



Matthew R. Bernier
Associate General Counsel
Duke Energy Florida, LLC.

March 20, 2019

VIA ELECTRONIC FILING

Mr. Adam Teitzman, 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. 20190001-EI

Dear Mr. Teitzman:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF"), DEF's Request for Confidential Classification filed in connection with its Response to Staff's First Set of Interrogatories (Nos. 1-8). 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 Jim McClay)

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

Matthew R. Bernier

MRB/mw
Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20190001-EI

Dated: March 20, 2019

**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 this Request for Confidential Classification for certain information provided in response to Staff’s First Set of Interrogatories (Nos. 1-8). In support of this Request, DEF states:

1. DEF’s responses to Staff’s First Set of Interrogatories, specifically questions 1, 3, 4, 5, and 6 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 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 competitively negotiated data, such as bid evaluations and fuel supply contracts, the disclosure of which would impair the efforts of the Company or its affiliates to negotiate fuel supply contracts on favorable terms. *See* § 366.093(3)(d), F.S.; Affidavit of Jim McClay at ¶ 5. Furthermore, the information at issue relates to the competitive interests of DEF and its fuel suppliers, the disclosure of which would impair their competitive businesses. *See* § 366.093(3)(e), F.S.; Affidavit of Jim McClay at ¶ 6. 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 Jim McClay at ¶ 7. 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* Affidavit of Jim McClay at ¶ 7.

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 20th day of March, 2019.

s/Matthew R. Bernier

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Duke Energy Florida, Inc.
Docket No.: 20190001
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 20th day of March, 2019 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 sbrownle@psc.state.fl.us jnieves@psc.state.fl.us</p> <p>James Beasley / J. Jeffrey Wahlen Ausley McMullen P.O. Box 391 Tallahassee, FL 32302 jbeasley@ausley.com jwahlen@ausley.com</p> <p>Russell A. Badders Gulf Power Company One Energy Place Pensacola, FL 32520 russell.badders@nexteraenergy.com</p> <p>Holly Henderson Gulf Power Company 215 S. Monroe St., Ste. 618 Tallahassee, FL 32301 holly.henderson@nexteraenergy.com</p>	<p>J.R. Kelly / P. Christensen / T. David / S. Morse Office of Public Counsel 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us christensen.patty@leg.state.fl.us david.tad@leg.state.fl.us morse.stephanie@leg.state.fl.us</p> <p>Ms. Paula K. Brown Regulatory Affairs Tampa Electric Company P.O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com</p> <p>Maria Moncada / Joel Baker Florida Power & Light Company 700 Universe Blvd. (LAW/JB) Juno Beach, FL 33408-0420 maria.moncada@fpl.com joel.baker@fpl.com</p> <p>James Brew / Laura Wynn Stone Law Firm 1025 Thomas Jefferson St., N.W. Suite 800 West Washington, DC 20007 jbrew@smxblaw.com law@smxblaw.com</p> <p>Robert Scheffel Wright / John T. LaVia, III c/o Gardner Law Firm 1300 Thomaswood Drive Tallahassee, FL 32308 schef@gbwlegal.com jlavia@gbwlegal.com</p>	<p>Steven Griffin Beggs & Lane P.O. Box 12950 Pensacola, FL 32591 srg@beggslane.com</p> <p>Kenneth A. Hoffman Florida Power & Light Company 134 W. Jefferson Street Tallahassee, FL 32301-1713 ken.hoffman@fpl.com</p> <p>Jon C. Moyle, Jr. Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com mqualls@moylelaw.com</p> <p><u>Mike Cassel</u> Florida Public Utilities Company 1750 S. 14th Street, Suite 200 Fernandina Beach, FL 32034 mcassel@fpuc.com</p> <p>Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 bkeating@gunster.com</p>
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Exhibit A

“CONFIDENTIAL”

(submitted under separate cover)

Exhibit B

REDACTED

(two copies)

confidential; a redacted version is attached hereto and an unredacted copy has been filed with the Commission along with DEF's Request for Confidential Classification dated March 20, 2019.

5. Please describe the action taken for each bid identified in response to Interrogatory No. 4. Include in your response an explanation of the evaluation process and how successful proposals were selected.

Answer:

Please see confidential attachments bearing bates numbers DEF-19FL-FUEL-000006 through bearing bates numbers DEF-19FL-FUEL-000010 provided in response to Question 4. In summary, as part of DEF's on-going strategy to maintain a diverse, secure, and competitively priced natural gas supply portfolio to meet its gas generation needs, DEF conducts periodic gas supply RFPs and solicitations to procure natural gas supply over time. DEF requests specific time periods and locations that represent firm natural gas supply receipt point locations on DEF's firm transportation agreements. As outlined in the referenced attachments, bids were evaluated and selected based on credit, economics, location, term, and supply requirements.

6. In 2018, did DEF participate in any capacity discussions or bid for any firm pipeline capacity during "open season?" Please explain your response and identify the pipeline companies.

REDACTED

Answer:

DEF engages in ongoing discussions with various gas suppliers, pipelines and existing storage providers to stay abreast of developments and potential gas pipeline opportunities. During 2018,

[REDACTED]

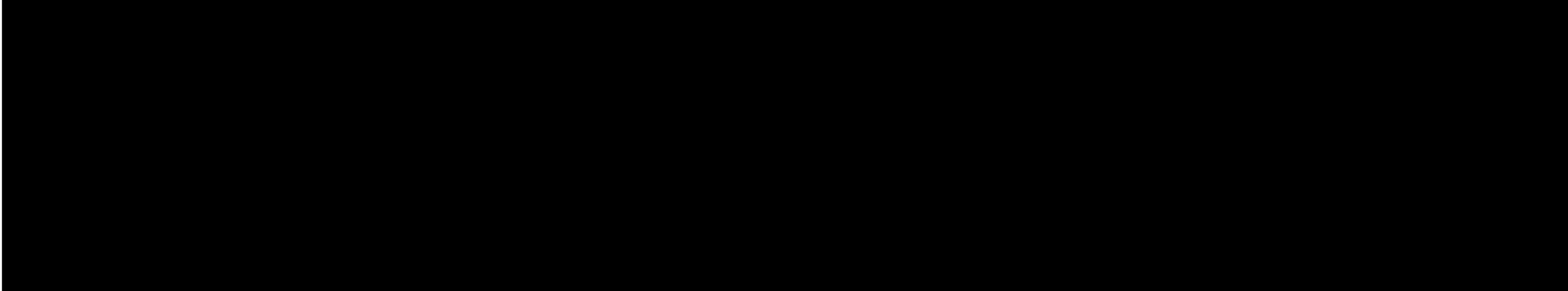
7. In 2018, did DEF participate in any discussions or bid for any firm gas storage capacity? Please explain your response and identify the gas storage providers.

