



Dianne M. Triplett  
DEPUTY GENERAL COUNSEL

June 24, 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 LULAC and FL Rising's Sixth Request for Production of Documents (No. 44). 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 Lesley Quick)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on June 4, 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 24, 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 DEF’s Response to Florida Rising and League of United Latin American Citizens’ (together, “LULAC”) Sixth Request for Production of Documents (No. 44).

DEF’s Notice of Intent to Request Confidential Classification was filed June 4, 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 LULAC’s Sixth Request for Production of Documents, Question 44, 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 June 4, 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 Lesley G. Quick, 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 LULAC’s Sixth Request for Production of Documents, Question 44, includes pricing information relating to contracts for goods and services (along with other terms of such contracts). 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’s 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 DEF’s costs associated with customer disconnections. 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.

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 24th day 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 24th day of June, 2024.

/s/ Dianne M. Triplett  
Attorney

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# **Exhibit A**

**“CONFIDENTIAL”**

**(filed under separate cover on June 4, 2024)**

# **Exhibit B**

**REDACTED**

**(copy-one)**

Duke Energy Florida  
LULAC FL Rising ROG 6-102  
Docket No. 20240025 - EI

Question Detail: 6-102. Please indicate the annual cost of disconnections to the utility (both gross and net of corresponding fees collected from disconnected customers).

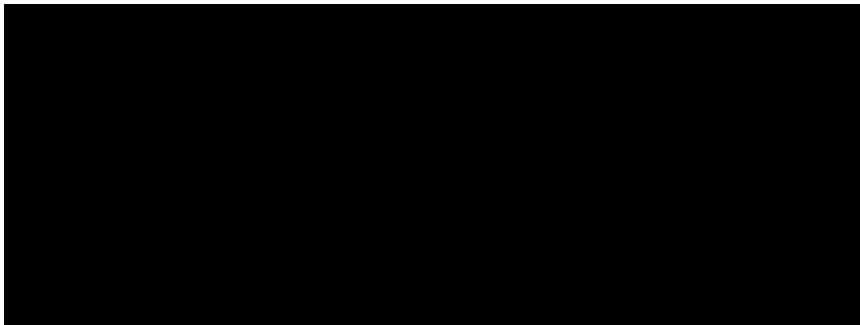
**RESPONSE:**

2023 Estimated Cost to DNP

Est. Cost to disconnect	\$2,670,514
Reconnect fees	\$2,667,807
Difference	\$2,707

2023 annual cost to disconnect includes; text & call campaigns, incoming customer phone calls, Accounts Receivable back office work, truck rolls (if needed), and technology.

	2023 final notice text	final notice	day of call text	day of call	CCO phone call	AR backoffice	truck roll	AMI		
res		\$771	\$1,020	\$1,961	\$1,425	\$1,158,448	\$1,387,774	\$118,755	\$723	\$2,670,106
nonres				\$408						\$408
										<u>\$2,670,514</u>





# **Exhibit B**

**REDACTED**

**(copy-two)**

Duke Energy Florida  
LULAC FL Rising ROG 6-102  
Docket No. 20240025 - EI

Question Detail: 6-102. Please indicate the annual cost of disconnections to the utility (both gross and net of corresponding fees collected from disconnected customers).

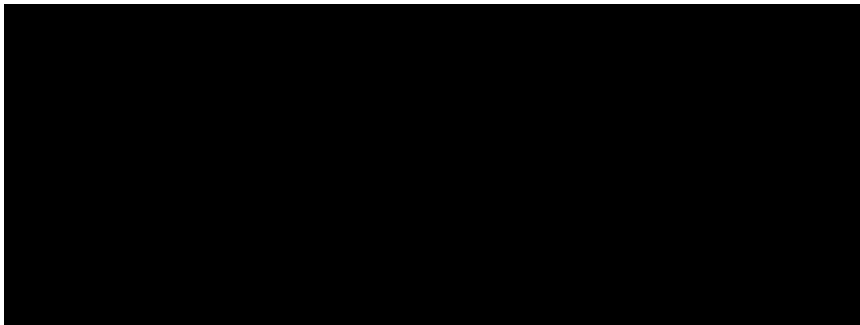
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nonres				\$408						\$408
										<u>\$2,670,514</u>



# Exhibit C

## DUKE ENERGY FLORIDA Confidentiality Justification Matrix

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
<p>DEF's Response to LULAC's Sixth Request for Production of Documents (No. 44).</p>	<p><b>Question 44:</b> The document bearing bates number 20240025-LULACFLRISINGPOD6-00009617 contains confidential information. Specifically, all text below the number "\$2,670,514" is confidential.</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>§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>

# **Exhibit D**

## **AFFIDAVIT OF LESLEY G. QUICK**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20240025-EI

Dated: June 24, 2024

**AFFIDAVIT OF LESLEY G. QUICK 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 Lesley G. Quick, who being first duly sworn, on oath deposes and says that:

1. My name is Lesley G. Quick. 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 Vice President of Customer Advocacy, Regulatory Engagement and Support within Customer Services for Duke Energy Corporation, including Duke Energy Florida ("DEF" or the "Company").

3. My responsibilities as Vice President, Customer Advocacy include the oversight, leadership, integration, and implementation of strategic business planning governance, change management, audit and compliance requirements, customer technology support, digital experience

transformation, and enhanced customer communications. I provide direction and leadership in the development of organizational business plans to ensure alignment and achievement of objectives, regulatory compliance and reporting, key performance indicators, and operational metrics. Additionally, I lead the Customer Advocacy division. Customer Advocacy is responsible for enhancing support for our customers by expanding outreach with local, state, and federal agency partners to improve access to assistance funding.

4. DEF is seeking confidential classification for information contained in response to Florida Rising and League of United Latin American Citizens' (together, "LULAC") Sixth Request for Production of Documents, Question 44. 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 LULAC's Sixth Request for Production of Documents, Question 44, contain confidential information. Specifically, these documents contain pricing information relating to contracts for goods and services (along with other terms of such contracts). 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's 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 DEF's costs associated with customer disconnections. 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.

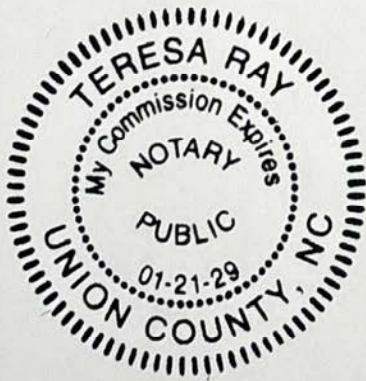
Dated the 19<sup>th</sup> day of June, 2024.

\_\_\_\_\_  
(Signature)  
Lesley G. Quick  
Vice President, Customer Advocacy  
Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 19<sup>th</sup> day of June, 2024 by Lesley G. Quick. She is personally known to me or has produced her \_\_\_\_\_ driver's license, or her \_\_\_\_\_ as identification.

Teresa Ray  
(Signature)  
Teresa Ray  
(Printed Name)  
NOTARY PUBLIC, STATE OF NC  
01/21/29  
(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)



\_\_\_\_\_  
(Serial Number, If Any)