



Dianne M. Triplett
ASSOCIATE GENERAL COUNSEL
Duke Energy Florida, Inc.

July 9, 2015

VIA ELECTRONIC DELIVERY

Ms. Carlotta Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket 150148-EI
Duke Energy Florida, Inc.'s Third Request for Confidential Classification

Dear Ms. Stauffer:

Attached is Duke Energy Florida, Inc.'s ("DEF") Third Request for Confidential Classification of certain information provided in DEF's Response to OPC's First Set of Interrogatories (Nos. 1-20) in the above-referenced matter. This filing includes:

- Exhibit A (confidential slipsheet only)
- Exhibit B (redacted information)
- Exhibit C (justification matrix)
- Exhibit D (Affidavit of Mark Teague)

DEF's confidential Exhibit A that accompany the above-referenced filing, has been submitted under separate cover.

Thank you for your assistance in this matter. Please feel free to call me at (727) 820-4692 should you have any questions concerning this filing.

Respectfully,

/s/ Dianne M. Triplett

Dianne M. Triplett
Associate General Counsel

DMT/at
Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Duke Energy Florida, Inc.
For Approval to Include In Base Rates the Revenue
Requirement for the CR3 Regulatory Asset

Docket No. 150148-EI

Submitted for Filing
July 9, 2015

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

Duke Energy Florida, Inc. (“DEF” or the “Company”), pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), submits this Third Request for Confidential Classification concerning portions of DEF’s Response to OPC’s First Set of Interrogatories filed in this docket on June 18, 2015. DEF previously filed a Notice of Intent to request confidential classification. In support of this request, DEF states:

1. As further explained below, portions of attachments provided in DEF’s Response to Question Nos. 10c and 14 contain “proprietary confidential business information” under section 366.093(3), F.S.

2. The following exhibits are included with this request:

(a) Sealed Composite Exhibit A is a package containing an unredacted copy of all the documents for which DEF seeks confidential treatment. Composite Exhibit A is being submitted separately in a sealed envelope labeled “CONFIDENTIAL.” In the unredacted version, the information asserted to be confidential is highlighted in yellow.

(b) Composite Exhibit B is a package containing two copies of redacted versions of the documents for which the Company requests confidential classification. The specific

information for which confidential treatment is requested has been blocked out by opaque marker or other means.

(c) Exhibit C is a table which identifies by page and line the information for which DEF seeks confidential classification and the specific statutory bases for seeking confidential treatment.

(d) Exhibit D is an affidavit attesting to the confidential nature of information identified in this request.

3. As indicated in Exhibit C, the information for which DEF requests confidential classification is “proprietary confidential business information” within the meaning of Section 366.093(3), F.S. Specifically, the information at issue relates to sale of Crystal River Nuclear Unit 3 (“CR3”) assets, specifically, the names of companies purchasing CR3 nuclear components and equipment, the disclosure of which would impair the efforts of the Company to negotiate the disposition of CR3 assets on favorable terms. *See* § 366.093(3)(d), F.S.; Affidavit of Mark Teague at ¶ 6.

4. Furthermore, the information at issue relates to the competitive contractual business interests of the parties purchasing DEF’s CR3 assets, the disclosure of which would impair their competitive businesses. § 366.093(3)(e), F.S.; Affidavit of Mark Teague at ¶ 5. Accordingly, such information constitutes “proprietary confidential business information” which is exempt from disclosure under the Public Records Act pursuant to Section 366.093(1), F.S.

5. The information identified as Exhibit “A” is intended to be and is treated as

confidential by the Company. *See* Affidavit of Mark Teague at ¶ 4. The information has not been disclosed to the public, and the Company has treated and continues to treat the contract at issue as confidential. *See* Affidavit of Mark Teague at ¶ 7.

6. DEF requests that the information identified in Exhibit A be classified as “proprietary confidential business information” within the meaning of section 366.093(3), F.S., that the information remain confidential for a period of at least 18 months as provided in section 366.093(4) F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business..

WHEREFORE, for the foregoing reasons, DEF respectfully requests that this Third Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 9th day of July, 2015.

MATTHEW R. BERNIER
Senior Counsel
Duke Energy Florida, Inc.
106 East College Avenue
Suite 800
Tallahassee, FL 32301
Telephone: (850) 521-1428

/s/ Dianne M. Triplett

DIANNE M. TRIPLETT
Associate General Counsel
Duke Energy Florida, Inc.
299 First Avenue North
St. Petersburg, FL 33701
Telephone: (727) 820-4692

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to the following this 9th day of July, 2015.