Answer:

REDACTED

Station: CRYSTAL RIVER 4&5

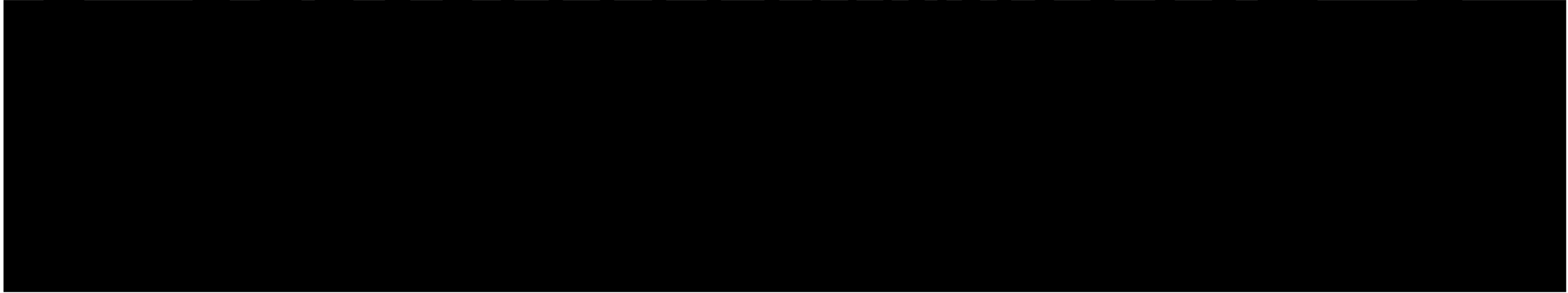
<u>Sales Co.</u>	<u>Producer</u>	<u>Start Date</u>	<u>End Date</u>	<u>Rail Barge</u>	<u>Region</u>	<u>March Vol</u>	<u>April Vol</u>	<u>May Vol</u>	<u>June Vol</u>	<u>Btu</u>	<u>Moist %</u>	<u>Ash %</u>	<u>Suf %</u>	<u>Grd</u>	<u>Vol %</u>	<u>AFT</u>	<u>Chl</u>	<u>LBS SO2</u>	<u>Offer Price \$/Ton</u>	<u>Total Freight Cost</u>	<u>Delivered \$/Ton</u>	<u>\$/MmBtu Delvd O&M, S02 Adj</u>	<u>Comments</u>
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REDACTED

Station: CRYSTAL RIVER 4&5

Sales Co.	Producer	Start Date	End Date	Rail Barge	Region	May Vol	June Vol	July Vol	August Vol	September Vol	Btu	Moist %	Ash %	Suf %	Grd	Vol %	AFT	Chl	LBS SO2	Offer Price \$/Ton	Total Freight Cost	Delivered \$/Ton	\$/MmBtu Delvd O&M, S02 Adj	Comments
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REDACTED

Station: Crystal River 4&5

Bid #	Year	Counterparty	Region	Mode	Annual Volume	Btu/lb	SO2/mmBt	Ash %	FOB Point	Mine \$ /ton	Barge	Transportation \$/ton				Delivered \$/ton	\$/MmBtu		Comments
												Terminal	Truck	Rail	Other		Delvd	O&M, S02 Adj	
[REDACTED]																			

REDACTED

Station: Crystal River 4&5

<u>Bid #</u>	<u>Year</u>	<u>Counterparty</u>	<u>Region</u>	<u>Mode</u>	<u>Annual Volume</u>	<u>Btu/lb</u>	<u>SO2/mmBt</u>	<u>Ash %</u>	<u>FOB Point</u>	<u>Mine \$ /ton</u>	<u>Barge</u>	<u>Transportation \$/ton</u>				<u>Delivered \$/ton</u>	<u>\$/MmBtu Delvd</u>		<u>Comments</u>
												<u>Terminal</u>	<u>Truck</u>	<u>Rail</u>	<u>Other</u>		<u>O&M, S02 Adj</u>		
[REDACTED]																			

REDACTED

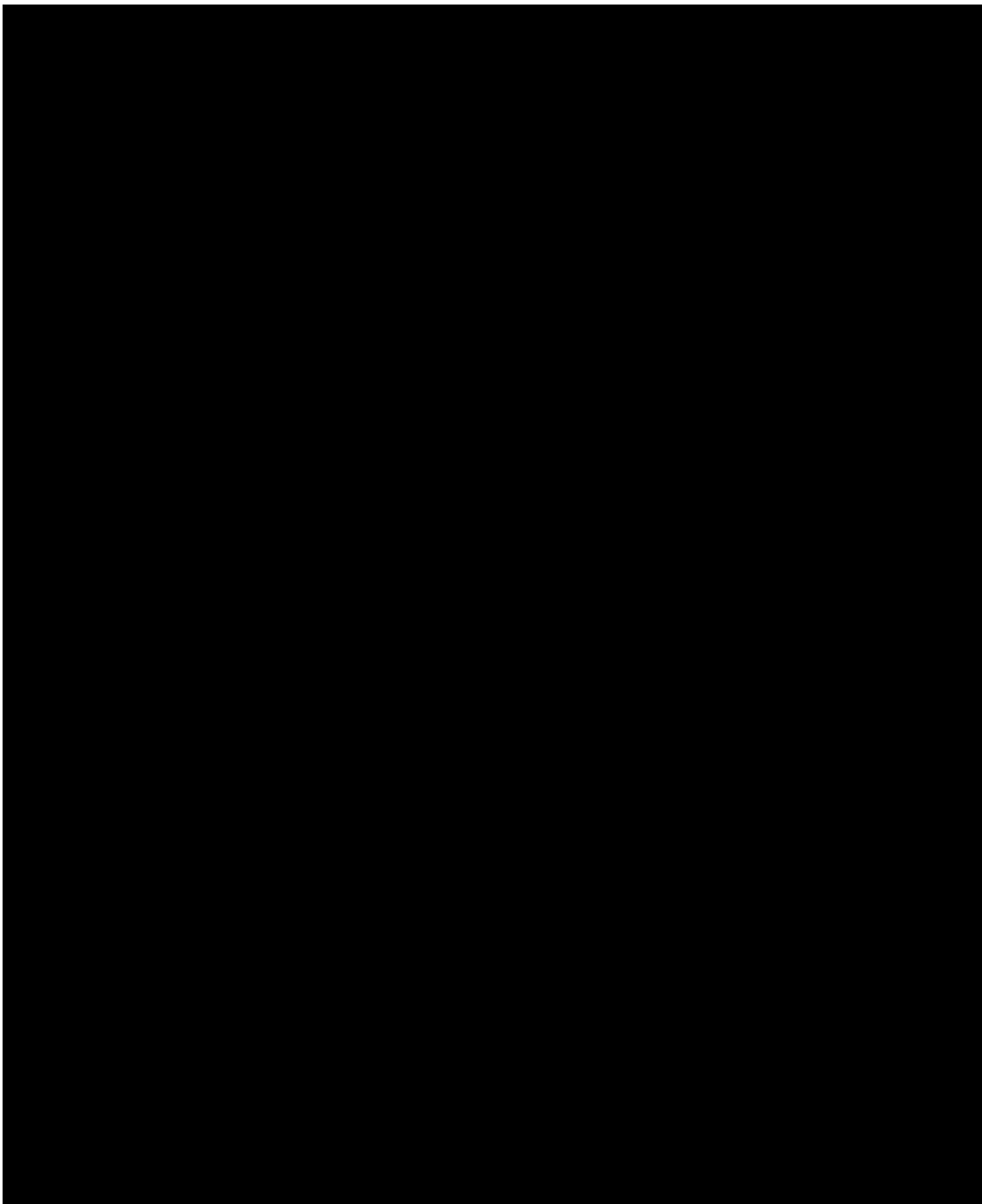
DEF Coal Demurrage and Detentions January - December 2018

