



Dianne M. Triplett
DEPUTY GENERAL COUNSEL

May 29, 2024

VIA ELECTRONIC MAIL

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

Re: Docket 20240025-EI, Petition for Rate Increase by Duke Energy Florida, LLC

Dear Mr. Teitzman,

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF"), DEF's Amended Request for Confidential Classification for certain information provided in its Responses to OPC's Seventh Set of Interrogatories (Nos. 144-210) and Request for Production of Documents (Nos. 66-77). The filing includes the following:

- DEF's Request for Confidential Classification
- Slip-sheet for confidential Exhibit A
- Redacted Exhibit B (two copies)
- Exhibit C (justification matrix), and
- Exhibit D (affidavits Caldwell, Goff, Lloyd, Olivier, Panizza, and Scott)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on May 7, 2024, under separate cover. Exhibits B and Revised Exhibit D were omitted from the original filing. There are no other changes to the filing. Please replace the attached with document number 04334-2024 filed on May 28, 2024.

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/mw
Attachments

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC
for rate increase

DOCKET NO. 20240025-EI

Dated: May 29, 2024

**DUKE ENERGY FLORIDA, LLC'S
AMENDED 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 Amended Request for Confidential Classification (“Request”) for certain information contained in its Response to OPC’s Seventh Request for Production of Documents (Nos. 66-77) and Seventh Set of Interrogatories (Nos. 144-210). DEF’s Notice of Intent to Request Confidential Classification was filed May 7, 2024. This Request is timely. *See* Rule 25-22.006(3)(a)1, E.A.C. In support of this Request, DEF states:

1. Documents responsive to OPC’s Seventh Request for Production of Documents, specifically, Questions 66, 68, 71, and 72, and OPC’s Seventh Set of Interrogatories, specifically, Questions 155, 158, 160, 166, 186, 206, 207, and 208, contain “confidential proprietary business information” under Section 366.093(3), F.S.

2. The following exhibits are included with this request:

(a) Sealed Composite Exhibit A is a package containing unredacted copies of all documents for which DEF seeks confidential treatment. Composite Exhibit A was submitted separately in a sealed envelope labeled “CONFIDENTIAL” on May 7, 2024. 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 DEF 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 includes affidavits of Edward L. Scott, Brian M. Lloyd, John R. Panizza, Marcia J. Olivier, Shannon Caldwell, and Vanessa Goff, attesting to the confidential nature of the information identified in Exhibit C.

3. As indicated in Exhibits C and D, the information for which DEF requires confidential classification is “proprietary confidential business information” within the meaning of § 366.093(3), F.S. Specifically:

(a) The information at issue in DEF’s response to OPC’s Seventh Set of Interrogatories, Question 186, includes internal sensitive business information regarding future projects and capital investments. That information relates to DEF’s competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF’s ability to compete in the marketplace.

(b) The information at issue in DEF’s responses to OPC’s Seventh Set of Interrogatories, Questions 155, 158, 160, 166, and 186, includes pricing information relating to contracts for goods and services. Disclosure of this non-public information could alter contractors’ behavior to the detriment of DEF, its customers, and its affiliates. Thus,

absent confidential classification, DEF and its affiliates' efforts to contract for goods and services on favorable terms may be impaired.

(c) The information at issue in DEF's responses to OPC's Seventh Set of Interrogatories, Questions 206-208, includes internal sensitive business information relating to DEF's actual and estimated property tax rates. That information relates to DEF's competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF's ability to compete in the marketplace.

(d) The information at issue in DEF's responses to OPC's Seventh Request for Production of Documents, Question 72, includes internal sensitive business information regarding DEF's long-term strategic plans as well as future transmission projects and capital investments. That information relates to DEF's competitive business interests, and, absent confidential classification, its disclosure would impair DEF's ability to compete in the marketplace.

(e) The information at issue in DEF's response to OPC's Seventh Request for Production of Documents, Questions 66 and 68, includes internal sensitive business information that relates to internal compensation procedures and amounts, as well as incentive plans, the disclosure of which would impair the efforts of the Company to negotiate on favorable terms. Additionally, if the information at issue was disclosed, DEF's efforts to obtain employees at a competitive rate that provides economic value to both DEF and its customers could be compromised. With this non-public information, employers and potential hires could alter their behavior to the detriment of DEF and its customers. Absent confidential classification, competitors would have access to this sensitive business information, which may impair DEF's ability to effectively hire employees at a competitive

rate (and, thus, to contract for goods and services on favorable terms).

