



Matthew R. Bernier  
Associate General Counsel

August 24, 2018

**VIA ELECTRONIC FILING**

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

Re: *Fuel and purchased power cost recovery clause with generating performance incentive factor; Docket No. 20180001-EI*

Dear Ms. Stauffer:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF"), DEF's Request for Confidential Classification filed in connection with Exhibit No. \_\_ (CAM-3), to the direct testimony of Christopher A. Menendez. The filing includes the following:

- 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 Christopher A. Menendez)

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 (850) 521-1428 should you have any questions concerning this filing.

Respectfully,

*s/Matthew R. Bernier*

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Matthew R. Bernier  
[Matt.Bernier@duke-energy.com](mailto:Matt.Bernier@duke-energy.com)

MRB/mw  
Enclosures

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Fuel and purchased power cost  
recovery clause with generating  
performance incentive factor.

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Docket No. 20180001-EI

Dated: August 24, 2018

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

Duke Energy Florida, LLC (“DEF” or “Company”), pursuant to Section 366.093, Florida Statutes (“F.S.”), and Rule 25-22.006, Florida Administrative Code (“F.A.C.”), submits its Request for Confidential Classification for the confidential information Exhibit CAM-3, Part 3, Schedule E12-B, to the direct testimony of Christopher A. Menendez, filed in this docket on August 24, 2018. In support of this Request, DEF states:

1. Information contained in Exhibit No. (CAM-3), Part 3, Schedule E12-B, page 1 of 1, to the direct testimony of Christopher A. Menendez contains information that is “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 unredacted copies 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 versions, the information asserted to be confidential is highlighted 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.

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 contractual cost data pertaining to the RRSSA Second Amendment. Pursuant to its contracts, DEF is obligated to maintain the confidentiality of this information, and therefore it qualifies for confidential classification. *See* § 366.093(3)(d), F.S.; Affidavit of Christopher A. Menendez at ¶ 4. If DEF cannot assure contracting parties that it can maintain the confidentiality of contractual terms, those parties and other similarly situated parties may forego entering contracts with DEF, which would adversely impact DEF’s competitive business interests. *See* § 366.093(3)(d), F.S.; Affidavit of Christopher A. Menendez at ¶¶4-5.

4. Certain information must be protected because disclosure of that information would allow other parties and the public to compute the confidential information discussed above (e.g., cost subtotals and totals), and therefore that information must be protected from public disclosure in order to protect the confidential contractual information at issue. *See* § 366.093(3)(d) and (e), F.S.; Affidavit of Christopher A. Menendez 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 Christopher A. Menendez at ¶ 6. The information has not been disclosed to the public, and the Company has treated and continues to treat the information and contracts at issue as confidential. *See id.*

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 the Request for Confidential Classification be granted.

Respectfully submitted this 24<sup>th</sup> day of August, 2018.

*s/Matthew R. Bernier*

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**Duke Energy Florida, LLC**  
Docket No.: 20180001-EI  
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 24<sup>th</sup> day of August, 2018 to all parties of record as indicated below.