Docket No.20190001-EI

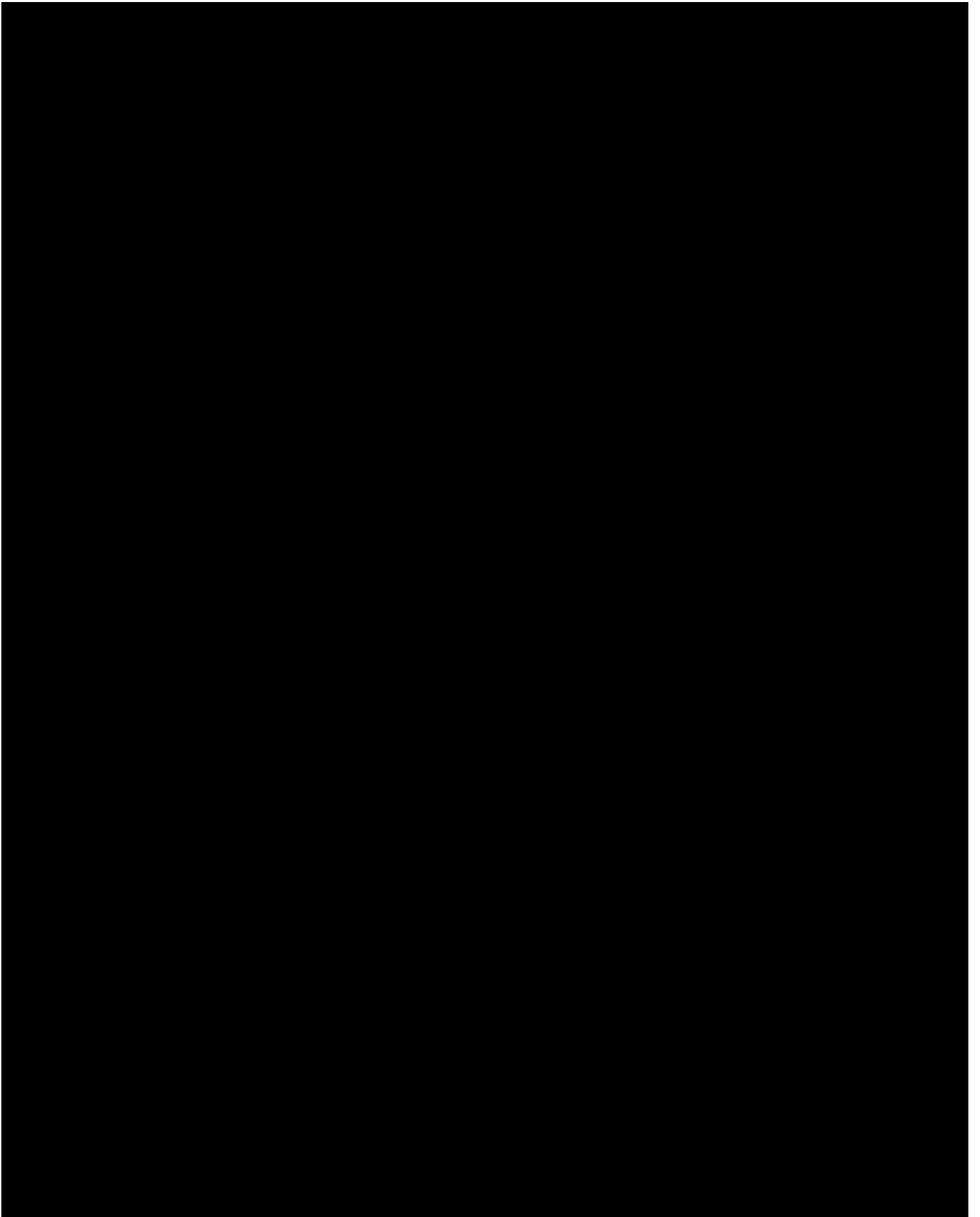
DEF's Response to Staff's 1st Set of Interrogatories (1-8)

PS ROG 1-3 DEF-19FL-FUEL

Counterparty	January	February	March	April	May	June	July	August	September	October	November	December	Grand Total
EMI PA INC FLNORTHERN IMT INGRAM BARGE COMPANY KIRBY OCEAN TRANSPORT CO													
Grand Total	\$ 134,884.57	\$ 9,420.00	\$ 1,410,183.27	\$ 877,610.07	\$ 3,358,208.73	\$ 1,879,531.06	\$ 3,206,987.84	\$ 1,082,530.58	\$ 866,551.55	\$ 2,588,336.46	\$ 336,995.16	\$ 707,308.04	\$ 16,458,547.33

