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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Need for Citrus County Combined)
Cycle Power Plant, by Duke Energy)
Florida, Inc.

DOCKET NO. 140110-EI
FILED: August 11, 2014

REDACTED

CALPINE CONSTRUCTION FINANCE COMPANY, L.P.'S SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION

Calpine Construction Finance Company, L.P. ("Calpine"), by and through undersigned counsel and, pursuant to Rule 25-22.006, Florida Administrative Code ("F.A.C."), and Section 366.093, Florida Statutes ("F.S."), hereby requests COMPAND CONTROL CO

1. On July 21, 2014, Calpine filed its Second Notice of Intent to Request Confidential Classification ("Second Notice of Intent") related to certain workpapers and calculations of Calpine's witness Paul Hibbard produced in response to Duke Energy Florida, Inc.'s ("DEF's") First Request for Production of Documents (Nos. 1-5) ("DEF's Request to Produce").

Specifically, the following documents produced in response to DEF's Request to Produce were identified in the Second Notice of Intent: Bates Numbered Pages 1400110-140111.DEF1.DOC100005

- DOC100031; 1400110-140111.DEF1.DOC100033 DOC100037;

 1400110-140111.DEF1.DOC100039 DOC100042; 1400110
 140111.DEF1.DOC100046 DOC100055; 1400110
 140111.DEF1.DOC100057-1400110-140111.DEF1.DOC100058

 (collectively referred to as the "Confidential Discovery Responses"). Accordingly, pursuant to Rule 25-22.006(3),

 F.A.C., this request is timely.
- 2. The following exhibits are included and made a part of this request:
 - a. Exhibit A includes a copy of the Confidential

 Discovery Responses, on which all information

 that is entitled to confidential treatment under

 Florida law has been highlighted. Exhibit A is

 submitted separately in a sealed folder marked

 "CONFIDENTIAL."
 - b. All information for which confidential treatment is sought has been redacted in Exhibit B, which is an edited and publicly available version of the Confidential Discovery Responses.
 - c. Exhibit C is a table containing the specific

 line and page reference of the selected items or
 sections of the Confidential Discovery Responses
 for which confidential treatment is sought and,
 with regard to each document or discrete

- subsections thereof, references to the specific statutory basis or bases for the claim of confidentiality.
- d. Exhibit D is the affidavit of Todd Thornton, Senior Vice President of Calpine Corporation.
- Section 366.093(1), F.S., provides that "any records 3. received by the Commission which are shown to be proprietary confidential business information shall be kept confidential and shall be exempt from s. 119.07(1)." Section 366.093(3), F.S., defines proprietary confidential business information to mean 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) to the company's business operation, and (iv) the information has not been voluntary disclosed to the public. Section 366.093(3)(d), F.S., further defines proprietary confidential business information as "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." Additionally, section 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.

- 4. Calpine is requesting confidential classification of the Confidential Discovery Responses because the Confidential Discovery Responses contain proprietary and confidential competitive business information, including information concerning contractual data and competitively sensitive commercial information and bidding data, the disclosure of which would harm or otherwise adversely impact Calpine's competitive business interests. Calpine has treated the Confidential Discovery Responses as confidential and Calpine has not voluntarily disclosed the Confidential Discovery Responses to the public.
- 5. Upon a finding by the Commission that the material in Exhibit A for which Calpine seeks confidential treatment is proprietary confidential business information within the meaning of Section 366.093(3), F.S., such information should not be declassified for a period of at least eighteen (18) months. Additionally, the material provided should be returned to Calpine as soon as the information is no longer necessary for the Commission to conduct its business, pursuant to Section 366.093(4), F.S.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavit included herewith, Calpine Construction Finance Company, L.P.

respectfully requests that its Second Request for Confidential Classification be granted.

Respectfully submitted this 11th day of August, 2014.

L.P.

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(850) 385-5416 Facsimile

Attorneys for Calpine
Construction Finance Company,

(850) 385-0070 Telephone

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following, by electronic delivery, on this $\underline{11th}$ day of August, 2014.

Curt Kiser Michael Lawson Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

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Attorney

Calpine Construction Finance Company, L.P.

In re: Petition for Determination of Need For Citrus County Combined Cycle Power Plant, by Duke Energy Florida, Inc.

Docket No. 140110-EI

Second Request for Confidential Classification

Exhibit A

CONFIDENTIAL

DOCKET 140110-EI

IN RE: PETITION FOR DETERMINATION OF NEED OF CITRUS COUNTY COMBINED CYCLE POWER PLANT, BY DUKE ENERGY FLORIDA, INC.

CALPINE'S SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT A

Calpine Construction Finance Company, L.P.

In re: Petition for Determination of Need For Citrus County Combined Cycle Power Plant, by Duke Energy Florida, Inc.

Docket No. 140110-EI

Second Request for Confidential Classification

Exhibit B

| luke | Gener | etion | hu | Vanr |
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COMPETITIVELY SENSITIVE CONFIDENTIAL INFORMATION

Thousands of MWh [1] 14LGBRA-CALPINE1-7-DOC 4 CONFIDENTIAL Docket_140111-EJ-Q7- Self-Build P5.xlsx Duke VOM Cost by Year COMPETITIVELY SENSITIVE CONFIDENTIAL INFORMATION Thousands of Dollars Source:
[1] 14LGBRA-CALPINE1-7-DOC 4 CONFIDENTIAL Docket_140111-EI-Q7- Self Build P5.xisx Duke Starts by Year COMPETITIVELY SENSITIVE CONFIDENTIAL INFORMATION Number of Starts **Duke Start Cost by Year**

COMPETITIVELY SENSITIVE CONFIDENTIAL INFORMATION

Thousands of Dollars

Source:
[1] 14LGBRA-CALPINE1-7-DOC 4 CONFIDENTIAL Docket_140111-EI-Q7- Self Build P5.xlsx

Competitively Sensitive Confidential Information Number of Starts

| (2013) |
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Source:

[1] SNL Financial, data year 2013.

Competitively Sensitive Confidential Information Suwannee River CT Unit Hourly Operations Values

Period : CUSTOM

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Date Range: 1/1/2013 to 12/31/2013



Competitively Sensitive Confidential Information
Suwannee River CT

Suwannee River CT Unit Hourly Operations Values

Date Range : 1/1/2013 to 12/31/2013 Period : CUSTOM REDACTED IN ITS ENTIRETY



Competitively Sensitive Confidential Information
Osprey Energy Center
Unit Hourly Operations Values

Period : CUSTOM

REDACTED IN ITS ENTIRETY

Date Range : 1/1/2013 to 12/31/2013



Competitively Sensitive Confidential Information Osprey Energy Center Unit Hourly Operations Values

Date Range : 1/1/2013 to 12/31/2013 Period : CUSTOM REDACTED IN ITS ENTIRETY



Calpine LCOE Model Sources and Assumptions Exhibit PJH-2

| Environmental Costs | NOx Emissions Intensity (the / AD/Ben) | CO2 Emissions Intensity (lbs / MMBeu) | Gas Transportation Costs (\$/ MMB(ts)) | Natural Gas Price (\$AMBen) | Number of Starts | Start Cost (Sistart) | Variable O&M Costs (5) | Fixed O&M Costs (5) | Transmission Capital Costs | MACRS Schedule | Financial Assumptions | | Heat Rate | Capital Costs' Capacity Price (\$2016) | Capacity Factor | Capacity | Timing | Variable |
|--|---|---------------------------------------|--|-----------------------------------|------------------|---|--|--|---|--|---|---------------------------------|--|--|---|---|---|------------|
| All | Orprey Survannee Hines Chillers | AII | Ospiney | All | Otprey | Озряеу | Osprey PPA Osprey Sale, Servanne Hines Chilbers | Osprey (Sale only) Suwramee Hines Chillers | Ogmey | Osprey Swerzmore Hines Chillers | Return on Equity Return on Debt WACC Tax rate | Suwannee Hines Chillers | Озряку | Osprey Survanzee Bines Chillers | Osprey Suvrannee Hines Chillers | Ospary Surramene Hines Chillen | Osprey Surrannee Hines Chillers | Unit(0) |
| Forcasted 2015 - 2043 | 0 0115 be/MMBm 0 0106 be/MMBm 0 0100 be/MMBm | 117 08 Ibs/ADABha | \$0.55 per MABra | Forcasted 2015 - 2043 | | Foreasted 2015 - 2043 | From Bid, escalated Forcasted 2015 - 2043 Forcasted 2015 - 2043 | Foreasted 2015 - 2043 | \$150 Million | 20 year from IRS 15 year from IRS 20 year from IRS | 10.5% 3.75% 6.46% 35.26% | 10,197 Btu/kWh 7,222 Btu/kWh | | \$175 Million (\$2020, Sale) \$197 Million \$160 Million | 9 3% | AM 591 AM 910 AM 515 | 2015 - 2015 (FFA) 2025 - 2043 (Sale) Built 2016, 2043 End Date Built 2017, 2043 End Date | Assumption |
| Strategist Input, Response to IR4 and IR11 | SML DEF Response to NRG, No. 27 Strategist Imput, Response to IR10, Hines 2 | Strategist Input, Response to IR10 | Calpine Bid | Strategist Input, Response to IRS | | Calprine Bid Strategist Output, IR.7 | Calpine Bid Strategist Input, Response to IR6 Strategist Output, IR7 | Strategist Input, Response to IR6 | Scott Direct Technoory, Docket No 140111-E1 | IRS - Publication 946 | BMHB-1, p 48 | BMHB-2 SNL Financial | Calpine Bids (PPA) Thornton Direct Testimony, Docket No 140111-EI (Sale) | Calpine Bid Bornel Direct Testimony, Docket No 140111-E1 | BMHB-2 and Berrich Direct Testimony, Docket No 140111-EI BMHB-2 | Calpine Bid BMHB-2 (Summer Capacity) Strategist Input (Kesponce to IRS) | Calgine Bid Duke Proposal | Source |

