



Matthew R. Bernier
ASSOCIATE GENERAL COUNSEL

October 30, 2020

VIA ELECTRONIC FILING

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

Re: *Duke Energy Florida, LLC: Undocketed —Financial impacts on utility customers as a result of the COVID-19 pandemic.*

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 DEF’s Response to Staff’s Request for financial impacts on utility customers as a result of the COVID-19 pandemic, on October 30, 2020.

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 Lesley Quick)

DEF’s confidential Exhibit A (titled as “Attachment B”) that accompanies the above-referenced filing, has been submitted under separate cover.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me at (850) 521-1428.

Sincerely,

s/ Matthew R. Bernier

Matthew R. Bernier

MRB/cmw
Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Financial impacts on utility
Customers as a result of the COVID-19
Pandemic

Docket No. Undocketed

Filed: October 30, 2020

**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 DEF’s Response to Staff’s Request for financial impacts on utility customers as a result of the COVID-19 pandemic, filed in the undocketed on October 30, 2020. This Request is timely. *See* Rule 25-22.006(3)(a)1., F.A.C. In support of this Request, DEF states:

1. Information contained in DEF’s Response to Staff’s Request for financial impacts on utility customers as a result of the COVID-19 pandemic. Specifically, the document provided in response to Staff’s request to provide DEF’s updated COVID-related policies related to past-due accounts, payment arrangements, late payment waivers, disconnection and reconnection, contains “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 the documents for which DEF seeks confidential treatment. Composite Exhibit A was submitted separately and labeled “CONFIDENTIAL” on October 30, 2020 (titled “Attachment B”). In the unredacted version, the information asserted to be confidential

is highlighted in 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.

(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 in DEF’s response to Staff’s request to provide DEF’s current COVID-related policies related to past-due accounts, payment arrangements, late payment waivers, disconnection and reconnection. DEF is requesting confidential classification of this information because it contains sensitive, current COVID-related internal policies and procedures of the Company, the disclosure of which could impair the efforts of the Company to protect internal business information. *See* § 366.093(3)(c), F.S.; Affidavit of Lesley Quick at ¶ 3, 4. 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 Lesley Quick at ¶ 4, 5. DEF has kept

confidential and has not publicly disclosed confidential information such as the current payment arrangement extension terms or current COVID-related internal policies and procedures. *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 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 30th day of October, 2020.

s/Matthew R. Bernier

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Exhibit A

CONFIDENTIAL

**FILED ON OCTOBER 30, 2020
UNDER SEPARATE COVER**

Docket No. Undocketed

Duke Energy Florida, LLC

DEF's Response to Staff's Request for financial impacts
on utility customers as a result of the COVID-19 pandemic

REDACTED

Customer Impact Data Related to COVID-19

Utility: DUKE ENERGY FLORIDA, LLC

Reporting Month: SEPTEMBER

The report should include data as of the last day of reporting month and is due by the last day of the following month

Delinquent Accounts				
Number of Accounts 60 -89 days past due	Reporting Month		Prior Year Month	
	Total Disconnections	% of Total Customers	Total Disconnections	% of Total Customers
Residential	19,648	1.18%	13,103	0.81%
Commercial / Industrial	1,429	0.68%	854	0.41%
Number of Accounts 90+ days past due	Reporting Month		Prior Year Month	
	Total Disconnections	% of Total Customers	Total Disconnections	% of Total Customers
Residential	28,520	1.71%	8,827	0.54%
Commercial / Industrial	2,115	1.01%	492	0.24%

Amount in Arrears*		
Amount 60 -89 days past due	Reporting Month	Prior Year Month
Residential	\$7,016,820	\$1,284,623
Commercial / Industrial	\$1,489,853	\$388,138
Amount 90+ days past due	Reporting Month	Prior Year Month
Residential	\$8,789,498	\$587,161
Commercial / Industrial	\$2,013,598	\$227,230

*Balances under a payment arrangement are excluded from arrears balances

Payment Arrangements		
Number of New Payment Arrangements	Reporting Month	March 2020 through Current (cumulative)
Residential	23,032	60,248
Commercial / Industrial	809	1,968
Average Duration of New Payment Arrangement	Reporting Month	-----
Residential	6.36 months	-----
Commercial / Industrial	6.29 months	-----
Percent of Customers Under a Payment Arrangement	Reporting Month	-----
Residential ¹	3.01%	-----
Commercial / Industrial ²	0.79%	-----

¹ Number of residential customers under a payment arrangement/total number of residential

² Number of commercial-industrial customers under a payment arrangement/total number of commercial-industrial customers.

Bad Debt		
Incremental Bad Debt	Reporting Month	March 2020 through Current (cumulative)
Incremental Bad Debt ³	\$698,078	\$5,431,540

³ Difference between reporting month and the average of the same month for the prior three years; excluding any prior months that were impacted by named hurricanes. If a prior month is excluded, provide an explanation.

September 2017 is excluded from the calculation of the averages due to Hurricane Irma.

Late Fees		
Number of Assessed Late Fees	Reporting Month	Prior Year Month
Residential	\$0	\$0
Commercial / Industrial	\$0	\$0

Discontinuance of Service				
Number of Customers who received a Notice of Discontinuance of Service ⁴	Reporting Month		Prior Year Month	
	Total Notices	% of Total Customers	Total Notices	% of Total Customers
Residential	278,148	16.70%	301,753	18.54%
Commercial / Industrial	28,751	13.76%	26,798	12.96%

⁴ Total Notices reported reflects the cumulative number of notices sent to customers during the reporting period and does not reflect the number of delinquent customers as of report month end.

