



Matthew R. Bernier
ASSOCIATE GENERAL COUNSEL
Duke Energy Florida, LLC

April 30, 2021

VIA ELECTRONIC DELIVERY

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. 20210001-EI*

Dear Mr. Teitzman:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF"), DEF's Request for Confidential Classification concerning certain information contained in DEF's Response to OPC's First Request to Produce (Nos. 1-4) on April 9, 2021 with DEF's Notice of Intent to Request Confidential Classification, in the above referenced docket.

Portions of the documents submitted on April 9, 2021, with DEF's Notice of Intent to Request Confidential Classification no longer require confidential classification. Therefore, Exhibit A has been revised.

This filing includes:

- Revised Exhibit A (confidential slip sheet only)
- Exhibit B (two copies of redacted information)
- Exhibit C (justification matrix)
- Exhibit D (Affidavit of Jeff Swartz)

DEF's confidential Revised Exhibit A that accompanies the above-referenced filing, has been submitted separately.

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/mw
Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20210001-EI

Dated: April 30, 2021

**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 (the “Request”) for certain information provided in response to Office of the Public Counsel’s (“OPC”) First Request to Produce Documents (Nos. 1-4) filed concurrently with DEF’s Notice of Intent to Request Confidential Classification on April 9, 2021. The Request is timely. *See* Rule 25-22.006(3)(a)1., F.A.C. In support of this Request, DEF states:

1. DEF’s responses to OPC’s First Request to Produce Documents, specifically question 2, 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 all the documents for which DEF seeks confidential treatment. Composite Exhibit A was submitted separately in a sealed envelope labeled “CONFIDENTIAL” on April 7, 2021. In the unredacted versions, the information asserted to be confidential is highlighted 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 proprietary third-party drawings, evaluations and information. Pursuant to contracts, DEF is obligated to maintain the confidentiality of this information, and therefore it qualifies for confidential classification. The disclosure of this information could adversely affect the Company’s ability to contract on favorable terms. *See* § 366.093(3)(d), F.S.; Affidavit of Jeffrey Swartz at ¶ 5. Furthermore, disclosure of the information could detrimentally impact DEF’s ability to negotiate favorable contracts, thereby harming its competitive interests, ultimately to its customers’ detriment. *See* § 366.093(3)(e), F.S.; Affidavit of Jeffrey Swartz 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 Jeffrey Swartz 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 Jeffrey Swartz 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 30th day of April, 2021.

s/Matthew R. Bernier

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Duke Energy Florida, Inc.
Docket No.: 20210001
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 30th day of April, 2021 to all parties of record as indicated below.

s/Matthew R. Bernier
Attorney

<p>Suzanne Brownless Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 sbrownle@psc.state.fl.us</p> <p>J. Beasley / J. Wahlen / M. Means Ausley McMullen P.O. Box 391 Tallahassee, FL 32302 jbeasley@ausley.com jwahlen@ausley.com mmeans@ausley.com</p> <p>Russell A. Badders Gulf Power Company One Energy Place, Bin 100 Pensacola, FL 32520-0100 russell.badders@nexteraenergy.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>Anastacia Pirrello / Richard Gentry Office of Public Counsel 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 pirrello.anastacia@leg.state.fl.us gentry_richard@leg.state.fl.us</p> <p>Paula K. Brown Regulatory Affairs Tampa Electric Company P.O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com</p> <p>Maria Moncada Florida Power & Light Company 700 Universe Blvd. (LAW/JB) Juno Beach, FL 33408-0420 maria.moncada@fpl.com</p> <p>James Brew / Laura W. Baker Stone Law Firm 1025 Thomas Jefferson St., N.W. Suite 800 West Washington, DC 20007 jbrew@smxblaw.com lwb@smxblaw.com</p> <p>Mike Cassel Florida Public Utilities Company 208 Wildlight Avenue Yulee, FL 32097 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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Revised Exhibit A

“CONFIDENTIAL”

(submitted under separate cover)

Exhibit B

REDACTED

(two copies)

Bartow 4A Generator Major Inspection Sp 19

Library: Component Assessment

As of Tuesday, Mar 09, 2021 at 16:55

Report Details

Summary As part of a planned outage, a major inspection has been scheduled to be performed based on low ELCID trend data from a 2015 robotic inspection and based on Bartow 4C stator bar failure that occurred in 2018.

