



Matthew R. Bernier  
Senior Counsel  
Duke Energy Florida, Inc.

July 15, 2015

**VIA ELECTRONIC FILING**

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

Re: *Review of Duke Energy Florida, Inc.'s Data Accuracy in Electric Reliability Report;  
Undocketed*

Dear Ms. Stauffer:

Please find enclosed for filing on behalf of Duke Energy Florida, Inc. ("DEF"), DEF's Request for Confidential Classification filed in connection with the Review of Duke Energy Florida, Inc.'s Data Accuracy in Electric Reliability Report, Audit No. PA-15-01-003. The filing includes:

- DEF's Request for Confidential Classification;
- Slipsheet for confidential Exhibit A;
- Redacted Exhibit B (two copies);
- Exhibit C (justification matrix); and
- Exhibit D (affidavit of Randall Miranda).

DEF's confidential Exhibit A for 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 (850) 521-1428 should you have any questions concerning this filing.

Respectfully,

*s/Matthew R. Bernier*

Matthew R. Bernier  
Senior Counsel

MRB/mw  
Enclosures  
cc: Certificate of Service

**Duke Energy Florida, Inc.**  
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 15<sup>th</sup> day of July, 2015 as indicated below.

*s/Matthew R. Bernier*  
Attorney

Sofi Delgado Perusquia  
Office of Auditing and Performance Analysis  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[SDelgado@psc.state.fl.us](mailto:SDelgado@psc.state.fl.us)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Review of Duke Energy Florida,  
Inc.'s Data Accuracy in Electric Reliability  
Reporting

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Docket No. 150000

Dated: July 15, 2015

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

Duke Energy Florida, Inc., (“DEF” or “Company”), pursuant to Section 366.093, Florida Statutes (“F.S.”) and Rule 25-22.006, Florida Administrative Code (“F.A.C.”), submits this Request for Confidential Classification of certain information contained in Staff’s audit workpapers PA-15-01-003 pertaining to its Review of DEF’s Data Accuracy in Electric Reliability Reporting. In support of this Request, DEF states:

1. The Staff audit workpapers at issue contain “proprietary confidential business information” under Section 366.093(3), Florida Statutes.

2. The following exhibits are included with this request:

(a) Sealed Composite Exhibit A is a package containing all of the audit workpapers 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 basis 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 audit workpapers contain DEF’s internal processes and procedures which if disclosed, could affect the company’s ability to accurately report reliability issues and impair the interests of both DEF and its customers. *See* § 366.093(3)(b), F.S.; Affidavit of Randall Miranda at ¶ 5. Furthermore, the information at issue contains employee personnel information, the disclosure of which could impair the Company’s efforts to protect internal business interests. *See* § 366.093(3)(f), F.S.; Affidavit of Randall Miranda 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.

4. The information identified as Exhibit “A” is intended to be and is treated as confidential by the Company. *See* Affidavit of Randall Miranda at ¶ 6. The information has not been disclosed to the public, and the Company has treated and continues to treat its internal audit processes as confidential. *See* Affidavit of Randall Miranda at ¶ 6.

5. 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 Request for Confidential Classification be granted.

Respectfully submitted this 15<sup>th</sup> day of July, 2015.

*s/Matthew R. Bernier*

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[Matthew.Bernier@Duke-Energy.com](mailto:Matthew.Bernier@Duke-Energy.com)

Attorneys for  
DUKE ENERGY FLORIDA, INC.

**Duke Energy Florida, Inc.**  
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[SDelgado@psc.state.fl.us](mailto:SDelgado@psc.state.fl.us)

# **Exhibit A**

**“CONFIDENTIAL”**

**(filed under separate cover)**


# **Exhibit B**

**REDACTED**



# REDACTED

Information Technology	Grid Solutions Reporting	Power Quality, Reliability & Integrity Governance
Ralph Nelson Mgr. Customer & Energy Del Solns	Gary Crook Mgr. Grid Solutions Reporting	Bob Dollar Dir. PQR&I Governance



- DR1.24 a. Please provide a list of all reliability indices the company tracks and reports to the Florida Public Service Commission.
- b. Please provide a list, definitions, and calculation methodologies of all reliability indices the company tracks and reports internally.

**RESPONSE:**

- a. DEF provides SAIDI, SAIFI, CAIDI, MAIFI, CEMI5 and LBAR to the Florida Public Service Commission. All are calculated utilizing the FPSC method.
- b. See the attached document on CD titled “Reliability Performance Indices Definitions.pdf”

- DR1.25 Please provide a list, description, and any applicable flowcharts of all systems and databases the company uses to track all service reliability indices.

**RESPONSE:**

See the attached confidential document on CD titled “Florida\_Outage\_Reporting.pdf”.

