

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20240025-EI

Dated: July 30, 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 Rebekah Buck and Vanessa Goff, in support of DEF's Request for Confidential Classification, submitted on June 3, 2024 (document number 04497-2024), regarding its Response to OPC's Eighth Set of Interrogatories (Nos. 211-221) and Eighth Request for Production of Documents (Nos. 78-86), this 30th 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 30th 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: June 3, 2024

**AFFIDAVIT OF REBEKAH E. BUCK IN SUPPORT OF
DUKE ENERGY FLORIDA, LLC'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Rebekah E. Buck. I am over the age of 18 years old, and I have been authorized by Duke Energy Florida (hereinafter "DEF" or the "Company") to give this affidavit in the above-styled proceeding on DEF's behalf and in support of DEF's Request for Confidential Classification (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am employed by Duke Energy Business Services, LLC ("DEBS") as Director of Allocations and Reporting. DEBS provides various administrative and other services to DEF.

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

Energy Corporation and its affiliates (like DEF).

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Eighth Set of Interrogatories, Question 211. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

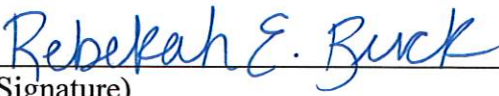
5. Documents produced in response to OPC's Eighth Set of Interrogatories, Question 211, contain basis data calculations underlying costs allocated to or from DEF via its affiliates. This information is internal, proprietary business information. Thus, it relates to DEF's competitive business interests, and, absent confidential classification, its disclosure would impair DEF's ability to compete in the marketplace.

6. Upon receipt of confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 5th day of June, 2024.



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

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 5th day of June, 2024 by Rebekah E. Buck. She is personally known to me or has produced her _____ driver's license, or her _____ as identification.

Teresa Ray

(Signature)

Teresa Ray

(Printed Name)

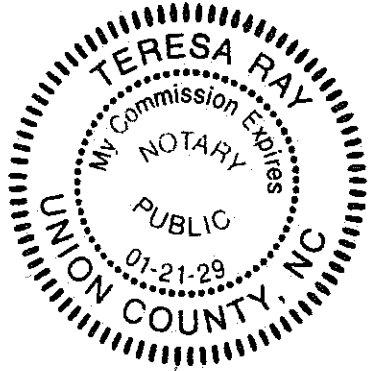
NOTARY PUBLIC, STATE OF NC

01/21/29

(Commission Expiration Date)

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: June 3, 2024

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

STATE OF NEW YORK

COUNTY OF Yates

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 Office of the Public Counsel's ("OPC") Eighth Request for Production of Documents, Question 83, and Eighth Set of Interrogatories, Question 221. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to OPC's Eighth Request for Production of Documents, Question 83, and Eighth Set of Interrogatories, Question 221, 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 solar 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 18th day of June, 2024.

Vanessa A. Goff

(Signature)

Vanessa Goff

Director, Renewables Business Development
Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 18 day of June, 2024 by Vanessa Goff. She is personally known to me or has produced her New York driver's license, or her _____ as identification.

Betty M. Daggett

(Signature)

Betty M. Daggett

(Printed Name)

NOTARY PUBLIC, STATE OF New York

November 5, 2025

(Commission Expiration Date)

01 DA 606162

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

BETTY M. DAGGETT
Notary Public State of New York
Yates County # 01DA606162
Comm. Expires November 5, 2025