Assessment Overall, unit was acceptable to be returned to service. However, PD/Corona has been discovered on the stator slots. While repair has been made to the PD/Corona, it will need to be monitored in upcoming inspections to assess if it is deteriorating further. Update 3/10/2020-



Recommendation It is recommended to perform generator inspections on Bartow 4A per OPTIM. A borescope inspection shall be performed on this unit to look for any buckling on stator bars as they exit the slots. It is also recommended to schedule a stator rewind in the next possible opportunity. In the next scheduled inspection, PD/Corona that was identified during this inspection should be assessed for any further deterioration. Based on bearing damage on the EE, Station shall perform megger testing on the bearings periodically.

Evaluated Condition Unacceptable

Report by Roger Kondos

Date of Report Wednesday, April 10, 2019

Last Edit Date Thursday, Aug 13, 2020 at 15:30

Maintenance Management

Equipment Code BRR-04A-GEN-ELE-GEN-2822310

Date of Next Report

Library Specification

Library Component Assessment

Type of Detail Unit

Detail Selection Bartow 4A

Report Organization

Report Type Individual Assessment of an Equipment Type

Component Configuration

Library Component Assessment

Category Turbine Generator

Equipment Type Generator/Exciter

Utility Standard System Generator

Report Standard Procedure

Reference Library

Reference Report

Report Classification

Topic Group

Topic

Sub-Topic

REDACTED

Library: Component Assessment
As of : Tuesday, Mar 09, 2021 at 16:55

Stator Winding Report (#112726)

Detail Information

Summary As part of this generator major inspection, a thorough visual inspection has been performed along with a battery of electrical testing on the stator. A bump test has been performed on the endwindings and blocking repairs were required following that.

Assessment Overall, condition of the stator was in satisfactory condition to be returned to service. The bump test identified the endwinding to be loose which required tangential blocking installations and repair to be performed on both ends of the generator. Several areas were shown to contain PD/Corona that also needed to be repaired. Update 3/10/2020- [REDACTED]

Recommendation It is recommended to continue to perform visual inspections and electrical testing on the stator in the next generator inspections. Recommend to perform a borescope on the all the stator coils to look for any buckling on the stator bars as they exit the slots. A full stator rewind shall be scheduled based on Bartow 4B RCA.