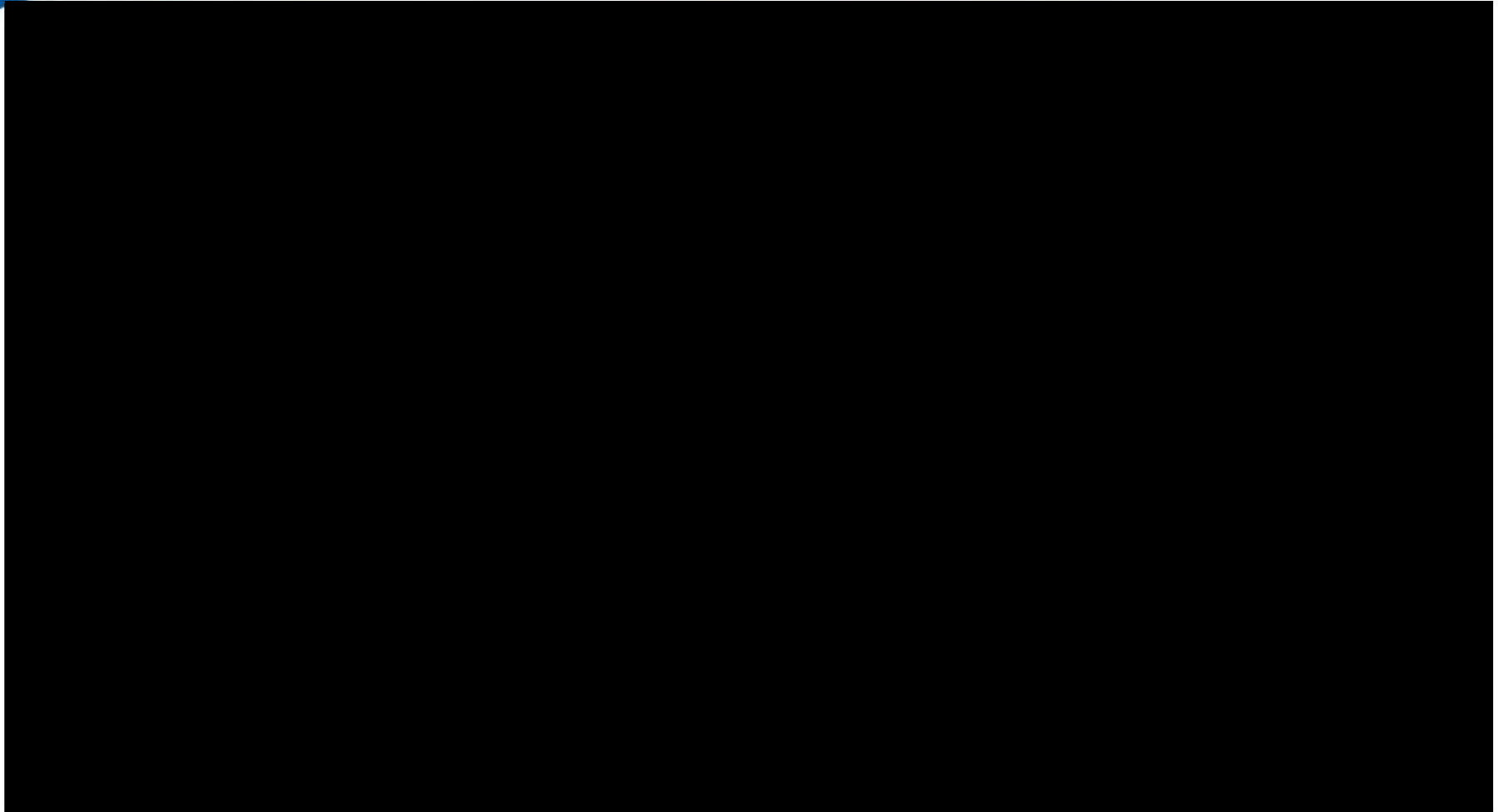
- DR1.26 Please provide a list, description, and examples of all management reports used to evaluate the databases and systems used to capture the company’s service reliability indices.

