

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Cost Effective Generation Alternative)
to Meet Need Prior to 2018 for Duke)
Energy Florida, Inc.)

DOCKET NO. 140111-EI
Submitted for filing: July 7, 2014

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COMMISSION
CLERK

REDACTED

**DUKE ENERGY FLORIDA, INC.'S SECOND REQUEST FOR CONFIDENTIAL
CLASSIFICATION REGARDING PORTIONS OF RESPONSES TO CALPINE
CONSTRUCTION FINANCE COMPANY, L.P.'S FIRST SET OF INTERROGATORIES
AND FIRST REQUEST FOR PRODUCTION**

Duke Energy Florida, Inc. ("DEF" or the "Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(3), Florida Administrative Code ("F.A.C."), files this Request for Confidential Classification Regarding Portions of Duke Energy Florida, Inc.'s responses to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories (Nos. 1-9) and Duke Energy Florida, Inc.'s responses to Calpine Construction Finance Company, L.P.'s First Request for Production of Documents (No. 1). Specifically, DEF is seeking confidential classification of its response to Interrogatories No. 2 and 6i and documents responsive to Interrogatories Nos. 5, 6 and 7. Documents responsive to Calpine Construction Finance Company, L.P.'s First Request for Production of Documents (No. 1) are duplicative of the documents provided in response to Interrogatories Nos. 5, 6 and 7. An unredacted version of the documents discussed above are being filed under seal with the Commission as Appendix A on a confidential basis to keep the competitive business information in those documents confidential.

With respect to the confidential information contained in the responses to Calpine's discovery requests, DEF filed its Notice of Intent to Request Confidential Classification on June 16, 2014 (Document No. 03031-14). Pursuant to Rule 25-22.006(3), Florida Administrative Code, this request is timely. DEF hereby submits the following in support of its confidentiality request.

- COM _____
- AFD 1
- APA _____
- ECO 2
- ENG 2
- GCL 1
- IDM 1
- TEL _____
- CLK _____

BASIS FOR CONFIDENTIAL CLASSIFICATION

Section 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. Stat. 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 or the Company’s business operation, and (iv) the information has not been voluntarily disclosed to the public. § 366.093(3), Fla. Stat. Specifically, “information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms” is defined as proprietary confidential business information. § 366.093(3)(d), Fla. Stat. Additionally, subsection 366.093(3)(e) defines “information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information,” as proprietary confidential business information.

DEF is requesting confidential classification of the responsive information to Calpine’s First Set of Interrogatories to Duke Energy Florida, Inc. Nos. (1-9) and Calpine’s First Request for Production of Documents (No. 1), specifically as noted above and in the supporting affidavit of Borsch ¶ 4, because the responses contain proprietary and confidential competitive business information, internal workpapers, information reports, including information concerning contractual data and competitively sensitive commercial information and bidder data, the disclosure of which would adversely impact DEF’s competitive business interests. And, in many cases, the information constitutes trade secrets of the Company and its contract partners. Affidavit of Borsch, ¶ 5. The Company must be able to assure these vendors that sensitive

business information will be kept confidential. Indeed, most of the contracts at issue contain confidentiality provisions that prohibit the disclosure of the terms of the contract to third parties. Id. If third parties were made aware of confidential contractual terms and conditions that the Company has with other parties, they may offer DEF less competitive contractual terms and conditions in any future contractual negotiations. Without DEF's measures to maintain the confidentiality of sensitive terms in contracts between DEF and these contractors, the Company's efforts to obtain competitive contracts would be undermined. Affidavit of Borsch, ¶ 6.

Confidentiality Procedures

Strict procedures are established and followed to maintain the confidentiality of the terms of all 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 Borsch, ¶ 7.

At no time has the Company publicly disclosed the confidential information or documents at issue; DEF has treated and continues to treat the information and documents at issue as confidential. See Affidavit of Borsch, ¶ 8. DEF requests this information be granted confidential treatment by the Commission.

