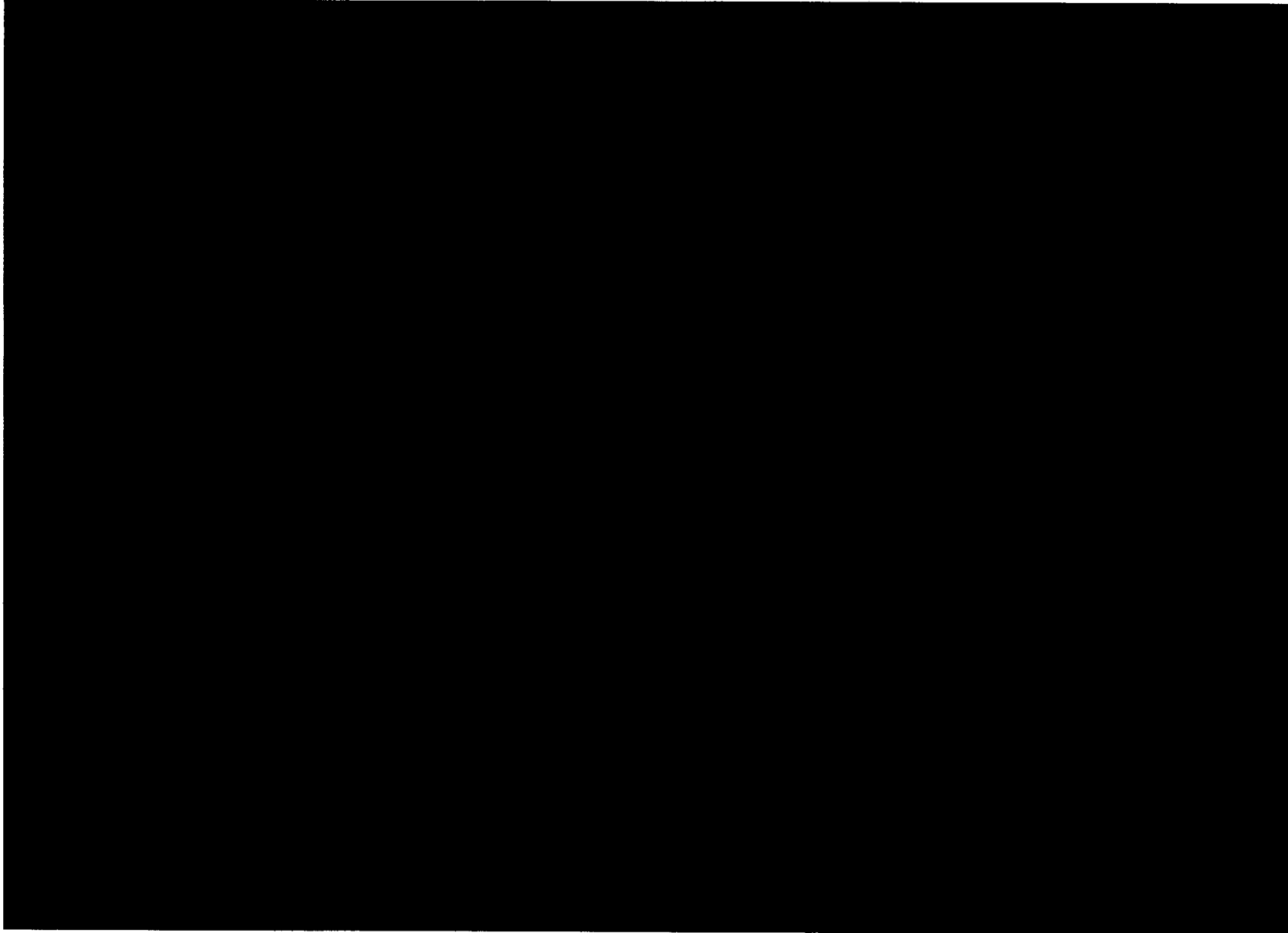
Area	Status	Notes
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Focus Area:

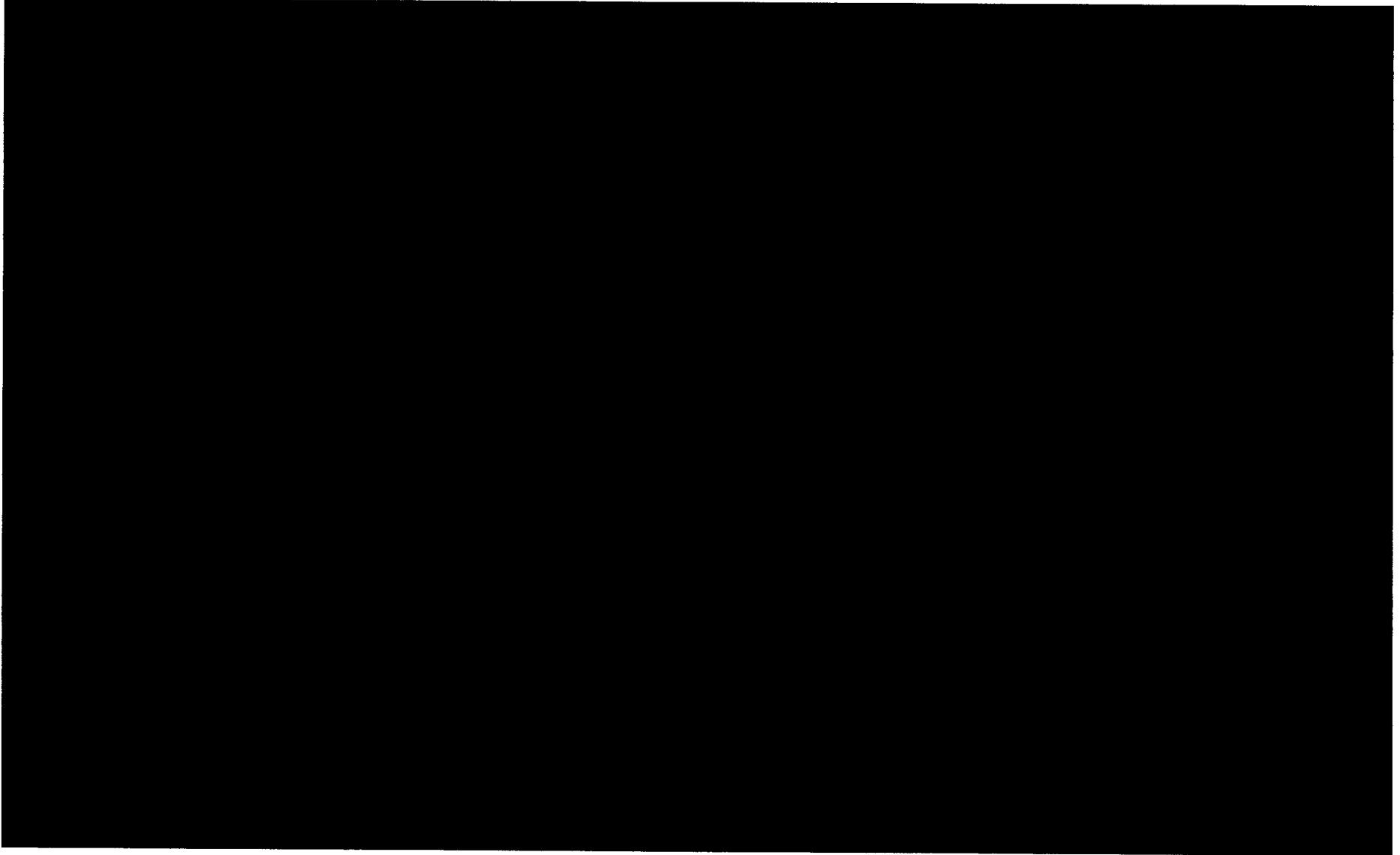
Initiative Status



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PEF Capital Project Status - Major Projects

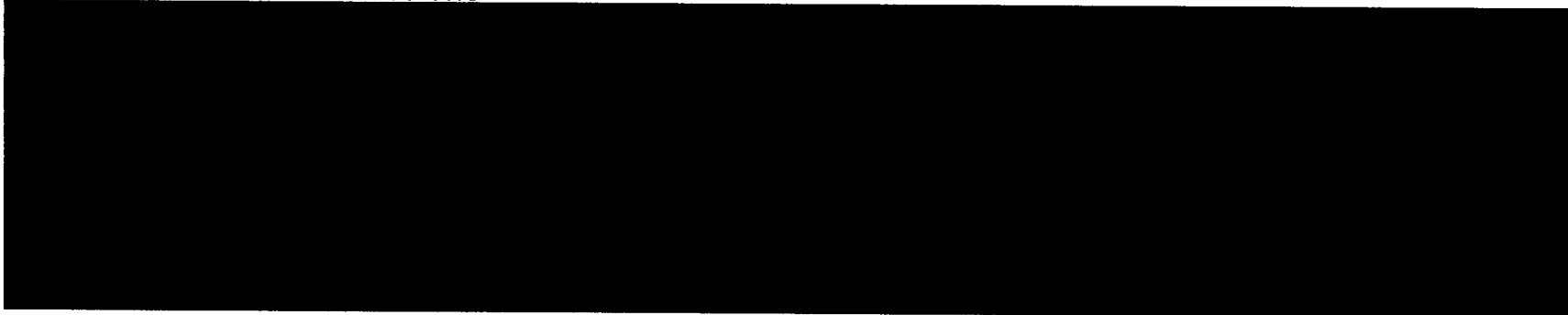
(\$ in millions)





Regulatory Process

- Delamination Docket Issues
 - With a retirement announcement, FPSC CR3 delamination docket Phase II would become ripe
 - DEF would likely file a petition and testimony in February, with possible hearing in April
 - Prudence of Company's decision to retire CR3 would be reviewed
 - Signatories to settlement barred from challenging prudence
 - Other non-signatories who establish standing could challenge prudence
 - Likely claim that any NEIL settlement, if approved, is imprudent, arguing that PEF should have pursued arbitration
- Nuclear Cost Recovery Clause Docket Issues
 - March 1, 2013, filing indicating that the Company has cancelled the CR3 extended power uprate project
 - May 1, 2013, filing regarding reasonableness and prudence of EPU termination costs (or deferral of this issue until Commission determines prudence of CR3 retirement issue)
 - NCRC provisions provide recovery under abandonment provisions
 - Under current schedule, customer collection of EPU costs would begin in 2014
- Settlement Discussions