- Ell Response to Question 4, Schedule from DEF's Response to Calpine's 1st Interrogatories, Docket No. 140111, June 20, 2014, 14LGBRA-CALPRE1-5-DOC 1 CONFIDENTIAL Docket_140111-EL Q5 (2) xkx

 El Response to Question 5, Corrected Schedule from DEF's Response to Calpine's 1st Interrogatories, Docket No. 140111, June 20, 2014, 14LGBRA-CALPRE1-5-DOC 1 CONFIDENTIAL Docket_140111-EL Q5 (2) xkx

 El Response to Question 7, Corrected Schedule from DEF's Response to Calpine's 1st Interrogatories, Docket No. 140111, June 20, 2014, 14LGBRA-CALPRE1-5-DOC 1 CONFIDENTIAL Docket_140111-EL Q5 (2) xkx

 El Response to Question 7, Corrected Schedule from DEF's Response to Calpine's 1st Interrogatories, Docket No. 140111, June 20, 2014, 14LGBRA-CALPRE1-7-DOC 4 CONFIDENTIAL Docket_140111-EL Q7- Self Build P5 xlxx

 El Response to Question 10, Schedule from DEF's Response to Calpine's 2nd Interrogatories, Docket No. 140111, June 24, 2014, 14LGBRA-CALPRE2-7-DOC 4 CONFIDENTIAL Docket_140111-EL Q7- Self Build P5 xlxx

 El Response to Question 10, Schedule from DEF's Response to Calpine's 2nd Interrogatories, Docket No. 140111, June 24, 2014, 14LGBRA-CALPRE2-Q10-000001-000004 Emaistion Rater_2013_9927 xlxx

 El Response to Question 11, Schedule from DEF's Response to Calpine's 2nd Interrogatories, Docket No. 140111, June 24, 2014, 14LGBRA-CALPRE2-Q10-000001-000004 Emaistion Rater_2013_9927 xlxx

 El Response to Question 10, Schedule from DEF's Response to Calpine's 2nd Interrogatories, Docket No. 140111, June 24, 2014, 14LGBRA-CALPRE2-Q10-000001-000004 Emaistion Rater_2013_9927 xlxx

 El Response to Question 10, Schedule from DEF's Response to Calpine's 2nd Interrogatories, Docket No. 140111, June 24, 2014, 14LGBRA-CALPRE2-Q10-000001-000004 Emaistion Rater_2013_9927 xlxx

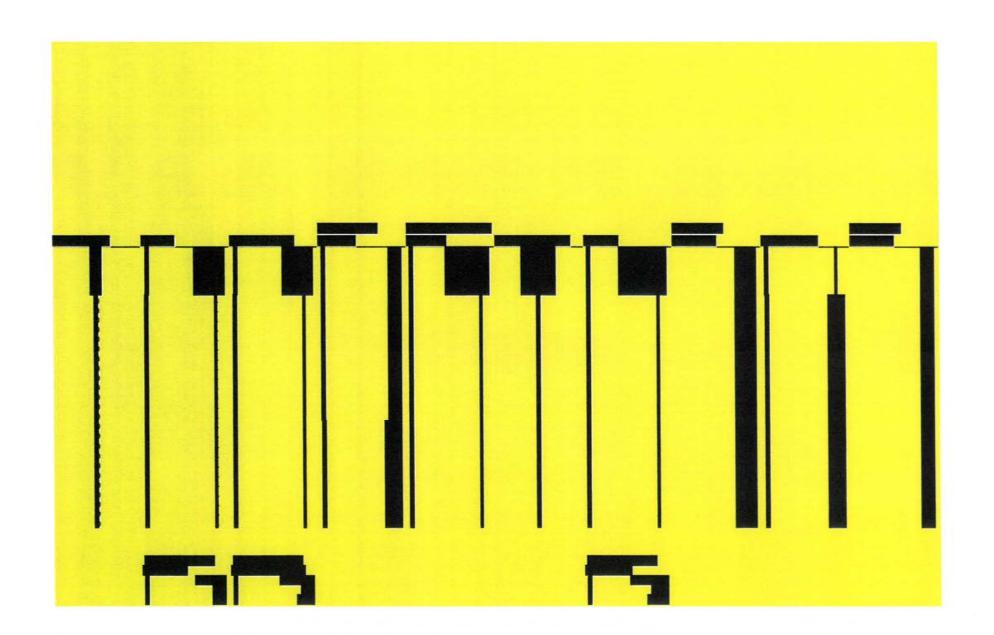
 El Response to Question 10, Schedule from DEF's Response to Calpine's 2nd Interrogatories, Docket No. 140111, June 24, 2014, 14LGBRA-CALPRE2-Q10-000001-000004 Emaistion Rater_2013_9927 xlxx

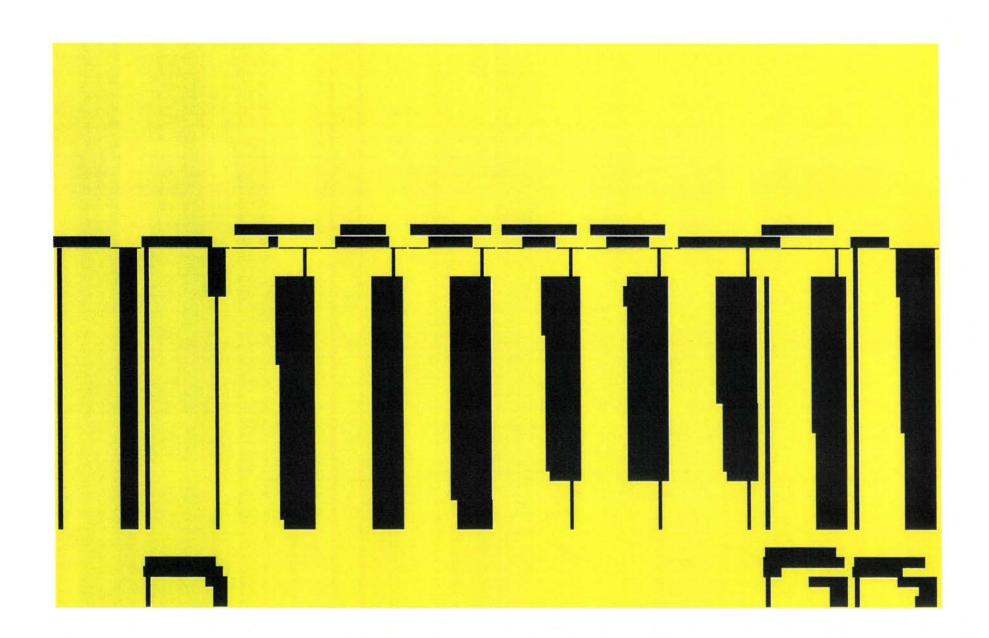
 El Response to Question 10, Schedule from DEF's Response to Calpine's 2nd Interrogato
- [8] Direct Tentimony of Edward Scott, on Behalf of Duke Energy Florida, Inc., In re: Perition for Determination of Cost Effective Generation Alternative to Meet Need Prior to 2018 Florida Public Service Commission Docket No. 140111-E1, May 27, 2014, Exhibit ES-3
 [9] N.H. Franccial
 [10] Duke Energy Florida, Inc.'s responses to NRG Florida LP's First Interrogatories Nos. 1-108 to Duke Energy Florida, Inc., No. 27

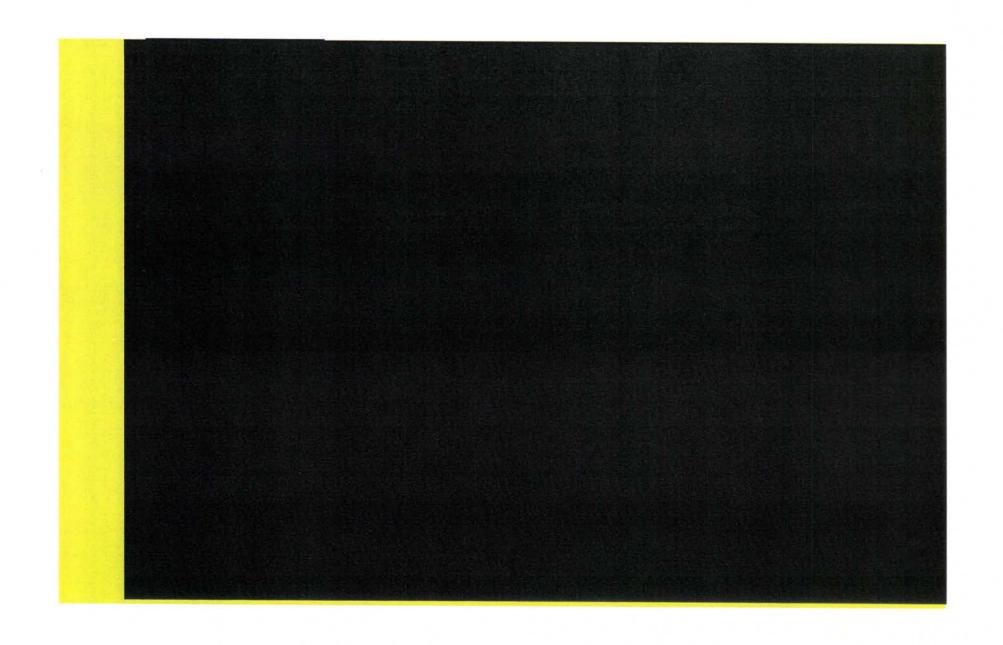
COMPETITIVELY SENSITIVE CONFIDENTIAL INFORMATION

