

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 31, 2014

**REDACTED**

**DUKE ENERGY FLORIDA, INC.'S NINTH REQUEST FOR CONFIDENTIAL CLASSIFICATION REGARDING PORTIONS OF SUPPLEMENTAL RESPONSES TO NRG FLORIDA LP'S 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 *supplemental* responses to NRG Florida LP's First Request for Production (Nos. 1-17). Specifically, DEF is seeking confidential classification of its response to NRG Florida LP's First Request for Production of Documents Nos. 1, 6 and 7. Unredacted versions 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 supplemental responses to NRG Florida LP's First Request for Production of Documents, DEF filed its Notice of Intent to Request Confidential Classification on July 11, 2014 (Document No. 03635-14). 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 + Redacted  
GCL 1  
IDM 1  
TEL \_\_\_\_\_  
CLK \_\_\_\_\_

RECEIVED-FPSC  
14 JUL 31 AM 11:34  
COMMISSION  
CLERK

## 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 supplemental information to NRG Florida LP’s First Request for Production of Documents Nos. 1, 6 and 7, specifically as noted above and in the supporting Affidavit of Benjamin M.H. Borsch ¶ 3-4, because the responses contain proprietary and confidential competitive business information and contractual data and competitively sensitive commercial information and potential supplier data, the disclosure of which would adversely impact DEF’s competitive business interests. 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 these proposals and contracts between DEF and these vendors, 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 Ninth 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 supplemental response to NRG Florida LP's First Request for Production of Documents Nos. 1, 6 and 7 be classified as confidential for the reasons set forth above.

Respectfully submitted this 31<sup>th</sup> day 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 and overnight mail this 31<sup>th</sup> 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](mailto: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](mailto:rehwinkel.charles@leg.state.fl.us)  
[Saylor.erik@leg.state.fl.us](mailto: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](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto: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](mailto:jbrew@bbrslaw.com)  
[ataylor@bbrslaw.com](mailto: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](mailto:Schef@gbwlegal.com)  
[Jlavia@gbwlegal.com](mailto: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](mailto: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](mailto: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](mailto: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  
Ninth  
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  
Ninth  
Request for Confidential Classification

Document bearing Bates Numbers  
14LGBRA-NRGPOD1-1-000056  
through  
14LGBRA-NRGPOD1-1-000086  
are confidential in their entirety

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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  
Ninth  
Request for Confidential Classification

Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-6-DOC 1  
is confidential in its entirety



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In re: Petition for Determination of Cost Effective Generation  
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Duke Energy Florida, Inc.'s  
Ninth  
Request for Confidential Classification

Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 1  
All information on Tabs titled Capital Cost,  
Fixed Costs, Non-Fuel, Variable Cost,  
Alternative Fuel Delivery Cost, and Alternative  
Heat Rate

DOCKET 140111-EI

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

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

Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 2  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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

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

Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 3  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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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  
Ninth  
Request for Confidential Classification

Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 4  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety



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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 5  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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Ninth  
Request for Confidential Classification

Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 6  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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

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Ninth  
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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 7  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 8  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety



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Duke Energy Florida, Inc.'s  
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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 9  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 10  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 11  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 12  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety



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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 13  
All information on Tabs titled  
Reagent Cost, Fuel Cost, Total Cost, FOM,  
VOM Cost, NOx, NOx Cost, MWH, S02, S02  
Cost, CO2, CO2 Cost, Hg, Btu, Starts, and  
Start Cost  
in their entirety

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

Duke Energy Florida, Inc.'s  
Ninth  
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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 14  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 15  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 16  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 17  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 18  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety



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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 19  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 20

All information on Tabs titled  
Reagent Cost, Fuel Cost, TotCost, FOM, VOM  
Cost, NOx, NOx Cost, MWH, S02, S02 Cost,  
CO2, CO2 Cost, Hg, Btu, Starts, and Start Cost  
in their entirety

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 21  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 22  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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

Duke Energy Florida, Inc.'s  
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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 23  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety

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

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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 24  
All information on Tabs titled  
FOM, VOM Cost, and Start Cost  
in their entirety



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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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Spreadsheet bearing Bates Numbers  
14LGBRA-NRGPOD1-7-DOC 25  
All information on Tabs titled  
Fuel Forecast HighGas, and Fuel Forecast  
in their entirety

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

<b>DOCUMENT</b>	<b>PAGE/LINE/ COLUMN</b>	<b>JUSTIFICATION</b>
Duke Energy Florida, Inc.'s Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 1, Bates No. 14LGBRA-NRGPOD1-1-000056 through 14LGBRA-NRGPOD1-1-000086	Entire Document	<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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-6-DOC 1	Entire Spreadsheet (all tabs)	<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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 1	All information on spreadsheets titled on Tabs Capital Cost, Fixed Costs, Non-Fuel Variable Cost, Alternative Fuel Delivery Cost, and Alternative Heat Rate in their entirety	<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>

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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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 2</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</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 Supplemental Responses to NRG Florida LP's First</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and</p>	<p>366.093(3)(a), Fla. Stat.  The document in question contains proprietary confidential</p>



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**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 3	Start Cost in their entirety	<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 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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 4	All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety	<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</p>

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**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		business of the provider/owner of the information.
Duke Energy Florida, Inc.'s Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 5	All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety	<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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 6	All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety	<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>

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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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 7</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 8</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</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</p>



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		<p>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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 9</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</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 Supplemental Responses to NRG Florida LP's First Request for Production of</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</p>	<p>366.093(3)(a), Fla. Stat.  The document in question contains proprietary confidential information relating to trade</p>

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Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 10		<p>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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 11	All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety	<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</p>

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		the information.
<p>Duke Energy Florida, Inc.'s Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 12</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 13</p>	<p>All information on spreadsheets titled on Tabs Reagent Cost, Fuel Cost, Total Cost, FOM, VOM Cost, NOx, NOx Cost, MWH, SO2, SO2 Cost, CO2, CO2 Cost, Hg, Btu, Starts, and Start Cost in their entirety</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.</p>



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		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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 14	All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety	<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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 15	All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety	<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>

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		<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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 16</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No.</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</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>

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14LGBRA-NRGPOD1-7- DOC 17		<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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7- DOC 18	All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety	<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>



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<p>Duke Energy Florida, Inc.'s Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 19</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 20</p>	<p>All information on spreadsheets titled on Tabs Reagent Cost, Fuel Cost, TotCost, FOM, VOM Cost, NOx, NOx Cost, MWH, SO2, SO2 Cost, CO2, CO2 Cost, Hg, Btu, Starts and Start Cost in their entirety</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>

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		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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 21	All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety	<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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 22	All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety	<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>

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		<p>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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 23</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-</p>	<p>All information on spreadsheets titled on Tabs FOM, VOM Cost, and Start Cost in their entirety</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>



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DOC 24		<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 Supplemental Responses to NRG Florida LP's First Request for Production of Documents No. 6, Bates No. 14LGBRA-NRGPOD1-7-DOC 25	All information on spreadsheets titled on Tabs Fuel Forecast HighGas, and Fuel Forecast in their entirety	<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>