4. The information identified in Exhibits A and C is intended to be and is treated as confidential by DEF. *See* Exhibit D. Further, that information has not been disclosed to the public. *See* Exhibit D.

5. It follows that the information identified in Exhibits A and C is proprietary confidential information, which would cause harm to DEF and ratepayers if disclosed and which is exempt from disclosure under the Public Records Act pursuant to § 366.093(3), F.S.

6. Accordingly, 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 be granted.

RESPECTFULLY SUBMITTED this 29th day of May, 2024.

/s/Dianne M. Triplett

DIANNE TRIPLETT

Deputy General Counsel
299 1st Avenue North
St. Petersburg, Florida 33701
T: (727) 820-4692
E: dianne.triplett@duke-energy.com

MATTHEW R. BERNIER

Associate General Counsel
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
T: (850) 521-1428
E: matt.bernier@duke-energy.com

STEPHANIE A. CUELLO

Senior Counsel
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
T: (850) 521-1425
E: stephanie.cuello@duke-energy.com
FLRegulatoryLegal@duke-energy.com

Attorneys for Duke Energy Florida, LLC

CERTIFICATE OF SERVICE
Docket No. 20240025-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 29th day of May, 2024.

/s/ Dianne M. Triplett
Attorney

<p>Jennifer Crawford / Major Thompson / Shaw Stiller Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 JCrawfor@psc.state.fl.us MThomпсо@psc.state.fl.us SStiller@psc.state.fl.us</p>	<p>Walt Trierweiler / Charles J. Rehwinkel / Mary Wessling / Austin Watrous Office of Public Counsel 111 W. Madison St., Rm 812 Tallahassee, FL 32399 rehwinkel.charles@leg.state.fl.us trierweiler.walt@leg.state.fl.us watrous.austin@leg.state.fl.us wessling.mary@leg.state.fl.us</p>
<p>Jon C. Moyle, Jr. / Karen A. Putnal Moyle Law Firm, P.A. FIPUG 118 North Gadsden Street Tallahassee, Florida 32301 jmoyle@moylelaw.com kputnal@moylelaw.com</p>	<p>Bradley Marshall / Jordan Luebkekmann Earthjustice LULAC & FL Rising 111 S. Martin Luther King Jr. Blvd. Tallahassee, Florida 32301 bmarshall@earthjustice.org jluebkekmann@earthjustice.org</p>
<p>Tony Mendoza / Patrick Woolsey Sierra Club 2101 Webster Street Suite 1300 Oakland, CA 94612 tony.mendoza@sierraclub.org patrick.woolsey@sierraclub.org</p>	<p>Robert Scheffel Wright / John T. LaVia, III Gardner, Bist, Bowden, Dee, LaVia, Wright, Perry & Harper, P.A. Florida Retail Federation 1300 Thomaswood Drive Tallahassee, Florida 32308 schef@gbwlegal.com jlavia@gbwlegal.com</p>
<p>Sari Amiel Sierra Club 50 F St. NW, Eighth Floor Washington, DC 20001 sari.amiel@sierraclub.org</p> <p>James W. Brew / Laura Wynn Baker / Sarah B. Newman Stone Mattheis Xenopoulos & Brew, PC PCS Phosphate-White Springs 1025 Thomas Jefferson Street, NW Suite 800 West Washington, DC 20007-5201 jbrew@smxblaw.com lwb@smxblaw.com sbn@smxblaw.com</p>	<p>Peter J. Mattheis / Michael K. Lavanga / Joseph R. Briscar Stone Mattheis Xenopoulos & Brew, PC NUCOR 1025 Thomas Jefferson Street, NW Suite 800 West Washington, DC 20007-5201 pjm@smxblaw.com mkl@smxblaw.com jrb@smxblaw.com</p> <p>William C. Garner Law Office of William C. Garner, PLLC SACE 3425 Bannerman Road Unit 105, No. 414 Tallahassee, FL 32312 bgarner@wcgloffice.com</p>

Exhibit A

“CONFIDENTIAL”

(filed under separate cover on May 7, 2024)

Exhibit B

REDACTED

(copy-one)

CITIZENS' SEVENTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 144-210)

ROG 7-155 Response

	Actual	Actual	Actual	Projected	CONFIDENTIAL Projected	CONFIDENTIAL Projected	CONFIDENTIAL Projected
Underground Cable Replacements	2021	2022	2023	2024	2025	2026	2027
Installations (Miles)	203.7	228	259	223.6			
CapEx Spend	\$ 42,274,809	\$ 47,409,389	\$ 67,760,514	\$ 47,156,551			