Regulatory Recovery and Other Financial Considerations

- Recovery of retail allocation of CR3 investment at 12/31/12 and related deferred costs are generally provided for under the 2012 regulatory settlement at 70% of allowed ROE
 - Repair and other costs incurred after February 2012 (estimated at \$220M) are still subject to prudence review
 - Retail allocation of Uprate investment is presently included in Nuclear Cost Recovery (NCRC), subject to ongoing review by the Commission
 - Levy investment of \$430M is also included in annual NCRC proceedings
- Replacement power regulatory asset will be presented for recovery through the annual fuel clause. Ongoing, annual replacement power costs are estimated at \$200-300M
- SAFSTOR investments will be capitalized or deferred for recovery beginning in 2017
- Potential for additional accounting entries, which will generally be recognized as an increase in goodwill. Goodwill valuation will require ongoing review

CR3 Assets (\$ in millions)	
Original Investment	\$ 410
Steam Generator	405
Nuclear Fuel	265
Uprate	290
Containment Repair, Other CWIP & Inventory	320
CR3 Portion of Reg Asset- Cost of Removal Reserve	105
Total CR3 Assets as of 12/31/2012	1,795
Estimated AFUDC Recorded 2013-17 on CR3	385
Regulatory Asset - Replacement Power (Proj 12/2013)	330
Future Investments - SAFSTOR Prep	147
Total CR3 Assets - Projected	\$ 2,657

