



Dianne M. Triplett
DEPUTY GENERAL COUNSEL

July 3, 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 Staff's Sixth Set of Interrogatories (Nos. 55-73). 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 of Vanessa Goff, Hans Jacob, Brian Lloyd, James McClay)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on June 13, 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 3, 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 the Staff of the Florida Public Service Commission’s (“Staff”) Sixth Set of Interrogatories (Nos. 55-73). DEF’s Notice of Intent to Request Confidential Classification was filed June 13, 2024. This Request is timely. *See* Rule 25-22.006(3)(a)1, F.A.C. In support of this Request, DEF states:

1. Documents responsive to Staff’s Sixth Set of Interrogatories, Questions 60, 61, 65, and 67, 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 13, 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 affidavits of Vanessa Goff, Hans Jacob, Brian M. Lloyd, and James J. McClay, III, 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 Staff’s Sixth Set of Interrogatories, Question 60, includes internal sensitive business information regarding DEF’s distribution projects, to include its labor and other costs as well as its cost projections. 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 response to Staff’s Sixth Set of Interrogatories, Question 61, includes bid and pricing data for battery storage projects, as well as other information relating to DEF’s process for requesting and selecting proposals. 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 response to Staff’s Sixth Set of

Interrogatories, Question 65, includes internal sensitive business information regarding DEF's solar project costs (as well as cost projections). 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 response to Staff's Sixth Set of Interrogatories, Question 67, includes internal sensitive business information regarding DEF's asset optimization strategy, as well as its actual and projected savings in relation to its asset optimization activity. 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 Florida Public Service Commission to conduct its business.

WHEREFORE, for the foregoing reasons, DEF respectfully requests that this Request be

granted.

RESPECTFULLY SUBMITTED this 3rd day of July, 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 3rd day of July, 2024.

/s/ Dianne M. Triplett
Attorney

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
MThompso@psc.state.fl.us
SStiller@psc.state.fl.us
discovery-gcl@psc.state.fl.us

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

Tony Mendoza / Patrick Woolsey
Sierra Club
2101 Webster Street Suite 1300
Oakland, CA 94612
tony.mendoza@sierraclub.org
patrick.woolsey@sierraclub.org

Sari Amiel
Sierra Club
50 F St. NW, Eighth Floor
Washington, DC 20001
sari.amiel@sierraclub.org

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

Bradley Marshall / Jordan Luebkekmann /
Hema Lochan
Earthjustice
LULAC & FL Rising
111 S. Martin Luther King Jr. Blvd.
Tallahassee, Florida 32301
bmarshall@earthjustice.org
jluebkekmann@earthjustice.org
hlochan@earthjustice.org
flcaseupdates@earthjustice.org

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

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

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

William C. Garner
Law Office of William C. Garner, PLLC
SACE
3425 Bannerman Road
Unit 105, No. 414
Tallahassee, FL 32312
bgarner@wcglawoffice.com

Nikhil Vijaykar
Keyes & Fox LLP
EVgo Services, LLC
580 California St., 12th Floor
San Francisco, CA 94104
nvijaykar@keyesfox.com

Lindsey Stegall
EVgo Services, LLC
11835 W. Olympic Blvd., Ste. 900E
Los Angeles, CA 90064
Lindsey.Stegall@evgo.com

Frederick L. Aschauer, Jr., Esq.
Allan J. Charles, Esq.
Lori Killinger, Esq.
Lewis, Longman & Walker P.A.
AAACE / Circle K / RaceTrac / Wawa
106 East College Avenue, Suite 1500
Tallahassee, Florida 32301
fAschauer@llw-law.com
acharles@llw-law.com
killinger@llw-law.com
jmelchior@llw-law.com