Conclusion

The competitive, confidential information at issue in this Request fits the statutory definition of proprietary confidential business information under Section 366.093, Florida Statutes, and Rule 25-22.006, F.A.C., and therefore 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 Second Request for Confidential Classification 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 Commission;**

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

(3) A justification matrix of the confidential information contained in Appendix A supporting DEF's Request, as Appendix C.

WHEREFORE, DEF respectfully requests that the redacted portions of DEF's response to Calpine's First Set of Interrogatories (Nos. 1-9) and First Request for Production of Documents (No. 1) be classified as confidential for the reasons set forth above.

Respectfully submitted this 7th of July, 2014.

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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 mail and overnight mail this 7th day of July, 2014.

/s/ Blaise N. Gamba

Attorney

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DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation
Alternative to Meet Need Prior to 2018 for Duke Energy Florida, Inc.

Duke Energy Florida, Inc.'s
Second
Request Confidential Classification

EXHIBIT B

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Cost Effective Generation Alternative) DOCKET NO. 140111-EI
to Meet Need Prior to 2018 for Duke) Submitted for filing: June 16, 2014
Energy Florida, Inc.)
_____)

**DUKE ENERGY FLORIDA, INC.'S RESPONSES TO CALPINE CONSTRUCTION
FINANCE COMPANY, L.P.'S FIRST SET OF INTERROGATORIES TO
DUKE ENERGY FLORIDA, INC. (NOS. 1-9)**

Duke Energy Florida, Inc. ("DEF") responds to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories to Duke Energy Florida, Inc. (Nos. 1-9) as follows:

GENERAL OBJECTIONS

DEF incorporates and restates its General Objections to Calpine's First Set of Interrogatories (Nos. 1-9), served on June 4, 2014, as if those objections were fully set forth herein.

INTERROGATORIES

1. Identify each person that prepared or assisted in the preparation of the answers to these interrogatories and state which specific answer(s) each person prepared or assisted in preparing.

RESPONSE:

Benjamin Borsch, Questions 1 – 9.
Liliana Tanaka Ugaz, Questions 3, 5, 6, 7.
Christopher Menendez, Question 7.g.
William Monroig, Question 7.

2. What transmission upgrade costs on the Duke system were assumed by Duke in evaluating Calpine's proposals in response to the RFP?

REDACTED

RESPONSE:

[REDACTED]

- c. Annual unit starts and run time, if used as an input;

RESPONSE:

Annual starts and run times are not used as an input. The output results are reflected in the responses to Question 7 below.

- i. Unit location and status of transmission interconnect evaluation;

REDACTED

RESPONSE:



The treatment of transmission costs in the evaluation is discussed in the response to Question 2 above.

DOCKET 140111-EI

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Request Confidential Classification

Documents responsive to Interrogatory No. 5
bearing Bates Nos.
14LGBRA-CALPINE1-5-DOC1, TAB 5b
is redacted in its entirety

DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation
Alternative to Meet Need Prior to 2018 for Duke Energy Florida, Inc.

Duke Energy Florida, Inc.'s
Second
Request Confidential Classification

Documents responsive to Interrogatory No. 6
bearing Bates Nos.
14LGBRA-CALPINE1-6-DOC1, Tabs 6a, 6d-j, 6e-k, 6g, and 6h
Are redacted in their entirety

DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation
Alternative to Meet Need Prior to 2018 for Duke Energy Florida, Inc.

Duke Energy Florida, Inc.'s
Second
Request Confidential Classification

Documents responsive to Interrogatory No. 7
bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC1, Tab Summary
is redacted in its entirety

DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation
Alternative to Meet Need Prior to 2018 for Duke Energy Florida, Inc.

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Documents responsive to Interrogatory No. 7
bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC1, Tab 7c
is redacted in its entirety

DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation
Alternative to Meet Need Prior to 2018 for Duke Energy Florida, Inc.

Duke Energy Florida, Inc.'s
Second
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Documents responsive to Interrogatory No. 7
bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC2, Tab Summary
is redacted in its entirety

DOCKET 140111-EI

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Alternative to Meet Need Prior to 2018 for Duke Energy Florida, Inc.