/s/ Dianne M. Triplett

Attorney

<p>Keino Young Kelley Corbari Leslie Ames Theresa Tan Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 kyoung@psc.state.fl.us kcorbari@psc.state.fl.us lames@psc.state.fl.us ltan@psc.state.fl.us</p>	<p>Charles Rehwinkel J. R. Kelley Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, Florida 32399-1400 kelly.jr@leg.state.fl.us rehwinkel.charles@leg.state.fl.us</p>
<p>Florida Industrial Power Users Group c/o Moyle Law Firm, P.A. Jon C. Moyle, Jr. Karen A. Putnal 118 North Gadsden Street Tallahassee, Florida 32301 jmoyle@moylelaw.com kputnal@moylelaw.com</p>	<p>PSC Phosphate – White Springs c/o James W. Brew Owen J. Kopon Stone Mattheis Xenopoulos & Brew, PC 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007-5201 jbrew@smxblaw.com ojk@smxblaw.com</p>

Exhibit A

CONFIDENTIAL
FILED UNDER SEPARATE COVER

Exhibit B

REDACTED

CLASSIFICATION	ITEM DESCRIPTION	QTY	SOLD TO:	SALE TYPE	TOTAL PROCEEDS
Inv - 154	CR3 Auction			Non-Duke	\$ 1,165,712.53
Inv - 154	33033H38 (2 Boxes)	1		Rapid	\$ 850,000.00
Inv - 154	COVER, ,, RCP W/H/E (1 Box)	1		Rapid	\$ 850,000.00
Inv - 154	Bid Event No. 41539 - Tranche 1 Lot 7 - Cable & Wire			Non-Duke	\$ 160,572.00
Inv - 154	RT21-K05134	5		Rapid	\$ 145,000.00
Inv - 154	INCREASER, ,, RIGHT ANGLE DRIVE GEAR BOX, FOR RADIATOR FAN DRIVE	1		Rapid	\$ 121,486.97
Inv - 154	Florida Duke Internal Inventory Transfers			FL Internal	\$ 118,458.94
Inv - 154	VALVE, ,, REACTOR VESSEL INTERNALS VENT, 14"	1		AAT	\$ 110,491.52
Inv - 154	Florida Duke Internal Inventory Transfers			FL Internal	\$ 92,702.49
Inv - 154	LEFM Parts			AAT	\$ 65,846.99
Inv - 154	ACID, BORIC, OPTIBOR SQ GRANULAR, 25 LBS BAG (55.1 LB NET)	520		Rapid	\$ 65,520.00
Inv - 154	Decade Match List Items	30		AAT	\$ 57,347.39
Inv - 154	CHAMBER (DETECTOR)	1		Rapid	\$ 55,000.00
Inv - 154	TYPE RH IM 3, 2.0 SF, 8.3A FL, S1A LR, 80 FT-LB START,	1		Rapid	\$ 51,500.00
Inv - 154	ARC, ,, CHUTE ASSY 5H1350	2		Rapid	\$ 46,000.00
Inv - 154	Bid Event No. 41040 - Removal of large scrap components			Non-Duke	\$ 44,495.40
Inv - 154	Structural steel and piping components			Non-Duke	\$ 32,500.00
Inv - 154	F316, S/S	1		Rapid	\$ 31,000.00
Inv - 154	VALVE, SERVO, MOODS SERVO 73-323	8		Rapid	\$ 30,450.88
Inv - 154	McGuire Match List Items			AAT	\$ 30,180.58
Inv - 154	Catawba Nuclear - Match List Items	34		AAT	\$ 29,805.38
Inv - 154	ANALYZER, ,, HYDROGEN/OXYGEN, VERSION 26 03 2004 OR NEWER	1		Rapid	\$ 28,689.00
Inv - 154	FUEL, DIESEL, CG, LOW OR ULTRA LOW SULFUR ONLY, PER ASTM D975-03, GRADE NO. 2D, ,	27,115		Non-Duke	\$ 27,782.30
Inv - 154	DEC, ,, GVMR T/T 06-2 ITM751	1		Rapid	\$ 27,000.00
Inv - 154	Turbine diesel			Non-Duke	\$ 25,963.20
Inv - 154	Turbine Lube Oil			Disposal	\$ 25,208.10
Inv - 154	EXTENSION, MANIFOLD, EXHAUST, NEW STYLE SHORT TYPE, FOR DIESEL ENGINE MODEL	3		Rapid	\$ 24,000.00
Inv - 154	TRANSDUCER, ,, PLESHROD ASSEMBLY	6		Rapid	\$ 23,550.00
Inv - 154	Florida Duke Internal Inventory Transfers			FL Internal	\$ 22,537.26
Inv - 154	Best and SJJ transformer oil			Non-Duke	\$ 21,457.80
Inv - 154	CONNECTION FITTING, 0-125 TO 0-750 IN H2O, 4-20MA OUTPUT SIGNAL	1		Rapid	\$ 20,875.00
Inv - 154	Bid Event No. 4111M Pump assembly centrifugal pump (CAPITAL)	1		Non-Duke	\$ 20,050.00
Inv - 154	FLANGED ENDS, 1.3125" DIA. BORE, REPAIR AND RETURN WORK SCOPE:	1		AAT	\$ 19,568.87
Inv - 154	FLANGED ENDS, 1.3125" DIA. BORE, REPAIR AND RETURN WORK SCOPE:	1		AAT	\$ 19,568.87
Inv - 154	KIT, ,, CONTROLLER REPAIR, FOR TARGET ROCK MODEL NUMBER 825-001	1		Rapid	\$ 19,009.50
Inv - 154	125VDC, 5 N.O., 5 N.C.	4		Rapid	\$ 18,640.00
Inv - 154	Parts transferred during outage (R218) to RHP			AAT	\$ 17,393.67
Inv - 154	Obsolete Items - Safety Related			AAT	\$ 15,555.50
Inv - 154	Obsolete Items			AAT	\$ 13,390.52
Inv - 154	FR700 MEDIUM, 34 GA. AISI 409 STAINLESS STEEL FRAME, NEOPRENE	40		Rapid	\$ 13,000.00
Inv - 154	Bid Event No. 41567 - T1 Lot 3 Relief Valves			Non-Duke	\$ 12,917.00
Inv - 154	Florida Duke Internal Inventory Transfers			FL Internal	\$ 11,142.18
Inv - 154	Bid Event No. 41566 - Tranche 1 Lot 1 - Large Bore Valves			Non-Duke	\$ 10,965.00
Inv - 154	C Diesel Parts (42225740)	1		Rapid	\$ 10,871.94
Inv - 154	Florida Duke Internal Inventory Transfers			FL Internal	\$ 10,510.22
Inv - 154	Guard Assembly (42225847)	1		Rapid	\$ 10,507.73
Inv - 154	BOARD, ,, SIGNAL CONDITIONING FOR SAS (NEW DESIGN)	3		Rapid	\$ 10,500.00
Inv - 154	PUMP, ,, OIL, FACTORY SET AT 2000 PSIG AND 20 GPM;	2		AAT	\$ 10,416.66