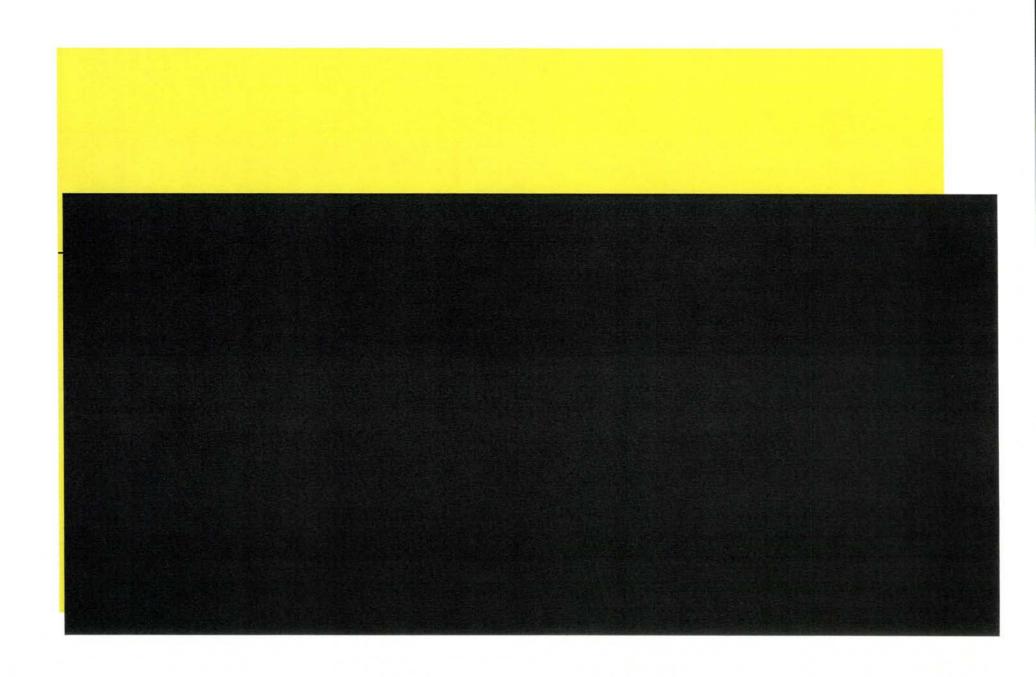
| Levelized Cost | | 014), Florida Ratepaye ons and Bid Values | r Perspective | |
|---|-------------------------|---|-------------------------------------|---------------------|
| Discount Rate Inflation Rate CO2 Allowance Inflation Rate | 6.46% 2.50% 6.30% | Debt/Equity Ratio Return on Equity Return on Debt Effective Tax Rate | 50.00% 10.50% 3.75% 35.26% | |
| Model Name | Duke Suwannee | Duke Hines Chiller | Calpine Osprey PPA | Calpine Osprey Sale |
| Strategist Scenario | selfp5 | selfp5 | ppa1p5 | aq2p5 |
| Strategist Unit | Gen_CT_1.2 | Hines_2-4 | ppa_1 | aq_2 |
| Docket | LGBRA | LGBRA | LGBRA | LGBRA |
| Capacity (MW) | 316 | 165 | 515 | 515 |
| Heat Rate (BTU/kWh) | 10,197 | 7,222 | | |
| Gas Transportation Costs (\$/MMBtu) | \$0.00 | \$0.00 | \$0.55 | \$0.55 |
| Installed Cost | \$196,900,000 | \$160,000,000 | \$0 | WHITE STATE |
| CO2 Emissions Intensity (lbs/MMBtu) | 117.08 | 117.08 | 117.08 | 117.08 |
| NOx Emissions Intensity (lbs/MMBtu) | 0.0106 | 0.0100 | 0.0113 | 0.0113 |

