



Dianne M. Triplett
DEPUTY GENERAL COUNSEL

June 18, 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 Request for Confidential Classification for certain information provided in its Response to Sierra Club's Fifth Set of Interrogatories (Nos. 98-109). 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 (affidavit of Reginald Anderson)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on May 30, 2024, under separate cover.

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/mh
Attachments

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: June 18, 2024

**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 (“Request”) for certain information contained in its Response to Sierra Club’s Fifth Request for Production of Documents (Nos. 98-109). DEF’s Notice of Intent to Request Confidential Classification was filed May 30, 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 Sierra Club’s Fifth Request for Production of Documents, specifically, Question 101, 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 30, 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 the affidavit of Reginald D. Anderson, 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, the information at issue in DEF’s response to Sierra Club’s Fifth Request for Production of Documents, Question 101, includes detailed information about the location and nature of DEF’s transmission system. Disclosure of that information could pose significant security risks to DEF, its customers, and the grid. In addition, these documents contain information relating to DEF’s generation units, as well as DEF’s costs associated with these units. That information relates to DEF’s competitive business interests, and, thus, its disclosure would impair DEF’s ability to compete in the marketplace.

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 18th of June, 2024.

/s/Dianne M. Triplett

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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 18th day of June, 2024.

/s/ Dianne M. Triplett
Attorney

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Exhibit A

“CONFIDENTIAL”

(filed under separate cover on May 30, 2024)

Exhibit B

REDACTED

(copy-one)

