

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery Clause

Docket No. 150009-EI
Submitted for Filing: June 24, 2015

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DUKE ENERGY FLORIDA, INC.'S NOTICE OF FILING

Duke Energy Florida, Inc. ("DEF" or the "Company"), hereby gives notice of filing the Affidavits of Christopher M. Fallon, Mark R. Teague, and Thomas G. Foster in Support of Duke Energy Florida, Inc.'s Sixth Request for Confidential Classification.

Respectfully submitted,

/s/ Blaise N. Gamba
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COM _____
AFD 1
APA 1
ECO 1
ENG 1
GCL 1
IDM 2
TEL _____
CLK _____

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 24th day of June, 2015.

/s/ Blaise N. Gamba
Attorney

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery
Clause

Docket No. 150009-EI
Submitted for Filing: June 24, 2015

**AFFIDAVIT OF CHRISTOPHER M. FALLON IN SUPPORT OF DUKE ENERGY
FLORIDA, INC.'S SIXTH REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Christopher M. Fallon. I am employed by Duke Energy Corporation ("Duke Energy") in the capacity of Vice President of Nuclear Development. I am over the age of 18 years old and I have been authorized to give this affidavit in the above-styled proceeding on Duke Energy Florida's ("DEF" or the "Company") behalf and in support of DEF's Sixth Request for Confidential Classification. The facts attested to in my affidavit are based upon my personal knowledge.

2. As Vice President of Nuclear Development, I am responsible for the Levy Nuclear Project ("Levy").

3. DEF is seeking confidential classification for portions of the Florida Public Service Commission Staff-Generated Financial Auditors' Workpapers (the "Workpapers"). These documents contain confidential contractual cost information, asset disposition information and strategies, and vendor invoice and cost information as well as internal labor information. This information is competitively sensitive business information the disclosure of which would impair DEF's competitive business interests. A detailed description of the confidential

information at issue is contained in confidential Attachment A to DEF's Request and is outlined in DEF's Justification Matrix that is attached to the Request as Attachment C.

4. The Company is requesting confidential classification of this information because included in the auditors' Workpapers is *wind-down* cost information related to the Company's Engineering, Procurement and Construction ("EPC") Agreement and Levy project the disclosure of which would harm DEF's competitive business interests and violate contractual confidentiality agreements. Additionally, the Levy-related portions of the Workpapers include long lead equipment disposition strategies and information which if publicly disclosed could impair DEF's competitive business interests and ability in negotiations, and in certain instances violate contractual confidentiality provisions with equipment vendors.

5. Additionally, vendor invoice information is included in the Workpapers and if such information was disclosed to DEF's competitors and/or other potential suppliers, DEF's efforts to obtain competitive service that provide economic value to both the Company and its customers could be compromised by the Company's competitors and/or suppliers changing their offers, consumption, or purchasing behavior within the relevant markets.

6. DEF must also be able to assure its existing and future vendors that sensitive business information, such as the pricing terms of their contracts, will be kept confidential. If other third parties were made aware of confidential contractual terms that DEF has with other parties, they may offer less competitive contractual terms in future contractual negotiations.

7. Upon receipt of all this confidential information, 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. At no time since negotiating and receiving the

information in question has the Company publicly disclosed the information or the terms of the documents at issue. The Company has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated this 22 day of June, 2015.

Christopher M Fallon
(Signature)
Christopher M. Fallon

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 22nd day of June, 2015 by Christopher M. Fallon. He is personally known to me, or has produced his NC 8956778 driver's license, or his _____ as identification.



E. J. Woolard
(Signature)

E. J. Woolard
(Printed Name)

NOTARY PUBLIC, STATE OF North Carolina

August 14, 2016
(Commission/Expiration Date)

(Serial Number, If Any)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery
Clause

Docket No. 150009-EI
Submitted for Filing: June 24, 2015

**AFFIDAVIT OF MARK R. TEAGUE IN SUPPORT OF DUKE ENERGY
FLORIDA, INC.'S SIXTH REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Marcus ("Mark") R. Teague, who being first duly sworn, on oath deposes and says that:

1. My name is Mark R. Teague. I am employed by Duke Energy Business Services, LLC ("DEF" or the "Company") and serve as its Managing Director of Major Projects Sourcing in the Supply Chain department. I am over the age of 18 years old and I have been authorized by DEF to give this affidavit in the above-styled proceeding on Duke Energy Florida, Inc.'s ("DEF" or the "Company") behalf and in support of DEF's Sixth Request for Confidential Classification regarding portions of the Florida Public Service Commission Staff-Generated Financial Auditors' Workpapers (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. As Managing Director of Major Projects, my role includes providing management oversight in the disposition of the Crystal River Unit 3 ("CR3") Extended Power Uprate ("EPU") assets by ensuring that Supply Chain employees at CR3 follow DEF's processes and procedures. I also have responsibility for the Supply Chain functions for Duke Energy International and with most Duke Energy Corporation ("Duke Energy") Major Projects, both regulated and non-regulated.