*s/Matthew R. Bernier*

Attorney

<p>Suzanne Brownless / Johana Nieves Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:sbrownle@psc.state.fl.us">sbrownle@psc.state.fl.us</a> <a href="mailto:jnieves@psc.state.fl.us">jnieves@psc.state.fl.us</a></p> <p>James Beasley / J. Jeffrey Wahlen Ausley McMullen P.O. Box 391 Tallahassee, FL 32302 <a href="mailto:jbeasley@ausley.com">jbeasley@ausley.com</a> <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a></p> <p>Russell Badders / Steven Griffin Beggs &amp; Lane P.O. Box 12950 Pensacola, FL 32591 <a href="mailto:rab@beggslane.com">rab@beggslane.com</a> <a href="mailto:src@beggslane.com">src@beggslane.com</a></p> <p>Rhonda J. Alexander / Jeffrey A. Stone Gulf Power Company One Energy Place Pensacola, FL 32520 <a href="mailto:rjalexad@southernco.com">rjalexad@southernco.com</a> <a href="mailto:jastone@southernco.com">jastone@southernco.com</a></p> <p>Beth Keating Gunster, Yoakley &amp; Stewart, P.A. 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 <a href="mailto:bkeating@gunster.com">bkeating@gunster.com</a></p>	<p>Charles Rehwinkel / J.R. Kelly / Patricia Christensen Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 <a href="mailto:kelly.jr@leg.state.fl.us">kelly.jr@leg.state.fl.us</a> <a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a> <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a></p> <p>Ms. Paula K. Brown Regulatory Affairs Tampa Electric Company P.O. Box 111 Tampa, FL 33601-0111 <a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a></p> <p>John Butler / Maria Moncada Florida Power &amp; Light Company 700 Universe Blvd (LAW/JB) Juno Beach, FL 33408-0420 <a href="mailto:john.butler@fpl.com">john.butler@fpl.com</a> <a href="mailto:maria.moncada@fpl.com">maria.moncada@fpl.com</a></p> <p>Robert Scheffel Wright / John T. LaVia, III c/o Gardner Law Firm 1300 Thomaswood Drive Tallahassee, FL 32308 <a href="mailto:schef@gbwlegal.com">schef@gbwlegal.com</a> <a href="mailto:jlavia@gbwlegal.com">jlavia@gbwlegal.com</a></p>	<p>Kenneth A. Hoffman Florida Power &amp; Light Company 215 S. Monroe Street, Suite 810 Tallahassee, FL 32301-1858 <a href="mailto:ken.hoffman@fpl.com">ken.hoffman@fpl.com</a></p> <p>James Brew / Laura Wynn Stone Law Firm 1025 Thomas Jefferson St., N.W. Suite 800 West Washington, DC 20007 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:law@smxblaw.com">law@smxblaw.com</a></p> <p>Mike Cassel Florida Public Utilities Company 1750 S. 14<sup>th</sup> Street, Suite 200 Fernandina Beach, FL 32034 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a></p> <p>Jon C. Moyle, Jr. Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, FL 32301 <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a></p>
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# **Exhibit A**