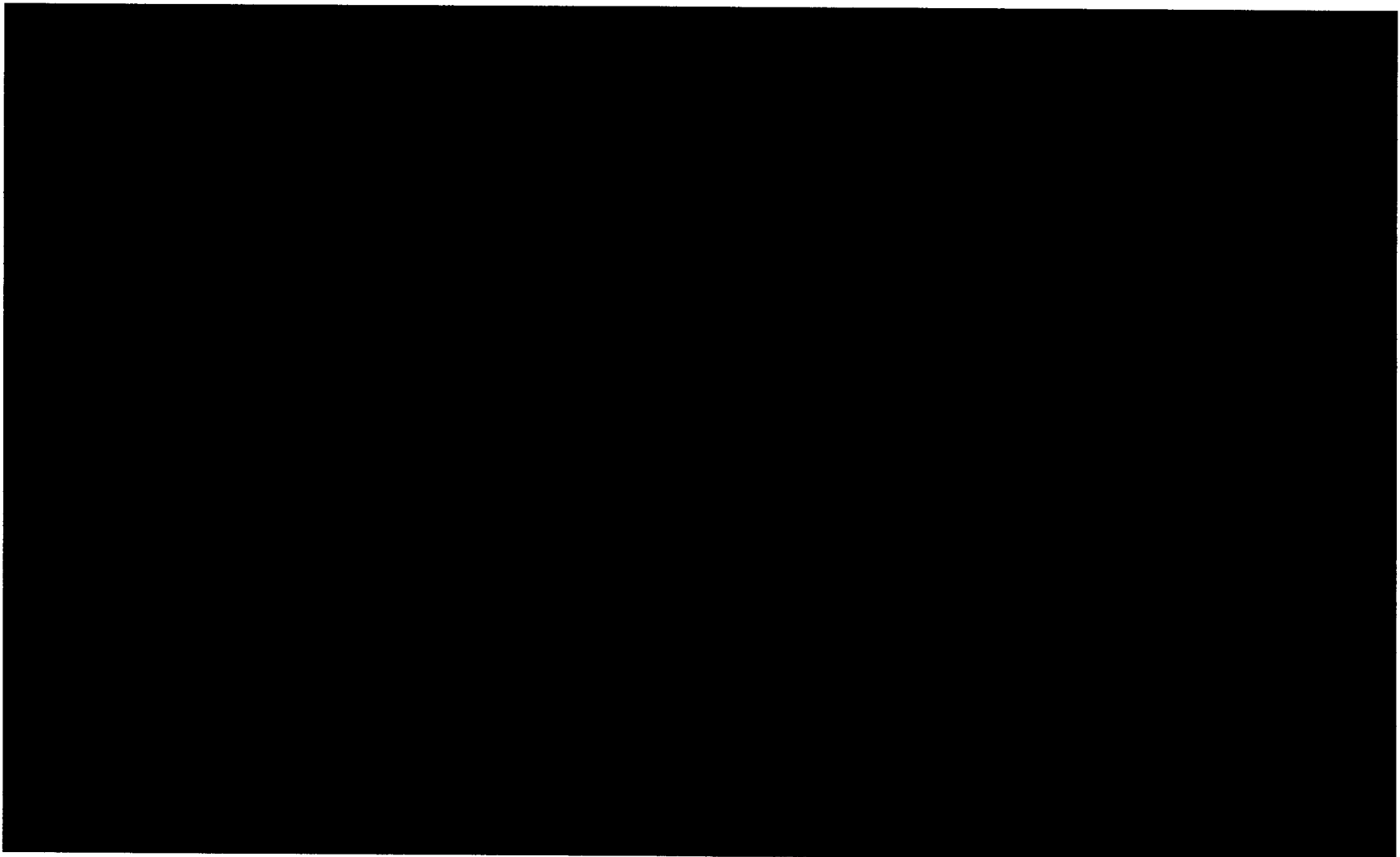




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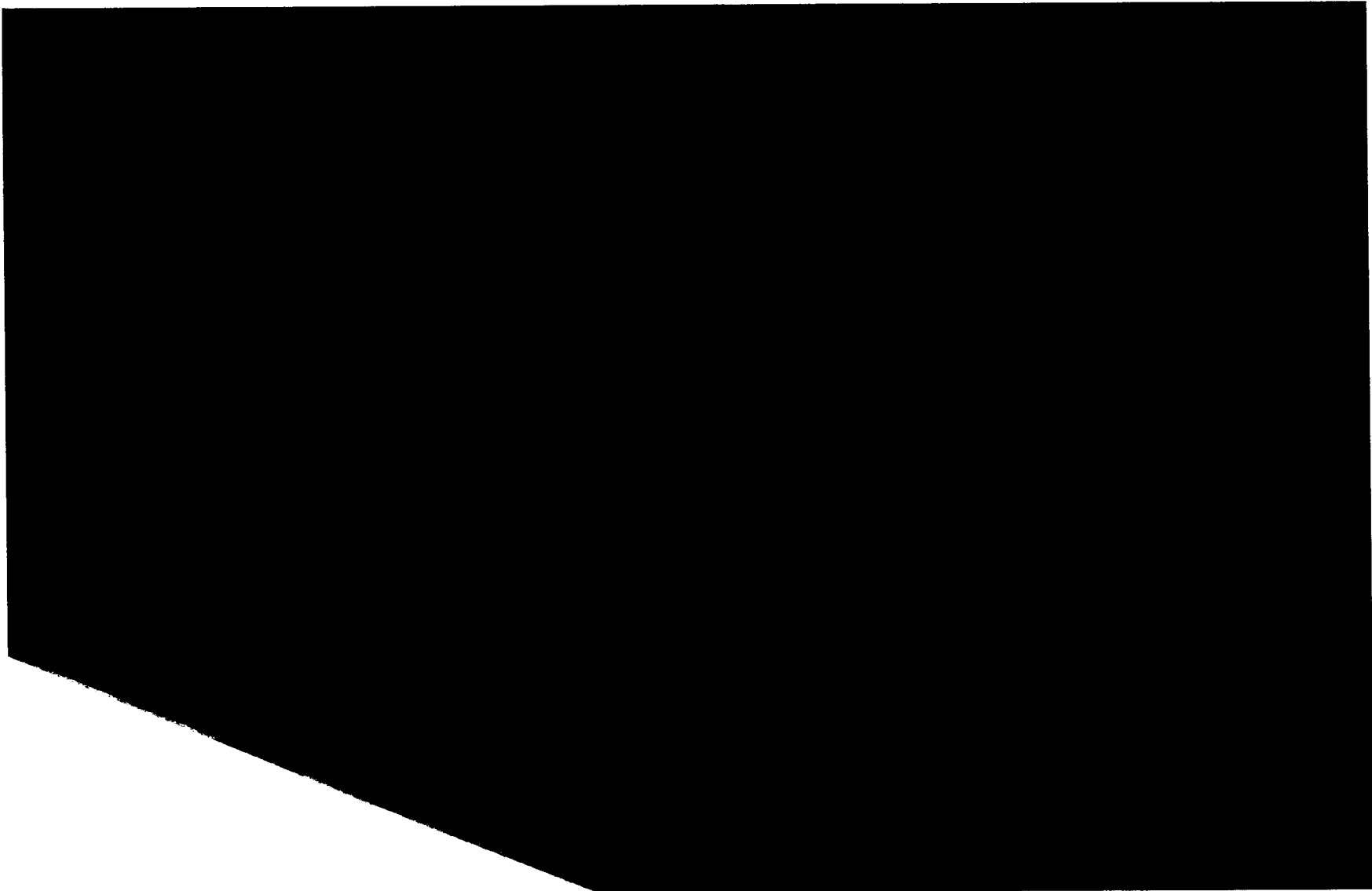
Implications to 2013 Operating Plan



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Credit Metric Considerations, Reflecting Retirement

