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May 22, 2020

VIA ELECTRONIC FILING

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

In re: *Petition by Duke Energy Florida, LLC for Approval of Actual Storm Restoration Costs and Associated Recovery Process Related to Hurricane Michael and Tropical Storm Alberto*; Docket No. 20190110-EI

Dear Mr. Teitzman:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC (“DEF”), DEF’s Third Request for Confidential Classification filed in connection with the information contained within the documents produced with DEF’s response to interrogatory numbers 150 and 151 of Citizens’ Fifth Set of Interrogatories to Duke Energy Florida, LLC (Nos. 150-153). This filing includes the following:

- DEF’s Third Request for Confidential Classification;
- Slip-sheet for confidential Exhibit A;
- Redacted Exhibit B (two copies);
- Exhibit C (justification matrix); and
- Exhibit D (affidavit of Tom Morris).

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 (813) 227-8114 should you have any questions concerning this filing.

Respectfully,

Shutts & Bowen LLP

/s/ Daniel Hernandez

Daniel Hernandez

Enclosure (as noted)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC for limited proceeding for recovery of incremental storm restoration costs related to Hurricane Michael and Tropical Storm Alberto.

Docket No. 20190110-EI

Filed: May 22, 2020

DUKE ENERGY FLORIDA, LLC'S THIRD 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 Third Request for Confidential Classification (the “Request”) for certain information contained within the documents produced with DEF’s response to interrogatory numbers 150 and 151 of Citizens’ Fifth Set of Interrogatories to Duke Energy Florida, LLC (Nos. 150-153) served on April 22, 2020. In support of this Request, DEF states:

1. Portions of the documents produced with DEF’s response to interrogatory numbers 150 and 151 of Citizens’ Fifth Set of Interrogatories to Duke Energy Florida, LLC (Nos. 150-153) are “proprietary confidential business information” under Section 366.093(3), Florida Statutes.

2. The following exhibits are included with this Request:

(a) Sealed **Exhibit A** is a package containing an unredacted copy of the portions of the documents produced with DEF’s response to interrogatory numbers 150 and 151 of Citizens’ Fifth Set of Interrogatories to Duke Energy Florida, LLC (Nos. 150-153), for which DEF seeks confidential treatment. **Exhibit A** is being submitted separately in a sealed envelope

labeled “CONFIDENTIAL.” In the unredacted copy, the information asserted to be confidential is highlighted in yellow.

(b) **Composite Exhibit B** is two copies of the redacted information contained within the documents produced with DEF’s response to interrogatory numbers 150 and 151 of Citizens’ Fifth Set of Interrogatories to Duke Energy Florida, LLC (Nos. 150-153), 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 the page and specific portions of the information contained within the documents produced with DEF’s response to interrogatory numbers 150 and 151 of Citizens’ Fifth Set of Interrogatories to Duke Energy Florida, LLC (Nos. 150-153), the information for which DEF seeks confidential classification and the specific statutory bases for seeking confidential treatment.

(d) **Composite Exhibit D** contains an affidavit attesting to the confidential nature of the information identified in this Request.¹

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 includes the Company’s contractual rate information with third-party vendors. DEF must ensure that sensitive business information such as contractual business information is kept confidential, the disclosure of which would impair the Company’s competitive business advantages. Therefore, the confidential information at issue qualifies for confidential classification. *See* §§ 366.093(3) (d), F.S.; Affidavit of Tom Morris at ¶ 5. If DEF cannot assure contracting parties that it can maintain the confidentiality of

¹Due to the current circumstances with COVID-19, DEF is submitting this Request for Confidential Classification with an Unverified Affidavit. DEF will file a Verified Affidavit as soon as the climate allows.

contractual terms, those parties and other similarly situated parties may forego entering contracts with DEF, which would impair the ability of the Company to negotiate contracts on favorable terms. *See* § 366.093(3)(d) and (e), F.S.; Affidavit of Tom Morris 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 Tom Morris at ¶ 7 and 8. The information has not been disclosed to the public and the Company has treated and continues to treat the information at issue in this Request as confidential. *Id.*

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 eighteen (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 Third Request for Confidential Classification be granted.

DATED this 22nd day of May, 2020.

/s/ Daniel Hernandez
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CERTIFICATE OF SERVICE (DOCKET. NO. 20190110-EI)

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 22nd day of May, 2020, to all parties of record as indicated below.

