

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 18, 2014

REDACTED

RECEIVED-FPSC
14 JUL 18 AM 11:08
COMMISSION CLERK

DUKE ENERGY FLORIDA, INC.'S FOURTH REQUEST FOR CONFIDENTIAL CLASSIFICATION REGARDING PORTIONS OF CORRECTED 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 Corrected 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 corrected 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 corrected responses to

Calpine's discovery requests, DEF filed its Notice of Intent to Request Confidential Classification on June 27, 2014 (Document No. 03335-14). 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.

- CCM _____
- 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 corrected 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 Fourth 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 corrected 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 18th of July, 2014.

John T. Burnett
Deputy General Counsel
Dianne M. Triplett
Associate General Counsel
DUKE ENERGY FLORIDA, INC.
Post Office Box 14042
St. Petersburg, FL 33733-4042
Telephone: (727) 820-5587
Facsimile: (727) 820-5519

/s/ Blaise N. Gamba
James Michael Walls
Florida Bar No. 0706242
Blaise N. Gamba
Florida Bar No. 0027942
CARLTON FIELDS JORDEN BURT, P.A.
Post Office Box 3239
Tampa, FL 33601-3239
Telephone: (813) 223-7000
Facsimile: (813) 229-4133

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 18th day of July, 2014.

/s/ Blaise N. Gamba

Attorney

Michael Lawson
Florida Public Service Commission Staff
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Phone: (850) 413-6199
Facsimile: (850) 413-6184
Email: mlawson@psc.state.fl.us

Charles Rehwinkel
Deputy Public Counsel
Erik Saylor
Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Phone: (850) 488-9330
Email: rehwinkel.charles@leg.state.fl.us
Saylor.erik@leg.state.fl.us

Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm
118 North Gadsden Street
Tallahassee, FL 32301
Phone: (850) 681-3828
Fax: (850) 681-8788
Email: jmoyle@moylelaw.com
kputnal@moylelaw.com

James W. Brew
F. Alvin Taylor
Brickfield Burchette Ritts & Stone, PC
1025 Thomas Jefferson St NW
8th FL West Tower
Washington, DC 20007-5201
Phone: (202) 342-0800
Fax: (202) 342-0807
Email: jbrew@bbrslaw.com
ataylor@bbrslaw.com

Robert Scheffel Wright
John T. LaVia, III
Gardner Law Firm
1300 Thomaswood Drive
Tallahassee, FL 32308
Phone: (850) 385-0070
Email: Schef@gbwlegal.com
Jlavia@gbwlegal.com

Marsha E. Rule
Rutledge Ecenia
119 South Monroe Street, Ste. 202
Tallahassee, FL 32301
Phone: (850) 681-6788
Fax: (850) 681-6515
Email: marsha@rutledge-ecenia.com

Gordon D. Polozola
NRG Energy, Inc.
112 Telly Street
New Roads, LA 70760
Phone: (225) 618-4084
Email: Gordon.Polozola@nrgenergy.com

Richard A. Zambo
Richard A. Zambo, P.A.
2336 S.E. Ocean Boulevard, #309
Stuart, FL 34966
Phone: (772) 225-5400
Email: richzambo@aol.com

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
Fourth
Request for Confidential Classification

EXHIBIT B

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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 5
Bearing Bates Nos.
14LGBRA-CALPINE1-5-DOC1 CORRECTED, 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 6
Bearing Bates Nos.
14LGBRA-CALPINE1-6-DOC1 CORRECTED,
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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC1 CORRECTED,
Tab Summary
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC1 CORRECTED,
Tab 7c
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC2 CORRECTED,
Tab Summary
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC2 CORRECTED,
Tab 7c
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC3 CORRECTED,
Tab Summary
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC3 CORRECTED,
Tab 7c
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC4 CORRECTED,
Tab Summary
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC4 CORRECTED,
Tab 7c
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC5 CORRECTED,
Tab Summary
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC5 CORRECTED,
Tab 7c
is 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
Fourth
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.

Duke Energy Florida, Inc.'s
Fourth
Request for Confidential Classification

EXHIBIT B

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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 5
Bearing Bates Nos.
14LGBRA-CALPINE1-5-DOC1 CORRECTED, 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 6
Bearing Bates Nos.
14LGBRA-CALPINE1-6-DOC1 CORRECTED,
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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC1 CORRECTED,
Tab Summary
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC1 CORRECTED,
Tab 7c
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC2 CORRECTED,
Tab Summary
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC2 CORRECTED,
Tab 7c
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC3 CORRECTED,
Tab Summary
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC3 CORRECTED,
Tab 7c
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC4 CORRECTED,
Tab Summary
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC4 CORRECTED,
Tab 7c
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC5 CORRECTED,
Tab Summary
is 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
Fourth
Request for Confidential Classification

Documents responsive to Interrogatory No. 7
Bearing Bates Nos.
14LGBRA-CALPINE1-7-DOC5 CORRECTED,
Tab 7c
is 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
Fourth
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

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
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 CORRECTED	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 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. 6, 14LGBRA-CALPINE1-6-DOC1, Tabs 6a, 6d-j, 6e-k, 6g, and 6h CORRECTED	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
DOCKET NO. 140111-EI
Fourth Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
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 CORRECTED	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 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 VOM Cost CORRECTED	All information on Lines 34, 49 through 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 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
Fourth Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		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. 7, 14LGBRA-CALPINE1-7-DOC1, Tab Summary CORRECTED	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-DOC1, Tab 7c CORRECTED	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</p>

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>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-DOC 2, Tab FOM CORRECTED</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>

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
CORRECTED		<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 Summary CORRECTED	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	All information on page	366.093(3)(a), Fla. Stat.

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
<p>Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC2, Tab 7c CORRECTED</p>		<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>
<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 CORRECTED</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</p>

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		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. 7, 14LGBRA-CALPINE1-7-DOC3, Tab VOM Cost CORRECTED	All information on Lines 33, 44 through 46, 111 through 131, 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 Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC3, Tab Start Cost CORRECTED	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</p>

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>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-DOC3, Tab Summary CORRECTED</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 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-DOC3, Tab 7c CORRECTED</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 would impair DEF's business operations.</p>

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<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 FOM CORRECTED	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	All information on Lines 34, 49 through 51, 119	366.093(3)(a), Fla. Stat. The document in question contains

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC4, Tab VOM Cost CORRECTED	through 147, 149, and 152 through 154	<p>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 Summary CORRECTED	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</p>

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		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. 7, 14LGBRA-CALPINE1-7-DOC4, Tab 7c CORRECTED	All information on page	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. §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. §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, Inc.'s Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories No. 7, 14LGBRA-CALPINE1-7-DOC5, Tab FOM CORRECTED	All information on Lines 33, 44 through 46, 111 through 120, 128 through 131, 133, and 136 through 138	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. §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.

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<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-DOC5, Tab VOM Cost CORRECTED</p>	<p>All information on Lines 33, 44 through 46, 111 through 120, 128 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-DOC5, Tab Summary CORRECTED</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 would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat.</p>

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>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-DOC5, Tab 7c CORRECTED</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 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</p>	<p>Documents responsive to this request are duplicative to DEF Response to</p>	<p>§366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential</p>

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

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
Company, L.P.'s First Request for Production No.1 CORRECTED	Interrogatories Nos. 5, 6 and 7	<p>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>