**RESPONSE:**

- All aspects of the process are self-monitored with IT enterprise applications

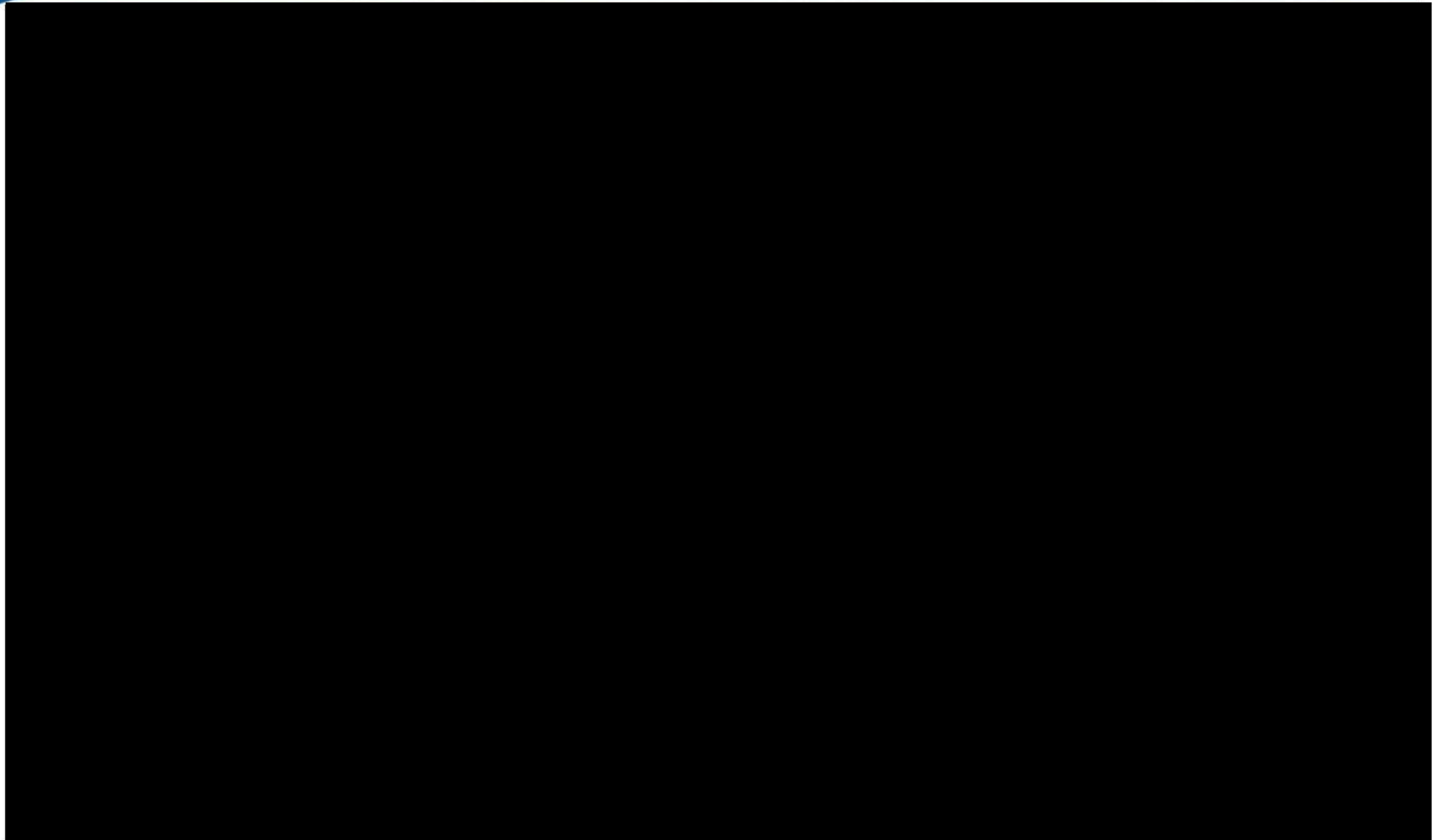
**REDACTED**

## Outage Life Cycle Overview



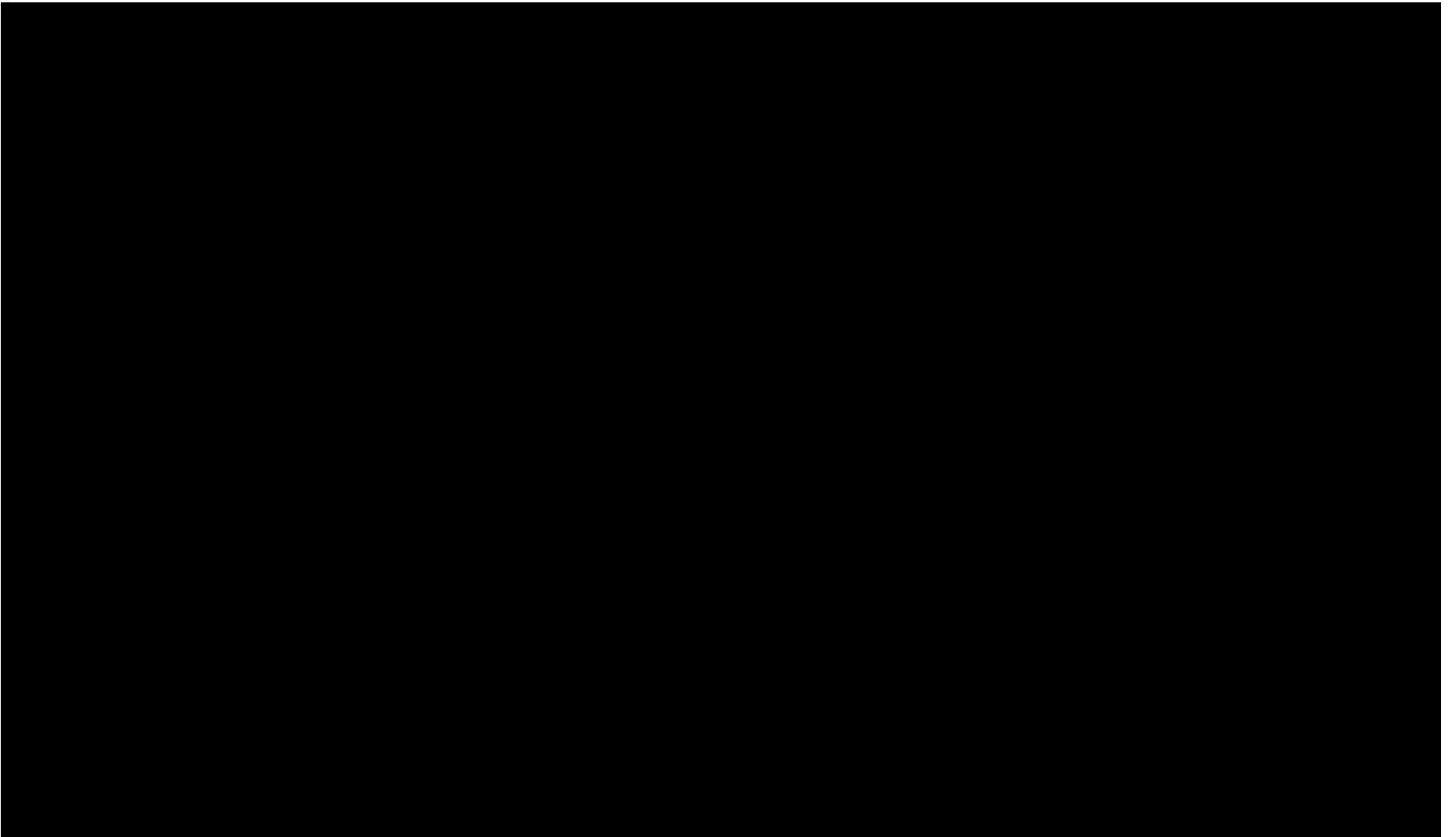
**REDACTED**

## Outage Life Cycle Overview



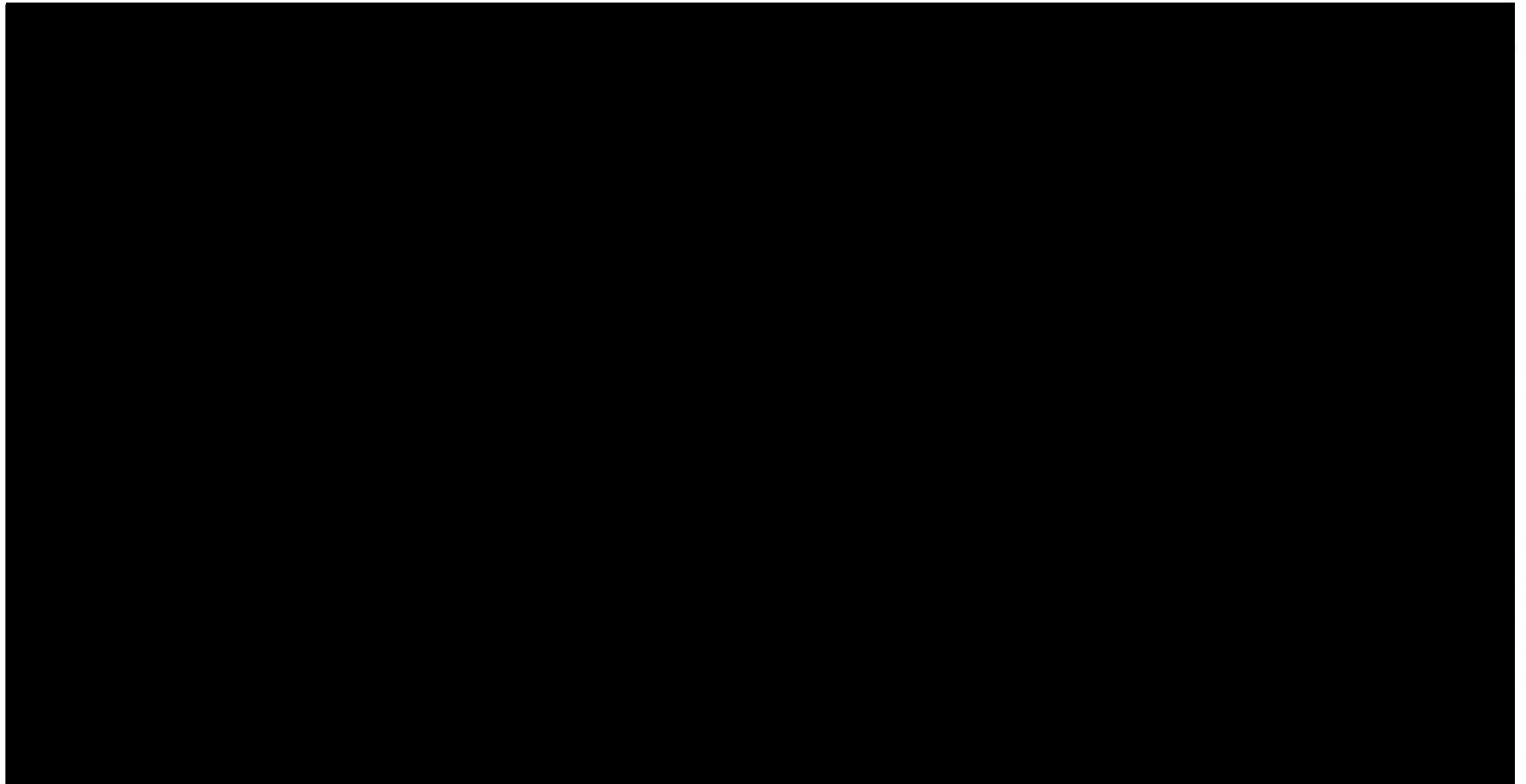
**REDACTED**

## Outage Life Cycle Overview




**REDACTED**

## Outage Life Cycle Overview



# REDACTED

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Ralph Nelson Mgr. Customer & Energy Del Solns	Gary Crook Mgr. Grid Solutions Reporting	Bob Dollar Dir. PQR&I Governance