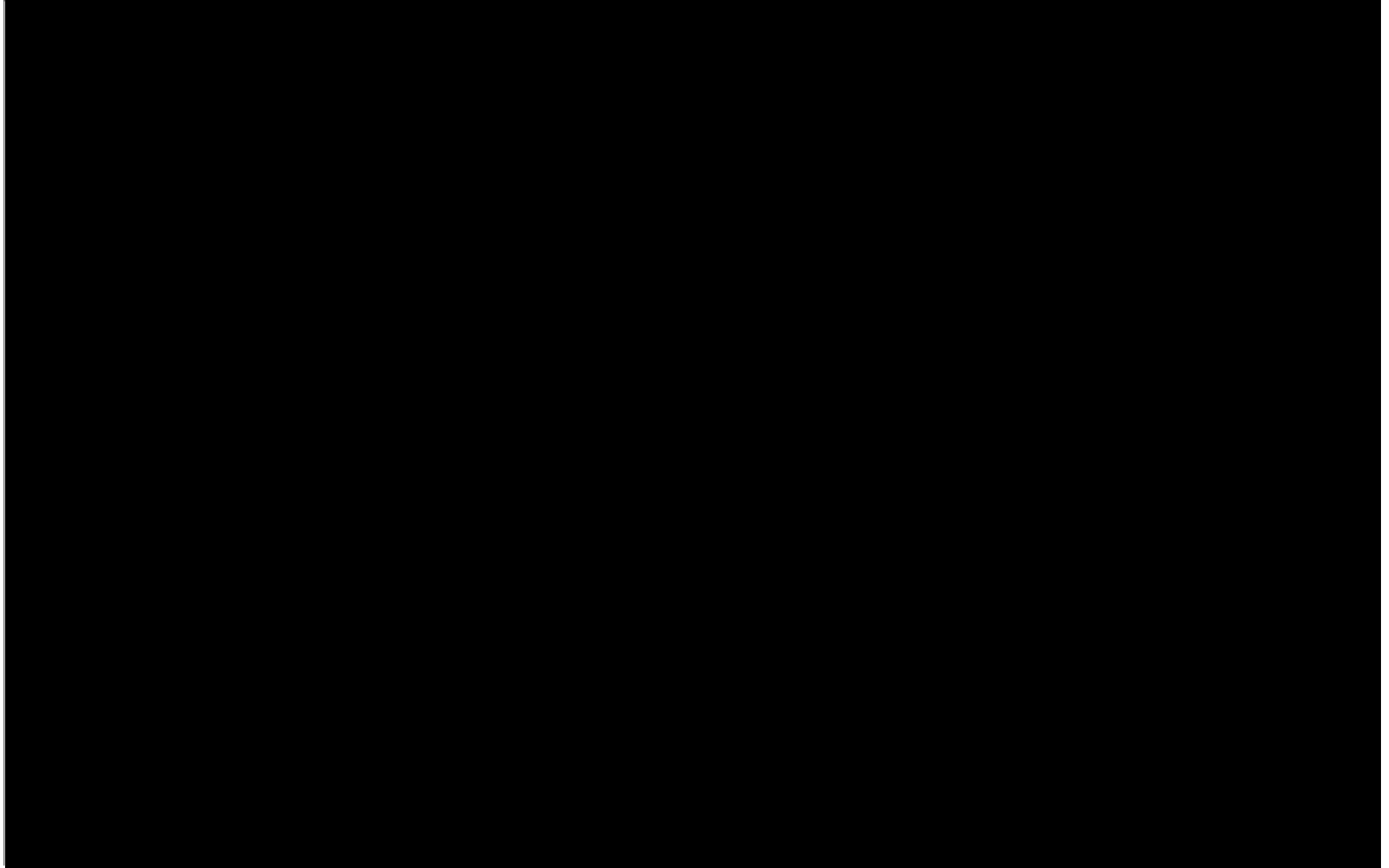
Duke Energy Florida, LLC

REDACTED

Sierra Club Rate Case ROG 5-101b(i&ii)

System Unit Constraints including Crystal River Units 4 & 5 for the period May 1, 2024 through May 8, 2024

Unit	Unit Type	Fuel Type	Dual Fuel Type	Setup	Var. O&M (\$/H)	Var. O&M (\$/MWH)	Fuel Cost (\$/MBTU)	Dual Fuel Cost (\$/MBTU)	MW	Min Load (MW)	Max Load (MW)	Run Time (Hours)	Avg Heat Rate (MBTU/MWH)	Avg Energy Cost (\$/MWH) (Decommit)	Avg Energy Cost (\$/MWH) (Commit)	Incremental Cost @ Min (\$/MWH)	Incremental Cost (\$/MWH)
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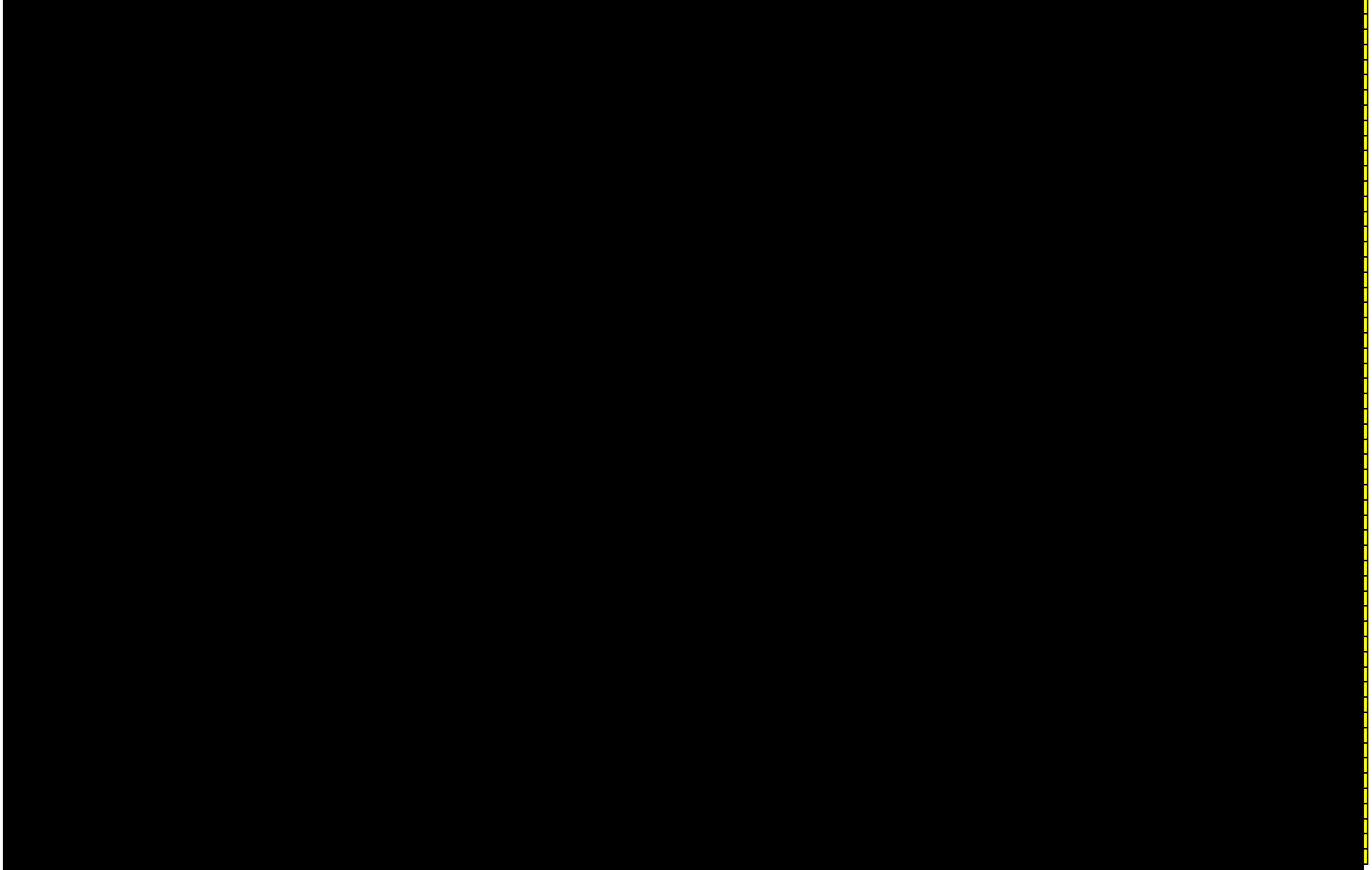
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Duke Energy Florida, LLC

