

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: NUCLEAR POWER PLANT COST
RECOVERY CLAUSE

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

DUKE ENERGY FLORIDA'S NOTICE OF FILING AFFIDAVITS

Duke Energy Florida, Inc. ("DEF" or the "Company"), hereby gives notice of filing the Affidavits of Christopher M. Fallon and Mark R. Teague in Support of Duke Energy Florida, Inc.'s Request for Extension of Confidential Classification Regarding the Information Covered by its First Request for Confidential Classification in Docket No. 130009-EI.

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 Mail this 24th day of July, 2015.

/s/ Blaise N. Gamba

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery
Clause

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

**AFFIDAVIT OF CHRISTOPHER M. FALLON IN SUPPORT OF DUKE ENERGY
FLORIDA, INC.'S REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION
REGARDING THE INFORMATION COVERED BY ITS FIRST REQUEST FOR
CONFIDENTIAL CLASSIFICATION IN DOCKET 130009-EI**

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 Request for Extension of Confidential Classification regarding portions of the Testimonies and Exhibits filed in Docket No. 130009-EI (Document No. 01092-13). The facts attested to in my affidavit are based upon my personal knowledge.

2. Portions of the testimony and exhibits of Mr. Foster as well as portions of the testimony of Mr. Fallon contain confidential, proprietary business and financial information regarding the contract for equipment, materials, and services for the Levy Nuclear Project ("LNP") and the Crystal River Unit 3 ("CR3") Power Uprate Project ("CR3 Uprate" and collectively with LNP the "Nuclear Projects").

3. DEF is requesting an extension of the confidential classification of portions of the Testimony and Exhibit No. ___ (TGF-1) and Exhibit No. ____ (TGF-2) (collectively the “NFRs”) of Mr. Thomas G. Foster and portions of the testimony of Mr. Christopher M. Fallon because they contain confidential financial information related to the contracts for the Nuclear Projects. Disclosure of these contractual terms and arrangements, including pricing provisions, would harm the Company’s ability to obtain favorable contracts in the future. DEF’s competitors and those third-parties with whom the Company seeks to contract would be able to change their behavior in the relevant markets or their contractual negotiating positions, respectively, to the detriment of DEF and its customers. Additionally, release of this information would violate the contractual confidentiality provisions.

4. Upon receipt of this confidential information, as with all confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided therein. Such procedures include, but are not limited to, restricting access to the documents and information to only those persons who require it to assist the Company. At no time has DEF publicly disclosed the confidential information contained in the contracts as confidential. Nothing has changed since the Commission granted this information confidential classification to render it stale or public information. Accordingly, the confidential treatment of this information should be continued.

5. This concludes my affidavit.

Further affiant sayeth not.

Dated this 23rd day of July, 2015.



(Signature)

Christopher M. Fallon

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 23RD day of July, 2015 by Christopher M. Fallon. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

(Signature)

TERESA D. NEELY

(Printed Name)

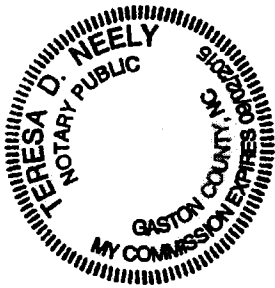
NOTARY PUBLIC, STATE OF NC

09/02/2015

(Commission Expiration Date)

(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: July 24, 2015

**AFFIDAVIT OF MARK R. TEAGUE IN SUPPORT OF DUKE ENERGY
FLORIDA, INC.'S REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION
REGARDING THE INFORMATION COVERED BY ITS FIRST REQUEST FOR
CONFIDENTIAL CLASSIFICATION IN DOCKET 130009-EI**

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 Request for Extension of Confidential Classification regarding portions of the Testimonies and Exhibits filed in Docket 130009-EI (Document No. 01092-13). 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. Portions of the testimony and exhibits of Mr. Foster as well as portions of the testimony of Mr. Fallon contain confidential, proprietary business and financial information regarding the contract for equipment, materials, and services for the Levy Nuclear Project (“LNP”) and the Crystal River Unit 3 (“CR3”) Power Uprate Project (“CR3 Uprate” and collectively with LNP the “Nuclear Projects”).

3. DEF is requesting an extension of the confidential classification of portions of the Testimony and Exhibit No. ____ (TGF-1) and Exhibit No. _____ (TGF-2) (collectively the “NFRs”) of Mr. Thomas G. Foster and portions of the testimony of Mr. Christopher M. Fallon because they contain confidential financial information related to the contracts for the Nuclear Projects. Disclosure of these contractual terms and arrangements, including pricing provisions, would harm the Company’s ability to obtain favorable contracts in the future. DEF’s competitors and those third-parties with whom the Company seeks to contract would be able to change their behavior in the relevant markets or their contractual negotiating positions, respectively, to the detriment of DEF and its customers. Additionally, release of this information would violate the contractual confidentiality provisions.

4. Upon receipt of this confidential information, as with all confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided therein. Such procedures include, but are not limited to, restricting access to the documents and information to only those persons who require it to assist the Company. At no time has DEF publicly disclosed the confidential information contained in the contracts as confidential. Nothing has changed since the Commission granted this

information confidential classification to render it stale or public information. Accordingly, the confidential treatment of this information should be continued.

5. This concludes my affidavit.

Further affiant sayeth not.

Dated this 23rd day of July, 2015.

Mark R. Teague
(Signature)
Mark R. Teague

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 23 day of July, 2015 by Mark R. Teague. He is personally known to me or has produced his N/A driver's license, or his N/A as identification.

Deborah B. Thrap
(Signature)

Deborah B. Thrap
(Printed Name)

NOTARY PUBLIC, STATE OF NC

4/25/17
(Commission Expiration Date)

19970910128
(Serial Number, If Any)

