



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

November 8, 2021

VIA ELECTRONIC FILING

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 Sixth Set of Interrogatories (Nos. 43-51) and OPC's Fifth Request to Produce (Nos. 21-24) submitted on October 21, 2021 with DEF's Notice of Intent to Request Confidential Classification, in the above referenced docket.

This filing includes:

- Exhibit A (confidential slip sheet only)
- Exhibit B (two copies of redacted information)
- Exhibit C (justification matrix)
- Exhibit D (Affidavits of Reginald Anderson and Arnaldo Garcia)

DEF's confidential Exhibit A that accompanies the above-referenced filing, was submitted separately on October 21, 2021 and October 25, 2021, respectively.

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: November 8, 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 for certain information provided in its response to the Office of the Public Counsel’s (“OPC”) Sixth Set of Interrogatories (Nos. 43-51) and OPC’s Fifth Request to Produce (Nos. 21-24), dated October 21, 2021, concurrently with DEF’s Notice of Intent to Request Confidential Classification. This 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 Sixth Set of Interrogatories (Nos. 43-51) , specifically question 46, and OPC’s Fifth Request to Produce (Nos. 21-24), specifically questions 21, 22, and 24, contain information that is “confidential proprietary 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 unredacted copies of all the documents for which DEF seeks confidential treatment. Composite Exhibit A was submitted separately in a sealed envelope labeled “CONFIDENTIAL” on October 21, 2021 and October 25,

2021, respectively. In the unredacted versions, 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 contains affidavits 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, DEF’s response to Interrogatory No. 46 and Request to Produce Nos. 21, 22, and 24, contain confidential proprietary business information, relating to audit processes and procedures, specific contractual terms, third-party information, and insurance policy information. The disclosure of this 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.; Affidavits of Reginald Anderson at ¶ 3 and Arnaldo Garcia at ¶ 4. Moreover, certain information in the Insurance Policy (“the Policy”) is proprietary to a third party and DEF’s disclosure of that information would impact DEF’s ability to contract for goods and services on favorable terms. *See* § 366.093(3)(d), F.S.; Affidavit of Arnaldo Garcia, at ¶ 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* Affidavits of Reginald Anderson at ¶ 6 and Arnaldo Garcia at ¶ 5. The information has not been disclosed to the public, and the Company has treated and continues to treat the information at issue as confidential. *See* Affidavits of Reginald Anderson at ¶ 6 and Arnaldo Garcia at ¶ 5.

6. 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 8th day of November, 2021.

s/Matthew R. Bernier
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Attorneys for Duke Energy Florida, LLC

Duke Energy Florida, LLC
CERTIFICATE OF SERVICE
Docket No. 20210001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email this 8th day of November, 2021, to all parties of record as indicated below.

s/Matthew R. Bernier
Attorney

<p>Suzanne Brownless / Stefanie Jo Osborn Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 sbrownle@psc.state.fl.us sosborn@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. FIPUG 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com mqualls@moylelaw.com</p> <p>Peter J. Mattheis / Michael K. Lavanga</p>	<p>R. Gentry / P. Christensen / A. Pirrello / S. Morse / C. Rehwinkel / M. Wessling Office of Public Counsel 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 christensen.patty@leg.state.fl.us morse.stephanie@leg.state.fl.us rehwinkel.charles@leg.state.fl.us pirrello.anastacia@leg.state.fl.us gentry.richard@leg.state.fl.us wessling.mary@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 Jose Moncada / David M. Lee Florida Power & Light Company 700 Universe Blvd. (LAW/JB) Juno Beach, FL 33408-0420 david.lee@fpl.com maria.moncada@fpl.com</p> <p>James Brew / Laura W. Baker Stone Law Firm White Springs/PCS Phosphate 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</p>
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pjm@smxblaw.com

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FPUC
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Tallahassee, FL 32301
bkeating@gunster.com

Exhibit A

“CONFIDENTIAL”

**(filed under separate cover on October 21,
2021 and October 25, 2021)**

Exhibit B

REDACTED

(two copies)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost
Recovery Clause and Generating
Performance Incentive Factor

Docket No. 20210001-EI
Filed: October 21, 2021

**DUKE ENERGY FLORIDA, LLC'S RESPONSE TO
CITIZENS' SIXTH SET OF INTERROGATORIES (NOS. 43-51)**

Duke Energy Florida, LLC ("DEF") responds to the Citizens of the State of Florida, through the Office of Public Counsel's ("Citizens" or "OPC") Sixth Set of Interrogatories to DEF (Nos. 43-51) as follows:

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For questions 43-51 please refer to your response to Citizens' Third Request to Produce Documents:

46. Is DEF aware of any industry experience (IE) related to the damage, defect or failure identified in Bartow CC Event Report # 1141500.

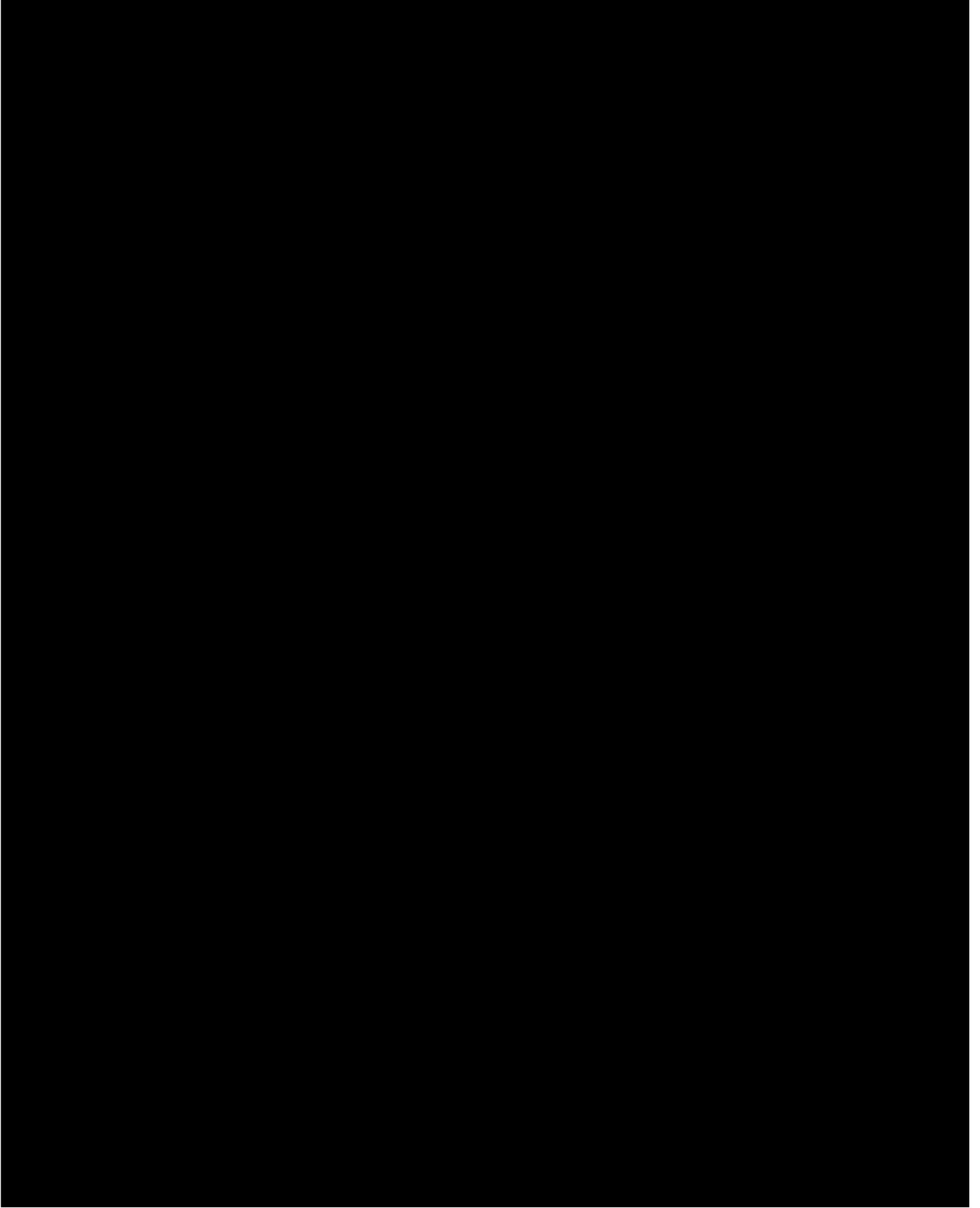
Response

REDACTED

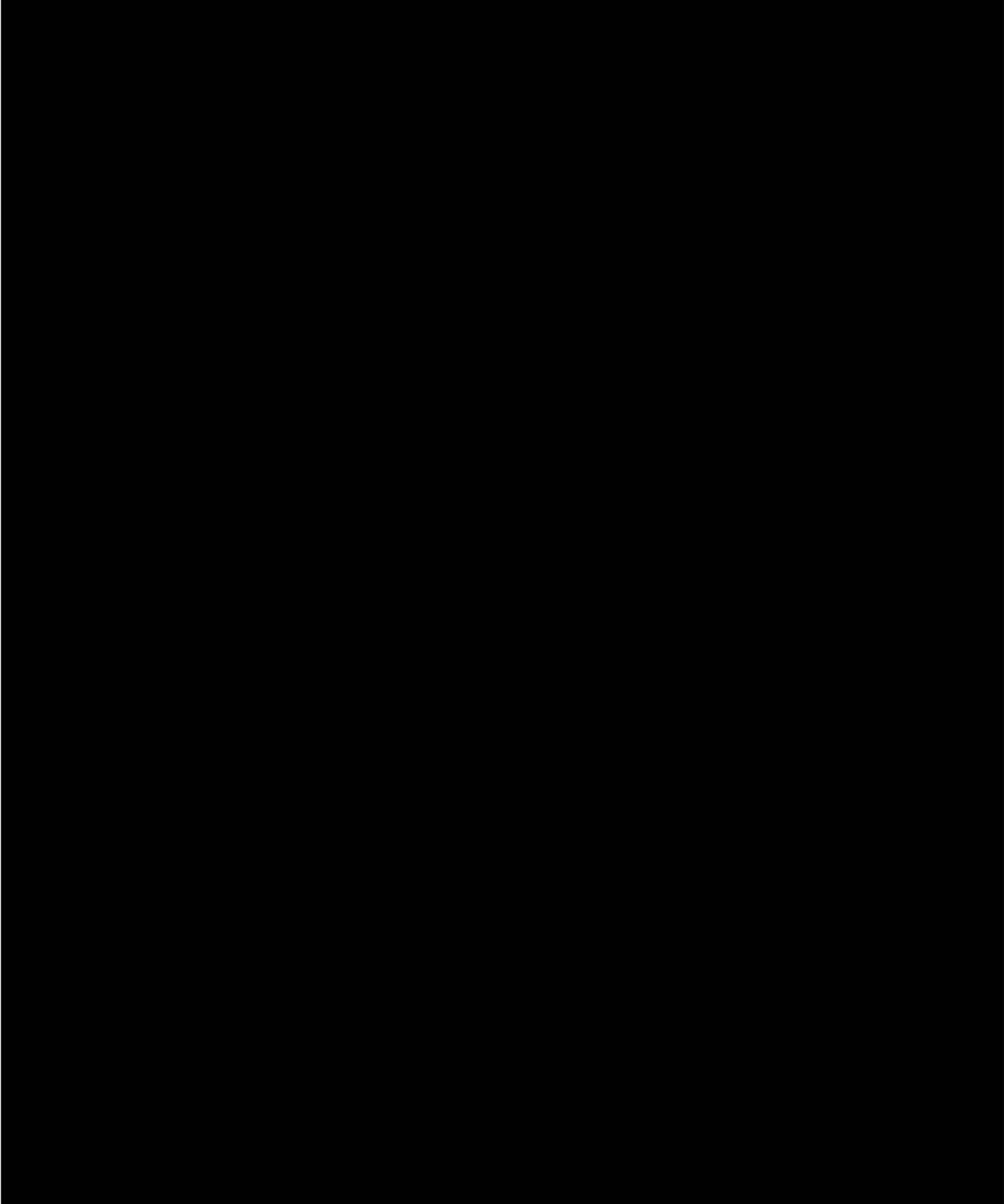
DEF restates and incorporates its objection to this interrogatory submitted on September 28, 2021. Subject to and without waiving its objection to this interrogatory, DEF has encountered similar issues on the Unit 4A, 4B and 4C generator stator bars, and took a planned outage on the 4D generator to correct the issue ahead of an in-service failure. As discussed in the RCAs produced in response to OPC's Request to Produce No. 1 (Nos. 1-4), question 2, bearing bates numbers 20210001-DEF-000021 through 20210001-DEF-000046, the Root Cause of the damage was defective [REDACTED], which was brought to DEF's attention by the OEM.

Please see DEF's response to OPC's Request to Produce, question 22.

REDACTED



REDACTED



20210001-DEF-000308

REDACTED

20210001-DEF-000309

REDACTED

20210001-DEF-000310

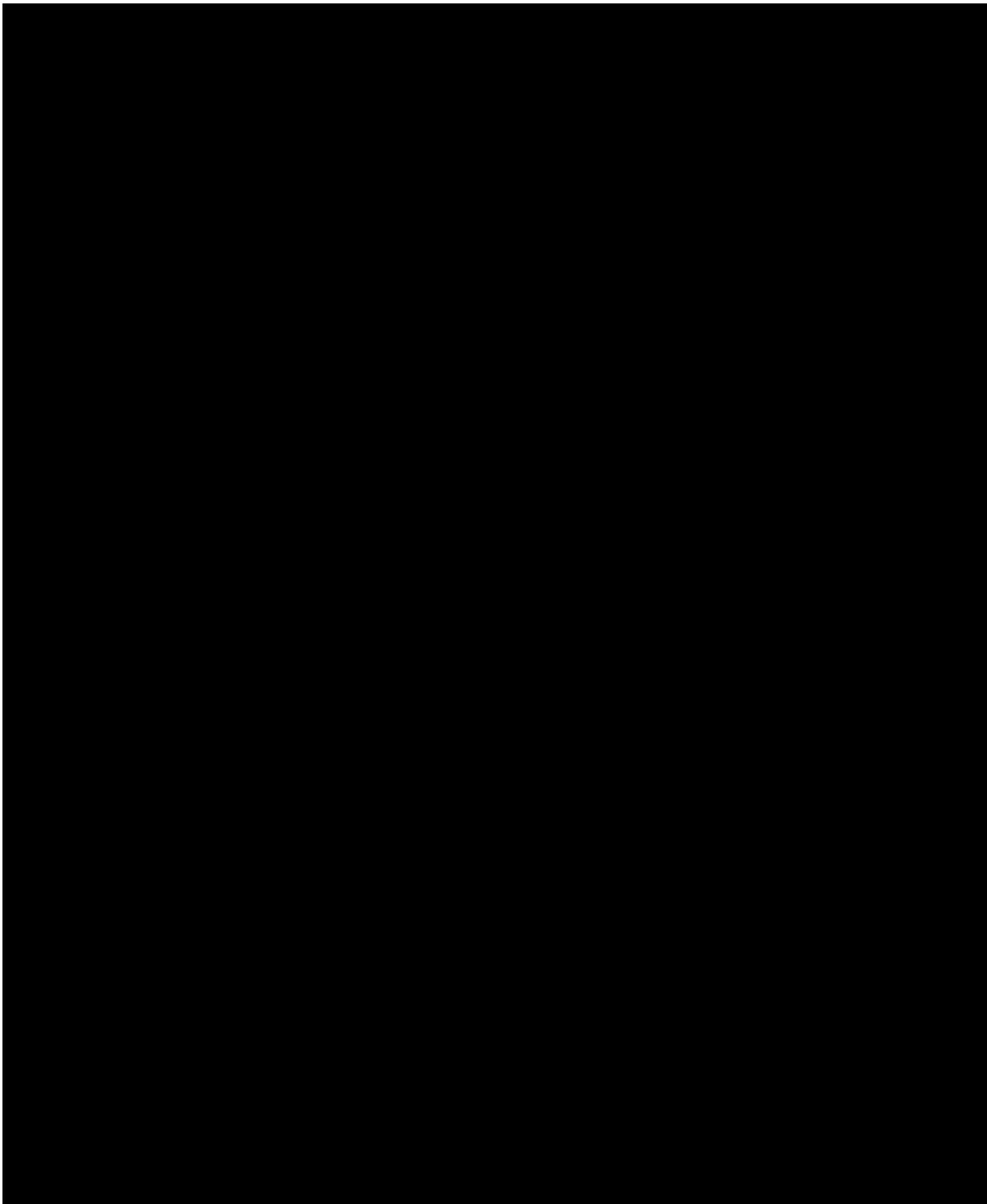
REDACTED

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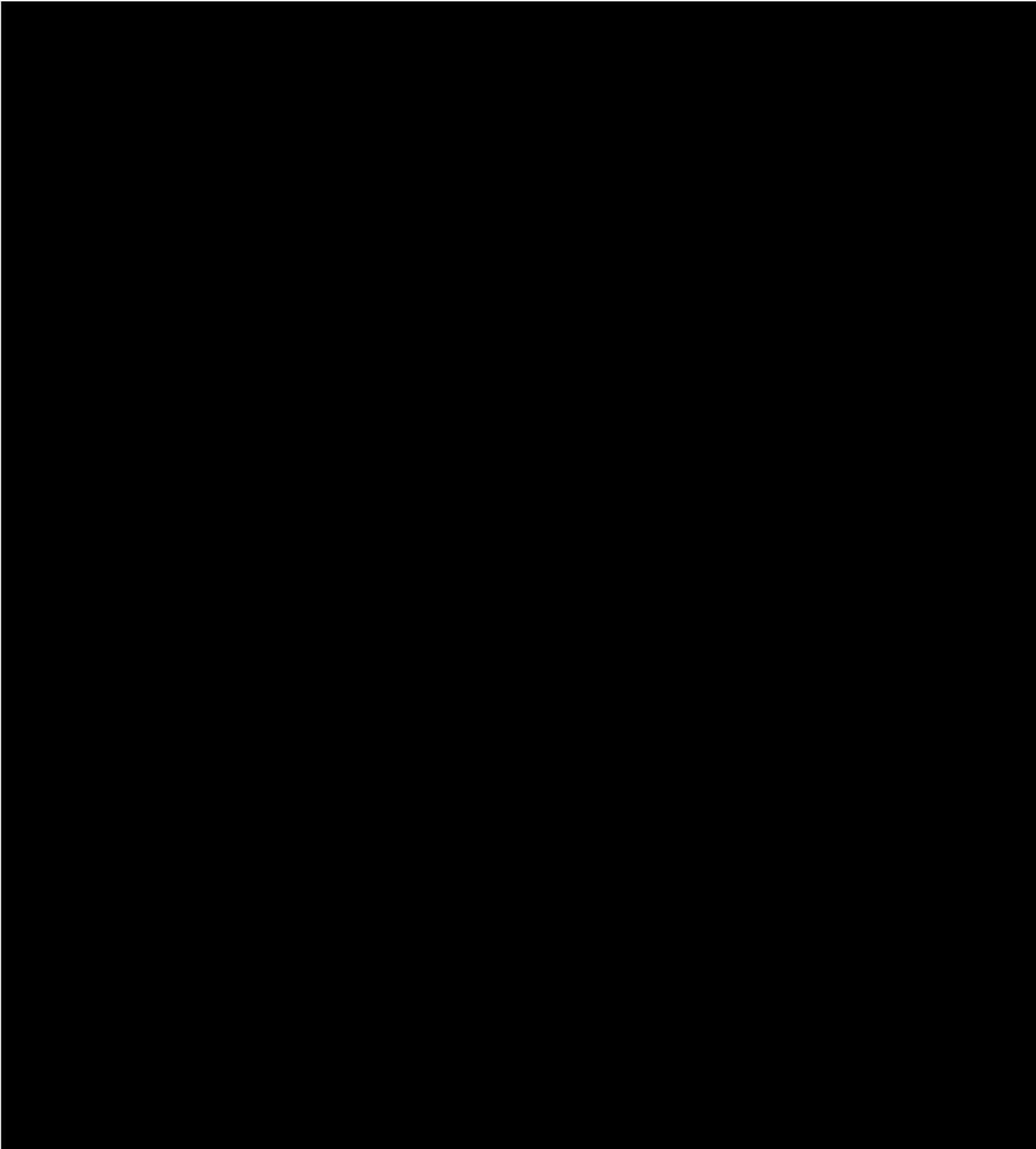
REDACTED

20210001-DEF-000312

REDACTED

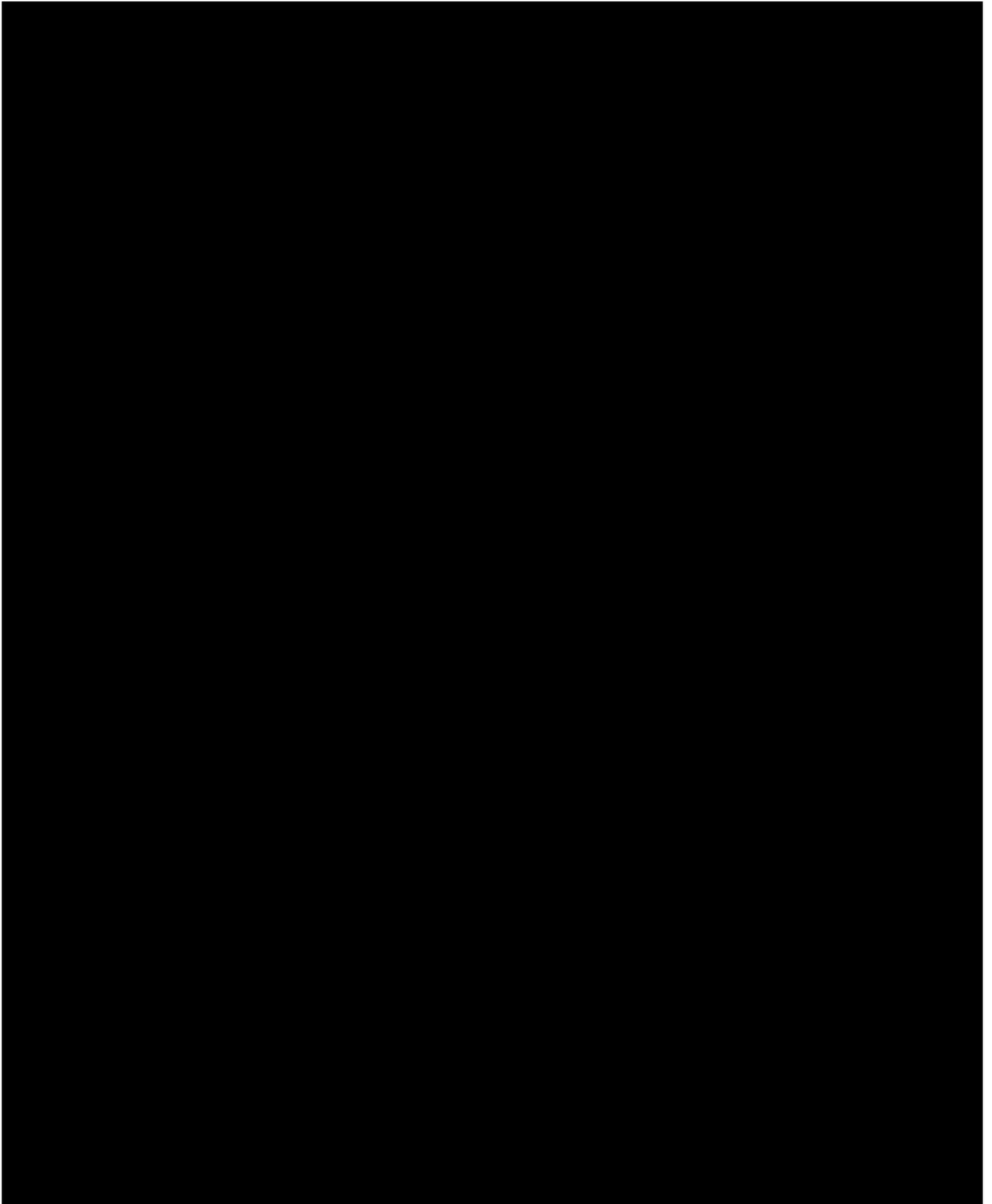


REDACTED



20210001-DEF-000314

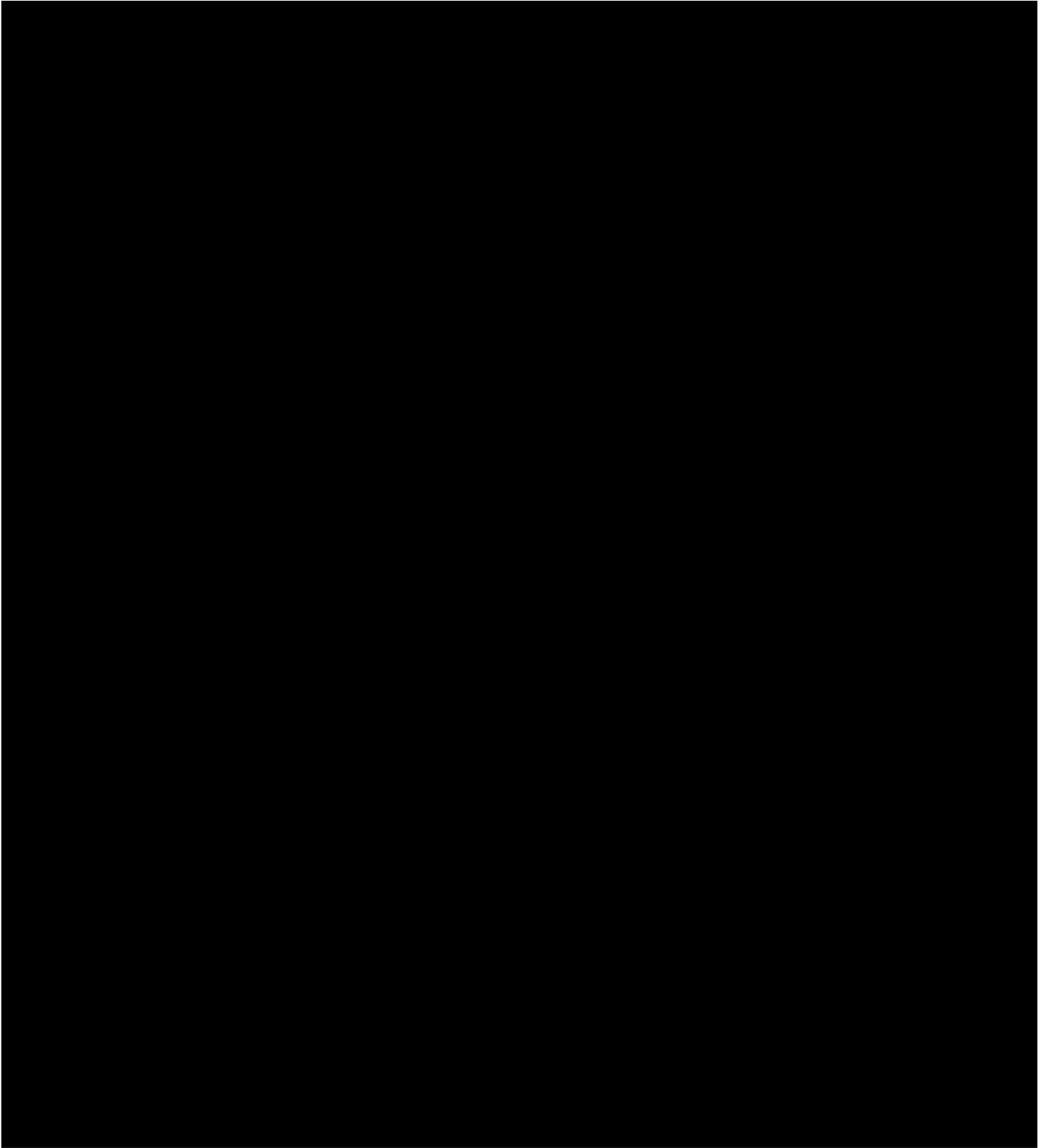
REDACTED



REDACTED

20210001-DEF-000316

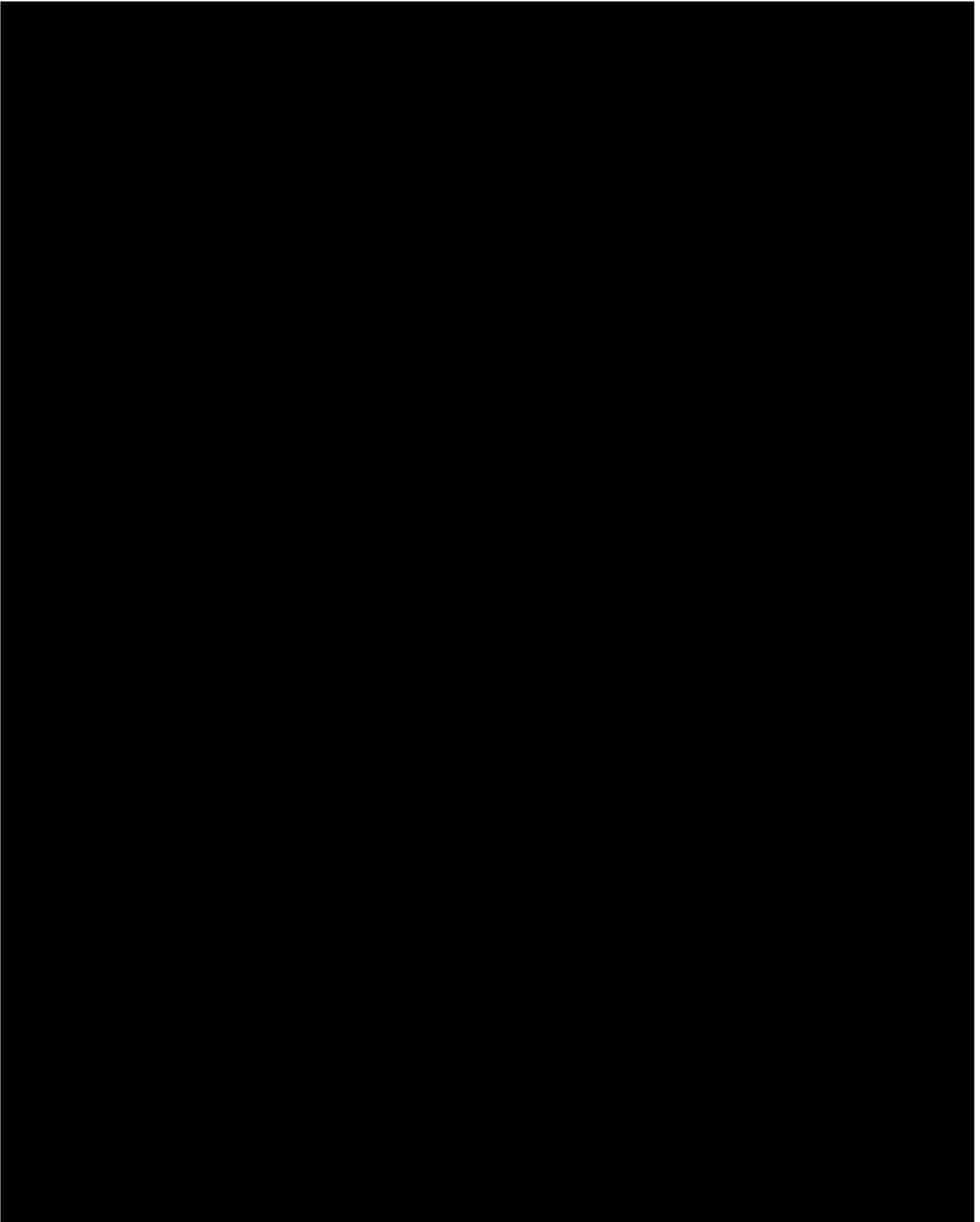
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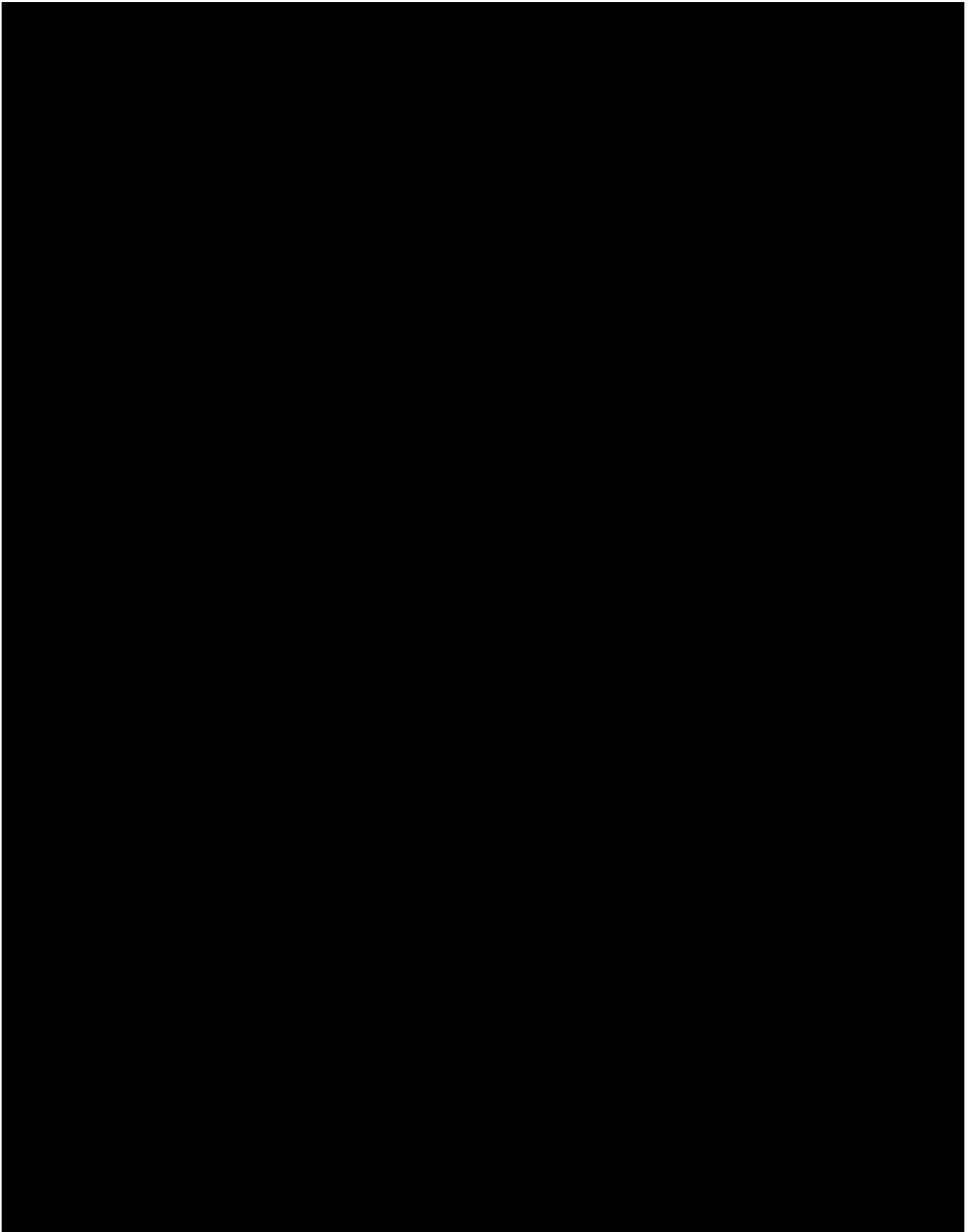
REDACTED

20210001-DEF-000318

REDACTED

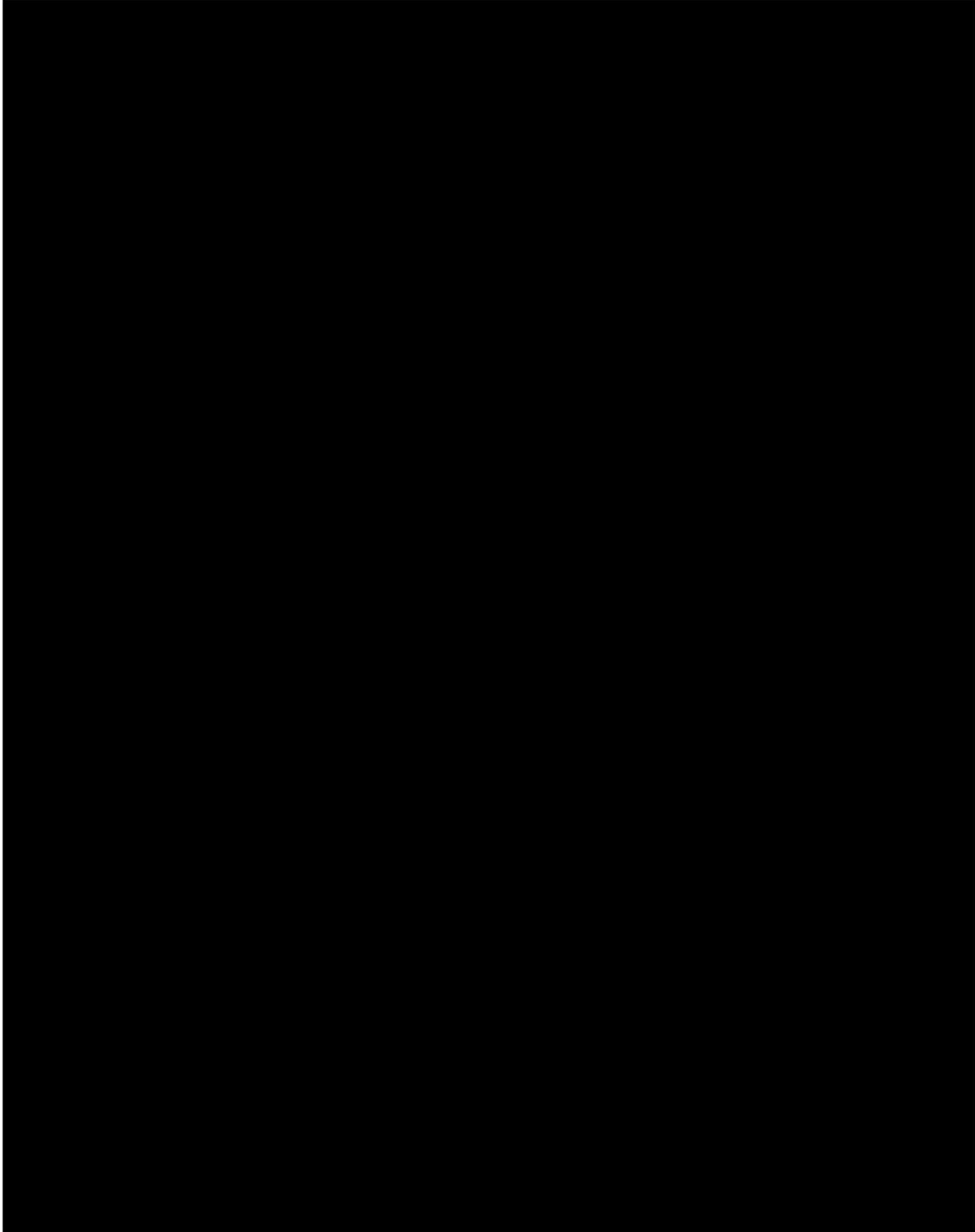


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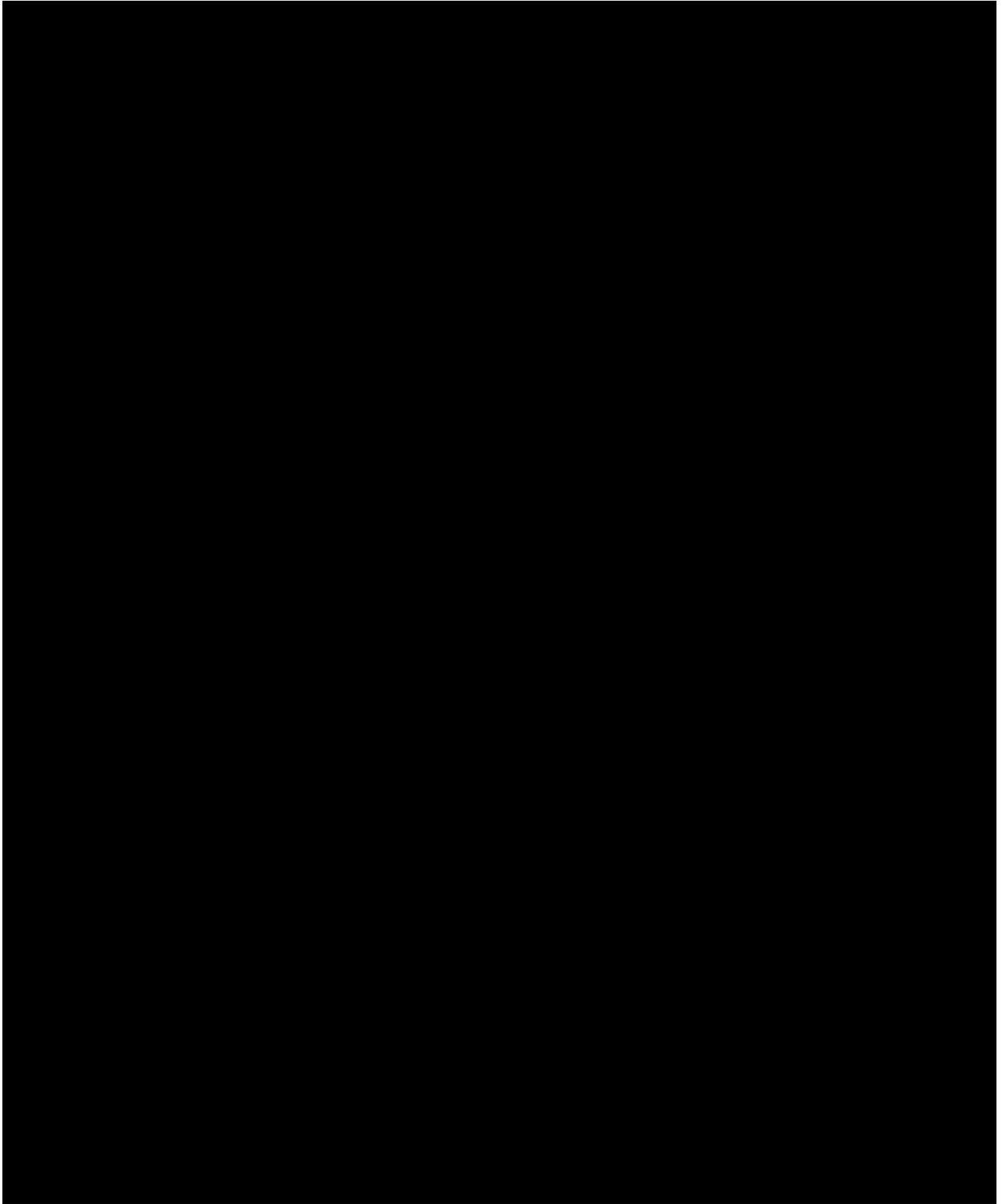