Evaluated Condition Unacceptable

Report by Roger Kondos

Date of Evaluation Wednesday, April 10, 2019

Last Updated on Thursday, Aug 13, 2020 at 15:20

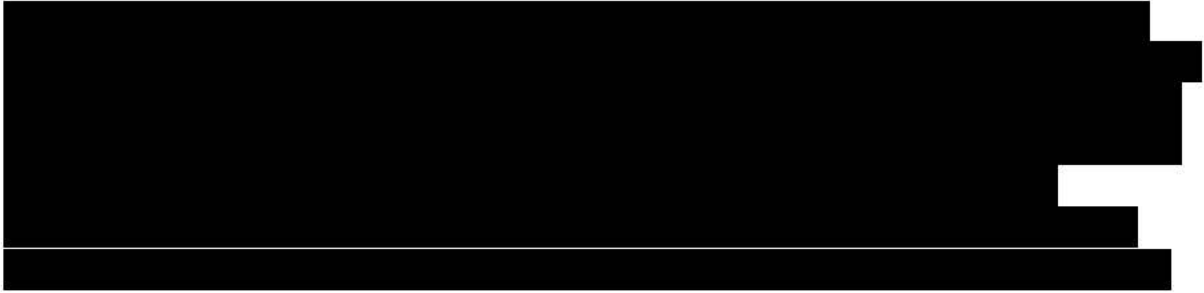
Component Configuration

(Sub) Component Stator Winding

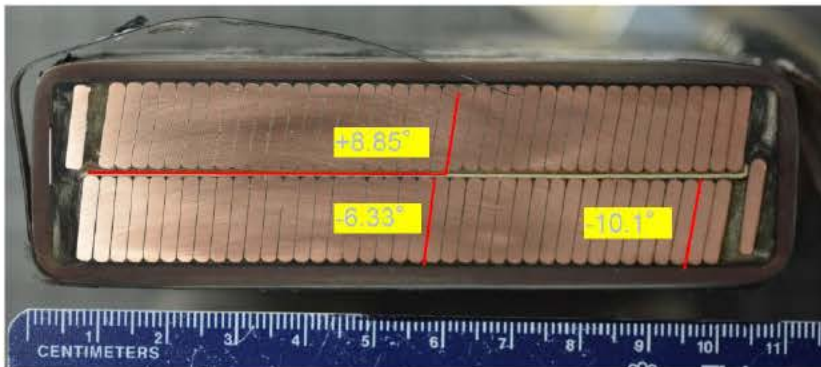
Standard of Assessment

Condition Evaluation CheckList

Item/Criteria	Condition		Comments
Item:Direct-cooled Winding Cooling Flow Criteria:Green – All readings within 10% of the average Red – Any tubes >10% of the average	Not Applicable		
Item:Slot RTD/TC Functional Criteria: Green – All RTDs functional Yellow - >10% RTDs out of service Red – >25% RTDs out of service	Acceptable	G	
Item:End Winding Visual Criteria:Engineering Judgment	Watch List	C	
Item:Partial Discharge Criteria:Green – No increase in PD from last test Yellow - 25% increase in PD from last test Red – >25% increase in PD since last test	Marginal	Y	There was considerable evidence of corona attack or partial discharge on the end portions of the winding. On the exciter end, 16 top coils and 3 bottom coils had signs of partial discharge, and on the turbine end 23 top coils and 1 bottom coil had signs of partial discharge.
Item:Wedge Tightness Criteria:Green – No dusting, greasing and <25% loose Yellow - Slight dusting, greasing and 25-40% loose Red – Excessive dusting, greasing and >40% loose or greater than 5 consecutive wedges loose in one slot	Not Applicable		



Cross Section Measurements Top Coil # 2



Top Coil 2
Top/Left stack – 8.85°
Bottom/right stack – 6.33
& 10.1°

Note this location is further in the core than CT scan. ~ 265 mm

Further investigation by Siemens into the operational history of the 4B generator identified that early in life the average winding temperatures had run hotter than typical for the fleet. Historically the fleet has operated in the range of 160 - 200F winding temperature (as measured by embedded RTDs), but from June 2009 until 2012/2013 the 4B generator ran with temperatures in the 200 - 240F range. These temperatures were still below the OEM recommended alarm. (OEM alarm is based on temperature rise across the stator winding when compared to cold gas, giving an alarm around 270F and unload of 279F for typical generator cold gas temperatures during this period). Expanding this investigation, it was found that all four CTG at Bartow had experienced these hotter temperatures. Review of the 2012/2013 outage reports showed that degraded core seals were found and replaced during those outages, and upon startup following the outage the winding temperatures took a step change decrease of ~30F back to the normal fleet operating temperature.



A review of documentation showed that Siemens identified a risk with core seal degradation in 2008, and issued OEM Technical Advisory PB2-08-5038 (*Inspection of Core Seals on SGEN5-1000A*). In 2013, new advisory PB3-13-0008 (*Generator, Stator Core Seals, Inspection and Replacement*) was issued superseding the 2008 bulletin. Siemens identified this risk as low, but recommended that a new upgraded core seal design be implemented if degraded seals were found. These new seals were installed during the 2012 and 2013 outages for all four Bartow units.