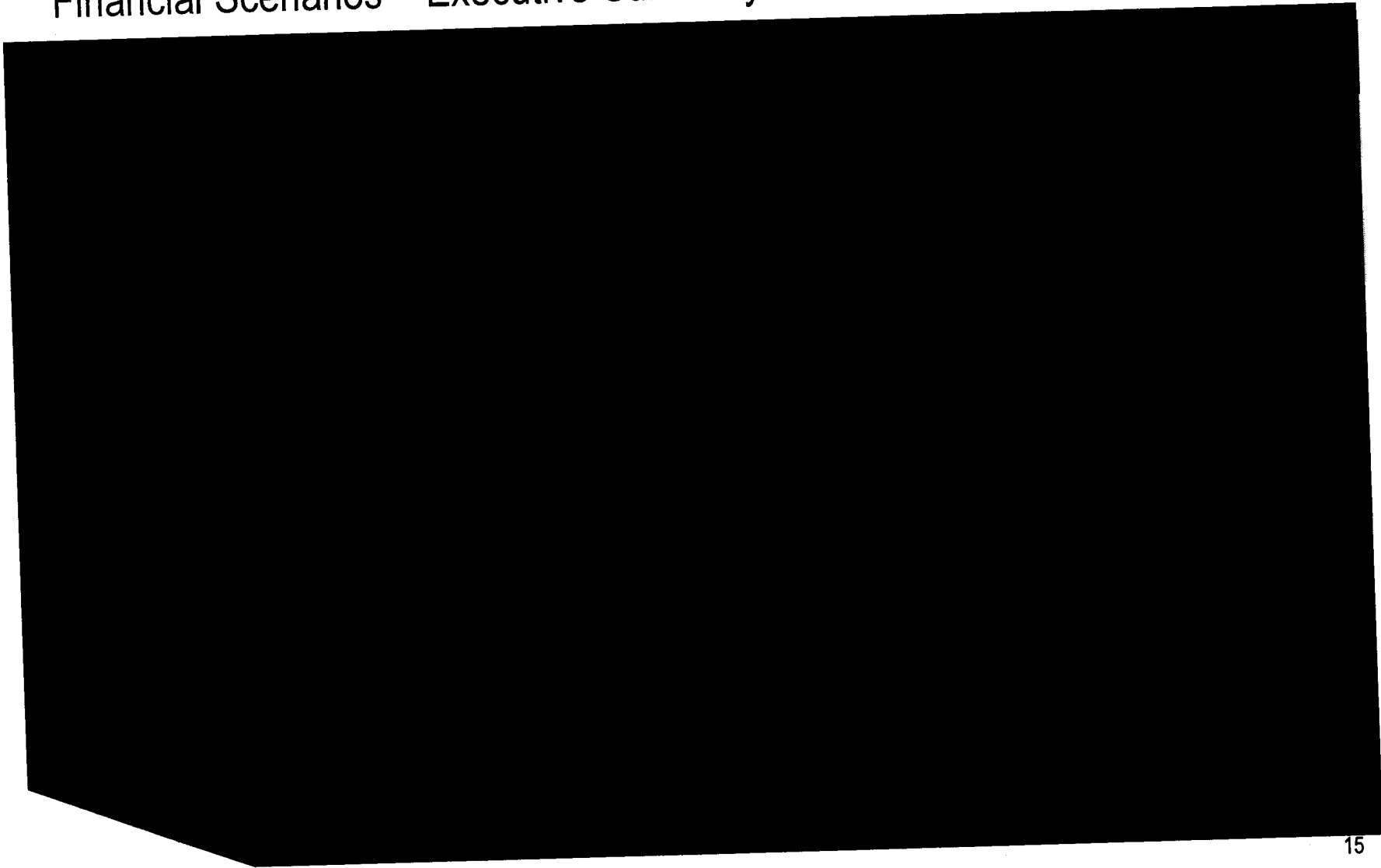


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COMBINING OUR STRENGTHS. CREATING OUR FUTURE.

Financial Scenarios – Executive Summary

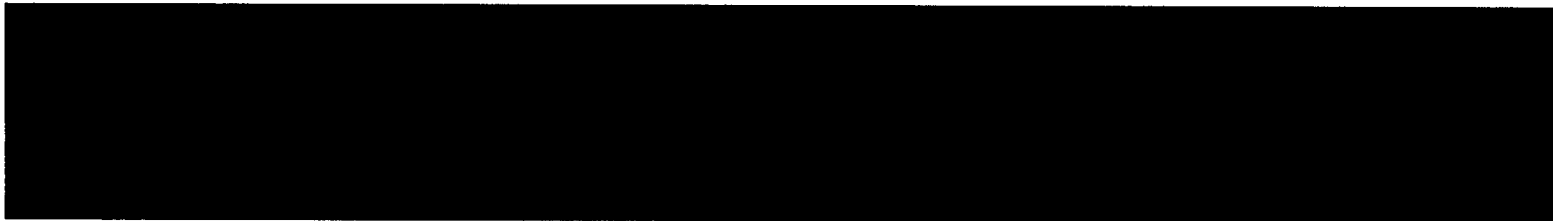




Other Considerations

- Potential disallowance risk

- Repair cases assume all repair costs not covered under NEIL insurance will be recovered from customers through rates
- The risk exists that some level of repair costs will not be recovered under NEIL or rates
- Unrecovered costs would likely result in an impairment charge and a need for additional equity financing to maintain balance sheet position