Exhibit A

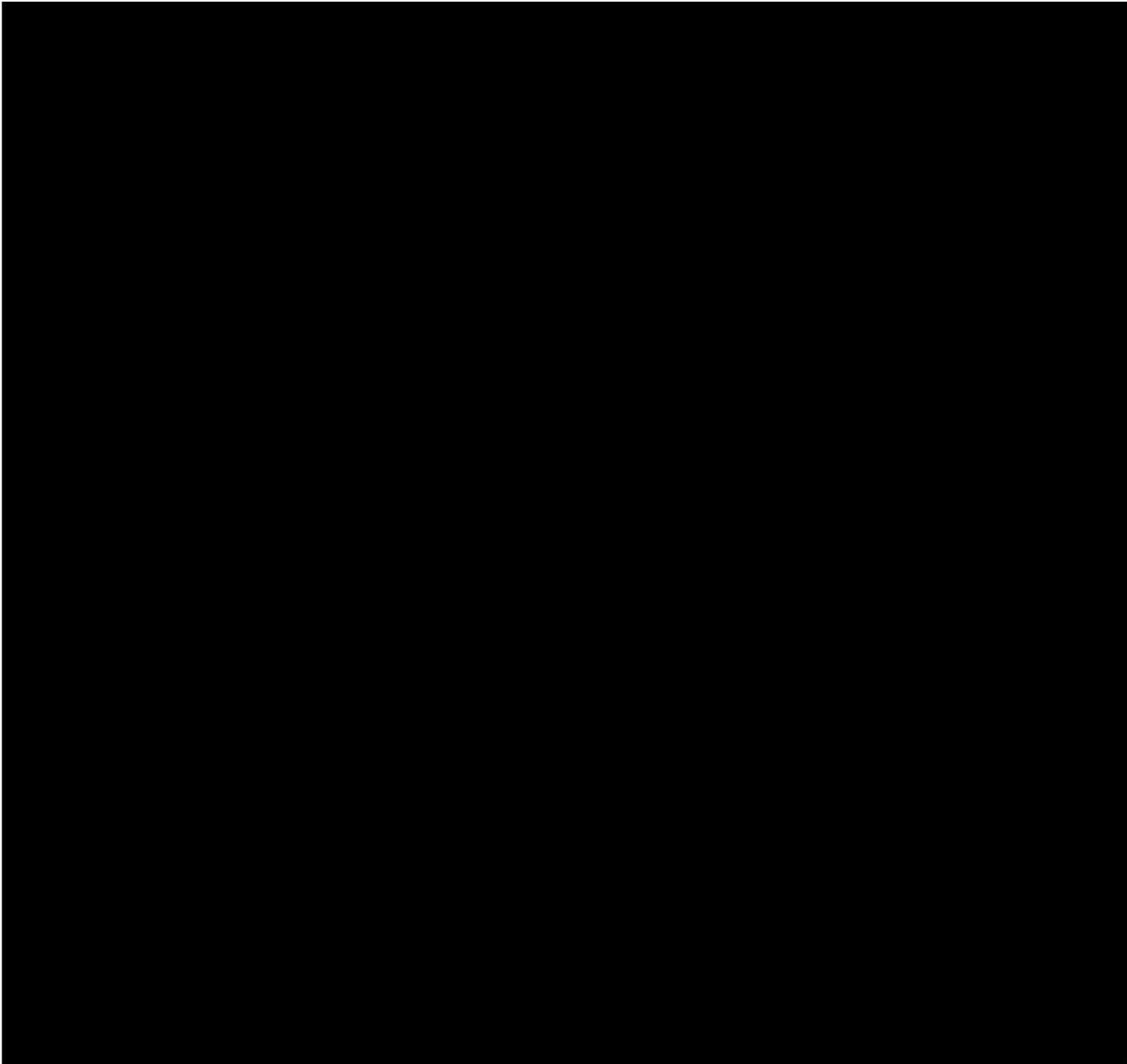
“CONFIDENTIAL”

(filed under separate cover on June 13, 2024)

Exhibit B

REDACTED

(copy-one)



REDACTED

DOCUMENTS BEARING BATES NUMBERS 20240025-
STAFFROG6-00001095 THROUGH 20240025-STAFFROG6-
00001128 ARE REDACTED IN THEIR ENTIRETY

