



Dianne M. Triplett
DEPUTY GENERAL COUNSEL

July 10, 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 Seventh Set of Interrogatories (Nos. 74-110). 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 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 20, 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 10, 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”) Seventh Set of Interrogatories (Nos. 74-110). DEF’s Notice of Intent to Request Confidential Classification was filed June 20, 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 Staff’s Seventh Set of Interrogatories, Question 88, 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 20, 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 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, the information at issue in DEF’s response to Staff’s Seventh Set of Interrogatories, Question 88, includes internal sensitive business information regarding DEF’s analysis of historical sharing between DEF and ratepayers with respect to Asset Operations Management activities. 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 10th day 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 10th day of July, 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 Luebke Earthjustice LULAC & FL Rising 111 S. Martin Luther King Jr. Blvd. Tallahassee, Florida 32301 bmarshall@earthjustice.org jluebke@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@wclawoffice.com</p>

Exhibit A

“CONFIDENTIAL”

(filed under separate cover on June 20, 2024)

Exhibit B

REDACTED

(copy-one)

Staff ROG 7-88

Actual Historic Sharing

Year	Gains on Economy Sales (A6)		Economy Sales (A6) Customer Savings	Fuel Purchase Savings (A6)	Sale of RECs	Gas Storage Utilization	Delivered Gas Sales Using Existing Transport	Production (Upstream) Area Sales	Capacity Release of Gas Transport	Asset Management Agreement	Coal Transportation Savings	Total Allocation	
	Economy Sales (A6)	Shareholder Incentives										Customer Savings	Shareholder Incentive
2008	\$ 1,080,436	\$ -	\$ 1,080,436	\$ 30,779,068	NA							\$ 3,820,207	\$ -
2009	\$ 1,219,086	\$ -	\$ 1,219,086	\$ 2,601,121	NA							\$ 3,820,207	\$ -
2010	\$ 1,116,387	\$ -	\$ 1,116,387	\$ 24,498,302	NA							\$ 25,614,690	\$ -
2011	\$ 352,650	\$ -	\$ 352,650	\$ 16,135,504	NA							\$ 21,460,855	\$ -
2012	\$ 298,813	\$ -	\$ 298,813	\$ (1,840,426)	NA							\$ 5,021,398	\$ -
2013	\$ 427,107	\$ -	\$ 427,107	\$ 1,274,325	NA							\$ 7,473,207	\$ -
2014	\$ 4,493,609	\$ 826,817	\$ 5,320,426	\$ 2,201,980	NA							\$ 8,483,724	\$ 826,817
2015	\$ 3,720,655	\$ 396,162	\$ 4,116,817	\$ (1,435,753)	NA							\$ 4,341,194	\$ 396,162
2016	\$ 843,842	\$ -	\$ 843,842	\$ 1,314,457	NA							\$ 3,147,300	\$ -
2017	\$ 887,371	\$ -	\$ 887,371	\$ 2,811,900	NA							\$ 4,799,424	\$ -
2018	\$ 2,269,917	\$ 90,526	\$ 2,360,443	\$ 6,196,147	NA			104,500				\$ 10,342,551	\$ 90,526
2019	\$ 1,649,135	\$ 63,085	\$ 1,712,220	\$ 2,068,894	NA							\$ 6,447,917	\$ 63,085
2020	\$ 1,232,710	\$ -	\$ 1,232,710	\$ 1,119,366	NA							\$ 5,937,769	\$ -
2021	\$ 2,855,389	\$ 228,227	\$ 3,083,616	\$ 7,393,890	NA				37,500			\$ 14,064,839	\$ 228,227
2022	\$ 5,438,082	\$ 709,734	\$ 6,147,816	\$ 7,684,738	NA				325,750			\$ 18,794,162	\$ 709,734
2023	\$ 3,105,955	\$ -	\$ 3,105,955	\$ 4,948,408	NA	(78,230)			835,000			\$ 18,427,616	\$ -