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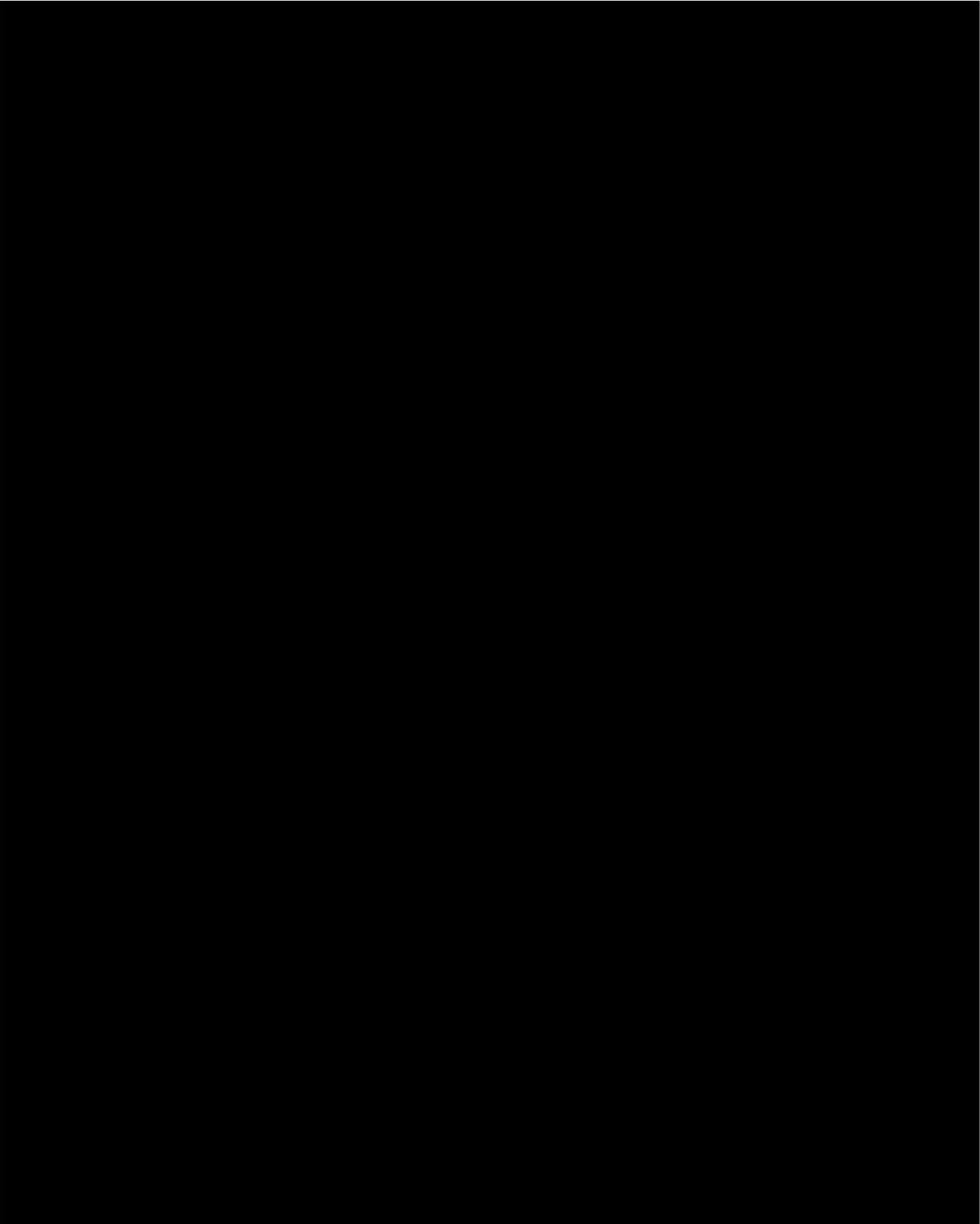


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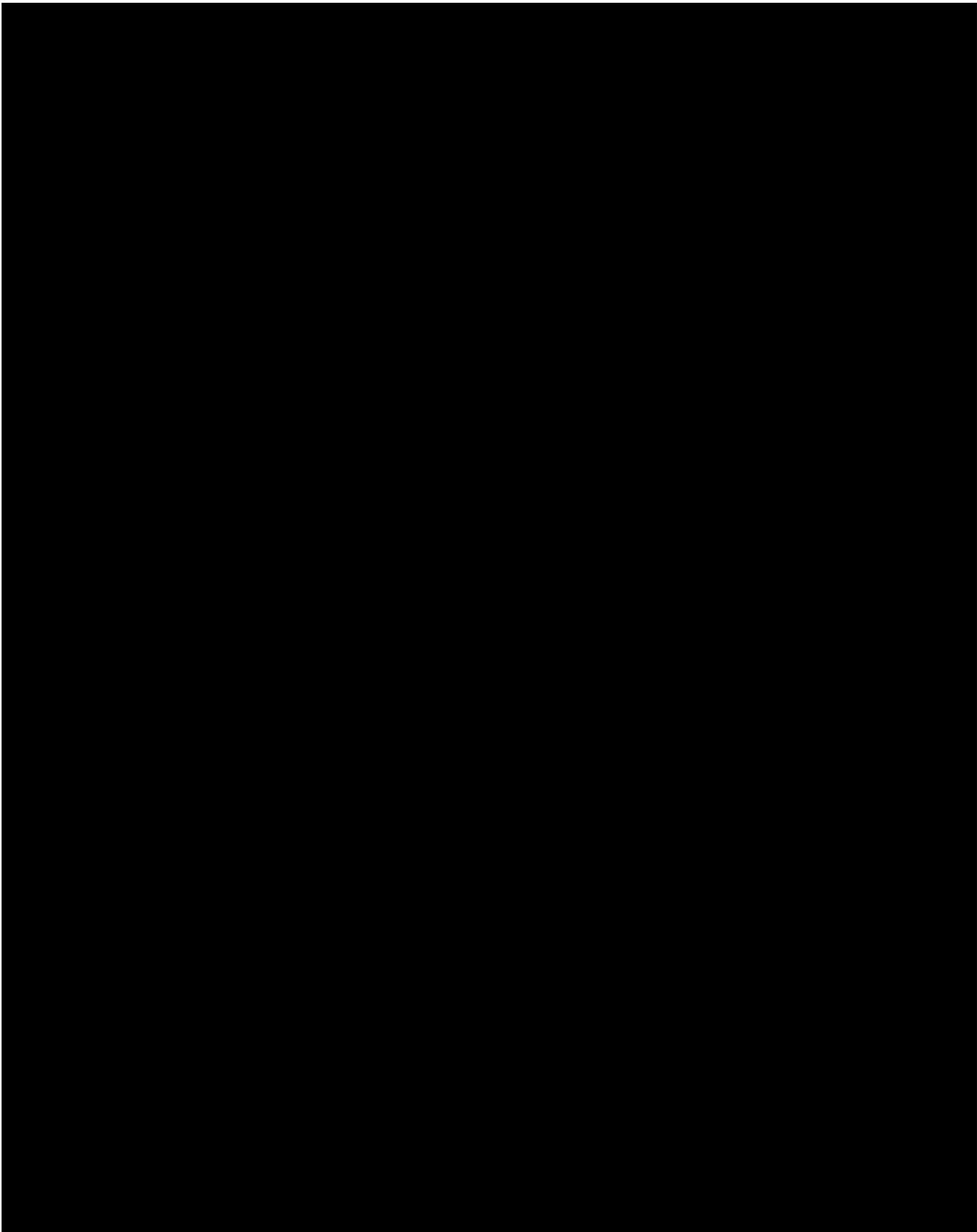
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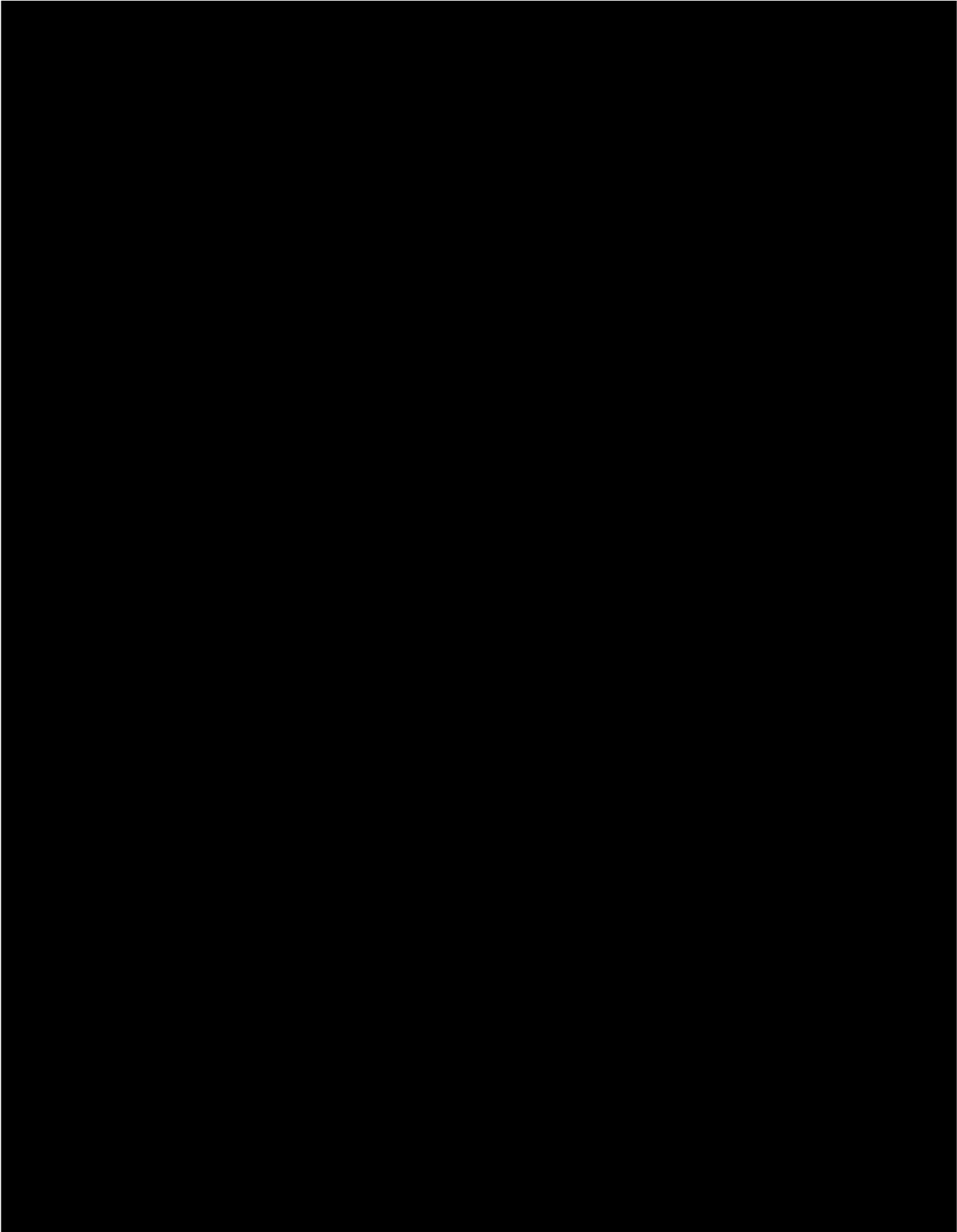


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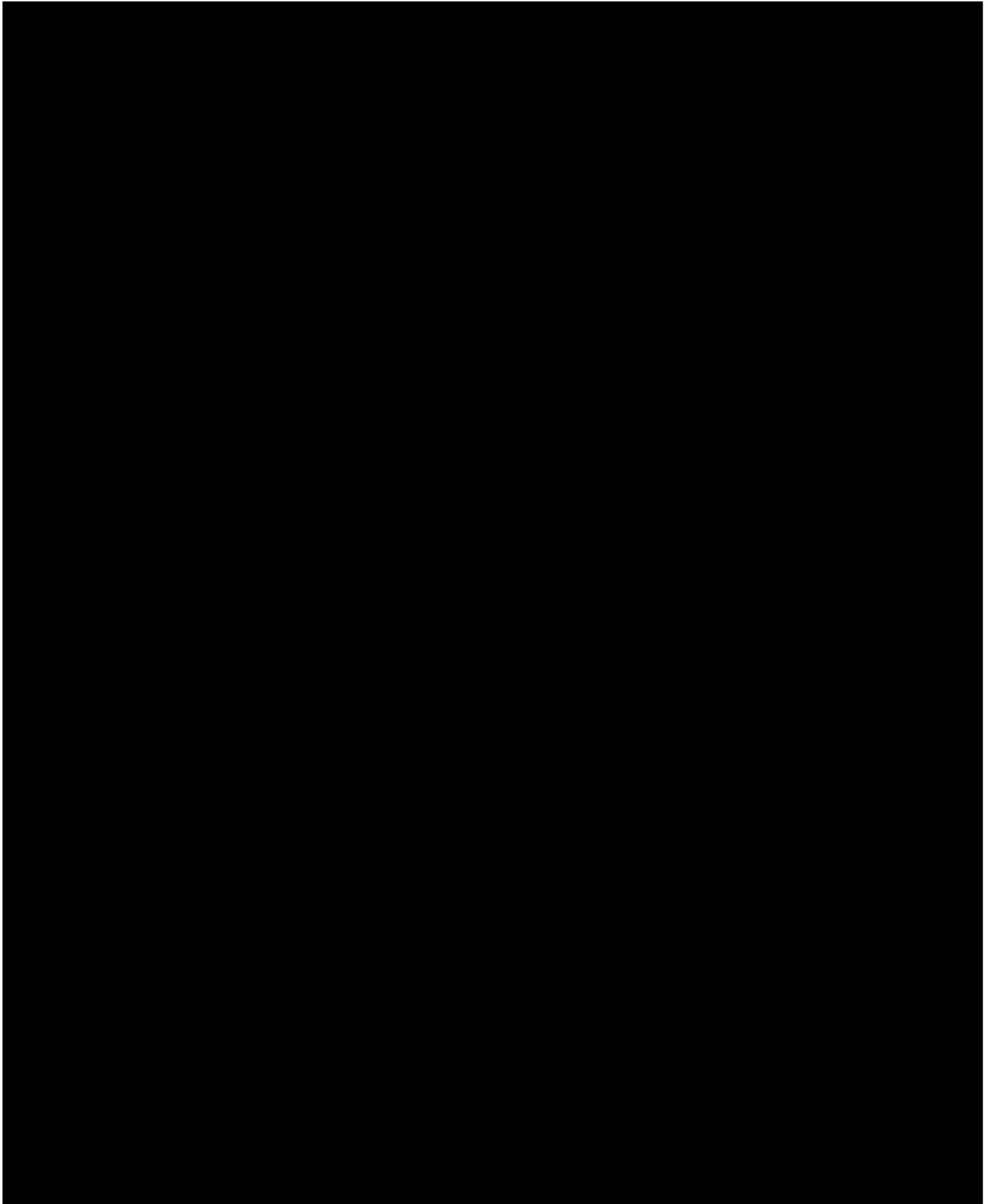
REDACTED



REDACTED



REDACTED



20210001-DEF-000326

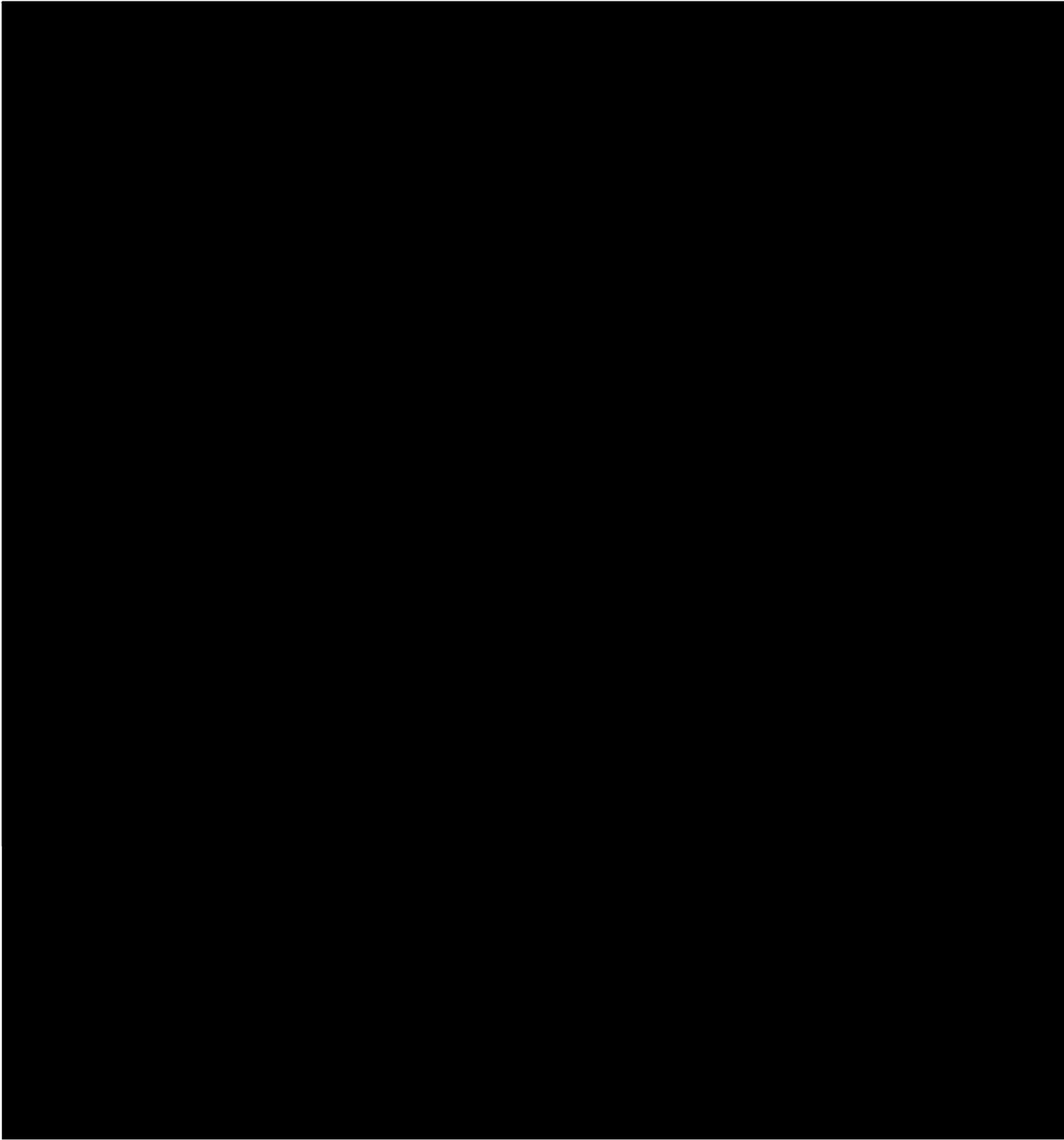
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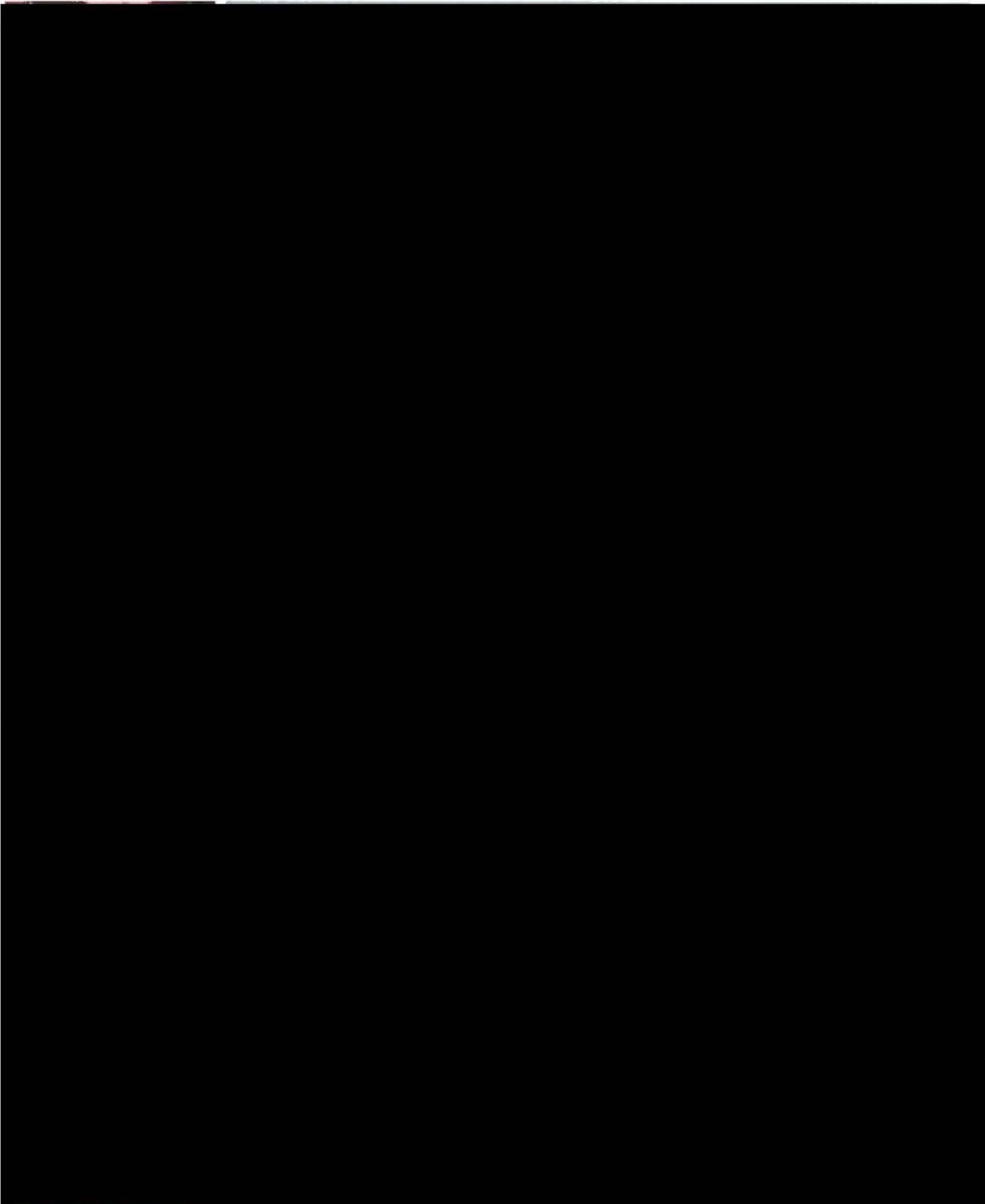
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[Redacted]

[Redacted]

[REDACTED]

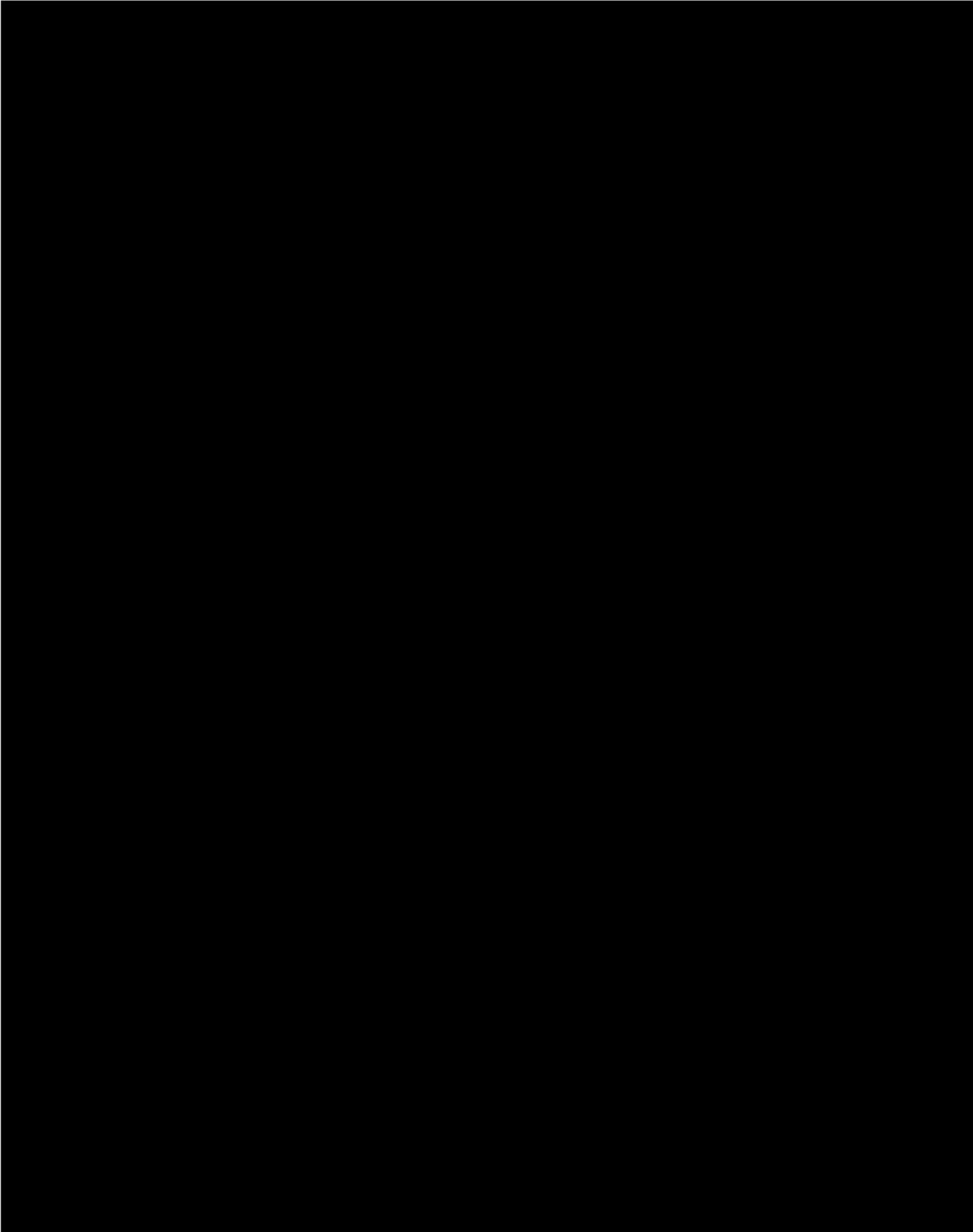




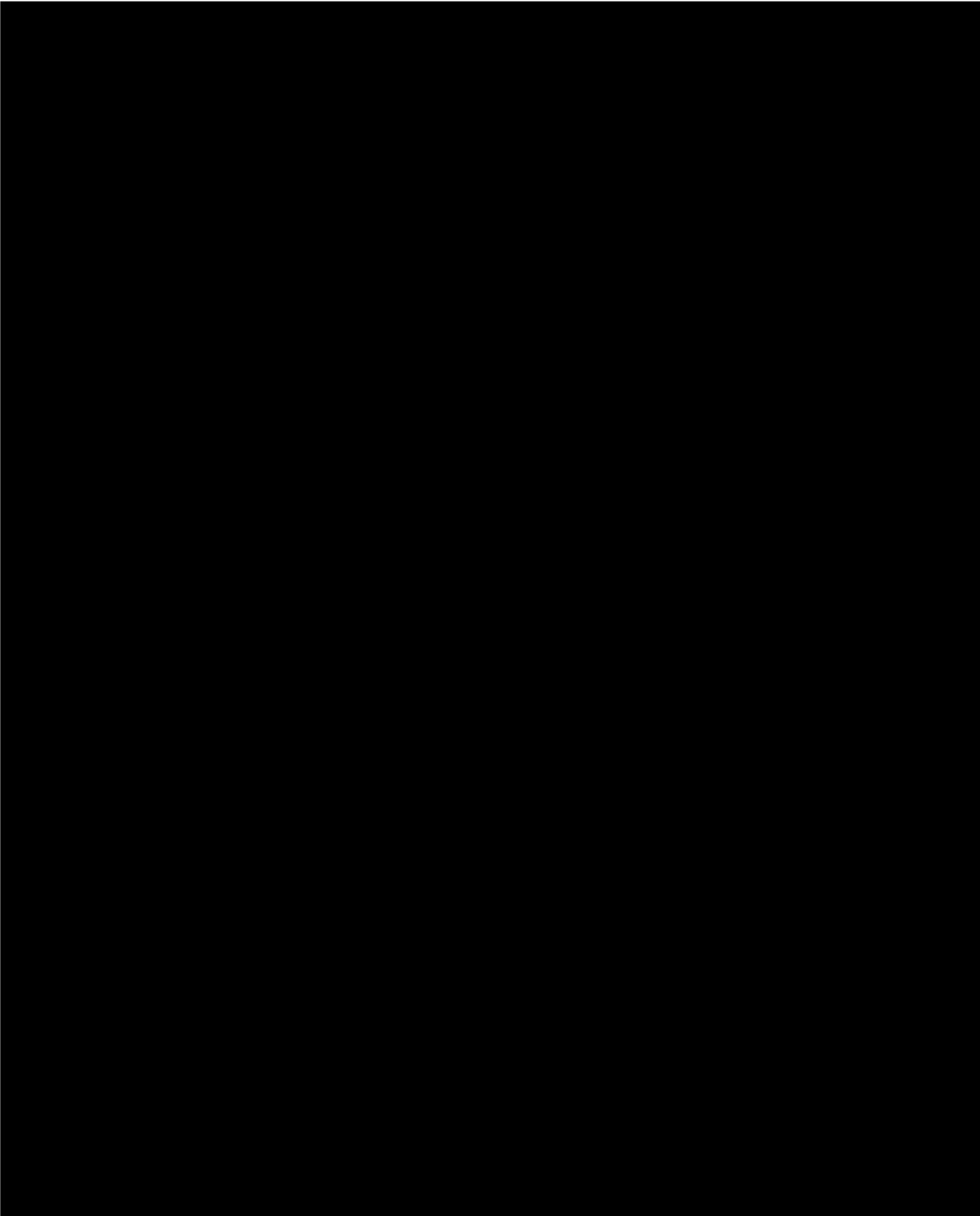
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20210001-DEF-000237

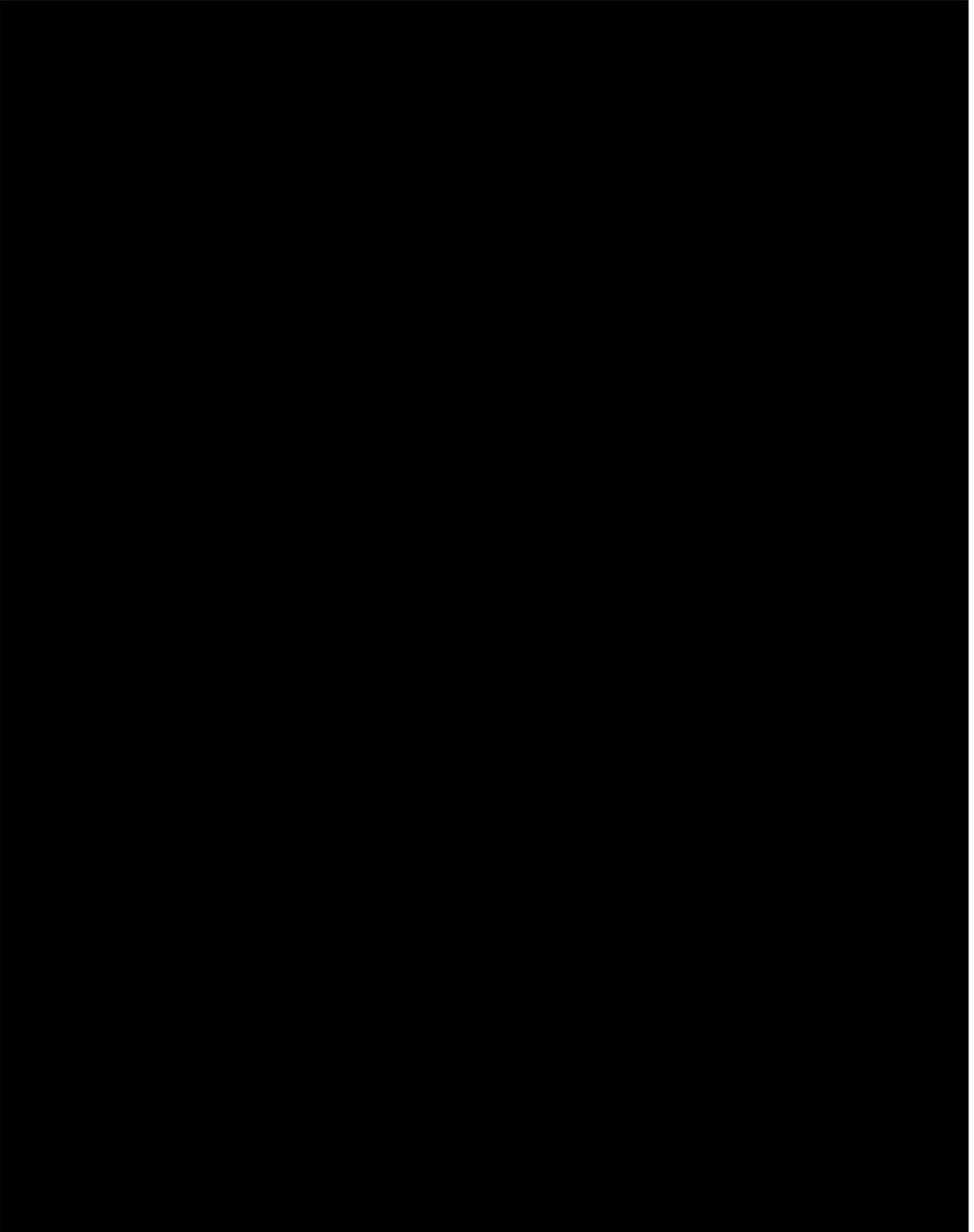
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20210001-DEF-000238

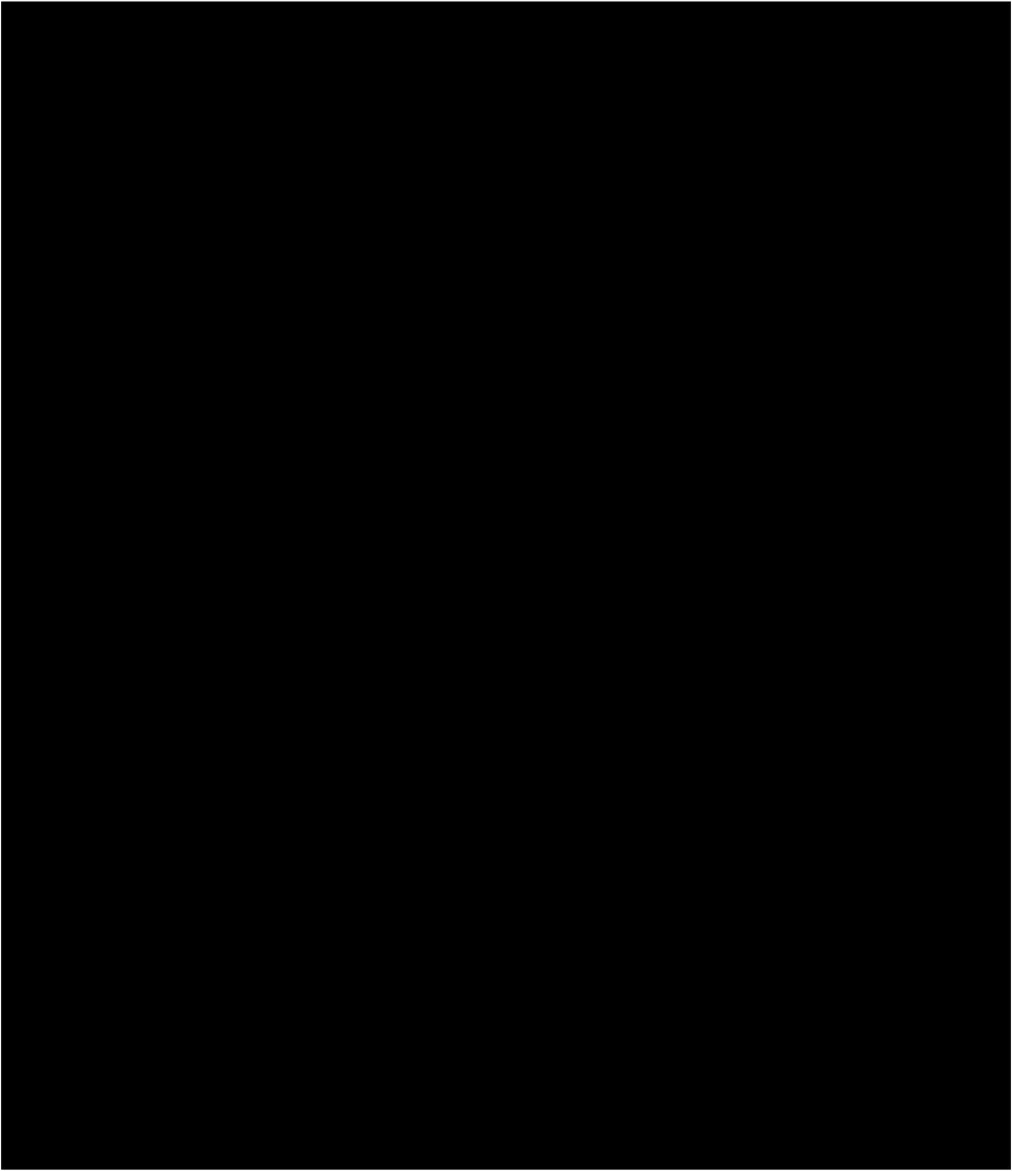


REDACTED



REDACTED

20210001-DEF-000241



PROPERTY INSURANCE POLICY

POLICY OF ALL RISK PROPERTY INSURANCE INCLUDING MACHINERY BREAKDOWN
EFFECTED WITH ASSOCIATED ELECTRIC AND GAS INSURANCE SERVICES LIMITED
HAMILTON, BERMUDA

PLEASE READ THE ENTIRE POLICY CAREFULLY.



DECLARATIONS

POPLICY NUMBER: PO5273408P

DECLARATIONS NUMBER: 1

Original Named Insured: DUKE ENERGY CORPORATION, and any subsidiary thereof including Duke Energy Carolinas, LLC; Duke Energy Progress, LLC; Duke Energy Florida, LLC. and their financially controlled or actively managed organizations including partnerships, limited liability companies (LLC's), limited partnerships (LP's), joint ventures, and any other entities, persons, organizations or properties in their entirety which any of the above have agreed to insure as now exist or may hereafter be constituted or acquired.