BACKGROUND

The function of the core seals is to act as barriers that separate the generator into nine separate cooling zones.

Figures 1 and 2 show the locations of the core seals in relation to the overall generator. The seals are located in 10 places; each seal is 360 degrees around the stator core.



Figure 2: Photo of Generator with Upper Frame Removed.





3 Extent of Condition

TGS performed a review of operating temperatures on all Siemens SGEN6-1000A generators in the Duke fleet back to the commissioning date of each unit. All four Bartow generators experienced similar winding temperatures for the same period of approximately four years. Therefore, there is a high likelihood that a sub-surface insulation crack has been initiated on the other three CTG that have not yet been rewound, but this crack has not yet propagated to the point of breaching the insulation integrity. This is also supported by the 4C in-service failure in 2018 in a very similar failure location.

The fleet review did not identify any other 1000A generators that exceeded the typical 200F winding temperature, and the risk is deemed to be low on these other generators.

4 TGS Generator Engineering Recommendation

Based on the Siemens RCA conclusion, TGS has assessed the risk on the other three CTG as very high for the following reasons:

- There have been three failed stator coils (4C, 4B) in the last 18 months in a very similar location on the bar.
- All four CTG experienced the same temperature excursions early in life.
- Despite having recent inspections on all 4 CTG, the suspect condition (buckled insulation) was not known or inspected for at the time of 4A & 4C outages, so current condition is unknown on these two generators.
- 4D was inspected in Fall 2019, and no buckled insulation was identified. However, there is likely sub-surface insulation cracks that have been initiated, and there is no known method to detect crack depth or length in the industry
- There is no other known data in industry to formulate a trend or projection to failure

[Redacted]

Based on close proximity of the insulation crack to the stator core, a direct strike to the core is most probable, with core damage at



some level expected. Since these units are GVPI design, core iron replacement is not easy and would likely require complete generator replacement. There is currently no known method to inspect for sub-surface insulation cracks in the industry, based on the type of insulation and suspected location area.

TGS recommends purchasing a spare set of stator bars immediately as a schedule insurance against an in-service failure, and planning pro-active rewinds within the next 3 years. A spare set of bars would provide schedule insurance for a potential emergent failure to try to run these units to the planned CT Majors in 2023/24.

[REDACTED]

[REDACTED]

Documents bearing bates numbers
20210001-DEF-000021
through
20210001-DEF-000046
are confidential in their entirety.

Bartow 4A Generator Major Inspection Sp 19

Library: Component Assessment

As of Tuesday, Mar 09, 2021 at 16:55

Report Details

Summary As part of a planned outage, a major inspection has been scheduled to be performed based on low ELCID trend data from a 2015 robotic inspection and based on Bartow 4C stator bar failure that occurred in 2018.

Assessment Overall, unit was acceptable to be returned to service. However, PD/Corona has been discovered on the stator slots. While repair has been made to the PD/Corona, it will need to be monitored in upcoming inspections to assess if it is deteriorating further. Update 3/10/2020-



Recommendation It is recommended to perform generator inspections on Bartow 4A per OPTIM. A borescope inspection shall be performed on this unit to look for any buckling on stator bars as they exit the slots. It is also recommended to schedule a stator rewind in the next possible opportunity. In the next scheduled inspection, PD/Corona that was identified during this inspection should be assessed for any further deterioration. Based on bearing damage on the EE, Station shall perform megger testing on the bearings periodically.