**“CONFIDENTIAL”**

**(submitted under separate cover)**

# **Exhibit B**

**REDACTED**

**(two copies)**



	ACT Jan-18	ACT Feb-18	ACT Mar-18	ACT Apr-18	ACT May-18	ACT Jun-18	EST Jul-18	EST Aug-18	EST Sep-18	EST Oct-18	EST Nov-18	EST Dec-18	TOTAL
<b>1 Base Production Level Capacity Costs</b>													
2 Orange Cogen (ORANGE CO)	5,071,564	5,590,987	5,331,276	5,331,276	5,331,276	5,331,276	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	63,975,305
3 Orlando Cogen Limited (ORLACOGL)	5,025,789	5,514,457	5,302,972	5,361,969	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	64,099,507
4 Pasco County Resource Recovery (PASCOUNT)	1,784,800	2,011,580	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	22,778,280
5 Pinellas County Resource Recovery (PINCOUNT)	4,248,600	4,788,435	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	54,222,210
6 Polk Power Partners, L.P. (MULBERRY/ROYSER)	6,965,675	7,676,459	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	87,852,794
7 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	765,872	790,760	798,927	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	9,564,071
8 US EcoGen	(93,000)	(93,000)	(84,000)	(93,000)	(90,000)	(93,000)	-	-	-	-	-	-	(546,000)
9 Subtotal - Base Level Capacity Costs	23,769,300	26,279,678	25,086,949	25,138,964	25,141,785	25,138,785	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	301,946,167
10 Base Production Jurisdictional Responsibility	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	
11 Base Level Jurisdictional Capacity Costs	22,078,114	24,409,879	23,302,013	23,350,326	23,352,947	23,350,161	23,436,543	23,436,543	23,436,543	23,436,543	23,436,543	23,436,543	280,462,697
<b>12 Intermediate Production Level Capacity Costs</b>													
13 Southern Franklin	4,609,957	4,467,756	2,685,103	2,663,030	2,934,373	4,811,161	6,293,135	6,293,135	4,631,783	2,693,539	2,693,539	3,524,215	48,300,723
14 Schedule H Capacity Sales - NSB & RCID	(208,753)	(31,799)	379,669	270	(27,441)	-	-	-	-	-	-	-	111,946
15 Subtotal - Intermediate Level Capacity Costs	4,401,204	4,435,957	3,064,772	2,663,300	2,906,932	4,811,161	6,293,135	6,293,135	4,631,783	2,693,539	2,693,539	3,524,215	48,412,669
16 Intermediate Production Jurisdictional Responsibility	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	
17 Intermediate Level Jurisdictional Capacity Costs	3,199,808	3,225,074	2,228,181	1,936,299	2,113,427	3,497,858	4,575,298	4,575,298	3,367,445	1,958,283	1,958,283	2,562,210	35,197,463
<b>18 Peaking Production Level Capacity Costs</b>													
19 Shady Hills	1,984,500	1,984,500	1,417,500	1,371,600	1,920,240	3,904,200	3,911,684	3,911,684	1,825,453	1,374,376	1,374,376	1,983,330	26,963,442
20 Vandolah (NSG)	2,926,756	2,888,311	1,965,274	1,943,845	2,795,467	5,725,022	5,539,623	5,495,150	2,629,977	1,937,310	1,981,783	2,788,227	38,616,745
21 Other	-	-	-	-	-	-	-	-	-	-	-	-	-
22 Subtotal - Peaking Level Capacity Costs	4,911,256	4,872,811	3,382,774	3,315,445	4,715,707	9,629,222	9,451,307	9,406,834	4,455,430	3,311,686	3,356,159	4,771,557	65,580,188
23 Peaking Production Jurisdictional Responsibility	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	