CITIZENS' SEVENTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 144-210)

ROG 7-158 Response

	Actual	Actual	Actual	Projected	CONFIDENTIAL	CONFIDENTIAL	CONFIDENTIAL
	2021	2022	2023	2024	2025	2026	2027
TripSavers							
Installations	4,700	3,300	1,100	1,300			
CapEx Spend	\$ 41,287,332	\$ 19,531,769	\$ 9,249,261	\$ 13,538,010			

REDACTED
DOCUMENTS BEARING BATES NUMBER 20240025-
OPCROG7-00018109 THROUGH 20240025-
OPCROG7-00018110
ARE REDACTED IN THEIR ENTIRETY

CITIZENS' SEVENTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 144-210)

ROG 7-166 Response

	Actual	Actual	Actual	Actual	Actual	Projected	CONFIDENTIAL	CONFIDENTIAL	CONFIDENTIAL
	2019	2020	2021	2022	2023	2024	Projected	Projected	Projected
Maintenance Programs CapEx Spend							2025	2026	2027
Pole Replacement Program	\$ 32,935,018	\$ 17,075,642	\$ 18,539,932	\$ 22,191,412	\$ 22,030,590	\$ 20,357,057			
Capacitor Replacement Program	\$ 3,608,220	\$ 2,645,565	\$ 3,684,763	\$ 7,961,567	\$ 6,900,817	\$ 3,563,935			
Underground Cable Replacement Program	\$ 30,673,113	\$ 29,212,463	\$ 42,290,276	\$ 48,089,673	\$ 67,627,312	\$ 47,156,551			
Transformer Maintenance Program	\$ 9,413,069	\$ 7,720,208	\$ 8,187,051	\$ 19,367,901	\$ 14,388,317	\$ 11,161,614			
Other	\$ 12,710,971	\$ 6,547,505	\$ 10,964,308	\$ 15,811,879	\$ 30,428,658	\$ 17,258,497			

2025 Solar	Named Project	Filing In Service Date	Planned In Service Date	Permitting Status	Planned Construction Start	Filed Project Cost	Anticipated Project Cost
2025 - Project #1	Sundance	March 2025	March 2025	Expected May 2024	May 2025		
2025 - Project #2	Rattler	March 2025	December 2025	Expected 3Q 2024	1Q 2025		
2025 - Project #3	Half Moon	December 2025	January 2026	Expected 3Q 2024	1Q 2025		
2025 - Project #4	Bailey Mill	December 2025	January 2026	Expected 3Q 2024	1Q 2025		
2025 - Project #5	-	December 2025	June 2026	Expected 1Q 2025	3Q 2025		
2025 - Project #6	-	December 2025	June 2026	Expected 1Q 2025	3Q 2025		
2026 - Project #1	-	June 2026	June 2026	Expected 1Q 2025	3Q 2025		
2026 - Project #2	-	June 2026	December 2026	Expected 3Q 2025	1Q 2026		
2026 - Project #3	-	June 2026	December 2026	Expected 3Q 2025	1Q 2026		
2026 - Project #4	-	June 2026	June 2027	Expected 1Q 2026	3Q 2026		
2027 - Project #1	-	June 2027	June 2027	Expected 1Q 2026	3Q 2026		
2027 - Project #2	-	June 2027	June 2027	Expected 1Q 2026	3Q 2026		
2027 - Project #3	-	June 2027	December 2027	Expected 3Q 2026	1Q 2027		
2027 - Project #4	-	June 2027	December 2027	Expected 3Q 2026	1Q 2027		

Response:

DEF Generation has been able to maintain and even reduce its operating expenses associated with day-to-day operations of the generation fleet with the implementation of its heat rate efficiency projects. These projects result in more efficient generation units, with increased output and reduced fuel consumption. By operating the more efficient units longer and with greater flexibility DEF is able to reduce the unit load at its less efficient coal units. Through improved unit flexibility, reliability and operations performance, the Company's unit operating costs have not increased, and DEF's Power Generation Organization has absorbed increased labor costs, inflation, and supply chain increases without increasing its base budgets.