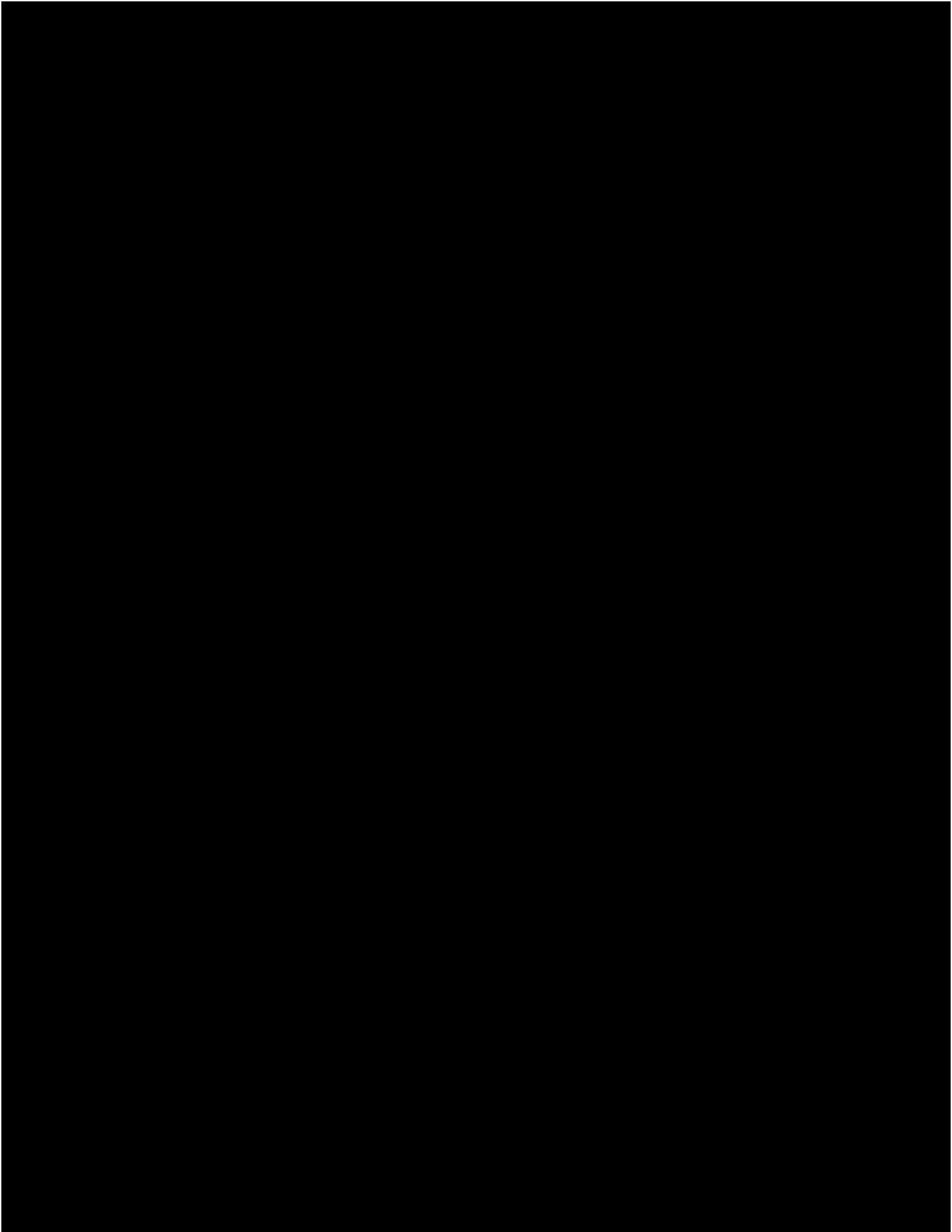


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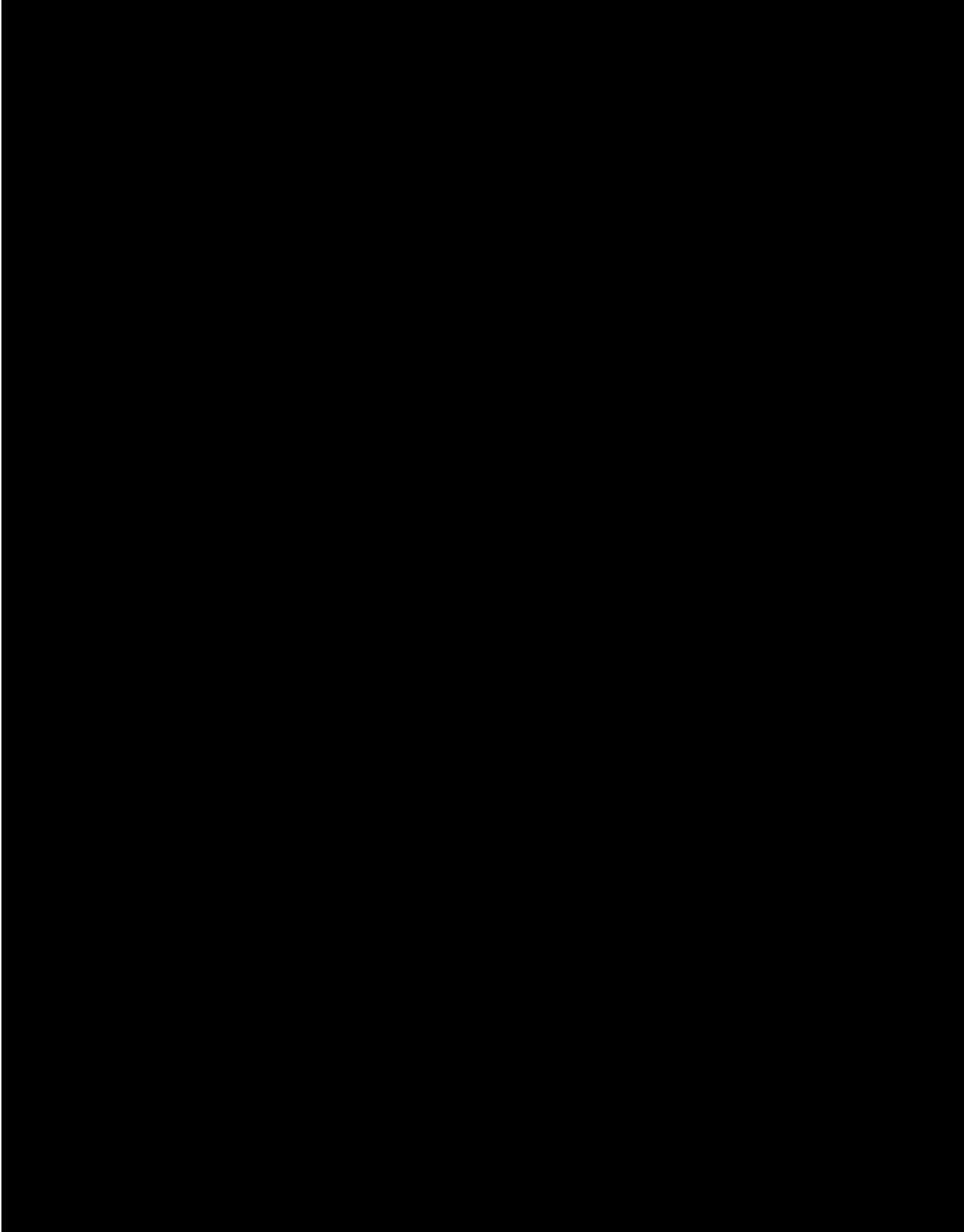
DEF-19FL-FUEL-000007

