



Dianne M. Triplett
Deputy General Counsel

November 18, 2020

VIA ELECTRONIC FILING

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

Re: *Petition for a limited proceeding to approve Clean Energy Connection Program and Tariff and Stipulation by Duke Energy Florida, LLC; Docket No. 20200176-EI*

Dear Mr. Teitzman:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF"), DEF's Request for Confidential Classification for certain information provided in response to Staff's Second Set of Interrogatories (Nos. 4-26), specifically, DEF's response to Staff's Second Set of Interrogatories number 8(a) and the attached file in response to Staff's Second Set of Interrogatories number 10(b), bearing Bates Numbers 20FL-CEC-002048 - 20FL-CEC-002049. 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 Benjamin Borsch)

DEF's confidential Exhibit A that accompanies the above-referenced filing was submitted with DEF's Notice of Intent to Request Confidential Classification on October 29, 2020, under separate cover (DN 11610-2020 and DN 11616-2020).

Thank you for your assistance in this matter. Please feel free to call me at (727) 820-4692 should you have any questions concerning this filing.

Respectfully,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/cmw
Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for a limited proceeding to approve
Clean Energy Connection Program and Tariff and
Stipulation by Duke Energy Florida, LLC

Docket No. 20200176-EI

Filed: November 18, 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 Second Set of Interrogatories (Nos. 4-26), specifically, the response to Staff’s Second Set of Interrogatories number 8(a) contains confidential proprietary business information relating to two sites selected for the CEC Projects, and the attached file in response to Staff’s Second Set of Interrogatories number 10(b), bearing Bates Label 20FL-CEC-002048 - 20FL-CEC-002049, contains confidential proprietary business information relating to unit retirements. This Request is timely. *See* Rule 25-22.006(3)(a)1, F.A.C. In support of this Request, DEF states:

DEF’s response to Staff’s Second Set of Interrogatories (Nos. 4-26) contains “proprietary confidential business information” under § 366.093(3), Florida Statutes.

1. 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 was submitted separately in a sealed envelope labeled “CONFIDENTIAL” on October 29, 2020 (DN 11610-2020). 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 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.

2. As indicated in Exhibit C, the information for which DEF requests confidential classification is “proprietary confidential business information” within the meaning of § 366.093(3), F.S. The information at issue is in DEF’s response to Staff’s Second Set of Interrogatories number 8(a), which contains confidential proprietary business information relating to two sites selected for the CEC Projects, and the attached file in response to Staff’s Second Set of Interrogatories number 10(b), bearing Bates Label 20FL-CEC-002048 - 20FL-CEC-002049, which contains confidential proprietary business information relating to unit retirements, the disclosure of which would harm DEF’s competitive business interests, to the detriment of DEF’s customers, if it were disclosed to the public *See* § 366.093(3)(e), F.S.; Affidavit of Benjamin Borsch at ¶¶ 3 and 4. Accordingly, such information constitutes “proprietary confidential business information” which is exempt from disclosure under the Public Records Act pursuant to § 366.093(1), F.S.

3. The information identified as Exhibit “A” is intended to be and is treated as confidential by the Company. *See* Affidavit of Borsch at ¶¶ 4 and 5. The information has not

been disclosed to the public, and the Company and counterparties have treated and continue to treat this information as confidential. *Id.*

4. DEF requests that the information identified in Exhibit A be classified as “proprietary confidential business information” within the meaning of § 366.093(3), F.S., that the information remains confidential for a period of at least 18 months as provided in § 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 18th day of November 2020.

Respectfully submitted,

/s/ Dianne M. Triplett

DIANNE M. TRIPLETT
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E: Matthew.Bernier@duke-energy.com
FLRegulatoryLegal@duke-energy.com

CERTIFICATE OF SERVICE

Docket No. 20200176-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 18th day of November, 2020.