- Financial Takeaways

- Financial results need to be evaluated within the context of risks to customers and shareholders
 - Repair considerations – NEIL recovery and customer impacts are important
 - Retirement of CR3 creates near term earnings challenges and increases capacity needs
- Accounting considerations

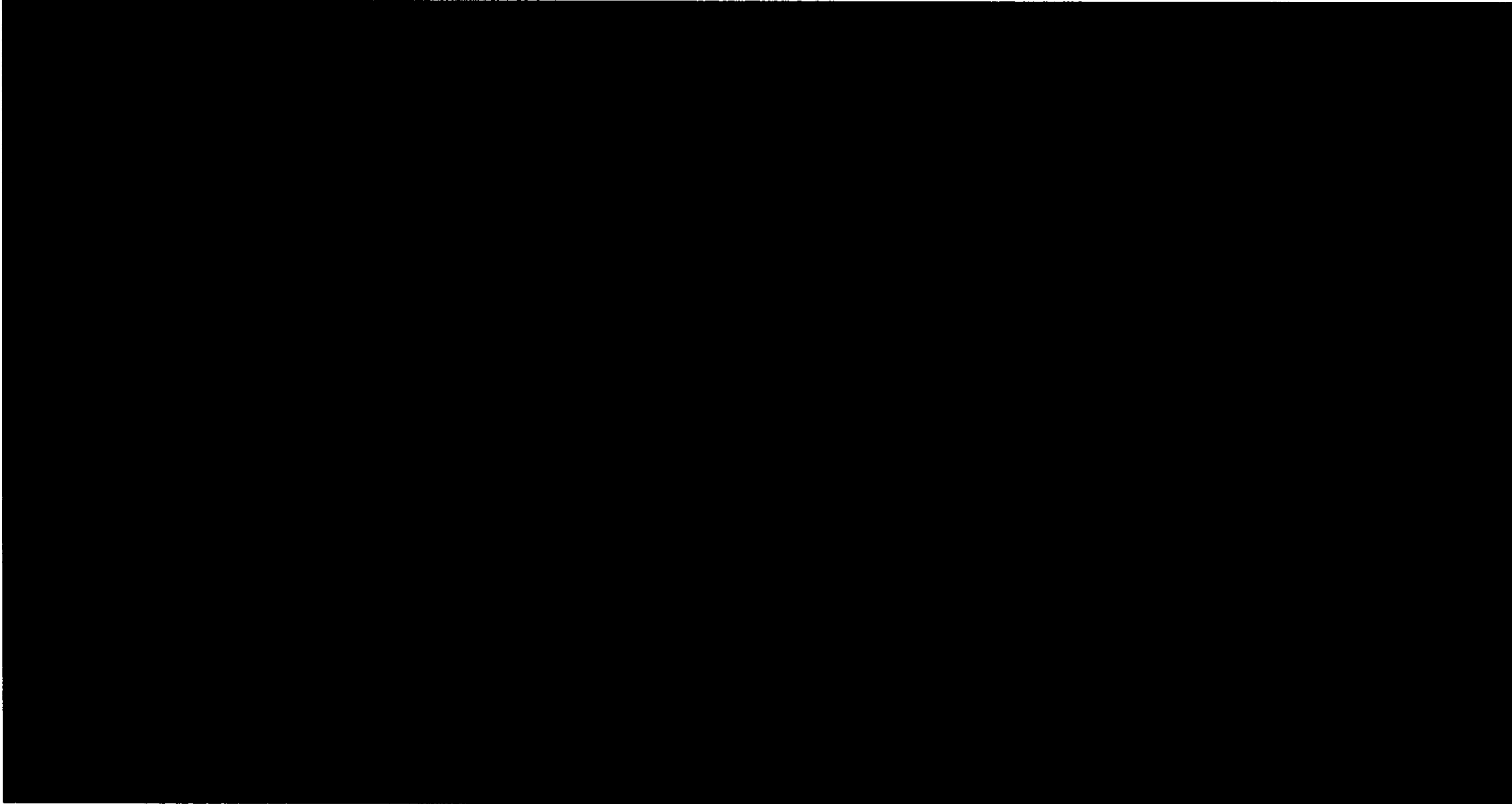


- Goodwill analysis under review

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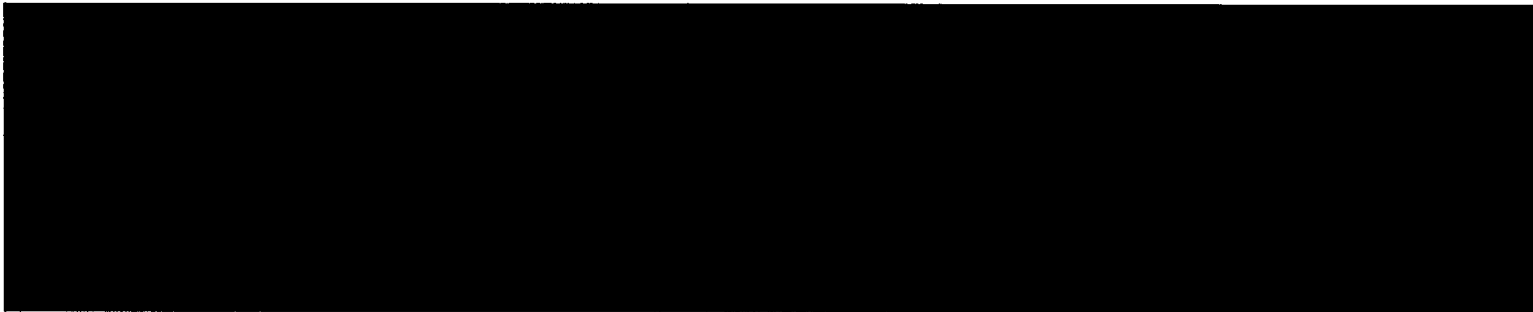
Economics of Repair / Retire for Customers Summary Results