REDACTED

2025 Solar	Named Project	Filing In Service Date	Planned In Service Date	Permitting Status	Planned Construction Start	Filed Project Cost	Anticipated Project Cost	CEC Project
2025 - Project #1	Sundance	March 2025	March 2025	Complete	Began May 2025	[REDACTED]	[REDACTED]	Yes
2025 - Project #2	Rattler	March 2025	December 2025	Expected 3Q 2024	1Q 2025			Yes
2025 - Project #3	Half Moon	December 2025	January 2026	Expected 3Q 2024	1Q 2025			Yes
2025 - Project #4	Bailey Mill	December 2025	January 2026	Expected 3Q 2024	1Q 2025			Yes
2025 - Project #5	-	December 2025	June 2026	Expected 1Q 2025	3Q 2025			Yes
2025 - Project #6	-	December 2025	June 2026	Expected 1Q 2025	3Q 2025			No
2026 - Project #1	-	June 2026	June 2026	Expected 1Q 2025	3Q 2025			No
2026 - Project #2	-	June 2026	December 2026	Expected 3Q 2025	1Q 2026			No
2026 - Project #3	-	June 2026	December 2026	Expected 3Q 2025	1Q 2026			No
2026 - Project #4	-	June 2026	June 2027	Expected 1Q 2026	3Q 2026			No
2027 - Project #1	-	June 2027	June 2027	Expected 1Q 2026	3Q 2026			No
2027 - Project #2	-	June 2027	June 2027	Expected 1Q 2026	3Q 2026			No
2027 - Project #3	-	June 2027	December 2027	Expected 3Q 2026	1Q 2027			No
2027 - Project #4	-	June 2027	December 2027	Expected 3Q 2026	1Q 2027			No

Duke Energy Florida, LLC
Staff ROG 6-67(c) DEF Asset Optimization Summary

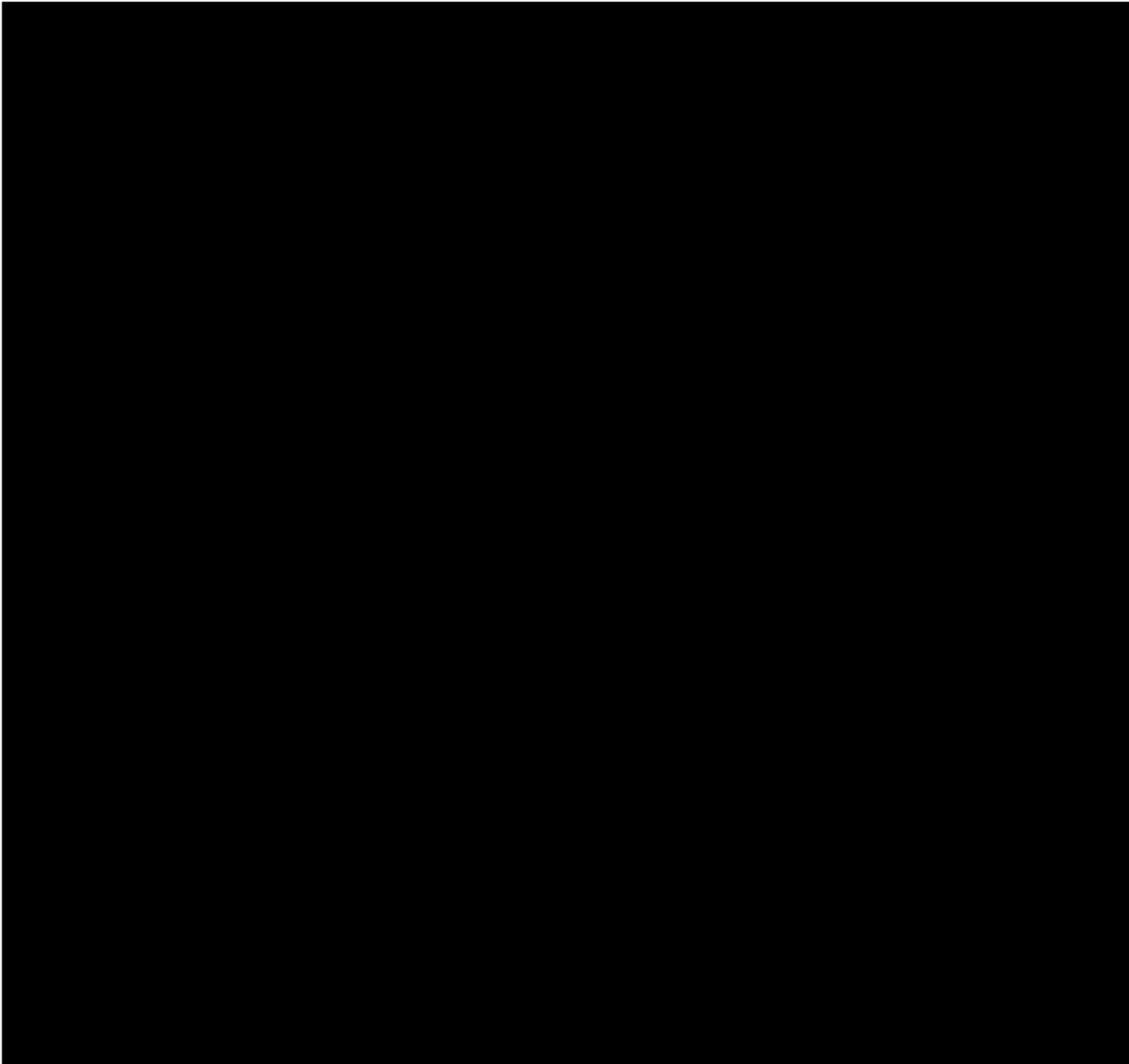
Description	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024 *	2025 (projected)	2026 (projected)	2027 (projected)	2028 (projected)	2029 (projected)	2030-2040 (projected)	Total