Named Reinsured: Bison Insurance Company Limited, 146 Fairchild Street, Suite 135, Charleston, SC 29492; Mailing Address: 550 South Tryon Street, DEC-40C, Charlotte, NC 28202

1. TERM OF INSURANCE

Primary: [REDACTED]

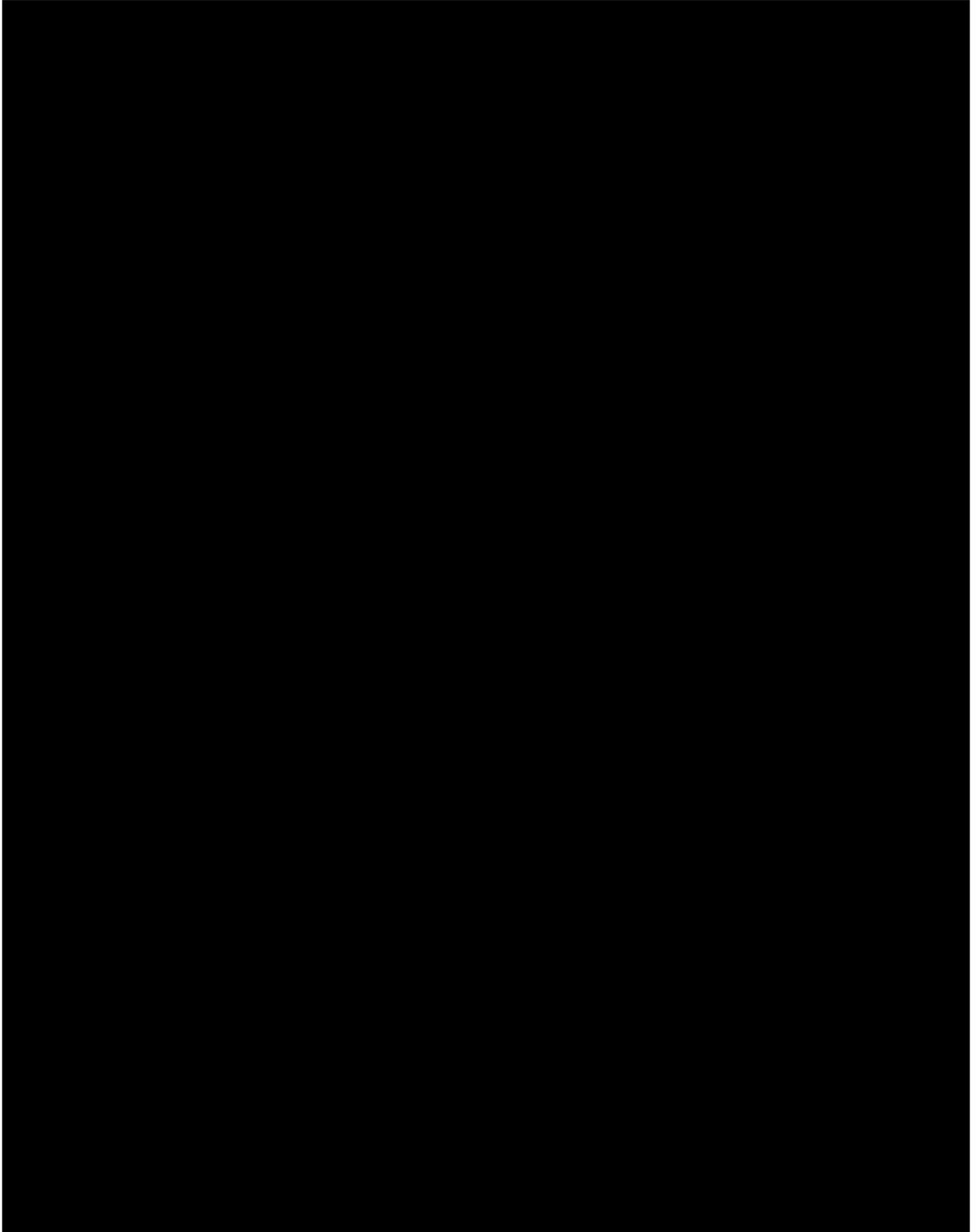
In consideration of [REDACTED] (100%) this policy attaches and covers from **May 1, 2020** to **May 1, 2021** beginning and ending at 12:01 a.m. standard time, at the location of the property involved.

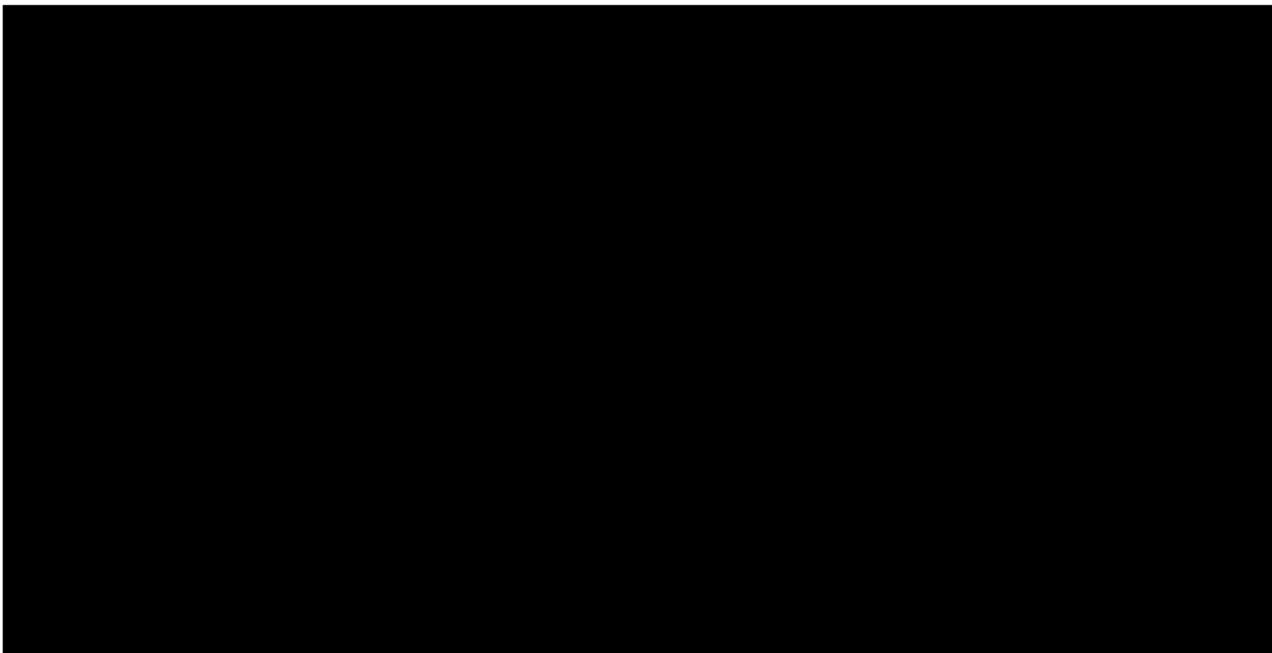
2. PARTICIPATION

This policy covers for a specified percent interest in this insurance, and this Insurer shall not be liable for more than specified percent of the limits of liability set forth herein.

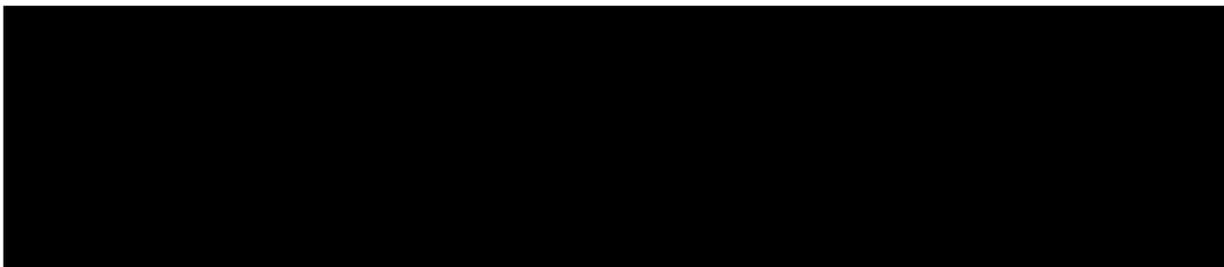
Primary: [REDACTED] part of \$650,000,000 per occurrence