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DEF-19FL-FUEL-000008

REDACTED



Package #1 – Southeast Supply Header’s (“SESH”) Centerpoint, Gulf South, Columbia Gulf, Tiger, Texas Eastern and/or TGP (SESH Locations #83001/#83003/#83004/#83014/#83005/#83008)

Curve date of July 2, 2018 used for evaluation

COMPANY (Seller)	DELIVERY POINT	SUPPLY SOURCE Onshore, Offshore or LNG (% from Supply Source)	TERM		VOLUME		PRICING							NOTES/OTHER
			Start	Termination	MIN (Dth/day)	MAX (Dth/day)	INDEX (NYMEX LDS / IFERC / Argus)	Location (i.e. "IFERC Transco Zone 4" or "N/A" for NYMEX LDS)	Price Adder or (Discount) to LDS, IFERC or Argus	Reservation / Demand Fee (\$ per Dth)	Average IFERC Basis for Term or "0" for NYMEX LDS	Price Adder (Discount) to LDS or IF	Estimated Total Basis	

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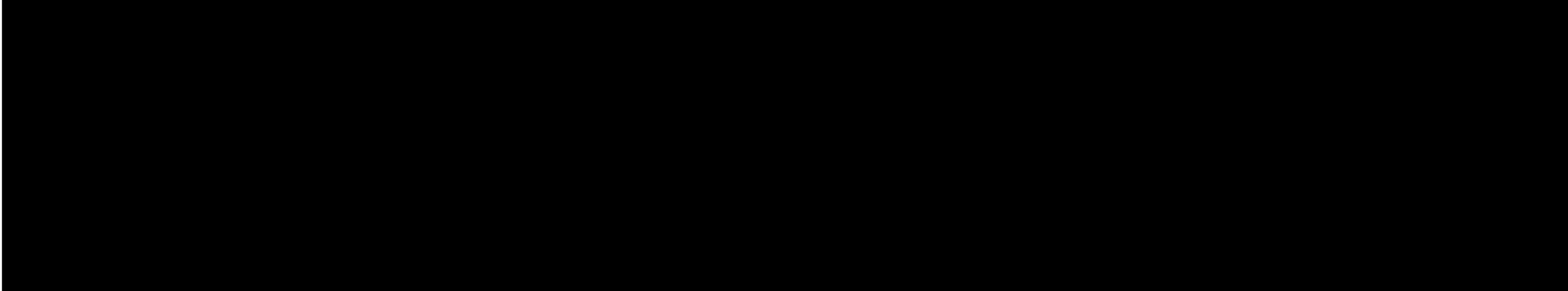
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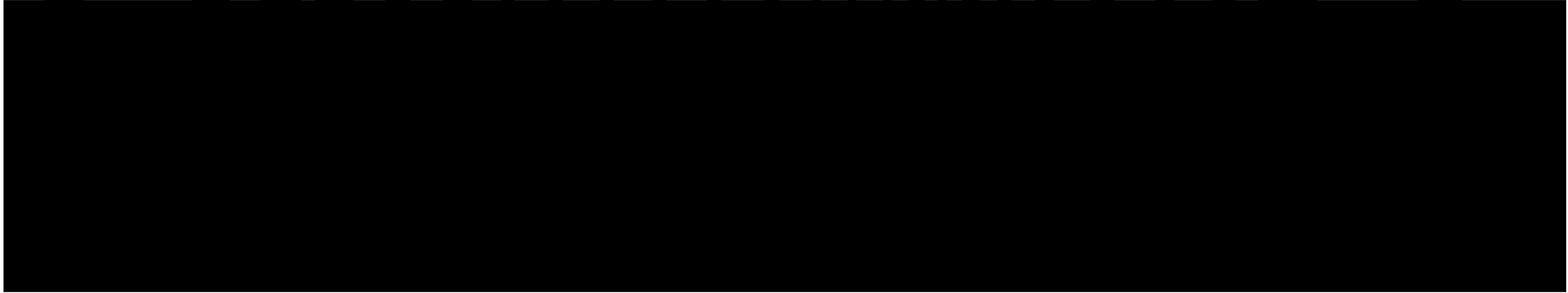
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REDACTED

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REDACTED

Station: Crystal River 4&5

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[REDACTED]																			