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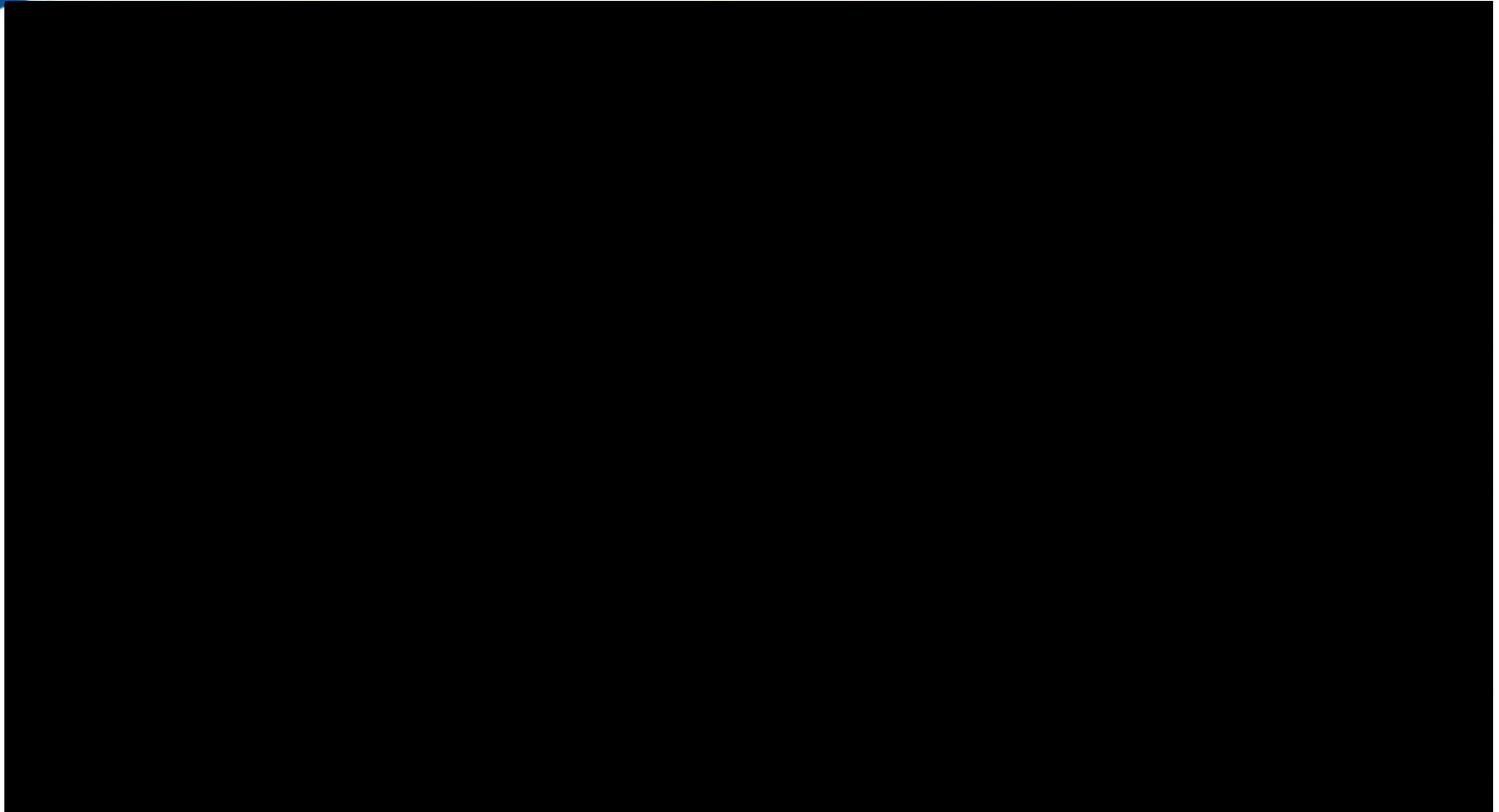