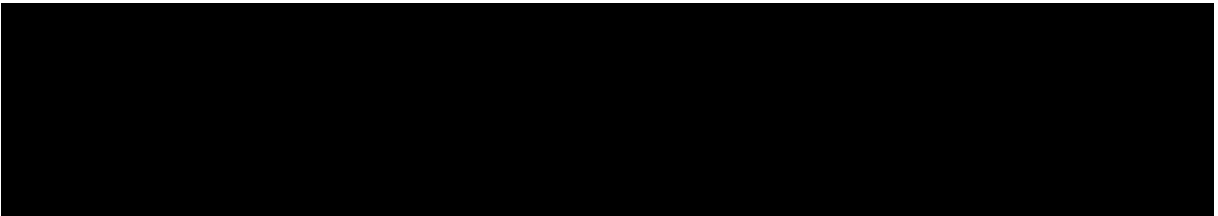
Please reference the attached document bearing Bates numbers 20240025-OPCPOD7-00018059 and those documents provided in response to LULAC POD 1-2.

REDACTED

68. **Customer delivery budgets.** Refer to the testimony of Brian Lloyd, at page 15, lines 11-14. Provide each document containing any analysis the Company has prepared showing the referenced historical trends and forecasted levels.

Response:

Please see attachment bearing Bates numbers 20240025-OPCPOD7-00018061.



of customers and associated volumes of energy produced/required.

REDACTED
DOCUMENTS BEARING BATES NUMBERS
20240025-OPCPOD7-00017308 through 20240025-
OPCPOD7-00017441 and

20240025-OPCROG6-00018088 through 20240025-
OPCROG6-00018097 ARE REDACTED IN THEIR
ENTIRETY

REDACTED
DOCUMENTS BEARING BATES NUMBERS
20240025-OPCPOD7-00017442 through 20240025-
OPCPOD7-00017507 ARE REDACTED IN THEIR
ENTIRETY

REDACTED
DOCUMENTS BEARING BATES NUMBERS
20240025-OPCPOD7-00017583 through 20240025-
OPCPOD7-00017970 ARE REDACTED IN THEIR
ENTIRETY

Exhibit B

REDACTED

(copy-two)

CITIZENS' SEVENTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 144-210)

ROG 7-155 Response

	Actual	Actual	Actual	Projected	CONFIDENTIAL Projected	CONFIDENTIAL Projected	CONFIDENTIAL Projected
Underground Cable Replacements	2021	2022	2023	2024	2025	2026	2027
Installations (Miles)	203.7	228	259	223.6			
CapEx Spend	\$ 42,274,809	\$ 47,409,389	\$ 67,760,514	\$ 47,156,551			

CITIZENS' SEVENTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 144-210)

ROG 7-158 Response

	Actual	Actual	Actual	Projected	CONFIDENTIAL	CONFIDENTIAL	CONFIDENTIAL
	2021	2022	2023	2024	2025	2026	2027
TripSavers							
Installations	4,700	3,300	1,100	1,300			
CapEx Spend	\$ 41,287,332	\$ 19,531,769	\$ 9,249,261	\$ 13,538,010			

REDACTED
DOCUMENTS BEARING BATES NUMBER 20240025-
OPCROG7-00018109 THROUGH 20240025-
OPCROG7-00018110
ARE REDACTED IN THEIR ENTIRETY

CITIZENS' SEVENTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, LLC (NOS. 144-210)

ROG 7-166 Response

	Actual	Actual	Actual	Actual	Actual	Projected	CONFIDENTIAL	CONFIDENTIAL	CONFIDENTIAL
	2019	2020	2021	2022	2023	2024	Projected	Projected	Projected
Maintenance Programs CapEx Spend							2025	2026	2027
Pole Replacement Program	\$ 32,935,018	\$ 17,075,642	\$ 18,539,932	\$ 22,191,412	\$ 22,030,590	\$ 20,357,057			
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2025 - Project #6	-	December 2025	June 2026	Expected 1Q 2025	3Q 2025		
2026 - Project #1	-	June 2026	June 2026	Expected 1Q 2025	3Q 2025		
2026 - Project #2	-	June 2026	December 2026	Expected 3Q 2025	1Q 2026		
2026 - Project #3	-	June 2026	December 2026	Expected 3Q 2025	1Q 2026		
2026 - Project #4	-	June 2026	June 2027	Expected 1Q 2026	3Q 2026		
2027 - Project #1	-	June 2027	June 2027	Expected 1Q 2026	3Q 2026		
2027 - Project #2	-	June 2027	June 2027	Expected 1Q 2026	3Q 2026		
2027 - Project #3	-	June 2027	December 2027	Expected 3Q 2026	1Q 2027		
2027 - Project #4	-	June 2027	December 2027	Expected 3Q 2026	1Q 2027		