3. **LIMIT OF LIABILITY**

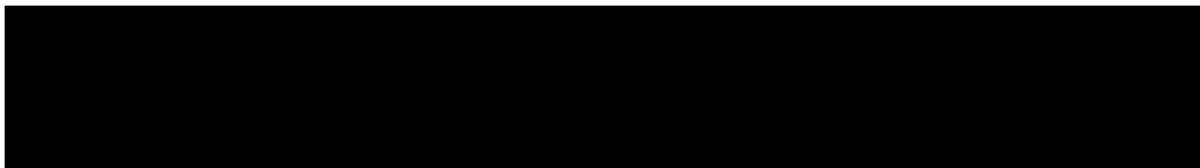




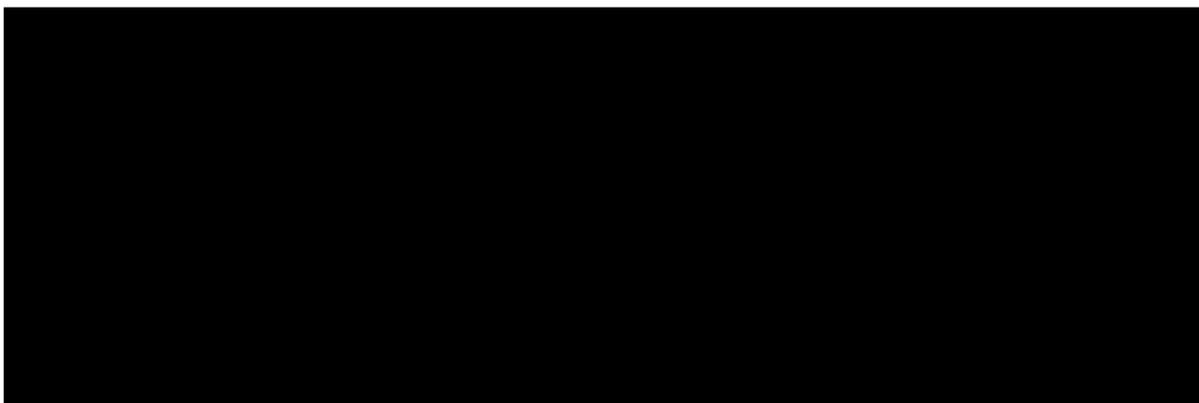
4. **DEDUCTIBLES**

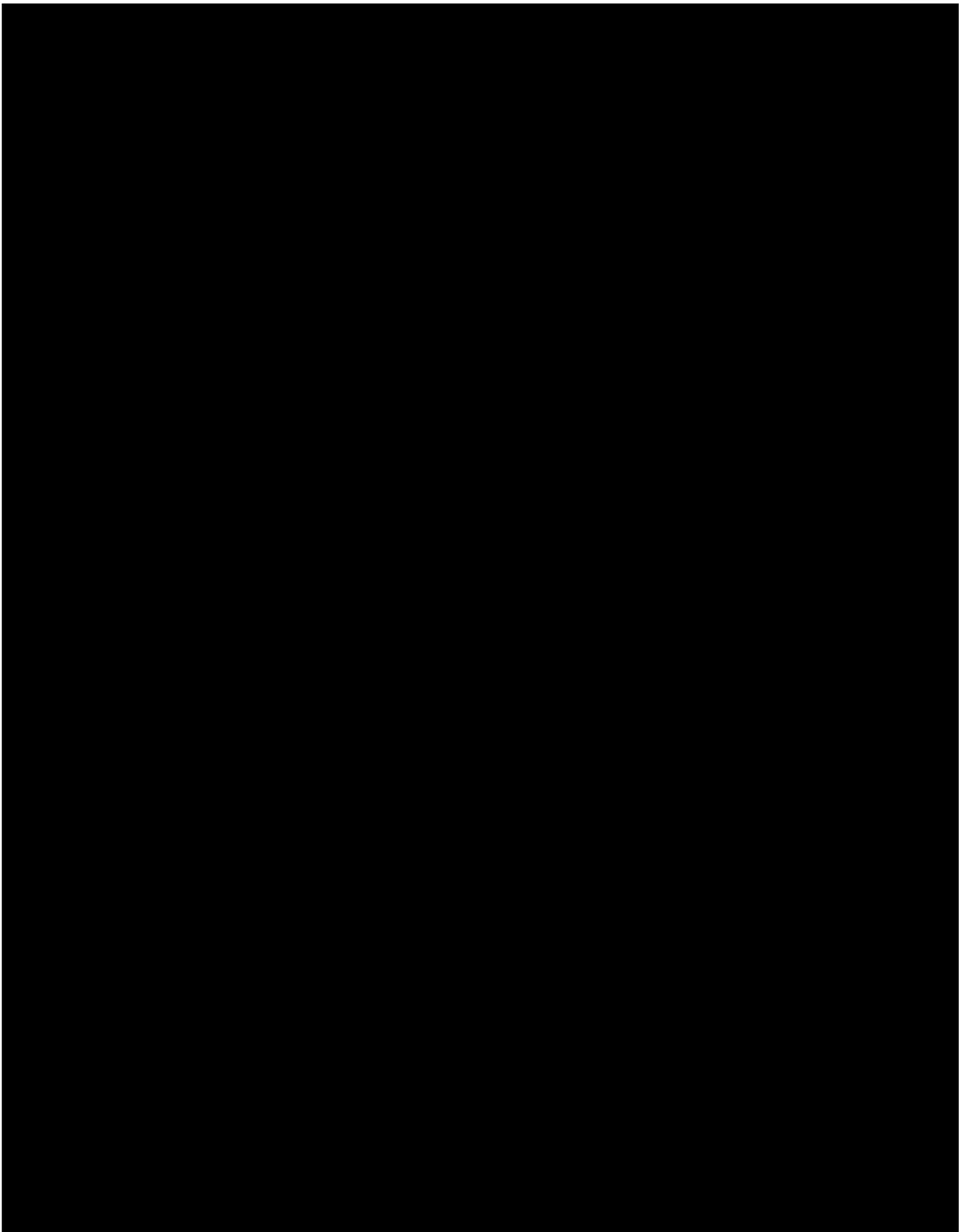


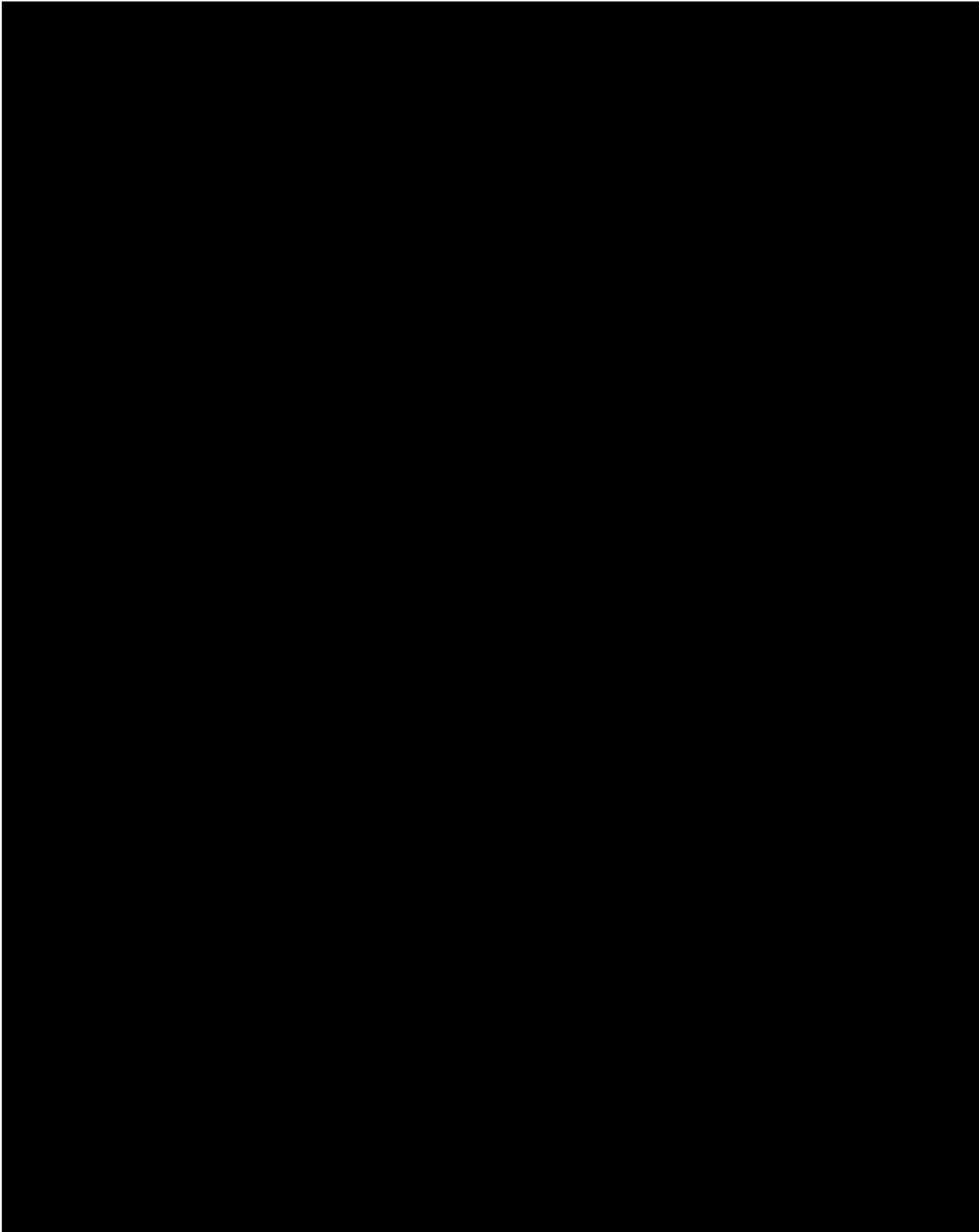
5. **LOSS PAYABLE**

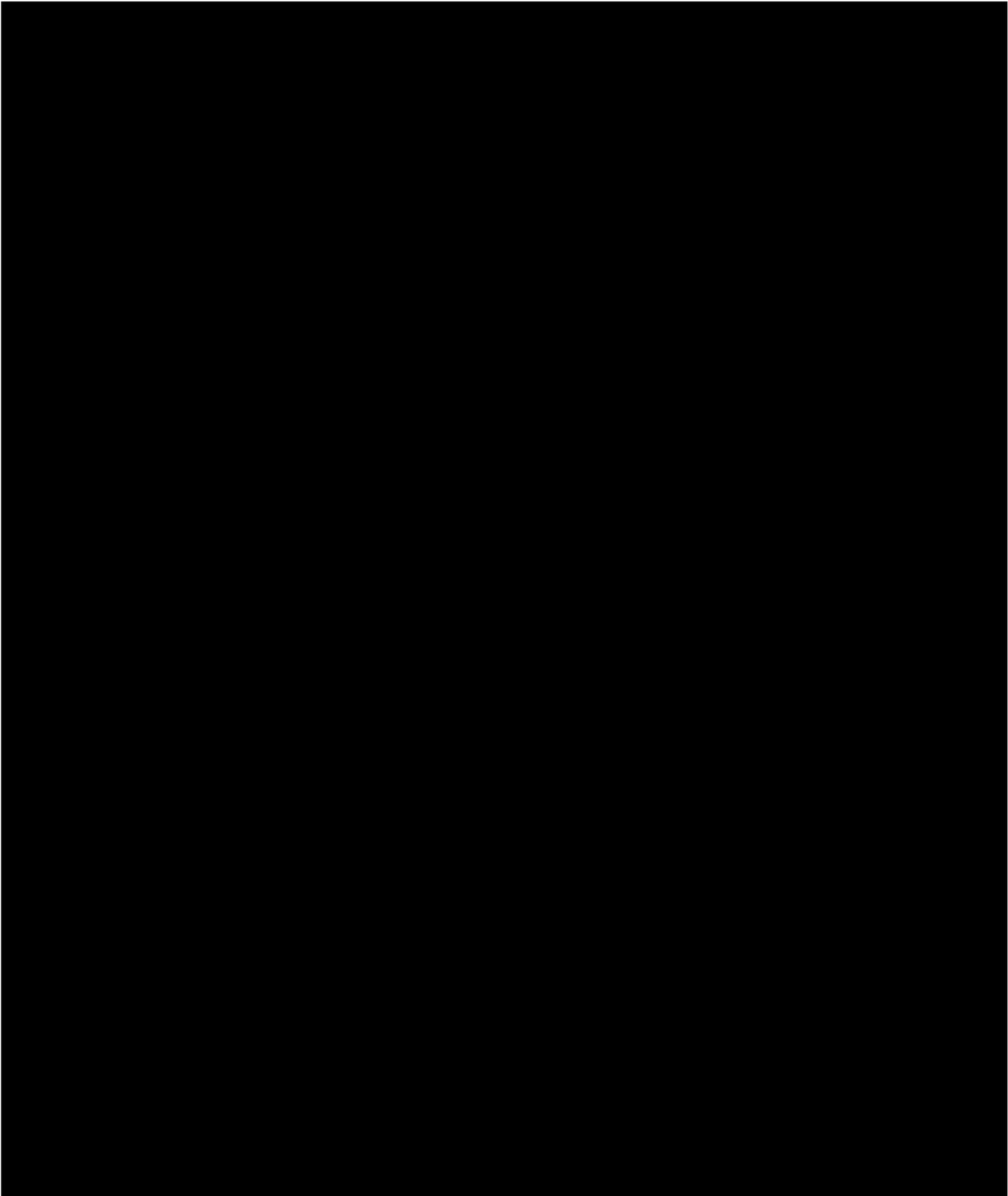


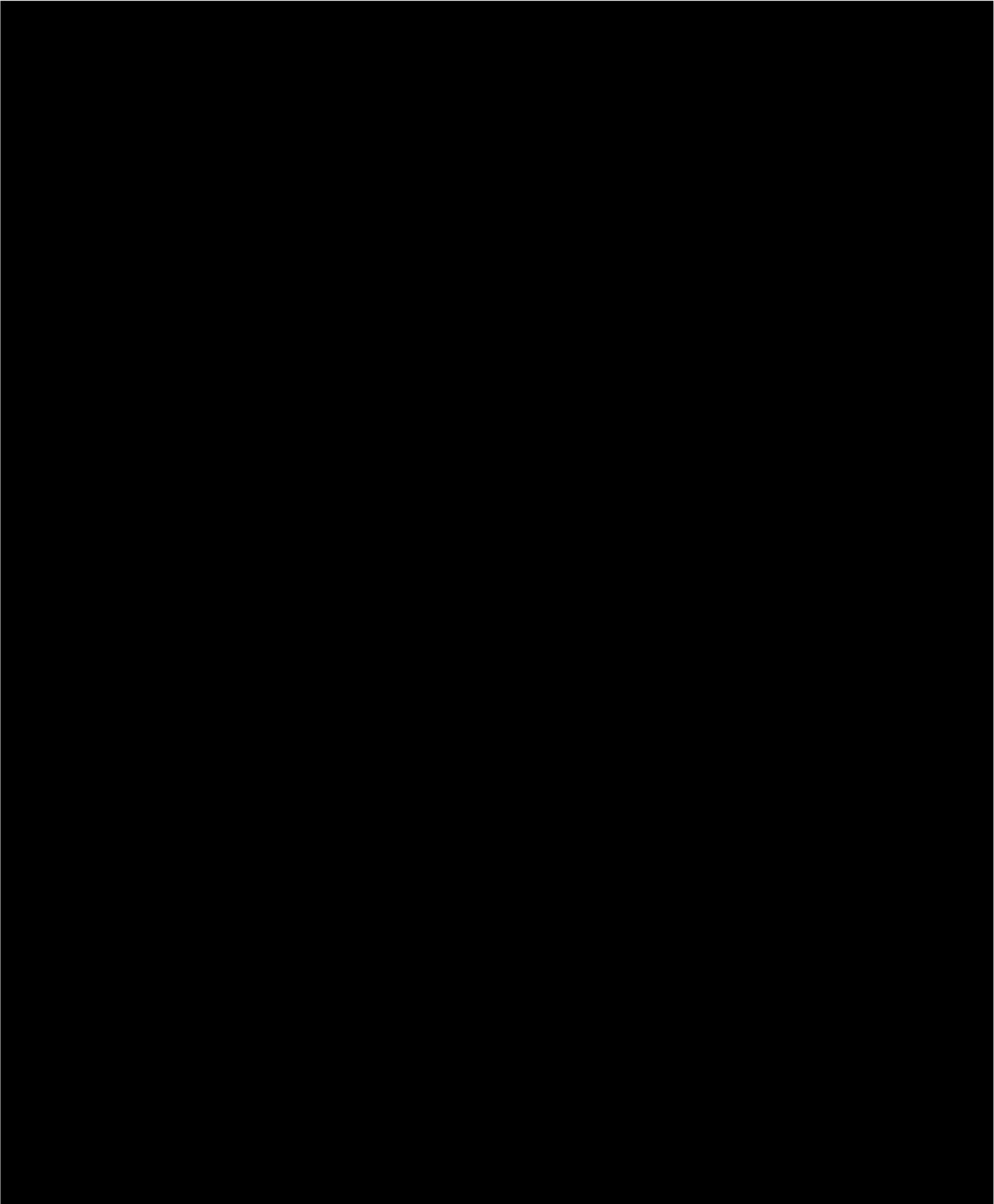
6. **TERRITORY**

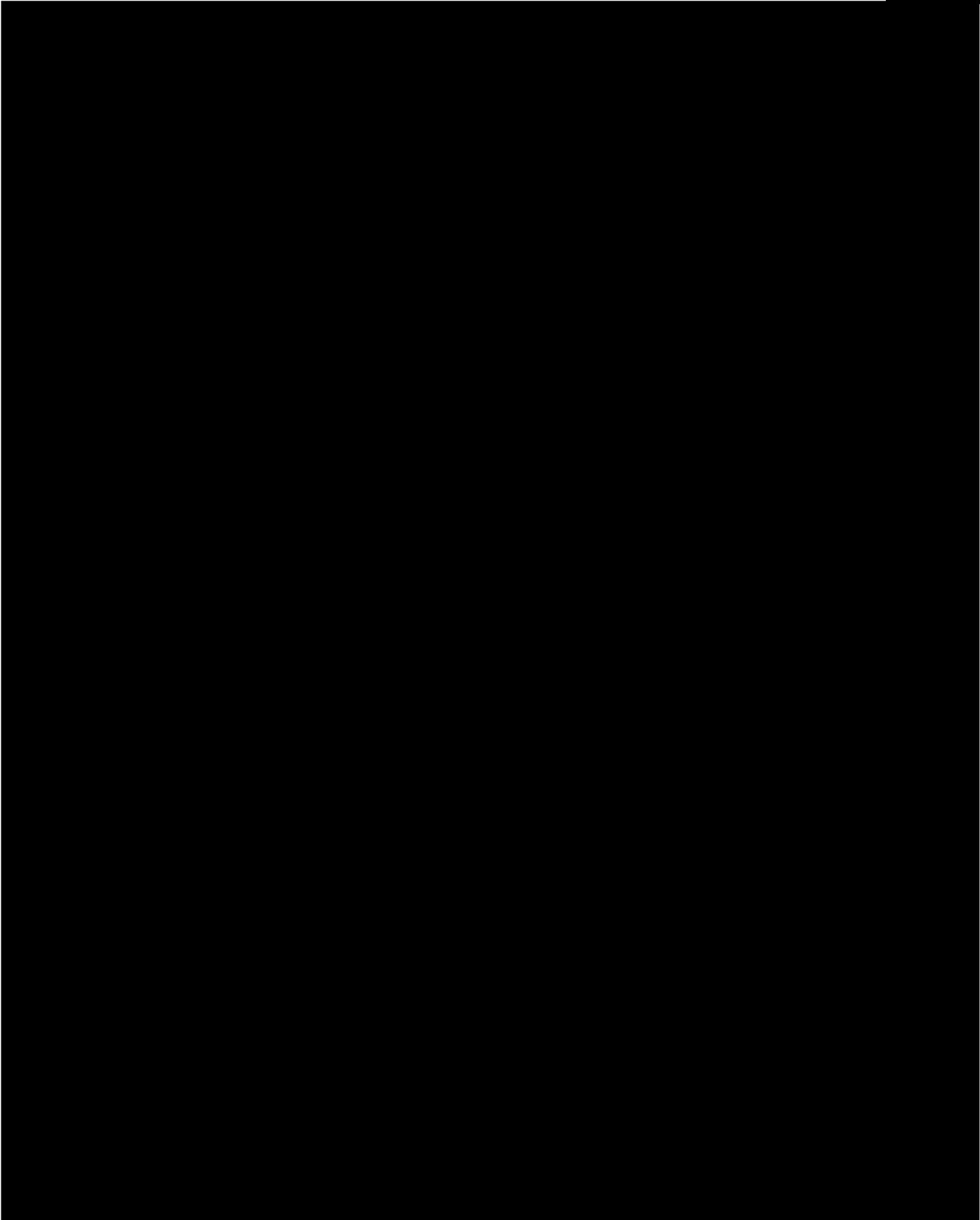


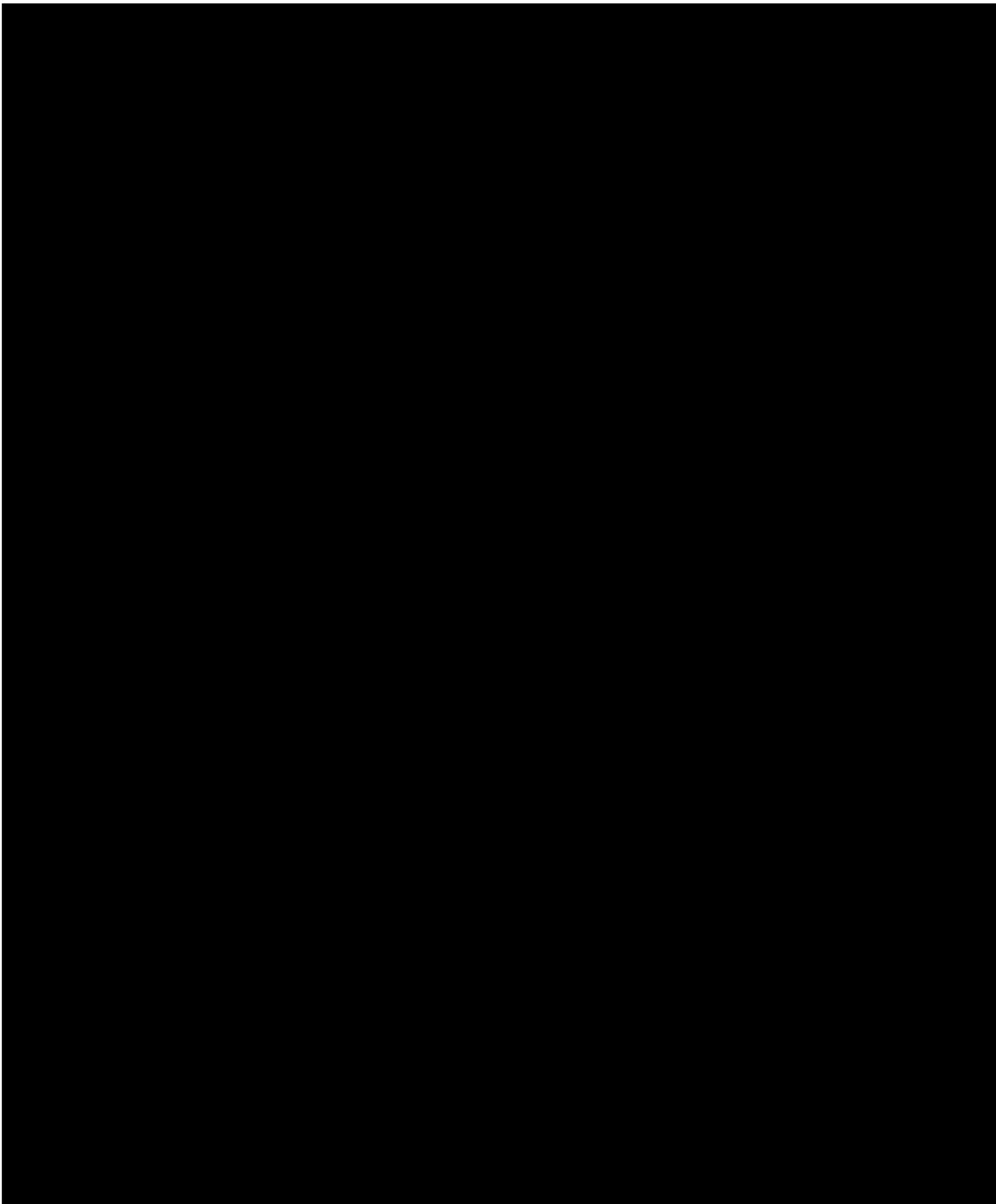


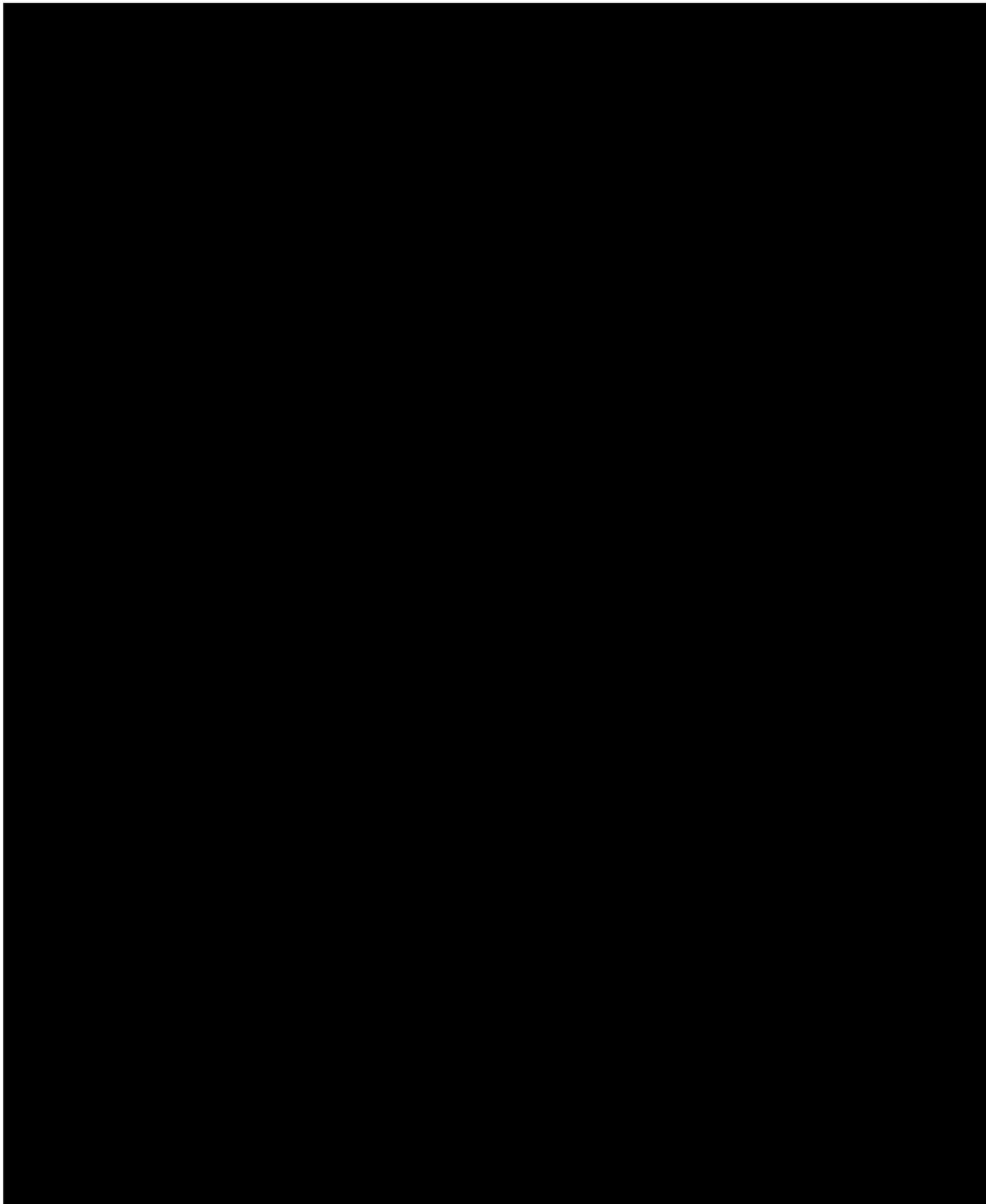


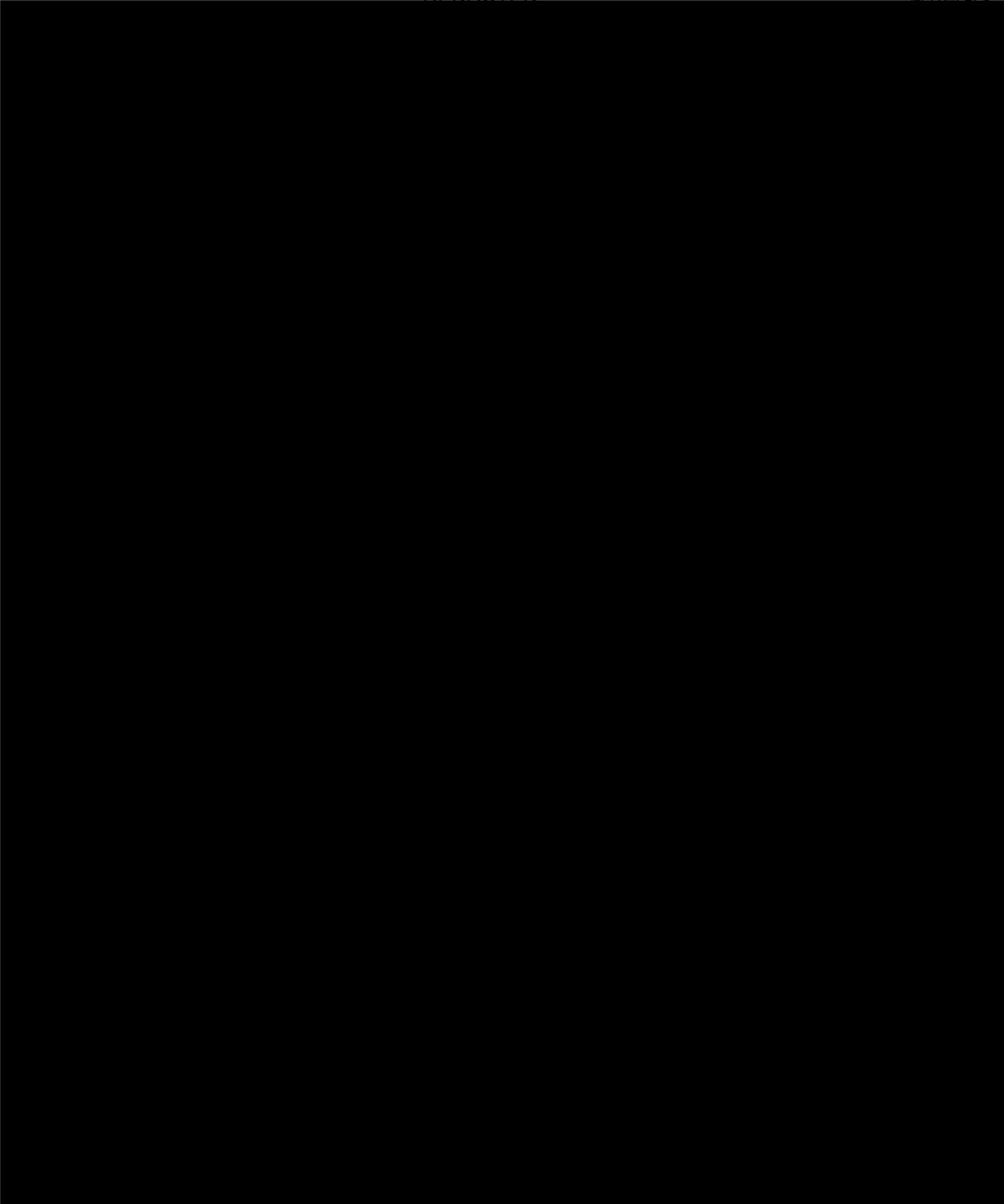




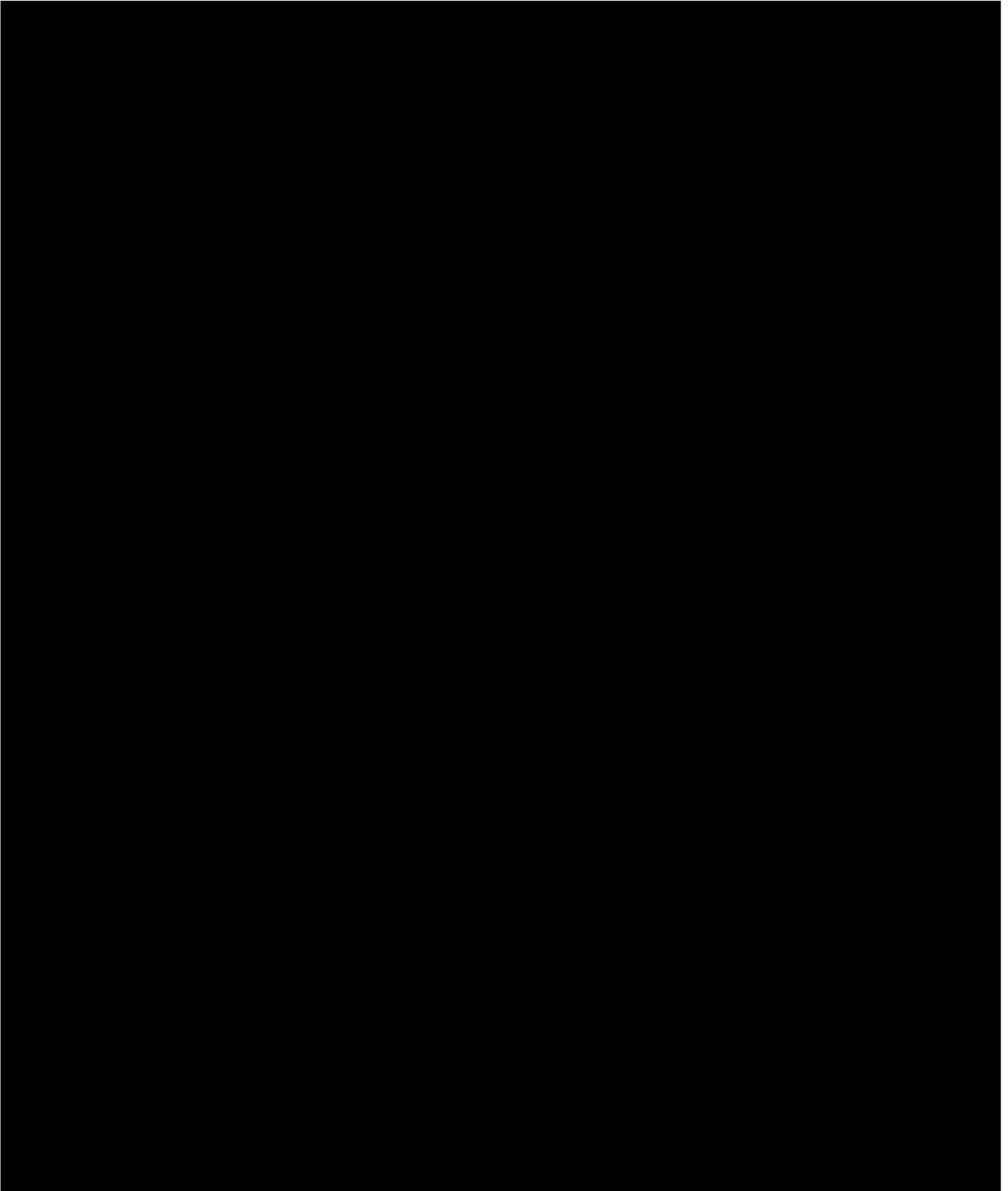


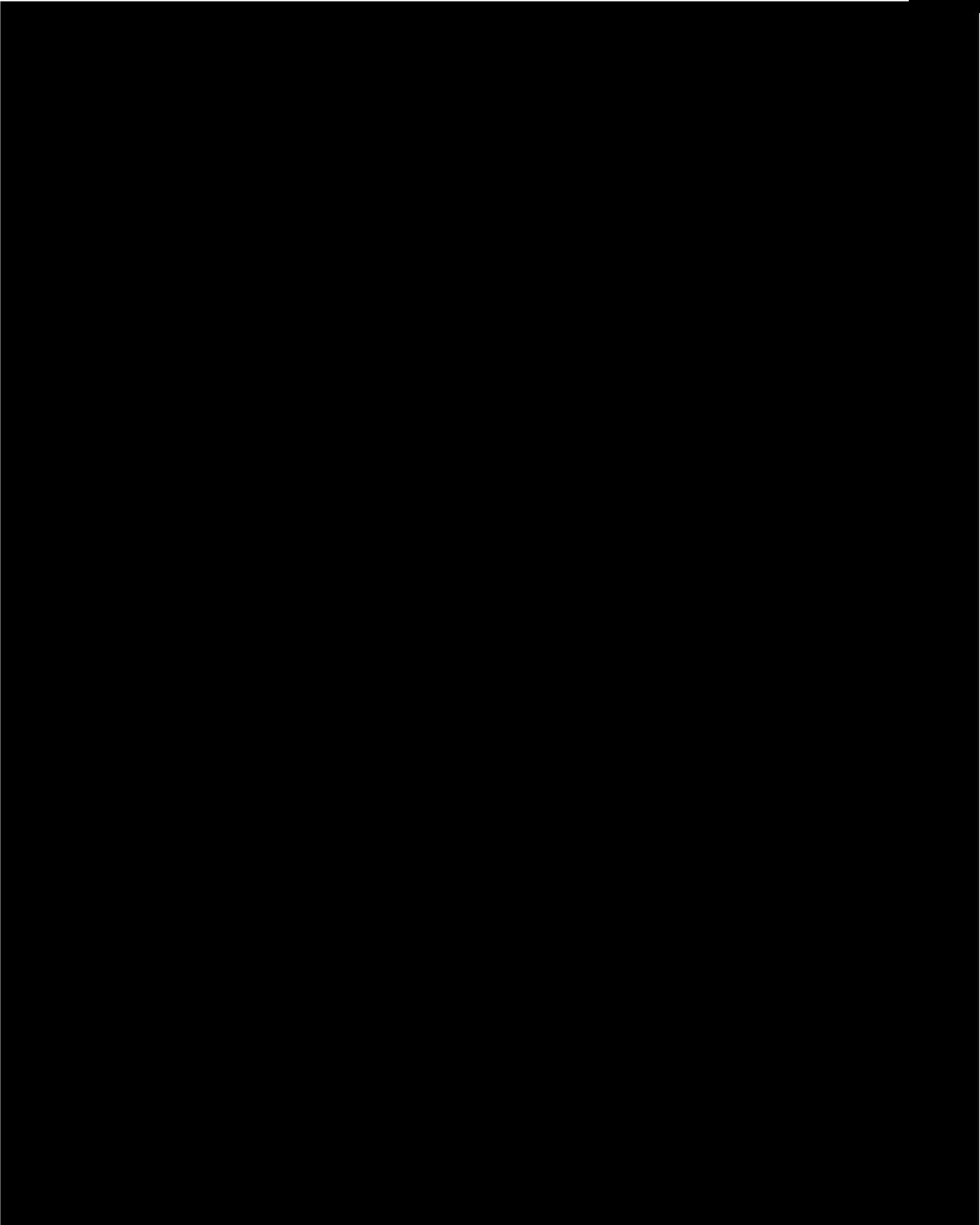


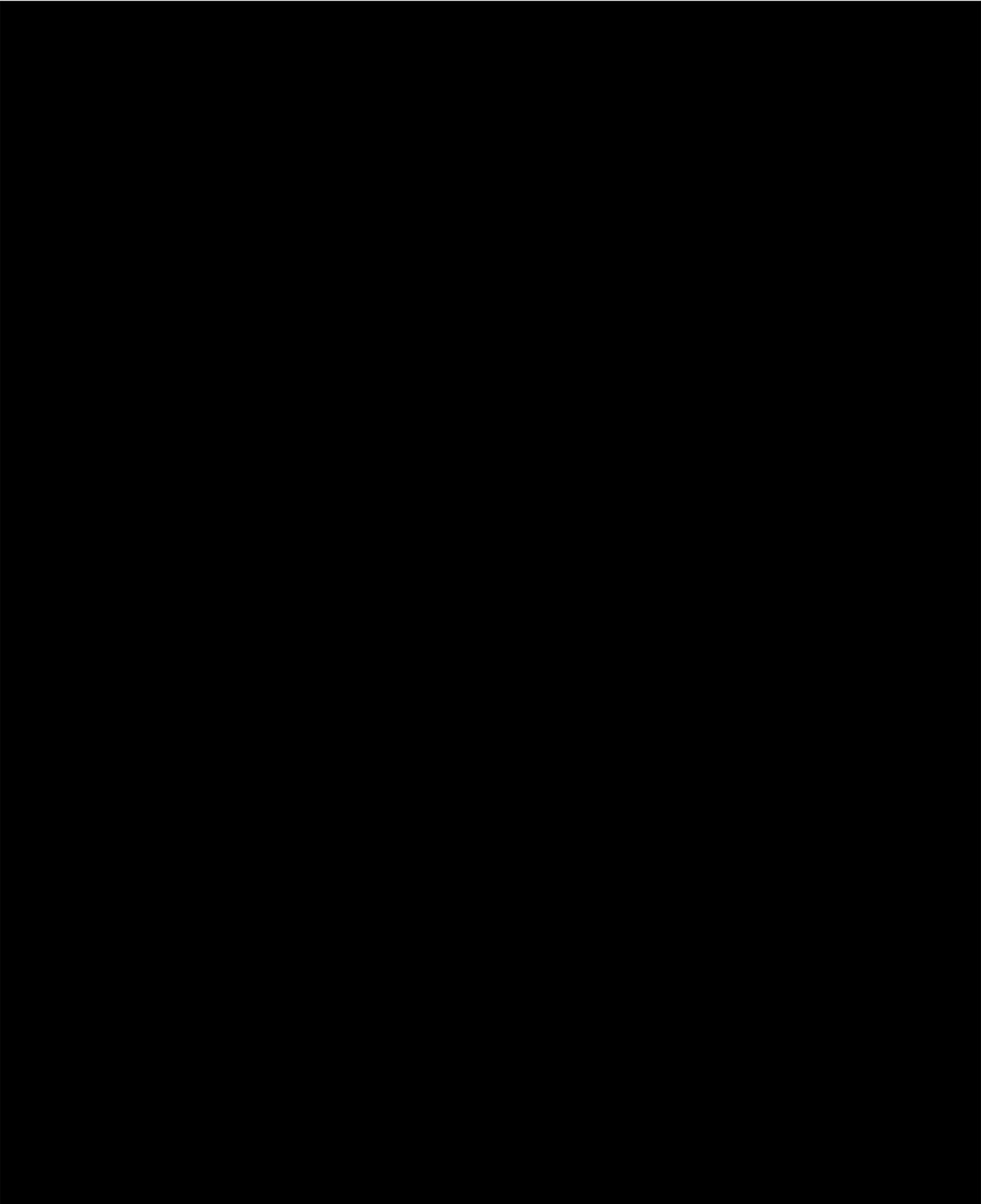




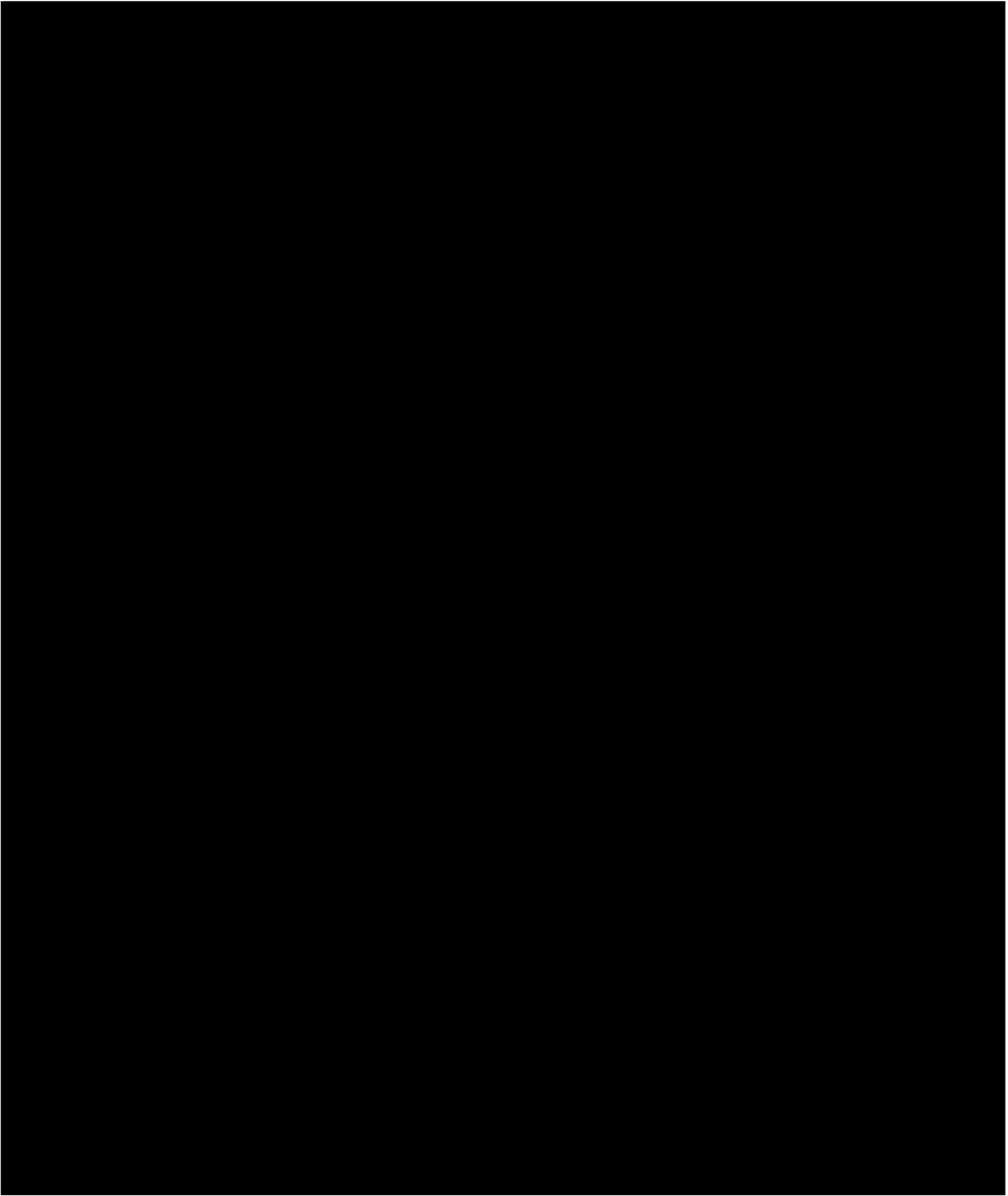
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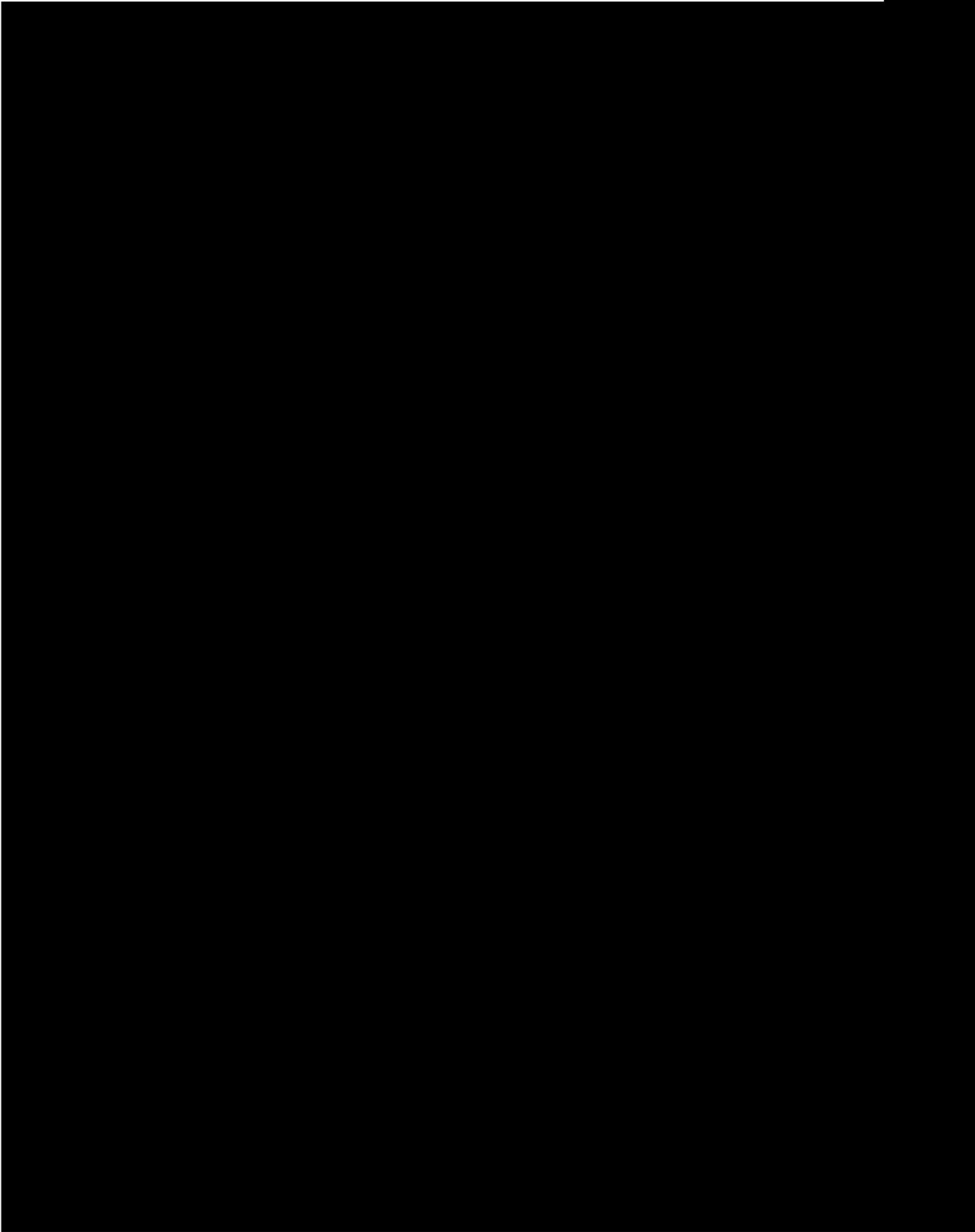


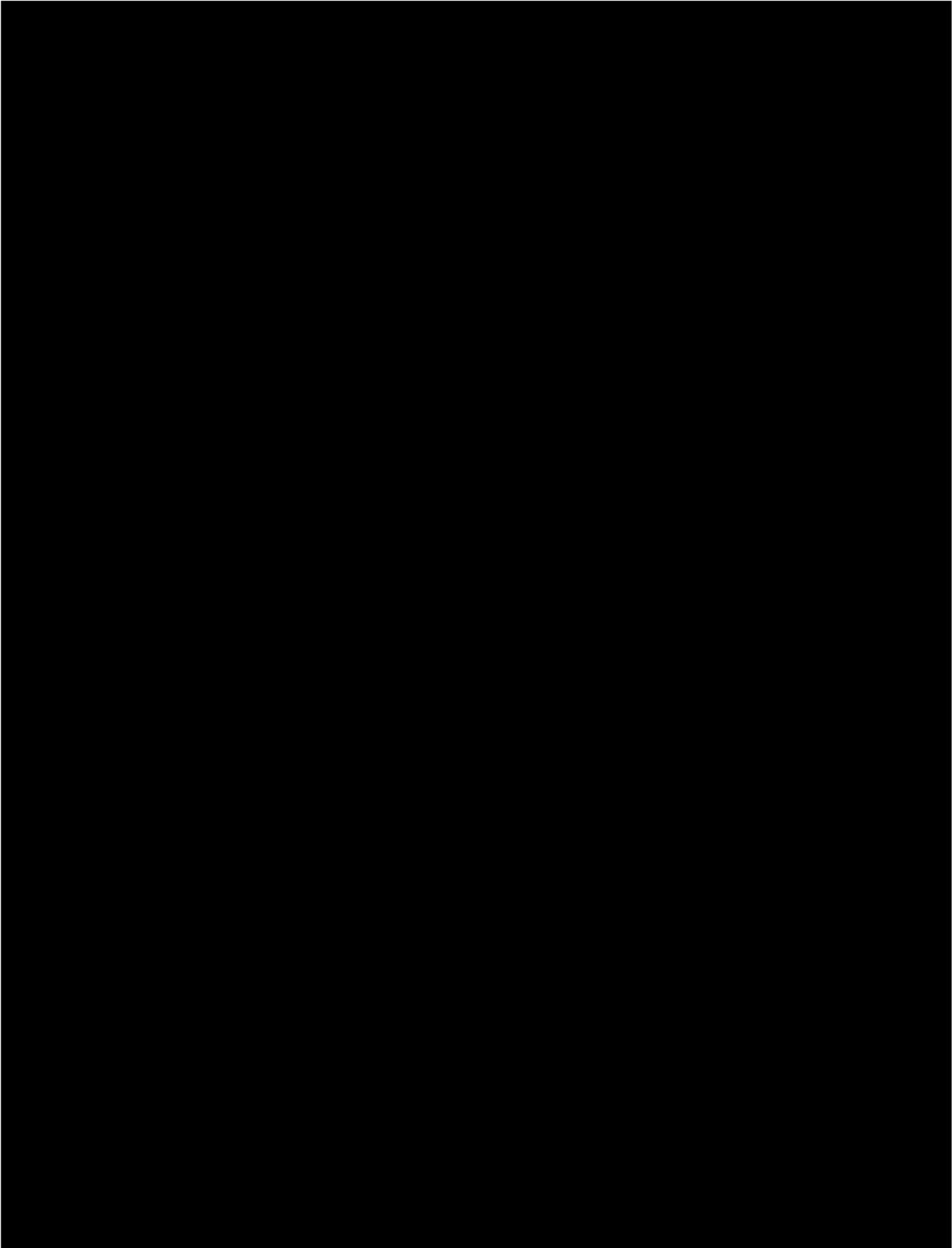


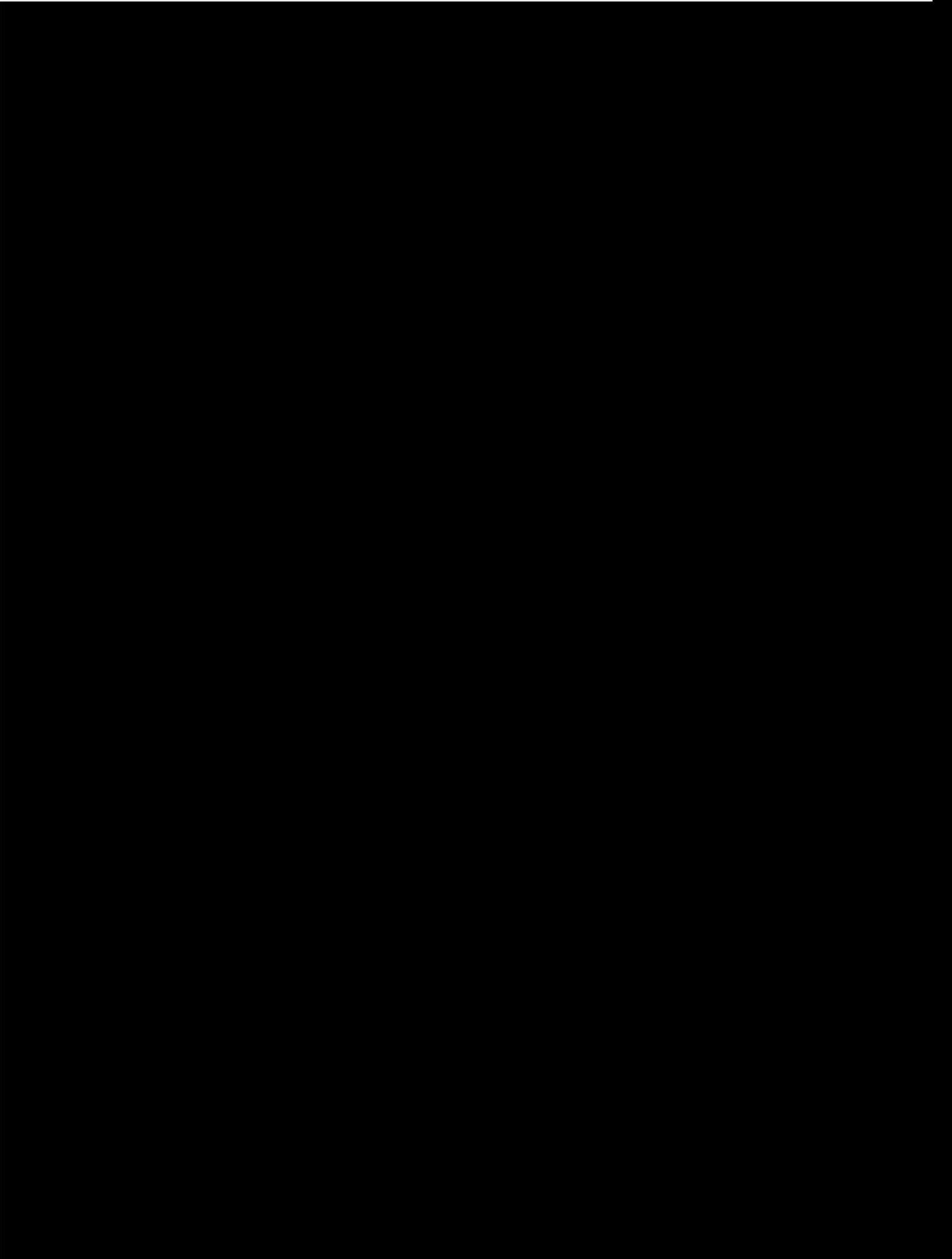


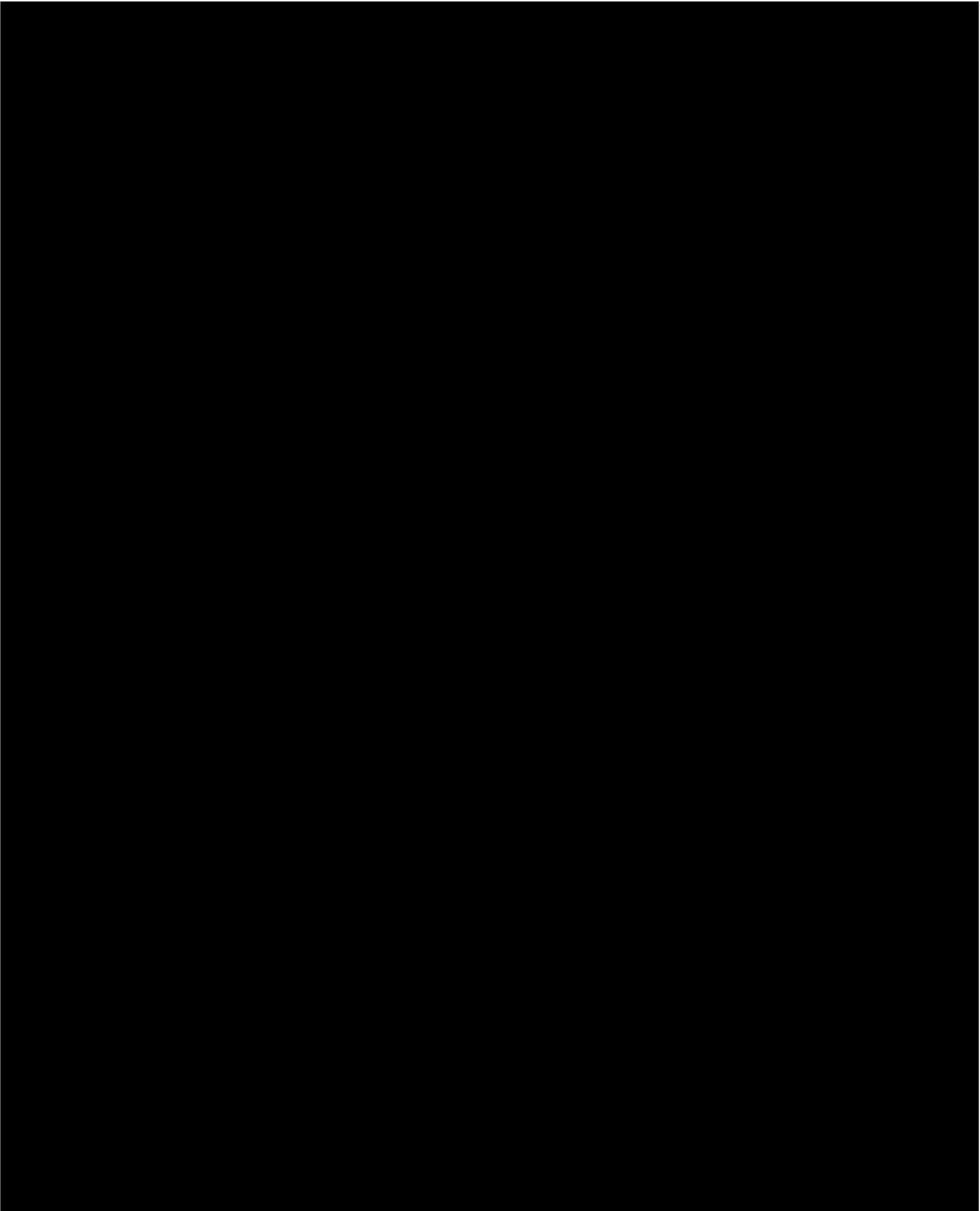


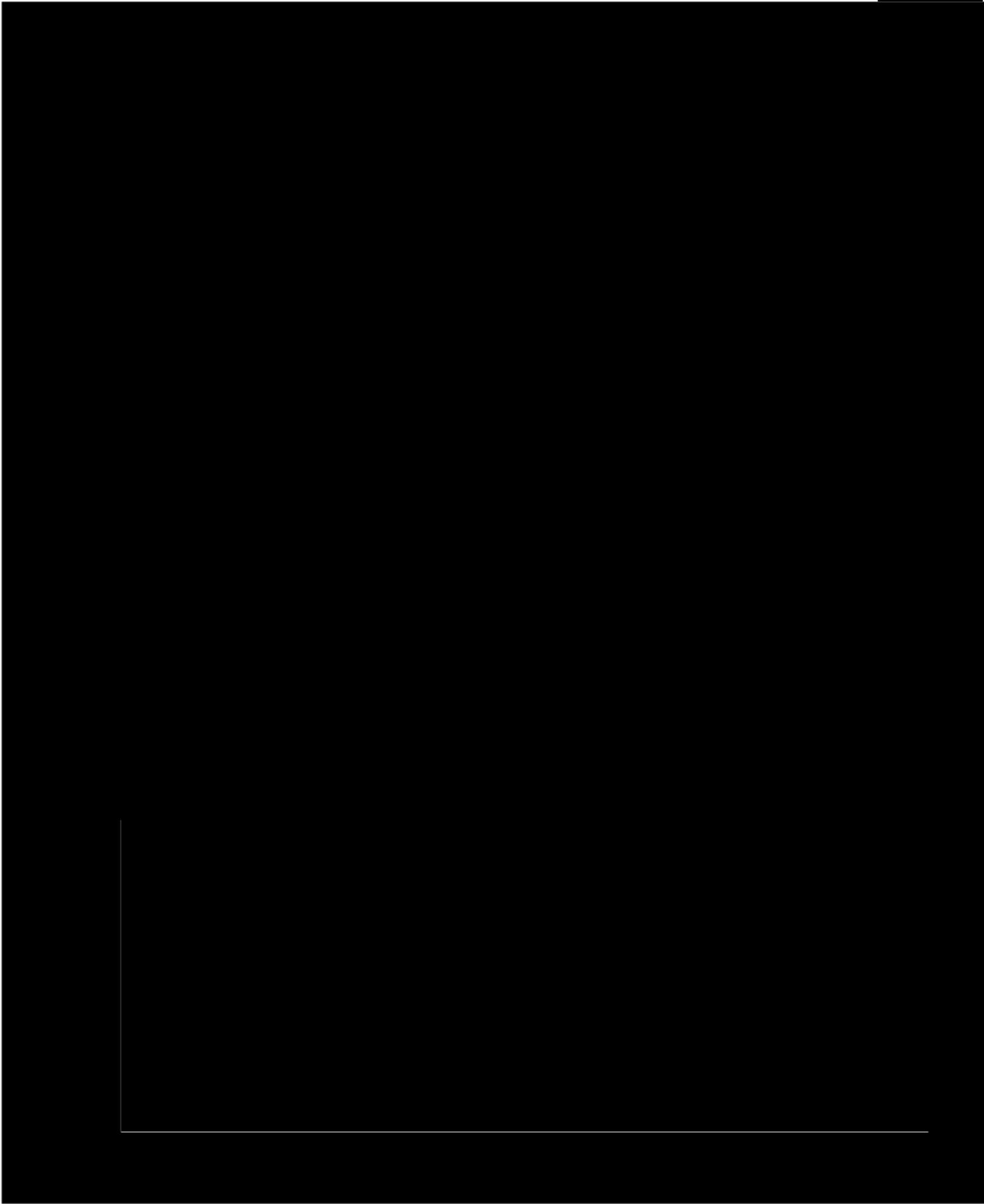


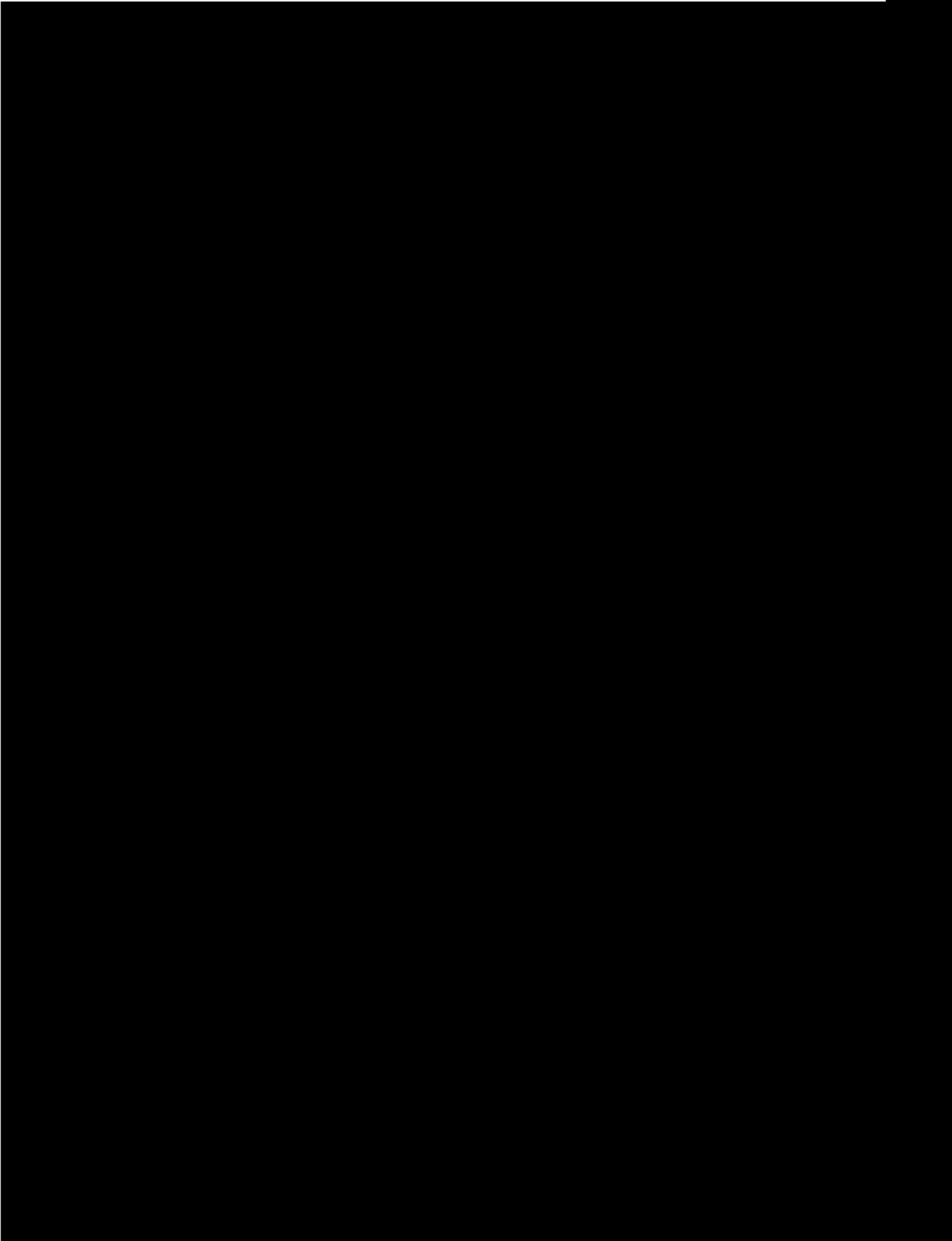


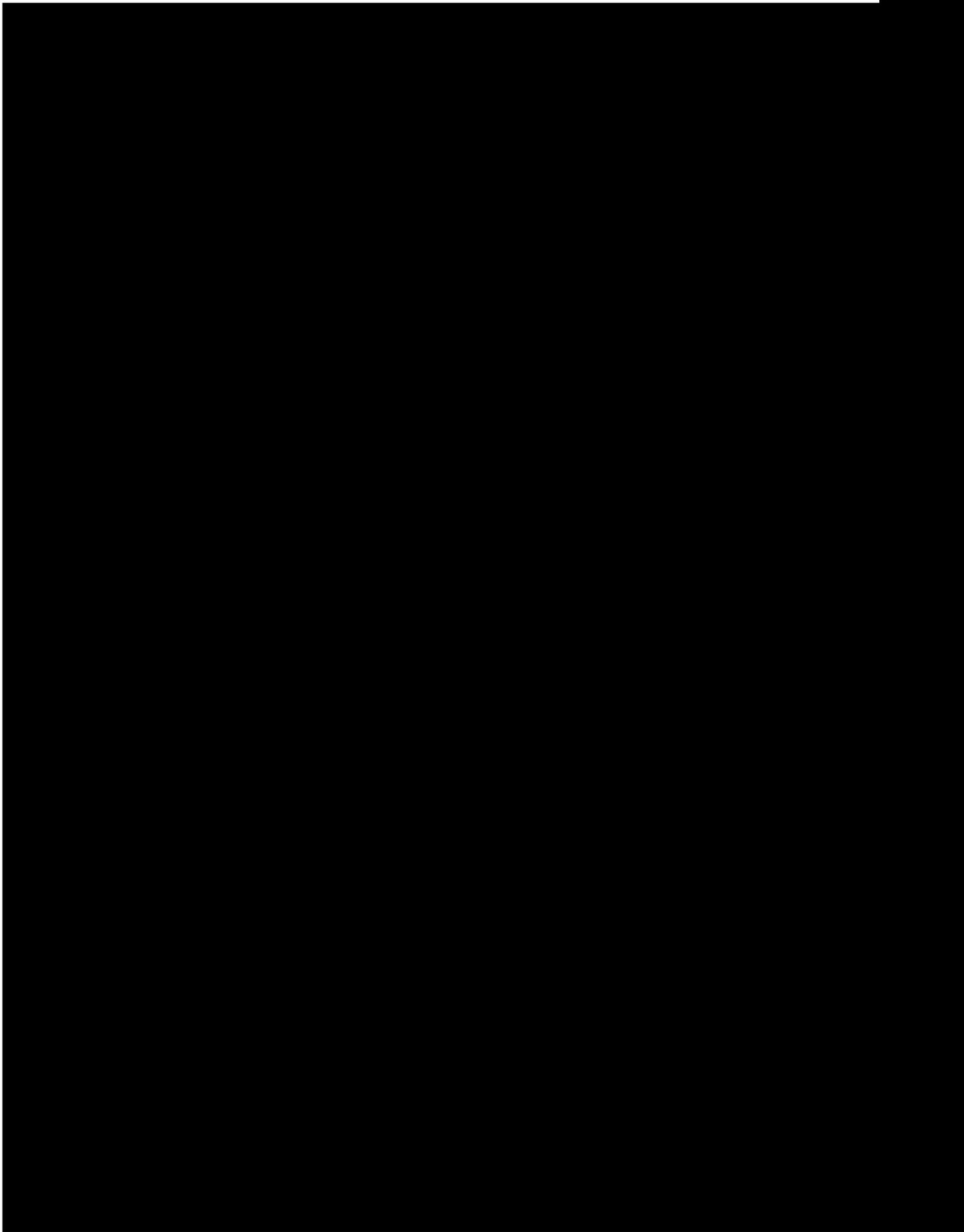












BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Recovery Clause and Generating
Performance Incentive Factor

Docket No. 20210001-EI
Filed: October 21, 2021

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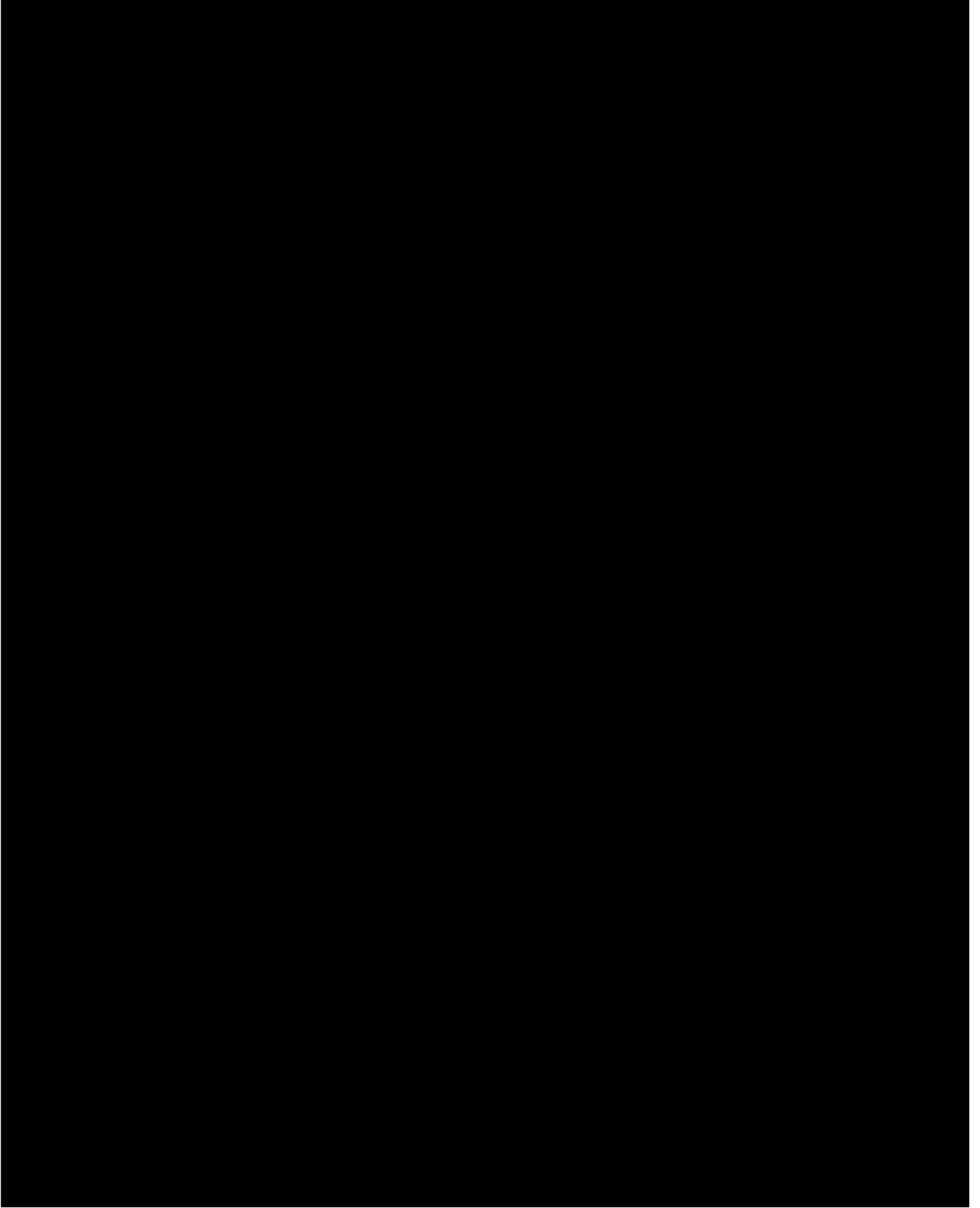
Response

REDACTED

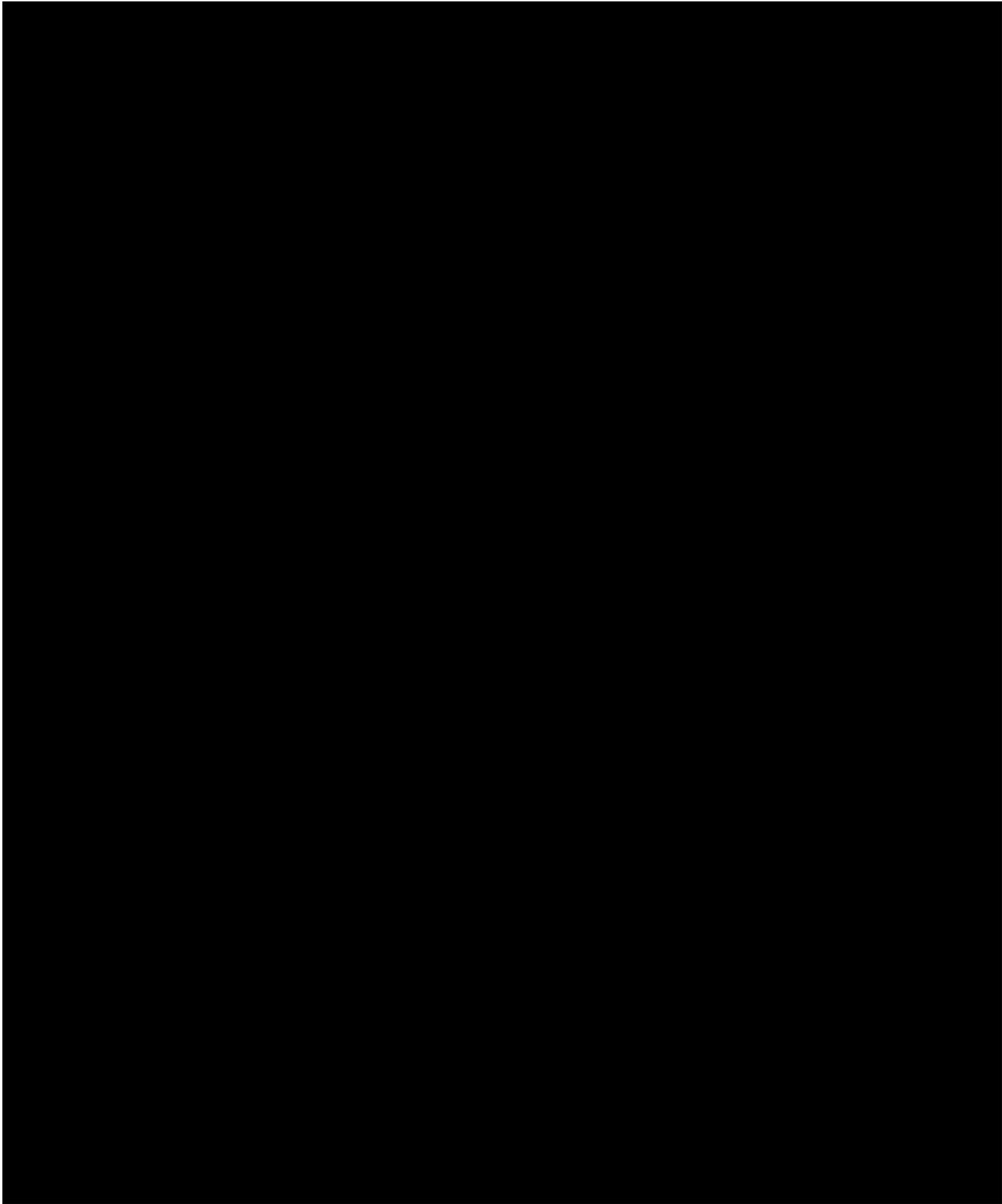
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Please see DEF's response to OPC's Request to Produce, question 22.