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Sierra Club Rate Case ROG 5-101b(i&ii)

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[REDACTED]																	

Duke Energy Florida, LLC
Sierra Club Rate Case ROG 5-101b(iii)
System Unit Constraints including Crystal River Units 4 & 5 for the period May 1, 2024 through May 8, 2024

CONFIDENTIAL

Station	Unit	Unit Type	Status	Constraint	Seas Min	Seas Max	Eff MW	Start Date	Start time	End Date	End time	Reason
[Redacted Content]												

Duke Energy Florida, LLC
Sierra Club Rate Case ROG 5-101b(iii)
System Unit Constraints including Crystal River Units 4 & 5 for the period May 1, 2024 through May 8, 2024

CONFIDENTIAL

Station	Unit	Unit Type	Status	Constraint	Seas Min	Seas Max	Eff MW	Start Date	Start time	End Date	End time	Reason
[Redacted Content]												

Duke Energy Florida, LLC

CONFIDENTIAL

Sierra Club Rate Case ROG 5-101b(iii)

System Unit Constraints including Crystal River Units 4 & 5 for the period May 1, 2024 through May 8, 2024

Station	Unit	Unit Type	Status	Constraint	Seas Min	Seas Max	Eff MW	Start Date	Start time	End Date	End time	Reason
[Redacted Content]												

Exhibit B

REDACTED

(copy-two)

