

**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 19, 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 Hans Jacob and Jeffrey Kopp, in support of DEF's Request for Confidential Classification, submitted on June 4, 2024 (document number 04569-2024), regarding its Response to OPC's Tenth Set of Interrogatories (Nos. 245-276) and Tenth Request for Production of Documents (Nos. 94-105), this 19<sup>th</sup> 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](mailto: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](mailto: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](mailto:Stephanie.Cuello@duke-energy.com)

[FLRegulatoryLegal@duke-energy.com](mailto: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 19<sup>th</sup> 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](mailto:JCrawfor@psc.state.fl.us)  
[MThompso@psc.state.fl.us](mailto:MThompso@psc.state.fl.us)  
[SStiller@psc.state.fl.us](mailto: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](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)

Tony Mendoza / Patrick Woolsey  
Sierra Club  
2101 Webster Street Suite 1300  
Oakland, CA 94612  
[tony.mendoza@sierraclub.org](mailto:tony.mendoza@sierraclub.org)  
[patrick.woolsey@sierraclub.org](mailto:patrick.woolsey@sierraclub.org)

Sari Amiel  
Sierra Club  
50 F St. NW, Eighth Floor  
Washington, DC 20001  
[sari.amiel@sierraclub.org](mailto: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](mailto:rehwinkel.charles@leg.state.fl.us)  
[trierweiler.walt@leg.state.fl.us](mailto:trierweiler.walt@leg.state.fl.us)  
[watrous.austin@leg.state.fl.us](mailto:watrous.austin@leg.state.fl.us)  
[wessling.mary@leg.state.fl.us](mailto: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](mailto:bmarshall@earthjustice.org)  
[jluebkekmann@earthjustice.org](mailto:jluebkekmann@earthjustice.org)  
[hlochan@earthjustice.org](mailto:hlochan@earthjustice.org)  
[flcaseupdates@earthjustice.org](mailto: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](mailto:schef@gbwlegal.com)  
[jlavia@gbwlegal.com](mailto: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](mailto:pjm@smxblaw.com)  
[mkl@smxblaw.com](mailto:mkl@smxblaw.com)  
[jrb@smxblaw.com](mailto: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](mailto:jbrew@smxblaw.com)  
[lwb@smxblaw.com](mailto:lwb@smxblaw.com)  
[sbn@smxblaw.com](mailto: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@wcelawoffice.com](mailto:wgarner@wcelawoffice.com)

Nikhil Vijaykar  
Keyes & Fox LLP  
EVgo Services, LLC  
580 California St., 12th Floor  
San Francisco, CA 94104  
[nvijaykar@keyesfox.com](mailto:nvijaykar@keyesfox.com)

Lindsey Stegall  
EVgo Services, LLC  
11835 W. Olympic Blvd., Ste. 900E  
Los Angeles, CA 90064  
[Lindsey.Stegall@evgo.com](mailto: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](mailto:fAschauer@llw-law.com)  
[acharles@llw-law.com](mailto:acharles@llw-law.com)  
[lkillinge@llw-law.com](mailto:lkillinge@llw-law.com)  
[jmelchior@llw-law.com](mailto: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 25, 2024

**AFFIDAVIT OF HANS JACOB 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 Hans Jacob, who being first duly sworn, on oath deposes and says that:

1. My name is Hans Jacob. 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 Renewable Business Development.

3. As a Director of Renewable Business Development, I am responsible for the development of battery energy storage systems ("BESS") projects in Florida on behalf of DEF. I lead a team of project developers responsible for the initiation and deployment of regulated battery

energy storage and microgrid systems.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Tenth Set of Interrogatories, Question 268. 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 OPC's Tenth Set of Interrogatories, Question 268, contain confidential information. Specifically, these documents contain costs associated with DEF's energy storage projects, including pricing 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<sup>th</sup> day of June, 2024.

*Hans Jacob*

(Signature)  
Hans Jacob  
Director, Renewable Business Development  
Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 25<sup>th</sup> day of June, 2024 by Hans Jacob. He is personally known to me or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.

*Monique Hampton*

(Signature)

Monique Hampton

(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 4, 2024

**AFFIDAVIT OF JEFFREY T. KOPP 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 Jeffrey T. Kopp, who being first duly sworn, on oath deposes and says that:

1. My name is Jeffrey T. Kopp. 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 1898 & Co., part of Burns & McDonnell Engineering Company, Inc., as the Senior Managing Director of the Energy & Utilities Consulting Department. I oversee more than 250 engineers and consultants who provide consulting services to clients primarily in the electric power generation and electric power transmission industries, but also to other industrial and commercial clients. The services provided by this group of engineers and consultants include

decommissioning cost studies, independent engineering assessments of existing power generation assets, economic evaluations of capital expenditures, new power generation development and evaluation, electric and water rate analysis, electric transmission planning, generation resource planning, renewable power development, and other related engineering and economic assessments.

3. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Tenth Request for Production of Documents, Questions 94, 97, and 98, and OPC's Tenth Set of Interrogatories, Questions 257, 263, and 265. 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.

4. Documents produced in response to OPC's Tenth Request for Production of Documents, Questions 94, 97, and 98, and OPC's Tenth Set of Interrogatories, Questions 257 and 265, contain confidential information. Specifically, the documents reflect data used to produce a dismantlement study. The study (and the model used to create it) is propriety, and public disclosure would permit competitors to copy it. In addition, the documents reflect DEF's dismantlement costs (to include for labor and other services) and scrap values. Thus, disclosure would impair competition in the marketplace.

5. Documents produced in response to OPC's Tenth Set of Interrogatories, Question 263, contain confidential information. Specifically, the documents contain pricing information relating to leases for real estate. 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. The documents also contain detailed information about the location

of solar generation projects. Disclosure of that information could pose significant security risk to DEF, its customers, and the transmission grid.

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.

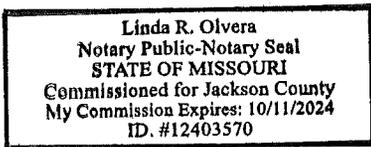
Dated the 19<sup>th</sup> day of August, 2024.

Jeffrey T Kopp

(Signature)

Jeffrey T. Kopp  
Senior Managing Director  
1898 & Co.

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 19 day of August, 2024 by Jeffrey T. Kopp. He is personally known to me or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.



(AFFIX NOTARIAL SEAL)

Linda R. Olvera

(Signature)

Linda R. Olvera

(Printed Name)

NOTARY PUBLIC, STATE OF Missouri

10/11/2024

(Commission Expiration Date)

12403570

(Serial Number, If Any)