

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20240025-EI

Dated: July 18, 2024

**NOTICE OF FILING VERIFIED AFFIDAVITS IN SUPPORT OF DUKE ENERGY
FLORIDA, LLC'S REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida, LLC, ("DEF") hereby gives notice of filing the verified Affidavits of Reginald Anderson, Shannon Caldwell, Hans Jacob, Brian Lloyd, Marcia Olivier, John Panizza, Lesley Quick, and Edward Scott in support of DEF's Request for Confidential Classification, submitted on May 24, 2024 (document number 04185-2024), regarding its Response to LULAC and FL Rising's First Set of Interrogatories (Nos. 1-22) and First Request for Production of Documents (Nos1-8), this 18th day of July, 2024

Respectfully submitted,

/s/ Dianne M. Triplett

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 by electronic mail this 18th day of July, 2024, to the following:

/s/ Dianne M. Triplett

Dianne M. Triplett

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: May 24, 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 (“O&M”) budgets, and I lead the development of regional succession planning.

4. DEF is seeking confidential classification for information contained in response to Florida Rising and League of United Latin American Citizens’ (together, “LULAC”) First Set of Interrogatories, Question 10. A detailed description of the confidential information at issue is contained in Exhibit A to DEF’s Request and is outlined in DEF’s 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 LULAC’s First Set of Interrogatories, Question 10, contain confidential information. Specifically, those documents contain pricing information relating to contracts for goods and services. 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. In addition, the documents in question contain internal sensitive business information regarding future projects and capital investments. 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.

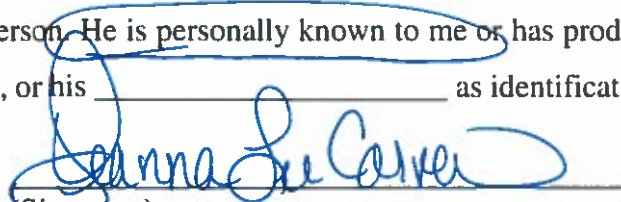
Further affiant sayeth not.

Dated the 29th day of May, 2024.



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

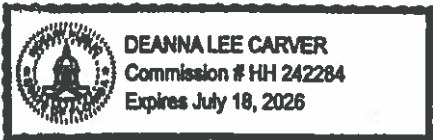
THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 29th day of May, 2024 by Reginald D. Anderson. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



(Signature)
Deanna Lee Carver
(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF FL
July 18, 2026
(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: May 24, 2024

**AFFIDAVIT OF SHANNON CALDWELL 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 Shannon Caldwell, who being first duly sworn, on oath deposes and says that:

1. My name is Shannon Caldwell. 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 a Director of Compensation of Duke Energy Business Services LLC. That section provides various administrative and other services to Duke Energy, DEF, and other affiliated companies of Duke Energy Corporation.

3. As the Director of Compensation, I am responsible for broad-based compensation

for Duke Energy, including all of Duke Energy's affiliated regulated and non-regulated companies (like DEF). I am responsible for compensation design and strategy, management of key vendor relationships, compensation administration and compliance.

4. DEF is seeking confidential classification for information contained in response to Florida Rising and League of United Latin American Citizens' (together, "LULAC") First Request for Production of Documents, Question 2 (Human Resources). 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 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 First Request for Production of Documents, Question 2 (Human Resources), 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.

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 28 day of May, 2024.

Shannon Caldwell

(Signature)

Shannon Caldwell

Director, Compensation

Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 28th day of MAY, 2024 by Shannon Caldwell. She is personally known to me or has produced her _____ driver's license, or her _____ as identification.

