



Dianne M. Triplett
DEPUTY GENERAL COUNSEL

July 1, 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's ("DEF") Request for Confidential Classification for certain information provided in its Supplemental Response to OPC's Eighth Set of Interrogatories (Nos. 211-221). 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 Rebekah Buck)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on June 14, 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: July 1, 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 Supplemental Response to OPC’s Eighth Set of Interrogatories (Nos. 211-221). DEF’s Notice of Intent to Request Confidential Classification was filed June 14, 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 supplemental response to OPC’s Eighth Set of Interrogatories, specifically, Question 211, contains “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 14, 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 affidavit of Rebekah E. Buck, 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 supplemental response to OPC’s Eighth Set of Interrogatories, Question 211, includes basis data calculations underlying costs allocated to DEF by its affiliates (and from DEF to its affiliates). This information is proprietary, internal sensitive business information. Thus, it 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 1st of July, 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 1st day of July, 2024.

/s/ Dianne M. Triplett
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Exhibit A

“CONFIDENTIAL”

(filed under separate cover on June 14, 2024)

Exhibit B

REDACTED

(copy-one)

REDACTED

**DOCUMENTS BEARING BATES NUMBERS
20240025-OPCROG8-00031388 through 20240025-
OPCROG8-00031449 IS REDACTED IN ITS
ENTIRETY**

Exhibit B

REDACTED

(copy-two)

REDACTED

DOCUMENTS BEARING BATES NUMBERS
20240025-OPCROG8-00031388 through 20240025-
OPCROG8-00031449 IS REDACTED IN ITS
ENTIRETY

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
DEF's Supplemental Response to OPC's Eighth Set of Interrogatories (Nos. 211-221), specifically, Question 211.	Question 211: Documents bearing bates numbers 20240025-OPCROG8-00031388 through 20240025-OPCROG8-00031449 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.

Exhibit D

AFFIDAVIT OF REBEKAH E. BUCK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: June 3, 2024

**AFFIDAVIT OF REBEKAH E. BUCK 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 Rebekah E. Buck, who being first duly sworn, on oath deposes and says that:

1. My name is Rebekah E. Buck. 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 of Allocations and Reporting. DEBS provides various administrative and other services to DEF.

3. As Director of Allocations and Reporting, I am responsible for various accounting activities, including the cost allocation processes for service company costs utilized for Duke

Energy Corporation and its affiliates (like DEF).

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Eighth Set of Interrogatories, Question 211. 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.

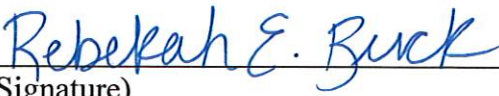
5. Documents produced in response to OPC's Eighth Set of Interrogatories, Question 211, contain basis data calculations underlying costs allocated to or from DEF via its affiliates. This information is internal, proprietary business information. Thus, it relates to DEF's competitive business interests, 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.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 5th day of June, 2024.



(Signature)
Rebekah E. Buck
Director, Allocations and Reporting
Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 5th day of June, 2024 by Rebekah E. Buck. 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)

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