DETAIL REPRESENTS GROSS SALES PRIOR TO JOINT OWNER IMPACTS AND RETAIL JURISDICTION RATES

ITEM DESCRIPTION	SOLD TO	PROCEEDS
CR3 Auction	[REDACTED]	\$ 1,165,712.53
ELEMENT, .., ROTATING, COMPLETE, COMPATIBLE WITH BJ PUMP TYPE DFSS, SIZE 33X33X38 (2 Boxes)	[REDACTED]	\$ 850,000.00
COVER, .., RCP W/HE (1 Box)	[REDACTED]	\$ 850,000.00
Aluminum-Bronze/ Stainless Components	[REDACTED]	\$ 517,414.12
Hale Pump	[REDACTED]	\$ 305,913.00
Duramats & Locking Pins		\$ 186,130.15
CR3 Auction		\$ 183,615.00
Misc Items Transferred from MTF		\$ 167,495.94
Bid Event No. 41533 - Tranche 1 Lot 7 - Cable & Wire SPRING, RELIEF VALVE, ASSEMBLY, FOR MAIN STEAM SAFETY VALVE TYPE 3707RAX1-RT21-XOS134		\$ 145,000.00
RV Tools		\$ 129,423.00
INCREASER, .., RIGHT ANGLE DRIVE GEAR BOX, FOR RADIATOR FAN DRIVE		\$ 121,486.97
Florida Duke Internal Inventory Transfers		\$ 118,458.94
(7) Hach oxygen Analyzers, (1) Hach Silica Analyzer, (1) Hach Silica Analyzer, (1) Hach Anatel 1000 TOC, (1) Hach hydrazine Analyzer		\$ 113,864.57
VALVE, .., REACTOR VESSEL INTERNALS VENT, 14"		\$ 110,491.52
Hose Trailer, Baldor Generator, Baldor Dodge, High volume Fans, LED lights, Cord Reels		\$ 107,544.00
Florida Duke Internal Inventory Transfers		\$ 92,702.49
Scrap Metal		\$ 74,948.86
LEFM Parts		\$ 65,846.99
ACID, BORIC, OPTIBOR SQ GRANULAR, 25 KG BAG (55.1 LB NET)		\$ 65,520.00
(8) Sodium analyzers, (1) Sequencer		\$ 65,084.35
Nash Vacuum Pump		\$ 63,300.00
MOTOR, LIMITORQUE, 100FT-LB, 3PH, 460V, 60HZ, 3600(SYNC), 3490(RATED), 256TY FRAME, 13.2HP, SB/SMB-3, ALUMINUM ROTOR		\$ 63,080.00
MCE/Emax Computer		\$ 61,062.31
CJC oil filtration Cooling Skids & Mobile Filter Systems		\$ 60,841.00
CR3 Auction		\$ 59,000.00
Oconee Match List Items		\$ 57,247.39
Turbine Vibration Monitoring Equipment & Cabinet		\$ 57,054.20