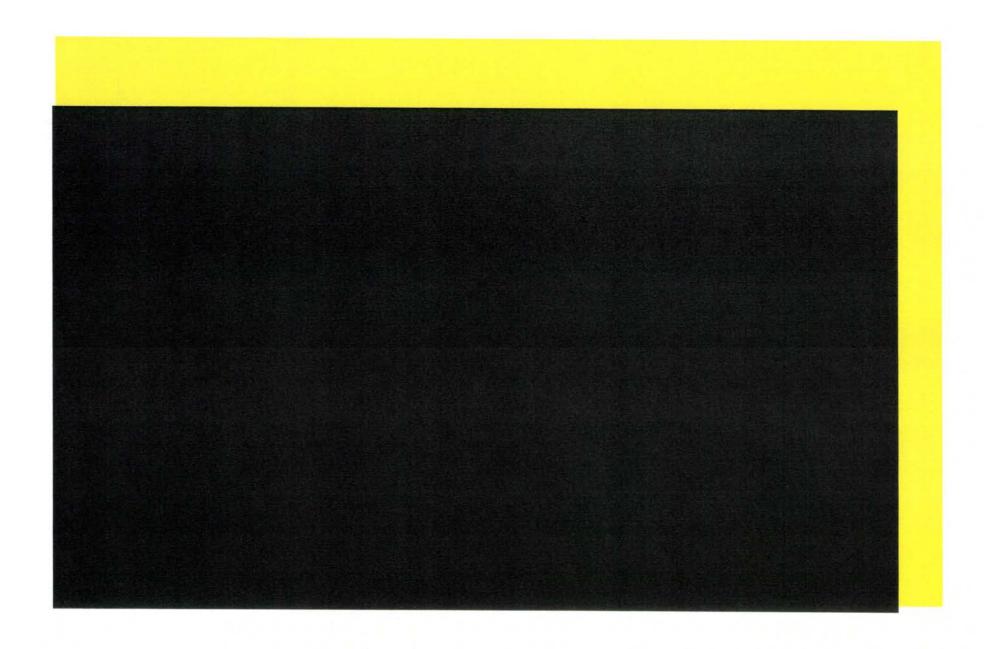


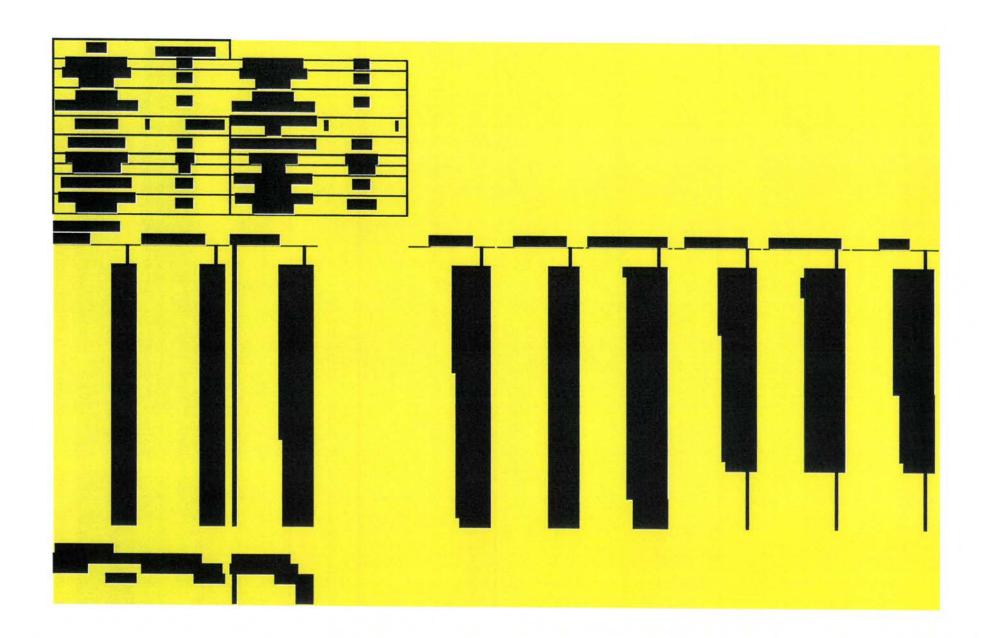


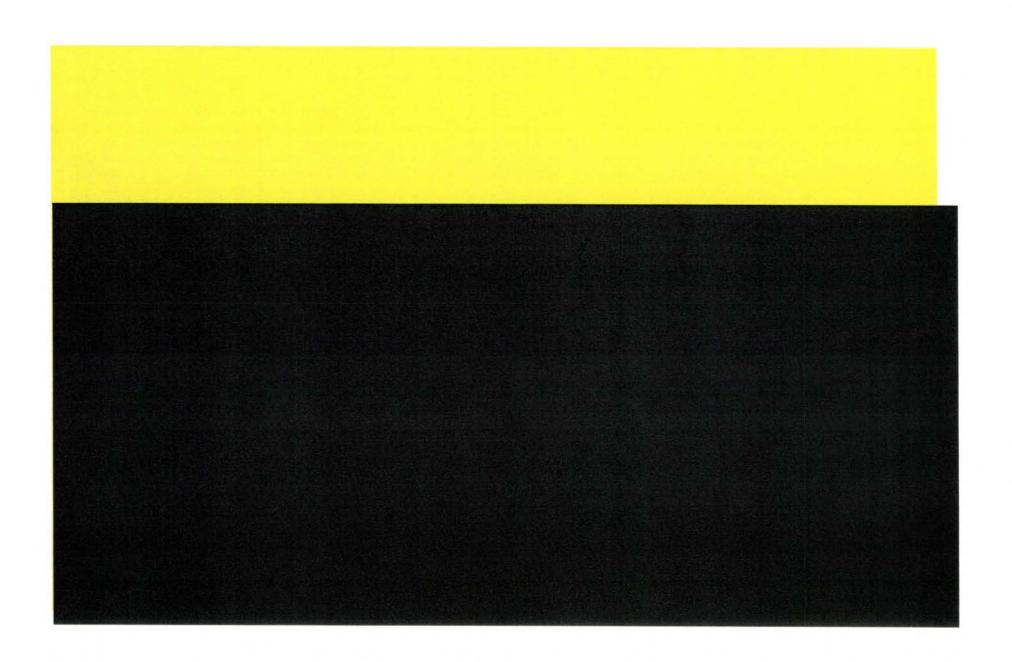


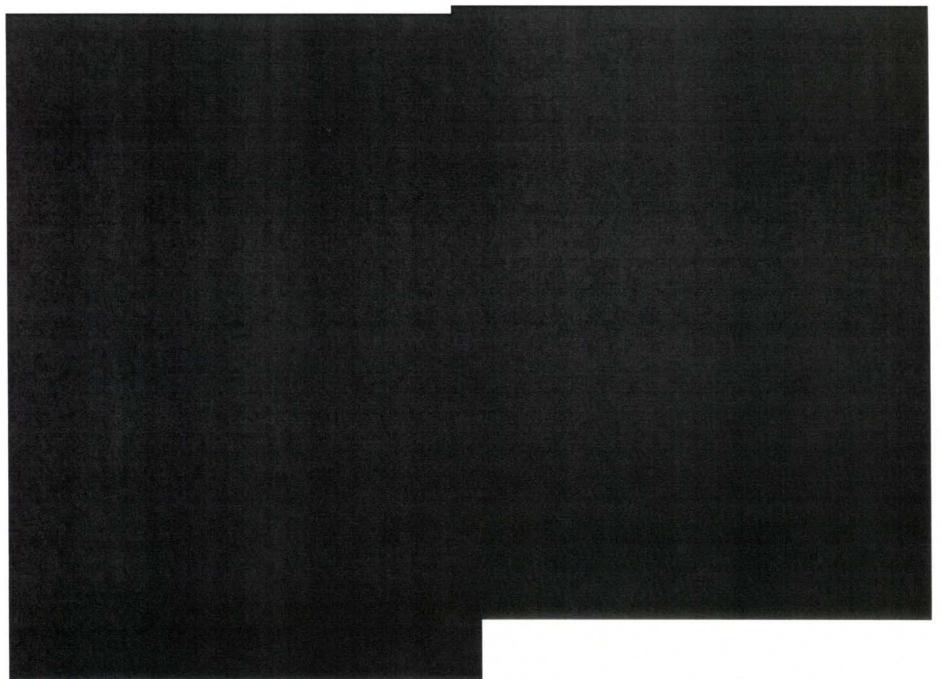


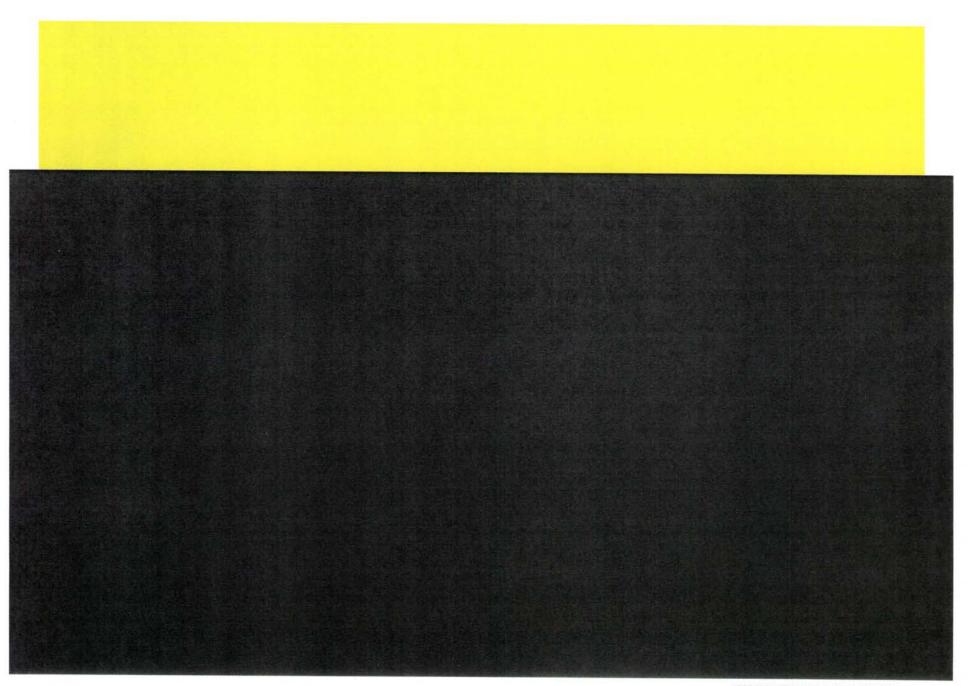




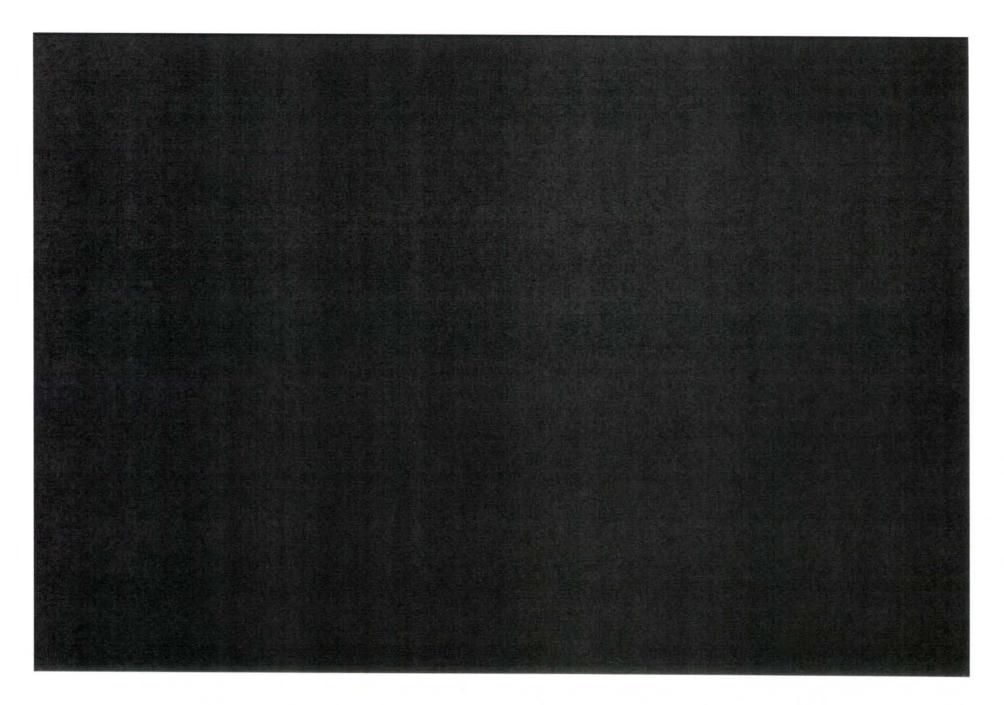


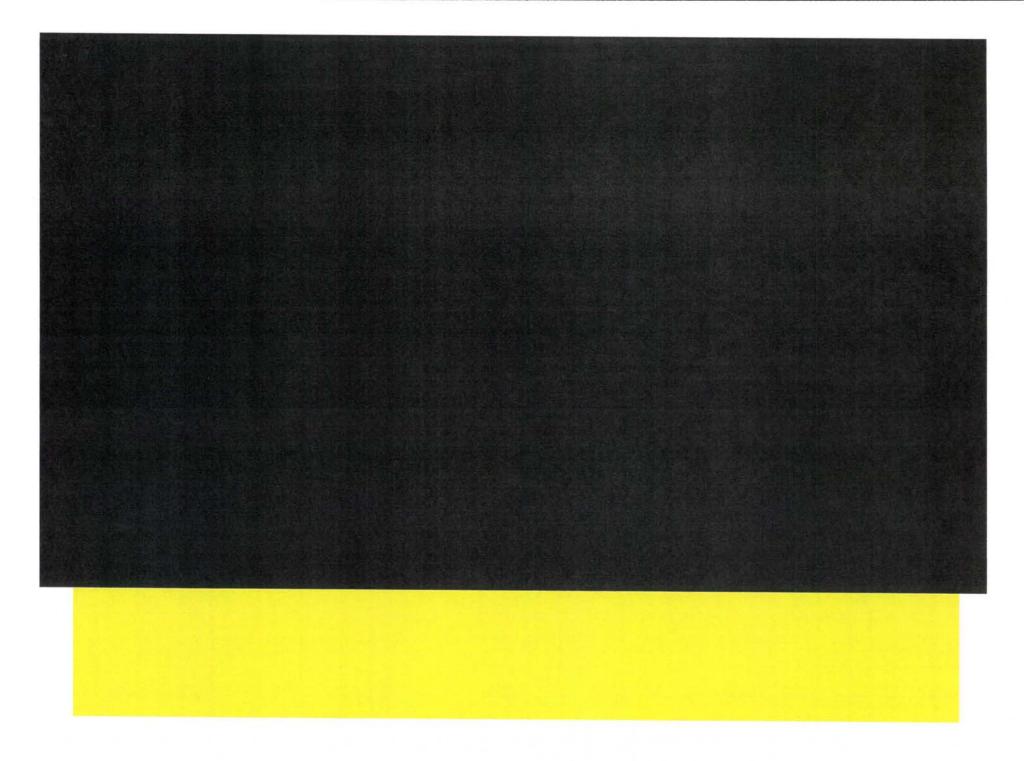


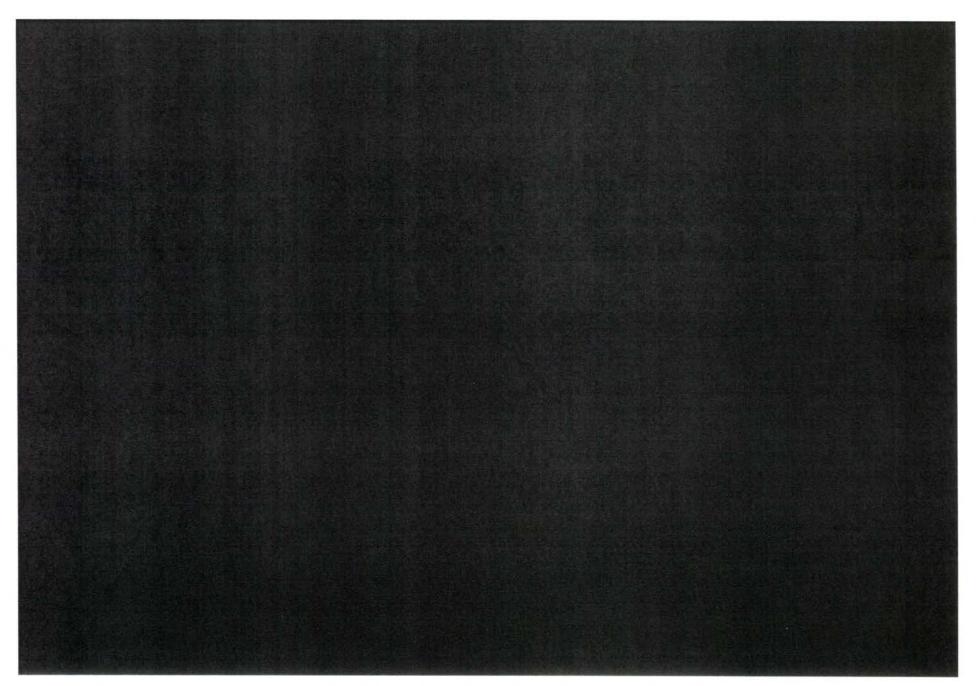




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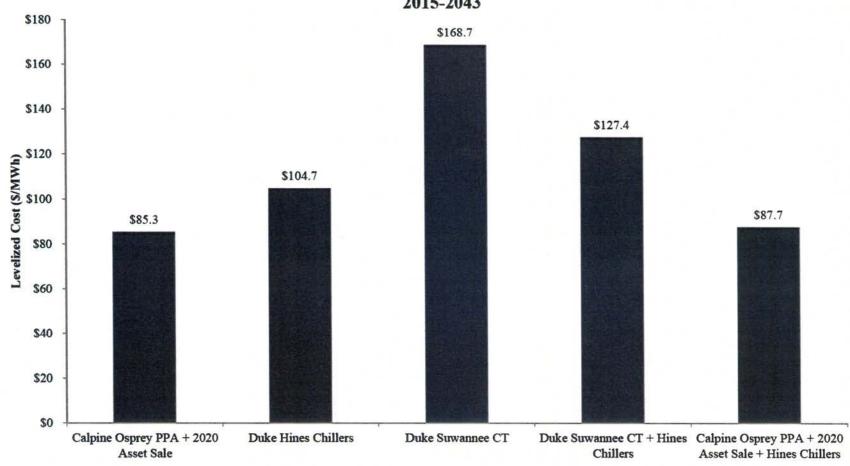


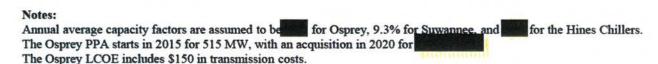




Competitively Sensitive Confidential Information

