

**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 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 Vanessa Goff in support of DEF's Request for Confidential Classification, submitted on June 6, 2024 (document number 04650-2024), regarding its Response to Sierra Club's Third Set of Interrogatories (Nos. 76-90), this 6<sup>th</sup> day of August, 2024

Respectfully submitted,

/s/ 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 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 6, 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 Third Set of Interrogatories, Question 90. 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 Third Set of Interrogatories, Question 90, contain confidential information. Specifically, these documents contain internal sensitive business information about DEF’s solar projects, including its capital expenditures and maintenance costs. 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)