

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Duke Energy Florida, Inc.
for approval of Nuclear Decommissioning
Cost Study

Docket No. 140057-EI
Submitted for Filing: September 3, 2014

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COMMISSION
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REDACTED DUKE ENERGY FLORIDA, INC.'S SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION

Duke Energy Florida, Inc. ("DEF" or the "Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(3), Florida Administrative Code, files this Request for Confidential Classification of the confidential portions of the documents provided in response to the Florida Public Service Commission Staff's Third Data Request (Nos. 1.a through 1.e). Specifically, the documents responsive to Third Data Request No. 1.b contains confidential financial and contractual information the disclosure of which would in many cases violate contractual confidentiality clauses, and other information the disclosure of which would impair DEF's competitive business interests if disclosed to third parties. This information meets the definition of proprietary confidential business information under section 366.093(3), Florida Statutes. The unredacted documents are being filed under seal with the Commission on a confidential basis to keep the competitive business and contractual information in the documents

COM _____ confidential.

AFD 2

APA _____

ECO 3+ redacted
EXB

BASIS FOR CONFIDENTIAL CLASSIFICATION

ENG 1

GCL 1

IDM _____

TEL _____

CLK _____

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 customers 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, 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.

Portions of the aforementioned document should be afforded confidential classification for the reasons set forth in the Affidavit of Ivan L. Wilson filed in support of DEF's Second Request for Confidential Classification, and for the following reasons.

DEF's Response to Staff's Third Data Request (Nos. 1.a-1.e), specifically the document produced in response to No. 1.b, contains confidential budget allocations based on a detailed analysis of proposed vendor costs. See Affidavit of Wilson, ¶ 3. DEF and its vendor consider this information to be confidential and proprietary in nature, and continue to take steps to protect against its public disclosure, including limiting the personnel who have access to this information. Id. at ¶ 6. The Company must be able to assure vendors that sensitive business information, such as the terms of their proposals and contracts and their confidential work product will be kept confidential. Indeed, if third parties were made aware of confidential cost estimates that the Company has with and from other parties, third parties may use this information to DEF's detriment and may offer DEF less competitive contractual terms in future contractual negotiations regarding this project and other projects. Id. at ¶¶ 4-5. Without DEF's

measures to maintain the confidentiality of cost information and estimates between DEF and its contractors, the Company's efforts to obtain competitive contracts would be undermined. *Id.* at ¶ 4.

Further, the Company has established and follows strict procedures 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. *Id.* at ¶ 6. At no time has the Company publicly disclosed the confidential information at issue; DEF has treated and continues to treat the information at issue as confidential. *Id.* at ¶ 6.

DEF requests this information be granted confidential treatment by the Commission.

Conclusion

The competitive, confidential documents 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 Request for 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 the documents of provided with DEF's Response to the Florida Public Service Commission Staff's Third Data Request (Nos. 1.a-1.e), specifically numbers 1.b, be classified as confidential for the reasons set forth above.

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 U.S. Mail this 3rd day of September, 2014.

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**DUKE ENERGY FLORIDA, INC.'S
SECOND
REQUEST FOR CONFIDENTIAL
CLASSIFICATION**

EXHIBIT B

REDACTED

Organization	Vendor	2014	2015	2016
Site Costs (See Non-Labor tab)				
Special Items & charges by Others	Relocation			
Currently in system	Minor Projects			Discretionary funds for unknown needs
	Nuc. Engineering			None planned but funded
	Corp Gen & Dev Inc			
	Fleet Centralized Training			
	Pubsubline			15 & 18 unknown at the time
	Nuc. Operations			
	Nuc. Protective Services			
	Nuc. Support Services (Reactor)			
	Dig. Effectiveness			Expected to decline but held steady
	Reg. Affairs			
	Corporate IT			
	Env. Health & Services			
	HR Operations			
	Major Projects			2014 is Cyber Security, 2015 is contingency
	Nuclear GD			
	Nuclear Insurance			
	Nuclear Other			
	NOS			
	Reg Utility Finance			
	STAR (Domestic)			
	Supply Chain			
Ext. not in system	Real			refed storage and fuel storage
	Fuel Mgmt			
	HQO Document Mgmt			
	HQO Digital System			
	Corporate Allocations			
	Total			

Note:

In 2013 the full amount for severance was accrued and recognized, however the amount assumed for DFO personnel severance should be reflected in the Decommissioning costs at their expected release date. See the Severance Estimate tab for current DFO and Non-DFO amounts.

