

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: September 3, 2014

DUKE ENERGY FLORIDA, INC.'S NOTICE OF FILING AFFIDAVIT IN SUPPORT OF NINETEENTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

Duke Energy Florida, Inc. ("DEF") hereby gives notice of filing the affidavit of Mark E. Landseidel in support of Duke Energy Florida, Inc.'s Nineteenth Request for Confidential Classification.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and overnight mail this 3rd day of September, 2014.

/s/ Blaise N. Gamba

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**AFFIDAVIT OF MARK E. LANDSEIDEL
IN SUPPORT OF DUKE ENERGY FLORIDA, INC.'S
NINETEENTH REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA)

COUNTY OF MECKLENBURG)

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

1. My name is Mark E. Landseidel and I am employed by Duke Energy Corporation. 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 of Project Development and Initiation in the Duke Energy Corporation Project Management and Construction ("PMC") Department. In this role, I am responsible for the initiation and development of major non-nuclear generation projects for Duke Energy Florida, Inc. ("DEF" or the "Company"). As Director of Project Development, I have responsibility and management oversight for the projects proposed by DEF in this docket.

3. DEF is seeking confidential classification for portions of a second supplemental response to NRG Florida LP's Fourth Request for Production of Documents No. 36. A detailed description of the confidential information at issue is contained in confidential Exhibit A to

DEF's Nineteenth Request for Confidential Classification and is outlined in DEF's Justification Matrix that is attached to DEF's Nineteenth Request for Confidential Classification as Exhibit C.

4. DEF is requesting confidential classification of this information because it is competitively sensitive confidential business information which contains confidential and proprietary business information and competitively sensitive contract information including confidential terms and conditions of vendor contracts. 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 offers. Specifically, if DEF's suppliers or competitors were made aware of DEF's contracting strategies, 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 also be able to ensure potential suppliers that the terms of their contracts will be kept confidential. 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.

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 its confidential contract terms and conditions. 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 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 29th day of August, 2014.



(Signature)

Mark E. Landseidel
Duke Energy Corporation
400 South Tryon Street
Charlotte, NC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 29th day of August, 2014 by Mark E. Landseidel. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

Muriel R. Spear
(Signature)

MURIEL R. SPEAR
(Printed Name)

NOTARY PUBLIC, STATE OF North Carolina

October 20, 2018
(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)

(Serial Number, If Any)