/s/ Daniel Hernandez
Attorney

<p>Ashley Weisenfeld / Rachael Dziechciarz Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 aweisenf@psc.state.fl.us rdziehc@psc.state.fl.us</p>	<p>J.R. Kelly / Charles J. Rehwinkel Office of Public Counsel c/o The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us rehwinkel.charles@leg.state.fl.us</p>
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Exhibit A

“CONFIDENTIAL”

(submitted under separate cover)

Exhibit B

REDACTED

(two copies)

ROG 150
Distribution
Outside Services per Original filing

Outside Services	\$143,440,456
CONTRACTORS - LINE	\$90,600,346
[REDACTED]	\$31,988,191
[REDACTED]	\$9,857,060
[REDACTED]	\$7,830,227
[REDACTED]	\$7,145,944
[REDACTED]	\$4,365,204
[REDACTED]	\$2,880,809
[REDACTED]	\$2,412,012
[REDACTED]	\$2,403,819
[REDACTED]	\$2,386,107
[REDACTED]	\$2,004,950
[REDACTED]	\$1,787,295
[REDACTED]	\$1,753,205
[REDACTED]	\$1,696,630
[REDACTED]	\$1,452,291
[REDACTED]	\$1,298,685
[REDACTED]	\$1,221,963
[REDACTED]	\$1,099,852
[REDACTED]	\$1,014,378
[REDACTED]	\$963,363
[REDACTED]	\$744,460
[REDACTED]	\$530,165
[REDACTED]	\$488,488
[REDACTED]	\$398,317
[REDACTED]	\$396,307
[REDACTED]	\$395,998
[REDACTED]	\$369,425
[REDACTED]	\$336,861
[REDACTED]	\$313,496
[REDACTED]	\$191,739
[REDACTED]	\$167,718
[REDACTED]	\$137,234
[REDACTED]	\$127,614
[REDACTED]	\$110,992
[REDACTED]	\$102,267
[REDACTED]	\$91,626
[REDACTED]	\$87,005
[REDACTED]	\$25,025
[REDACTED]	\$23,626
CONTRACTORS - STAGING AND LOGISTICS	\$41,411,269
[REDACTED]	\$33,409,099
[REDACTED]	\$6,450,144
[REDACTED]	\$450,792
[REDACTED]	\$344,420
[REDACTED]	\$270,146
[REDACTED]	\$142,830
[REDACTED]	\$79,372
[REDACTED]	\$68,535
[REDACTED]	\$65,730
[REDACTED]	\$36,829
[REDACTED]	\$27,728
[REDACTED]	\$25,392
[REDACTED]	\$21,584
[REDACTED]	\$10,272
[REDACTED]	\$6,350