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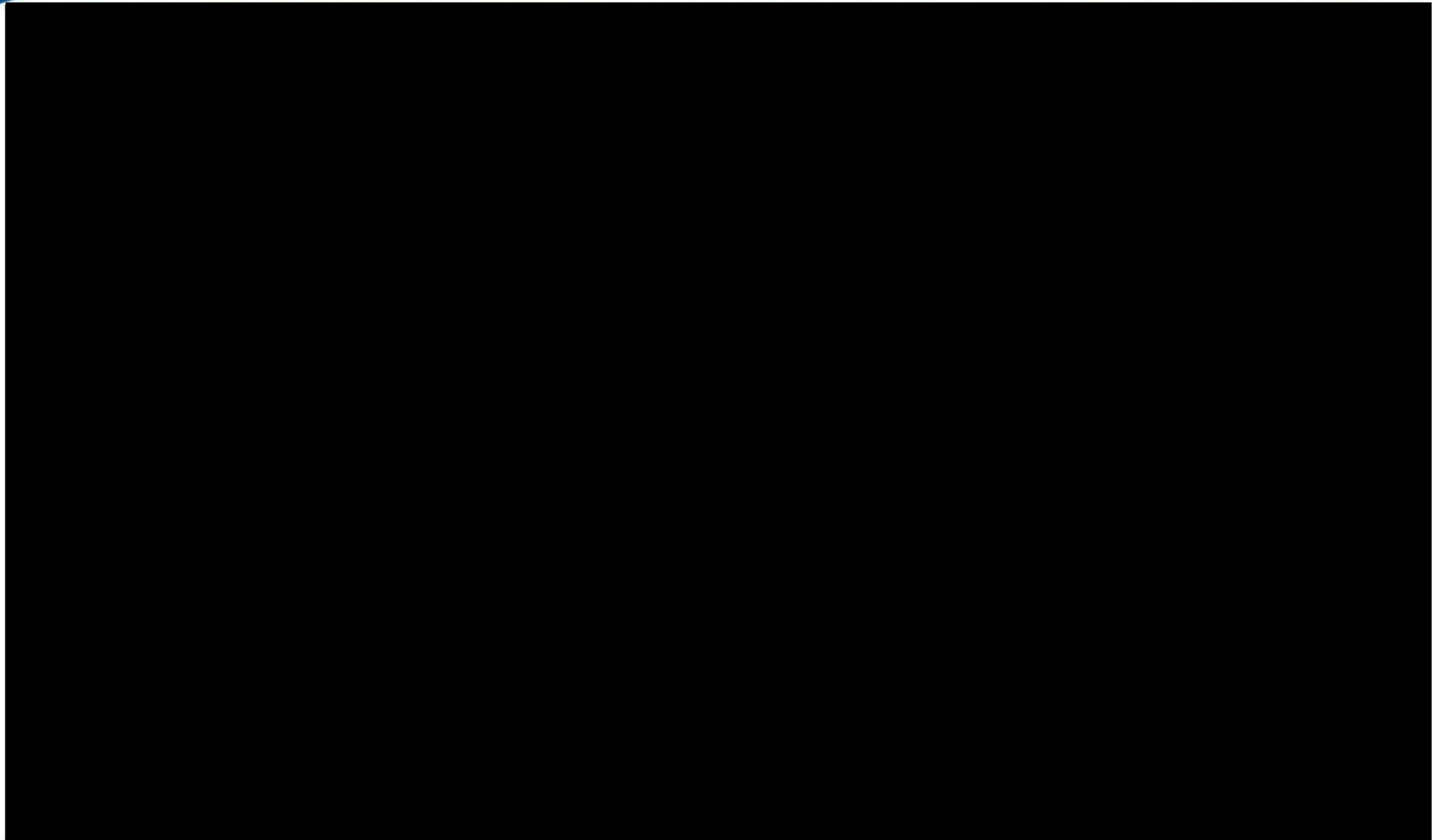
**REDACTED**