/s/ Dianne M. Triplett

Attorney

<p>Bianca Lherisson / Shaw Stiller Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 blheriss@psc.state.fl.us sstiller@psc.state.fl.us</p> <p>Bradley Marshall / Jordan Luebke Earthjustice 111 S. Martin Luther King Jr. Blvd. Tallahassee, FL 32301 bmarshall@earthjustice.org jluebke@earthjustice.org</p> <p>Dominique Burkhardt Earthjustice 4500 Biscayne Blvd., Ste. 201 Miami, FL 33137 dburkhardt@earthjustice.org flcaseupdates@earthjustice.org</p> <p>Katie C. Ottenweller 838 Barton Woods Rd., NE Atlanta, GA 30307 katie@votesolar.org</p> <p>George Cavros 120 E. Oakland Park Blvd., Ste. 105 Ft. Lauderdale, FL 33334 george@cavros-law.com</p>	<p>J.R. Kelly / Charles Rehwinkel Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us rehwinkel.charles@leg.state.fl.us</p> <p>Jon C. Moyle, Jr. / Karen A. Putnal 118 N. Gadsden St. Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com mqualls@moylelaw.com</p> <p>Stephanie U. Eaton 110 Oakwood Dr., Ste. 500 Winston-Salem, NC 27103 seaton@spilmanlaw.com</p> <p>Derrick P. Williamson / Barry A. Naum 1100 Bent Creek Blvd., Ste. 101 Mechanicsburg, PA 17050 dwilliamson@spilmanlaw.com bnaum@spilmanlaw.com</p>
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Exhibit A

CONFIDENTIAL
FILED on October 29, 2020
under separate cover

Exhibit B
(Two Copies)

REDACTED

REDACTED

8. Please refer to DEF witness Stout’s direct testimony, Page 12, Line 17 through Page 14, Line 15.
- a. Provide an update to whether DEF has selected any site(s) for the CEC projects. If so, please identify the site(s).
 - b. Please explain what opportunity, if any, there is for true-up of actual project costs compared to the estimates presented within the petition.
 - c. If actual costs exceed those included in its petition, explain how DEF would seek recovery of those costs and what effects it would have on participants and non-participants. As part of your explanation, discuss whether program changes would occur to participants, such as changes in bill credits or charges. If there would be no changes to participant credits or charges, explain why not.
 - d. If actual costs are below those included in its petition, explain what actions DEF would take and what effects it would have on participants and non-participants. As part of your explanation, discuss whether program changes would occur to participants, such as changes in bill credits or charges. If there would be no changes to participant credits or charges, explain why not.

Response:

a. [REDACTED]

[REDACTED]

[REDACTED]

- b. Approval of DEF’s Program includes approval of the design of the Program as well as construction of the 10 units at the estimated cost. As described in DEF’s petition and testimony, these units will be included in rate base and so will be subject to prudence review if actual costs come in higher than projected and DEF seeks to include this difference in rate base in a future rate case. To the extent the units come on-line at or below the estimated cost, no additional prudence review will be necessary. DEF has exercised, and will continue to exercise, cost-control measures to ensure that its CEC Program solar facilities are constructed at or below the projected costs.
- c. Please see response to 8b above. Absent the CEC program, any cost changes for the construction of the units, including the benefits of completing the project above or below budget, as well as other changes in the assumed costs, would flow to the general body of customers. The existence of the CEC program does not change this basic concept; any cost changes (both under and over runs) would flow to the general body

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- 10 Please refer to DEF witness Borsch's direct testimony, Exhibit BMHB-4
- b Provide the annual change in each season's total capacity available caused by unit additions, retirements, and uprates/derates. Identify both the unit(s) and megawatts associated with each, for each year of the proposed project life, for each resource plan, with and without the CEC projects. As part of your response, complete the table below and provide in electronic (Excel) format