REDACTED



REDACTED



20210001-DEF-000308

REDACTED

20210001-DEF-000309

REDACTED

20210001-DEF-000310

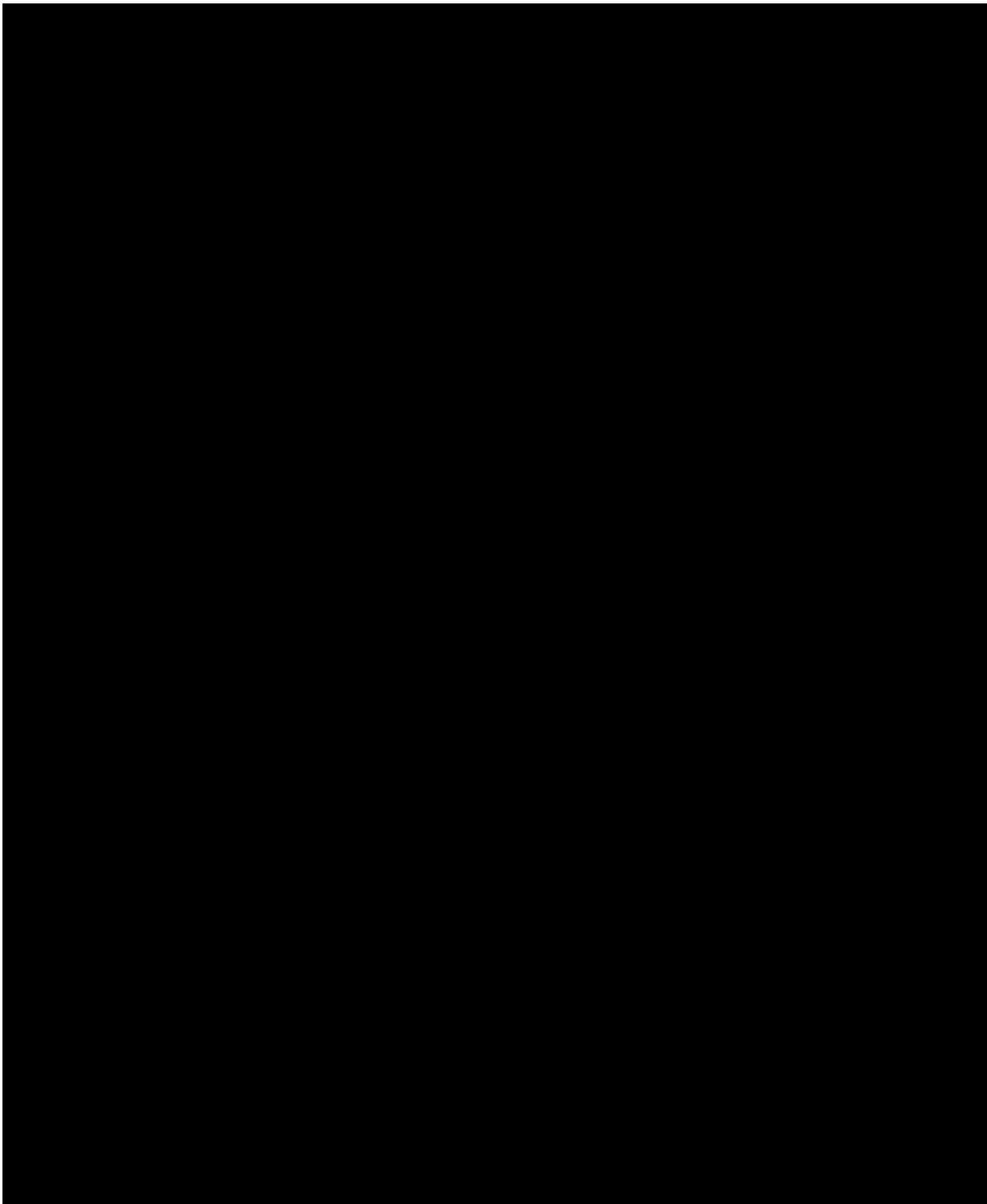
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20210001-DEF-000311

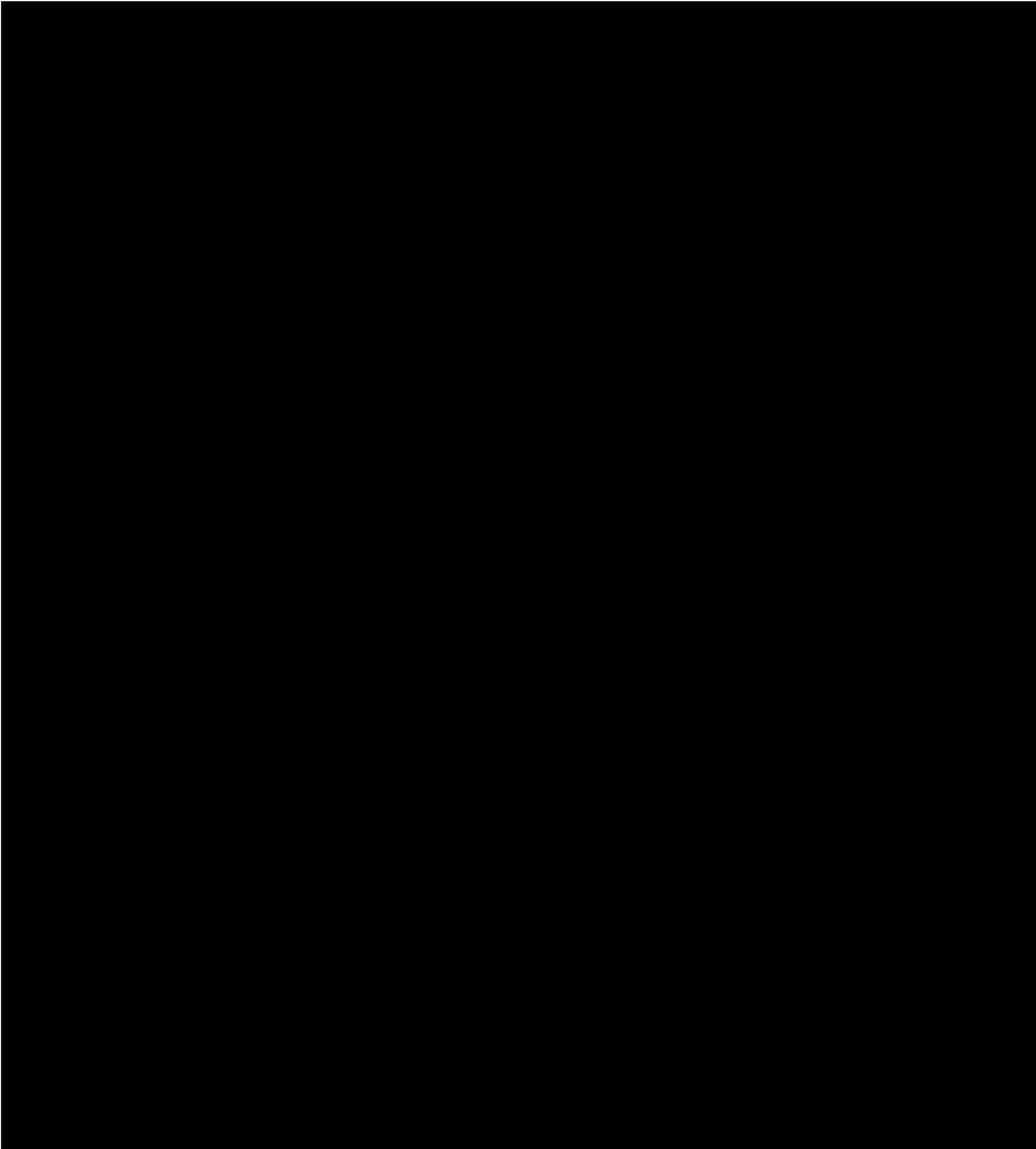
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20210001-DEF-000312

REDACTED

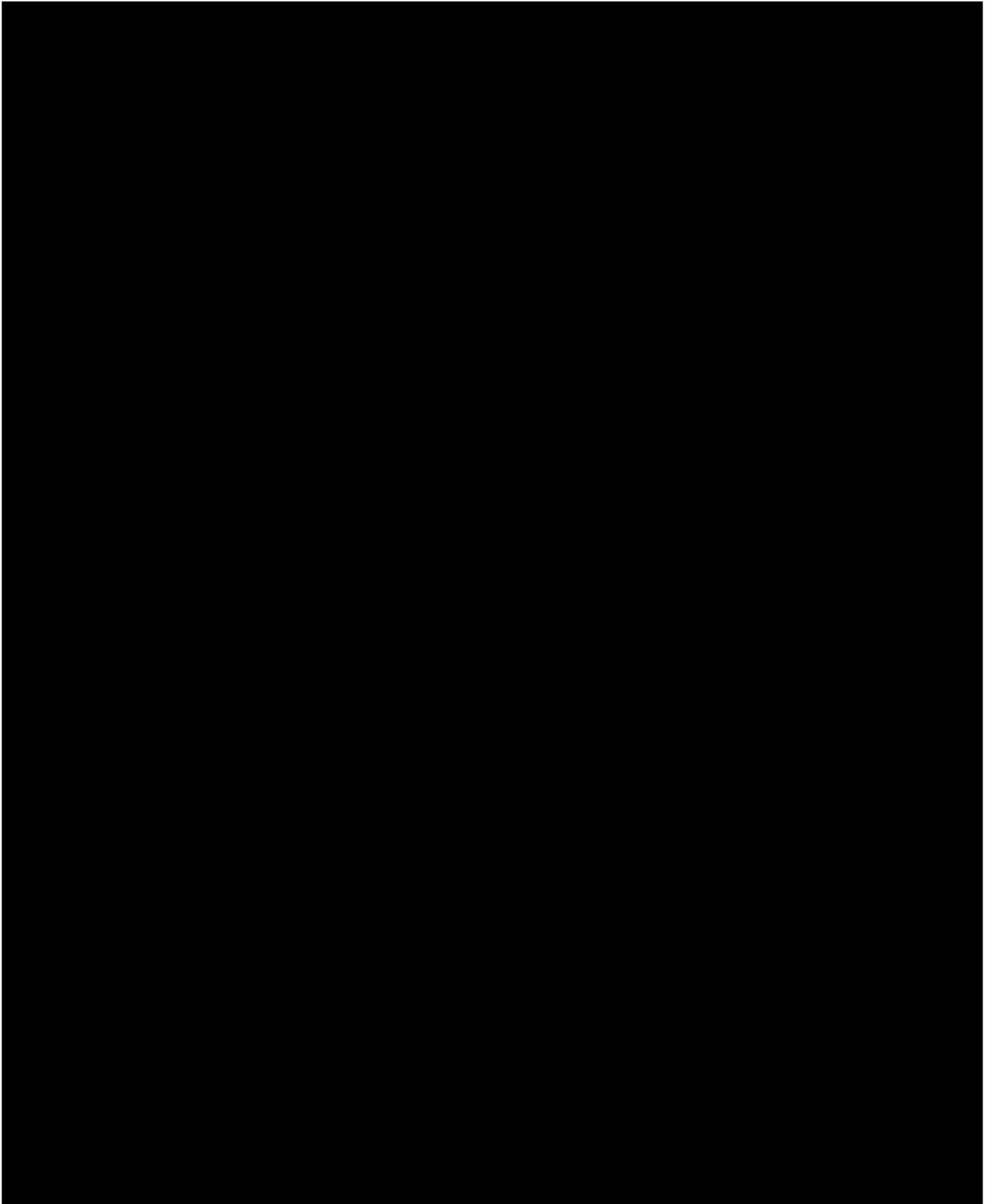


REDACTED



20210001-DEF-000314

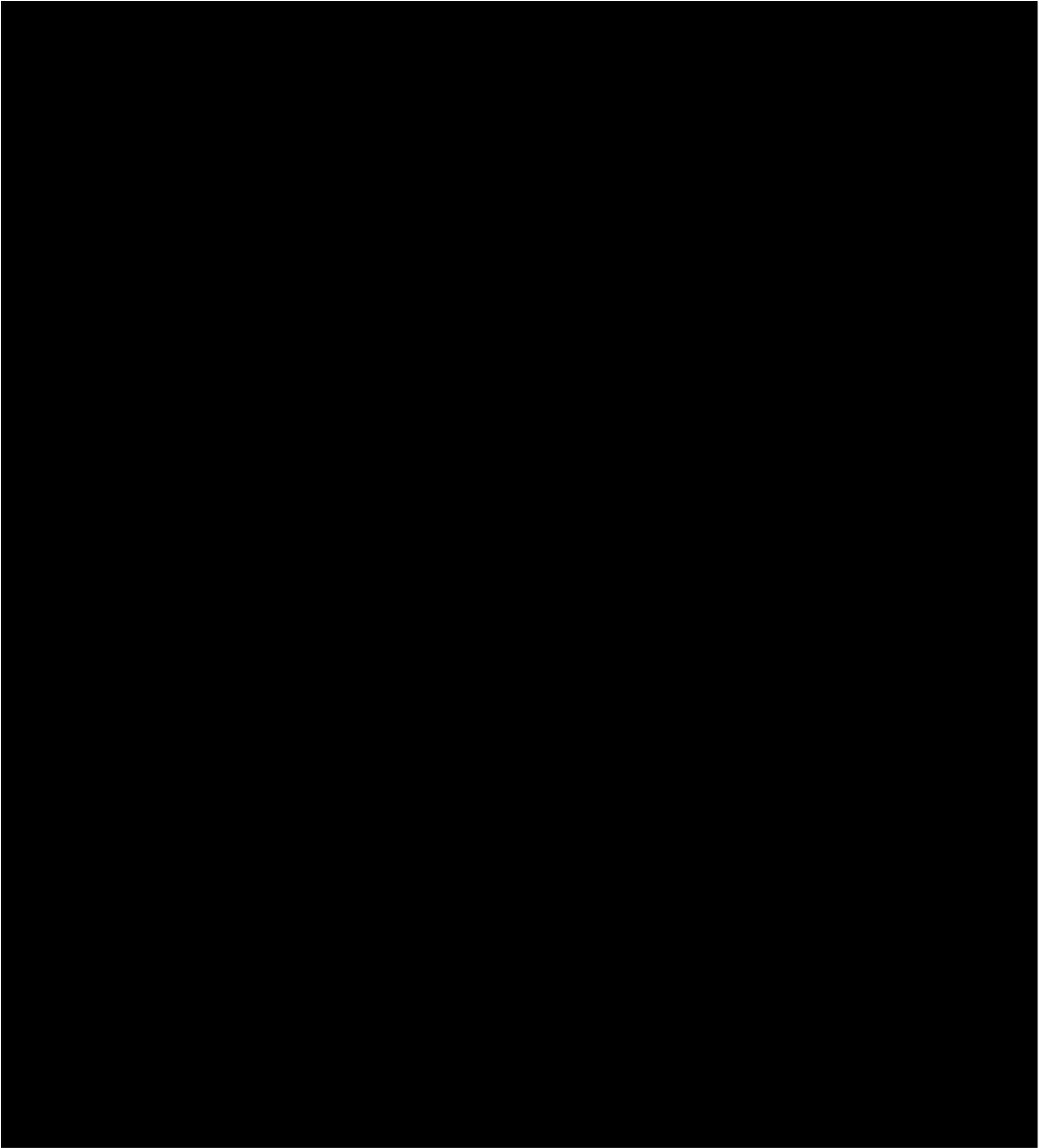
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REDACTED

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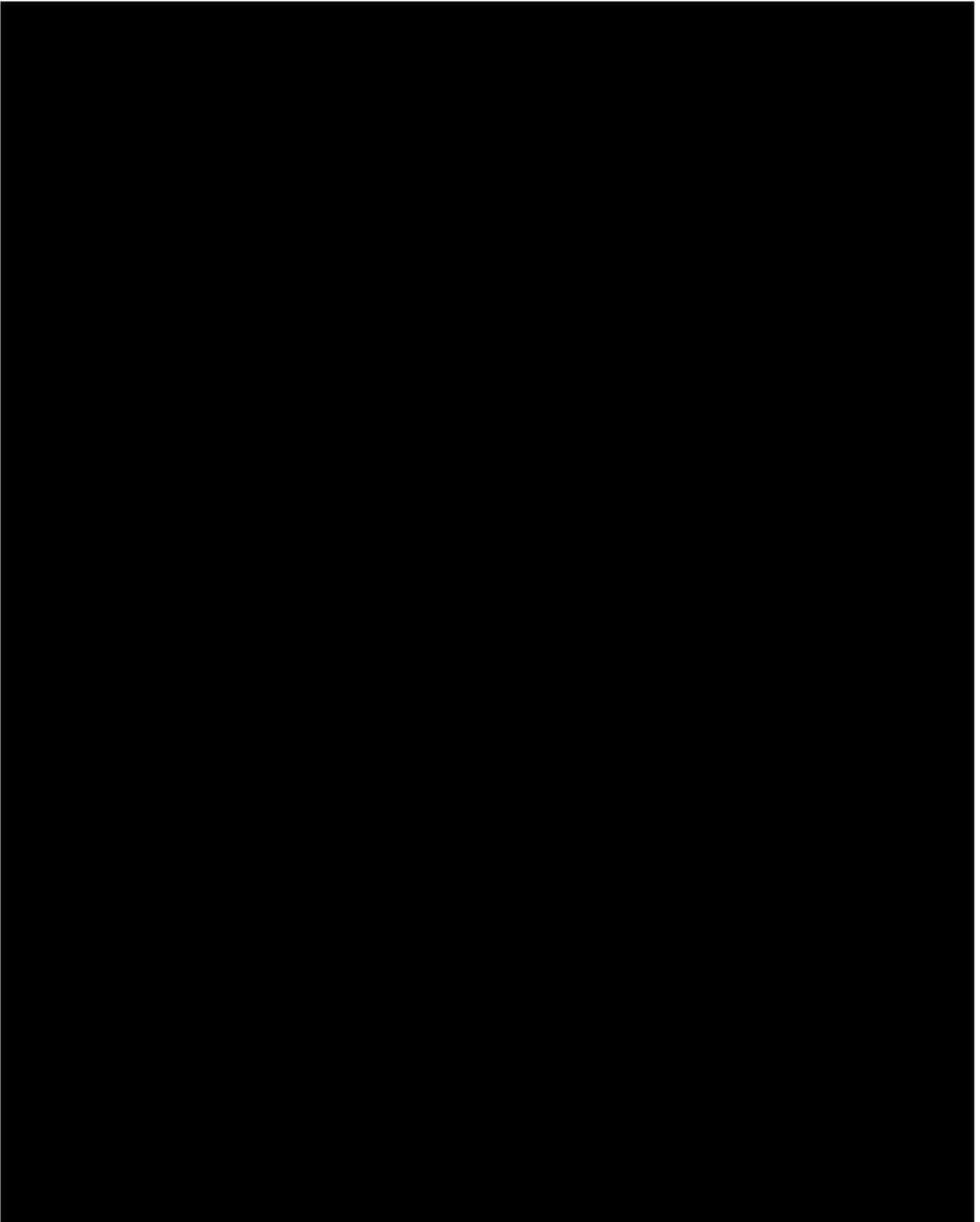
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REDACTED

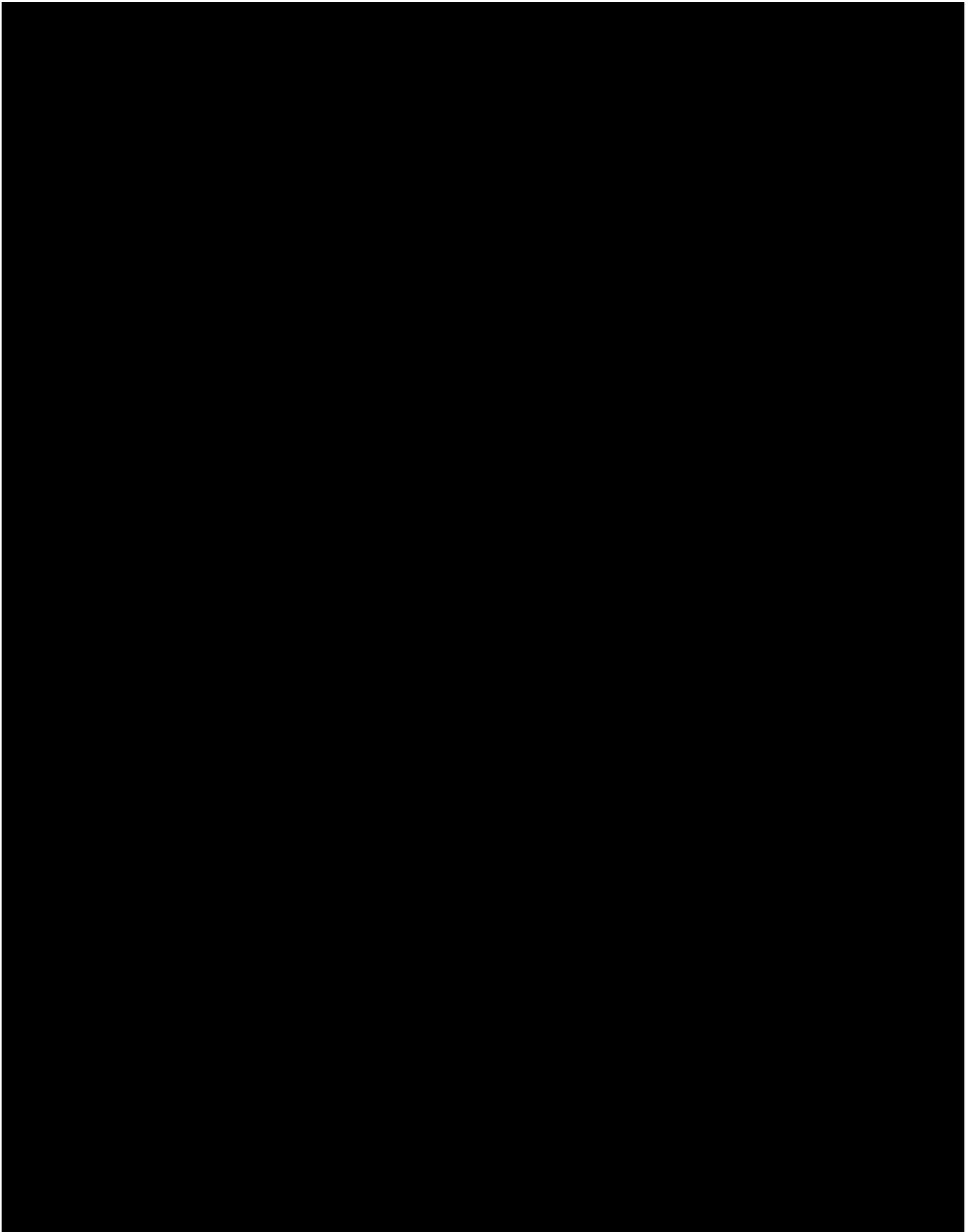
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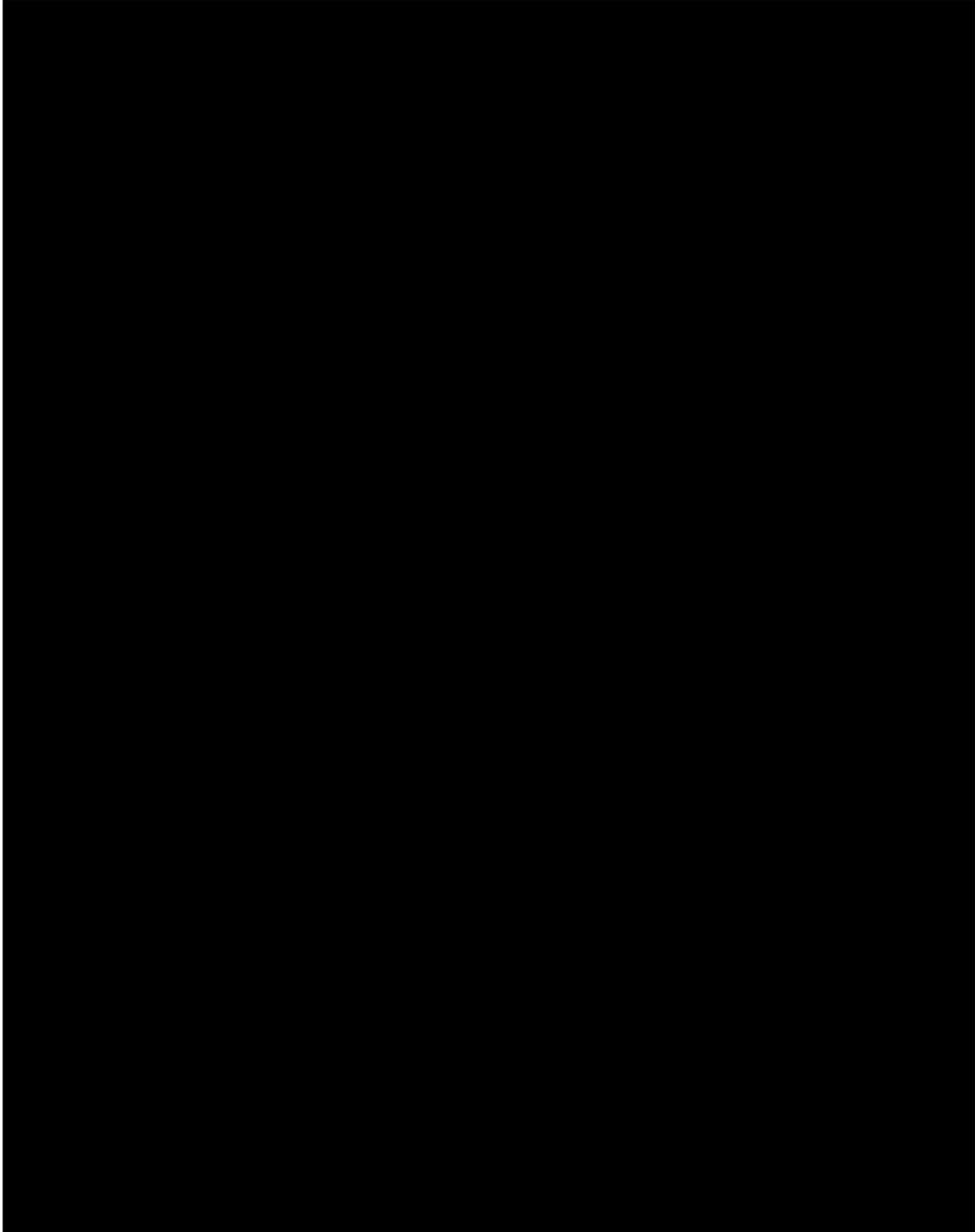
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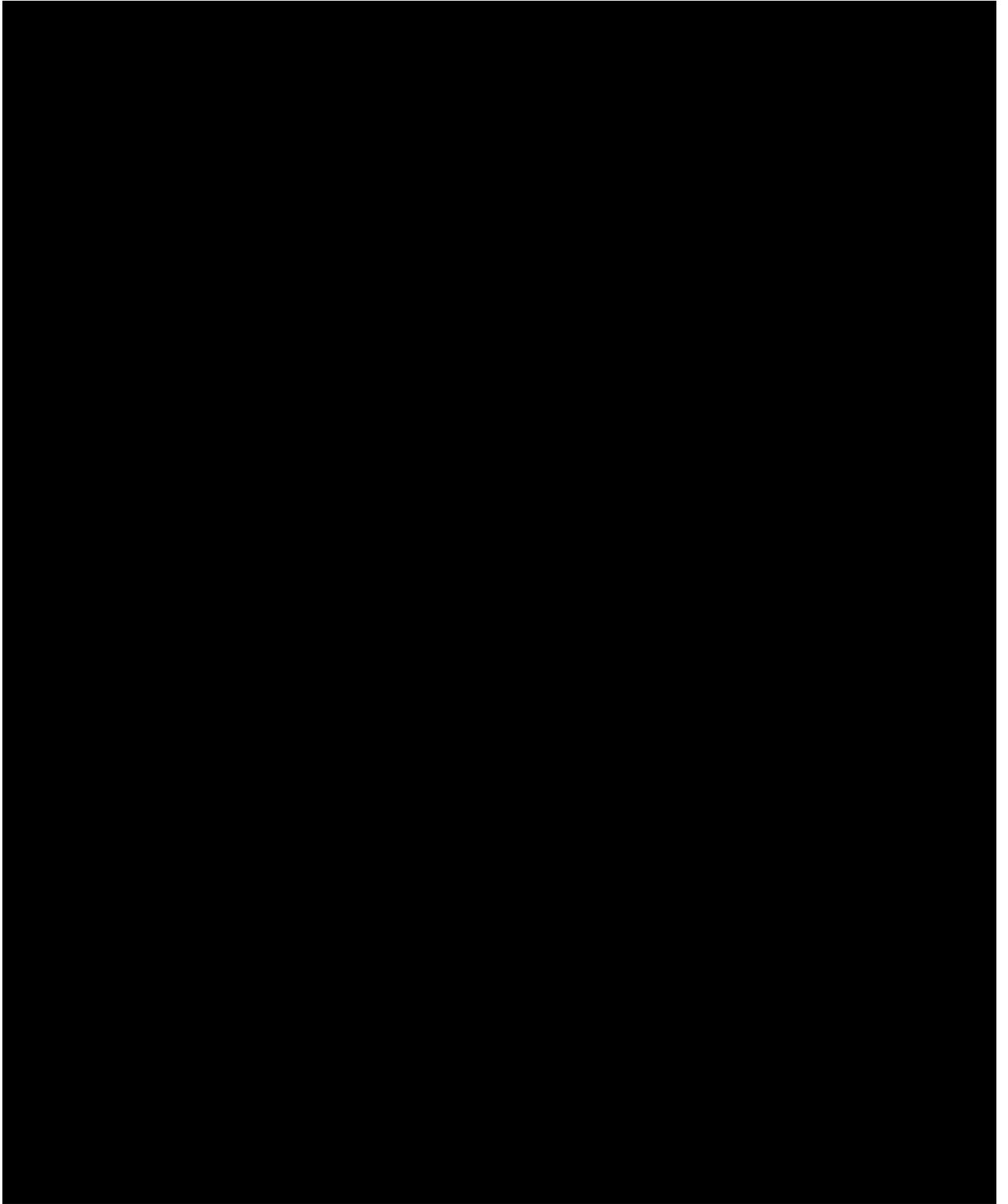


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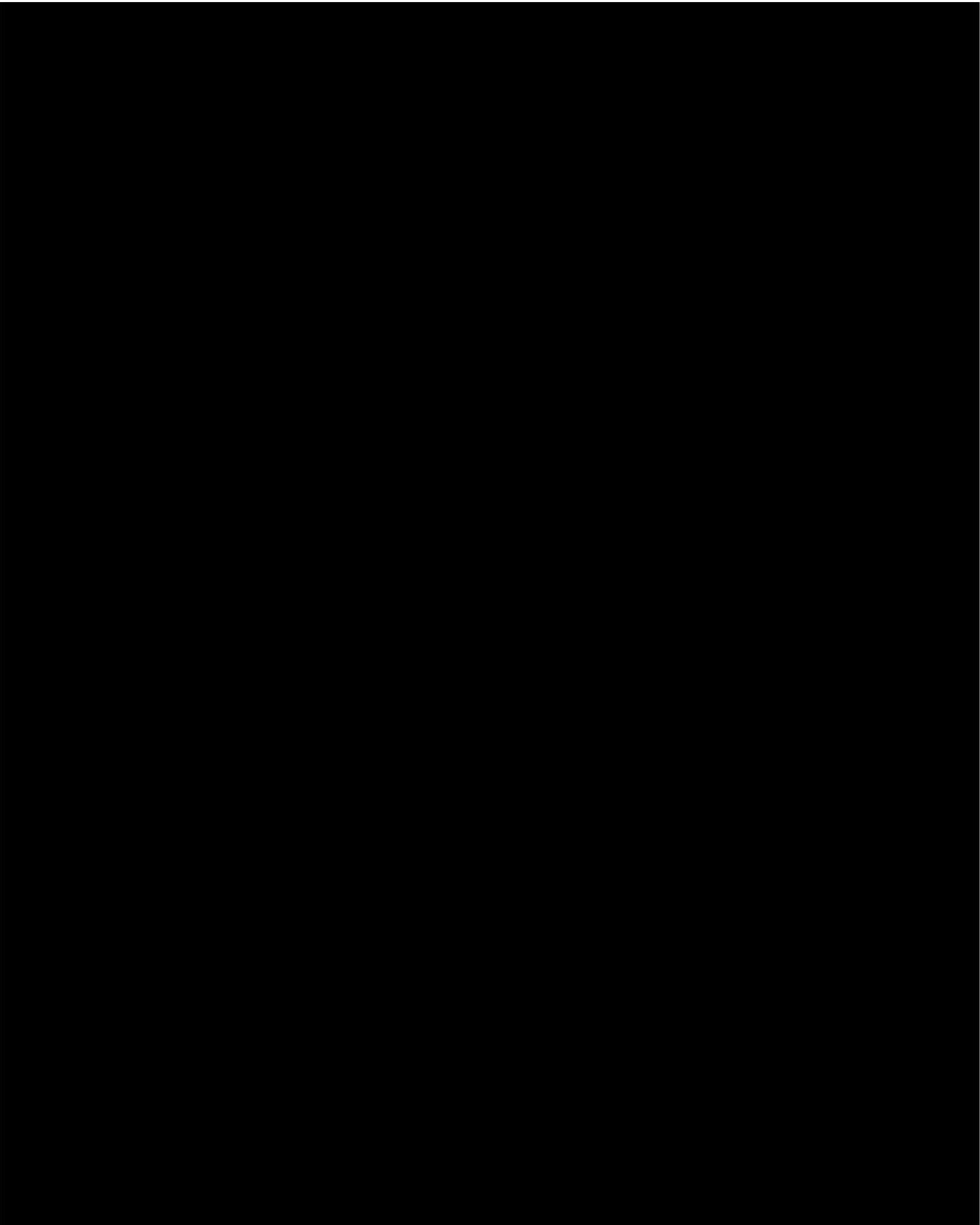


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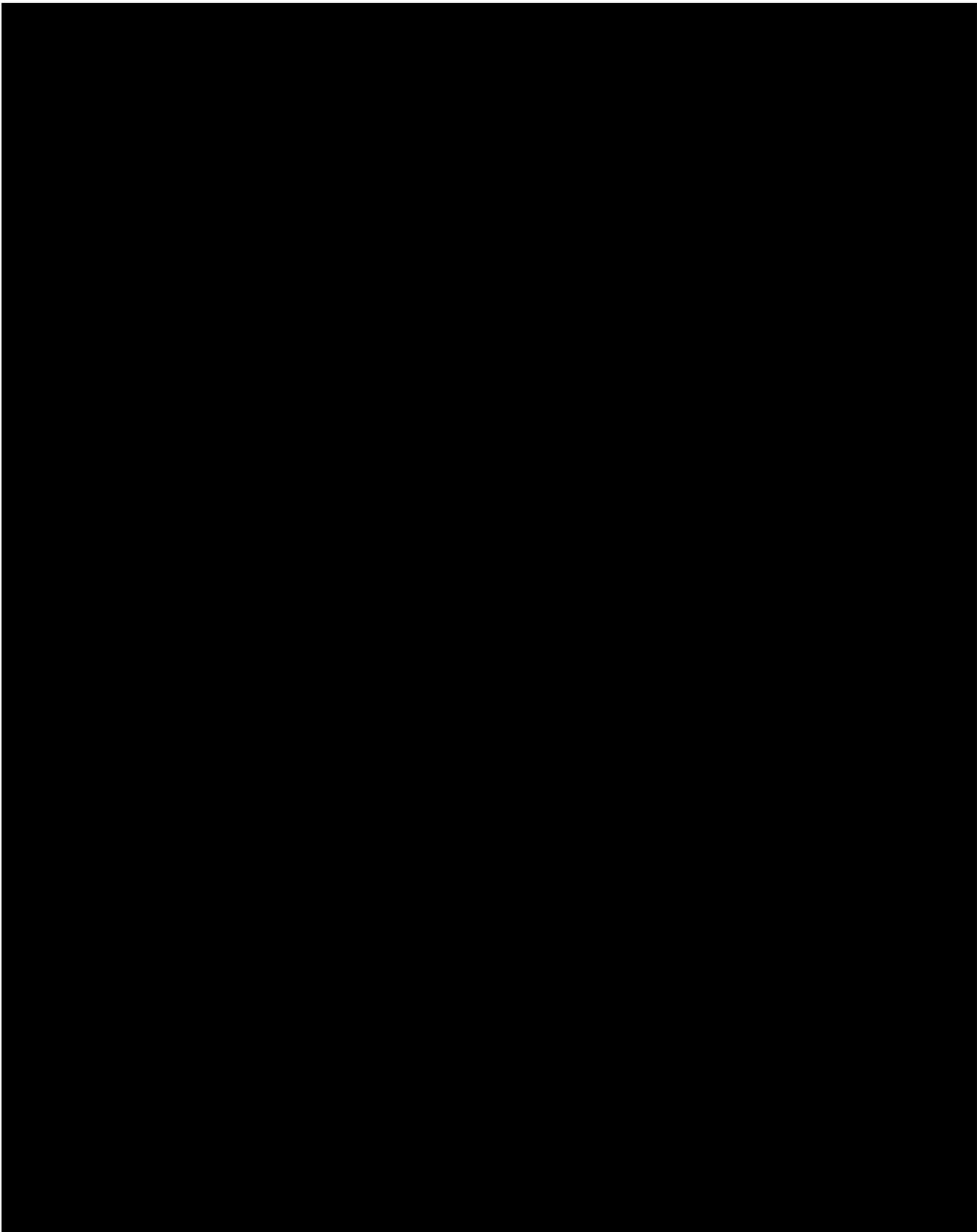