Gas storage utilization																NA	NA	NA	NA	NA	NA	
Delivered gas sales using existing transport																NA	NA	NA	NA	NA	NA	
Production (upstream) area sales																NA	NA	NA	NA	NA	NA	
Capacity release of gas transport	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$104,500	\$0	\$0	\$37,500	\$325,750	\$835,000	\$273,750	NA	NA	NA	NA	NA	NA	\$1,576,500
Asset Management Agreement																NA	NA	NA	NA	NA	NA	
Coal Transportation Savings																NA	NA	NA	NA	NA	NA	
Sales of Renewable Energy Credits **	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	(\$78,320)	\$113,020	NA	NA	NA	NA	NA	NA	\$34,701
Fuel Purchase Savings (A9)	\$24,498,302	\$16,135,504	(\$1,840,426)	\$1,274,325	\$2,201,980	(\$1,435,753)	\$1,314,457	\$2,811,900	\$6,196,147	\$2,068,894	\$1,119,366	\$7,393,890	\$7,684,738	\$4,948,608	\$1,035,841	\$969,115	\$1,441,849	\$2,177,672	\$2,497,088	\$2,523,311	NA	\$85,016,808
Economy Sales (A6)	\$1,116,387	\$352,650	\$298,813	\$427,107	\$4,493,609	\$3,720,655	\$843,842	\$887,371	\$2,269,917	\$1,649,135	\$1,223,710	\$2,855,389	\$5,458,082	\$3,105,955	\$4,220,957	\$5,027,946	\$5,158,106	\$5,115,305	\$5,300,196	\$5,404,572	NA	\$58,929,704
Total	\$25,614,690	\$21,469,855	\$5,021,398	\$7,473,207	\$9,266,541	\$4,737,356	\$3,147,300	\$4,789,414	\$10,433,077	\$6,511,002	\$5,937,769	\$14,293,066	\$19,503,896	\$18,422,616	\$11,652,813	\$5,997,061	\$6,599,955	\$7,292,977	\$7,797,284	\$7,927,883	NA	\$203,889,160