A black and white photograph of a city skyline with several skyscrapers.

Key Accounting or Disclosure Issues

- Regulatory settlement approved in February 2012 established framework for cost recovery for repair and retire options
 - Includes a provision for Duke Energy to incur an obligation for \$100 million of replacement power if CR3 repairs do not begin before December 31, 2012
 - If repairs commence before year end, there is no replacement power obligation, even if the plant never returns to service
 - A liability for the \$100 million obligation must be established if we do not believe repairs will begin before year end
- If a decision is made to retire CR3, additional accounting implications include



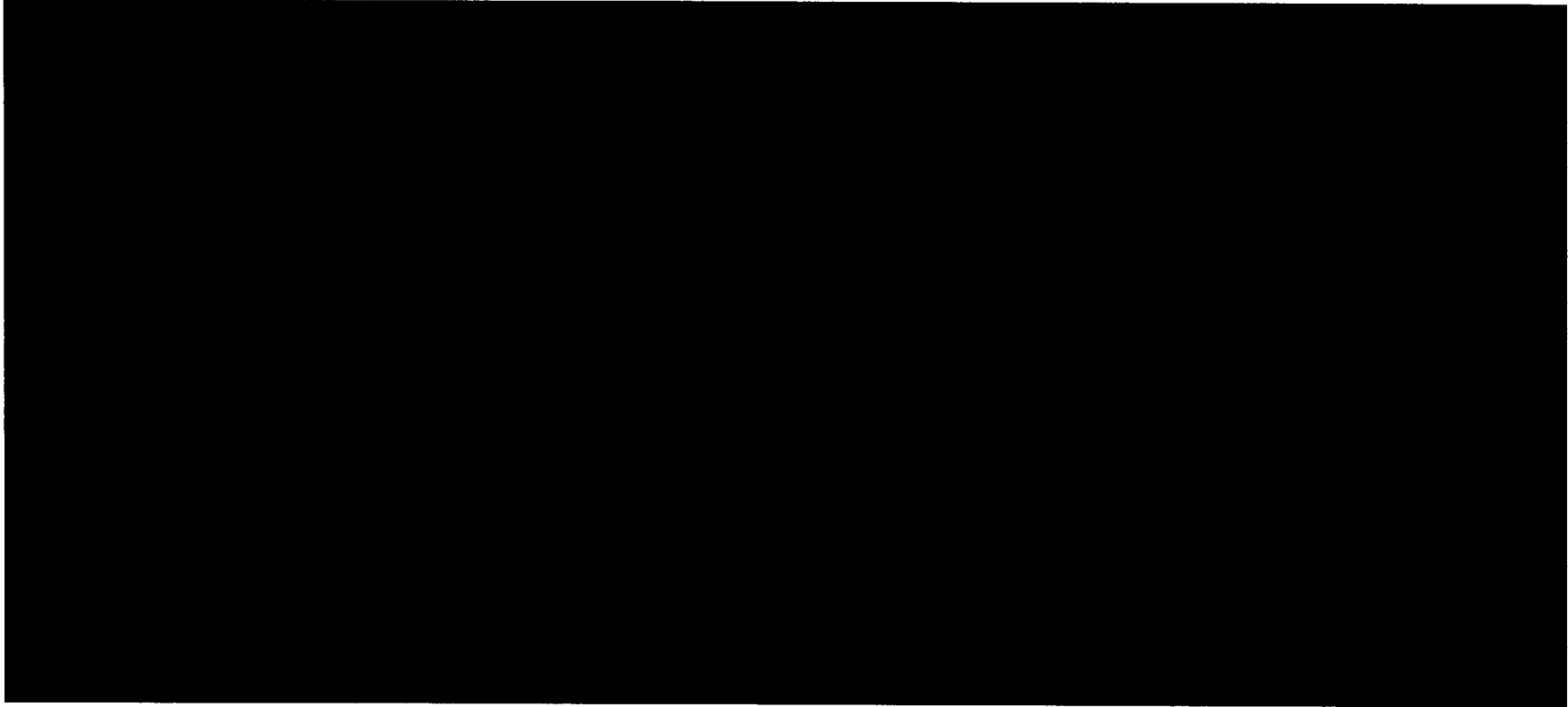
PROGRESS ENERGY FLORIDA
In re: Examination of the outage and
replacement fuel/power costs associated with the
CR3 steam generator replacement project, by
Progress Energy Florida, Inc.
Docket 100437-EI
Fifth Request for Confidential Classification