24 Peaking Level Jurisdictional Capacity Costs	4,711,073	4,674,196	3,244,893	3,180,307	4,523,495	9,236,735	9,066,072	9,023,412	4,273,827	3,176,702	3,219,362	4,577,068	62,907,139
<b>25 Other Capacity Costs</b>													
26 Retail Wheeling													
27 RRSSA Second Amendment <sup>1</sup>													
28 Total Other Capacity Costs													
<b>29 Total Capacity Costs (Line 11+17+24+28)</b>	31,537,913	33,933,287	30,392,188	30,081,704	31,569,791	37,695,859	38,691,081	38,651,525	32,683,005	30,171,375	30,222,229	32,184,839	397,814,797
<b>30 Nuclear Cost Recovery Clause</b>													
31 CR3 Uprate Costs	4,290,186	4,261,861	4,233,534	4,205,208	4,176,884	4,148,557	4,120,232	4,091,907	4,063,580	4,035,255	4,006,929	3,978,603	49,612,736
32 Total Recoverable Nuclear Costs	4,290,186	4,261,861	4,233,534	4,205,208	4,176,884	4,148,557	4,120,232	4,091,907	4,063,580	4,035,255	4,006,929	3,978,603	49,612,736
<b>33 ISFSI Revenue Requirement <sup>2</sup></b>	677,047	628,287	579,175	555,717	573,770	573,765	573,765	573,765	573,765	573,765	573,765	573,765	7,030,351
<b>34 Total Recov Capacity &amp; Nuclear Costs (Line 29+32+33)</b>	36,505,147	38,823,435	35,204,897	34,842,630	36,320,446	42,418,181	43,385,077	43,317,197	37,320,350	34,780,394	34,802,924	36,737,207	454,457,884
<b>35 Capacity Revenues</b>													
36 Capacity Cost Recovery Revenues (net of tax)	35,082,201	37,272,890	35,441,587	33,706,211	34,969,792	41,859,835	46,576,445	48,650,437	47,554,221	43,166,059	36,691,945	34,902,418	475,874,041
37 Prior Period True-Up Provision Over/(Under) Recovery	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(5,121,339)
38 Current Period Revenues (net of tax)	34,655,423	36,846,111	35,014,809	33,279,433	34,543,014	41,433,057	46,149,667	48,223,659	47,127,442	42,739,281	36,265,167	34,475,639	470,752,702
<b>39 True-Up Provision</b>													
40 True-Up Provision - Over/(Under) Recov (Line 38-34)	(1,849,724)	(1,977,324)	(190,089)	(1,563,197)	(1,777,432)	(985,123)	2,764,590	4,906,462	9,807,092	7,958,887	1,462,243	(2,261,567)	16,294,818
41 Interest Provision for the Month	(6,952)	(8,935)	(11,087)	(12,566)	(14,513)	(16,532)	(5,949)	(1,687)	6,498	13,212	14,734	13,278	(30,499)
42 Current Cycle Balance - Over/(Under)	(1,856,676)	(3,842,934)	(4,044,110)	(5,619,874)	(7,411,819)	(8,413,473)	(5,654,833)	(750,058)	9,063,532	17,035,631	18,512,608	16,264,319	16,264,319
43 Prior Period Balance - Over/(Under) Recovered	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)
44 Prior Period Cumulative True-Up Collected/(Refunded)	426,778	853,557	1,280,335	1,707,113	2,133,891	2,560,670	2,987,448	3,414,226	3,841,004	4,267,783	4,694,561	5,121,339	5,121,339
45 Prior Period True-up Balance - Over/(Under)	(4,348,407)	(3,921,628)	(3,494,850)	(3,068,072)	(2,641,294)	(2,214,515)	(1,787,737)	(1,360,959)	(934,181)	(507,402)	(80,624)	346,154	346,154
<b>46 Net Capacity True-up Over/(Under) (Line 42+45)</b>	(\$6,205,082)	(\$7,764,563)	(\$7,538,961)	(\$8,687,945)	(\$10,053,112)	(\$10,627,989)	(\$7,442,570)	(\$2,111,017)	\$8,129,352	\$16,528,229	\$18,431,984	\$16,610,473	\$16,610,473

