

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Commission review of numeric conservation  
goals (Duke Energy Florida, LLC)

Docket No. 20240013-EG

Dated: August 6, 2024

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

Duke Energy Florida, LLC ("DEF"), hereby gives notice of filing of the verified Affidavit of Tim Duff in support of DEF's Request for Confidential Classification, submitted for filing on July 26, 2024 (document number 07936-2024) regarding its Response to Staff's Fifth Set of Interrogatories (Nos. 50-52), this 6<sup>th</sup> day of August, 2024.

Respectfully submitted,

/s/ Stephanie A. Cuello

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*Attorneys for Duke Energy Florida, LLC*

**CERTIFICATE OF SERVICE**

*Docket No. 20240013-EG*

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 6<sup>th</sup> day of August, 2024.

/s/ Stephanie A. Cuello

Attorney

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Commission review of numeric conservation goals (Duke Energy Florida, LLC)

Docket No. 20240013-EG

Dated: July 26, 2024

**AFFIDAVIT OF TIM DUFF 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 Tim Duff, who being first duly sworn, on oath deposes and says that:

1. My name is Tim Duff. I am over the age of 18 years old and I have been authorized by Duke Energy Florida, Inc. (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 facts attested to in my affidavit are based upon my personal knowledge.

2. I am the General Manager, Customer Solutions Regulatory Enablement. In this role, I am responsible for the development of strategies and policies related to energy efficiency and all other retail products and services.

3. As the General Manager of Customer Solutions Regulatory Enablement, I also oversee the analytics functions associated with evaluating, tracking, and reporting the performance of Duke Energy's retail products and services related to energy efficiency, demand side management programs and all other retail products and services.

4. DEF is seeking confidential classification for a portion of DEF's Response to Staff's Fifth Set of Interrogatories (Nos. 50-52), specifically question 50b, served on July 11, 2024, in this docket. The confidential information at issue is contained in confidential Exhibit A provided with DEF's Request Confidential Classification provided on July 26, 2024 and is outlined in DEF's Justification Matrix attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this information because it contains confidential proprietary business information relating to specific algorithms and calculations regarding cost effectiveness modeling that contain pricing information and competitive data. The disclosure of that information to the public would adversely impact DEF and third-party vendors' competitive business interests.

5. Upon receipt of confidential information from utility system equipment and power suppliers, as well as with its own 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 the Company, and restricting the number of, and access to the information and contracts. At no time since receiving the contracts and information in question has the Company publicly disclosed that information or contracts. The Company has treated and continues to treat the information and contracts at issue as confidential.

6. This concludes my affidavit.

Further affiant sayeth not.


Dated the 29<sup>th</sup> day of July, 2024.



(Signature)  
Tim Duff  
General Manager  
Customer Solutions Regulatory Enablement  
Duke Energy  
550 South Tryon Street  
Charlotte, NC 28202

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 29<sup>th</sup> day of July, 2024, by Tim Duff. He is personally known to me or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.



  
\_\_\_\_\_  
(Signature)

Peggy Holton  
\_\_\_\_\_  
(Printed Name)

NOTARY PUBLIC, STATE OF NORTH CAROLINA

12/22/2026  
\_\_\_\_\_  
(Commission Expiration Date)

\_\_\_\_\_  
(Serial Number, If Any)