Hypothetical Scenario ADM Sharing

Year	Total	Threshold 1		Threshold 2		Threshold 2 Allocation		Threshold 3		Threshold 3 Allocation		Total Allocation		CHECK THRESHOLD
		Customer Savings	Threshold (\$4.8M)	Customer Savings	Threshold (\$9.8M)	Customer Savings	Shareholder Incentive	Customer Savings	Shareholder Incentive	Customer Savings	Shareholder Incentive	Customer Savings	Shareholder Incentive	
2008	\$ 31,858,504	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ -	\$ 23,058,504	\$ 11,029,252	\$ 11,029,252	\$ 11,889,252	\$ 13,969,252	\$ -	
2009	\$ 3,820,207	\$ 4,900,000	\$ 4,900,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,820,207	\$ -	\$ -	
2010	\$ 25,614,690	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ -	\$ 15,814,690	\$ 7,907,345	\$ 7,907,345	\$ 14,767,345	\$ 10,847,345	\$ -	
2011	\$ 21,460,855	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ -	\$ 11,669,855	\$ 5,834,927	\$ 5,834,927	\$ 12,694,927	\$ 8,774,927	\$ -	
2012	\$ 5,021,398	\$ 4,900,000	\$ 4,900,000	\$ 48,359	\$ 72,839	\$ 72,839	\$ -	\$ -	\$ -	\$ -	\$ 4,948,559	\$ 72,839	\$ -	
2013	\$ 7,473,207	\$ 4,900,000	\$ 4,900,000	\$ 2,573,207	\$ 1,029,288	\$ 1,543,924	\$ -	\$ -	\$ -	\$ -	\$ 5,929,288	\$ 1,543,924	\$ -	
2014	\$ 8,483,724	\$ 4,900,000	\$ 4,900,000	\$ 4,366,541	\$ 1,746,616	\$ 2,613,925	\$ -	\$ -	\$ -	\$ -	\$ 6,646,616	\$ 2,613,925	\$ -	
2015	\$ 4,737,356	\$ 4,900,000	\$ 4,900,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,737,356	\$ -	\$ -	
2016	\$ 3,147,300	\$ 3,147,300	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,147,300	\$ -	\$ -	
2017	\$ 4,799,424	\$ 4,799,424	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,799,424	\$ -	\$ -	
2018	\$ 10,433,077	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ 633,077	\$ 316,538	\$ 316,538	\$ 7,176,538	\$ 3,256,538	\$ 3,166,013	\$ -	
2019	\$ 6,511,002	\$ 4,900,000	\$ 4,900,000	\$ 1,611,002	\$ 966,601	\$ 966,601	\$ -	\$ -	\$ -	\$ -	\$ 5,544,401	\$ 966,601	\$ -	
2020	\$ 5,937,769	\$ 4,900,000	\$ 4,900,000	\$ 1,037,769	\$ 425,107	\$ 622,662	\$ -	\$ -	\$ -	\$ -	\$ 5,315,107	\$ 622,662	\$ -	
2021	\$ 14,993,066	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ 4,493,066	\$ 2,246,533	\$ 2,246,533	\$ 9,106,533	\$ 5,186,533	\$ 4,958,306	\$ -	
2022	\$ 19,503,896	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ 9,703,896	\$ 4,851,948	\$ 4,851,948	\$ 11,711,948	\$ 7,791,948	\$ 7,082,214	\$ -	
2023	\$ 18,427,616	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ 8,621,616	\$ 4,311,208	\$ 4,311,208	\$ 11,171,208	\$ 7,251,208	\$ 7,251,208	\$ -	

Differences

Year	Total Allocation	
	Customer Savings	Shareholder Incentive
2008	\$ 11,969,252	\$ 13,969,252
2009	\$ 3,820,207	\$ -
2010	\$ 10,847,345	\$ 10,847,345
2011	\$ 8,774,927	\$ 8,774,927
2012	\$ 72,839	\$ 72,839
2013	\$ 1,543,924	\$ 1,543,924
2014	\$ 1,791,107	\$ 1,791,107
2015	\$ 396,162	\$ (896,162)
2016	\$ -	\$ -
2017	\$ -	\$ -
2018	\$ 3,166,013	\$ 3,166,013
2019	\$ 903,516	\$ 903,516
2020	\$ 622,662	\$ 622,662
2021	\$ 4,958,306	\$ 4,958,306
2022	\$ 7,082,214	\$ 7,082,214
2023	\$ 7,251,208	\$ 7,251,208

Exhibit B

REDACTED

(copy-two)