<sup>1</sup> Approved in Commission Order No. PSC-2016-0138-FOF-EI

<sup>2</sup> Approved in Commission Order No. PSC-2016-0425-PAA-EI

	ACT Jan-18	ACT Feb-18	ACT Mar-18	ACT Apr-18	ACT May-18	ACT Jun-18	EST Jul-18	EST Aug-18	EST Sep-18	EST Oct-18	EST Nov-18	EST Dec-18	TOTAL
<b>1 Base Production Level Capacity Costs</b>													
2 Orange Cogen (ORANGE CO)	5,071,564	5,590,987	5,331,276	5,331,276	5,331,276	5,331,276	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	63,975,305
3 Orlando Cogen Limited (ORLACOGL)	5,025,789	5,514,457	5,302,972	5,361,969	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	64,099,507
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6 Polk Power Partners, L.P. (MULBERRY/ROYSER)	6,965,675	7,676,459	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	87,852,794
7 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	765,872	790,760	798,927	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	9,564,071
8 US EcoGen	(93,000)	(93,000)	(84,000)	(93,000)	(90,000)	(93,000)	-	-	-	-	-	-	(546,000)
9 Subtotal - Base Level Capacity Costs	23,769,300	26,279,678	25,086,949	25,138,964	25,141,785	25,138,785	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	301,946,167
10 Base Production Jurisdictional Responsibility	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	
11 Base Level Jurisdictional Capacity Costs	22,078,114	24,409,879	23,302,013	23,350,326	23,352,947	23,350,161	23,436,543	23,436,543	23,436,543	23,436,543	23,436,543	23,436,543	280,462,697
<b>12 Intermediate Production Level Capacity Costs</b>													
13 Southern Franklin	4,609,957	4,467,756	2,685,103	2,663,030	2,934,373	4,811,161	6,293,135	6,293,135	4,631,783	2,693,539	2,693,539	3,524,215	48,300,723
14 Schedule H Capacity Sales - NSB & RCID	(208,753)	(31,799)	379,669	270	(27,441)	-	-	-	-	-	-	-	111,946
15 Subtotal - Intermediate Level Capacity Costs	4,401,204	4,435,957	3,064,772	2,663,300	2,906,932	4,811,161	6,293,135	6,293,135	4,631,783	2,693,539	2,693,539	3,524,215	48,412,669
16 Intermediate Production Jurisdictional Responsibility	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	
17 Intermediate Level Jurisdictional Capacity Costs	3,199,808	3,225,074	2,228,181	1,936,299	2,113,427	3,497,858	4,575,298	4,575,298	3,367,445	1,958,283	1,958,283	2,562,210	35,197,463
<b>18 Peaking Production Level Capacity Costs</b>													
19 Shady Hills	1,984,500	1,984,500	1,417,500	1,371,600	1,920,240	3,904,200	3,911,684	3,911,684	1,825,453	1,374,376	1,374,376	1,983,330	26,963,442
20 Vandolah (NSG)	2,926,756	2,888,311	1,965,274	1,943,845	2,795,467	5,725,022	5,539,623	5,495,150	2,629,977	1,937,310	1,981,783	2,788,227	38,616,745
21 Other	-	-	-	-	-	-	-	-	-	-	-	-	-
22 Subtotal - Peaking Level Capacity Costs	4,911,256	4,872,811	3,382,774	3,315,445	4,715,707	9,629,222	9,451,307	9,406,834	4,455,430	3,311,686	3,356,159	4,771,557	65,580,188
23 Peaking Production Jurisdictional Responsibility	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	
24 Peaking Level Jurisdictional Capacity Costs	4,711,073	4,674,196	3,244,893	3,180,307	4,523,495	9,236,735	9,066,072	9,023,412	4,273,827	3,176,702	3,219,362	4,577,068	62,907,139
<b>25 Other Capacity Costs</b>													
26 Retail Wheeling													
27 RRSSA Second Amendment <sup>1</sup>													
28 Total Other Capacity Costs													
<b>29 Total Capacity Costs (Line 11+17+24+28)</b>	31,537,913	33,933,287	30,392,188	30,081,704	31,569,791	37,695,859	38,691,081	38,651,525	32,683,005	30,171,375	30,222,229	32,184,839	397,814,797
<b>30 Nuclear Cost Recovery Clause</b>													
31 CR3 Uprate Costs	4,290,186	4,261,861	4,233,534	4,205,208	4,176,884	4,148,557	4,120,232	4,091,907	4,063,580	4,035,255	4,006,929	3,978,603	49,612,736
32 Total Recoverable Nuclear Costs	4,290,186	4,261,861	4,233,534	4,205,208	4,176,884	4,148,557	4,120,232	4,091,907	4,063,580	4,035,255	4,006,929	3,978,603	49,612,736
<b>33 ISFSI Revenue Requirement <sup>2</sup></b>	677,047	628,287	579,175	555,717	573,770	573,765	573,765	573,765	573,765	573,765	573,765	573,765	7,030,351
<b>34 Total Recov Capacity &amp; Nuclear Costs (Line 29+32+33)</b>	36,505,147	38,823,435	35,204,897	34,842,630	36,320,446	42,418,181	43,385,077	43,317,197	37,320,350	34,780,394	34,802,924	36,737,207	454,457,884
<b>35 Capacity Revenues</b>													
36 Capacity Cost Recovery Revenues (net of tax)	35,082,201	37,272,890	35,441,587	33,706,211	34,969,792	41,859,835	46,576,445	48,650,437	47,554,221	43,166,059	36,691,945	34,902,418	475,874,041
37 Prior Period True-Up Provision Over/(Under) Recovery	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(426,778)	(5,121,339)
38 Current Period Revenues (net of tax)	34,655,423	36,846,111	35,014,809	33,279,433	34,543,014	41,433,057	46,149,667	48,223,659	47,127,442	42,739,281	36,265,167	34,475,639	470,752,702
<b>39 True-Up Provision</b>													
40 True-Up Provision - Over/(Under) Recov (Line 38-34)	(1,849,724)	(1,977,324)	(190,089)	(1,563,197)	(1,777,432)	(985,123)	2,764,590	4,906,462	9,807,092	7,958,887	1,462,243	(2,261,567)	16,294,818
41 Interest Provision for the Month	(6,952)	(8,935)	(11,087)	(12,566)	(14,513)	(16,532)	(5,949)	(1,687)	6,498	13,212	14,734	13,278	(30,499)
42 Current Cycle Balance - Over/(Under)	(1,856,676)	(3,842,934)	(4,044,110)	(5,619,874)	(7,411,819)	(8,413,473)	(5,654,833)	(750,058)	9,063,532	17,035,631	18,512,608	16,264,319	16,264,319
43 Prior Period Balance - Over/(Under) Recovered	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)	(4,775,185)
44 Prior Period Cumulative True-Up Collected/(Refunded)	426,778	853,557	1,280,335	1,707,113	2,133,891	2,560,670	2,987,448	3,414,226	3,841,004	4,267,783	4,694,561	5,121,339	5,121,339
45 Prior Period True-up Balance - Over/(Under)	(4,348,407)	(3,921,628)	(3,494,850)	(3,068,072)	(2,641,294)	(2,214,515)	(1,787,737)	(1,360,959)	(934,181)	(507,402)	(80,624)	346,154	346,154
<b>46 Net Capacity True-up Over/(Under) (Line 42+45)</b>	(\$6,205,082)	(\$7,764,563)	(\$7,538,961)	(\$8,687,945)	(\$10,053,112)	(\$10,627,989)	(\$7,442,570)	(\$2,111,017)	\$8,129,352	\$16,528,229	\$18,431,984	\$16,610,473	\$16,610,473