REDACTED



\$1,485

\$560

CONTRACTORS - TREE TRIMMING

\$9,032,133



\$3,525,465

\$2,716,108

\$1,078,423

\$503,290

\$491,814

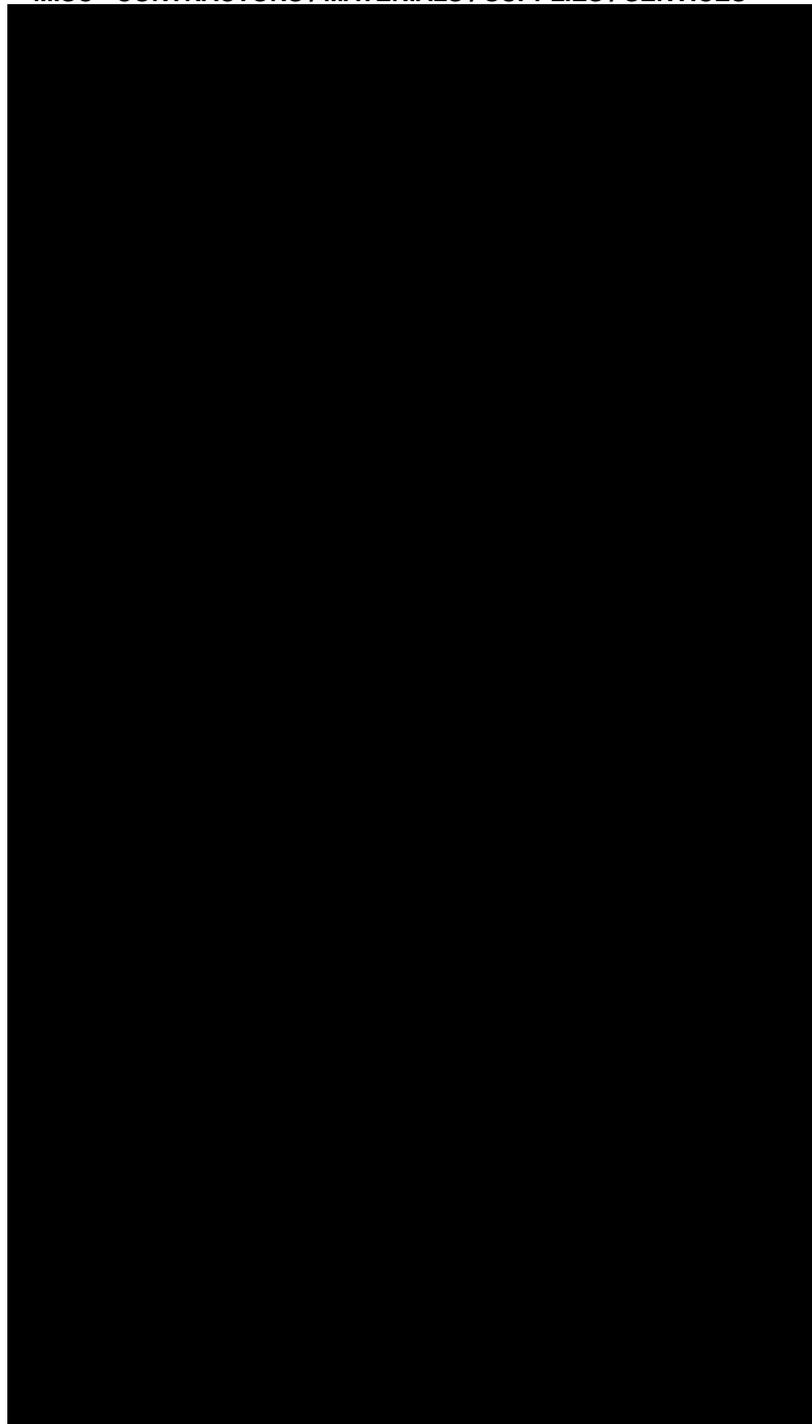
\$430,524

\$195,796

\$90,712

MISC - CONTRACTORS / MATERIALS / SUPPLIES / SERVICES

\$1,675,337



\$545,652

\$499,983

\$368,851

\$121,692

\$32,730

\$28,316

\$16,798

\$13,000

\$5,160

\$4,973

\$4,400

\$4,275

\$3,979

\$3,846

\$3,500

\$3,461

\$3,071

\$2,990

\$1,803

\$1,005

\$940

\$927

\$700

\$600

\$576

\$358

\$307

\$237

\$200

\$176

\$125

\$125

\$97

\$82

\$69

\$60

\$56

\$37

\$36

\$33

\$24

\$22

\$20

\$19

\$13

\$8

\$5

\$3

CONTRACTORS - AVIATION

\$424,724

REDACTED

	\$221,601	
	\$148,562	
	\$54,562	
NOT GROUPED	\$200,048	
No Vendor Name	\$200,048	Relates to Accrual of costs
CONTRACTORS - MATERIALS	\$96,600	
	\$96,600	
Grand Total	\$143,440,456	

See POD 4 for Line Contractors invoices greater than \$25k
See POD 6 for Tree Trimming invoices greater than \$25k
See POD 16 for Staging and Logistics invoices greater than \$10k