## Outage Life Cycle Overview



**REDACTED**

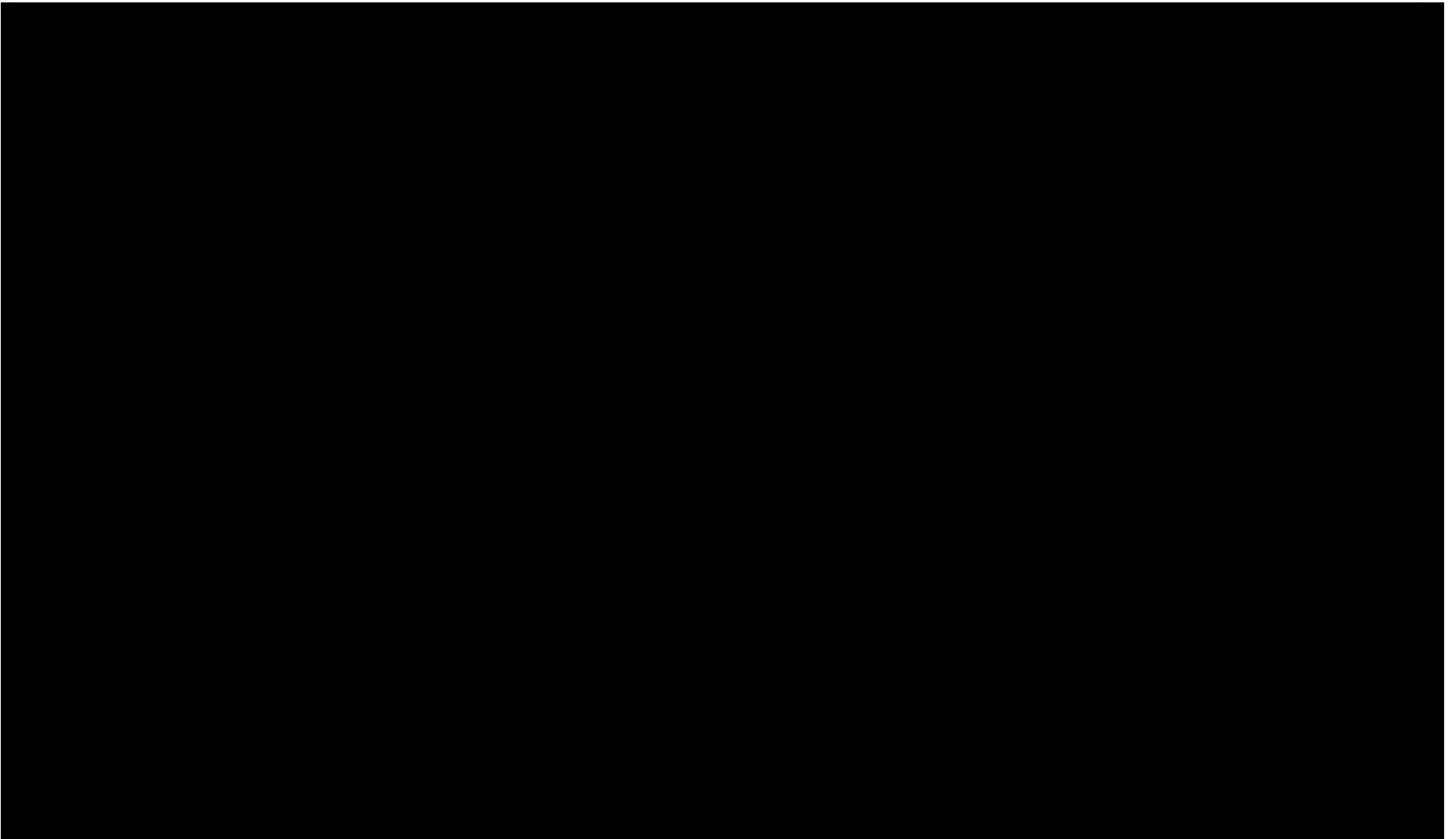
## Outage Life Cycle Overview





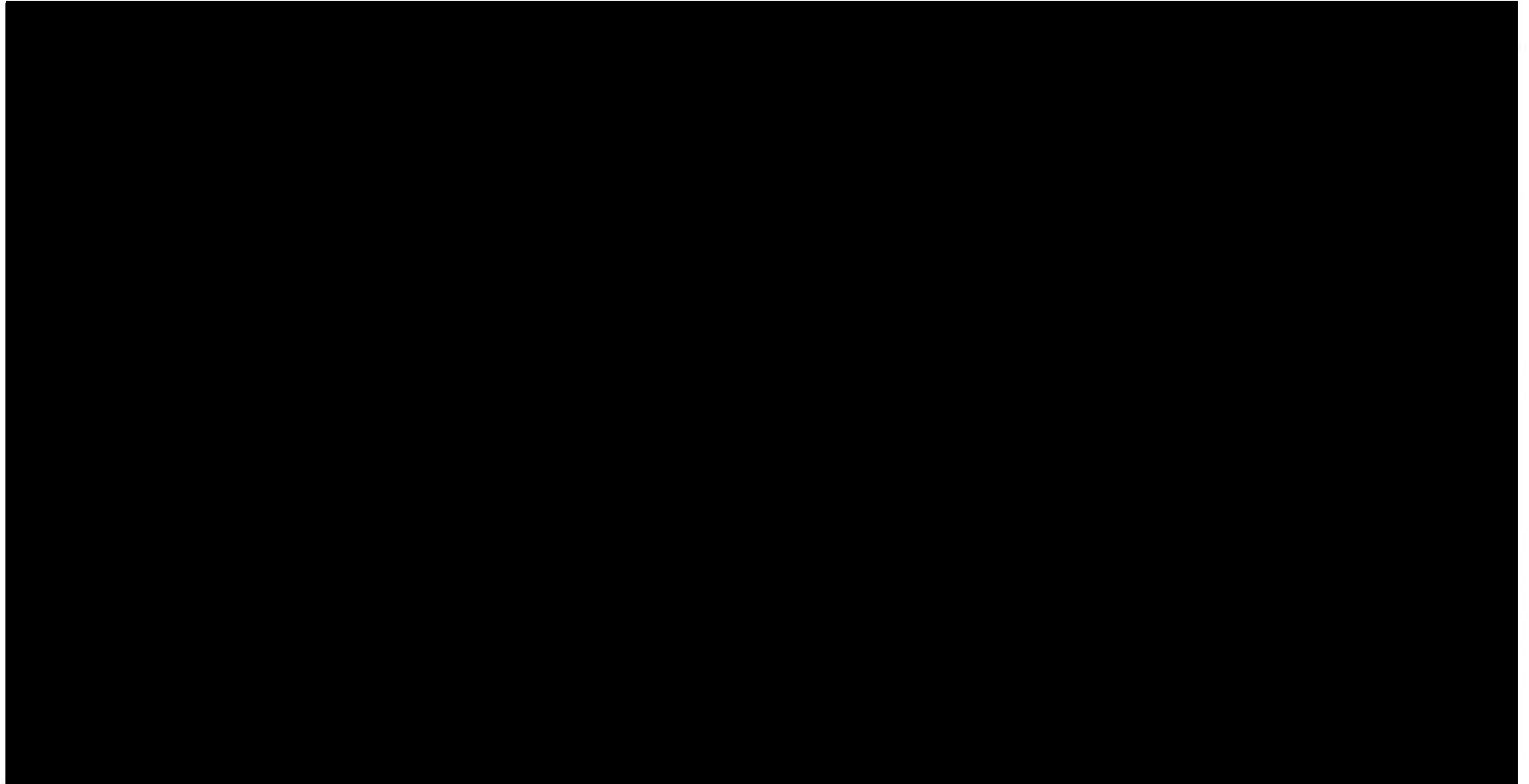
**REDACTED**

## Outage Life Cycle Overview



**REDACTED**

## Outage Life Cycle Overview



## Exhibit C

### DUKE ENERGY FLORIDA Confidentiality Justification Matrix

<b>DOCUMENT/RESPONSES</b>	<b>PAGE/LINE</b>	<b>JUSTIFICATION</b>
Staff's Audit Workpapers PA-15-01-003	Pages 178, 181, 186, &188 DEF's Life Cycle Overview-entire document.	§366.093(3)(b), F.S. The document in question contains confidential information relating to internal auditing procedures, controls and reports of internal auditors, the disclosure of which would impair the Company's efforts to protect internal business information.
<b>DOCUMENT/RESPONSES</b>	<b>PAGE/LINE</b>	<b>JUSTIFICATION</b>
DEF's Response to Audit Data Request 1 Question 1.23 and Page 122 of Staff's Audit Workpapers PA- 15- 01-003	Pages 122: Second tier personnel information	§366.093(3)(f), F.S. The document in question contains employee personnel information unrelated to compensation, duties, qualifications, ore responsibilities, the disclosure of which could impair the Company's efforts to protect internal business information.

**Exhibit D**  
**AFFIDAVIT OF**  
**RANDALL MIRANDA**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

---

In re: Review of Duke Energy Florida,  
Inc.'s Data Accuracy in Electric Reliability  
Reporting.

---

Docket No. 150000

Dated: July 15, 2015

**AFFIDAVIT OF RANDALL MIRANDA IN SUPPORT OF  
DUKE ENERGY FLORIDA'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Randall Miranda. 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 "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Manager of PQR & I Engineering in the PQR & I Planning Department. This section is responsible for the capacity planning, power quality, reliability and integrity of the distribution system for DEF.

3. As the Manager of PQR & I Engineering, I am responsible, along with the other members of the section, for the management of the distribution assets, the planning

and execution of the annual Distribution investment plan, and the compilation of the annual distribution service reliability report for DEF.