Evaluated Condition Unacceptable

Report by Roger Kondos

Date of Report Wednesday, April 10, 2019

Last Edit Date Thursday, Aug 13, 2020 at 15:30

Maintenance Management

Equipment Code BRR-04A-GEN-ELE-GEN-2822310

Date of Next Report

Library Specification

Library Component Assessment

Type of Detail Unit

Detail Selection Bartow 4A

Report Organization

Report Type Individual Assessment of an Equipment Type

Component Configuration

Library Component Assessment

Category Turbine Generator

Equipment Type Generator/Exciter

Utility Standard System Generator

Report Standard Procedure

Reference Library

Reference Report

Report Classification

Topic Group

Topic

Sub-Topic

REDACTED

Library: Component Assessment
As of : Tuesday, Mar 09, 2021 at 16:55

Stator Winding Report (#112726)

Detail Information

Summary	As part of this generator major inspection, a thorough visual inspection has been performed along with a battery of electrical testing on the stator. A bump test has been performed on the endwindings and blocking repairs were required following that.
Assessment	Overall, condition of the stator was in satisfactory condition to be returned to service. The bump test identified the endwinding to be loose which required tangential blocking installations and repair to be performed on both ends of the generator. Several areas were shown to contain PD/Corona that also needed to be repaired. Update 3/10/2020- [REDACTED]
Recommendation	It is recommended to continue to perform visual inspections and electrical testing on the stator in the next generator inspections. Recommend to perform a borescope on the all the stator coils to look for any buckling on the stator bars as they exit the slots. A full stator rewind shall be scheduled based on Bartow 4B RCA.
Evaluated Condition	Unacceptable
Report by	Roger Kondos
Date of Evaluation	Wednesday, April 10, 2019
Last Updated on	Thursday, Aug 13, 2020 at 15:20

Component Configuration

(Sub) Component Stator Winding

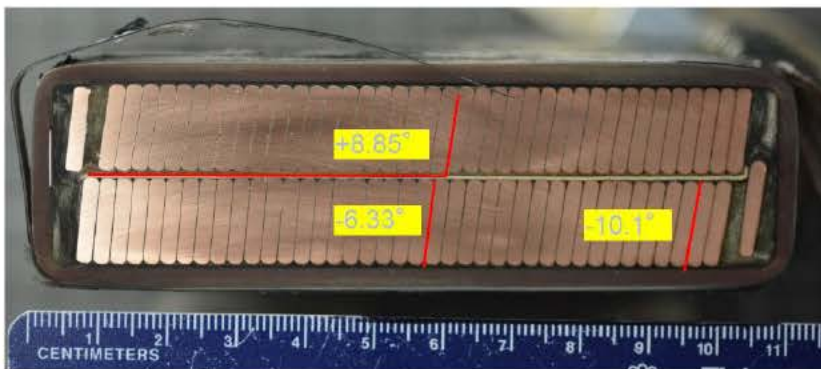
Standard of Assessment

Condition Evaluation CheckList

Item/Criteria	Condition		Comments
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Item: Wedge Tightness Criteria: Green – No dusting, greasing and <25% loose Yellow - Slight dusting, greasing and 25-40% loose Red – Excessive dusting, greasing and >40% loose or greater than 5 consecutive wedges loose in one slot	Not Applicable		



Cross Section Measurements Top Coil # 2



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A review of documentation showed that Siemens identified a risk with core seal degradation in 2008, and issued OEM Technical Advisory PB2-08-5038 (*Inspection of Core Seals on SGEN5-1000A*). In 2013, new advisory PB3-13-0008 (*Generator, Stator Core Seals, Inspection and Replacement*) was issued superseding the 2008 bulletin. Siemens identified this risk as low, but recommended that a new upgraded core seal design be implemented if degraded seals were found. These new seals were installed during the 2012 and 2013 outages for all four Bartow units.

BACKGROUND

The function of the core seals is to act as barriers that separate the generator into nine separate cooling zones.

Figures 1 and 2 show the locations of the core seals in relation to the overall generator. The seals are located in 10 places; each seal is 360 degrees around the stator core.



Figure 2: Photo of Generator with Upper Frame Removed.





3 Extent of Condition

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[REDACTED]

[REDACTED]

Documents bearing bates numbers
20210001-DEF-000021
through
20210001-DEF-000046
are confidential in their entirety.