REDACTED

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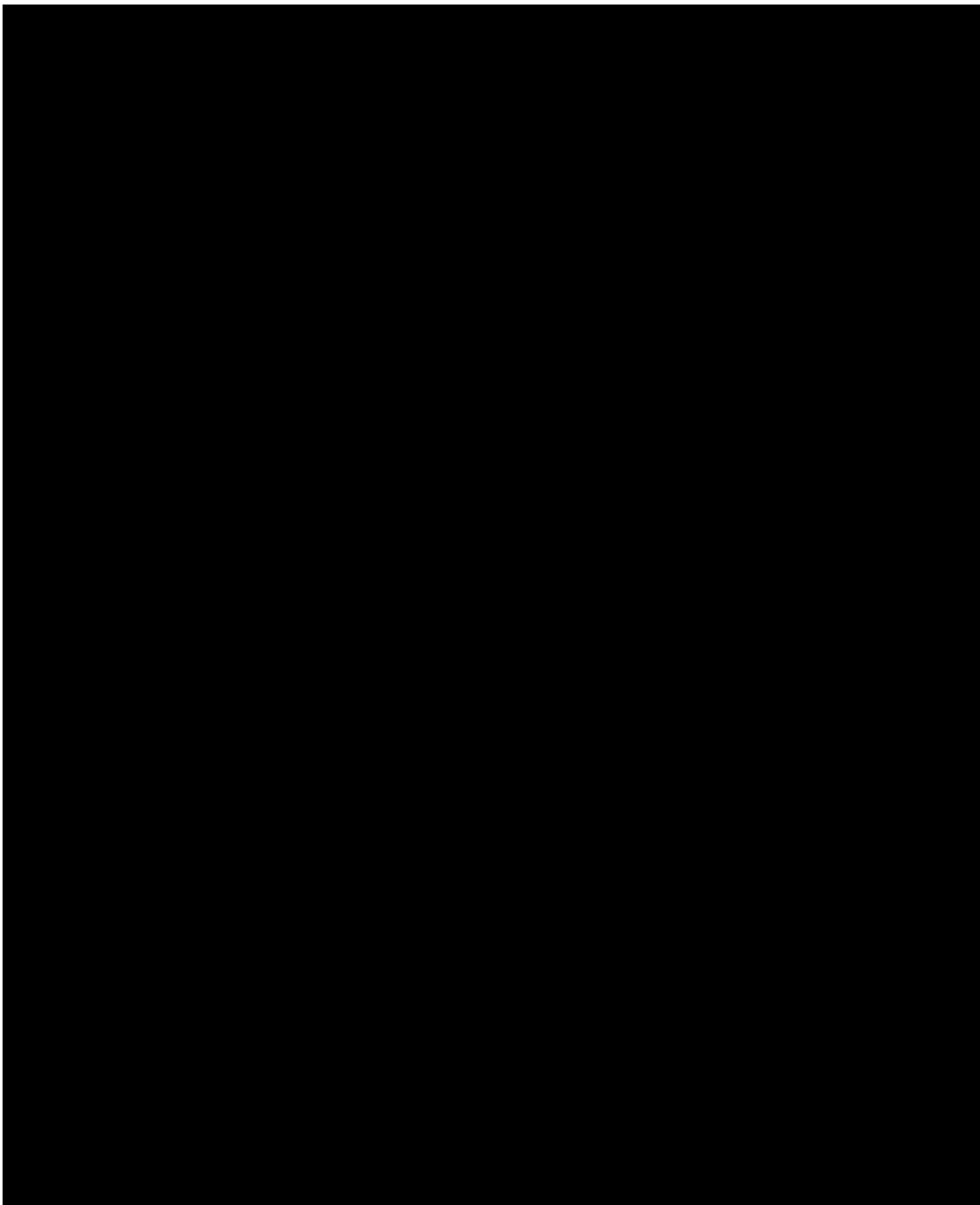
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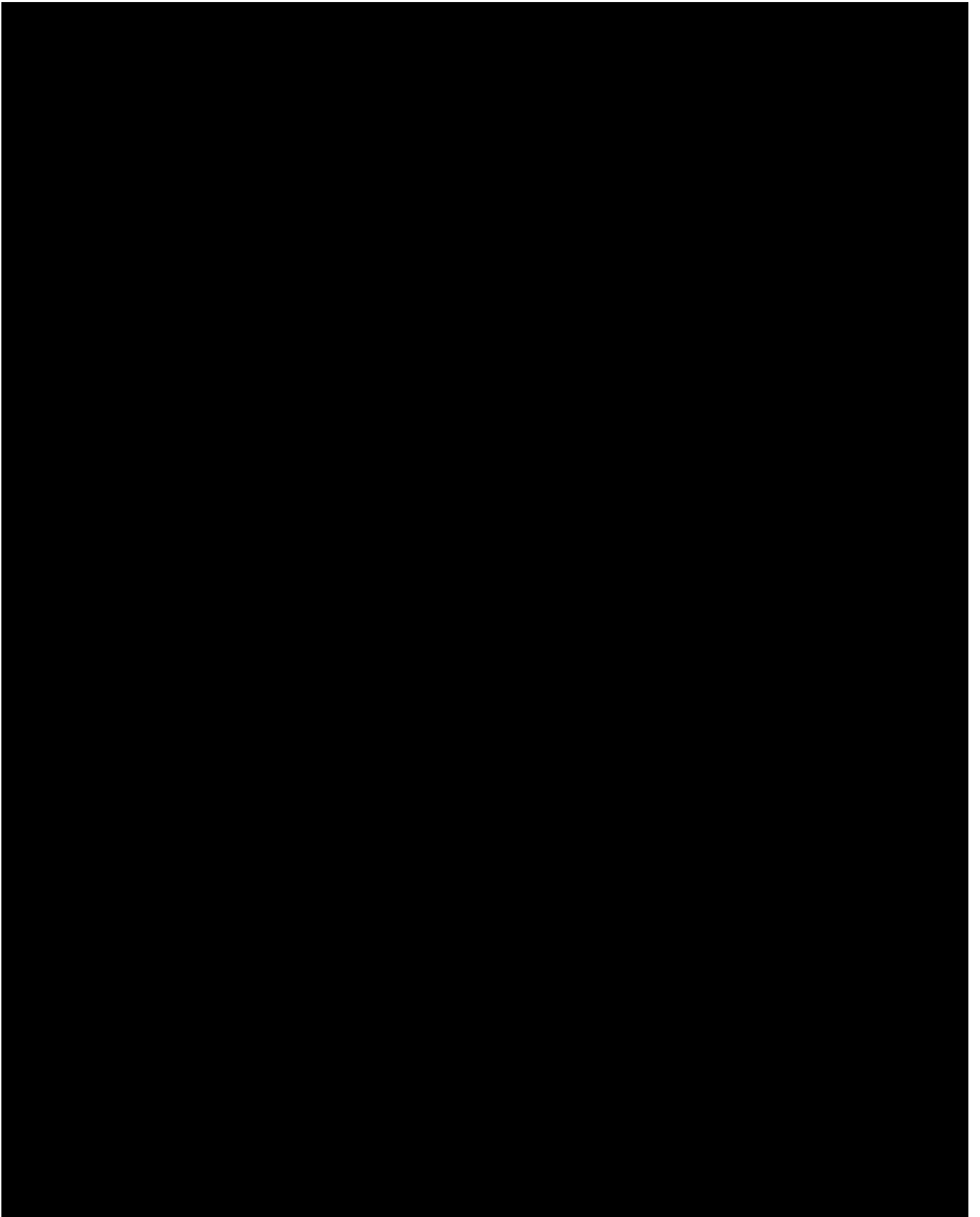
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PS ROG 1-3 DEF-19FL-FUEL