ROG 150
Transmission
Outside Services per Original filing

Grouping	Vendor Name	Project		
		Restoration	PX Line	Grand Total
Contractors - Line		758,810	46,663,954	47,422,764
		289,839	44,573,894	44,863,733
		2,370,864		2,370,864
		760,750		760,750
		139,137		139,137
		70,520		70,520
		49,416		49,416
			45,810	45,810
		44,273		44,273
			29,652	29,652
Contractors - Line Total		4,483,608	91,313,310	95,796,918
Contractors - Tree Trimming		1,243,784		1,243,784
		886,662	11,315	897,977
		623,455		623,455
		444,534		444,534
		307,262	6,675	313,937
		258,330		258,330
		235,176		235,176
		118,400		118,400
		98,804		98,804
		51,861	46,762	98,623
		7,790	45,000	52,790
		42,481		42,481
		10,012		10,012
		7,326		7,326
Contractors - Tree Trimming Total		4,335,876	109,751	4,445,627
Staging and Logistics		129,891	468,806	598,697
		132,011	277,685	409,696
		208,293		208,293
		205,870		205,870
			170,500	170,500
		108,114		108,114
		-	80,000	80,000
		74,378		74,378
		65,027	1,594	66,621
			48,500	48,500
			38,448	38,448
		1,403	15,223	16,626
		5,685	4,830	10,515
		10,000		10,000
		2,000		2,000
		1,823		1,823
		161		161
		107		107
Staging and Logistics Total		944,761	1,105,585	2,050,346
Misc Contractors/Materials/Supplies	Remaining estimate for forecasted vendor costs		2,899,254	2,899,254
			1,531,682	1,531,682
			691,849	691,849
		299,098	185,894	484,992
			457,500	457,500
			106,200	106,200
			91,324	91,324
			87,215	87,215
			59,029	59,029
		56,410		56,410
		46,072		46,072
		43,051		43,051

REDACTED

		33,021	1,980	35,002
			27,516	27,516
			26,991	26,991
		24,090		24,090
			17,472	17,472
		17,187		17,187
			14,787	14,787
			14,257	14,257
			13,380	13,380
			10,800	10,800
			10,795	10,795
		10,000		10,000
		8,120		8,120
			3,800	3,800
		2,558		2,558
		1,620		1,620
		1,125		1,125
		1,119		1,119
		980		980
			958	958
			878	878
			700	700
			700	700
		664		664
			591	591
			450	450
		414		414
			377	377
		268		268
		215		215
		188	0	188
		147		147
			118	118
		100		100
		75		75
		53		53
		52		52
		49		49
		45		45
		25		25
		17		17
	Misc Adjustments		(38,329)	(38,329)
Misc Contractors/Materials/Supplies Total		546,764	6,218,168	6,764,932
Grand Total		10,311,009	98,746,815	109,057,823

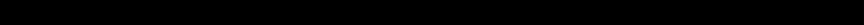
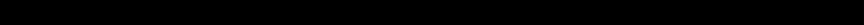
See POD 4 for Line Contractors invoices greater than \$25k
 See POD 6 for Tree Trimming invoices greater than \$25k
 See POD 16 for Staging and Logistics invoices greater than \$10k

Customer Services
Hurricane Michael - DEF
Outside Services

Category	Vendor Name JD	Invoice ID	Grand Total	Note
Contractor Costs	[REDACTED]	[REDACTED]	5,845.23	
			12,067.44	
			51.38	
			51.38	
			3,480.36	
			123,470.61	Move to DEF Storm Michael-45%
			144,966.40	

REDACTED

ROG 151
Distribution
Employee Expense per Original filing

DISTRIBUTION EMPLOYEE EXPENSE	
CONTRACTORS - STAGING AND LOGISTICS	
	\$ 5,067,851
	\$ 26,166
	\$ 35,812
MISC - CONTRACTORS / MATERIALS / SUPPLIES / SERVICES	
	\$ 4,850
Expense Reports / Miscellaneous	\$ 608,100
	<u>\$ 5,742,779</u>

See POD 8 for expense report details that exceeded \$7,500

REDACTED

ROG 151
 Transmission
 Employee Expense per Original filing

Category	Grouping	Vendor Name JD	Restoration	PX Line	Total
Other Employee Expenses	Staging and Logistics		295,294	36,691	331,985
			3,276,444	-	3,276,444
			-	20,304	20,304
			1,117,463	-	1,117,463
	Staging and Logistics Total		4,689,200	56,995	4,746,196
	Misc Contractors/Materials/Supplies		92,946	-	92,946
	Misc Contractors/Materials/Supplies Total		92,946	-	92,946
	Expense Reports / Miscellaneous		207,408	389,007	596,415
	Expense Reports / Miscellaneous Total		207,408	389,007	596,415
Other Employee Expenses Total			4,989,555	446,002	5,435,556