Note
 * For 2024, capacity release of gas transport, asset management agreement and coal transportation savings reflect executed activities for calendar year 2024. DEF does not forecast these activities, nor does it forecast gas storage utilization, delivered gas sales using existing transport, or production area sales. The fuel purchase savings and economy sales are projections for 2024 - 2029. DEF does not have projections beyond 2029.
 ** DEF's CEI Program is in its early stages as it was only implemented 10 months ago. Projections are not provided beyond the current year while DEF is continuing to work with, and educate, customers about the program. This will ultimately assist DEF in making the program more successful and its sales projections more accurate.

Exhibit B

REDACTED

(copy-two)



REDACTED

**DOCUMENTS BEARING BATES NUMBERS 20240025-
STAFFROG6-00001095 THROUGH 20240025-STAFFROG6-
00001128 ARE REDACTED IN THEIR ENTIRETY**

Duke Energy Florida, LLC
Staff ROG 6-67(c) DEF Asset Optimization Summary

Description	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024 *	2025 (projected)	2026 (projected)	2027 (projected)	2028 (projected)	2029 (projected)	2030-2040 (projected)	Total
Gas storage utilization																NA	NA	NA	NA	NA	NA	
Delivered gas sales using existing transport																NA	NA	NA	NA	NA	NA	
Production (upstream) area sales																NA	NA	NA	NA	NA	NA	
Capacity release of gas transport	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$104,500	\$0	\$0	\$37,500	\$325,750	\$835,000	\$273,750	NA	NA	NA	NA	NA	NA	\$1,576,500
Asset Management Agreement																NA	NA	NA	NA	NA	NA	
Coal Transportation Savings																NA	NA	NA	NA	NA	NA	
Sales of Renewable Energy Credits **	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	(\$78,320)	\$113,020	NA	NA	NA	NA	NA	NA	\$34,701
Fuel Purchase Savings (A9)	\$24,498,302	\$16,135,504	(\$1,840,426)	\$1,274,325	\$2,201,980	(\$1,435,753)	\$1,314,457	\$2,811,900	\$6,196,147	\$2,068,894	\$1,119,366	\$7,393,890	\$7,684,738	\$4,948,608	\$1,035,841	\$969,115	\$1,441,849	\$2,177,672	\$2,497,088	\$2,523,311	NA	\$85,016,808
Economy Sales (A6)	\$1,116,387	\$352,650	\$298,813	\$427,107	\$4,493,609	\$3,720,655	\$843,842	\$887,371	\$2,269,917	\$1,649,135	\$1,223,710	\$2,855,389	\$5,458,082	\$3,105,955	\$4,220,957	\$5,027,946	\$5,158,106	\$5,115,305	\$5,300,196	\$5,404,572	NA	\$58,929,704
Total	\$25,614,690	\$21,469,855	\$5,021,398	\$7,473,207	\$9,266,541	\$4,737,356	\$3,147,300	\$4,789,414	\$10,433,077	\$6,511,002	\$5,937,769	\$14,293,066	\$19,503,896	\$18,422,616	\$11,652,813	\$5,997,061	\$6,599,955	\$7,292,977	\$7,797,284	\$7,927,883	NA	\$203,889,160

Note
 * For 2024, capacity release of gas transport, asset management agreement and coal transportation savings reflect executed activities for calendar year 2024. DEF does not forecast these activities, nor does it forecast gas storage utilization, delivered gas sales using existing transport, or production area sales. The fuel purchase savings and economy sales are projections for 2024 - 2029. DEF does not have projections beyond 2029.
 ** DEF's CEI Program is in its early stages as it was only implemented 10 months ago. Projections are not provided beyond the current year while DEF is continuing to work with, and educate, customers about the program. This will ultimately assist DEF in making the program more successful and its sales projections more accurate.

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
DEF's Response to Staff's Sixth Set of Interrogatories (Nos. 55-73), specifically, Question 60.	Question 60: Document bearing bates number 20240025-STAFFROG6-00001094 is confidential in its entirety.	§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.
DEF's Response to Staff's Sixth Set of Interrogatories (Nos. 55-73), specifically, Question 61.	Question 61: Documents bearing bates numbers 20240025-STAFFROG6-00001095 through 20240025-STAFFROG5-00001128 are confidential in their entirety.	§366.093(3)(d), F.S. The documents in question contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of DEF or its affiliates to contract for goods or services on favorable terms.
DEF's Response to Staff's Sixth Set of Interrogatories (Nos. 55-73), specifically, Question 65.	Question 65: Document bearing bates number 20240025-STAFFROG6-00001403-all information in columns titled "File Project Cost " and "Anticipated Project Cost" is confidential.	§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.
DEF's Response to Staff's Sixth Set of Interrogatories (Nos. 55-73), specifically, Question 67.	Question 67: Document bearing bates number 20240025-STAFFROG6-00001428 all information in rows titled "Gas storage Utilization", Delivered gas sales using	§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

	existing transport”, “Asset Management Agreement” and “Coal Transportation Savings” for columns “2010 through 2024 and Total” is confidential.	competitive business of the provider/owner of the information.
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Exhibit D

AFFIDAVITS OF VANESSA GOFF, HANS JACOB, BRIAN M. LLOYD, AND JAMES J. MCCLAY, III

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: July 3, 2024

**AFFIDAVIT OF VANESSA GOFF IN SUPPORT OF
DUKE ENERGY FLORIDA, LLC'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF _____

COUNTY OF _____

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 Staff of the Florida Public Service Commission’s (“Staff”) Sixth Set of Interrogatories, Question 65. 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 Staff’s Sixth Set of Interrogatories, Question 65, contain confidential information. Specifically, those documents contain internal sensitive business information regarding DEF’s solar project costs (as well as cost projections). 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.