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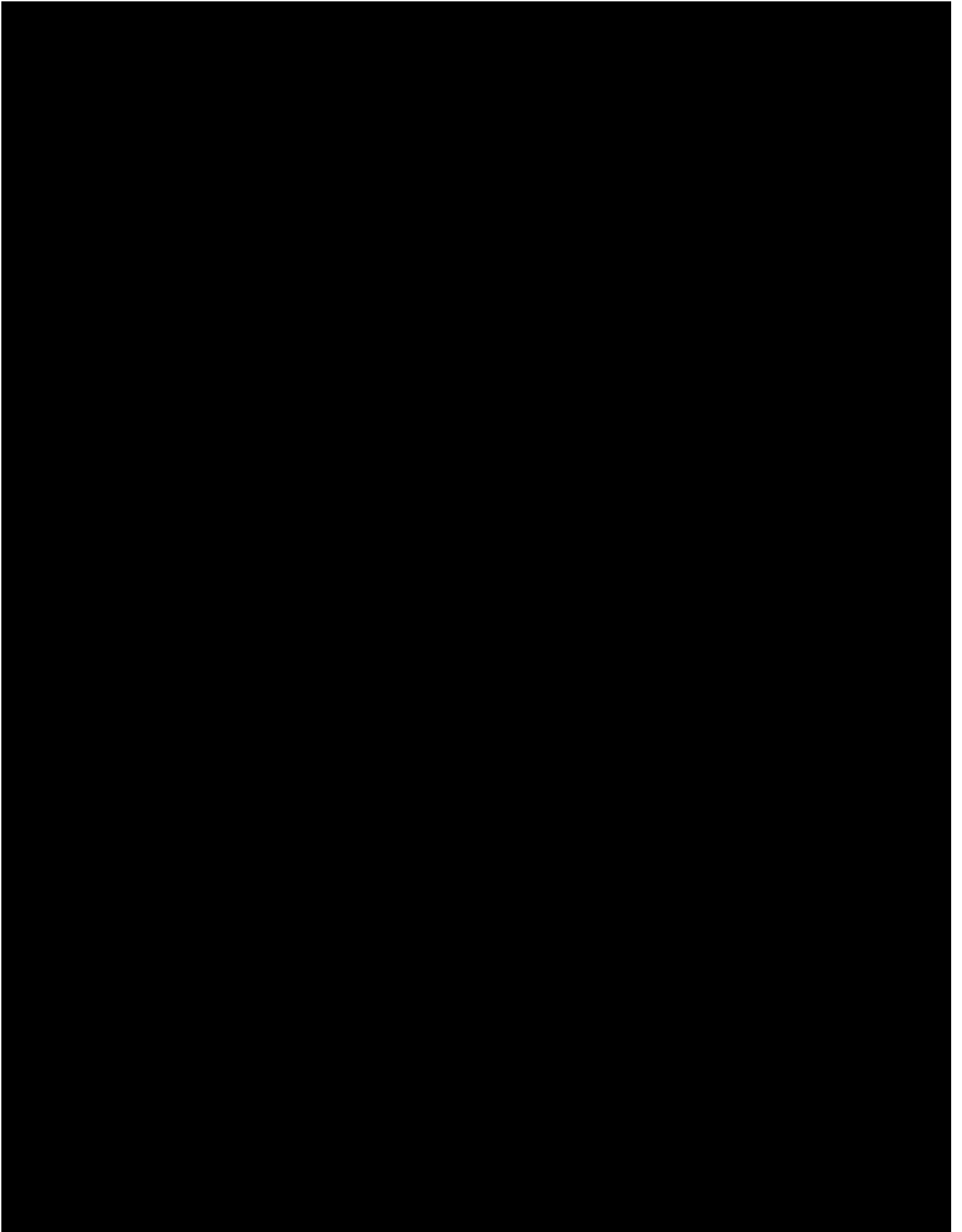


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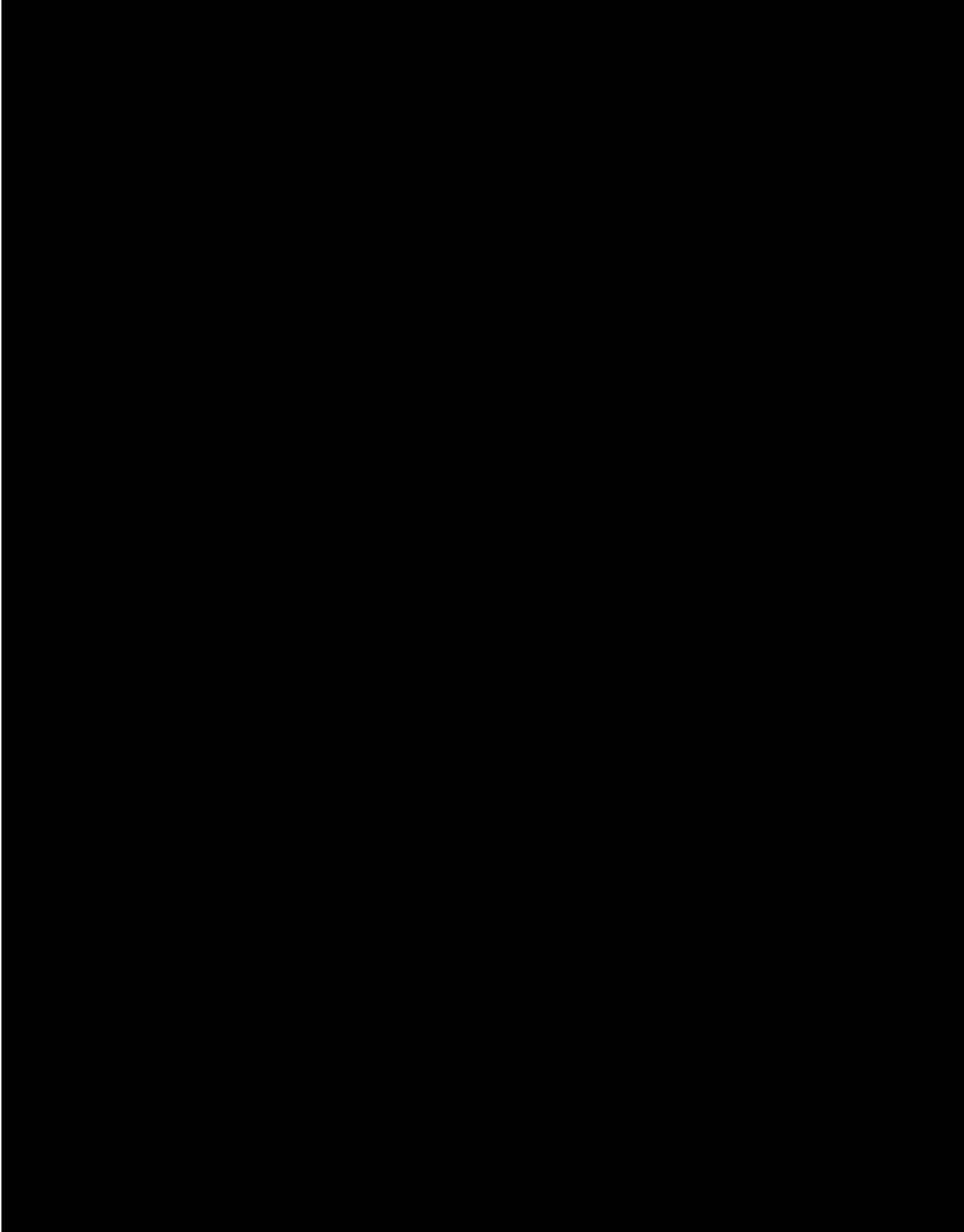
DEF-19FL-FUEL-000007