4. DEF is seeking confidential classification for certain information contained in Staff's Audit workpapers pertaining to the Review of DEF's Data Accuracy in Electric Reliability Reporting (Control No. PA-15-01-003), specifically included on pages 122, 178, 181, 186, and 188. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Justification Matrix that is attached to DEF's Request 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 protect internal business information.

5. DEF has established and maintains internal audit processes and procedures for its reliability reporting. DEF must ensure that sensitive business information, such as personnel information and internal auditing processes and procedures, will be kept confidential. The disclosure of DEF's internal processes and procedures could adversely impact DEF's ability to control, audit, and evaluate reliability issues. DEF has kept confidential and has not publicly disclosed confidential information such as its procedures for measuring and evaluating the lifecycle of a reliability issue and employee personnel information unrelated to compensation, duties, responsibilities, or qualifications, the disclosure of which could impair the Company's efforts to protect its internal business interests.

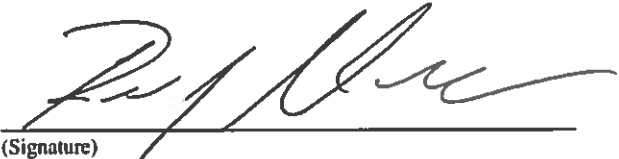
6. Strict procedures are established and followed to maintain the confidentiality of the Company's internal policies and procedures, including restricting

access to those persons who need the information to assist the Company, and restricting the number of, and access to the information. At no time since 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.

7. This concludes my affidavit.

Further affiant sayeth not.

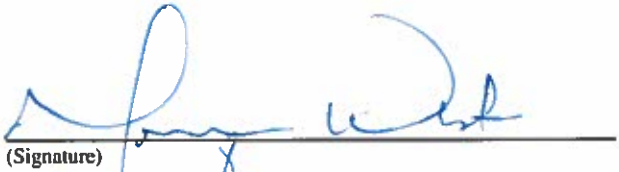
Dated the 15 day of July, 2015.



(Signature)

Randall Miranda  
Manager of PQR & I Engineering  
PQR & I Planning Department  
Duke Energy Florida, Inc.  
Clearwater Operations Center Complex  
2166 Palmetto Street,  
Clearwater, FL 34625

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 15<sup>th</sup> day of July, 2015 by Randall Miranda. He is personally known to me, or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.



(Signature)

Monique West

(Printed Name)

NOTARY PUBLIC, STATE OF \_\_\_\_\_

June 28 2019

(Commission Expiration Date)

\_\_\_\_\_  
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