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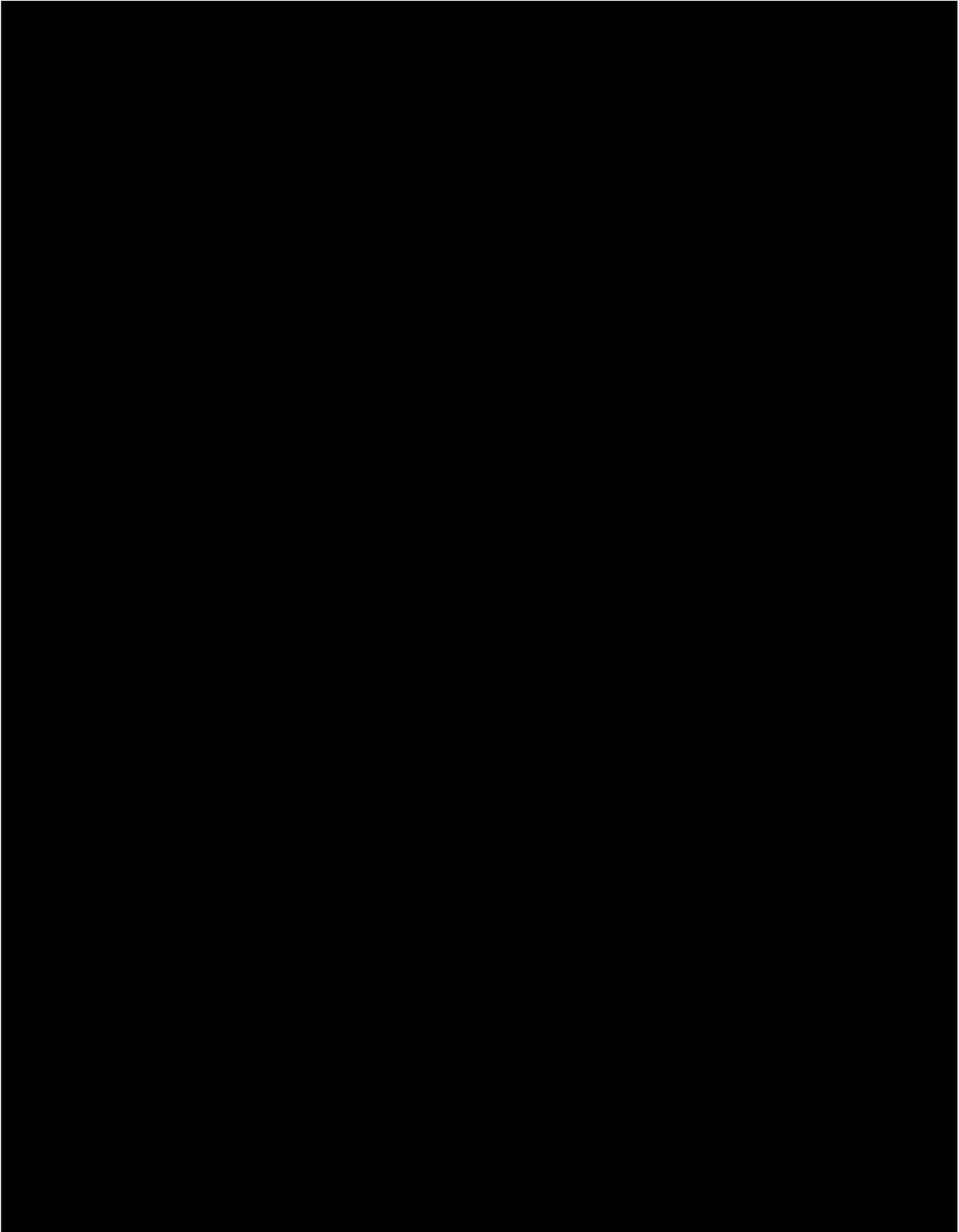
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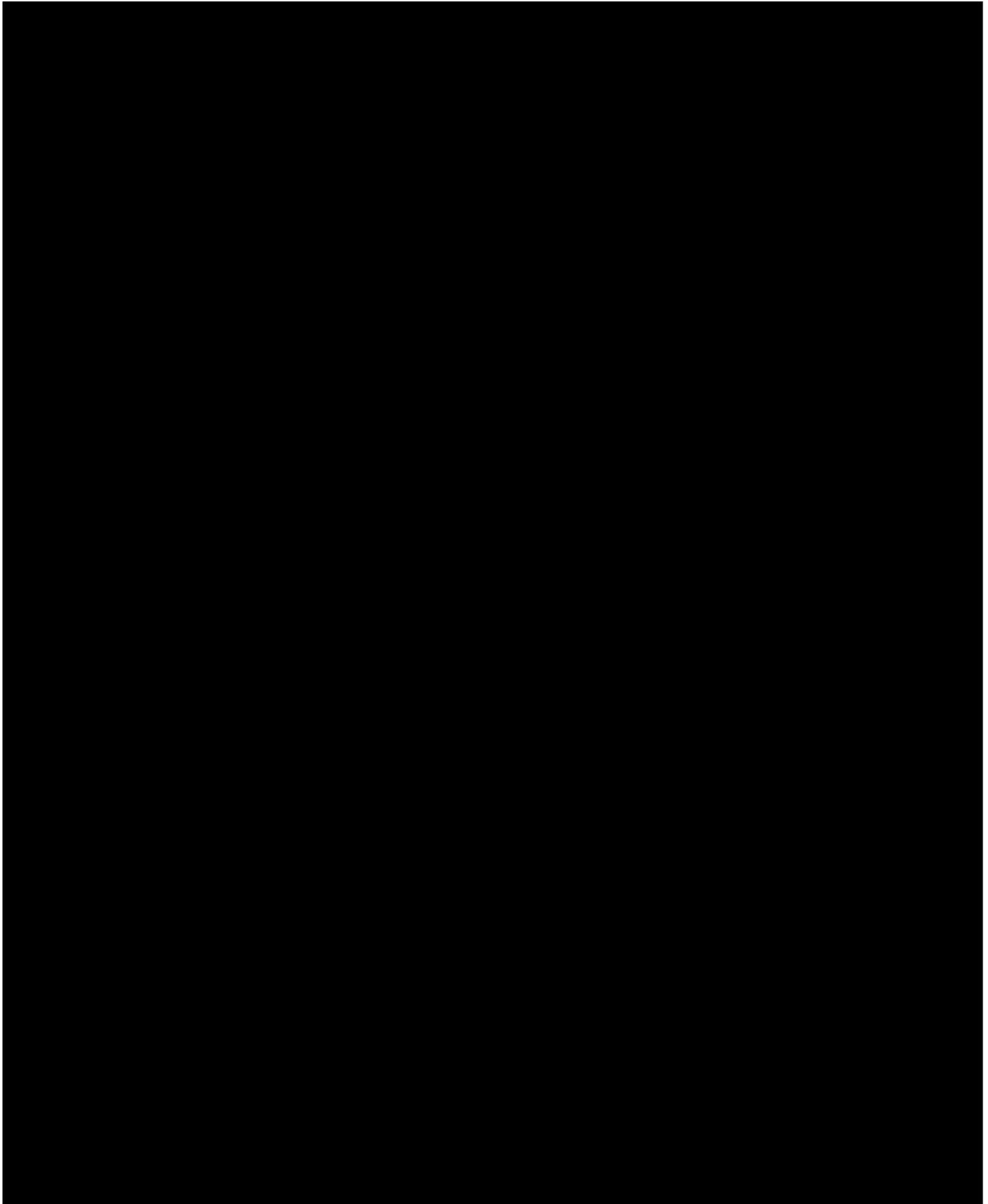


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20210001-DEF-000326

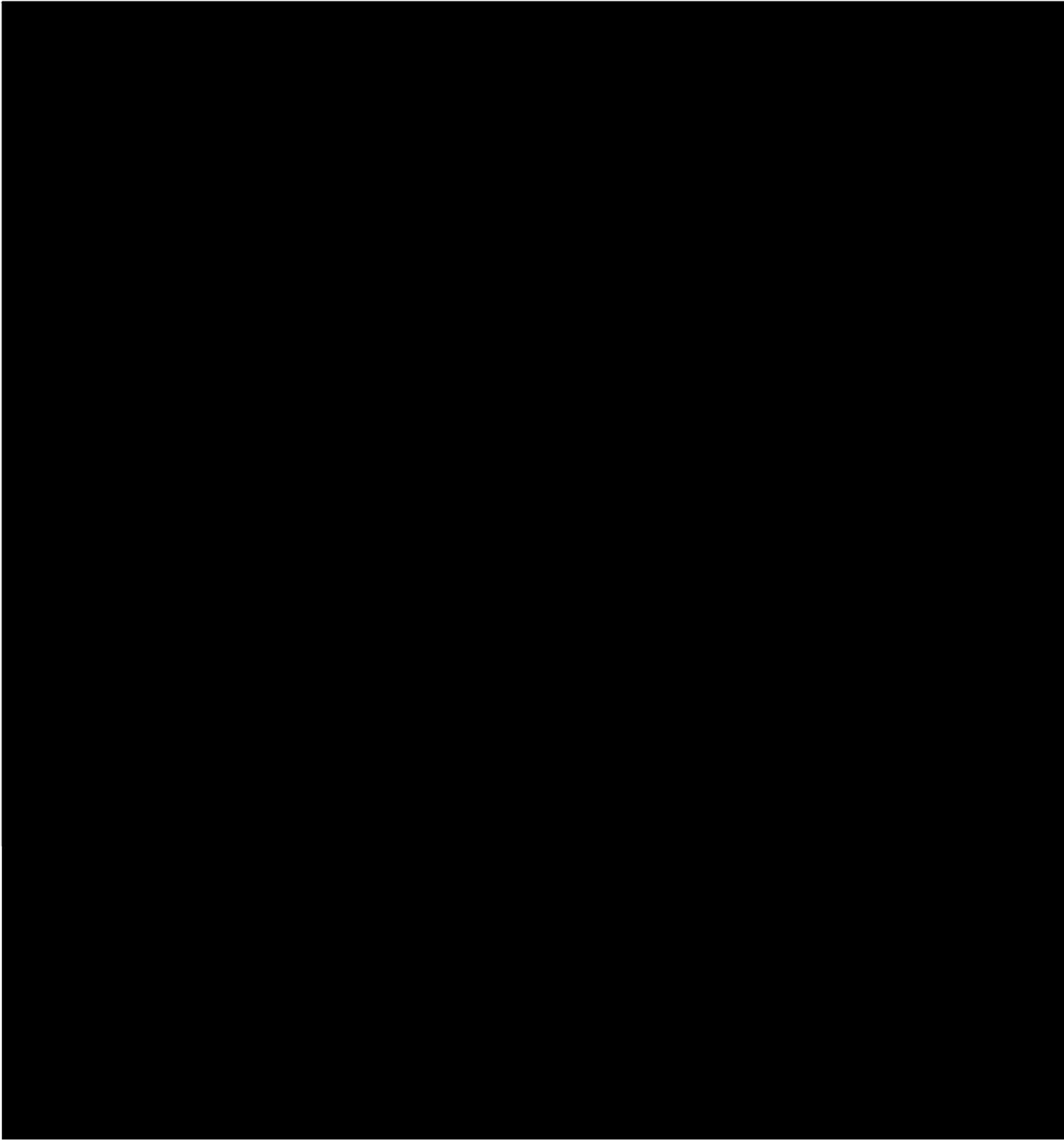
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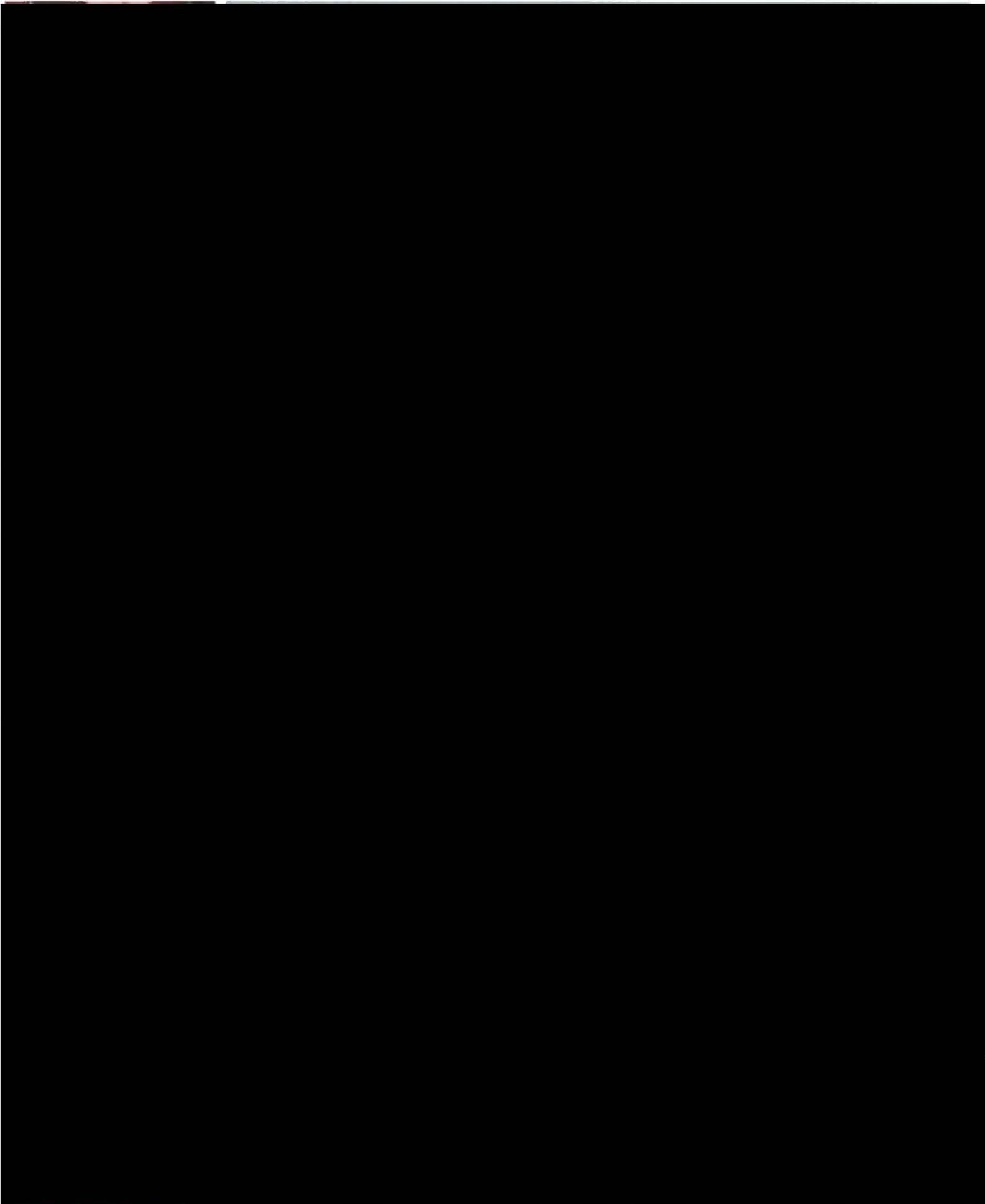
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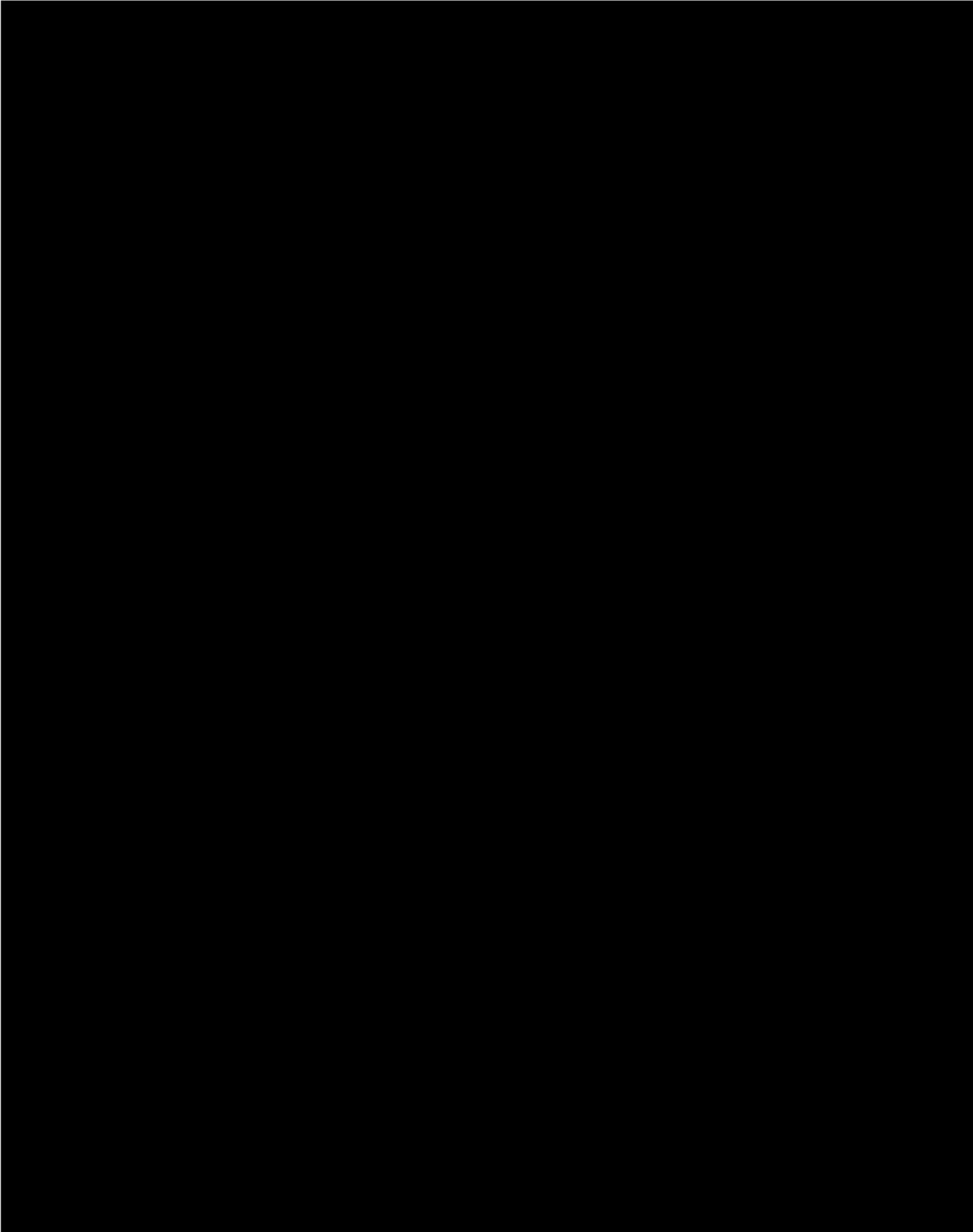




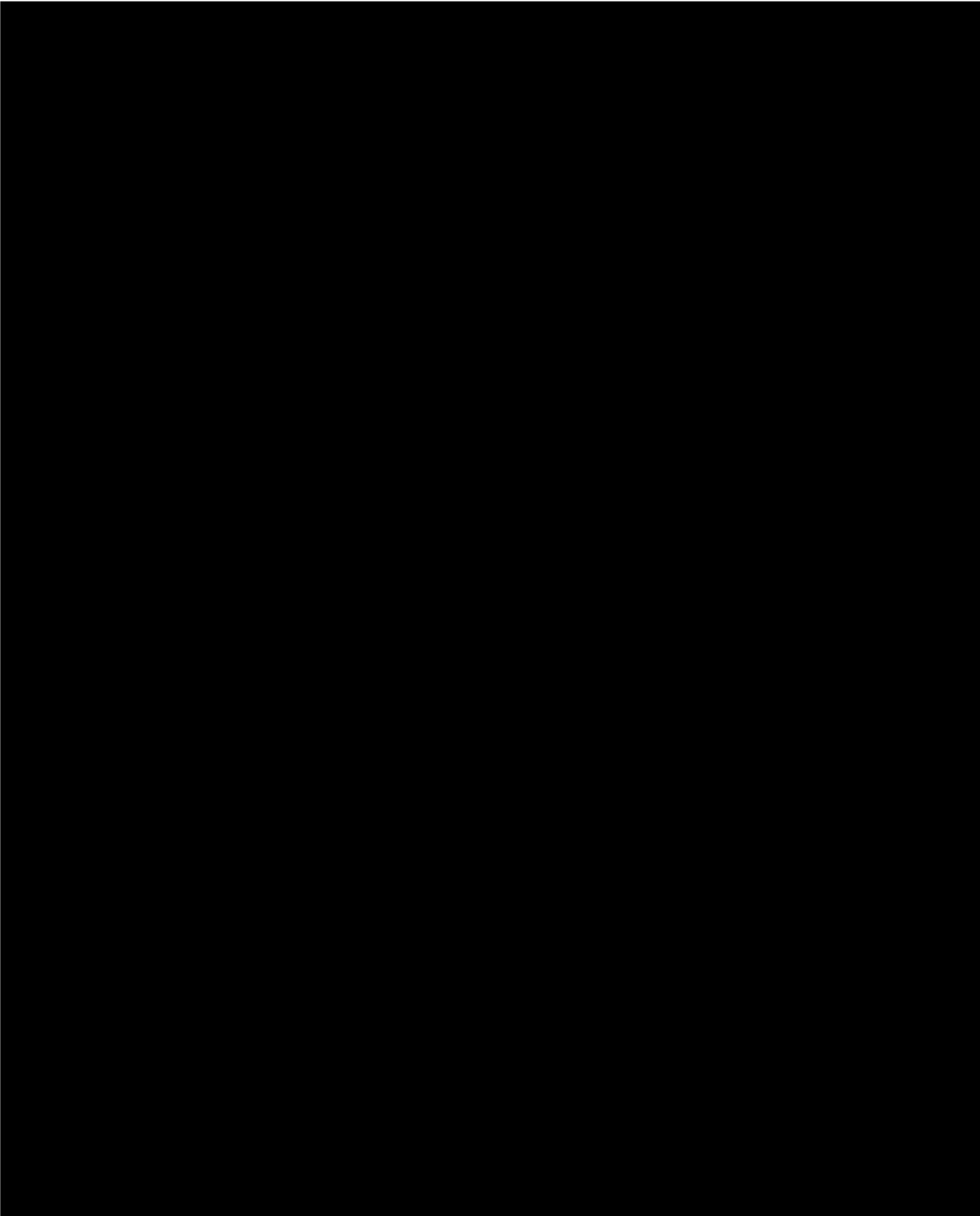
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20210001-DEF-000237

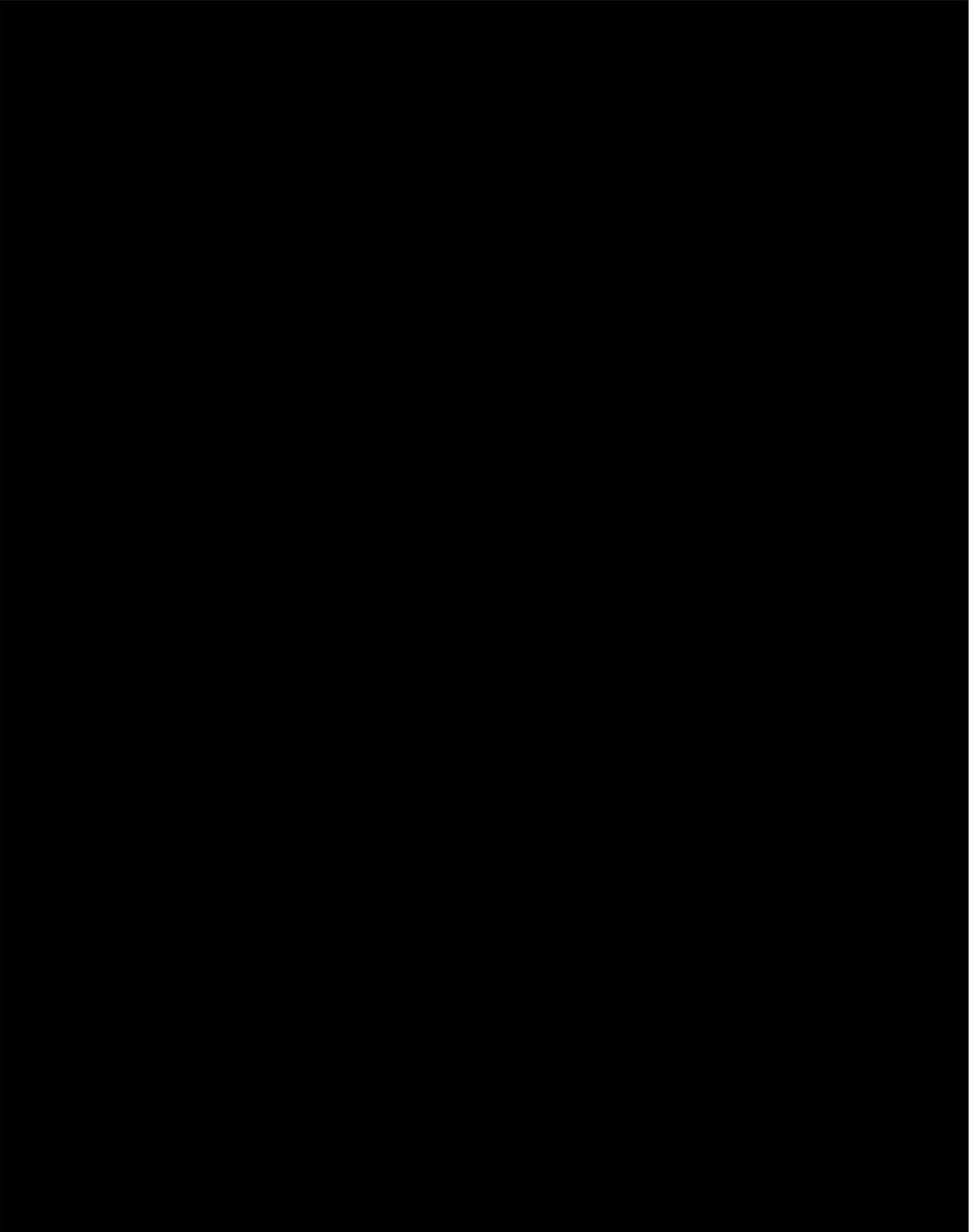
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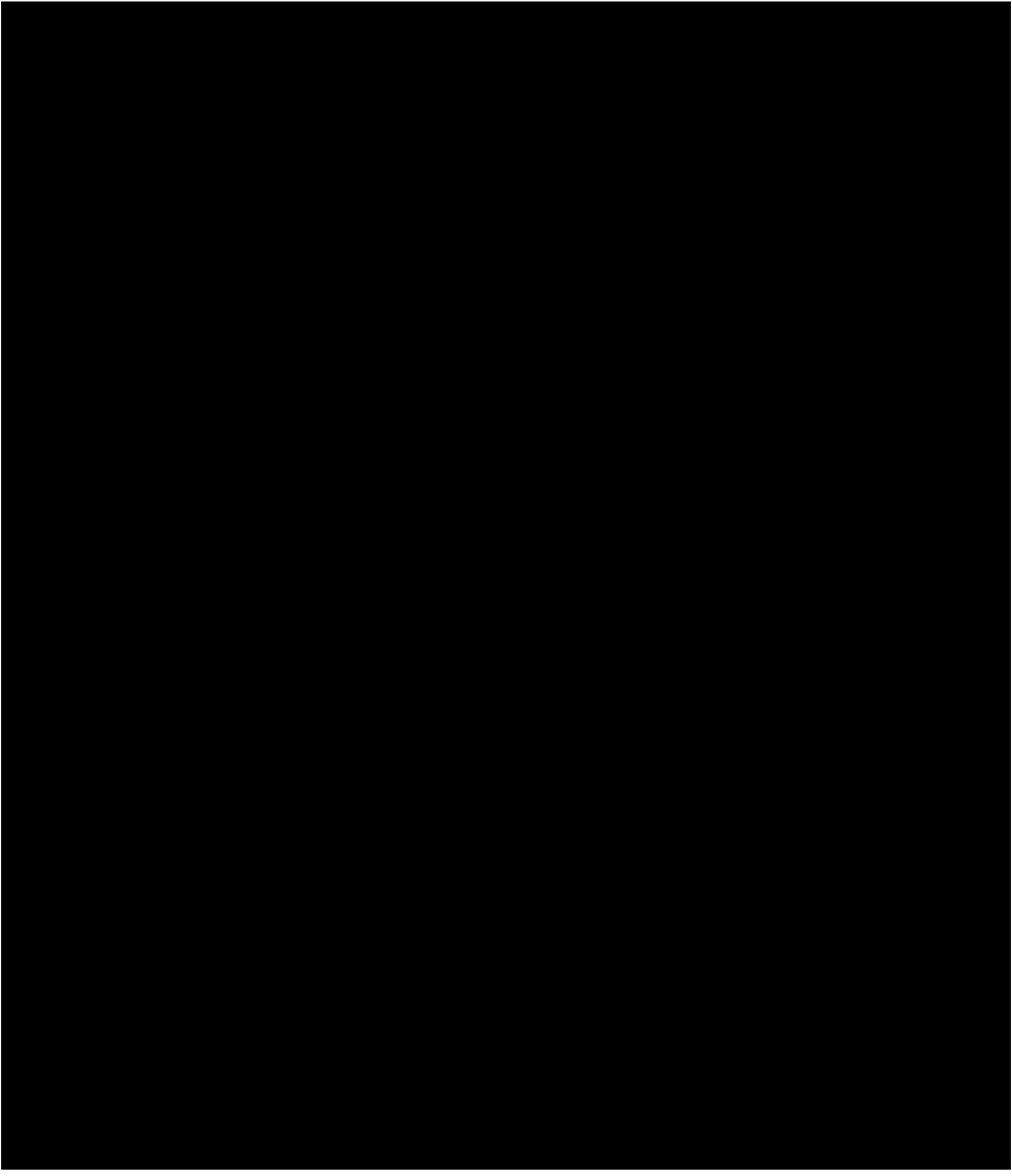


REDACTED



REDACTED

20210001-DEF-000241



PROPERTY INSURANCE POLICY

POLICY OF ALL RISK PROPERTY INSURANCE INCLUDING MACHINERY BREAKDOWN
EFFECTED WITH ASSOCIATED ELECTRIC AND GAS INSURANCE SERVICES LIMITED
HAMILTON, BERMUDA

PLEASE READ THE ENTIRE POLICY CAREFULLY.



DECLARATIONS

POPLICY NUMBER: PO5273408P

DECLARATIONS NUMBER: 1

Original Named Insured: DUKE ENERGY CORPORATION, and any subsidiary thereof including Duke Energy Carolinas, LLC; Duke Energy Progress, LLC; Duke Energy Florida, LLC. and their financially controlled or actively managed organizations including partnerships, limited liability companies (LLC's), limited partnerships (LP's), joint ventures, and any other entities, persons, organizations or properties in their entirety which any of the above have agreed to insure as now exist or may hereafter be constituted or acquired.

Named Reinsured: Bison Insurance Company Limited, 146 Fairchild Street, Suite 135, Charleston, SC 29492; Mailing Address: 550 South Tryon Street, DEC-40C, Charlotte, NC 28202

1. TERM OF INSURANCE

Primary: [REDACTED]

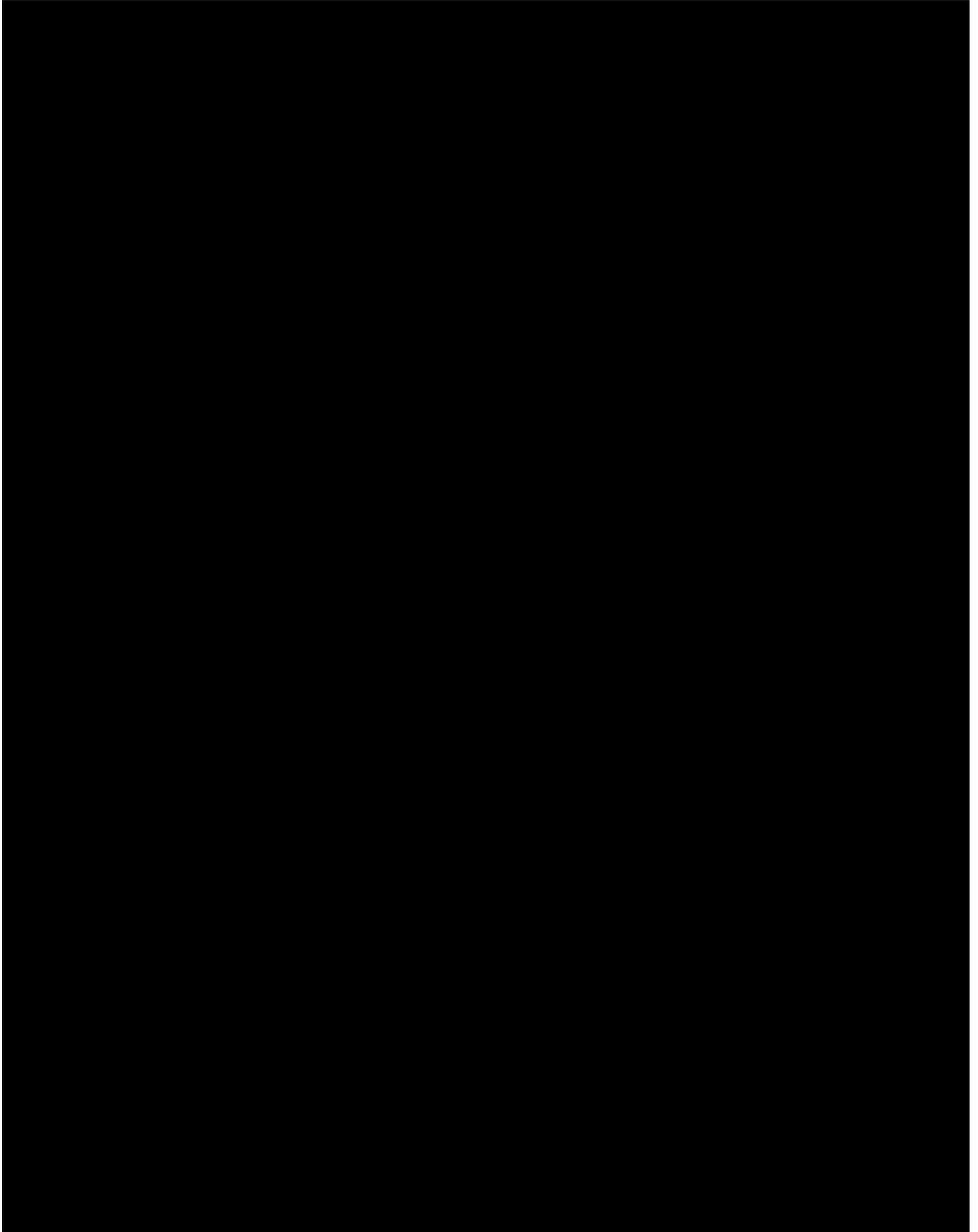
In consideration of [REDACTED] (100%) this policy attaches and covers from **May 1, 2020** to **May 1, 2021** beginning and ending at 12:01 a.m. standard time, at the location of the property involved.

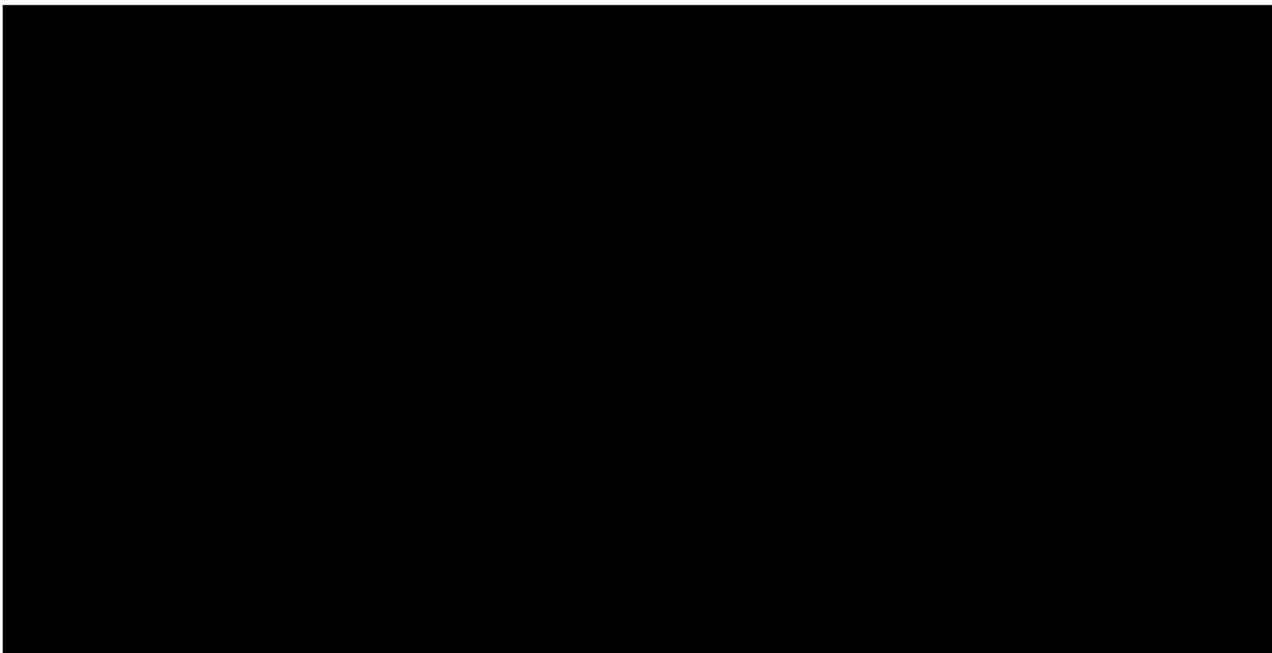
2. PARTICIPATION

This policy covers for a specified percent interest in this insurance, and this Insurer shall not be liable for more than specified percent of the limits of liability set forth herein.