Response:

DEF Generation has been able to maintain and even reduce its operating expenses associated with day-to-day operations of the generation fleet with the implementation of its heat rate efficiency projects. These projects result in more efficient generation units, with increased output and reduced fuel consumption. By operating the more efficient units longer and with greater flexibility DEF is able to reduce the unit load at its less efficient coal units. Through improved unit flexibility, reliability and operations performance, the Company's unit operating costs have not increased, and DEF's Power Generation Organization has absorbed increased labor costs, inflation, and supply chain increases without increasing its base budgets.

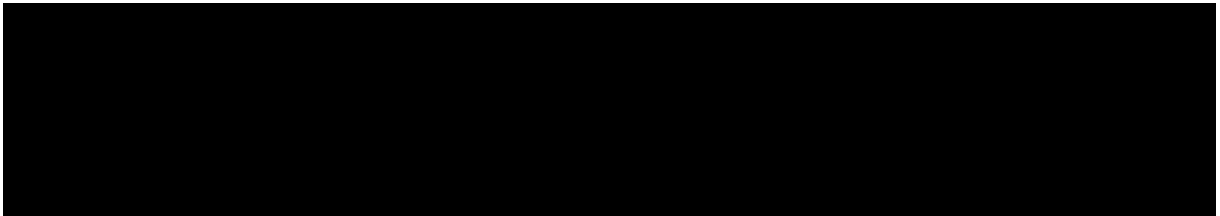
Please reference the attached document bearing Bates numbers 20240025-OPCPOD7-00018059 and those documents provided in response to LULAC POD 1-2.

REDACTED

68. **Customer delivery budgets.** Refer to the testimony of Brian Lloyd, at page 15, lines 11-14. Provide each document containing any analysis the Company has prepared showing the referenced historical trends and forecasted levels.

Response:

Please see attachment bearing Bates numbers 20240025-OPCPOD7-00018061.



of customers and associated volumes of energy produced/required.

REDACTED
DOCUMENTS BEARING BATES NUMBERS
20240025-OPCPOD7-00017308 through 20240025-
OPCPOD7-00017441 and

20240025-OPCROG6-00018088 through 20240025-
OPCROG6-00018097 ARE REDACTED IN THEIR
ENTIRETY

REDACTED
DOCUMENTS BEARING BATES NUMBERS
20240025-OPCPOD7-00017442 through 20240025-
OPCPOD7-00017507 ARE REDACTED IN THEIR
ENTIRETY

REDACTED
DOCUMENTS BEARING BATES NUMBERS
20240025-OPCPOD7-00017583 through 20240025-
OPCPOD7-00017970 ARE REDACTED IN THEIR
ENTIRETY

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
DEF's Response to OPC's Seventh Request for Production of Documents (Nos. 66-77), specifically, Question 66.	Question 66: Documents bearing bates numbers 20240025-OPCPOD7-00017308 through 20240025-OPCPOD7-00017441 are confidential in their entirety.	§366.093(3)(d), F.S. The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.
DEF's Response to OPC's Seventh Request for Production of Documents (Nos. 66-77), specifically, Question 68.	Question 68: The second and third sentences provided in DEF's written response to Question 68 are confidential in their entirety.	§366.093(3)(d), F.S. The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.
DEF's Response to OPC's Seventh Request for Production of Documents (Nos. 66-77), specifically, Question 71.	Question 71: Documents bearing bates numbers 20240025-OPCPOD7-00017442 through 20240025-OPCPOD7-00017582 are confidential in their entirety.	§366.093(3)(d), F.S. The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.
DEF's Response to OPC's Seventh Request for Production of Documents (Nos. 66-77), specifically, Question 72.	Question 72: Documents bearing bates numbers 20240025-OPCPOD7-00017583 through 20240025-OPCPOD7-00017970 are confidential in their entirety.	§366.093(3)(e), F.S. The documents in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.

