



Dianne M. Triplett
ASSOCIATE GENERAL COUNSEL

July 7, 2016

VIA ELECTRONIC FILING

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

Re: *Docket Nos. 150148-EI/150171-EI*

Dear Ms. Stauffer:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF"), DEF's Nineteenth Request for Confidential Classification for certain information contained in its Issuance Advice Letter, specifically Exhibit 8-B. This 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 Bryan Buckler)

DEF's confidential Exhibit A that accompanies 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

DMT/mw
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

In re: Petition of Duke Energy Florida, Inc.
For Issuance of a Nuclear Asset Recovery
Financing Order

Docket No. 150171-EI

Dated: July 7, 2016

**DUKE ENERGY FLORIDA, LLC'S NINETEENTH
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida, LLC (“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 its Nineteenth Request for Confidential Classification of Confidential (the “Request”) concerning portions of DEF’s Issuance Advice Letter filed in this docket on June 16, 2016, filed subject to DEF’s concurrently filed Notice of Intent to request confidential classification. In support of this Request, DEF states:

1. Portions of the information contained in DEF’s Issuance Advice Letter, specifically Exhibit 8-B, 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 consists of 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 investor bond-allocation information, the disclosure of which would impair the efforts of the Company or its investors to obtain pricing on favorable terms. *See* § 366.093(3)(d), F.S.; Affidavit of Bryan Buckler at ¶¶ 3-4. Furthermore, the information at issue relates to the competitive interests of DEF and its investors, the disclosure of which would impair their competitive businesses. *See* § 366.093(3)(e), F.S.; Affidavit of Bryan Buckler 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 Bryan Buckler at ¶ 6. The information has not been disclosed to the public, and the Company has treated and continues to treat the information at issue as confidential. *See* Affidavit of Bryan Buckler at ¶ 6. In addition, ordering paragraph 73 of the Commission’s Financing Order in this docket (Order Number PSC-15-0537-FOF-EI) provides that the information that is the subject of this Request be submitted for filing to the Commission “on a confidential basis.”

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 7th day of July, 2016.

s/Dianne M. Triplett

DIANNE M. TRIPLETT
Associate General Counsel
Duke Energy Florida, LLC
299 First Avenue North
St. Petersburg, FL 33701
T: 727.820.4692
F: 727.820.5041
E: Dianne.Triplett@duke-energy.com

MATTHEW R. BERNIER
Senior Counsel
Duke Energy Florida, LLC
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
T: 850.521.1428
F: 727.820.5041
E: Matthew.Bernier@duke-energy.com

**Duke Energy Florida, LLC
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 7th day of July, 2016 to all parties of record as indicated below.

s/Dianne M. Triplett

Attorney

<p>Rosanne Gervasi Keino Young Kelley Corbari Lee Eng Tan Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 kyoung@psc.state.fl.us korbari@psc.state.fl.us ltan@psc.state.fl.us rgervasi@psc.state.fl.us</p>	<p>Charles Rehwinkel J. R. Kelly 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 woods.monica@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 and Lara A. Wynn Stone Mattheis Xenopoulos & Brew, PC 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007-5201 jbrew@smxblaw.com law@smxblaw.com</p>
<p>Joseph Fichera Saber Partners, LLC 44 Wall Street New York, NY 10005 jfichera@saberpartners.com</p>	<p>Dean E. Criddle Orrick, Herrington & Sutcliffe 405 Howard Street, #11 San Francisco, CA 94105 dcriddle@orrick.com</p>
<p>Robert Scheffel Wright John T. LaVia, III Gardner, Bist, Bowden, Bush, Dee, LaVia & Wright, P.A. 1300 Thomaswood Drive Tallahassee, FL 32308 schef@gbwlegal.com jlavia@gbwlegal.com</p>	

Exhibit A

“CONFIDENTIAL”

(submitted under separate cover)

Exhibit B

REDACTED

(two copies)

Exhibit 8-B

The number of orders received and names of investors that placed the orders
(Provided REDACTED basis)

Rank	Investor Name	2-Year	5-Year	10-Year	15.2-Year	18.7-Year	Allocation (\$mm)
[REDACTED]							

Exhibit 8-B

The number of orders received and names of investors that placed the orders
(Provided REDACTED basis)

Rank	Investor Name	2-Year	5-Year	10-Year	15.2-Year	18.7-Year	Allocation (\$mm)
[REDACTED]							

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
Exhibit 8-B	All information with the exception of the headers is confidential.	<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 BRYAN BUCKLER

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval to include in base rates the revenue requirement for the CR3 regulatory asset, by Duke Energy Florida, Inc.

DOCKET NO. 150148-EI

In re: Petition for issuance of nuclear asset-recovery financing order, by Duke Energy Florida, Inc. d/b/a Duke Energy.

DOCKET NO. 150171-EI

DATED: July 7, 2016

**AFFIDAVIT OF BRYAN BUCKLER IN SUPPORT OF
DUKE ENERGY FLORIDA'S
NINETEENTH REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Bryan Buckler. 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 Nineteenth Request for Confidential Classification (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Director of Carolinas Finance in the Financial Planning and Analysis Department and also report to the Treasury of Duke Energy Corporation for purposes of this transaction.

3. DEF is seeking confidential classification for information contained in DEF's Issuance Advice Letter, specifically Exhibit 8-B. The confidential information at issue is contained in confidential Exhibit A to this Request and is outlined in DEF's Justification Matrix that is attached to DEF's Nineteenth 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.

4. DEF negotiates with potential investors to obtain competitive pricing for its bond allocation that provide economic value to DEF and its customers. In order to obtain competitive pricing, DEF must be able to assure its investors that sensitive business information, such as specific bond allocations will be kept confidential. With respect to the information at issue in this Request, DEF has kept confidential and has not publicly disclosed the confidential information. Absent such measures, investors would run the risk that the sensitive bond allocation information that has been provided in their orders with DEF would be made available to the public and as a result, end up in possession of potential competitors. Faced with that risk, investors who would otherwise contract with DEF might decide not to do so if DEF did not keep specific investor information confidential. Without DEF's measures to maintain the confidentiality of sensitive information in contracts and orders between DEF and investors, the Company's efforts to obtain competitive pricing could be undermined.

5. Additionally, the bond allocation information at issue contains confidential pricing information that would adversely impact DEF's competitive business interests if

disclosed to the public. If such information was disclosed to DEF's competitors, DEF's efforts to obtain competitive market pricing for its financial needs, that provide economic value to both DEF and its customers could be compromised by DEF's investors or competitors changing their purchasing behavior within the relevant markets.

6. Upon receipt of confidential information from financial companies working with DEF, and with its own confidential information, strict procedures are established and followed to maintain the confidentiality 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 documents. At no time since receiving the emails in question has the Company publicly disclosed this information. The Company has treated and continues to treat the documents at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 1 day of July, 2016.

W. Bryan Buckler

(Signature)
Bryan Buckler
Director of Regulated Accounting
Duke Energy Business Services, LLC
550 South Tryon Street
Charlotte, NC 28202

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 1 day of July, 2016 by BRYAN BUCKLER. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.



Heather Paige Blum

(Signature)

Heather Paige Blum

(Printed Name)

NOTARY PUBLIC, STATE OF NC

1-9-2018

(Commission Expiration Date)

CPO0692

(Serial Number, If Any)