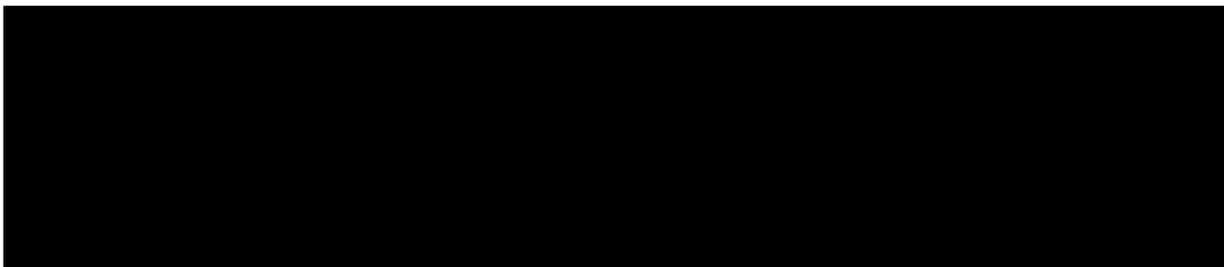
Primary: [REDACTED] part of \$650,000,000 per occurrence

3. **LIMIT OF LIABILITY**

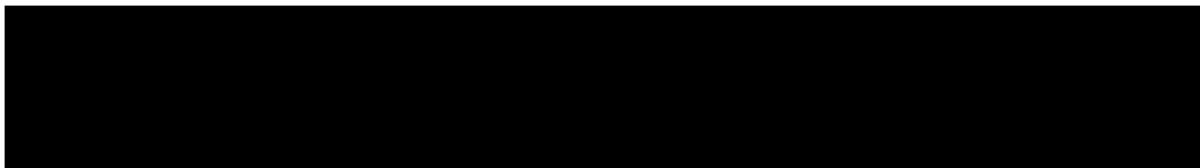




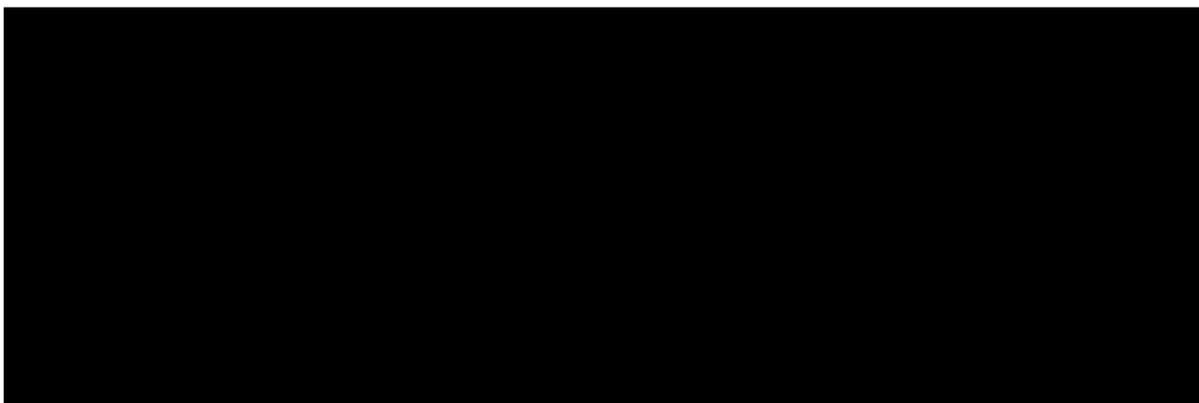
4. **DEDUCTIBLES**

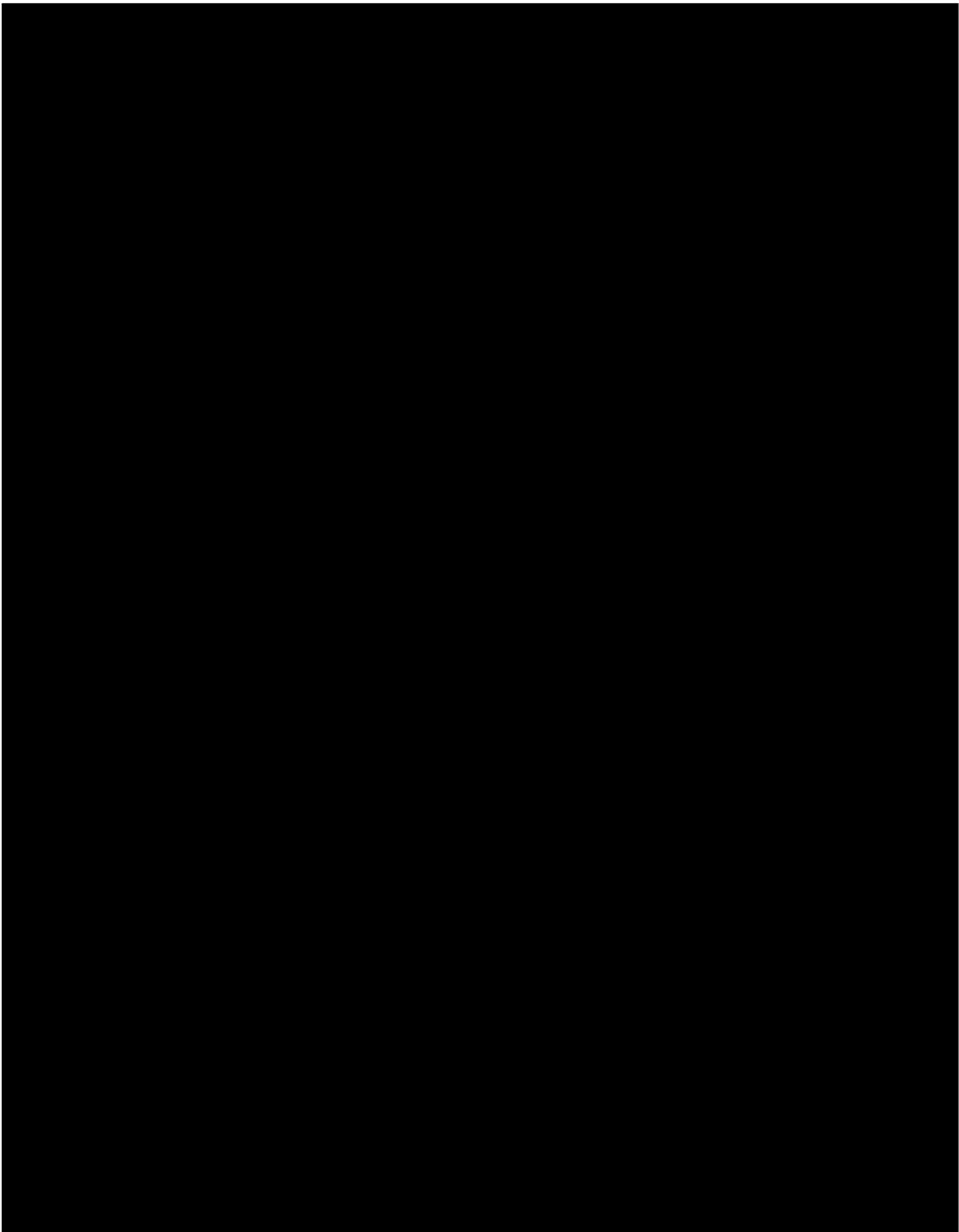


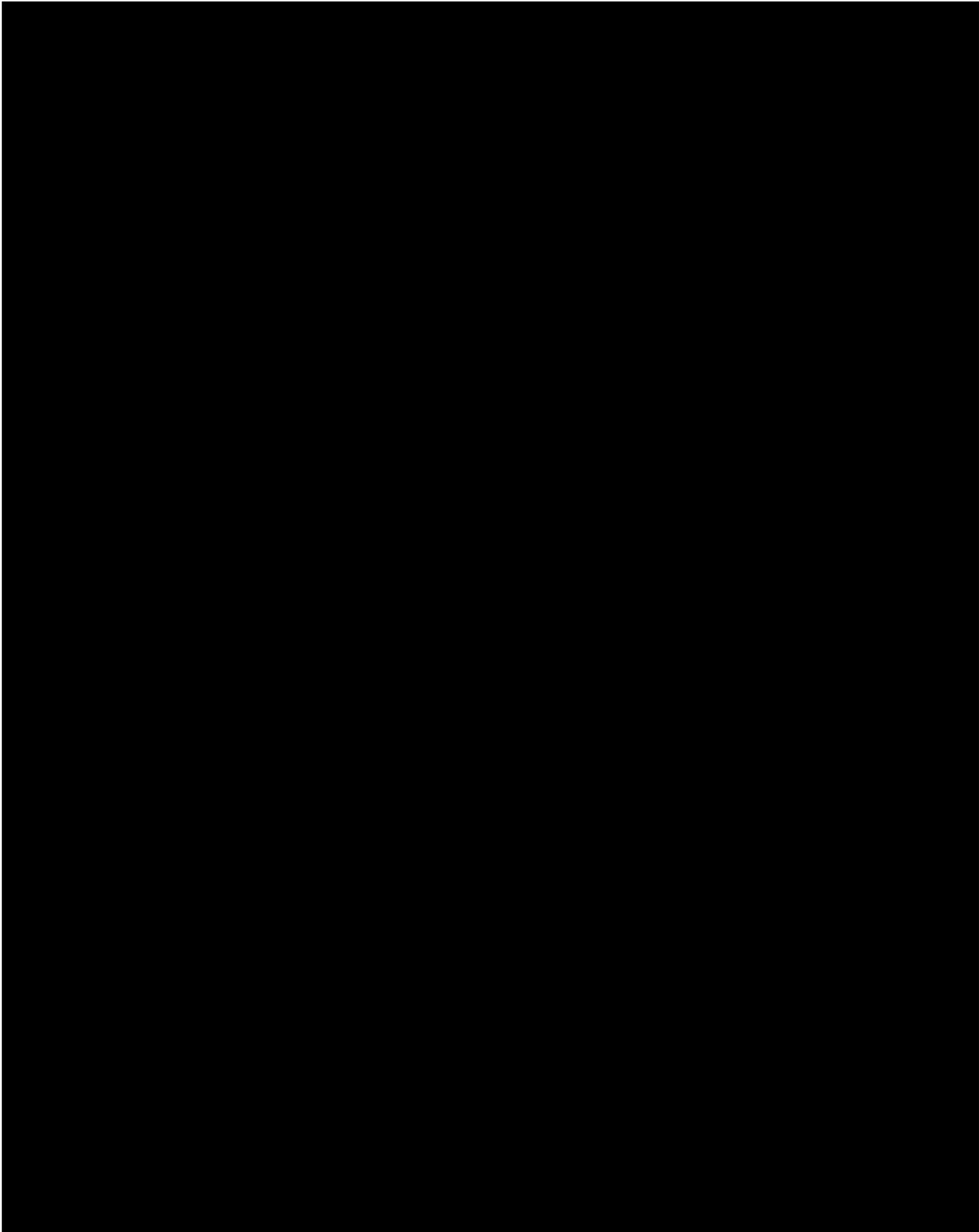
5. **LOSS PAYABLE**

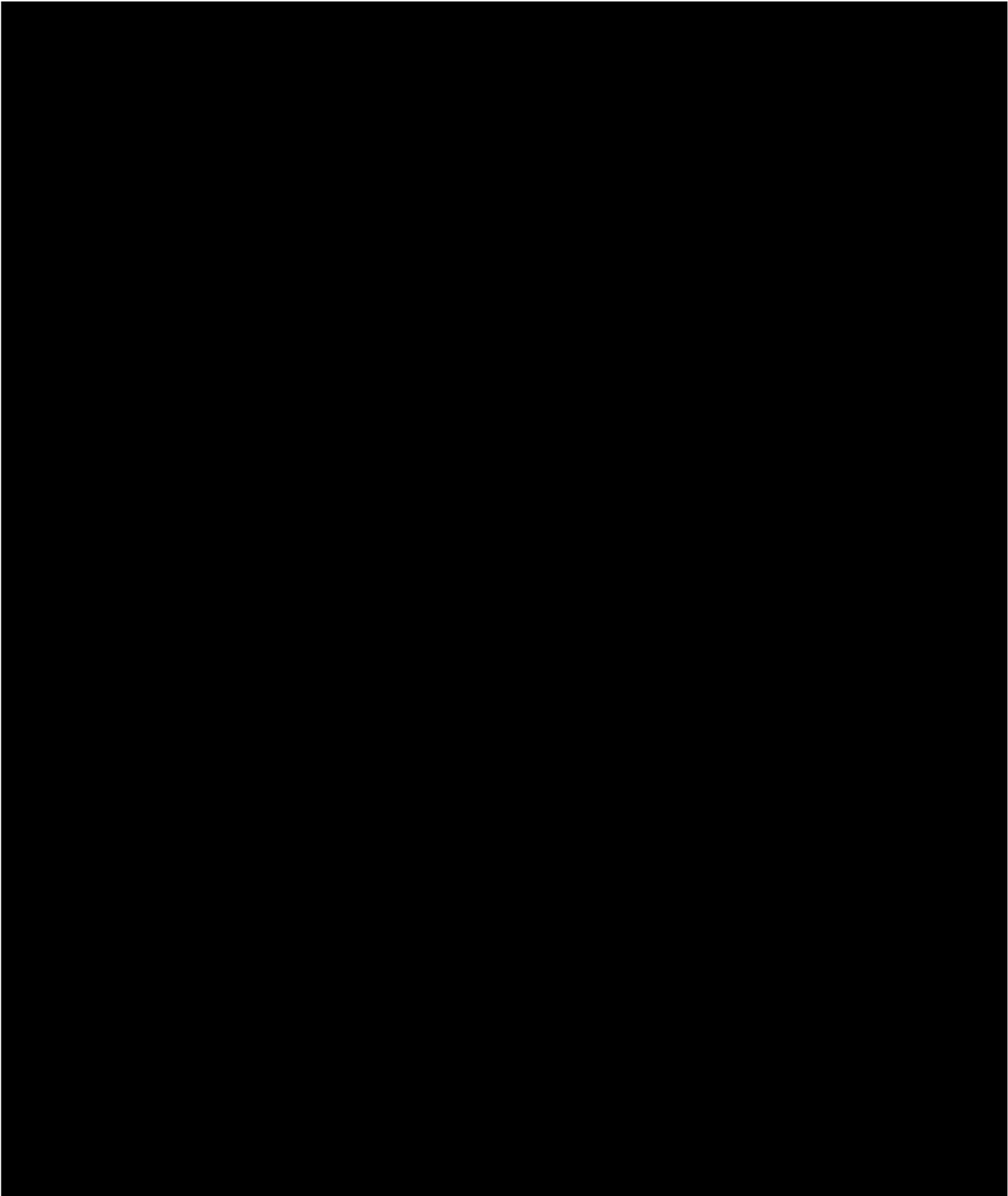


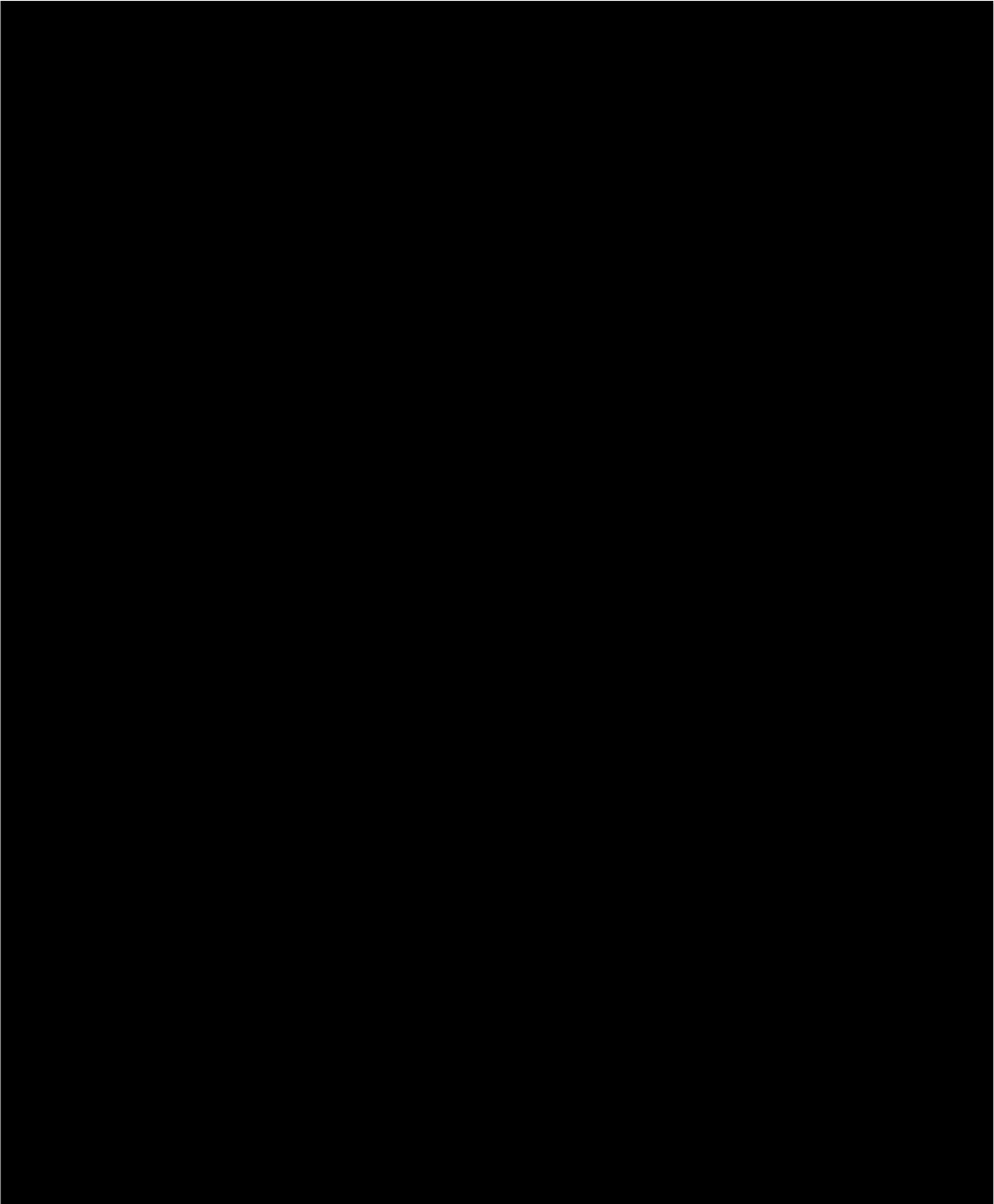
6. **TERRITORY**

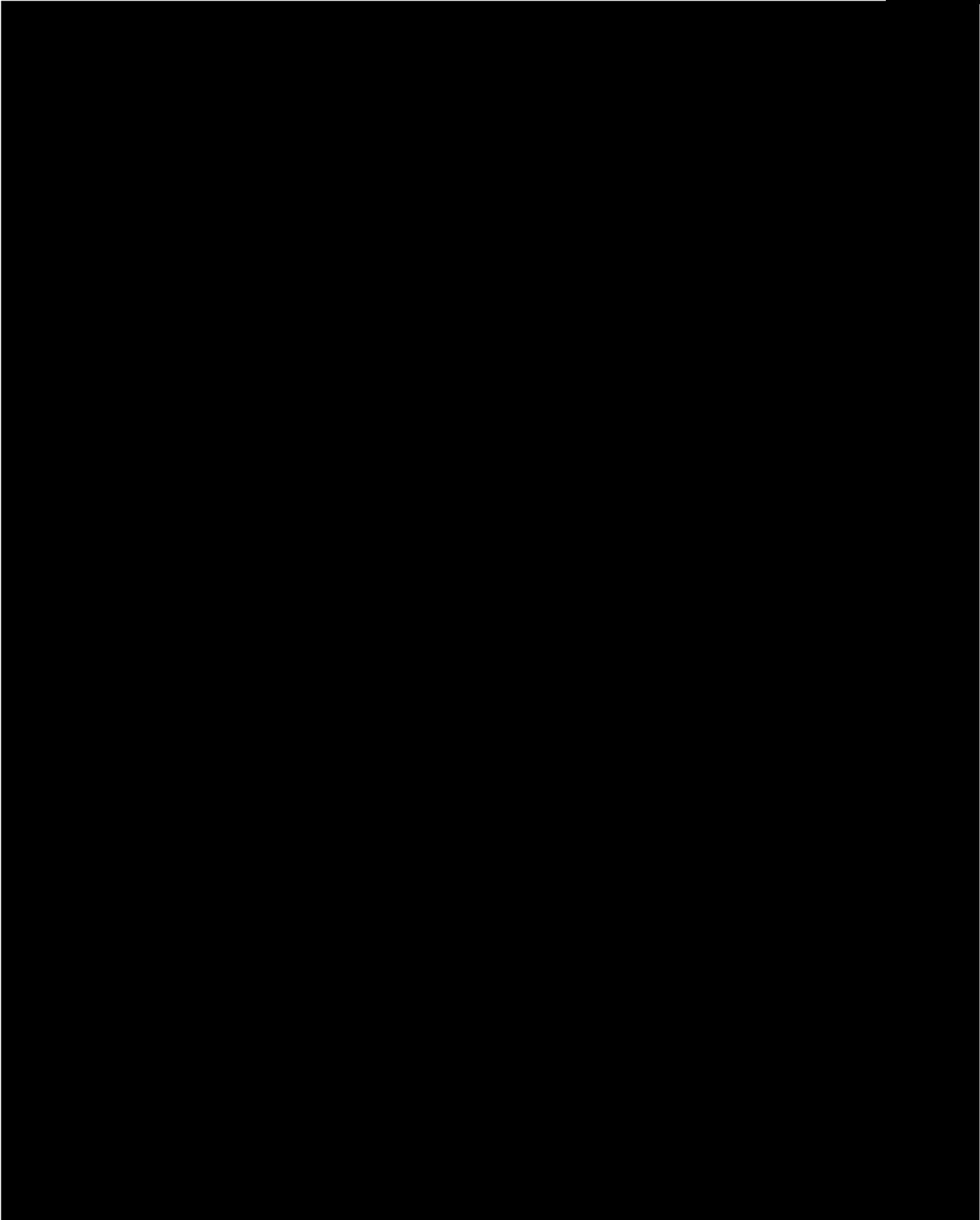


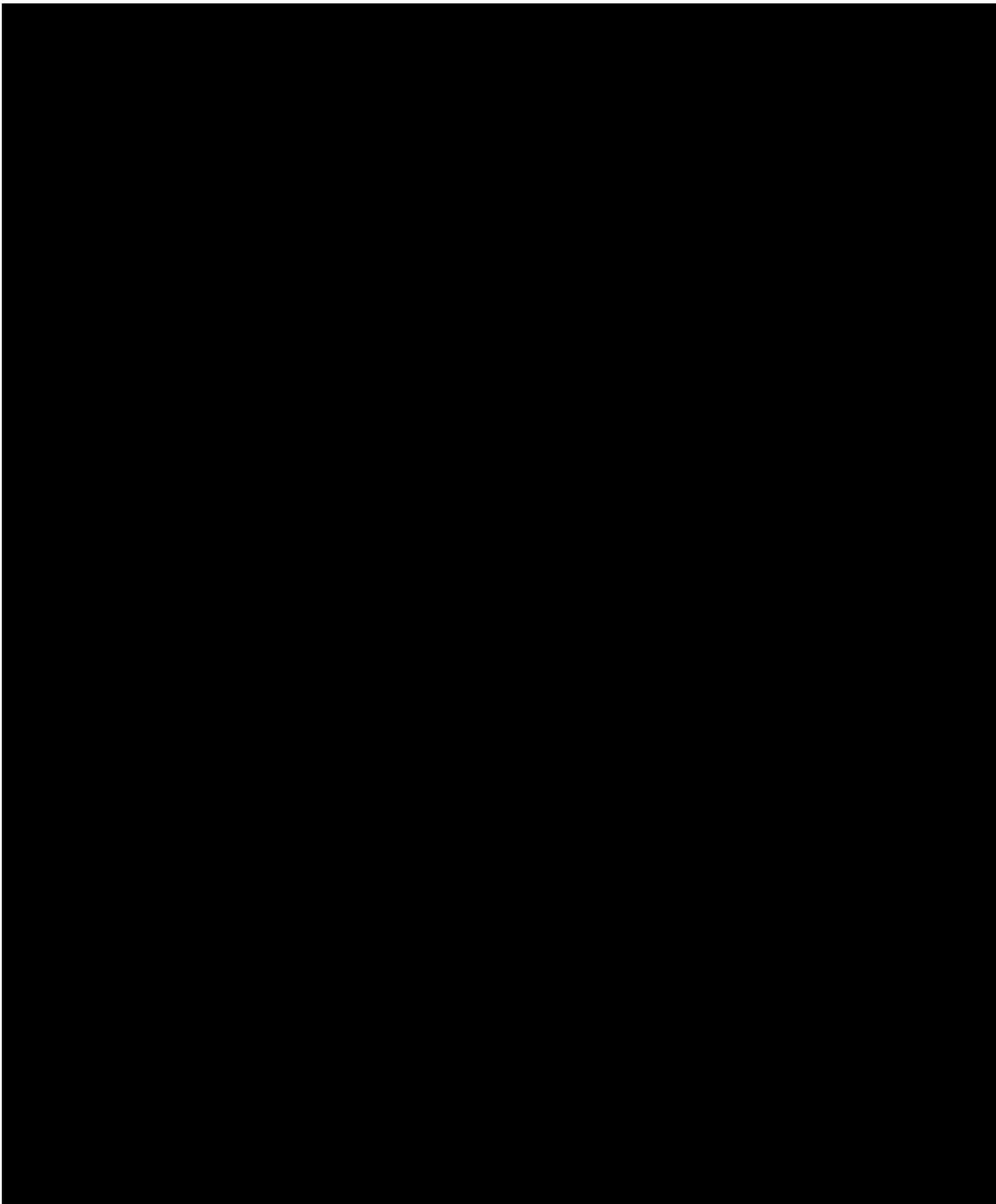


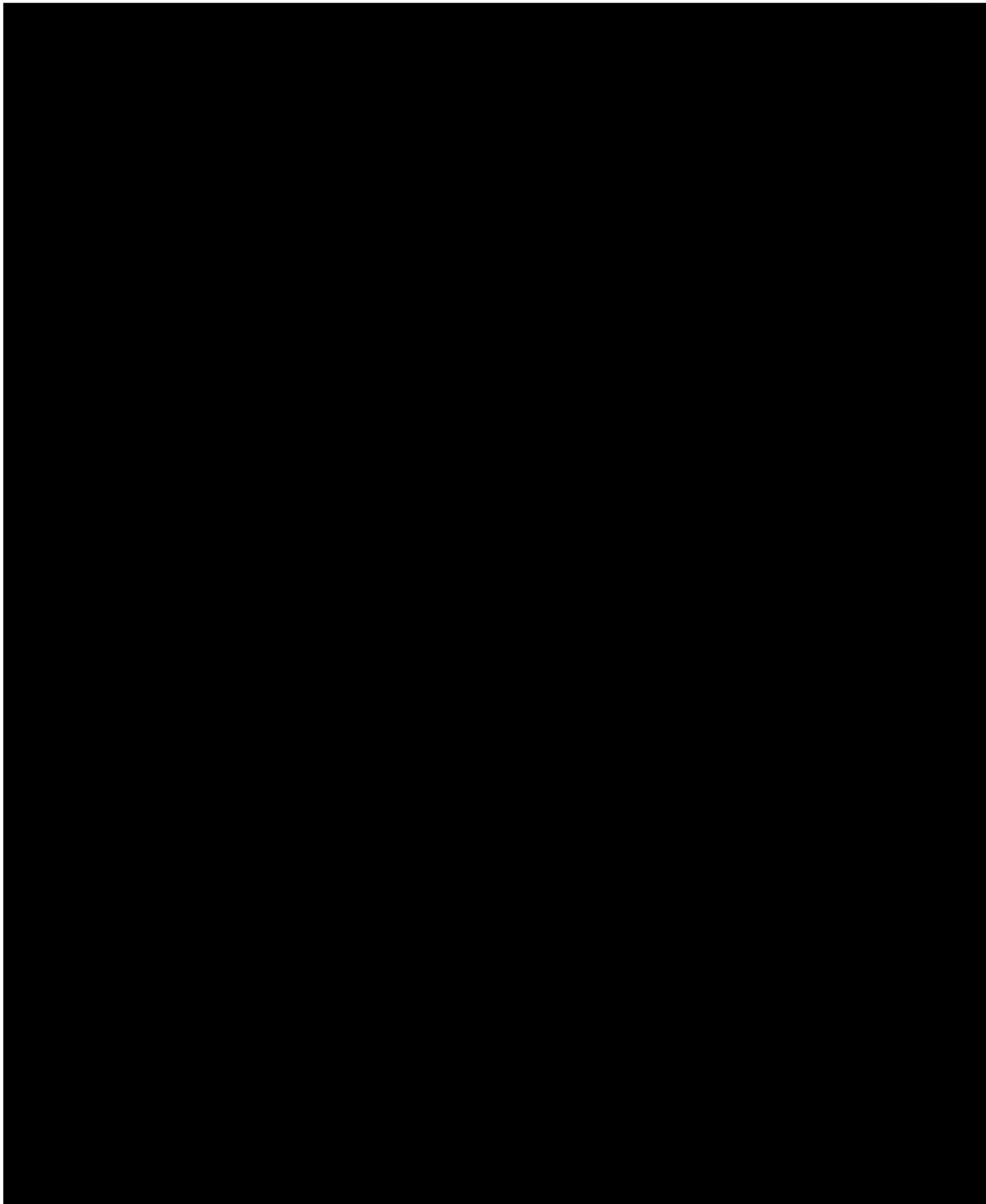


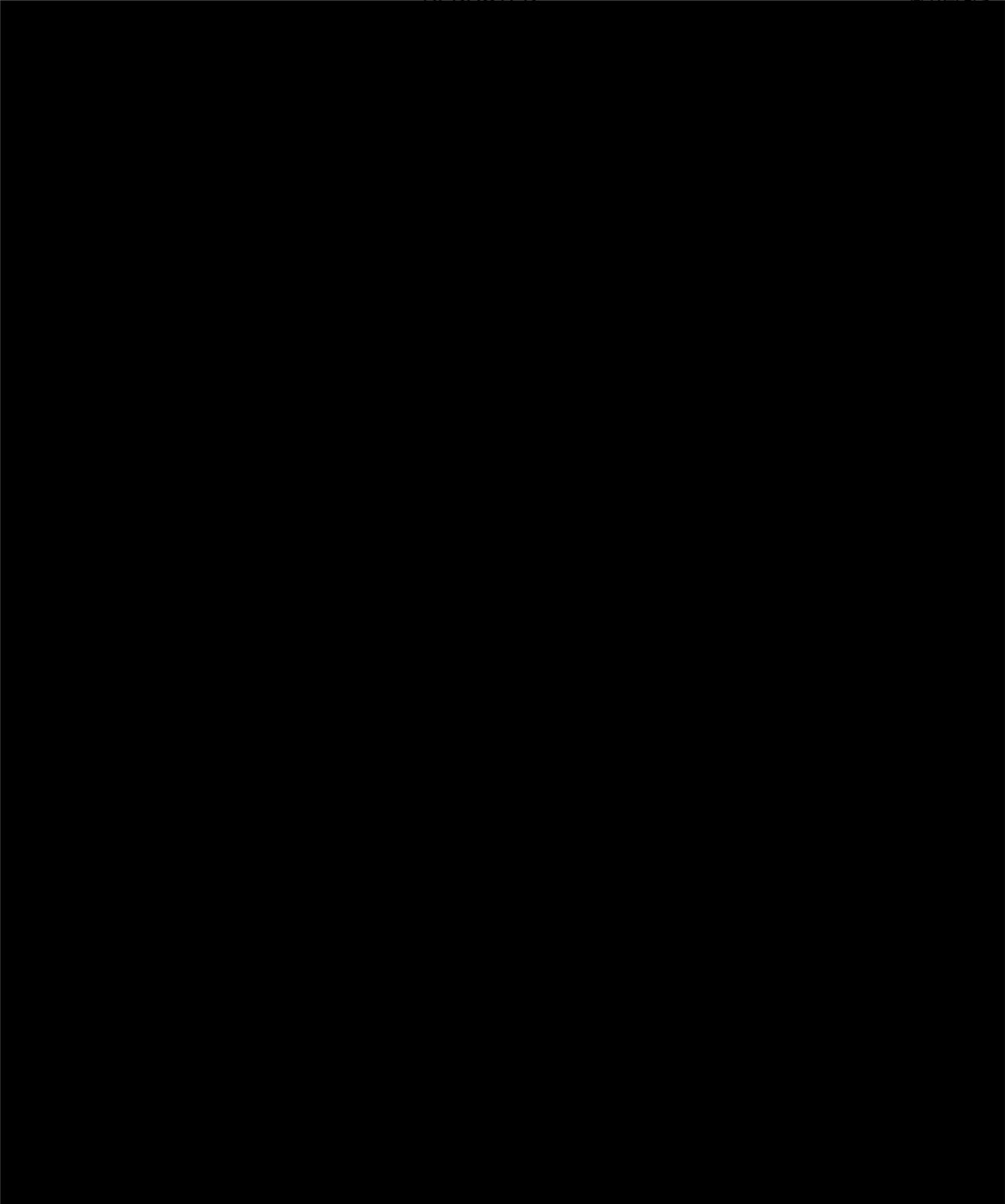


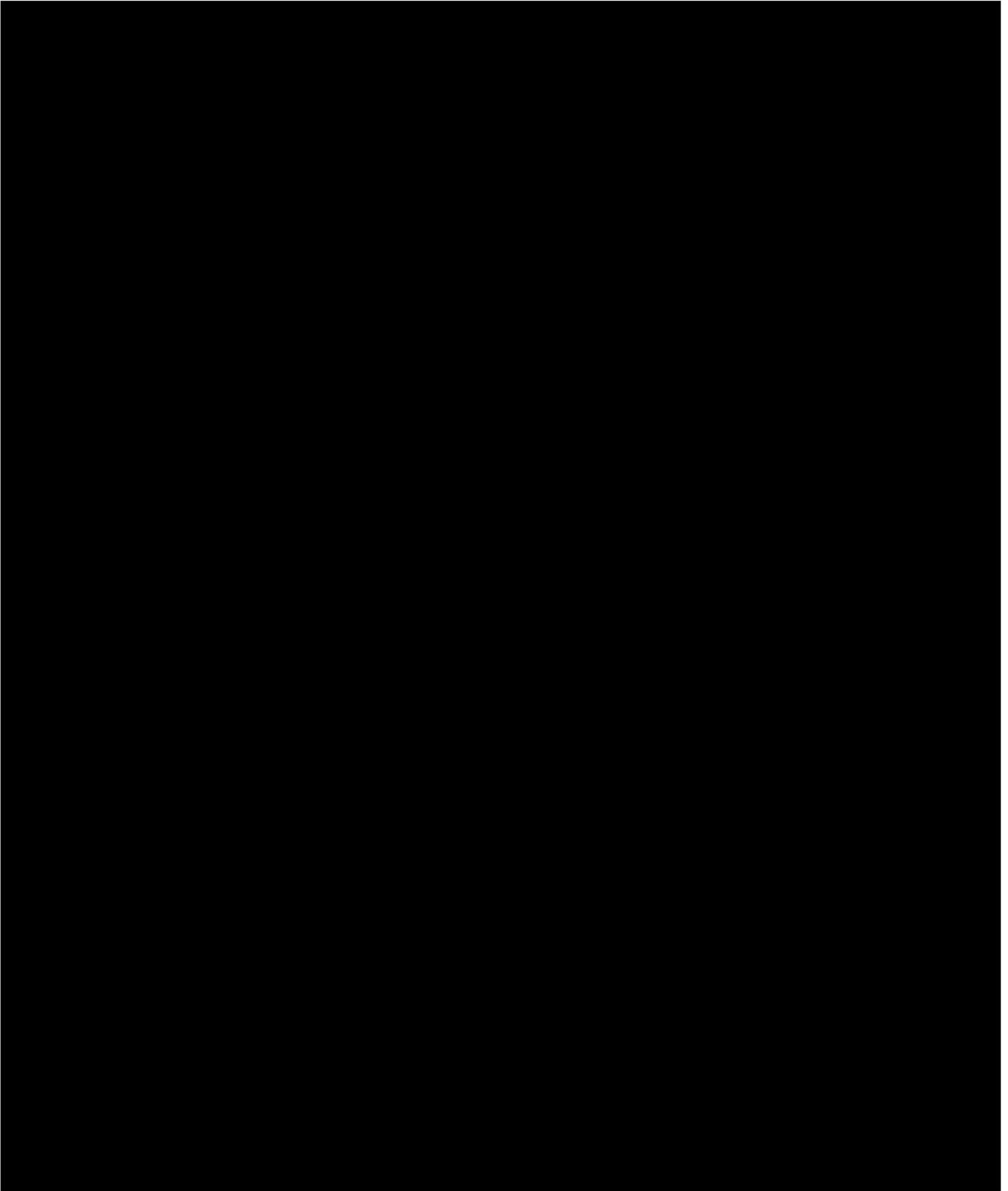


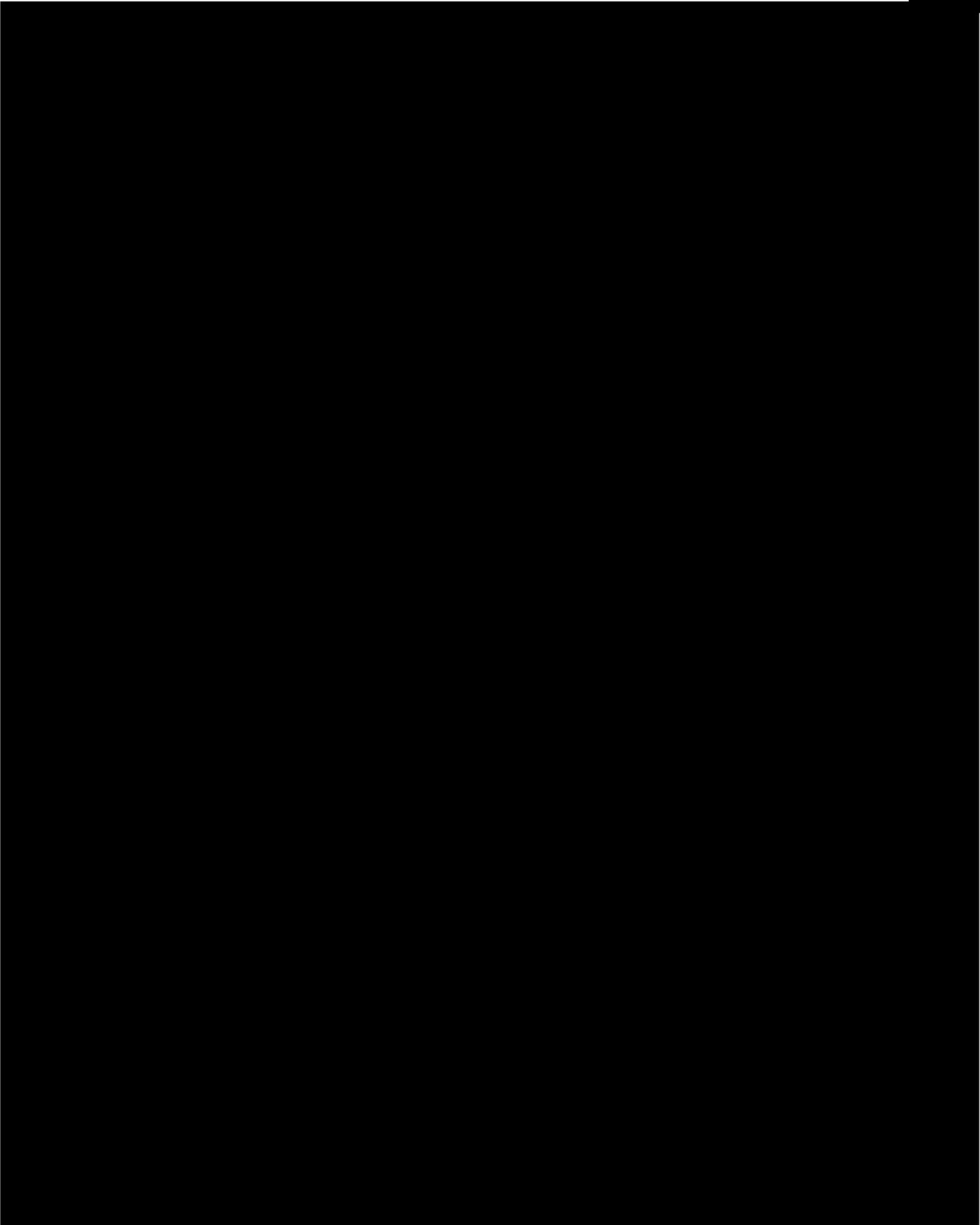


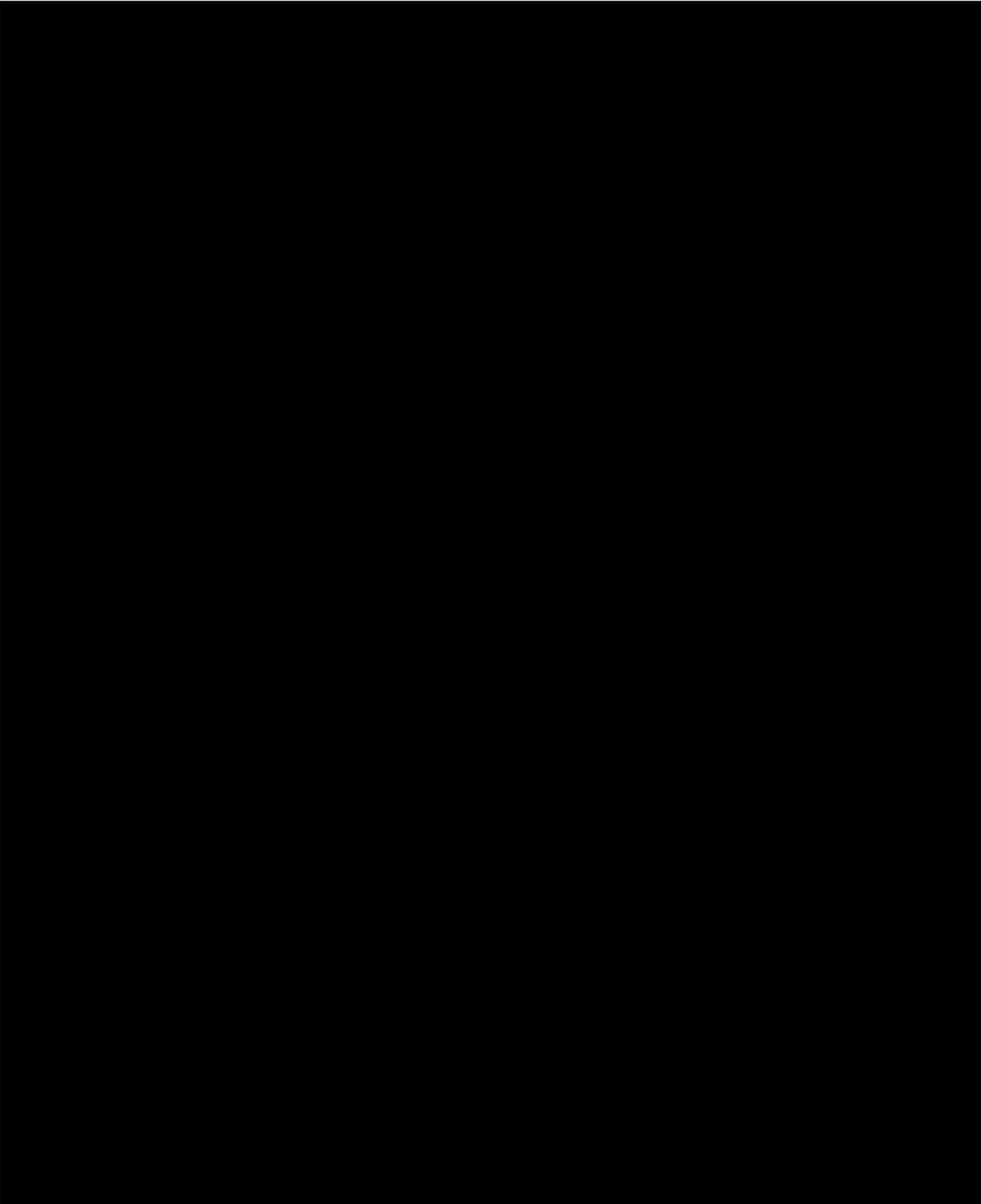




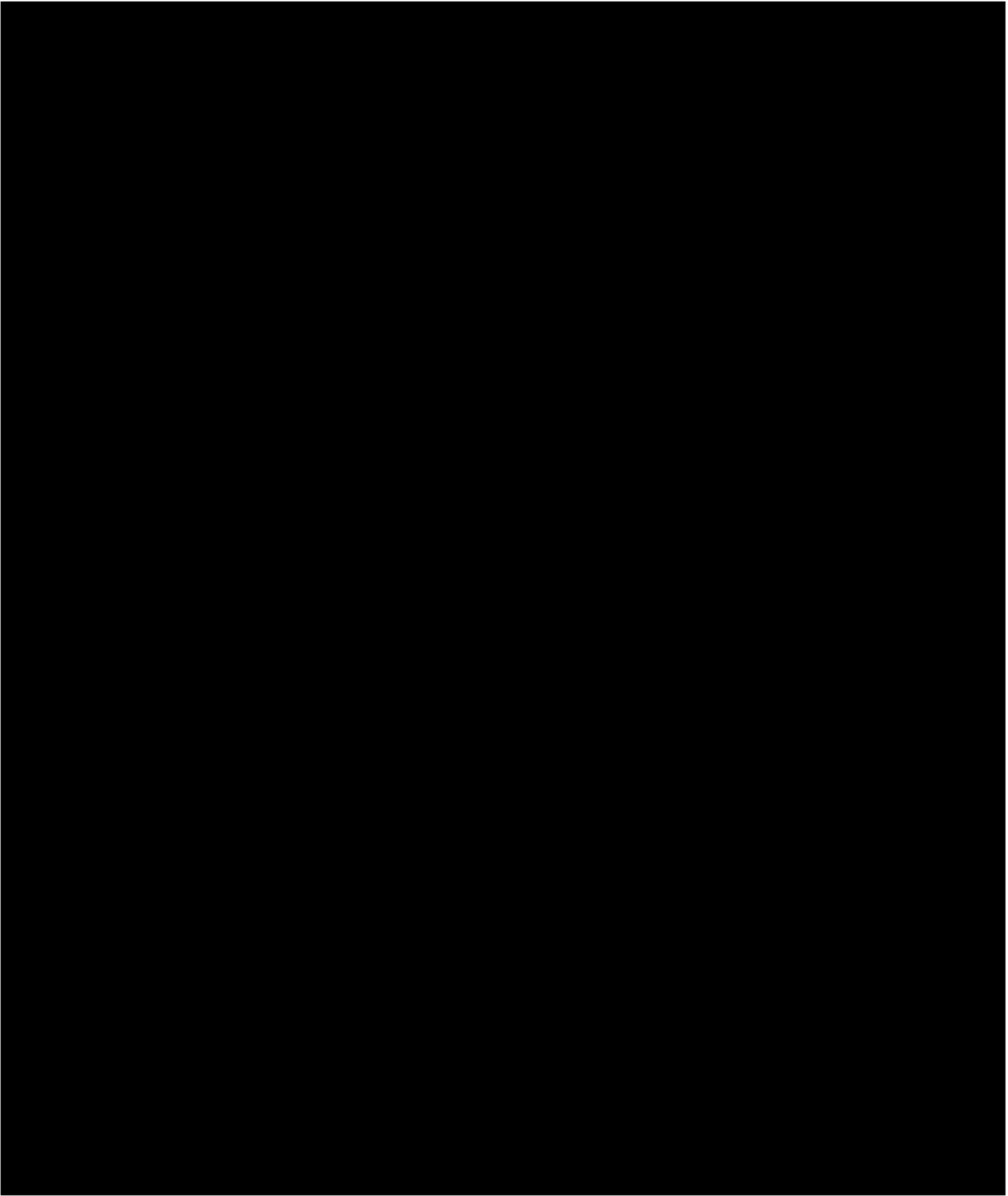


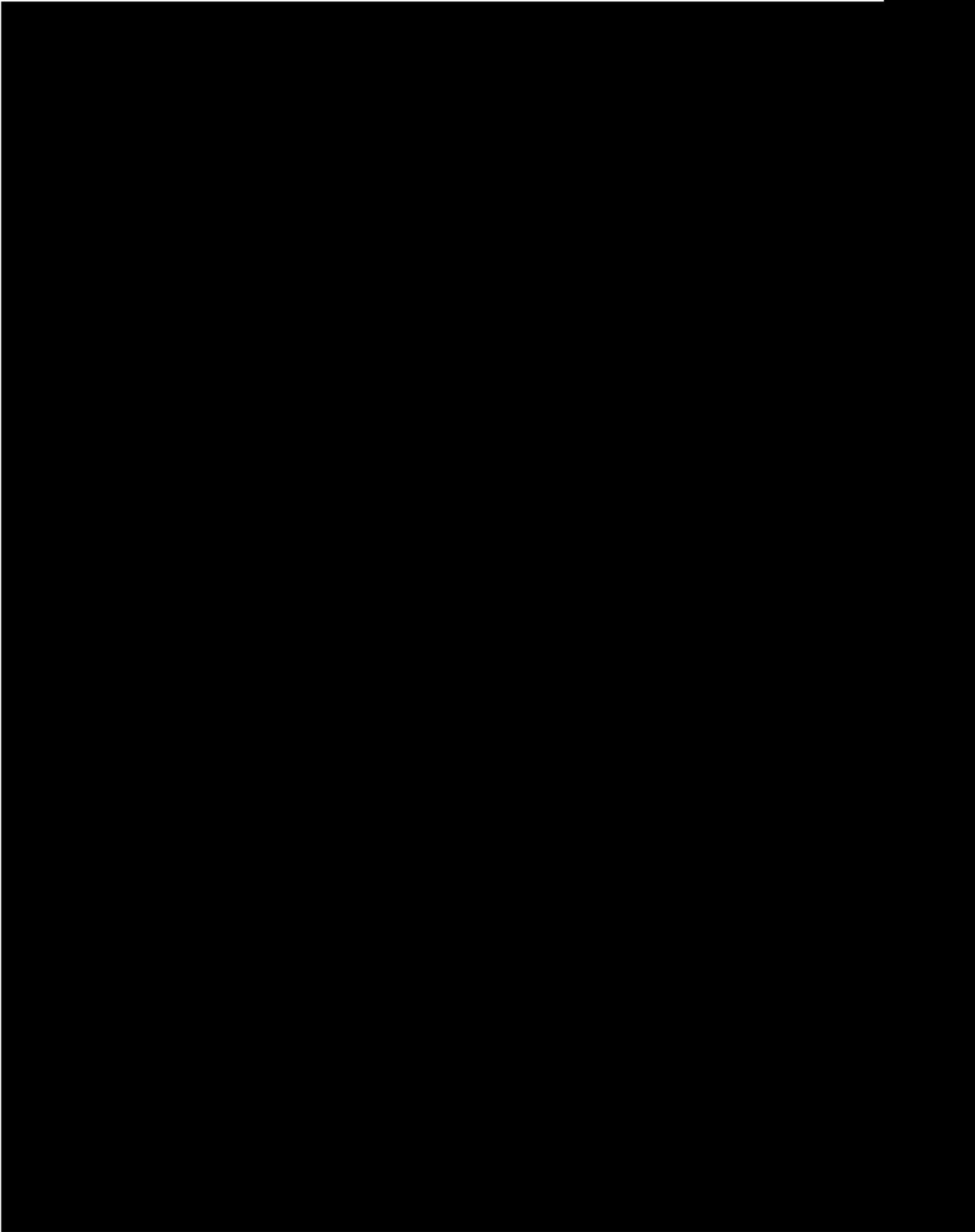


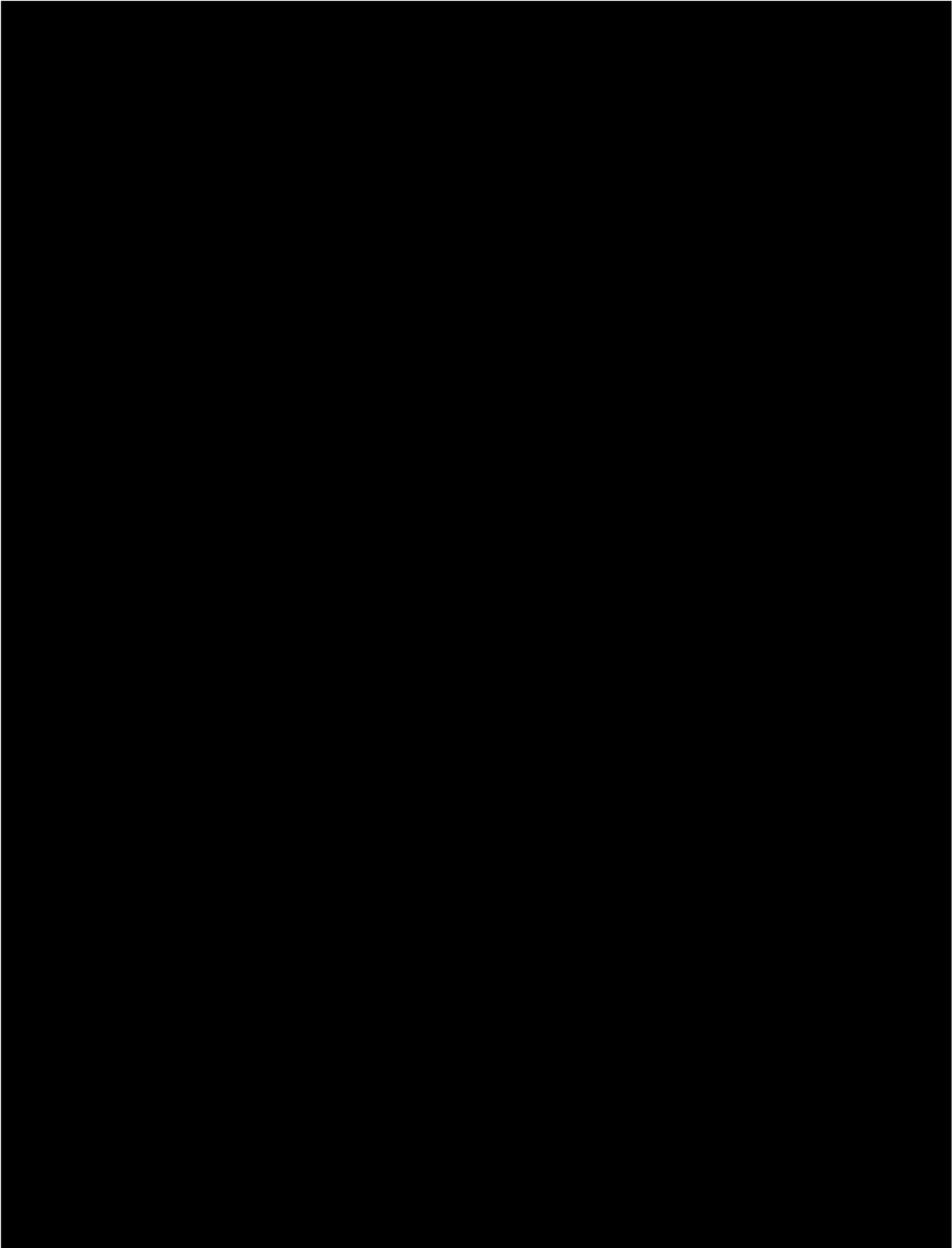


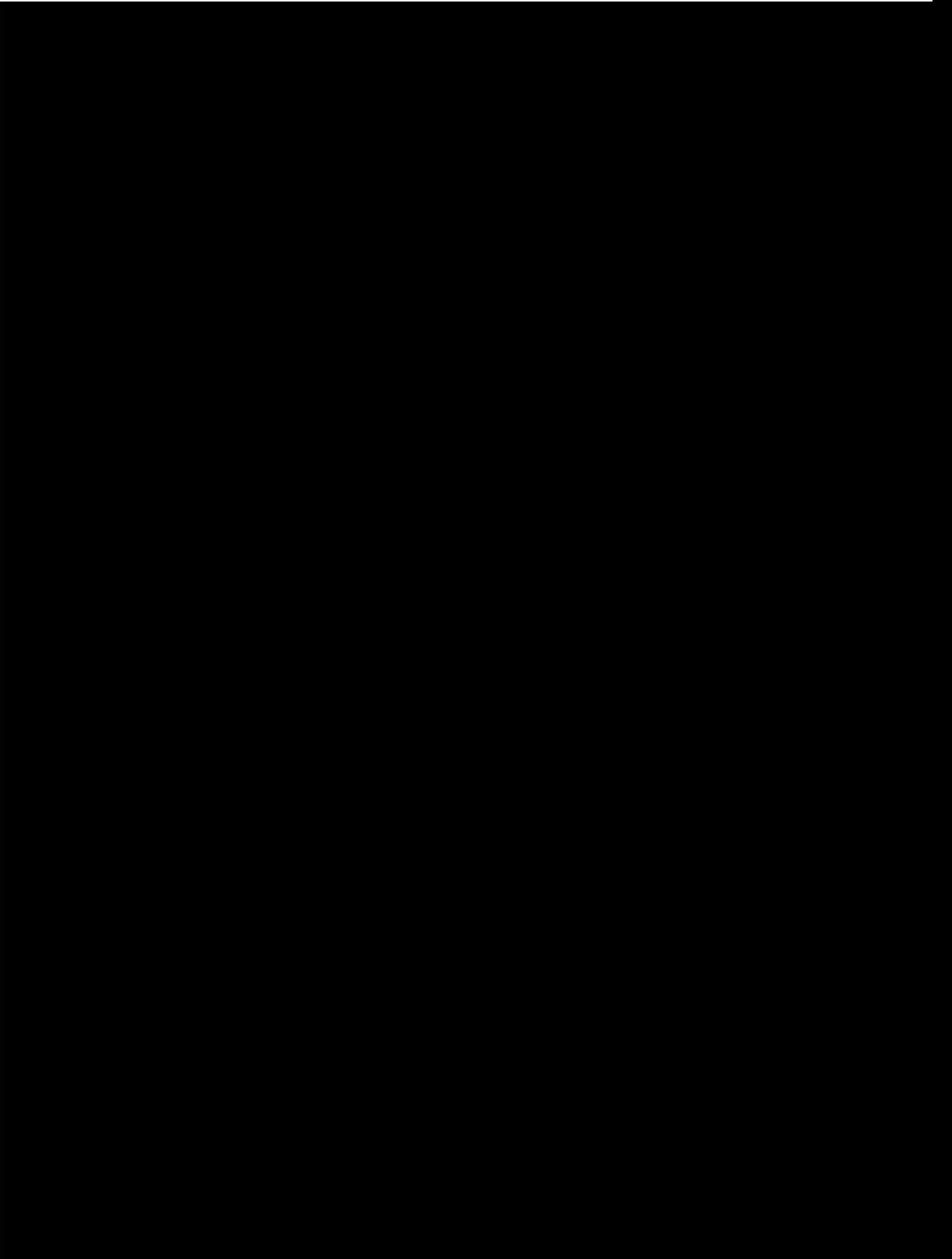


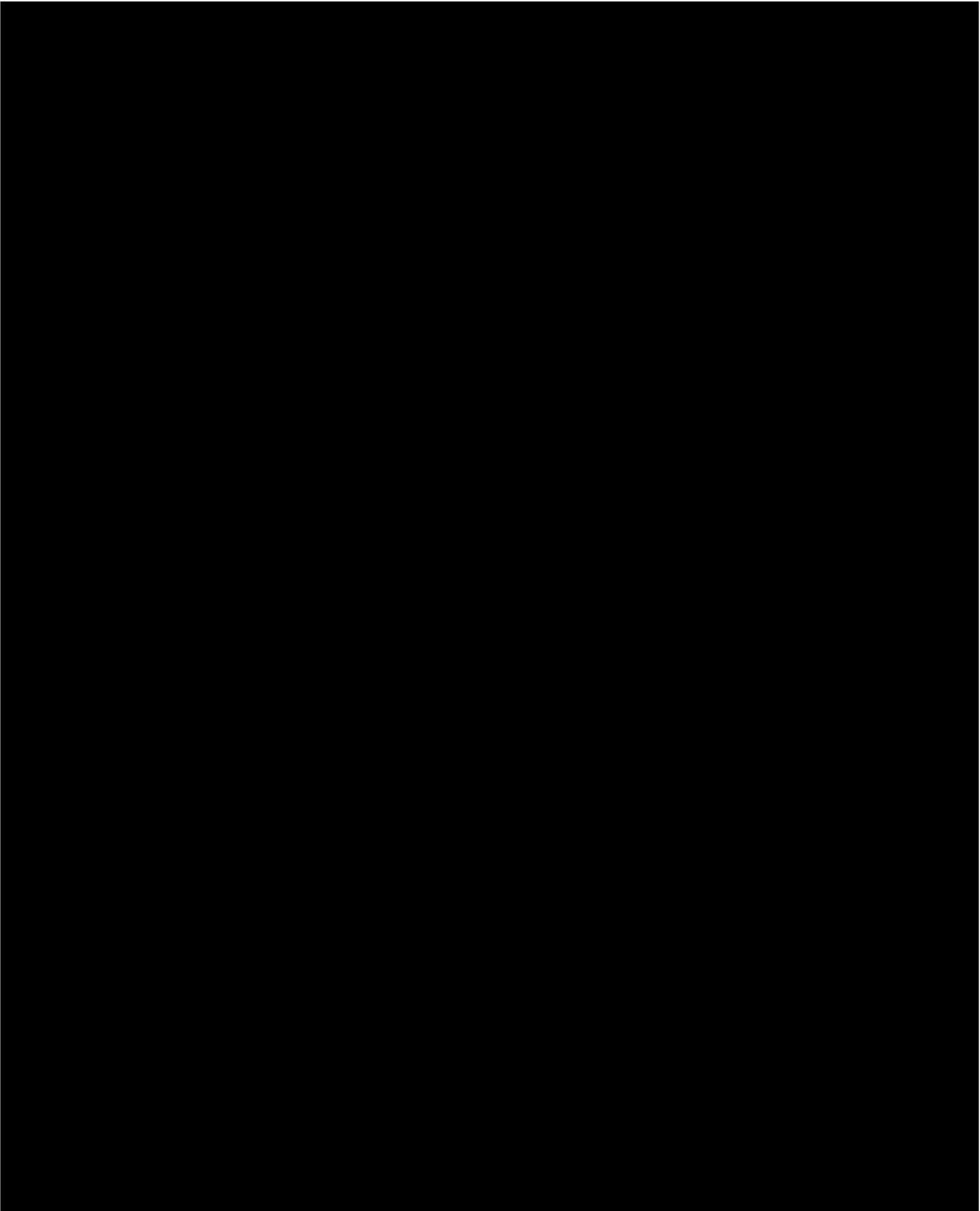


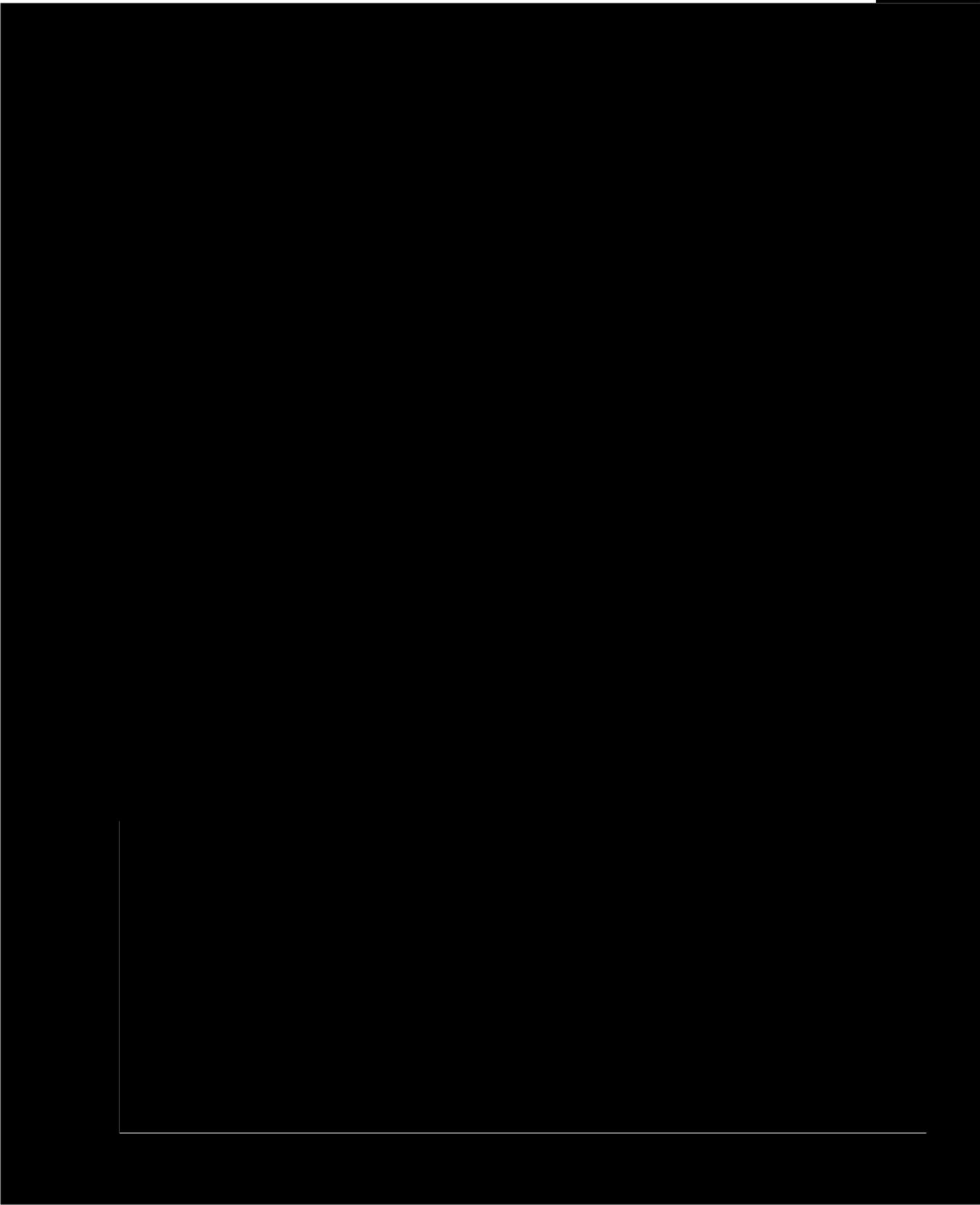


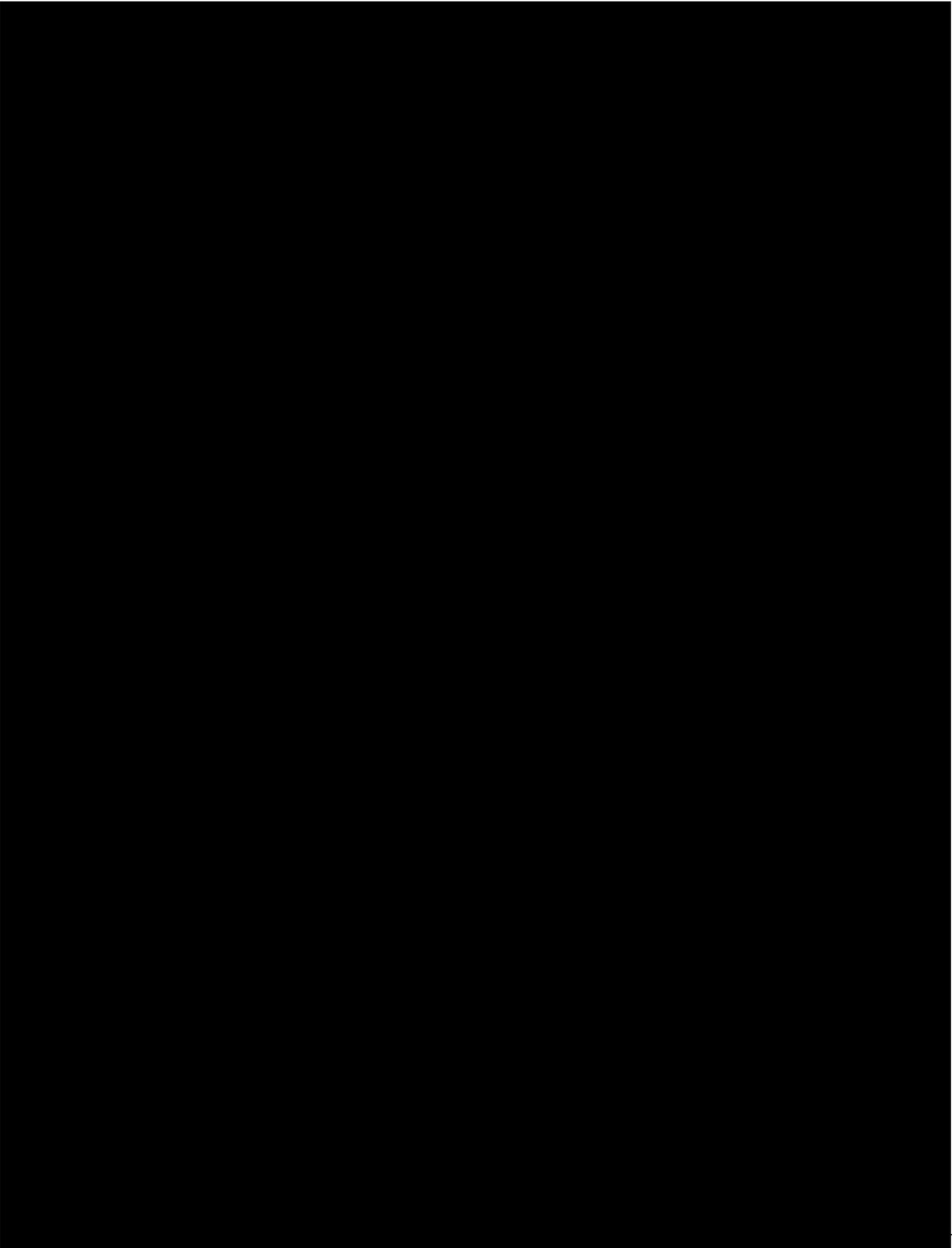


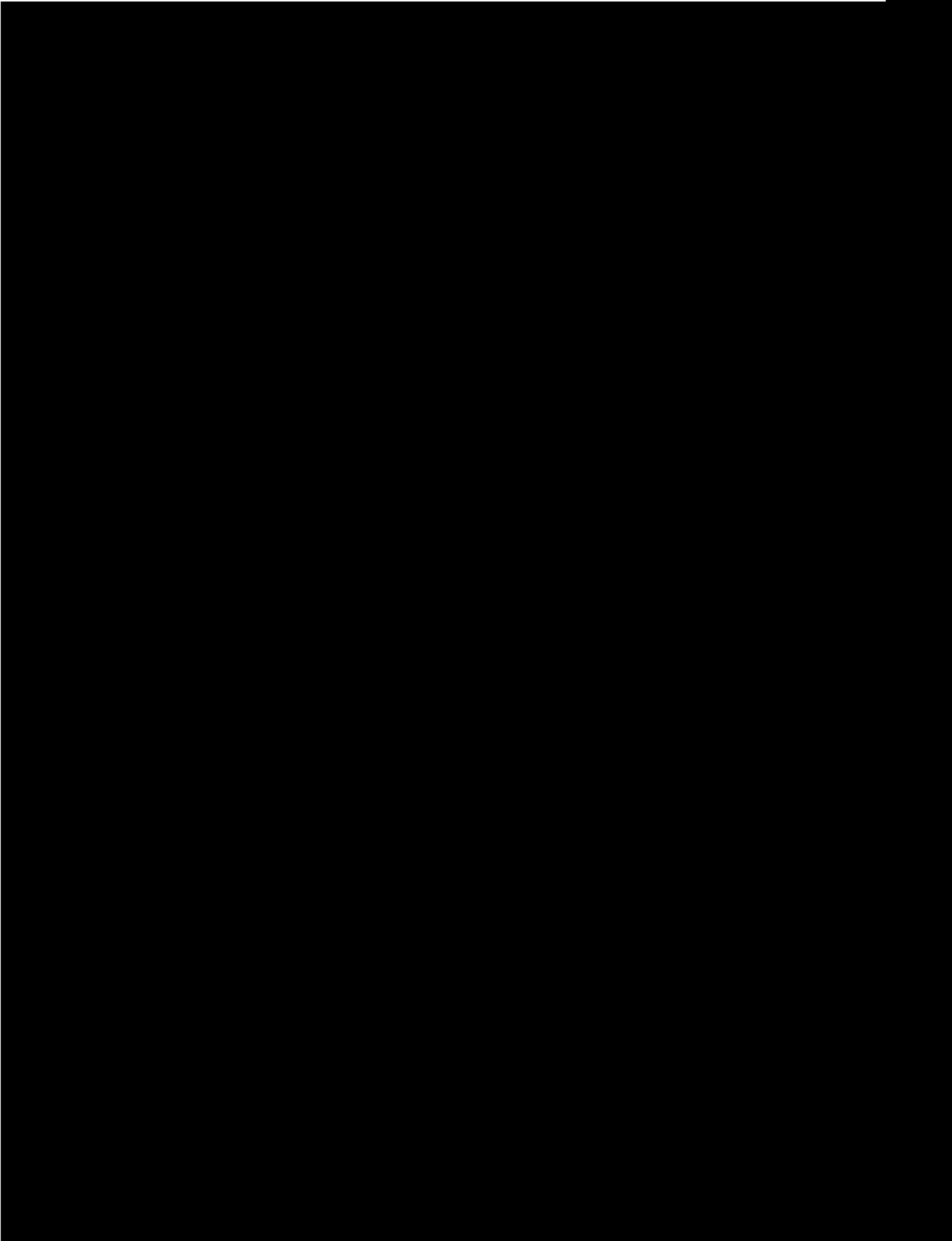












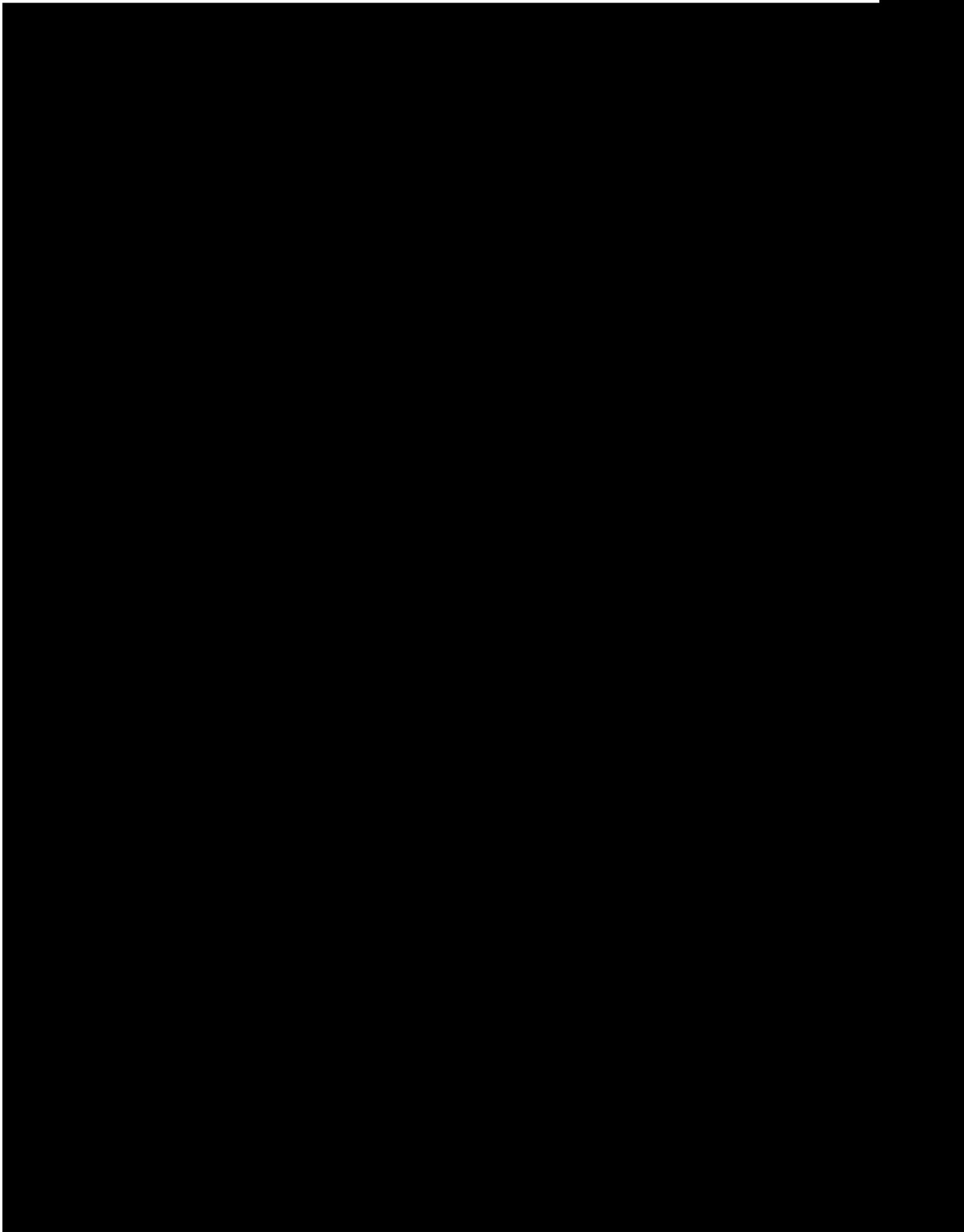


Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
DEF's Response to OPC's Sixth Set of Interrogatories (Nos. 43-51), specifically question 46	Question 46: The information after "defective" and before "which" is confidential.	<p>§366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
DEF's Response to OPC's Fifth Request to Produce (Nos. 21-24), specifically questions 21, 22 & 24	<p>Question 21: documents bearing bates numbers 20210001-DEF-000307 through 20210001-DEF-000330 are confidential in their entirety.</p> <p>Question 22: documents bearing bates numbers 20210001-DEF-000236 through 20210001-DEF-000241 are confidential in their entirety.</p> <p>Question 24: document bearing bates numbers 20210001-DEF-000243 -the remaining information in sentence after "Primary" the information after "consideration of" and before ""(100%" the</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>

	<p>information after “Primary” and before “part of” is confidential</p> <p>Question 24: document bearing bates numbers 20210001-DEF-000244 -all information after “Limit of Liability” is confidential</p> <p>Question 24: document bearing bates numbers 20210001-DEF-000285 through 20210001-DEF-000305 -all information is confidential in its entirety.</p> <p>Question 24: 20210001-DEF-000306 confidential in its entirety.</p>	
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Exhibit D

AFFIDAVIT OF REGINALD ANDERSON

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery
Clause with generating performance incentive
Factor

Docket No. 20200001-EI

Dated: November 8, 2021

**AFFIDAVIT OF REGINALD ANDERSON 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 Reginald Anderson, who being first duly sworn, on oath deposes and says that:

1. My name is Reginald Anderson. 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 Regulated & Renewable Energy Florida. I am responsible for the overall leadership and strategic direction of DEF's power generation fleet. My major duties and responsibilities include 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; retirement of generation facilities; asset allocation; workforce planning and staffing; organizational alignment and design; continuous business improvements; retention and inclusion; succession planning;

and oversight of hundreds of employees and hundreds of millions of dollars in assets and capital and O&M budgets.

3. DEF is seeking confidential classification for certain information contained its Response to OPC's Sixth Set of Interrogatories (Nos. 43-51), specifically question 46 and OPC's Fifth Request to Produce (Nos.21-24), specifically questions 21 and 22. 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 and ability to contract for goods and services on favorable terms.

