

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20240025-EI

Dated: August 6, 2024

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**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 Benjamin M. H. Borsch and Vanessa Goff, in support of DEF's Request for Confidential Classification, submitted on June 3, 2024 (document number 04496-2024), regarding its Response and Supplemental Response to Sierra Club's Second Set of Interrogatories (Nos. 39-75) and Second Request for Production of Documents (Nos. 14-19), this 6<sup>th</sup> day of August, 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 6<sup>th</sup> day of August, 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 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 Second Set of Interrogatories, Questions 43, 45, and 57. 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 Second Set of Interrogatories, Questions 43 and 45, contain confidential information. Specifically, these 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.

6. Documents produced in response to Sierra Club's Second Set of Interrogatories, Question 57, also contain confidential information. Specifically, these documents contain lists of current and potential partners to its Clean Energy Connect renewable energy program. 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.

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 11<sup>th</sup> day of June, 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 11<sup>th</sup> day of June, 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)

(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-E1

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 Sierra Club’s Second Request for Production of Documents, Question 17, and Second Set of Interrogatories, Question 40. 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 Sierra Club’s Second Request for Production of Documents, Question 17, and Second Set of Interrogatories, Question 40, 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 responsive to Sierra Club’s Second Request for Production of Documents, Question 17 contain internal sensitive business information regarding capital expenditures, property tax rates, and tax credits in relation to solar projects. 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 18<sup>th</sup> day of June, 2024.

Vanessa 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)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF New York  
November 5, 2025  
(Commission Expiration Date)

BETTY M. DAGGETT  
Notary Public State of New York  
Yates County # 01DA6066162  
Comm. Expires November 5, 2025

01DA6066162  
(Serial Number, If Any)