<p>DEF's Response to OPC's Seventh Set of Interrogatories (Nos. 144-210), specifically, Question 155.</p>	<p>Question 155: The document bearing bates number 20240025-OPCROG7-00018105 is confidential in its entirety.</p>	<p>§366.093(3)(e), F.S. The documents in question contain 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>§366.093(3)(d), F.S. The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p>
<p>DEF's Response to OPC's Seventh Set of Interrogatories (Nos. 144-210), specifically, Question 158.</p>	<p>Question 158: The document bearing bates number 20240025-OPCROG7-00018107 through is confidential in its entirety.</p>	<p>§366.093(3)(e), F.S. The documents in question contain 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>§366.093(3)(d), F.S. The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p>
<p>DEF's Response to OPC's Seventh Set of Interrogatories (Nos. 144-210), specifically, Question 160.</p>	<p>Question 160: Documents bearing bates numbers 20240025-OPCROG7-00018109</p>	<p>§366.093(3)(e), F.S. The documents in question contain confidential information</p>

	<p>through 20240025-OPCPOD7-00018110 are confidential in their entirety.</p>	<p>relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p> <p>§366.093(3)(d), F.S. The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p>
<p>DEF's Response to OPC's Seventh Set of Interrogatories (Nos. 144-210), specifically, Question 166.</p>	<p>Question 166: The document bearing bates number 20240025-OPCROG7-00018112 is confidential in its entirety.</p>	<p>§366.093(3)(e), F.S. The documents in question contain 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>§366.093(3)(d), F.S. The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p>
<p>DEF's Response to OPC's Seventh Set of Interrogatories (Nos. 144-210), specifically, Question 186.</p>	<p>Question 186: The document bearing bates number 20240025-OPCROG7-00018141 is confidential in their entirety.</p>	<p>§366.093(3)(e), F.S. The documents in question contain confidential information relating to competitive business interests, the disclosure of which would impair the</p>

		<p>competitive business of the provider/owner of the information.</p> <p>§366.093(3)(d), F.S. The documents in question contain confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p>
<p>DEF's Response to OPC's Seventh Set of Interrogatories (Nos. 144-210), specifically, Questions 206-208.</p>	<p>Question 206-208: Documents bearing bates numbers 20240025-OPCROG7-00024924 through 20240025-OPCROG7-00024926 are confidential in their entirety.</p>	<p>§366.093(3)(e), F.S. The documents in question contain 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

**AFFIDAVITS OF EDWARD
L. SCOTT, BRIAN M.
LLOYD, JOHN R.
PANIZZA, MARCIA J.
OLIVIER, SHANNON
CALDWELL, AND
VANESSA GOFF**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC
for rate increase

DOCKET NO. 20240025-EI

Dated: May 28, 2024

**AFFIDAVIT OF MARCIA J. OLIVIER 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 Marcia J. Olivier, who being first duly sworn, on oath deposes and says that:

1. My name is Marcia J. Olivier. 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 employed by DEF as the Director of Rates and Regulatory Planning.

3. As Director of Rates and Regulatory Planning, I am responsible for the preparation of jurisdictional separation studies and class cost of service studies, overseeing rate case activities, reporting actual and forecasted earnings and surveillance results, and supporting various regulatory filings and initiatives.

4. DEF is seeking confidential classification for information contained in response to

the Office of the Public Counsel's ("OPC") Seventh Request for Production of Documents, Question 71. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to OPC's Seventh Request for Production of Documents, Question 71, contain confidential information. Specifically, those documents contain pricing information relating to contracts for goods and services. Disclosure of this non-public information could alter contractors' behavior to the detriment of DEF, its customers, and its affiliates. Thus, absent confidential classification, DEF and its affiliates' efforts to contract for goods and services on favorable terms may be impaired.

6. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the ____ day of _____, 2024.

(Signature)
Marcia J. Olivier
Director, Rates and Regulatory Planning
Duke Energy Florida, LLC

Further affiant sayeth not.

Dated the _____ day of _____, 2024.

(Signature)
Marcia J. Olivier
Director, Rates and Regulatory Planning
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 28th day
of May, 2024 by Marcia J. Olivier. She is personally known to me or has produced her

driver's license, or her _____ as identification.

Marcia Olivier

(Signature)

(AFFIX NOTARIAL SEAL)



(Printed Name)
NOTARY PUBLIC, STATE OF _____
Monique Hampton

(Commission Expiration Date)
Monique Hampton

(Serial Number, If Any)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC
for rate increase

DOCKET NO. 20240025-EI

Dated: May 28, 2024

**AFFIDAVIT OF EDWARD L. SCOTT 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 Edward L. Scott, who being first duly sworn, on oath deposes and says that:

1. My name is Edward L. Scott. 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 employed by DE as General Manager of Transmission Planning.