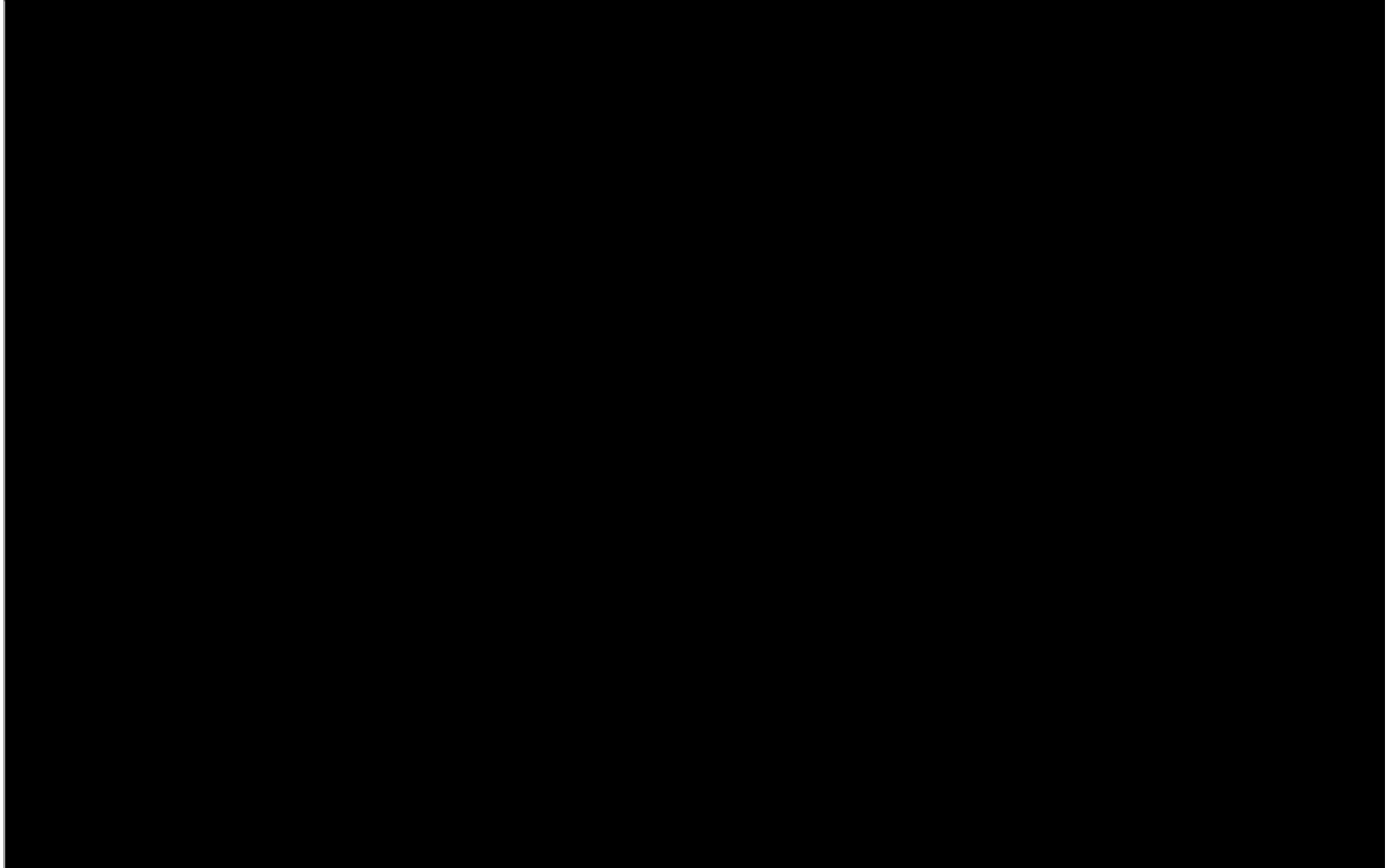
Duke Energy Florida, LLC

REDACTED

Sierra Club Rate Case ROG 5-101b(i&ii)

System Unit Constraints including Crystal River Units 4 & 5 for the period May 1, 2024 through May 8, 2024

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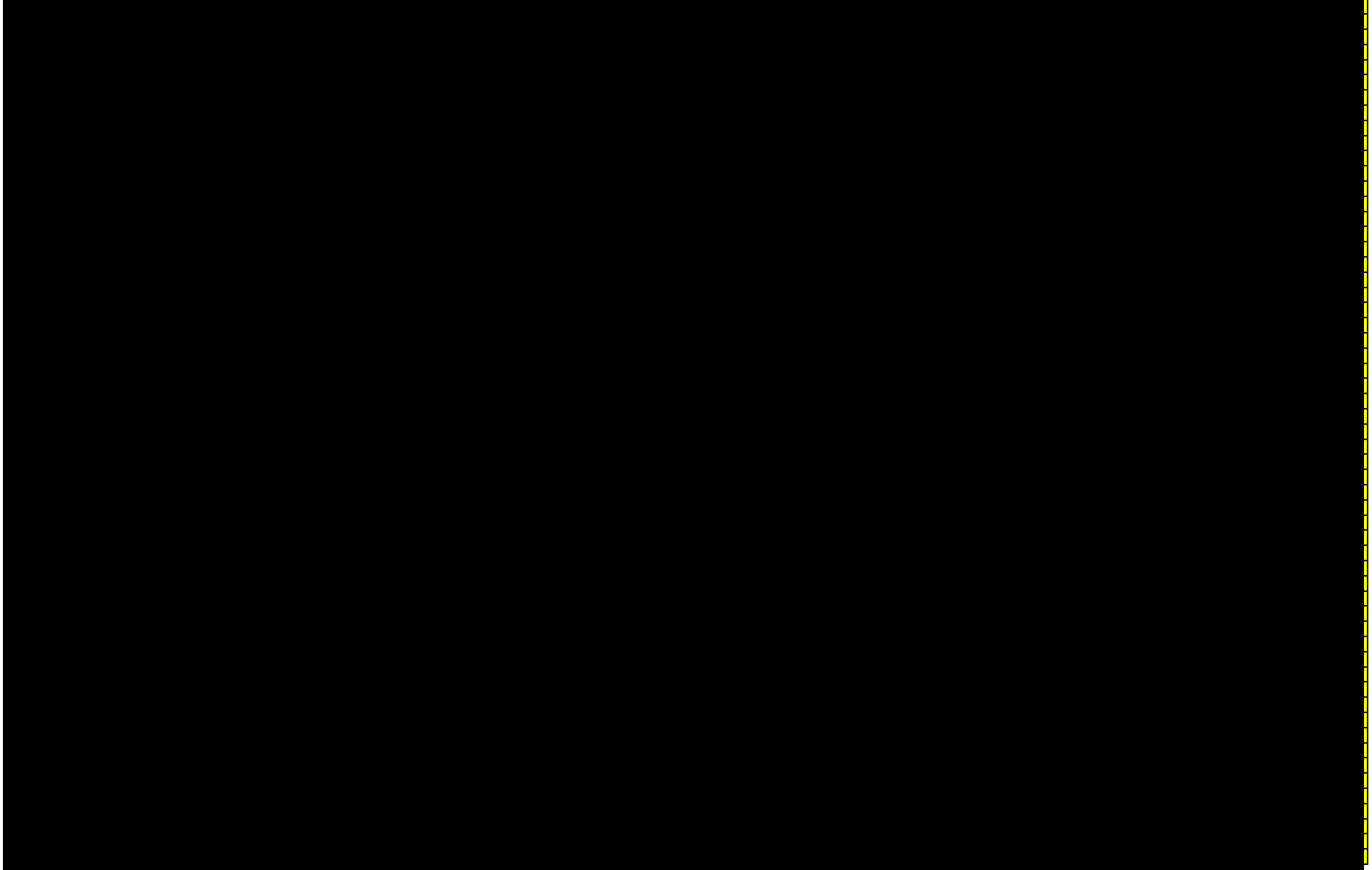
Duke Energy Florida, LLC

