FILED APR 27, 2015 DOCUMENT NO. 02347-15 FPSC - COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination that)	DOCKET NO. 150043-EI
the Osprey Plant Acquisition and,)	
alternatively, the Suwannee Simple)	Submitted for filing: April 27, 2015
Cycle Project is the most Cost Effective)	
Generation Alternative to meet the)	
Remaining Need Prior to 2018 for)	
Duke Energy Florida, Inc.)	
)	

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

Duke Energy Florida, Inc. ("DEF") hereby gives notice of filing the verified affidavit of

Mark E. Landseidel in support of DEF's Fourth Request for Confidential Classification.

Respectfully submitted this 27th day of April, 2015.

/s/ Blaise N. Gamba James Michael Walls John T. Burnett Deputy General Counsel Florida Bar No. 0706242 Dianne M. Triplett Blaise N. Gamba Associate General Counsel Florida Bar No. 0027942 DUKE ENERGY FLORIDA, INC. CARLTON FIELDS JORDEN BURT, P.A. Post Office Box 14042 Post Office Box 3239 St. Petersburg, FL 33733-4042 Tampa, FL 33601-3239 Telephone: (727) 820-5587 Telephone: (813) 223-7000 Facsimile: (727) 820-5519 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 27TH day of April. 2015.

/s/ Blaise N. Gamba Attorney

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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AFFIDAVIT OF MARK E. LANDSEIDEL IN SUPPORT OF DUKE ENERGY FLORIDA, INC.'S FOURTH 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. I am over the age of 18 years old and I have been authorized by Duke Energy Florida (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. This section is responsible for the initiation and development of major non-nuclear generation projects for DEF.

 As the Director of Project Development, I have responsibility and management oversight for the Suwannee Simple Cycle combustion turbine project for the Company.
- 3. DEF is seeking confidential classification for the documents provided in its supplemental response to Staff's First Request for Production of Documents No. 2. A detailed description of the confidential information at issue is contained in confidential Exhibit A to

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

- 4. DEF is requesting confidential classification of these documents because they contain proprietary and confidential competitive business information and contractual data and competitively sensitive commercial information and financial data, the disclosure of which would adversely impact DEF's and its vendor's competitive business interests.
- 5. When vendors are submitting proposals to, contracting with, and/or providing information to DEF the Company must be able to assure these vendors that sensitive business information, including negotiated terms, will be kept confidential. Indeed, most of the documents at issue contain confidentiality provisions that prohibit disclosure to third parties. If third parties were made aware of confidential 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 this information, the Company's efforts to obtain competitive services would be undermined.
- 6. The information identified as Exhibit A is intended to be and is treated as confidential by the Company. If this information was disclosed to the public, it could adversely impact DEF's competitive interests. Without DEF's measures to maintain the confidentiality, the Company's efforts to obtain competitive contracts would be undermined.
- 7. Upon receipt of confidential information from suppliers and transportation providers, 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. At no time since

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receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

Dated the 24th day of April, 2015.

(Signature)

Mark E. Landseidel

Director of Project Development and Initiation

Duke Energy Corporation 400 South Tryon Street

Charlotte, NC

of April, 2015 by Mark E. Landseidel	MENT was sworn to and subscribed before me this day. He is personally known to me, or has produced his as identification.
SHANNON L. WALL Notary Public, North Carolina Mecklenburg County My Commission Expires June 17, 2017	Shamf-Wall (Signature) Shannon L Wall
	(Printed Name)
(AFFIX NOTARIAL SEAL)	NOTARY PUBLIC, STATE OF
	(Commission Expiration Date)
	(Serial Number, If Any)

3