See POD 8 for expense report details that exceeded \$7,500

ROG 150
Distribution
Outside Services per Original filing

Outside Services	\$143,440,456
CONTRACTORS - LINE	\$90,600,346
[REDACTED]	\$31,988,191
[REDACTED]	\$9,857,060
[REDACTED]	\$7,830,227
[REDACTED]	\$7,145,944
[REDACTED]	\$4,365,204
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[REDACTED]	\$2,403,819
[REDACTED]	\$2,386,107
[REDACTED]	\$2,004,950
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[REDACTED]	\$1,753,205
[REDACTED]	\$1,696,630
[REDACTED]	\$1,452,291
[REDACTED]	\$1,298,685
[REDACTED]	\$1,221,963
[REDACTED]	\$1,099,852
[REDACTED]	\$1,014,378
[REDACTED]	\$963,363
[REDACTED]	\$744,460
[REDACTED]	\$530,165
[REDACTED]	\$488,488
[REDACTED]	\$398,317
[REDACTED]	\$396,307
[REDACTED]	\$395,998
[REDACTED]	\$369,425
[REDACTED]	\$336,861
[REDACTED]	\$313,496
[REDACTED]	\$191,739
[REDACTED]	\$167,718
[REDACTED]	\$137,234
[REDACTED]	\$127,614
[REDACTED]	\$110,992
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[REDACTED]	\$91,626
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[REDACTED]	\$6,450,144
[REDACTED]	\$450,792
[REDACTED]	\$344,420
[REDACTED]	\$270,146
[REDACTED]	\$142,830
[REDACTED]	\$79,372
[REDACTED]	\$68,535
[REDACTED]	\$65,730
[REDACTED]	\$36,829
[REDACTED]	\$27,728
[REDACTED]	\$25,392
[REDACTED]	\$21,584
[REDACTED]	\$10,272
[REDACTED]	\$6,350