3. As General Manager of Transmission Planning, I am responsible for the planning of Duke Energy's electric transmission system in six states. Areas of focus include development of company Transmission Plans, regional (SERC, RFC, FRCC) and NERC PII as process strategies and assessments, joint studies with adjacent interconnected utilities and RTOs/ISOs and analysis and studies as required under the FERC Open Access Transmission Tariff (OATT). I am

also responsible for ensuring compliance to all safety, environmental and regulatory policies and business practices. I also serve as Vice Chair on the Florida Reliability Coordinating Council's ("FRCC") Operating Committee.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Seventh Request for Production of Documents, Question 72. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to OPC's Seventh Request for Production of Documents, Question 72, contain confidential information. Specifically, those documents contain internal sensitive business information regarding DEF's long-term strategic plans as well as future transmission projects and capital investments. That information relates to DEF's competitive business interests, and, absent confidential classification, its disclosure would impair DEF's ability to compete in the marketplace.

6. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 28th day of May, 2024.

EL Scott

(Signature)

Edward L. Scott
General Manager, Transmission Planning

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 28th day of May, 2024 by Edward L. Scott. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.

Monique West

(Signature)

Monique West

(Printed Name)

NOTARY PUBLIC, STATE OF _____

(AFFIX NOTARIAL SEAL)

(Commission Expiration Date)

(Serial Number, If Any)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC
for rate increase

DOCKET NO. 20240025-EI

Dated: May 28, 2024

**AFFIDAVIT OF SHANNON CALDWELL 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 Shannon Caldwell, who being first duly sworn, on oath deposes and says that:

1. My name is Shannon Caldwell. 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 a Director of Compensation of Duke Energy Business Services LLC. That section provides various administrative and other services to Duke Energy, DEF, and other affiliated companies of Duke Energy Corporation.

3. As the Director of Compensation, I am responsible for broad-based compensation for Duke Energy, including all of Duke Energy's affiliated regulated and non-regulated companies, like DEF. I am responsible for compensation design and strategy, management of key vendor

relationships, compensation administration and compliance.

4. DEF is seeking confidential classification for information contained in documents produced in response to the Office of Public Counsel's ("OPC") Seventh Request for Production of Documents, Question 66. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this information for the reasons set forth below.

5. Documents produced in response to the OPC's Seventh Request for Production of Documents, Question 66, contain internal sensitive business information that relates to internal compensation procedures and incentive plans, the disclosure of which would impair the efforts of DEF to negotiate on favorable terms. Additionally, if the information at issue was disclosed, DEF's efforts to obtain employees at a competitive rate that provides economic value to both DEF and its customers could be compromised. With this non-public information, employers and potential hires could alter their behavior to the detriment of DEF and its customers. Absent confidential classification, competitors would have access to this sensitive business information, which may impair DEF's ability to effectively hire employees at a competitive rate (and, thus, to contract for goods and services on favorable terms).

6. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the ____ day of _____, 2024.

(Signature)
Shannon Caldwell
Director, Compensation
Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this ____ day of _____, 2024 by Shannon Caldwell. She is personally known to me or has produced her _____ driver's license, or her _____ as identification.

(Signature)

(AFFIX NOTARIAL SEAL)

(Printed Name)
NOTARY PUBLIC, STATE OF _____

(Commission Expiration Date)

(Serial Number, If Any)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC
for rate increase

DOCKET NO. 20240025-EI

Dated: May 28, 2024

**AFFIDAVIT OF VANESSA GOFF 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 Vanessa Goff, who being first duly sworn, on oath deposes and says that:

1. My name is Vanessa Goff. 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 employed by Duke Energy Corporation as Director of Renewables Business Development.

3. As Director of Renewables Development, I am responsible for the development of new solar facilities in Florida on behalf of DEF. I lead a team that conducts solar development activities, including project siting, land acquisition, resource assessment, permitting, obtaining interconnection rights, project layout and design, arranging contracts for engineering,

procurement, and construction (“EPC”) services, as well as originating, structuring, and executing transactions to acquire rights to existing solar development projects.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel’s (“OPC”) Seventh Set of Interrogatories, Question 186. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF’s Request and is outlined in DEF’s Confidentiality Justification Matrix that is attached to DEF’s Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to OPC’s Seventh Set of Interrogatories, Question 186, contain confidential information. Specifically, those documents contain pricing information relating to contracts for goods and services. Disclosure of this non-public information could alter contractors’ behavior to the detriment of DEF, its customers, and its affiliates. Thus, absent confidential classification, DEF and its affiliates’ efforts to contract for goods and services on favorable terms may be impaired. In addition, the documents in question contain internal sensitive business information regarding future projects and capital investments. That information relates to DEF’s competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF’s ability to compete in the marketplace.

6. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the _____ day of _____, 2024.

(Signature)
Vanessa Goff
Director, Renewables Business Development
Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this ___ day of _____, 2024 by Vanessa Goff. She is personally known to me or has produced her _____ driver's license, or her _____ as identification.

(Signature)

(AFFIX NOTARIAL SEAL)

(Printed Name)
NOTARY PUBLIC, STATE OF _____

(Commission Expiration Date)

(Serial Number, If Any)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC
for rate increase

DOCKET NO. 20240025-EI

Dated: May 28, 2024

**AFFIDAVIT OF BRIAN M. LLOYD 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 Brian M. Lloyd, who being first duly sworn, on oath deposes and says that:

1. My name is Brian M. Lloyd. 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 employed by DEF as General Manager, Florida Major Projects.

3. As General Manager, my duties and responsibilities include planning for grid upgrades, system planning, and overall Distribution asset management strategy across DEF, as well as the Project Management for executing the work identified. Additionally, I manage organizations that execute the developer interactions and engineer large residential developments across the DEF territory.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Seventh Request for Production of Documents, Question 68, and OPC's Seventh Set of Interrogatories, Questions 155, 158, 160, and 166. A detailed description of the confidential information at issue is contained in Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to OPC's Seventh Request for Production of Documents, Question 68, contain confidential information. Specifically, those documents contain internal sensitive business information that relates to internal compensation procedures and amounts, the disclosure of which would impair the efforts of the Company to negotiate on favorable terms. Additionally, if the information at issue was disclosed, DEF's efforts to obtain employees at a competitive rate that provides economic value to both DEF and its customers could be compromised. With this non-public information, employers and potential hires could alter their behavior to the detriment of DEF and its customers. Absent confidential classification, competitors would have access to this sensitive business information, which may impair DEF's ability to effectively hire employees at a competitive rate (and, thus, to contract for goods and services on favorable terms).

6. Documents produced in response to OPC's Seventh Set of Interrogatories, Questions 155, 158, 160, and 166, contain confidential information. Specifically, those documents contain pricing information relating to contracts for goods and services. Disclosure of this non-public information could alter contractors' behavior to the detriment of DEF, its customers, and its affiliates. Thus, absent confidential classification, DEF and its affiliates' efforts to contract for

goods and services on favorable terms may be impaired. In addition, the documents in question contain internal sensitive business information regarding future projects and capital expenditures. That information relates to DEF's competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF's ability to compete in the marketplace.

7. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the ____ day of _____, 2024.

(Signature)
Brian M. Lloyd
General Manager, Florida Major Projects
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this ___ day of _____, 2024 by Brian M. Lloyd. He is personally known to me or has produced her _____ driver's license, or his _____ as identification.

(Signature)

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF _____

(Commission Expiration Date)

(Serial Number, If Any)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC
for rate increase

DOCKET NO. 20240025-EI

Dated: May 28, 2024

**AFFIDAVIT OF JOHN R. PANIZZA 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 John R. Panizza, who being first duly sworn, on oath deposes and says that:

1. My name is John R. Panizza. 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 employed by Duke Energy Business Services, LLC ("DEBS") as Director, Tax Operations. DEBS provides various administrative and other services to DEF and other affiliated companies of Duke Energy Corporation.

3. As Director, Tax Operations, I have overall responsibility for corporate tax compliance and accounting for Duke Energy and therefore its subsidiary DEF. The Duke Energy Tax Operations Department is responsible for maintaining and reconciling Duke Energy's tax

accounts and for the reporting and disclosure of tax-related matters.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Seventh Set of Interrogatories, Questions 206-208. A detailed description of the confidential information at issue is contained in Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to OPC's Seventh Set of Interrogatories, Questions 206-208, contain confidential information. Specifically, those documents contain internal sensitive business information relating to DEF's actual and estimated property tax rates. That information relates to DEF's competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF's ability to compete in the marketplace.

6. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the ____ day of _____, 2024.

(Signature)

John R. Panizza
Director, Tax Operations
Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this ____ day of _____, 2024 by John R. Panizza. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.

(Signature)

(Printed Name)

NOTARY PUBLIC, STATE OF _____

(AFFIX NOTARIAL SEAL)

(Commission Expiration Date)

(Serial Number, If Any)