Staff ROG 7-88

Actual Historic Sharing

Year	Gains on Economy Sales (A6)		Economy Sales (A6) Customer Savings	Fuel Purchase Savings (A6)	Sale of RECs	Gas Storage Utilization	Delivered Gas Sales Using Existing Transport	Production (Upstream) Area Sales	Capacity Release of Gas Transport	Asset Management Agreement	Coal Transportation Savings	Total Allocation	
	Economy Sales (A6)	Shareholder Incentives										Customer Savings	Shareholder Incentive
2008	\$ 1,080,436	\$ -	\$ 1,080,436	\$ 30,779,068	NA							\$ 3,820,207	\$ -
2009	\$ 1,219,086	\$ -	\$ 1,219,086	\$ 2,601,121	NA							\$ 3,820,207	\$ -
2010	\$ 1,116,387	\$ -	\$ 1,116,387	\$ 24,498,302	NA							\$ 25,614,690	\$ -
2011	\$ 352,650	\$ -	\$ 352,650	\$ 16,135,504	NA							\$ 21,460,855	\$ -
2012	\$ 298,813	\$ -	\$ 298,813	\$ (1,840,426)	NA							\$ 5,021,398	\$ -
2013	\$ 427,107	\$ -	\$ 427,107	\$ 1,274,325	NA							\$ 7,473,207	\$ -
2014	\$ 4,493,609	\$ 826,817	\$ 5,320,426	\$ 2,201,980	NA							\$ 8,480,724	\$ 826,817
2015	\$ 3,720,655	\$ 396,162	\$ 4,116,817	\$ (1,435,753)	NA							\$ 4,341,194	\$ 396,162
2016	\$ 843,842	\$ -	\$ 843,842	\$ 1,314,457	NA							\$ 3,147,300	\$ -
2017	\$ 887,371	\$ -	\$ 887,371	\$ 2,811,900	NA							\$ 4,799,424	\$ -
2018	\$ 2,269,917	\$ 90,526	\$ 2,360,443	\$ 6,196,147	NA			104,500				\$ 10,342,551	\$ 90,526
2019	\$ 1,649,135	\$ 63,085	\$ 1,712,220	\$ 2,068,894	NA							\$ 6,447,917	\$ 63,085
2020	\$ 1,232,710	\$ -	\$ 1,232,710	\$ 1,119,366	NA							\$ 5,937,769	\$ -
2021	\$ 2,855,389	\$ 228,227	\$ 3,083,616	\$ 7,393,890	NA				37,500			\$ 14,064,839	\$ 228,227
2022	\$ 5,438,082	\$ 709,734	\$ 6,147,816	\$ 7,684,738	NA				325,750			\$ 18,794,162	\$ 709,734
2023	\$ 3,105,955	\$ -	\$ 3,105,955	\$ 4,948,408	NA	(78,230)			\$ 835,000			\$ 18,427,616	\$ -