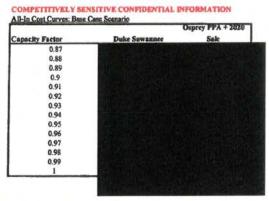




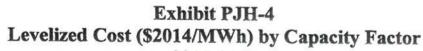


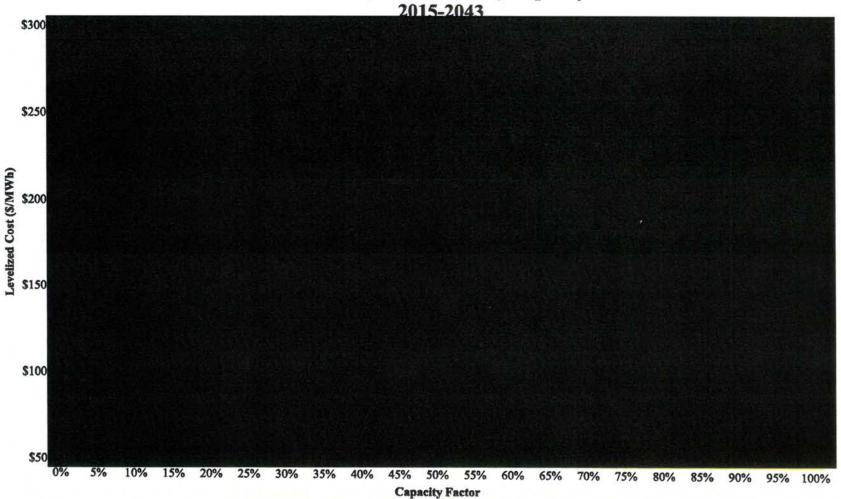
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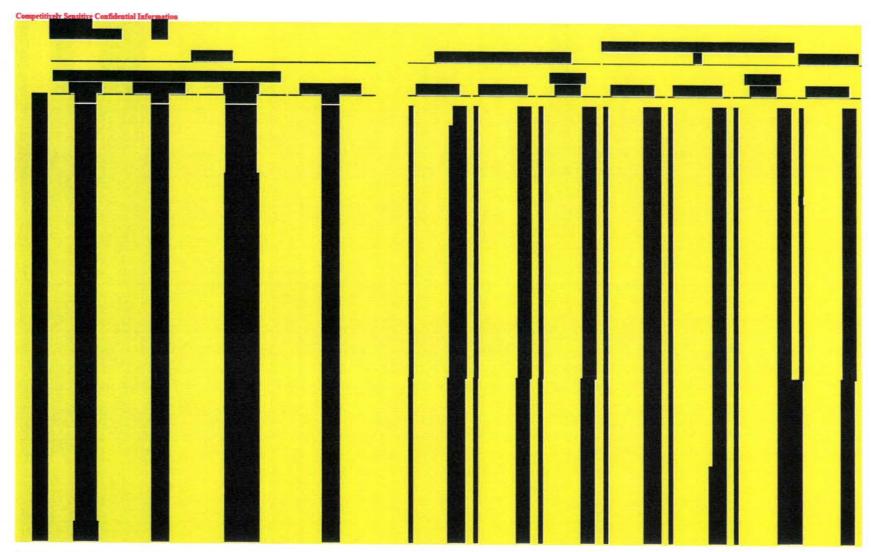
Competitively Sensitive Confidential Information



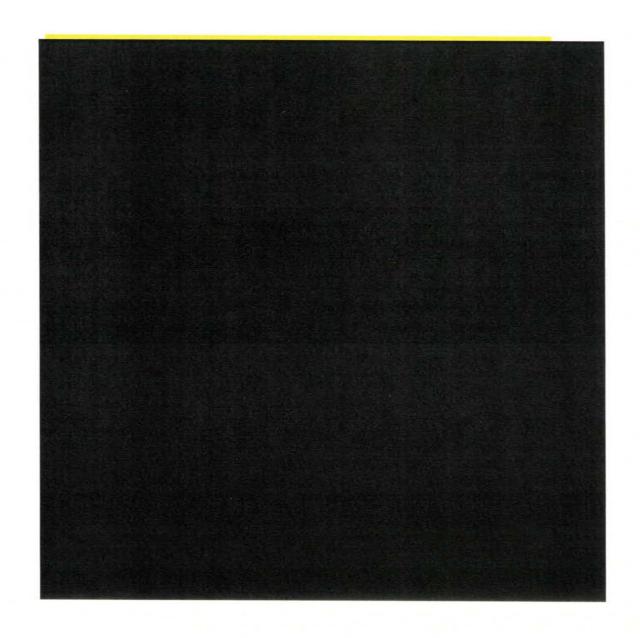


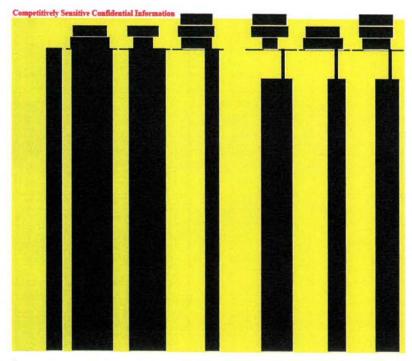
Notes:

The Osprey LCOE estimate includes a PPA starting in 2015 for 515 MW, with an acquisition in 2020 The Osprey LCOE estimate includes \$150 million in transmission costs.



