

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Need for Citrus County Combined) DOCKET NO. 140110-EI
Cycle Power Plant) Submitted for filing: August 21, 2014
_____)

**DUKE ENERGY FLORIDA, INC.'S
NOTICE OF FILING VERIFIED AFFIDAVITS**

Duke Energy Florida, Inc. ("DEF") hereby gives notice of service of verified affidavits as follows:

1. Affidavit of Benjamin M.H. Borsch in support of responses to Staff's Third Set of Interrogatories (Nos. 50-54);
2. Affidavit of Benjamin M.H. Borsch in support of responses to Staff's Fourth Interrogatories to Duke Energy Florida, Inc. (Nos. 55-56); and
3. Affidavit of Benjamin M.H. Borsch in Support of Duke Energy Florida, Inc.'s Sixth Request for Confidential Classification.

Respectfully submitted this 21th day of August, 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 this 21st day of August, 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 Sayler
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
Sayler.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

Linda Loomis Shelley
Buchanan Ingersoll & Rooney /
Fowler White Boggs PA
101 North Monroe Street, Ste. 1090
Tallahassee, FL 32301
Phone: (850) 681-4260
Email: linda.shelley@bipc.com

Alan Seltzer
John Povilaitis
Buchanan Ingersoll & Rooney /
Fowler White Boggs PA
409 North Second Street, Ste. 500
Harrisburg, PA 17101-1357
Phone: (717) 237-4825/(717) 237-4825
Email: Alan.seltzer@bipc.com
John.povilaitis@bipc.com

Amy Fisher
Managing Director
GE Energy Financial Services, Inc.
800 Long Ridge Road
Stamford, CT 062927
Email: amy.fisher@ge.com

George Cavros
Southern Alliance for Clean Energy
120 E. Oakland Park Blvd, Ste. 105
Fort Lauderdale, FL 33334
Phone: (954) 295-5714
Facsimile: (866) 924-2824
Email: george@cavros-law.com

AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF PINELLAS)

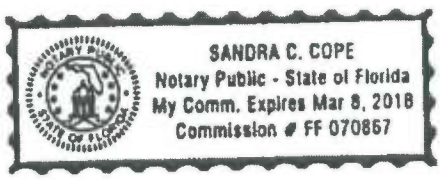
I hereby certify that on this 21st day of August, 2014, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Benjamin M.H. Borsch, who is personally known to me, and he acknowledged before me that he provided the response to interrogatory numbers 50-54 from STAFF'S THIRD SET OF INTERROGATORIES (Nos. 50-54) in Docket No(s). 140110-EI, and that the response is true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 21st day of August, 2014.


Benjamin M.H. Borsch


Notary Public
State of Florida, at Large

My Commission Expires:



AFFIDAVIT


STATE OF FLORIDA)

COUNTY OF PINELLAS)

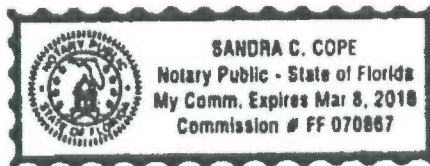
I hereby certify that on this 21st day of August, 2014, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Benjamin M.H. Borsch, who is personally known to me, and he acknowledged before me that he provided the response to interrogatory numbers 55-56 from STAFF'S FOURTH INTERROGATORIES TO DUKE ENERGY FLORIDA, INC. (NOS. 55-56) in Docket No(s). 140110-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 21st day of Aug, 2014.


Benjamin M.H. Borsch


Notary Public
State of Florida, at Large

My Commission Expires:



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)	
of Need for Citrus County Combined)	DOCKET NO. 140110-EI
Cycle Power Plant)	Submitted for filing: August 5, 2014
_____)	

AFFIDAVIT OF BENJAMIN M.H. BORSCH IN SUPPORT OF DUKE ENERGY FLORIDA, INC.'S SIXTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Benjamin M.H. Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin M.H. Borsch. I am over the age of 18 years old and I have been authorized by Duke Energy Florida, Inc. (hereinafter "DEF" or the "Company") to give this affidavit in the above-styled proceeding on DEF's behalf and in support of DEF's Request for Confidential Classification. The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Director, IRP & Analytics – Florida. I am responsible for resource planning for Duke Energy Florida, Inc. I am responsible for directing the resource planning process in an integrated approach to finding the most cost-effective alternatives to meet the Company's obligation to serve its customers in Florida. As a result, we examine both supply-side and demand-side resources available and potentially available to the Company over its planning horizon, relative to the Company's load forecasts, and prepare and present documents that are filed with the Florida Public Service Commission ("FPSC" or the "Commission"), in accordance with the applicable statutory and regulatory requirements.

3. DEF is seeking confidential classification for portions of responses to Staff's First Set of Interrogatories (Nos. 1-43) and Staff's First Request for Production of Documents (Nos. 1-

6). A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Sixth Request for Confidential Classification and is outlined in DEF's Justification Matrix that is attached to DEF's Sixth Request for Confidential Classification as Exhibit C.

4. DEF is requesting confidential classification of this information because it is competitively sensitive confidential business information and contains DEF's confidential and proprietary internal strategies and analysis studies or those of DEF's vendors. This information would adversely impact DEF's competitive business interests if disclosed to third parties.

5. The disclosure of this information would impair the efforts of the Company to negotiate contracts on favorable terms, as well as violate contractual nondisclosure provisions of these bids. Specifically, if DEF's suppliers or competitors were made aware of DEF's internal strategies and analysis studies, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition and provision of goods, materials, and services. DEF must be able to ensure potential bidders that the terms of their bids will be kept confidential. If such assurances are not provided, potential bidders know that the terms of their bids are subject to public disclosure, they might withhold sensitive information necessary for the utility to fully understand and accurately assess the costs and benefits of their proposals. Persons or companies who otherwise would have submitted bids in response to the utility's RFPs might not do so if there is no assurance that their proposals would be protected from disclosure.

6. DEF negotiates with potential third party vendors to obtain competitive contracts for services that provide economic value to DEF and its ratepayers. In order to obtain such contracts, however, DEF must be able to assure these companies that sensitive business information will be kept confidential. DEF has kept confidential and has not publicly disclosed any of its confidential contract terms, including pricing. Absent such measures, these companies

would run the risk that sensitive business information that they provided in their contracts with DEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who would otherwise contract with DEF might decide not to do so if DEF did not keep those terms of their contracts confidential. Without DEF's measures to maintain the confidentiality, the Company's efforts to obtain competitive contracts would be undermined.

7. The information identified as Exhibit A is intended to be and is treated as confidential by the Company. The information has not been disclosed to the public, and the Company has treated and continues to treat the information as confidential. Upon receipt of the proposals and contracts at issue, and with its own confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist the Company, and restricting the number of, and access to the information and contracts.

8. At no time since receiving or generating the bid proposals, contracts, and business analysis studies in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

9. This concludes my affidavit.

Dated the 11th day of August, 2014.



(Signature)

Benjamin M.H. Borsch
Director – IRP & Analytics – Florida
Duke Energy Florida, Inc.
299 First Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 11th day of August, 2014 by Benjamin M.H. Borsch. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

Jeanne L. Costello
(Signature)

Jeanne L. Costello
(Printed Name)

NOTARY PUBLIC, STATE OF Florida

Feb 21, 2017
(Commission Expiration Date)

EE 866866
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