REDACTED



\$1,485

\$560

CONTRACTORS - TREE TRIMMING

\$9,032,133



\$3,525,465

\$2,716,108

\$1,078,423

\$503,290

\$491,814

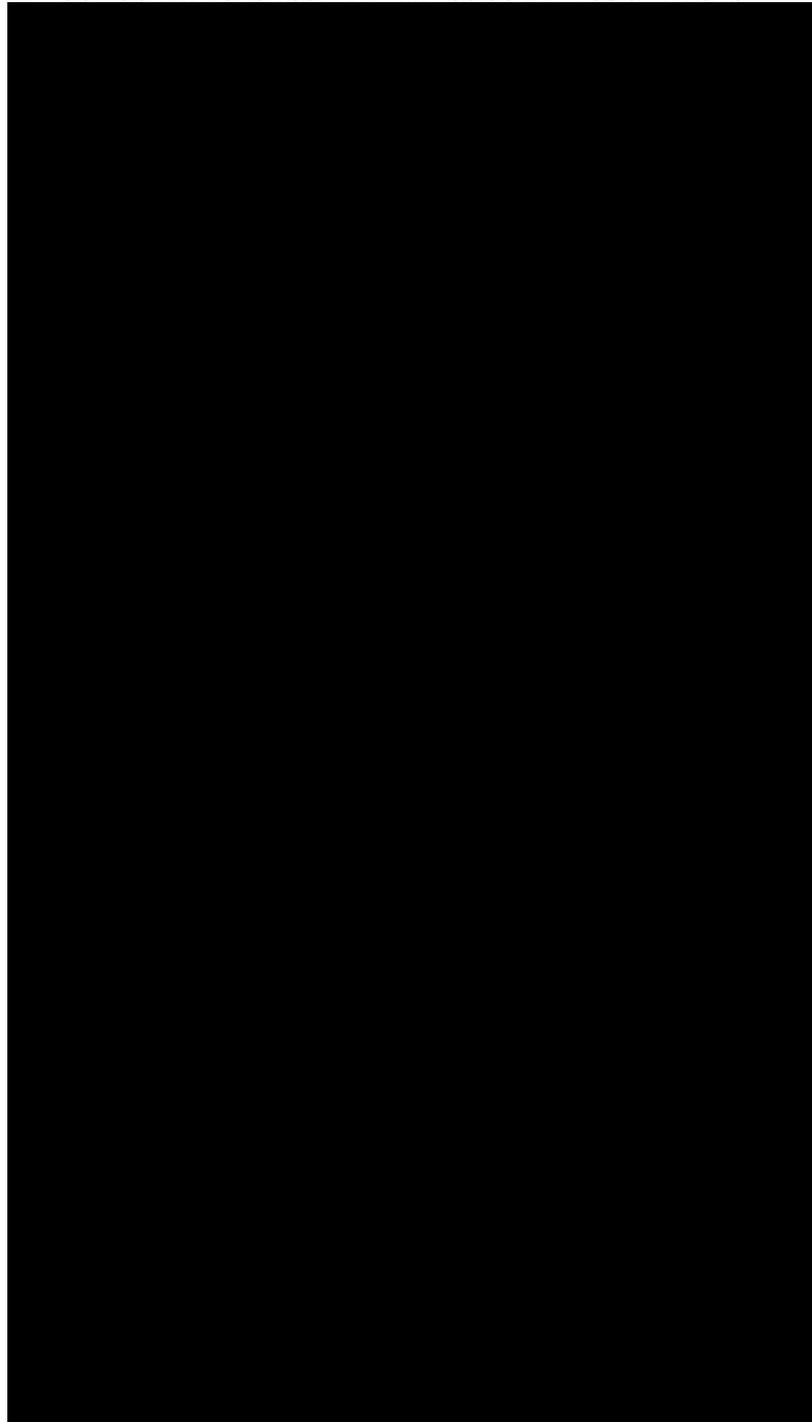
\$430,524

\$195,796

\$90,712

MISC - CONTRACTORS / MATERIALS / SUPPLIES / SERVICES

\$1,675,337



\$545,652

\$499,983

\$368,851

\$121,692

\$32,730

\$28,316

\$16,798

\$13,000

\$5,160

\$4,973

\$4,400

\$4,275

\$3,979

\$3,846

\$3,500

\$3,461

\$3,071

\$2,990

\$1,803

\$1,005

\$940

\$927

\$700

\$600

\$576

\$358

\$307

\$237

\$200

\$176

\$125

\$125

\$97

\$82

\$69

\$60

\$56

\$37

\$36

\$33

\$24

\$22

\$20

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\$5

\$3

CONTRACTORS - AVIATION

\$424,724

REDACTED

	\$221,601	
	\$148,562	
	\$54,562	
NOT GROUPED	\$200,048	
No Vendor Name	\$200,048	Relates to Accrual of costs
CONTRACTORS - MATERIALS	\$96,600	
	\$96,600	
Grand Total	\$143,440,456	

See POD 4 for Line Contractors invoices greater than \$25k
See POD 6 for Tree Trimming invoices greater than \$25k
See POD 16 for Staging and Logistics invoices greater than \$10k

ROG 150
Transmission
Outside Services per Original filing

Grouping	Vendor Name	Project		
		Restoration	PX Line	Grand Total
Contractors - Line		758,810	46,663,954	47,422,764
		289,839	44,573,894	44,863,733
		2,370,864		2,370,864
		760,750		760,750
		139,137		139,137
		70,520		70,520
		49,416		49,416
			45,810	45,810
		44,273		44,273
			29,652	29,652
Contractors - Line Total		4,483,608	91,313,310	95,796,918
Contractors - Tree Trimming		1,243,784		1,243,784
		886,662	11,315	897,977
		623,455		623,455
		444,534		444,534
		307,262	6,675	313,937
		258,330		258,330
		235,176		235,176
		118,400		118,400
		98,804		98,804
		51,861	46,762	98,623
		7,790	45,000	52,790
		42,481		42,481
		10,012		10,012
		7,326		7,326
Contractors - Tree Trimming Total		4,335,876	109,751	4,445,627
Staging and Logistics		129,891	468,806	598,697
		132,011	277,685	409,696
		208,293		208,293
		205,870		205,870
			170,500	170,500
		108,114		108,114
		-	80,000	80,000
		74,378		74,378
		65,027	1,594	66,621
			48,500	48,500
			38,448	38,448
		1,403	15,223	16,626
		5,685	4,830	10,515
		10,000		10,000
		2,000		2,000
		1,823		1,823
		161		161
		107		107
Staging and Logistics Total		944,761	1,105,585	2,050,346
Misc Contractors/Materials/Supplies	Remaining estimate for forecasted vendor costs		2,899,254	2,899,254
			1,531,682	1,531,682
			691,849	691,849
		299,098	185,894	484,992
			457,500	457,500
			106,200	106,200
			91,324	91,324
			87,215	87,215
			59,029	59,029
		56,410		56,410
		46,072		46,072
		43,051		43,051