Sources:
[1] Response to Question 6, Corrected Schedule from DEF's Response to Calpine's 1st Interrogatories, Docket No 140111, June 20, 2014, 14LGBRA-CALPINE1-6-DOC 1 CONFIDENTIAL Docket 140111-EI_Q6 xlsx
[2] Response to Question 4, Schedule from DEF's Response to Calpine's 1st Interrogatories, Docket No 140111, June 16, 2014, 14LGBRA-CALPINE1-4-Doc 1 Docket_140111-EI_Q4 xlsx

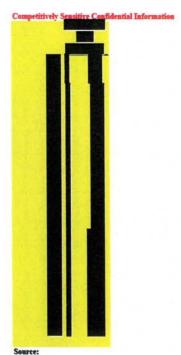




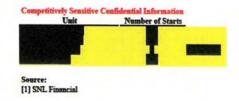
Source:
[1] Response to Question 7, Corrected Schedule from DEF's Response to Calpine's 1st Interrogatories, Docket No 140111, June 20, 2014, 14LGBRA-CALPINE1-7-DOC 4 CONFIDENTIAL Docket_140111-EI-Q7- Self Build P5 xlsx

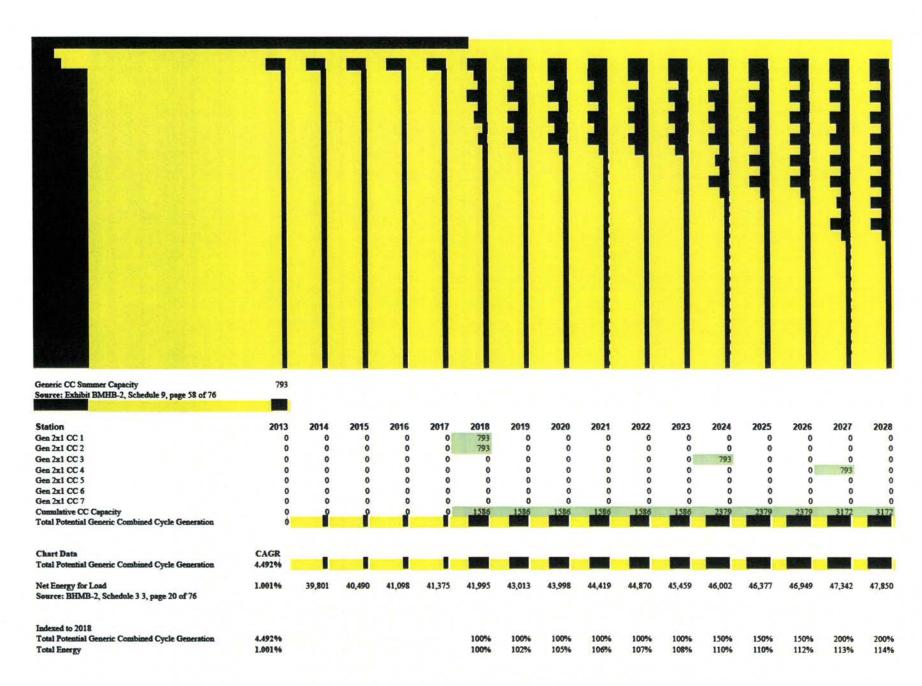


Sources:
[1] Response to Question 4, Schedule from DEF's Response to Calpine's 1st Interrogatories, Docket No 140111, June 16, 2014, 14LGBRA-CALPINE1-4-Doc 1 Docket 140111-EI_Q4 xlsx
[2] Response to Question 11, Schedule from DEF's Response to Calpine's 2nd Interrogatories, Docket No 140111, June 24, 2014, 14LGBRA-CALPINE2-Q11-000005 - 000006 Allowance Pricing 2013_0929 (2) xlsx



Source:
[1] Response to Question 5, Corrected Schedule from DEF's Response to Calpine's 1st Interrogatories, Docket No 140111, June 20, 2014, 14LGBRA-CALPINE1-5-DOC 1 CONFIDENTIAL Docket_140111-EI_Q5 (2) xlsx





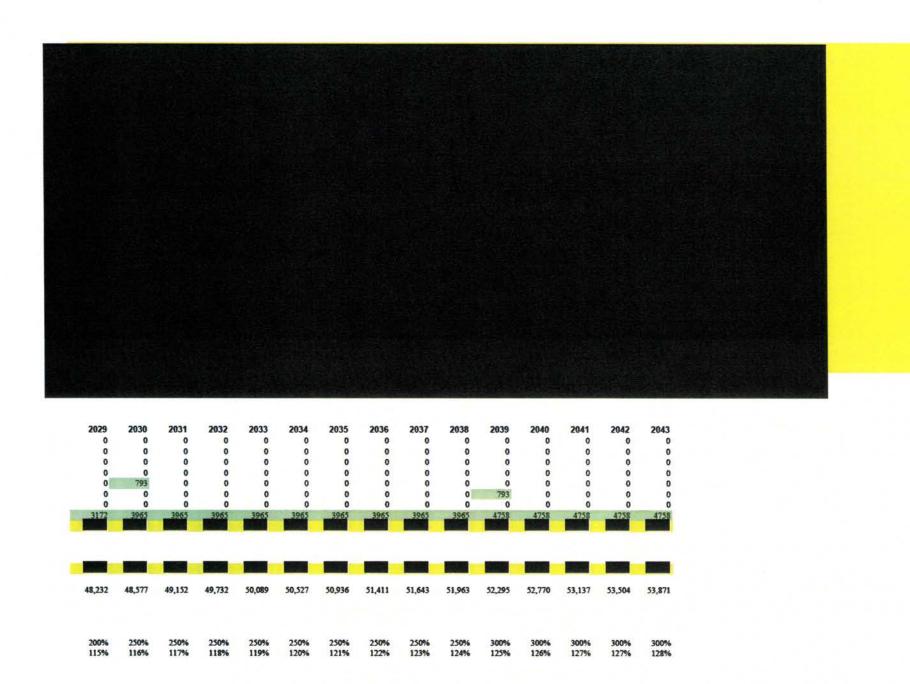
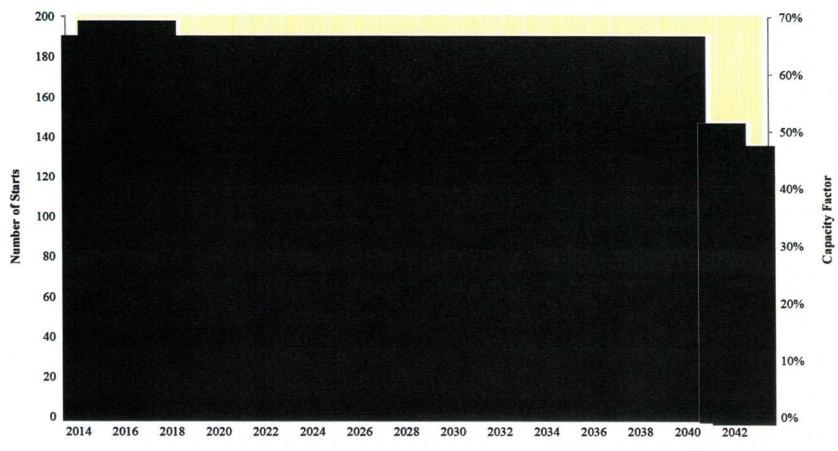


Exhibit PJH-6
Comparison of Osprey Capacity Factor and Starts, by Year
DEF Production Simulation Results, Scenario 5 Acquisition

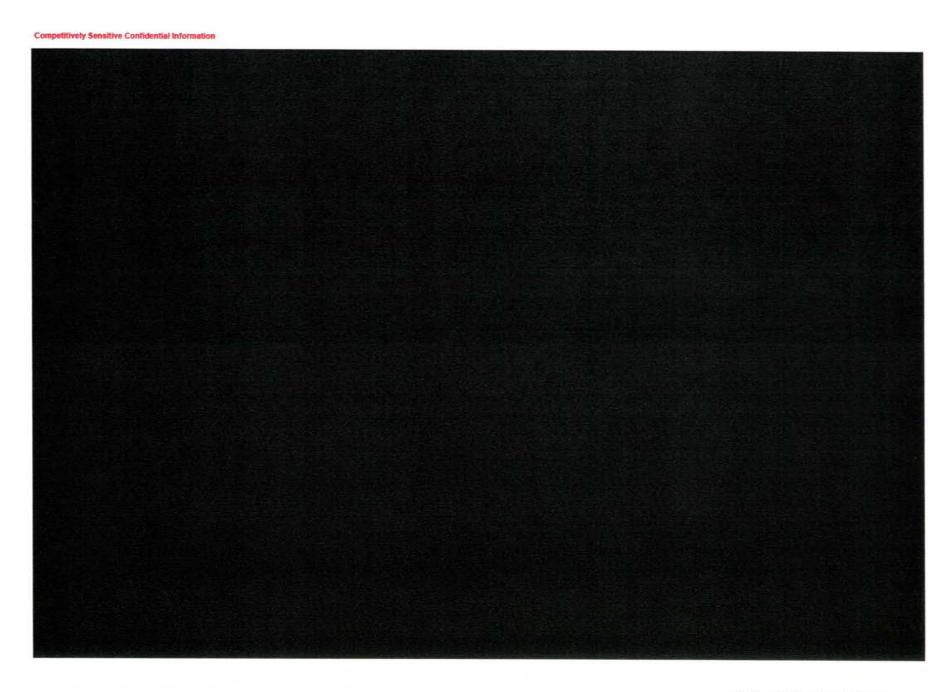


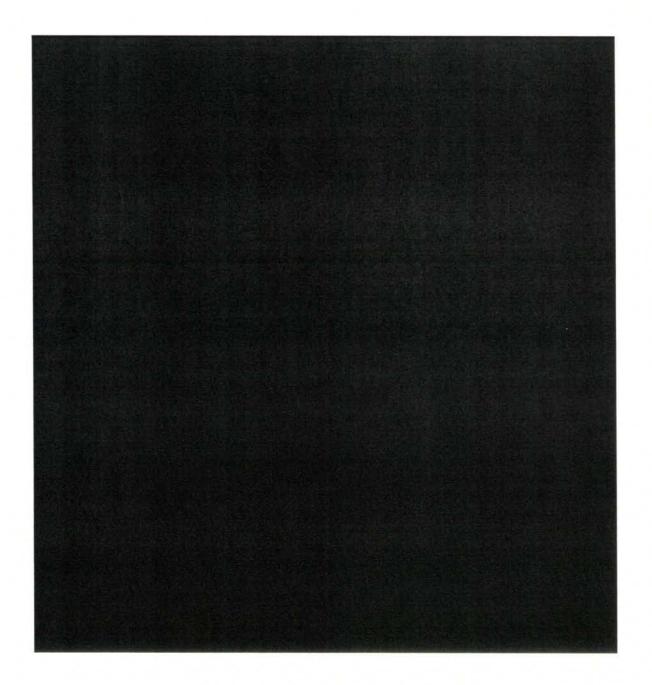
Notes:

Data is from Scenario 5. Acquisition 2. modeled as -\$193 m CPVRR relative to the DEF self-build proposal

Source:

[1] Duke Energy Florida, Inc., Response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories. (Nos. 1-9), Competitively Sensitive Confidential Response 6b and 7.