<sup>1</sup> Approved in Commission Order No. PSC-2016-0138-FOF-EI

<sup>2</sup> Approved in Commission Order No. PSC-2016-0425-PAA-EI

## Exhibit C

### DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
Exhibit ___(CAM-3), Part 3, Schedule E12-B, Page 1 of 1, to the direct testimony of Christopher A. Menendez	<p><b>Line 26:</b> Retail Wheeling: all costs for January 2018 through December 2018 to include the total.</p> <p><b>Line 27:</b> RRSSA Second Amendment: all costs for January 2018 through December 2018 to include the total.</p> <p>Line 28: Total Other Capacity Costs: all costs for January 2018 through December 2018 to include the total.</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) 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**  
**CHRISTOPHER A.**  
**MENENDEZ**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Fuel and purchased power cost  
recovery clause with generating  
performance incentive factor

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Docket No. 20180001-EI

Dated: August 24, 2018

**AFFIDAVIT OF CHRISTOPHER A. MENENDEZ 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 Christopher A. Menendez, who being first duly sworn, on oath deposes and says that:

1. My name is Christopher A. Menendez. I am over the age of 18 years old and I have been authorized by Duke Energy Florida, LLC (hereinafter "DEF" or the "Company") to give this affidavit in the above-styled proceeding on DEF's behalf and in support of DEF's First Request for Confidential Classification (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Rates and Regulatory Strategy Manager within the Regulatory Planning Projects Department. This department is responsible for regulatory planning and cost recovery for DEF.

3. As the Rates and Regulatory Strategy Manager, I am responsible, along with the other members of the section, for the production and review of the regulatory

financial reports of DEF and analysis of state, federal and local regulations and their impact on DEF.

4. DEF is seeking confidential classification for information contained in Exhibit \_\_ (CAM-3), Part 3, portions of Schedule E12-B, Page 1 of 1, to my direct testimony filed in this docket on August 24, 2018. 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 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. Additionally, the disclosure of confidential information between DEF and its suppliers or information contained in DEF's contracts, proposals, and other such documents could adversely impact DEF's competitive business interests. If such information was disclosed to DEF's competitors or prospective buyers in the marketplace, DEF's efforts to obtain competitive capacity purchase options or fuel sales contracts 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. Absent such measures, suppliers would run the risk that sensitive business information that they provided in their contracts with DEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, companies who would otherwise contract with DEF might not do so if DEF did not keep the terms of their contracts confidential. Without DEF's measures to maintain the confidentiality of sensitive terms in contracts between

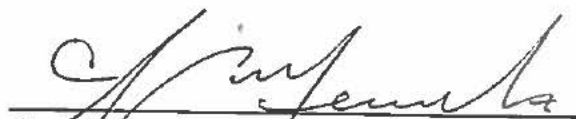
DEF and capacity suppliers, the Company's efforts to obtain competitive contracts could be undermined.

6. Upon receipt of confidential information from capacity suppliers, 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.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 22<sup>nd</sup> day of August, 2018.

  
Christopher A. Menendez  
Rates and Regulatory Strategy Manager  
Regulatory Planning Projects Department  
Duke Energy Florida, LLC  
299 1<sup>st</sup> Avenue North  
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 22 day of August, 2018, by Christopher A. Menendez. 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

3/23/2022  
(Commission Expiration Date)

GG 180580  
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