REDACTED

Sierra Club Rate Case ROG 5-101b(i&ii)

System Unit Constraints including Crystal River Units 4 & 5 for the period May 1, 2024 through May 8, 2024

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Duke Energy Florida, LLC

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Sierra Club Rate Case ROG 5-101b(i&ii)

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[REDACTED]																	

Duke Energy Florida, LLC
Sierra Club Rate Case ROG 5-101b(iii)
System Unit Constraints including Crystal River Units 4 & 5 for the period May 1, 2024 through May 8, 2024

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Duke Energy Florida, LLC
Sierra Club Rate Case ROG 5-101b(iii)
System Unit Constraints including Crystal River Units 4 & 5 for the period May 1, 2024 through May 8, 2024

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[Redacted Content]												

Duke Energy Florida, LLC

CONFIDENTIAL

Sierra Club Rate Case ROG 5-101b(iii)

System Unit Constraints including Crystal River Units 4 & 5 for the period May 1, 2024 through May 8, 2024

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[Redacted Content]												

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
DEF's Response to Sierra Club's Fifth Set of Interrogatories (Nos. 98-109), Question 101.	Question 101: Documents bearing bates numbers 20240025-SierraClubROG5-00000495 through 20240025-SierraClubROG5-00000500 all information beneath the headers is confidential in its entirety.	§366.093(3)(c), F.S. The documents in question contain confidential security measures, systems, or procedures. §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.

Exhibit D

AFFIDAVIT OF REGINALD D. ANDERSON

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: June 18, 2024

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

1. My name is Reginald D. 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 employed by DEF as Vice President, Power Generation.

3. As Vice President of DEF's Power Generation organization, I am responsible for providing overall leadership and strategic and tactical planning over employees in DEF's Power Generation organization. In this role, I oversee generation projects, major maintenance programs, outage and project management, fleet retirement strategy, and workforce planning (including

departmental staffing and long-term strategies such as organizational alignment, design, retention, and inclusion). I am responsible for billions of dollars in assets including capital and operating and maintenance budgets, and I lead the development of regional succession planning.

4. DEF is seeking confidential classification for information contained in response to the Sierra Club's Fifth Set of Interrogatories, Question 101. 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 Sierra Club's Fifth Set of Interrogatories, Question 101, contain confidential information. Specifically, these documents contain detailed information about the location and nature of DEF's transmission system. Disclosure of that information could pose significant security risks to DEF, its customers, and the grid. In addition, these documents contain information relating to DEF's generation units, as well as DEF's costs associated with these units. That information relates to DEF's competitive business interests, and, thus, 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.

Dated the 17th day of June 2024.



(Signature)
Reginald D. Anderson
Vice President, Power Generation
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 17th day of June 2024 by Reginald D. Anderson. He is personally known to me or has produced his n/a driver's license, or his n/a as identification.


(Signature)

NATALIA RUTHERFORD
(Printed Name)

NOTARY PUBLIC, STATE OF Florida

8/3/2026
(Commission Expiration Date)

HH 296777
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