Felicia Sueann Rutty

(Signature)

FELICIA SUEANN RUTTY

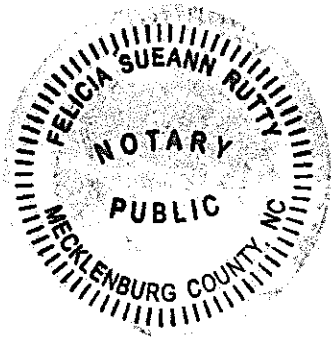
(Printed Name)

NOTARY PUBLIC, STATE OF NORTH CAROLINA

10-1-2028

(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)



(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: May 24, 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 Duke

Energy Florida, LLC (“DEF” or the “Company”). 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 Florida Rising and League of United Latin American Citizens’ (together, “LULAC”) First Request for Production of Documents, Question 2 (Energy Storage). A detailed description of the confidential information at issue is contained in Exhibit A to DEF’s Request and is outlined in DEF’s 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 LULAC’s First Request for Production of Documents, Question 2 (Energy Storage), contain confidential information. Specifically, these documents contain pricing information relating to contracts for goods and services (along with other terms of such agreements). 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.

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.

Hans Jacob

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

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 28th day of May, 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: May 24, 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 Florida Rising and League of United Latin American Citizens' (together, "LULAC") First Request for Production of Documents, Question 2 (Distribution). A detailed description of the confidential information at issue is contained in Exhibit A to DEF's Request and is outlined in DEF's 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 LULAC's First Request for Production of Documents, Question 2 (Distribution), contain confidential information. Specifically, those documents contain pricing information relating to contracts for goods and services. 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.

7. 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.

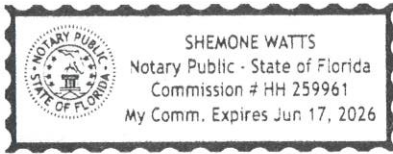
Dated the 17 day of JUNE, 2024.



(Signature)

Brian M. Lloyd
General Manager, Florida Major Projects
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 17 day of JUNE, 2024 by Brian M. Lloyd. He is personally known to me or has produced her Florida driver's license, or his _____ as identification.



(AFFIX NOTARIAL SEAL)



(Signature)



(Printed Name)

NOTARY PUBLIC, STATE OF Florida

6/17/2026

(Commission Expiration Date)

#H 259961

(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: May 24, 2024

**AFFIDAVIT OF MARCIA J. OLIVIER 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 Marcia J. Olivier, who being first duly sworn, on oath deposes and says that:

1. My name is Marcia J. Olivier. 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 the Director of Rates and Regulatory Planning.

3. As Director of Rates and Regulatory Planning, I am responsible for the preparation of jurisdictional separation studies and class cost of service studies, overseeing rate case activities, reporting actual and forecasted earnings and surveillance results, and supporting various regulatory

filings and initiatives.

4. DEF is seeking confidential classification for information contained in response to Florida Rising and League of United Latin American Citizens' (together, "LULAC") First Request for Production of Documents, Question 2 (Rates). 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 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 LULAC's First Request for Production of Documents, Question 2 (Rates), contain confidential information. Specifically, those documents contain internal sensitive business information relating to DEF's administrative costs (e.g., DEF's marketing costs, DEF's management costs, and DEF's costs associated with the interactions it has with customers). 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.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the _____ day of _____, 2024.

(Signature)
Marcia J. Olivier
Director, Rates and Regulatory Planning
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 28th day
of May, 2024 by Marcia J. Olivier. She is personally known to me or has produced her

driver's license, or her _____ as identification.

Marcia Olivier

(Signature)

(AFFIX NOTARIAL SEAL)



(Printed Name)
NOTARY PUBLIC, STATE OF _____
Monique Hampton

(Commission Expiration Date)
Monique Hampton

(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: May 24, 2024

**AFFIDAVIT OF JOHN R. PANIZZA 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 John R. Panizza, who being first duly sworn, on oath deposes and says that:

1. My name is John R. Panizza. 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, Tax Operations. DEBS provides various administrative and other services to DEF and other affiliated companies of Duke Energy Corporation.