**DUKE ENERGY FLORIDA
Confidentiality Justification Matrix**

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
<p>DEF's Response to OPC's First Request to Produce Documents (Nos. 1-4)</p>	<p>Question 2: Attachments bearing bates numbers 20210001-DEF--000002 and 20210001-DEF-000004: The remaining information in the section titled "Assessment" after "3/10/20 is confidential.</p> <p>Attachments bearing bates numbers 20210001-DEF-000016: The remaining information after "2018" through "Cross Section Measurements Top Coil #2" on 20210001-DEF-000017 is confidential.</p> <p>Attachments bearing bates numbers 20210001-DEF-000018: The remaining information after "Figure 2" through "Extent Condition on 20210001-DEF-000019 and the information after "projection to failure" and before "Based on" is confidential.</p> <p>Attachment bearing bates number 20210001-DEF-000020: The remaining information after "Majors in 2023/24" is confidential.</p> <p>Attachments bearing bates numbers 20210001-DEF-000021 through 20210001-DEF-000046: The documents are confidential in their entirety.</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>

Exhibit D

AFFIDAVIT OF JEFFREY SWARTZ

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20210001-EI

Dated: April 30, 2021

**AFFIDAVIT OF JEFFREY SWARTZ 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 Jeffrey Swartz, who being first duly sworn, on oath deposes and says that:

1. My name is Jeffrey Swartz. 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 Vice President of Florida Generation in the Regulated and Renewable Energy Department. This section is responsible for overall leadership and strategic direction of DEF's power generation fleet.

3. As the Vice President of Florida Generation, I am responsible, along with the other members of the section, for strategic and tactical planning to operate and maintain DEF's non-nuclear generation fleet, generation fleet project and additions

recommendations, major maintenance programs, outage and project management, and retirement of generation facilities.

4. DEF is seeking confidential classification for information contained in DEF's Response to OPC's First Request to Produce Documents (Nos. 1-4), specifically question 2, filed on April 9, 2021, in this docket. 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 competitive business interests.

5. The confidential information at issue is confidential proprietary information. The information contains drawings, evaluations and information of both DEF and third-party companies, the disclosure of which would impair the Company's competitive business interests and efforts to contract for goods or services on favorable terms. DEF has not publicly disclosed the information. Without DEF's measures to maintain the confidentiality of this sensitive business information, DEF's ability to contract with third-parties could detrimentally impact DEF's ability to negotiate favorable contracts, thereby harming its competitive interests, ultimately to its customers' detriment.

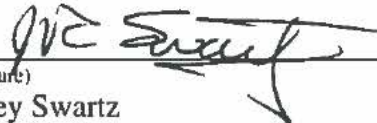
6. Upon receipt of its own confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist the Company, and restricting the 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.

7. This concludes my affidavit.

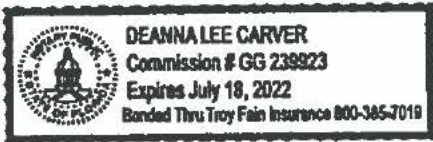
Further affiant sayeth not.

Dated the 28th day of APRIL, 2021.

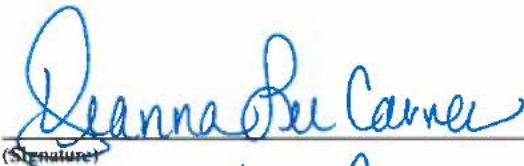


(Signature)
Jeffrey Swartz
Vice President Florida Generation
Duke Energy Florida, LLC
Florida Regional Headquarters
St. Petersburg, FL

28 THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 28 day of April, 2021 by Jeffrey Swartz. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



(AFFIX NOTARIAL SEAL)



(Signature)
Deanna Lee Carver

(Printed Name)
NOTARY PUBLIC, STATE OF FL

July 18, 2022
(Commission Expiration Date)

(Serial Number, If Any)