4. The confidential information at issue relates to proprietary third-party and internal operating procedures and technical information regarding the third-party's proprietary component design and operation parameters, the disclosure of which would impair the third-party's competitive business interests, and if disclosed, the Company's competitive business interests and efforts to contract for goods or services on favorable terms. In order to contract with third-party vendors on favorable terms, DEF must keep third-party proprietary information confidential.

5. Further, if DEF cannot demonstrate to its third-party vendors and others that may enter contracts with DEF in the future, that DEF has the ability to protect those third-parties' confidential and proprietary business information, third-parties will be less likely to provide that information to DEF – harming DEF's ability to prudently operate its business. 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

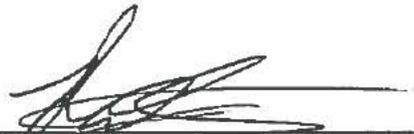
detrimentally impact DEF's ability to negotiate favorable contracts, as third-parties may begin to demand a "premium" to do business with DEF to account for the risk that its proprietary information will become a matter of public record, thereby harming DEF's competitive interests and ultimately its customers' financial interests.

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.

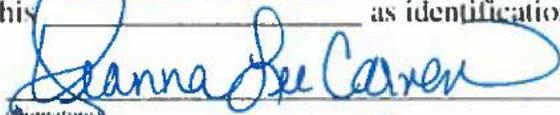
Further affiant sayeth not.

Dated the 8th day of November, 2021.



(Signature)
Reginald Anderson
Vice President – Generation Florida

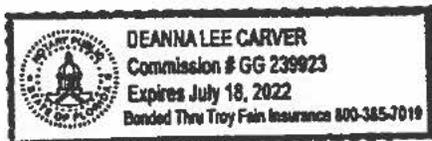
THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 8th day of November, 2021 by Reginald Anderson. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



(Signature)
Deanna Lee Carver

(Printed Name)

(AFFIX NOTARIAL SEAL)



NOTARY PUBLIC, STATE OF FL
July 18, 2022

(Commission Expiration Date)

(Serial Number, If Any)

Exhibit D

AFFIDAVIT OF ARNALDO GARCIA

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: November 8, 2021

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

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Arnaldo Garcia. 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 Insurance. This section is responsible for placing insurance coverage for Duke Energy and its subsidiaries, including DEF.

3. DEF is seeking confidential classification for certain information filed in response to OPC's Fifth Request to Produce Documents (Nos. 21-24), specifically question 24, submitted on October 21, 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.

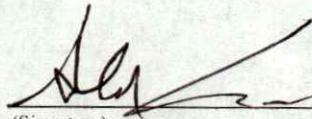
4. The confidential information at issue involves specific Insurance Policy (the "Policy") information. Disclosure of this information would impair the Company's competitive business interests and efforts to contract for goods or services on favorable terms. DEF has not publicly disclosed the material terms of the Policy. Without DEF's measures to maintain the confidentiality of this sensitive business information, DEF's ability to contract with third parties would be undermined to the detriment of DEF's competitive business interests and ultimately to the detriment of its customers' interests.

5. 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.

6. This concludes my affidavit.

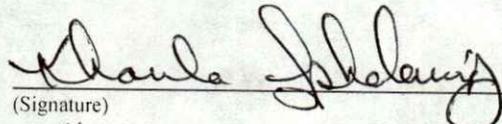
Further affiant sayeth not.

Dated the 5 day of Nov, 2021.



(Signature)
Arnaldo Garcia
Director, Insurance
Duke Energy
550 Tryon Street
Charlotte, NC 28202

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 5 day of November, 2021 by Arnaldo Garcia. He is personally known to me, or has produced his # 0000 21532196 driver's license, or his _____ as identification.



(Signature)

Khamla Sphabmixay
(Printed Name)

NOTARY PUBLIC, STATE OF NC

07/27/2025
(Commission Expiration Date)

15400036
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

Khamla Sphabmixay
NOTARY PUBLIC
Mecklenburg County, NC
My Commission Expires July 27, 2025