

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20240025-EI

Dated: July 29, 2024

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

Duke Energy Florida, LLC, ("DEF") hereby gives notice of filing the verified Affidavit of Ned W. Allis, in support of DEF's Amended Request for Confidential Classification, submitted on May 29, 2024 (document number 04368-2024), regarding its Response to OPC's Sixth Set of Interrogatories (Nos. 118-143) and Request for Confidential Classification, submitted on May 28, 2024 (document number 04331-2024), regarding its Response to OPC's Sixth Request for Production of Documents (Nos. 51-65), this 29th day of July, 2024

Respectfully submitted,

/s/ Dianne M. Triplett

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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 29th day of July, 2024, to the following:

/s/ 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 28, 2024

**AFFIDAVIT OF NED W. ALLIS IN SUPPORT OF
DUKE ENERGY FLORIDA, LLC'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CUMBERLAND

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Ned W. Allis, who being first duly sworn, on oath deposes and says that:

1. My name is Ned W. Allis. 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 Gannett Fleming Valuation and Rate Consultants, LLC ("Gannett Fleming"). Gannett Fleming provides depreciation consulting services to utility companies in the United States and Canada.

3. As Vice President, I am responsible for conducting depreciation, valuation, and original cost studies, determining service life and salvage estimates, conducting field reviews,

presenting recommended depreciation rates to clients, and supporting such rates before state and federal regulatory agencies. I am also responsible for Gannett Fleming's proprietary depreciation software, training of depreciation staff, and the development of solutions for technical issues related to depreciation.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Sixth Set of Interrogatories, Question 141. 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 OPC's Sixth Set of Interrogatories, Question 141, contain confidential information. Specifically, the documents contain internal sensitive business information regarding future projects and capital investments. They also contain information relating to DEF's regulatory strategies. That information relates to DEF's competitive business interests, and, absent confidential classification, its disclosure would impair DEF's ability to compete in the marketplace. In addition, the documents in question contain details about the location and nature of future storage projects. Disclosure of that information could pose significant security risks to DEF, its customers, and the 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 17th day of June, 2024.

[Handwritten Signature]

(Signature)

Ned W. Allis
Vice President
Gannett Fleming Valuation and Rate Consultants, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 17th day of June, 2024 by Ned W. Allis. He is personally known to me.

[Handwritten Signature]

(Signature)

Cheryl Ann Rutter

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, COMMONWEALTH OF PENNSYLVANIA

Commonwealth of Pennsylvania - Notary Seal
Cheryl Ann Rutter, Notary Public
Cumberland County
My commission expires February 20, 2027
Commission number 1143028
Member, Pennsylvania Association of Notaries

February 20, 2027

(Commission Expiration Date)

1143028

(Serial Number, If Any)