

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection Plan
Plan Pursuant to Rule 25-6.030, F.A.C., Duke
Energy Florida, LLC

Docket No. 20220050-EI

Dated: July 13, 2022

**NOTICE OF FILING AFFIDAVIT IN SUPPORT OF
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida, LLC hereby gives notice of filing the Affidavit of Christopher Menendez in support of DEF's Request for Confidential Classification, submitted for filing on June 6, 2022 (document number 03450-2022), regarding its Response to OPC's Third Request for Production of Documents (Nos. 35-41),

Respectfully submitted this 13th day of July, 2022.

s/ Matthew R. Bernier

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 13th day of July, 2022, to all parties of record as indicated below.

s/ Matthew R. Bernier
Attorney

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection Plan
Plan Pursuant to Rule 25-6.030, F.A.C., Duke
Energy Florida, LLC

Docket No. 20220050-EI

Dated: July 13, 2022

**AFFIDAVIT OF CHRISTOPHER MENENDEZ 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 Christopher Menendez, who being first duly sworn, on oath deposes and says that:

1. My name is Christopher Menendez. 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 Rates and Regulatory Planning in the Rates and Regulatory Strategy Department. This department is responsible for the Company's revenue requirements and rate impacts, regulatory planning, and cost recovery.

3. As the Director of Rates and Regulatory Planning, I am responsible for the Company's regulatory planning and cost recovery, including the Company's Storm Protection Plan filing.

4. DEF is seeking confidential classification for certain information provided in its response to OPC's Third Request for Production of Documents (Nos. 35-41), specifically question 39, bearing bates numbers 20200050-DEF-005285 through 20200050-DEF-319. 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.

5. The confidential information at issue relates to proprietary and confidential internal presentations, rates, costs, processes, and procedures. DEF must ensure that sensitive business information is kept confidential, the disclosure of which would impair the Company's competitive interests and ability to contract on favorable terms.

6. Further, if the information at issue was disclosed, DEF's efforts to obtain contracts that provide economic value to both DEF and its customers could be compromised by competitors and vendors changing their purchasing behavior within the relevant markets – 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, 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.

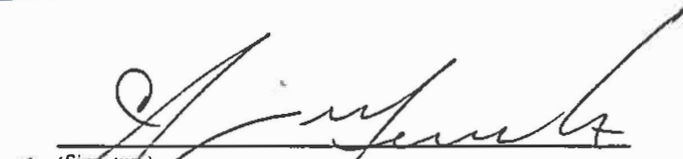
7. Upon receipt of its own confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information

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.

8. This concludes my affidavit.


Further affiant sayeth not.

Dated the 5th day of July, 2022.



(Signature)
Christopher Menendez
Director of Rates & Regulatory Planning
Rates & Regulatory Strategy

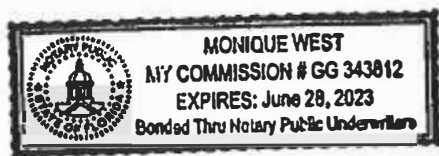
THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 5th day of July, 2022 by Christopher Menendez. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



(Signature)
Monique West

(Printed Name)

(AFFIX NOTARIAL SEAL)



NOTARY PUBLIC, STATE OF _____

(Commission Expiration Date)

(Serial Number, If Any)