(AFFIX NOTARIAL SEAL)

(Signature)

(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: July 3, 2024

**AFFIDAVIT OF HANS JACOB 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 Hans Jacob, who being first duly sworn, on oath deposes and says that:

1. My name is Hans Jacob. 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 Renewable Business Development.

3. As a Director of Renewable Business Development, I am responsible for the development of battery energy storage systems ("BESS") projects in Florida on behalf of DEF. I lead a team of project developers responsible for the initiation and deployment of regulated battery

energy storage and microgrid systems.

4. DEF is seeking confidential classification for information contained in response to the Staff of the Florida Public Service Commission's ("Staff") Sixth Set of Interrogatories, Question 61. 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 Staff's Sixth Set of Interrogatories, Question 61, contain confidential information. Specifically, these documents include bid and pricing data for battery storage projects, as well as other information relating to DEF's process for requesting and selecting proposals. 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.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 2nd day of July, 2024.

Hans Jacob

(Signature)
Hans Jacob
Director, Renewable Business Development
Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 2nd day of July, 2024 by Hans Jacob. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.

Monique Hampton

(Signature)
Monique Hampton

(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: July 3, 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 Staff of the Florida Public Service Commission's ("Staff") Sixth Set of Interrogatories, Question 60. 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 Staff's Sixth Set of Interrogatories, Question 60, contain confidential information. Specifically, these documents include internal sensitive business information regarding DEF's distribution projects, to include its labor and other costs as well as its cost projections. 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 1 day of July, 2024.

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

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 1st day of July, 2024 by Brian M. Lloyd. He is personally known to me or has produced his Florida driver's license, or his N/A as identification.

[Signature]
(Signature)

Veronica L. Salinas
(Printed Name)

NOTARY PUBLIC, STATE OF Florida

April 14, 2028
(Commission Expiration Date)

HH 493381
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)



Jurat Certificate

State of Florida

County of ORANGE

Sworn to (or affirmed) and subscribed before me this 1ST day

of JULY, 20 24, by means of physical presence or online notarization

BRIAN MICHAEL LLOYD (name of person making statement).

Personally known to me _____

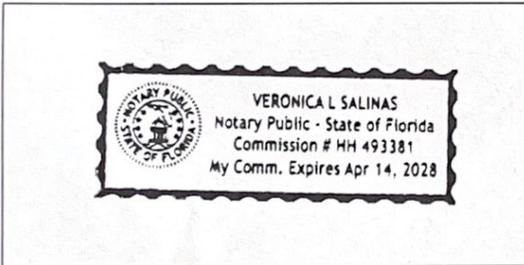
Produced Identification
Type of Identification Produced FLORIDA DRIVER LICENSE

Notary Signature *Veronica Salinas*

Title NOTARY PUBLIC

My appointment expires APRIL 14, 2028

Place Seal Here



Description of Attached document

Type or Title of Document

Affidavit of Brian M Lloyd in Support of Duke Energy Florida LLC Request for Confidential Classificati

Document Date

Number of Pages

07/01/2024

3

Signer(s) Other Than Named Above

NONE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: July 3, 2024

**AFFIDAVIT OF JAMES J. MCCLAY, III 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 James J. McClay, III, who being first duly sworn, on oath deposes and says that:

1. My name is James J. McClay, III. 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 Carolinas, an affiliate company of DEF, as Managing Director Natural Gas Trading.

3. As Managing Director Natural Gas Trading, I manage the organization responsible for natural gas trading, optimization, origination, strategy, pipeline transportation for the regulated gas-fired generation assets fuel oil procurement, and emissions compliance trading.

4. DEF is seeking confidential classification for information contained in response to the Staff of the Florida Public Service Commission's ("Staff") Sixth Set of Interrogatories, Question 67. 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 Staff's Sixth Set of Interrogatories, Question 67, contain confidential information. Specifically, those documents contain internal sensitive business information regarding DEF's asset optimization strategy, as well as its actual and projected savings in relation to its asset optimization activity. 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)
James J. McClay, III
Managing Director Natural Gas Trading
Duke Energy Corporation

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

(Signature)

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF _____

(Commission Expiration Date)

(Serial Number, If Any)