**DUKE ENERGY FLORIDA – EXHIBIT C - Docket 150148-EI
Confidentiality Justification**

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
<p>DEF Response to OPC’s 1st Set of Interrogatories, Question #10c</p>	<p>Bates number 150148-OPCROG1-10c-000001, all companies in the “sold to” column (column 4) of the table</p>	<p>§366.093(3)(d), F.S. The document in question contains confidential 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), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>DEF Response to OPC’s 1st Set of Interrogatories, Question #14</p>	<p>Bates number 150148-OPCROG1-14-000001, all companies in the “sold to” column (column 2) of the table</p>	<p>§366.093(3)(d), F.S. The document in question contains confidential 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), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

Exhibit D

AFFIDAVIT OF MARK TEAGUE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Duke Energy Florida, Inc.
For Approval to Include In Base Rates the Revenue
Requirement for the CR3 Regulatory Asset

Docket No. 150148-EI

Submitted for Filing
July 9, 2015

**AFFIDAVIT OF MARK TEAGUE IN SUPPORT OF
DUKE ENERGY FLORIDA'S
THIRD REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Mark Teague. 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 Third Request for Confidential Classification. The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Managing Director of Major Projects Sourcing in the Supply Chain Department. This section is responsible for Supply Chain functions for Duke

Energy International and with most Duke Energy Corporation Major Projects, both regulated and non-regulated.

3. As the Managing Director of Major Projects Sourcing, I am responsible, along with the other members of the section, for overseeing the disposition of the Crystal River Nuclear Unit 3 (“CR3”) assets by ensuring that Supply Chain employees at CR3 follow DEF’s processes and procedures.

4. DEF is seeking confidential classification for portions of DEF’s Response to OPC’s First Set of Interrogatories (specifically questions #10c and 14). The confidential information at issue is contained in confidential Exhibit A to DEF’s Third Request for Confidential Classification and is outlined in DEF’s Justification Matrix that is attached to DEF’s Third Request for Confidential Classification as Exhibit C. DEF is requesting confidential classification of this information because it contains sensitive business information, the disclosure of which would impair the Company’s efforts to contract for goods and services on favorable terms.

5. Two attachments to DEF’s Response to OPC’s 1st Set of Interrogatories, Questions #10c and #14 (specifically Bates Numbers 150148-OPCROG1-10c-000001 and 150148-OPCROG1-14-000001), contain the names of companies purchasing various CR3 plant assets. DEF retained an experienced auction service to competitively seek an aggressive marketplace and reach a broader (worldwide) market to obtain the highest bidding price for the CR3 saleable assets that in turn, provides economic value to DEF and its customers. In order to achieve the best sale price for these assets, however, DEF must be able to assure these buyers that sensitive business information, such as the purchase price and type of inventory purchased, will be kept confidential. With respect

to the information at issue in this request, DEF has kept confidential and has not publicly disclosed confidential purchasing information. Absent such measures, purchasing companies would run the risk that sensitive business information, such as the type of equipment or nuclear components purchased, would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, bidding companies who otherwise would bid on DEF's available inventory, might decide not to do so if DEF did not keep their purchasing information confidential. Without DEF's measures to maintain the confidentiality of sensitive bid information between DEF and the bidding company, the Company's efforts to obtain competitive prices for its CR3 nuclear assets could be undermined.

6. Additionally, the disclosure of confidential bidding companies could adversely impact DEF's competitive business interests. If such information were disclosed to DEF's competitors, DEF's efforts to obtain competitive prices for the assets that provide economic value to both DEF and its customers could be compromised by DEF's competitors changing their position or purchasing behavior within the relevant markets. Specifically, if DEF's competitors are aware of the names of bidding companies, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition of the nuclear equipment and inventory. For example, DEF's competitors who could also have nuclear inventory for sale, may adjust their behavior in the market place by offering their nuclear inventory or equipment on more favorable price terms, and thus, DEF could potentially lose the sale.

7. Upon receipt of confidential information from bidding companies, 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 receiving the contracts and information in question has the Company publicly disclosed that information or contracts. The Company has treated and continues to treat the information and contracts at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 7th day of July, 2015.

Mark Teague
(Signature)

Mark Teague
Managing Director of Major Projects Sourcing
Supply Chain Department
Duke Energy Business Services, LLC
400 South Tryon Street
Charlotte, NC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 7th day of July, 2015 by Mark 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)