[Winter]					[Summer]				
Season	Without CEC Units				Scenario	Without CEC Units			
Year	Unit Additions	Retirements	Uprates / Downrates	Annual Change in Capacity Available	Year	Unit Additions	Retirements	Uprates / Downrates	Annual Change in Capacity Available
2020	Columbia Solar			75	2020	Columbia Solar			75
2020	DeBary Solar			75	2020	DeBary Solar			75
2020		Avon Park 1-2		-50	2020		Avon Park 1-2		-48
2021	Santa Fe Solar			75	2021	Santa Fe Solar			75
2021	Twin Rivers Solar			75	2021	Twin Rivers Solar			75
2021	Duette Solar			75	2021	Duette Solar			75
2021	Charlie Creek Solar			75	2021	Charlie Creek Solar			75
2021	Archer Solar			56	2021	Archer Solar			56
2021		Southern Contract Expires		-424	2021		Southern Contract Expires		-424
2022					2022				
2023					2023				
2023		Orlando Contract Expires		-115	2023		Orlando Contract Expires		-115
2024					2024				
2024		Shady Hills Contract Expires		-522	2024		Shady Hills Contract Expires		-480
2024			Osprey Transmission Upgrade	355	2024			Osprey Transmission Upgrade	337
2024		Mulberry Contract Expires		-115	2024		Mulberry Contract Expires		-115
2025		Bayboro 1-4		-238	2025		Bayboro 1-4		-171
2025		Orange Contract Expires		-104	2025		Orange Contract Expires		-104
2027		DeBary 2-6		-324	2027		DeBary 2-6		-249
2027		Bartow 1 and 3		-105	2027		Bartow 1 and 3		-82
2027		Vandolah Contract Expires		-681	2027		Vandolah Contract Expires		-640
2027		UF		-46	2027		UF		-44
2027	New CT			479	2027	New CT			452
2028	New CT			240	2028	New CT			226
2029					2029				
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2030	New CT			240	2030	New CT			226
2031					2031				
2032	New CT			240	2032	New CT			226
2033					2033				
2034					2034				
2034					2034				
2034					2034				
2034					2034				
2034	New CTs			958	2034	New CTs			903
2034	New CC			1,377	2034	New CC			1,277
2036					2036				
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2038					2038				
2038	New CTs			719	2038	New CTs			677
2040	New CT			240	2040	New CT			226
2042					2042				
2042	New CC			1,377	2042	New CC			1,277
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2044	New CTs			479	2044	New CTs			452
2045	New CT			240	2045	New CT			226
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New CTs and New CCs are in service in June
 All Solar Generation is reported as nameplate value.
 Solar Capacity Degradation not included.

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2021		Southern Contract Expires		-424	2021		Southern Contract Expires		-424
2022	Clean Energy Connection			150	2022	Clean Energy Connection			150
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**DUKE ENERGY FLORIDA
Confidentiality Justification Matrix**

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
<p>DEF's Response to Staff's Second Set of Interrogatories (Nos. 4-26).</p>	<p><u>Response to Question 8(a):</u> The information in DEF's Response to question number 8(a) is confidential in its entirety.</p> <p><u>Response to Question 10(b)</u> The information in DEF's responsive document to question number 10(b), bearing Bates Label 20FL-CEC-002048, located under the first column titled, "[Winter], Without CEC Units," under subcolumn titled "Retirements" in row "2030" to row "2046" is confidential in its entirety.</p> <p>The information in DEF's responsive document to question number 10(b), bearing Bates Label 20FL-CEC-002048, located under the first column titled, "[Winter], Without CEC Units," under subcolumn titled "Annual Change in Capacity Available" in row "2030," the four rows titled, "2034," above number "958," rows "2036" and "2038," above number "719," and rows "2042, 2044" and "2045" is confidential in its entirety.</p> <p>The information in DEF's responsive document to question number 10(b), bearing Bates Label 20FL-CEC-002048, located under the second column titled, "[Summer], Without CEC</p>	<p>§366.093(3)(e), F.S. The document in question proprietary business information, the disclosure of which would harm its competitive business interests</p>

Units,” under subcolumn titled “Retirements,” in row “2030” to row “2046,” is confidential in its entirety

The information in DEF’s responsive document to question number 10(b), bearing Bates Label 20FL-CEC-002048, located under the second column titled, “[Summer], Without CEC Units,” under subcolumn titled “Annual Change in Capacity Available,” in row “2030,” the four rows titled, “2034,” above number “903,” rows “2036” and “2038,” above number “677,” and rows “2042, 2044” and “2045” is confidential in its entirety.