REDACTED

		33,021	1,980	35,002
			27,516	27,516
			26,991	26,991
		24,090		24,090
			17,472	17,472
		17,187		17,187
			14,787	14,787
			14,257	14,257
			13,380	13,380
			10,800	10,800
			10,795	10,795
		10,000		10,000
		8,120		8,120
			3,800	3,800
		2,558		2,558
		1,620		1,620
		1,125		1,125
		1,119		1,119
		980		980
			958	958
			878	878
			700	700
			700	700
		664		664
			591	591
			450	450
		414		414
			377	377
		268		268
		215		215
		188	0	188
		147		147
			118	118
		100		100
		75		75
		53		53
		52		52
		49		49
		45		45
		25		25
		17		17
	Misc Adjustments		(38,329)	(38,329)
Misc Contractors/Materials/Supplies Total		546,764	6,218,168	6,764,932
Grand Total		10,311,009	98,746,815	109,057,823

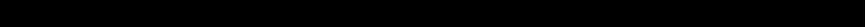
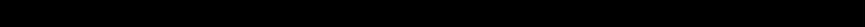
See POD 4 for Line Contractors invoices greater than \$25k
 See POD 6 for Tree Trimming invoices greater than \$25k
 See POD 16 for Staging and Logistics invoices greater than \$10k

Customer Services
Hurricane Michael - DEF
Outside Services

Category	Vendor Name JD	Invoice ID	Grand Total	Note
Contractor Costs	[REDACTED]	[REDACTED]	5,845.23	
			12,067.44	
			51.38	
			51.38	
			3,480.36	
			123,470.61	Move to DEF Storm Michael-45%
			144,966.40	

REDACTED

ROG 151
Distribution
Employee Expense per Original filing

DISTRIBUTION EMPLOYEE EXPENSE	
CONTRACTORS - STAGING AND LOGISTICS	
	\$ 5,067,851
	\$ 26,166
	\$ 35,812
MISC - CONTRACTORS / MATERIALS / SUPPLIES / SERVICES	
	\$ 4,850
Expense Reports / Miscellaneous	\$ 608,100
	<u>\$ 5,742,779</u>

See POD 8 for expense report details that exceeded \$7,500

REDACTED

ROG 151
 Transmission
 Employee Expense per Original filing

Category	Grouping	Vendor Name JD	Restoration	PX Line	Total
Other Employee Expenses	Staging and Logistics		295,294	36,691	331,985
			3,276,444	-	3,276,444
			-	20,304	20,304
			1,117,463	-	1,117,463
	Staging and Logistics Total		4,689,200	56,995	4,746,196
	Misc Contractors/Materials/Supplies		92,946	-	92,946
	Misc Contractors/Materials/Supplies Total		92,946	-	92,946
	Expense Reports / Miscellaneous		207,408	389,007	596,415
	Expense Reports / Miscellaneous Total		207,408	389,007	596,415
Other Employee Expenses Total			4,989,555	446,002	5,435,556

See POD 8 for expense report details that exceeded \$7,500

Exhibit C

DUKE ENERGY FLORIDA, LLC Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
<p>DEF’s Response to Citizen’s Fifth Set of Interrogatories (Nos. 150-153); specifically, interrogatory number 150</p>	<p>Response to ROG No. 150 –</p> <p>Document bearing Bates number 20190110-DEF-OPCROG5-150-000001:</p> <p>All information in the column under the row titled “Contractors – Line”;</p> <p>All information in the column under the row titled “Contractors – Staging and Logistics”;</p> <p>All information in the column under the row titled “Contractors – Tree Trimming”;</p> <p>All information in the column under the row titled “Misc – Contractors / Materials / Supplies / Services”;</p> <p>All information in the column under the row titled “Contractors – Aviation”; and</p> <p>All information in the column under the row titled “Contractors – Materials.”</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, the disclosure of which would impair DEF’s competitive interests.</p>
<p>DEF’s Response to Citizen’s Fifth Set of Interrogatories (Nos. 150-153); specifically, interrogatory number 150</p>	<p>Response to ROG No. 150 –</p> <p>Document bearing Bates number 20190110-DEF-OPCROG5-150-000002: All information under the column</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</p>