3. DEF is seeking confidential classification for portions of the Florida Public Service Commission Staff-Generated financial auditors' Workpapers (the "Workpapers"). These documents contain confidential contractual cost information, asset disposition information and strategies, and vendor invoice and cost information as well as internal labor information. This information is competitively sensitive business information the disclosure of which would impair DEF's competitive business interests. A detailed description of the confidential information at issue is contained in confidential Attachment A to DEF's Request and is outlined in DEF's Justification Matrix that is attached to the Request as Attachment C.

4. The Company is requesting confidential classification of this information because the EPU project portions of the final auditor's Workpapers contain confidential contractual original cost information and settlement numbers concerning the disposition of EPU assets. Additionally, vendor invoice information is included in the Workpapers and if such information was disclosed to DEF's competitors and/or other potential suppliers, DEF's efforts to obtain competitive service that provide economic value to both the Company and its customers could be compromised by the Company's competitors and/or suppliers changing their offers, consumption, or purchasing behavior within the relevant markets.

5. DEF must also be able to assure its existing and future vendors that sensitive business information, such as the pricing terms of their contracts, will be kept confidential. If other third parties were made aware of confidential contractual terms that DEF has with other parties, they may offer less competitive contractual terms in future contractual negotiations.

6. Upon receipt of all this confidential information, 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. At no time since negotiating and receiving the

contracts and performing the analyses in question has the Company publicly disclosed the information or the terms of the documents at issue. The Company has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated this 18th day of June, 2015.

Mark R. Teague
(Signature)
Mark R. Teague

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 18 day of June, 2015 by Mark R. Teague. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.

Deborah G. Thrap
(Signature)

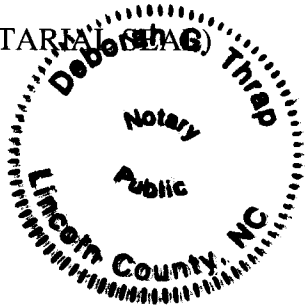
Deborah G. Thrap
(Printed Name)

NOTARY PUBLIC, STATE OF _____

4/25/2017
(Commission Expiration Date)

19970910128
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery Clause

Docket No: 150009-EI

Submitted for Filing: June 24, 2015

AFFIDAVIT OF THOMAS G. FOSTER 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 Thomas G. Foster, who being first duly sworn, on oath deposes and says that:

1. My name is Thomas G. Foster. I am employed by Duke Energy Business Services, LLC in the capacity of Director, Rates and Regulatory Planning. I am over the age of 18 years old and I have been authorized to give this affidavit in the above-styled proceeding on Duke Energy Florida, Inc.'s ("DEF" or the "Company") behalf and in support of DEF's Sixth Request for Confidential Classification. The facts are based upon my personal knowledge.

2. As Director, Rates and Regulatory Planning, I am responsible for regulatory planning and cost recovery for DEF. These responsibilities include regulatory financial reports and analysis of state, federal, and local regulations and their impact on DEF. In this capacity, I am also responsible for the Levy Nuclear Project ("LNP") and the Crystal River Unit 3 ("CR3") Extended Power Uprate ("EPU") Project ("EPU") Cost Recovery filings, made as part of this docket, in accordance with Rule 25-6.0423, Florida Administrative Code ("F.A.C.").

3. DEF is seeking confidential classification for portions of the Florida Public Service Commission Staff's ("Staff") financial Auditors' Workpapers (the "Workpapers"). These documents contain confidential contractual cost information, asset disposition information and strategies, and vendor invoice and cost information as well as internal labor information.


This information is competitively sensitive business information the disclosure of which would

impair DEF's competitive business interests. A detailed description of the confidential information at issue is contained in confidential Attachment A to DEF's Request and is outlined in DEF's Justification Matrix that is attached to the Request as Attachment C.

4. The Company is requesting confidential classification of this information because the Workpapers contain proprietary and confidential financial information that would impair DEF's competitive business interests if publicly disclosed, including internal business operations information. Specifically, portions of these documents contain internal labor cost information and invoices for DEF that qualifies as proprietary, confidential business operations information.

5. Upon receipt or creation of all of this confidential information strict procedures are established and followed to maintain the confidentiality of the documents and information, including restricting access to those persons who need the information to assist the Company's business operations. At no time has the Company publicly disclosed the information. The Company has treated and continues to treat the information at issue as confidential.

6. This concludes my affidavit.



(Signature)
Thomas G. Foster

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 23 day of June, 2015 by Thomas G. Foster. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



(Signature)
Sarah Hirschman Libes

(Printed Name)
NOTARY PUBLIC, STATE OF Florida

3/23/2018
(Commission Expiration Date)

FF 105231
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)



Sarah Hirschman Libes
NOTARY PUBLIC
STATE OF FLORIDA
Comm# FF105231
Expires 3/23/2018