

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20240025-EI

Dated: August 2, 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 and Benjamin Borsch, in support of DEF's Request for Confidential Classification, submitted on June 28, 2024 (document number 07042-2024), regarding its Response to Sierra Club's First Set of Interrogatories (Nos. 1-38) and First Request for Production of Documents (Nos. 1-13), this 2nd day of August, 2024

Respectfully submitted,

/s/ Dianne M. Triplett

DIANNE M. TRIPLETT

Deputy General Counsel

299 First Avenue North

St. Petersburg, FL 33701

T: 727. 820.4692

E: Dianne.Triplett@Duke-Energy.com

MATTHEW R. BERNIER

Associate General Counsel

106 E. College Avenue, Suite 800

Tallahassee, FL 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 by electronic mail this 2nd day of August, 2024, to the following:

/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
MThomps@psc.state.fl.us
SStiller@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
wgarner@wgcglawoffice.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
lkilling@llw-law.com
jmelchior@llw-law.com

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20240025-EI

Dated: June 28, 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 budgets, and I lead the development of regional succession planning.

4. DEF is seeking confidential classification for information contained in response to the Sierra Club's First Set of Interrogatories 11 and 17 and First Request for Production of Documents, Question 7. 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 Sierra Club's First Set of Interrogatories 11 and 17 and First Request for Production of Documents, Question 7, contain confidential information. Specifically, these documents contain information relating to DEF's generation projects, to include DEF's costs associated with these projects and internal processes and procedures. That information relates to DEF's competitive business interests, and, thus, its disclosure would impair DEF's ability to compete in the marketplace. In addition, these documents contain pricing and other 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.

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 25 day of July, 2024



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

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 25 day of July, 2024 by Reginald D. Anderson. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



(Signature)

Sandra Cope

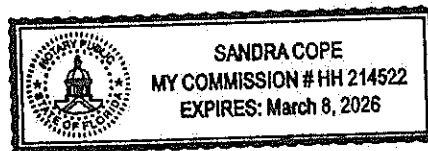
(Printed Name)

NOTARY PUBLIC, STATE OF _____

(AFFIX NOTARIAL SEAL)

(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: June 28, 2024

**AFFIDAVIT OF BENJAMIN H. BORSCH 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 Benjamin H. Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin H. Borsch. 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 Managing Director of Integrated Resource Planning and Analytics.
3. As Managing Director of Integrated Resource Planning and Analytics, I am responsible for directing the resource planning process for DEF in an integrated approach in order to find the most cost-effective alternatives to meet DEF's obligation to serve its customers in

Florida. In this capacity, I oversee numerous studies to evaluate the system impact and cost effectiveness of various proposed and alternative generation projects. I oversee the completion of the Company's Ten-Year Site Plan ("TYSP") filed each April.

4. DEF is seeking confidential classification for information contained in response to the Sierra Club's First Request for Production of Documents, 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 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 Sierra Club's First Request for Production of Documents, Question 10, contain confidential information. Specifically, these documents contain third-party 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.

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 3rd day of July, 2024.



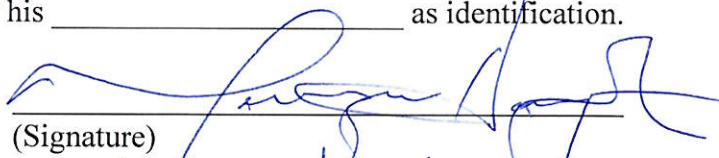
(Signature)

Benjamin H. Borsch

Managing Director, Integrated Resource Planning
and Analytics

Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 3^d day
of July, 2024 by Benjamin H. Borsch. He is personally known to me or has produced his
_____ driver's license, or his _____ as identification.



(Signature)

Monique Hampton

(Printed Name)

NOTARY PUBLIC, STATE OF _____

(AFFIX NOTARIAL SEAL)

(Commission Expiration Date)

(Serial Number, If Any)