	<p>titled "Vendor Name" before the row titled "Misc Adjustments"</p>	<p>services on favorable terms.</p> <p>§366.093(3)(e), F.S. The document in question contains confidential information, the disclosure of which would impair DEF's competitive interests.</p>
<p>DEF's Response to Citizen's Fifth Set of Interrogatories (Nos. 150-153); specifically, interrogatory number 150</p>	<p>Response to ROG No. 150 –</p> <p>Document bearing Bates number 20190110-DEF-OPCROG5-150-000003:</p> <p>All information under the column titled "Vendor Name ID"; and</p> <p>All information under the column titled "Invoice ID."</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, the disclosure of which would impair DEF's competitive interests.</p>
<p>DEF's Response to Citizen's Fifth Set of Interrogatories (Nos. 150-153); specifically, interrogatory number 151</p>	<p>Response to ROG No. 151 –</p> <p>Document bearing Bates number 20190110-DEF-OPCROG5-151-000001:</p> <p>All information in the column under the row titled "Contractors – Staging and Logistics"; and</p> <p>All information in the column under the row titled "Misc – Contractors / Materials / Supplies / Services."</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, the disclosure of which would impair DEF's competitive interests.</p>
<p>DEF's Response to Citizen's Fifth Set of Interrogatories (Nos. 150-153); specifically, interrogatory number 151</p>	<p>Response to ROG No. 151 –</p> <p>Document bearing Bates number 20190110-DEF-OPCROG5-151-000002:</p>	<p>§366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF's</p>

	All information under the column titled "Vendor name ID"	efforts to contract for goods or services on favorable terms. §366.093(3)(e), F.S. The document in question contains confidential information, the disclosure of which would impair DEF's competitive interests.
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Exhibit D

AFFIDAVIT OF TOM MORRIS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC for limited proceeding for recovery of incremental storm restoration costs related to Hurricane Michael and Tropical Storm Alberto.

Docket No. 20190110-EI

Filed: May 22, 2020

**AFFIDAVIT OF TOM MORRIS IN SUPPORT OF
DUKE ENERGY FLORIDA, LLC'S THIRD REQUEST FOR
CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF _____

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

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

2. I am the Director of Customer Delivery Florida Finance for the Company.

3. As the Director, I am responsible for the overall management and coordination of activities for Distribution Operations. I also oversee several employees and I ensure that such employees provide budgeting and forecasting, and expense and capital accounting for Distribution Operations among other responsibilities.

4. DEF is seeking the confidential classification for certain information contained within portions of portions of the documents produced with DEF's response to interrogatory

numbers 150 and 151 of Citizens' Fifth Set of Interrogatories to Duke Energy Florida, LLC (Nos. 150-153). The confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Justification Matrix attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this information because it contains competitively sensitive confidential information concerning contractual business information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.

5. The confidential information at issue relates to proprietary confidential business information including the Company's contractual rate information with third-party vendors. The disclosure of such information would impair the Company's competitive business advantages. Therefore, the confidential information at issue qualifies for confidential classification.

6. 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 impair the Company to negotiate such contracts on favorable terms.

7. The information identified as Exhibit A is intended to be and is treated as confidential by the Company. With respect to the information at issue in DEF's Request, such information has not been disclosed to the public, and the Company has treated and continues to treat such information as confidential.

8. Upon receipt of 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 information in question has the Company publicly disclosed that information.

The Company has treated and continues to treat the information at issue as confidential.

9. This concludes my affidavit.

FURTHER AFFIANT SAYETH NOT.

Dated the ____ day of _____, 2020.

Tom Morris
(address)

The foregoing instrument was sworn to and subscribed before me, by means of physical presence or online notarization, this ____ day of _____, 2020, by Tom Morris. He is personally known to me, or has produced his ____ driver's license, ____ or his _____ as identification, and who states that the foregoing answers are true and correct to the best of his information and belief.

Signature

Printed Name

NOTARY PUBLIC, STATE OF _____

Commission Expiration Date

(AFFIX NOTARY SEAL)