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Second
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Documents responsive to Interrogatory No. 7
bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC2, Tab 7c
is redacted in its entirety

Duke Start Cost by Year

REDACTED

Station of Orders

Table with columns for years 2013-2024 and rows for various stations including AC, Andale 1, Andale 2, Andale 3, Andale 4, Andale 5, Andale 6, Andale 7, Andale 8, Andale 9, Andale 10, Andale 11, Andale 12, Andale 13, Andale 14, Andale 15, Andale 16, Andale 17, Andale 18, Andale 19, Andale 20, Andale 21, Andale 22, Andale 23, Andale 24, Andale 25, Andale 26, Andale 27, Andale 28, Andale 29, Andale 30, Andale 31, Andale 32, Andale 33, Andale 34, Andale 35, Andale 36, Andale 37, Andale 38, Andale 39, Andale 40, Andale 41, Andale 42, Andale 43, Andale 44, Andale 45, Andale 46, Andale 47, Andale 48, Andale 49, Andale 50, Andale 51, Andale 52, Andale 53, Andale 54, Andale 55, Andale 56, Andale 57, Andale 58, Andale 59, Andale 60, Andale 61, Andale 62, Andale 63, Andale 64, Andale 65, Andale 66, Andale 67, Andale 68, Andale 69, Andale 70, Andale 71, Andale 72, Andale 73, Andale 74, Andale 75, Andale 76, Andale 77, Andale 78, Andale 79, Andale 80, Andale 81, Andale 82, Andale 83, Andale 84, Andale 85, Andale 86, Andale 87, Andale 88, Andale 89, Andale 90, Andale 91, Andale 92, Andale 93, Andale 94, Andale 95, Andale 96, Andale 97, Andale 98, Andale 99, Andale 100.

Table with columns for years 2013-2024 and rows for DEBARY 1 through DEBARY 10.

Table with columns for years 2013-2024 and rows for Gen 10MAN CT1 through Gen 10MAN CT10.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.1 through Gen 21 CC 1.10.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.11 through Gen 21 CC 1.20.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.21 through Gen 21 CC 1.30.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.31 through Gen 21 CC 1.40.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.41 through Gen 21 CC 1.50.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.51 through Gen 21 CC 1.60.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.61 through Gen 21 CC 1.70.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.71 through Gen 21 CC 1.80.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.81 through Gen 21 CC 1.90.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.91 through Gen 21 CC 1.100.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.101 through Gen 21 CC 1.200.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.201 through Gen 21 CC 1.300.

Table with columns for years 2013-2024 and rows for Gen 21 CC 1.301 through Gen 21 CC 1.400.

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14LGBRA-CALPINE1-7-DOC4, Tab Summary
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Duke Energy Florida, Inc.'s
Second
Request for Confidential Classification

Documents responsive to Calpine Construction Finance Company, L.P.'s
First Request for Production of Documents No. 1
are duplicative of DEF's attachments responsive to
Interrogatories Nos. 5, 6 and 7

DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation
Alternative to Meet Need Prior to 2018 for Duke Energy Florida, Inc.

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interrogatories and state which specific answer(s) each person prepared or assisted in
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Liliana Tanaka Ugaz, Questions 3, 5, 6, 7.
Christopher Menendez, Question 7.g.
William Monroig, Question 7.

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RESPONSE:

[REDACTED]

[REDACTED]

[REDACTED]

- c. Annual unit starts and run time, if used as an input;

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- i. Unit location and status of transmission interconnect evaluation;

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RESPONSE:



The treatment of transmission costs in the evaluation is discussed in the response to Question 2 above.

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Documents responsive to Interrogatory No. 5
bearing Bates Nos.
14LGBRA-CALPINE1-5-DOC1, TAB 5b
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Duke Energy Florida, Inc.'s
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Documents responsive to Interrogatory No. 6
bearing Bates Nos.
14LGBRA-CALPINE1-6-DOC1, Tabs 6a, 6d-j, 6e-k, 6g, and 6h
Are redacted in their entirety

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bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC1, Tab Summary
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Documents responsive to Interrogatory No. 7
bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC2, Tab 7c
is redacted in its entirety

Duke Start Cost by Year

REDACTED

Table with columns for Station (e.g., AC, Andrew 1, Andrew 2, etc.) and rows for years from 2013 to 2043. The table contains numerical data representing start costs for various stations and years.