3. As Director, Tax Operations, I have overall responsibility for corporate tax

compliance and accounting for Duke Energy and therefore its subsidiary DEF. The Duke Energy Tax Operations Department is responsible for maintaining and reconciling Duke Energy's tax accounts and for the reporting and disclosure of tax-related matters.

4. DEF is seeking confidential classification for information contained in response to Florida Rising and League of United Latin American Citizens' (together, "LULAC") First Request for Production of Documents, Question 2 (Tax). A detailed description of the confidential information at issue is contained in Exhibit A to DEF's Request and is outlined in DEF's 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 LULAC's First Request for Production of Documents, Question 2 (Tax), contain confidential information. Specifically, those documents contain internal sensitive business information relating to DEF affiliate's tax rates. 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 13th day of June, 2024.

John R. Panizza

(Signature)

John R. Panizza

Director, Tax Operations

Duke Energy Business Services, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 13th day of June, 2024 by John R. Panizza. He is personally known to me or has produced her _____ driver's license, or his _____ as identification.

Teresa Ray

(Signature)

Teresa Ray

(Printed Name)

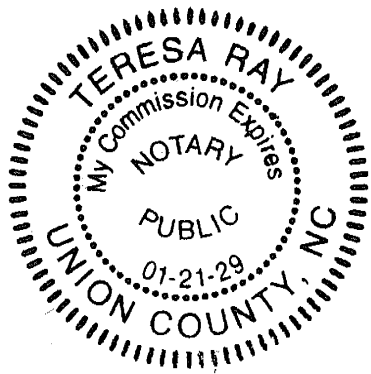
NOTARY PUBLIC, STATE OF NC

01/21/29

(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)

(Serial Number, If Any)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: May 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") First Request for Production of Documents, Question 2 (Customer). 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 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 LULAC's First Request for Production of Documents, Question 2 (Customer), 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.

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 29 day of 5, 2024.

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

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 29th day of May, 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)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: May 24, 2024

**AFFIDAVIT OF EDWARD L. SCOTT 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 Edward L. Scott, who being first duly sworn, on oath deposes and says that:

1. My name is Edward L. Scott. 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 as General Manager of Transmission Planning.

3. As General Manager of Transmission Planning, I am responsible for the planning of Duke Energy's electric transmission system in six states. Areas of focus include development of company Transmission Plans, regional (SERC, RFC, FRCC) and NERC PII as process

strategies and assessments, joint studies with adjacent interconnected utilities and RTOs/ISOs and analysis and studies as required under the FERC Open Access Transmission Tariff (OATT). I am also responsible for ensuring compliance to all safety, environmental and regulatory policies and business practices. I also serve as Vice Chair on the Florida Reliability Coordinating Council's ("FRCC") Operating Committee.

4. DEF is seeking confidential classification for information contained in response to Florida Rising and League of United Latin American Citizens' (together, "LULAC") First Request for Production of Documents, Question 2 (Transmission). 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 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 LULAC's First Request for Production of Documents, Question 2 (Transmission), 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 details about the location and nature of future transmission planning projects. Disclosure of that information could pose significant security risks to DEF, its customers, and the transmission grid.


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.

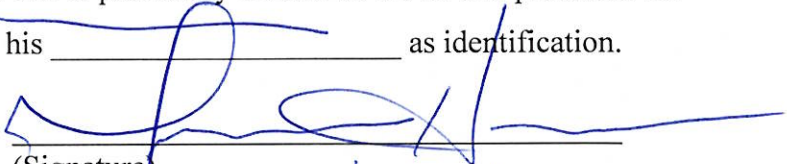
Further affiant sayeth not.

Dated the 19th day of June, 2024.



(Signature)
Edward L. Scott
General Manager, Transmission Planning

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 19th day of June, 2024 by Edward L. Scott. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



(Signature)
Monique Hampton
(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF _____



(Commission Expiration Date)

(Serial Number, If Any)