REDACTED



DEF-19FL-FUEL-000008

REDACTED



Package #1 – Southeast Supply Header’s (“SESH”) Centerpoint, Gulf South, Columbia Gulf, Tiger, Texas Eastern and/or TGP (SESH Locations #83001/#83003/#83004/#83014/#83005/#83008)

Curve date of July 2, 2018 used for evaluation

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**DUKE ENERGY FLORIDA
Confidentiality Justification Matrix**

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
<p>DEF's Response to Staff's First Set of Interrogatories (Nos. 1-8)</p>	<p>Question 1, Attachment bearing bates number DEF-19FL-FUEL-00001: all information contained in columns-Sales Co.; Producer, Start Date, End Date, Rail Barge, Region, May Vol, June, Vol, Jul Vol, No Trains Offered, Btu, Moist%, Ash%, Suf%, /Grd, Vol%, LBS SO2, Price \$/Ton, Total Freight Cost, \$MmBtu Delvd O&M, SO2 Adj & Comments</p> <p>Question 1, Attachment bearing bates number DEF-19FL-FUEL-000002: all information contained in columns: Sales Co., Producer, Start Date, End Date, Rail Barge, Region, Feb Vol, Mar Vol, Apr Vol, May Vol, Jun Vol, Jul Vol, Aug Vol, BTU, Moist %, Ash %, Suf %, Grd, Vol%, AFT, LBS SO2, Offer Price/\$/ton, Total Frgt Cost, Delivered/\$/Ton, \$/MmBtu Delvd/O&M S02 Adj and Comments.</p> <p>Question 1, Attachment bearing bates numbers DEF-19FL-FUEL-000003 through DEF-19FL-FUEL-000004: all information contained in columns: Bid #, Counterparty, Region, Mode, Annual Volume, Btu/lb, SO2/mmBt, Ash %, FOB Point, Mine\$/ton, Transportation \$/ton Barge, Transportation \$/ton Terminal,</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>

	Transportation \$/ton Rail, Other, Delivered \$/ton, Total \$/mmBtu, & Comments.	
DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
DEF's Response to Staff's First Set of Interrogatories (Nos. 1-8)	Question 3, Attachment bearing bates number DEF-19FL-FUEL-00005: all information contained in columns January through Grand Total.	<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>
DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
DEF's Response to Staff's First Set of Interrogatories (Nos. 1-8)	<p>Question 4, Attachment bearing bates number DEF-19FL-FUEL-000006 through DEF-19FL-FUEL-000009 RFP#-DEF-LT-061518 Letter in its entirety.</p> <p>Question 4, Attachment bearing bates number DEF-18FL-FUEL-000010 Analysis dated 061518- list of bids, seller, delivery point, supply source, terms, volume,</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</p>

	pricing, and supplier notes/other in their entirety	competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
DEF's Response to Staff's First Set of Interrogatories (Nos. 1-8)	Question 6 Response: all information after "2018" to the end of the response.	<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 JIM MCCLAY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20190001-EI

Dated: March 20, 2019

**AFFIDAVIT OF JIM MCCLAY IN SUPPORT OF
DUKE ENERGY FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Jim McClay. 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 Director of Trading in the Trading and Dispatch Section of the Fuels and Systems Optimization Department. This group is responsible for the hourly trading, financial hedging activities, oil procurement and natural gas procurement and scheduling needed to support the gas generation needs for the Duke Energy Indiana

("DEI"), Duke Energy Kentucky ("DEK"), Duke Energy Carolinas ("DEC"), Duke Energy Progress ("DEP"), and DEF.

3. As the Director of Trading, I am responsible, along with the other members of the section, for the management of the Southeast power trading, Midwest financial activities, oil procurement and natural gas group procurement, scheduling and hedging activities for the Duke Energy regulated generation fleet.

4. DEF is seeking confidential classification for certain responses to Staff's First Set of Interrogatories (Nos. 1-8), specifically questions 1, 3, 4, 5, and 6, submitted on March 20, 2019. 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 contract for goods or services on favorable terms.

5. DEF negotiates with potential fuel suppliers to obtain competitive contracts for fuel options that provide economic value to DEF and its customers. In order to obtain such contracts, however, DEF must be able to assure fuel suppliers that sensitive business information, such as bid evaluations, pricing, and quantities of fuel, will be kept confidential. With respect to the information at issue in this Request, DEF has kept confidential and has not publicly disclosed confidential information pertaining to the RFP bid evaluations for coal, natural gas, natural gas storage, and light oil. Absent such measures, suppliers would run the risk that sensitive business information that they provided in their bids/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, persons or

companies who otherwise would contract with DEF might decide not to do so if DEF did not keep specific information confidential. Without DEF's measures to maintain the confidentiality of sensitive terms in contracts between DEF and fuel suppliers, the Company's efforts to obtain competitive fuel supply contracts could be undermined.

6. Additionally, the disclosure of confidential information in the RFP bid evaluations, could adversely impact DEF's competitive business interests. If such information was disclosed to DEF's competitors, DEF's efforts to obtain competitive fuel supply options that provide economic value to both DEF and its customers could be compromised by DEF's competitors changing their consumption or purchasing behavior within the relevant markets.

7. Upon receipt of confidential information from fuel 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. 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 _____ day of March, 2019.

(Signature)

Jim McClay
Director – Trading
Fuels and System Optimizing Department
Duke Energy
526 South Church
Charlotte, NC 28202

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this ___ day of March, 2019 by Jim McClay. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

(Signature)

(AFFIX NOTARIAL SEAL)

(Printed Name)

NOTARY PUBLIC, STATE OF _____

(Commission Expiration Date)

(Serial Number, If Any)