DOCKET 140111-EI

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14LGBRA-CALPINE1-7-DOC3, Tab Summary
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In re: Petition for Determination of Cost Effective Generation
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Duke Energy Florida, Inc.'s
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14LGBRA-CALPINE1-7-DOC4, Tab Summary
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In re: Petition for Determination of Cost Effective Generation
Alternative to Meet Need Prior to 2018 for Duke Energy Florida, Inc.

Duke Energy Florida, Inc.'s
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Request Confidential Classification

Documents responsive to Interrogatory No. 7
bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC5, Tab Summary
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Duke Energy Florida, Inc.'s
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Documents responsive to Interrogatory No. 7
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First Request for Production of Documents No. 1
are duplicative of DEF's attachments responsive to
Interrogatories Nos. 5, 6 and 7

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
Duke Energy Florida, Inc.'s Responses to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories to Duke Energy Florida, Inc. No. 2	Response in its entirety	<p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
Duke Energy Florida, Inc.'s Responses to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories to Duke Energy Florida, Inc. No. 6.i.	Response, 1 st and 2 nd lines in their entirety, 3 rd line, first word	<p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 5, 14LGBRA-CALPINE1-5-DOC1, Tab 5b	All information on page exclusive of header	<p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question</p>

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		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, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 6, 14LGBRA-CALPINE1-6-DOC1, Tabs 6a, 6d-j, 6e-k, 6g, and 6h	All information on pages	<p>§366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC1, Tab FOM	All information on Lines 34, 49, 50, 51, 119 through 147, and 152 through 154	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual</p>

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
<p>Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC1, Tab VOM Cost</p>	<p>All information on Lines 34, 49 through 51, 119 through 147, and 152 through 154</p>	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
<p>Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7,</p>	<p>All information on page</p>	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which</p>

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
14LGBRA-CALPINE1-7- DOC1, Tab Summary		<p>would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC1, Tab 7c	All information on page	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
<p>Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC 2, Tab FOM</p>	<p>All information on Lines 34, 49 through 51, 119 through 147, 149, and 152 through 154</p>	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
<p>Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC2, Tab VOM Cost</p>	<p>All information on Lines 34, 49 through 51, 119 through 147, 149, and 152 through 154</p>	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question</p>

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

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Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC2, Tab Summary	All information on page	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC2, Tab 7c	All information on page	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which</p>

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

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<p>Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC3, Tab FOM</p>	<p>All information on Lines 33, 44 through 46, 111 through 131, 133, and 136 through 138</p>	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
<p>Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-</p>	<p>All information on Lines 33, 44 through 46, 111 through 131, and 136 through 138</p>	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business</p>

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
DOC3, Tab VOM Cost		<p>operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC3, Tab Start Cost	All information on Lines 33, 44 through 46, 111 through 120, 128 through 131, 133, and 136 through 138	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
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Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC3, Tab 7c	All information on page	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information</p>

**DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
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Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC4, Tab FOM	All information on Lines 34, 49 through 51, 119 through 147, 149, and 152 through 154	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC4, Tab VOM Cost	All information on Lines 34, 49 through 51, 119 through 147, 149, and 152 through 154	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to</p>

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
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Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC4, Tab Summary	All information on page	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC4, Tab 7c	All information on page	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p>

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
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Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC5, Tab FOM	All information on Lines 33, 44 through 46, 111 through 120, 128 through 131, 133, and 136 through 138	<p>366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
Duke Energy Florida, Inc.'s	All information on Lines	366.093(3)(a), Fla. Stat.

DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC5, Tab VOM Cost	33, 44 through 46, 111 through 120, 128 through 131, 133, and 136 through 138	<p>The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§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.</p>
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DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

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Duke Energy Florida, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Request for Production No.1	Documents responsive to this request are duplicative to DEF Response to Interrogatories Nos. 5, 6 and 7	<p>§366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair DEF's efforts</p>

**DUKE ENERGY FLORIDA
DOCKET NO. 140111-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
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