Competitively Sensitive Confidential Information

Exhibit PJH-7a Adjustments to Cumulative Present Value Revenue Requirement \$2014 millions

| | Original Value | Updated Value | CPVRR Impact |
|---|----------------|---------------|--------------|
| Duke Energy Florida Estimate | | | (\$193) |
| Fixed Cost Adjustment | | | |
| Updated PPA/acquisition offer | \$300 | | |
| Updated Estimate for Direct Connect Transmission Costs | | \$150 | |
| Gas Reservation Charge Adjustment | | | |
| Net Adjusted CPVRR: | | | \$133 |

Notes:

These adjustments include updates to fixed costs and other financial transactions, which are not expected to impact production cost modeling and energy dispatch outcomes.

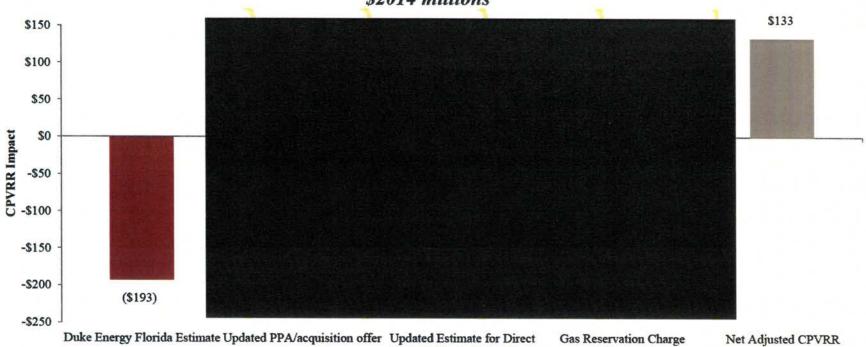
CPVRR impact is -\$193 m relative to DEF's self-build proposal. Adjustments are estimated assuming a 6.46% weighted average cost of capital with all assets fully depreciated by 2044. CPVRR adjusted impact includes estimated adjustments to rate base, depreciation, and deferred income taxes for capital expenses.

Estimate assumes a 5-year PPA for 515 MW, with capacity price payments starting at 2015 escalating to 2019.

Sources:

- [1] Exhibit BMHB-8, Acquisition 2.
- [2] Direct Testimony of Todd Thornton, 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 July 14, 2014, at 8.
- [3] Duke Energy Florida, Inc.'s Responses to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories. (Nos.1-9), Submitted June 16, 2014. Response 6a and g.

Exhibit PJH-7b Adjustments to Cumulative Present Value Revenue Requirement \$2014 millions



Connect Transmission Costs

Adjustment

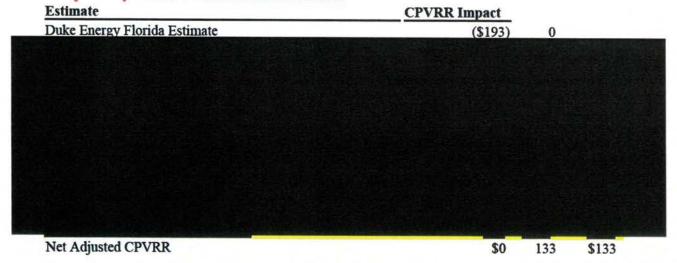
Notes:

These adjustments include updates to fixed costs and other financial transactions, which are not expected to impact production cost modeling and energy dispatch outcomes. CPVRR impact is -\$193 m relative to DEFs self-build proposal. Adjustments are estimated assuming a 6.46% weighted average cost of capital with all assets fully depreciated by 2044. CPVRR adjusted impact includes estimated adjustments to rate base, depreciation, and deferred income taxes for capital expenses Estimate assumes a 5-year PPA for 515 MW, with capacity price payments starting at

Sources:

- [1] Exhibit BMHB-8, Acquisition 2.
- [2] Direct Testimony of Todd Thornton, 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 July 14, 2014, at 8.
- [3] Duke Energy Florida, Inc.'s Responses to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories (Nos.1-9), Submitted June 16, 2014. Response 6a and g.

Competitively Sensitive Confidential Information



Journal | J. Cambiand Cycle Asset Life (35 years or general), Order No. PSC-10-0131-POF-EE, Issued March 5, 2010, at 19.

[2] Modified Accelerated Cost Recovery System, IRS Publication 946, Table A1 and 8-2, at 110.

[3] Direct Testimoney of Todd Thurston, In sec. Pedicion for Determination of Cost Effective Generation Alternative to Meet Need Prior to 2018 for Dube Energy Forcide, Inc., Dochet No. 140111-EE, volumined July 14, 2014, at 7.

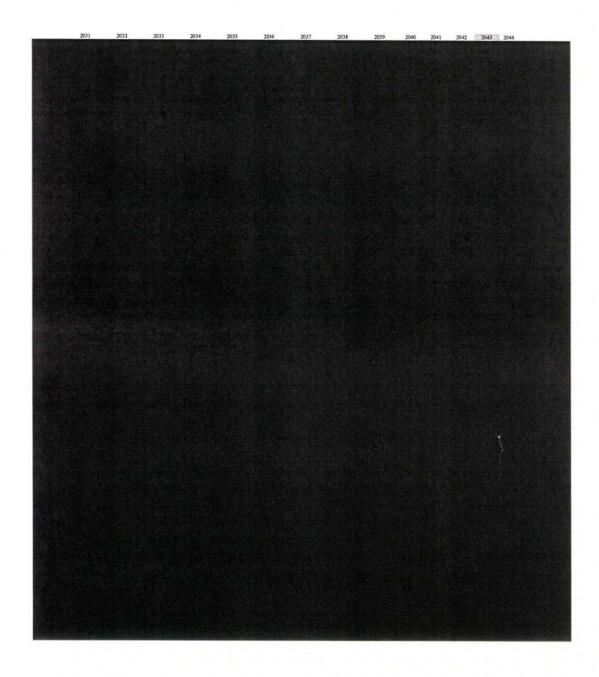
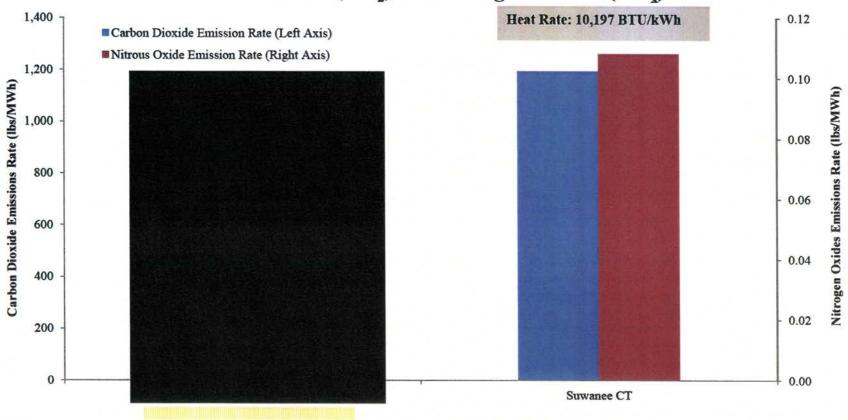


Exhibit PJH-8
Emission Rates by Technology
Carbon Dioxide (CO₂) and Nitrogen Oxides (NO_x)



Note:

[1] Emission rate is calculated as emission factor (lbs/MMBTU) multiplied by assumed heat rate (BTU/kWh).

Sources:

[1] DEF Energy Florida, Inc., response to Calpine Construction Finance Company, L.P.'s Second Set of Interrogatories to DEF Energy Florida, Inc. (NOS. 110-11), 10QB. "14LGBRA-CALPINE2-Q10b-000001 - 000004 Emission Rates 2013_0927.xlsx."

[2] DEF Energy Florida, Inc.'s responses to NRG Florida LP's First Interrogatories NOS. 1-108 to Duke Energy Florida, Inc., No. 27.

[3] SNL Financial.

