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## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20240025-EI

Dated: August 9, 2024

## 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

Reginald Anderson in support of DEF's Request for Confidential Classification, submitted on June 27,

2024 (document number 07015-2024), regarding its Response to Sierra Club's Sixth Request for

Production of Documents (Nos. 30-32), this 9th 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 9<sup>th</sup> day of August, 2024, to the following:

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<u>/s/ Dianne M. Triplett</u>

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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 27, 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 Sixth Request for Production of Documents, Question 32. 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 Sixth Request for Production of Documents, Question 32, contain confidential information. Specifically, these documents contain information relating to DEF's generation projects, to include DEF's costs associated with these projects. 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.

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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  $2 \le day$  of  $1 \lor 1 \lor 2$ , 2024 by Reginald D. Anderson. He is personally known to me or has produced his \_\_\_\_\_\_ driver's license, or his \_\_\_\_\_\_ as identification.

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(Signature) 52ndy	C	ഗ	P	~
(Printed Name)				

NOTARY PUBLIC, STATE OF \_\_\_\_\_

(AFFIX NOTARIAL SEAL)

(Commission Expiration Date)

(Serial Number, If Any)