Vendor	2013	2015	2016	Comments
A Able / AM, Septic				air station repairs
Advanced Disposal (Yonkers)				trash disposal / recycling - should decrease as plant staff decreases
Advanced Waste Solutions				trash disposal / recycling - should decrease as plant staff decreases
Adco Pest				pest control
Air/Water Permits & Tank Fees-Emission				
All Pro Cleaning				floor cleaning
Amberite				
ANB				
AurCAD License				marine biologic of growth control
Betz Dearborn				plumber - should decrease as plant staff decreases
Bob Tractor Plumbing				
Boron 3D Analysis				
Bottled Water for Site/Fitness Center				
BrightHouse Cable				
Calendars/Brochures				
CE & Electric (SOM)				
CE's Maintenance				
Calibrations, Employee Recognitions - Site				
Chemical Investigations - Brushing air testing				
Chemicals - hydrogen, nitrogen, oxygen				
Chemicals/GI Betz				
Chemistry Misc. Contracts				metal cleaning
Chimex				
Cities County				
Citrus County Landfill				
Clear - GRAC				
Clear Non Carpet Clng				
Coffee				
Commercial Roofing				roof rep repairs
Company Vehicles				
Computer Power Sys				
Continuing Trng - Vendor				
Contracts				
Copper Leases				
Copper Maint.				
CR 3 NEI Annual Fee / Force on Force				
DEMI				
Direct TV				
Docking - One Tech / Liquid Energy				
Doris - Misc				
Doors and Fees				
Elec Visions Incorp				
Elevators - Innow. Elev.				elevator maintenance
Empal Part Incinerator				
Employee Recognition				
Employment contracts - State of FL				
EQF Bid, Maint.				
EQF Simulator				
EQF Simulator Subscription				
EQF Utilities				
Essential Systems LLC				
Espe/Perkins				
FEMA/EDS				
Fire Brigade Request				
Fire Protection				fire extinguisher inspection / misc maint
Fitness Center Maintenance				
Fleet Workshops				
Furniture/Equipment				
General Engineering - Not sample analysis				
Hazardous waste contracts				crane maintenance
Hoist & Crane Service				
HydroSphere - chemical toxicity testing				
ICP Essential Service Contract				
Inter Callings				
Instructional Training				
Inventory Disposal and Surplus				
Interview Expenses				
Lab Consumables				
Laundry contracts				
Leadership				
Levy County				
Lithium/Permits				
Mailings				
Maps/Graphic				
Materials w/Orders				
Materials - Chemistry				
Materials - Chemistry				
Materials - Electronic Dosimeter Reg				

Vendor	2014	2016 Adjusted	% Station Cost (Transit)	% Person Cost	\$ Person Cost	Station Cost Wet	% reduction steady state wet	% reduction wet to dry	Station Cost Dry	Station Cost No Fuel	2015	2016	Comments
A Able / Mr. Septic													lift station repairs
Advanced Disposal (Veeva)													trash disposal / recycling - should decrease as plant staff decreases
Advanced Waste Solutions													port & pots / trash disposal - should decrease as plant staff decreases
Aero Perf													pest control
Air/Water Permit & Tank Fees Environ													
All Pro Cleaning													floor cleaning
Analytics													
ANII													
AutoCAD License													marine biological growth control
Betz Dearborn													plumber - should decrease as plant staff decreases
Bob Tsaclos Plumbing													
Boron 10 Analysis													
Bottled Water for Site/Fitness Center													
Brightsource Cable													
Calendars/Brochures													
CCB Electric (SON)													
CCB Maintenance													
Celebrations, Employee Recognitions - site													
Channel Innovations - Breathing Air Testing													
Chemicals - hydrogen, nitrogen, oxygen													
Chemicals/GS Betz													
Chemistry Misc. Contracts													mat cleaning
CM&S													
Citrus County													
Citrus County Landfill													
CMH - SR&MC													Should be reviewed for inclusion
Crj Rem Carpet Clog													rest roof repairs
Coffee													
Commercial Roofing													
Company Vehicles													
Computer Power Sys													
Continuing Trng - Vendor													
Contracts													
Copier Leases													
Copier Maint													
CR3 NE Annual Fee / Force on Force													
DEM													
Direct TV													
Diving - Dive Tech / Liquid Engrg													
Dues - Misc													
Dues and Fees													
Elec Visions Incorp													elevator maintenance
Elevators - Innov. Elev.													
Empl Perf Incentives													
Employee Recognition													
Environmental contracts - State of FL													
EDF Bus Maint													
EDF Simulator													
EDF Simulator Subscription													
EDF Utilities													
Exventual Systems LLC													
Fees/Permits													
TEMA/DHS													
Fire Brigade Requal													fire extinguisher inspections / misc maint
Fire Protection													
Fitness Center Maintenance													
Fleet Workshops													
Furniture/Equipment													
General Engineering - Hot sample analysis													
Hazardous waste contracts													crane maintenance
Hoist & Crane Service													Should be reviewed for inclusion
HydroSphere - Chlorine Toxicity Testing													
ICP Essential Service Contract													Should be reviewed for inclusion
Imit Call/Rep													Should be reviewed for inclusion
Instructor Training													
Inventory Disposal and Surplus													
Interview Expenses													Should be reviewed for inclusion
Lab Consumables													
Laundry Contracts													
Leadership													
Levy County													
Licenses/Permits													
Mailings													
Maps/Graphics													
Materials w/Burdens													
Materials - Chemistry													
Materials - Chemistry													Should be reviewed for inclusion
Materials - Electronic Dosimeter Repl													Should be reviewed for inclusion
Materials (Human Perf, Relay for Life, March of Dimes, etc)													Should be reviewed for inclusion
Mathcad License													
Meals/Travel													
Memberships													
Memberships													
Memberships & Dues													
Misc Other													
Misc. Materials													
Mobile Satellite Phone													
M/W Demin skid rental													

DUKE ENERGY FLORIDA DOCKET 140057-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix
ATTACHMENT C

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
14NDS-FPSCDR3-1b-000006	Lines 7 through 39, all information in columns C, D, and E titled 2014, 2015 and 2016; Line 11 include note in column F; Lines 48 through 197, all information in columns C, D, and E titles 2014, 2015 and 2016; Charts shown under caption CR3 Severance Calculation, Chart 1 Summary of Individuals Impacted and Disposition, all information shown under headings Non-Union, Union and Total, Chart 2 Accrual Computation Summary, all information under 3 rd through 8 th columns (excel numbered lines 205 through 230), Chart 3 all information exclusive of column headings, Worksheet 2014 O&M Budget – Draft, all information in columns headed Labor, Benefits, Contracts, Materials, Other and Totals	<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>
14NDS-FPSCDR3-1b-000007	All information in columns 3 through 14	<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</p>

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Second Request for Confidential Classification
Confidentiality Justification Matrix
ATTACHMENT C

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.