The information in DEF’s responsive document to question number 10(b), bearing Bates Label 20FL-CEC-002049, located under the first column titled, “[Winter], With CEC Units,” under subcolumn titled “Retirements,” in row “2030” to row “2046,” is confidential in its entirety.

The information in DEF’s responsive document to question number 10(b), bearing Bates Label 20FL-CEC-002049, located under the first column titled, “[Winter], With CEC Units,” under subcolumn titled “Annual Change in Firm Capacity Available” in row “2030,” the four rows titled, “2034,” above number “719,” rows “2036” and “2038,” above number “479,” and rows “2042, 2044” and “2045” is

	<p>confidential in its entirety.</p> <p>The information in DEF's responsive document to question number 10(b), bearing Bates Label 20FL-CEC-002049, located under the second column titled, "[Summer], With CEC Units," under subcolumn titled "Retirements," in row "2030" to row "2046," is confidential in its entirety.</p> <p>The information in DEF's responsive document to question number 10(b), bearing Bates Label 20FL-CEC-002049, located under the second column titled, "[Summer], With CEC Units," under subcolumn titled "Annual Change in Firm Capacity Available" in row "2030," the four rows titled, "2034," above number "677," rows "2036" and "2038," above number "452," and rows "2042, 2044" and "2045" is confidential in its entirety.</p>	
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Exhibit D

AFFIDAVIT OF BENJAMIN BORSCH

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for a limited proceeding to approve
Clean Energy Connection Program and Tariff and
Stipulation by Duke Energy Florida, LLC

Docket No. 20200176-EI

Filed: November 18, 2020

**AFFIDAVIT OF BENJAMIN BORSCH IN SUPPORT OF
DUKE ENERGY FLORIDA, LLC'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Benjamin Borsch. 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 IRP & Analytics in DEF's Florida Customer Delivery organization and direct the resource planning process in an integrated approach in order to find the most cost-effective alternatives to meet the Company's obligation to serve its customers in Florida. I also oversee the completion of the Company's Ten-Year Site Plan ("TYSP") filed each April.

3. DEF is seeking confidential classification for certain information contained in DEF's response to Staff's Second Interrogatories number 8(a), which contains confidential proprietary business information relating to two sites selected for the CEC Projects, and the attached file in response to Staff's Second Interrogatories number 10(b) bearing Bates Label 20FL-CEC-002048 - 20FL-CEC-002049, which contains confidential proprietary business information relating to unit retirements, the disclosure of which would harm DEF's competitive business interests, to the detriment of DEF's customers, if it were disclosed to the public.

4. The confidential information at issue is contained in confidential Exhibit A attached to this Request and is outlined in DEF's Justification Matrix that is attached as Exhibit C. DEF is requesting confidential classification of this information because the disclosure of that information to the public would adversely impact DEF's competitive business interests.

5. Strict procedures are established and followed to maintain the confidentiality of the Company's confidential business information relating to DEF's proprietary business information relating to two sites selected for the CEC Projects and proprietary business information relating to unit retirements, which includes restricting access to those persons who need the information to assist the Company, and restricting the number of, and access to the information. At no time since receiving the information in question has the Company publicly disclosed that information. The Company and counterparties have treated and continues to treat the information at issue as confidential.

6. This concludes my affidavit.

Further affiant sayeth not.

[Signature page to follow.]

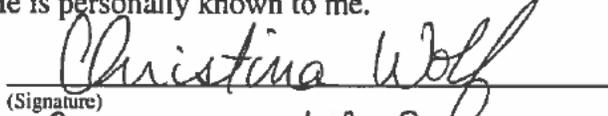
Dated this 13th day of November, 2020.



(Signature)

Benjamin Borsch
Director of IRP & Analytics
Florida Customer Delivery Organization
Duke Energy
299 1st Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 13th day of November, 2020, by Benjamin Borsch. He is personally known to me.



(Signature)

Christina Wolf

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF FLORIDA

9/27/21

(Commission Expiration Date)



(Serial Number, If Any)