Hypothetical Scenario ADM Sharing

Year	Total	Threshold 1		Threshold 2		Threshold 2 Allocation		Threshold 3		Threshold 3 Allocation		Total Allocation		CHECK THRESHOLD
		Customer Savings	Threshold (\$2.8M)	Customer Savings	Threshold (\$4.8M - \$9.8M)	Customer Savings	Shareholder Incentive	Customer Savings	Shareholder Incentive	Customer Savings	Shareholder Incentive	Customer Savings	Shareholder Incentive	
2008	\$ 31,858,504	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ -	\$ 23,058,504	\$ 11,029,252	\$ 11,029,252	\$ 11,889,252	\$ 13,969,252	\$ -	\$ -
2009	\$ 3,820,207	\$ 4,900,000	\$ 4,900,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,820,207	\$ -	\$ -	\$ -
2010	\$ 25,614,690	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ -	\$ 15,814,690	\$ 7,907,345	\$ 7,907,345	\$ 14,767,345	\$ 10,847,345	\$ -	\$ 10,847,345
2011	\$ 21,460,855	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ -	\$ 11,669,855	\$ 5,834,927	\$ 5,834,927	\$ 12,694,927	\$ 8,774,927	\$ -	\$ 8,774,927
2012	\$ 5,021,398	\$ 4,900,000	\$ 4,900,000	\$ 121,398	\$ 48,559	\$ 72,839	\$ -	\$ -	\$ -	\$ -	\$ 4,948,559	\$ 72,839	\$ -	\$ 72,839
2013	\$ 7,473,207	\$ 4,900,000	\$ 4,900,000	\$ 2,573,207	\$ 1,029,288	\$ 1,543,924	\$ -	\$ -	\$ -	\$ -	\$ 5,929,288	\$ 1,543,924	\$ -	\$ 1,543,924
2014	\$ 8,480,724	\$ 4,900,000	\$ 4,900,000	\$ 4,366,541	\$ 1,746,616	\$ 2,619,925	\$ -	\$ -	\$ -	\$ -	\$ 6,646,616	\$ 2,619,925	\$ -	\$ 2,619,925
2015	\$ 4,737,356	\$ 4,900,000	\$ 4,900,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,737,356	\$ -	\$ -	\$ -
2016	\$ 3,147,300	\$ 3,147,300	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,147,300	\$ -	\$ -	\$ -
2017	\$ 4,799,424	\$ 4,799,424	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,799,424	\$ -	\$ -	\$ -
2018	\$ 10,433,077	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ 633,077	\$ 316,538	\$ 316,538	\$ 7,176,538	\$ 3,256,538	\$ -	\$ -	\$ 3,166,013
2019	\$ 6,511,002	\$ 4,900,000	\$ 4,900,000	\$ 1,611,002	\$ 644,401	\$ 966,601	\$ -	\$ -	\$ -	\$ -	\$ 5,544,401	\$ 966,601	\$ -	\$ 903,516
2020	\$ 5,937,769	\$ 4,900,000	\$ 4,900,000	\$ 1,037,769	\$ 435,107	\$ 622,661	\$ -	\$ -	\$ -	\$ -	\$ 5,315,107	\$ 622,661	\$ -	\$ 622,661
2021	\$ 14,993,066	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ 4,493,066	\$ 2,246,533	\$ 2,246,533	\$ 9,106,533	\$ 5,186,533	\$ -	\$ -	\$ 4,958,306
2022	\$ 19,503,896	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ 9,703,896	\$ 4,851,948	\$ 4,851,948	\$ 11,711,948	\$ 7,791,948	\$ -	\$ -	\$ 7,082,214
2023	\$ 18,427,616	\$ 4,900,000	\$ 4,900,000	\$ 1,960,000	\$ 2,940,000	\$ 2,940,000	\$ 8,623,616	\$ 4,311,808	\$ 4,311,808	\$ 11,371,808	\$ 7,251,808	\$ -	\$ -	\$ 7,251,808

Differences

Year	Total Allocation	
	Customer Savings	Shareholder Incentive
2008	\$ 11,969,252	\$ 13,969,252
2009	\$ 3,820,207	\$ -
2010	\$ 10,847,345	\$ 10,847,345
2011	\$ 8,774,927	\$ 8,774,927
2012	\$ 72,839	\$ 72,839
2013	\$ 1,543,924	\$ 1,543,924
2014	\$ 1,791,107	\$ 1,791,107
2015	\$ 396,162	\$ (896,162)
2016	\$ -	\$ -
2017	\$ -	\$ -
2018	\$ 3,166,013	\$ 3,166,013
2019	\$ 903,516	\$ 903,516
2020	\$ 622,661	\$ 622,661
2021	\$ 4,958,306	\$ 4,958,306
2022	\$ 7,082,214	\$ 7,082,214
2023	\$ 7,251,808	\$ 7,251,808

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
DEF's Response to Staff's Seventh Set of Interrogatories (Nos. 74-110), specifically, Question 88.	Question 88: Document bearing bates number 20240025-STAFFROG7-00001430 contain confidential information. Specifically, information in columns titled "Gas Storage Utilization," "Delivered Gas Sales Using Existing Transport," "Production (Upstream) Area Sales," "Asset Management Agreement," and "Coal Transportation Savings," 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.

Exhibit D

AFFIDAVIT OF 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 10, 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") Seventh Set of Interrogatories, Question 88. 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.

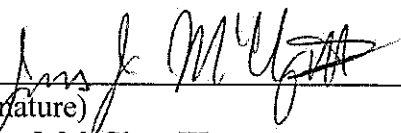
5. Documents produced in response to Staff's Seventh Set of Interrogatories, Question 88, contain confidential information. Specifically, those documents contain internal sensitive business information regarding DEF's analysis of historical sharing between DEF and ratepayers with respect to Asset Operations Management activities. 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 9th day of July, 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 9th day of July, 2024 by James J. McClay, III. He is personally known to me or has produced his North Carolina driver's license, or his _____ as identification.

[Handwritten Signature]
(Signature)

Shamell M. Wilson
(Printed Name)

NOTARY PUBLIC, STATE OF NC

July 06, 2026
(Commission Expiration Date)

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