Number of Customers Disconnected from Service	Reporting Month		Prior Year Month	
	Total Disconnections	% of Total Customers	Total Disconnections	% of Total Customers
Residential	18	0.001%	14,867	0.91%
Commercial / Industrial	593	0.28%	764	0.37%
Number of Customers Reconnected to Service	Reporting Month		Prior Year Month	
	Total Reconnections	% of Total Customers	Total Reconnections	% of Total Customers
Residential	16	0.001%	12,903	0.79%
Commercial / Industrial	381	0.18%	614	0.30%

Customer Communications		
Communications (Please Note: this excludes communications made via non-traditional channels such as local government presentations, word-of-mouth, marquee banners, etc.)	Reporting Month	March 2020 through Current (cumulative)
Customer-wide COVID-related mass communications (paper, email, phone calls, social media, etc.)	4,208,834	29,737,858
Targeted Covid-related communications to individual customers (paper, email, phone calls, text, etc.)	335,469	927,462

Customer Communications	
<i>Please provide the following two responses starting in October 2020, and all subsequent filings</i>	
Please provide samples of any new communication/media notices provided to customers concerning the utility's past-due accounts / payment arrangements / late payment waivers / disconnection / reconnection policies issued within the last 30-days.	
In the past 30-days, has the utility made changes to, or implemented new, policies related to past-due accounts / payment arrangements / late payment waivers / disconnection / reconnection? If so, please explain.	

Docket No. Undocketed
Duke Energy Florida, LLC
DEF's Response to Staff's Request for financial impacts
on utility customers as a result of the COVID-19 pandemic
Titled "Attachment B"

REDACTED

The document titled "Attachment B" is redacted in its entirety.

Docket No. Undocketed
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Docket No. Undocketed

Duke Energy Florida, LLC

DEF's Response to Staff's Request for financial impacts
on utility customers as a result of the COVID-19 pandemic
Titled "Attachment B"

REDACTED

The document titled "Attachment B" is redacted in its entirety.

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
DEF's Response to Staff's request to provide DEF's current COVID-related policies related to past-due accounts, payment arrangements, late payment waivers, disconnection and reconnection	Located under the heading, "Customer Communications" at the end of the page in its entirety The responsive document, titled "Attachment B," is confidential in its entirety.	§366.093(3)(c), F.S. The document in question contains confidential information, the disclosure of which would impair the interests of both DEF and its customers.

Exhibit D

AFFIDAVIT OF LESLEY QUICK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Financial impacts on utility
Customers as a result of the COVID-19
Pandemic

Docket No. Undocketed
Filed: October 30, 2020

**AFFIDAVIT OF LESLEY QUICK IN SUPPORT
OF DUKE ENERGY FLORIDA, LLC's
REQUEST OF CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Lesley Quick. 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 Request for Confidential Classification. The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Vice President Strategic Planning, Governance & Technology within Customer Services in North Carolina. I am responsible for providing direction and leadership in the development of organizational business plans to ensure alignment and achievement of objectives, regulatory compliance and reporting, key performance indicators and operational metrics. My major duties and responsibilities include the oversight, leadership, integration and implementation of strategic business planning

governance, change management, audit and compliance, technology support, and Consumer Affairs within Customer Services.

3. DEF is seeking confidential classification for certain information contained in the document provided in response to Staff's Request for financial impacts on utility customers as a result of the COVID-19 pandemic. The confidential information at issue is contained in confidential Exhibit A, filed contemporaneously with DEF's Notice of Intent on September 30, 2020 (titled in the NOI as "Attachment B"), 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 confidential information.

DEF is requesting confidential classification of this information because it contains sensitive current COVID-related internal policies and procedures of the Company, the disclosure of which could impair the efforts of the Company to protect internal business information.

4. DEF establishes and maintains internal policies and procedures. DEF must ensure that its sensitive, proprietary business information, such as internal policies and procedures and payment arrangements with customers, 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 such as the payment arrangement extension terms or COVID-related internal policies and procedures. Absent such measures, it could affect customers' behaviors pertaining to payment arrangement programs and how they do business with DEF. Without DEF's measures to maintain the confidentiality of its COVID-related internal policies and procedures, the Company would impair the interests of both DEF and its customers.

5. Upon receipt of confidential information from customers, and with its own confidential information, strict procedures are established and followed to maintain the confidentiality of the Company's policies and procedures, including restricting access to those persons who need the information to assist the Company and its customers. 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.

6. This concludes my affidavit.

Further affiant sayeth not.

Dated the 30th day of October, 2020.

(Signature)

Lesley Quick
VP Strategic Planning, Governance & Technology
Duke Energy
400 South Tryon
Charlotte, NC 28202

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this ____ day of October, 2020 by Lesley Quick. She is personally known to me, or has produced her _____ driver's license, or her _____ as identification.

(Signature)

(AFFIX NOTARIAL SEAL)

(Printed Name)

NOTARY PUBLIC, STATE OF _____

(Commission Expiration Date)

(Serial Number, If Any)