13 CNT-FPSCPODS5-16-000155
is redacted in its entirety

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Economics of Repair / Retire for Customers Summary Results



Note: figures exclude joint owner portion

PROGRESS ENERGY FLORIDA
In re: Examination of the outage and
replacement fuel/power costs associated with the
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13 CNT-FPSCPODS5-16-000170
is redacted in its entirety

PROGRESS ENERGY FLORIDA
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replacement fuel/power costs associated with the
CR3 steam generator replacement project, by
Progress Energy Florida, Inc.
Docket 100437-EI
Fifth Request for Confidential Classification

13 CNT-FPSCPODS5-16-000187
is redacted in its entirety

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replacement fuel/power costs associated with the
CR3 steam generator replacement project, by
Progress Energy Florida, Inc.
Docket 100437-EI
Fifth Request for Confidential Classification

13CNT-FPSCPODS5-17-000001
through
13CNT-FPSCPODS5-17-000014
are redacted in their entirety

PROGRESS ENERGY FLORIDA
In re: Examination of the outage and
replacement fuel/power costs associated with the
CR3 steam generator replacement project, by
Progress Energy Florida, Inc.
Docket 100437-EI
Fifth Request for Confidential Classification

13CNT-FPSCPODS5-17-000050
through
13CNT-FPSCPODS5-17-000053
are redacted in their entirety

PROGRESS ENERGY FLORIDA
In re: Examination of the outage and
replacement fuel/power costs associated with the
CR3 steam generator replacement project, by
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Docket 100437-EI
Fifth Request for Confidential Classification

13CNT-FPSCPODS5-17-000072
Is redacted in its entirety

PROGRESS ENERGY FLORIDA

**In re: Examination of the outage and
replacement fuel/power costs associated with the
CR3 steam generator replacement project, by
Progress Energy Florida, Inc.**

Docket 100437-EI

Fifth Request for Confidential Classification

13CNT-FPSCPODS5-17-000077

through

13CNT-FPSCPODS5-17-000078

are redacted in their entirety

PROGRESS ENERGY FLORIDA
In re: Examination of the outage and
replacement fuel/power costs associated with the
CR3 steam generator replacement project, by
Progress Energy Florida, Inc.
Docket 100437-EI
Fifth Request for Confidential Classification

13CNT-FPSCPODS5-17-000086
is redacted in its entirety

DUKE ENERGY FLORIDA DOCKET 100437-EI
Revised Fifth Request for Confidential Classification
Confidentiality Justification Matrix

ATTACHMENT C

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000006	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000008 through 13CNT-FPSCPODS5-16-000009	All information on pages excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000013	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000034	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business

DUKE ENERGY FLORIDA DOCKET 100437-EI
Revised Fifth Request for Confidential Classification
Confidentiality Justification Matrix

ATTACHMENT C

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
000034		interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000037	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000113	Last five bullet points on page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000114	Last three bullet points on page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000115 through 13CNT-FPSCPODS5-16-000116	All information on pages exclusive of headings	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.

DUKE ENERGY FLORIDA DOCKET 100437-EI
Revised Fifth Request for Confidential Classification
Confidentiality Justification Matrix

ATTACHMENT C

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000131	All information on pages excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000132	5 th point bullet in its entirety; 2 nd to last bullet point in its entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000146	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000151	Last 5 bullet points in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos.	Entire page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information

DUKE ENERGY FLORIDA DOCKET 100437-EI
Revised Fifth Request for Confidential Classification
Confidentiality Justification Matrix

ATTACHMENT C

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
13CNT-FPSCPODS5-16-000155		relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000168	All information on pages excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000170	Entire page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000187	Entire page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000001 through 13CNT-FPSCPODS5-17-000014	Entire pages	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of

DUKE ENERGY FLORIDA DOCKET 100437-EI
Revised Fifth Request for Confidential Classification
Confidentiality Justification Matrix

ATTACHMENT C

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000015	1 st four paragraphs in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000017	1 st responsive paragraph on page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000020	From second to last paragraph to end of page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000021	1 st three lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production	1 st bullet point on page in its entirety	§366.093(3)(e), Fla. Stat. The document portions in question

DUKE ENERGY FLORIDA DOCKET 100437-EI
Revised Fifth Request for Confidential Classification
Confidentiality Justification Matrix

ATTACHMENT C

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000023		contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000025	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000026	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000030	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000050 through 13CNT-FPSCPODS5-000053	Entire pages	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000054	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000055	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000059	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000061	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's	All responsive lines on	§366.093(3)(e), Fla. Stat.

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000067	page in their entirety	The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000072	Entire page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000073	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000076	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000077 through 13CNT-	Entire pages	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
FPSCPODS5-17-000078		would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000079	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000081 through 13CNT-FPSCPODS5-17-000082	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000085	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000086	Entire page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000087	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000089	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000090	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000091	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.