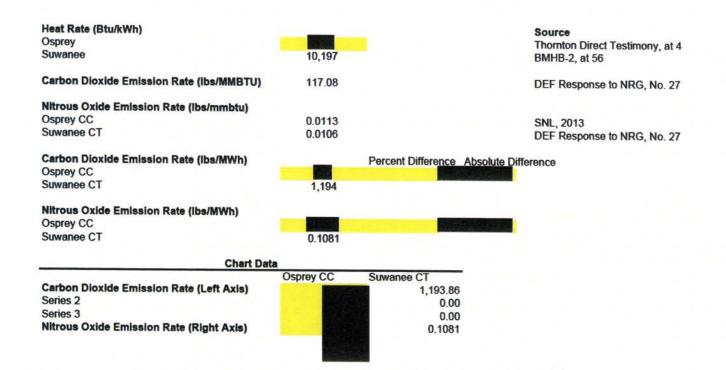


EXHIBIT C

CALPINE CONSTRUCTION FINANCE COMPANY, L.P. DOCKET NO. 140110-EI

Second Request for Confidential Classification Confidentiality Justification Matrix

THE FOLLOWING DOCUMENTS ARE ALL FROM WITNESS PAUL J. HIBBARD'S RESPONSES TO DEF'S 1ST REQUEST FOR PRODUCTION OF DOCUMENTS

ALL BATES NUMBERS BEGIN WITH: 1400110-140111.DEF1.DOC1__

| DOCUMENT | BATES NUMBER PAGE/ | JUSTIFICATION |
|-------------------|--------------------------|-----------------------|
| | LINE/COLUMN | |
| Excel SS - | DOC100005 | § 366.093(3)(d), Fla. |
| "Inputs for LCOE | Redacted in its entirety | Stat. |
| Model" | | § 366.093(3)(e), Fla. |
| | | Stat. |
| Excel SS - | DOC100006 | § 366.093(3)(d), Fla. |
| "Number of | Table redacted | Stat. |
| Starts" - | | § 366.093(3)(e), Fla. |
| "Summary" | | Stat. |
| Excel SS - Hourly | DOC100007-00008 | § 366.093(3)(d), Fla. |
| Operations Values | Redacted in its entirety | Stat. |
| - "Suw CT P1" | (All pages on CD only) | § 366.093(3)(e), Fla. |
| | | Stat. |
| Excel SS - Hourly | DOC100009-00010 | § 366.093(3)(d), Fla. |
| Operations Values | Redacted in its entirety | Stat. |
| - "Suw CT P3" | (All pages on CD only) | § 366.093(3)(e), Fla. |
| | 0AA 085 | Stat. |
| | | |
| Excel SS - Hourly | DOC100011-00012 | § 366.093(3)(d), Fla. |
| Operations Values | Redacted in its entirety | Stat. |
| - "OEC CC 1" | (All pages on CD only) | § 366.093(3)(e), Fla. |
| | | Stat. |
| Excel SS - Hourly | DOC100013-00014 | § 366.093(3)(d), Fla. |
| Operations Values | Redacted in its entirety | Stat. |
| - "OEC CC 2" | (All pages on CD only) | § 366.093(3)(e), Fla. |
| | | Stat. |
| Direct Testimony | DOC100015 | § 366.093(3)(d), Fla. |
| of Paul J. | Portions of Lines 8, 10, | Stat. |
| Hibbard (Exhibit | 11, 14, 15, 32, 34, 35 | § 366.093(3)(e), Fla. |
| No. PJH-2) | | Stat. |
| EXHIBIT PJH-3-4 | DOC100016 | § 366.093(3)(d), Fla. |
| "Panel" | Portions of Lines 12 and | |
| | 14 of table | § 366.093(3)(e), Fla. |
| | | Stat. |

| DOCUMENT | BATES NUMBER PAGE/ LINE/COLUMN | JUSTIFICATION |
|--|--|--|
| EXHIBIT PJH-3-4 "Little GBRA Scenarios Setup" | DOC100017-00030 Redacted in its entirety | § 366.093(3)(d), Fla. Stat. § 366.093(3)(e), Fla. Stat. |
| Direct Testimony of Paul J. Hibbard (Exhibit No. PJH-3) | DOC100031 Portions of Lines 1 and 2 in the "Notes" at the bottom of the Exhibit | § 366.093(3)(d), Fla. Stat. § 366.093(3)(e), Fla. Stat. |
| EXHIBIT PJH-3-4 "Cost-Curve Chart Data" | DOC100033-00034 Columns 2 and 3 redacted in their entirety | § 366.093(3)(d), Fla. Stat. § 366.093(3)(e), Fla. Stat. |
| Direct Testimony of Paul J. Hibbard (Exhibit No. PJH-4) | DOC100035 All of the graph and a portion of Line 1 of the "Notes" at the bottom of the Exhibit | § 366.093(3)(d), Fla. Stat. § 366.093(3)(e), Fla. Stat. |
| EXHIBIT PJH-3-4 "PPA Prices and O&M" | DOC100036-00037 Redacted in entirety except "Sources" | § 366.093(3)(d), Fla. Stat. § 366.093(3)(e), Fla. Stat. |
| EXHIBIT PJH-3-4 "Strategist Inputs" | DOC100039 Redacted in entirety except "Sources" | § 366.093(3)(d), Fla. Stat. § 366.093(3)(e), Fla. Stat. |
| EXHIBIT PJH-3-4 "Emissions Prices" | DOC100040 Redacted in entirety except "Sources" | § 366.093(3)(d), Fla. Stat. § 366.093(3)(e), Fla. Stat. |
| EXHIBIT PJH-3-4 "NG Prices" | DOC100041 Redacted in entirety except "Sources" | § 366.093(3)(d), Fla. Stat. § 366.093(3)(e), Fla. Stat. |
| EXHIBIT PJH-3-4 "SNL Starts" | DOC100042 Table contents redacted | § 366.093(3)(d), Fla. Stat. § 366.093(3)(e), Fla. Stat. |
| EXHIBIT PJH-5 "Data" | DOC100046-00047 Top table in its entirety. Portions of information under columns 2018-2043 | § 366.093(3)(d), Fla. Stat. § 366.093(3)(e), Fla. Stat. |

| DOCUMENT | BATES NUMBER PAGE/ | JUSTIFICATION |
|--|--------------------------|--|
| 14 Carl # 60 Carl 5 CAR # 60 Carl 6 C | LINE/COLUMN | |
| Direct Testimony | DOC100048 | § 366.093(3)(d), Fla. |
| of Paul J. | All of the graph and all | Stat. |
| Hibbard (Exhibit | of Lines 2 and 3 in the | § 366.093(3)(e), Fla. |
| No. PJH-6) | "Notes" at the bottom of | Stat. |
| | the Exhibit | |
| | | |
| EXHIBIT PJH-6 | DOC100049-00050 | § 366.093(3)(d), Fla. |
| "Chart Data" | Redacted in its entirety | And the state of t |
| | | § 366.093(3)(e), Fla. |
| | | Stat. |
| Direct Testimony | DOC100051 | § 366.093(3)(d), Fla. |
| of Paul J. | Parts of Lines 1, 2 and | Stat. |
| Hibbard (Exhibit | 3 of the "Fixed Cost | § 366.093(3)(e), Fla. |
| No. PJH-7a) | Adjustment" portion of | Stat. |
| | the table and portions | |
| | of Line 5 in the "Notes" | |
| | at the bottom of the | |
| | Exhibit | |
| | | |
| Direct Testimony | DOC100052 | § 366.093(3)(d), Fla. |
| of Paul J. | The center portion of | Stat. |
| Hibbard (Exhibit | the graph and portions | § 366.093(3)(e), Fla. |
| No. PJH-7b) | of Line 4 in the "Notes" | Stat. |
| | at the bottom of the | |
| | Exhibit | |
| EXHIBIT PJH-7 | DOC100053 | § 366.093(3)(d), Fla. |
| "Data for Chart" | All of chart except | Stat. |
| 200 101 011010 | first and last lines | § 366.093(3)(e), Fla. |
| | TITE and Tabe IIIIe | Stat. |
| EXHIBIT PJH-7 | DOC100054-00055 | § 366.093(3)(d), Fla. |
| "Calculations" | Last line of small | Stat. |
| 2772 TOTAL TO TOTAL TOTA | table; All of large | § 366.093(3)(e), Fla. |
| | table. | Stat. |
| Direct Testimony | DOC100057 | § 366.093(3)(d), Fla. |
| of Paul J. | All of the graph on the | Stat. |
| Hibbard (Exhibit | left. | § 366.093(3)(e), Fla. |
| No. PJH-8) | | Stat. |
| EXHIBIT PJH-8 | DOC100058 | § 366.093(3)(d), Fla. |
| "Chart Data" | Portions of Lines 2, 9, | Stat. |
| | 12, and 16-19 | § 366.093(3)(e), Fla. |
| | | Stat. |

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Petition for Determination |) | | |
|------------------------------------|---|--------|-----------------|
| of Need for Citrus County Combined |) | DOCKET | NO. 140110-EI |
| Cycle Power Plant, by Duke Energy |) | | |
| Florida, Inc. |) | FILED: | August 11, 2014 |
| |) | | |

AFFIDAVIT OF TODD THORNTON IN SUPPORT OF CALPINE CONSTRUCTION FINANCE COMPANY, L.P.'S SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF TEXAS

COUNTY OF HARRIS

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

- 1. My name is Todd Thornton. I am over the age of 18 years old and I have been authorized by Calpine Construction Finance Company, L.P. ("Calpine") to give this affidavit in the above-styled proceeding on Calpine's behalf and in support of Calpine's Second Request for Confidential Classification. I have personal knowledge of the matters stated in this affidavit.
- 2. I am Senior Vice President, Origination and
 Development, for Calpine Corporation. Calpine is a subsidiary
 of Calpine Corporation. My business address is 717 Texas
 Avenue, Houston, Texas 97002. I am responsible for Calpine
 Corporation's origination activities and the development of
 electric generation resources throughout the United States and
 Canada.

- 3. Calpine is seeking confidential classification for portions of certain documents that it produced in response to Duke Energy Florida, Inc.'s First Request for Production of Documents. The documents consistent of certain workpapers, calculations, and exhibits of Calpine's witness Paul Hibbard, as more specifically identified in Exhibits A and C of Calpine's Second Request for Confidential Classification.
- 4. Calpine is requesting confidential classification of this information because it is competitively sensitive confidential business information, it contains information concerning Calpine's confidential bids and other contractual data, and it contains Calpine's confidential and proprietary internal pricing and project development strategies. This information would adversely impact Calpine's competitive business interests and otherwise harm Calpine if disclosed to third parties.
- 5. The information identified in Exhibit A and Exhibit C is intended to be and is treated as confidential by Calpine and has not been disclosed to the public.

6. This concludes my affidavit.

Todd Thornton

Senior Vice President, Origination

and Development

Calpine Corporation 717 Texas Avenue

Houston, Texas 97002

sworn To AND SUBSCRIBED before me this A day of August,

2014, by Todd Thornton, who is personally known to me or who has

produced __________(type of identification)

as identification and who did take an oath.



Notary Public State of Texas

My Commission Expires: 6-1-17