

**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 21, 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 Edward Scott, in support of DEF's Request for Confidential Classification, submitted on June 24, 2024 (document number 07801-2024), regarding its Response to OPC's Thirteenth Set of Interrogatories (Nos. 334-338) and Thirteenth Request for Production of Documents (Nos. 142-145), this 21<sup>st</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 21<sup>st</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: July 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 its Response to OPC's Thirteenth Set of Interrogatories (Nos. 334-338) and Thirteenth Request for Production of Documents (Nos. 142-145), specifically, Interrogatory No. 338 and Request No. 145. 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. OPC's Thirteenth Set of Interrogatories (Nos. 334-338) and Thirteenth Request for Production of Documents (Nos. 142-145), specifically, Interrogatory No. 338 and Request No. 145, contain confidential information. Specifically, these documents contain DEF's energy storage projects, including pricing relating to contracts for goods and services. That information is proprietary and relates to DEF's competitive business interests. 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 and 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 25 day of July, 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 day of July, 2024 by Hans Jacob. He is personally known to me or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.

*Mary E. Diez*

(Signature)

*MARY E. DIEZ*

(Printed Name)

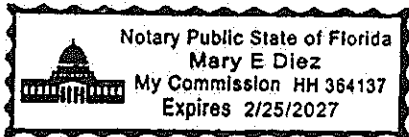
(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF

*FLORIDA*

*2-25-2027*

(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: July 24, 2024

**AFFIDAVIT OF EDWARD L. SCOTT 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 Edward L. Scott, who being first duly sworn, on oath deposes and says that:

1. My name is Edward L. Scott. 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 as General Manager of Transmission Planning.

3. As General Manager of Transmission Planning, I am responsible for the planning of Duke Energy's electric transmission system in six states. Areas of focus include development of company Transmission Plans, regional (SERC, RFC, FRCC) process strategies and assessments, joint studies with adjacent interconnected utilities and RTOs/ISOs, and analysis and

studies as required under the FERC Open Access Transmission Tariff. I am also responsible for ensuring compliance to all safety, environmental and regulatory policies, and business practices. I also serve as Vice Chair on the Florida Reliability Coordinating Council's Operating Committee.

4. DEF is seeking confidential classification for information contained in its response to the Office of Public Counsel's ("OPC") Thirteenth Request for Production of Documents, Question 145, and OPC's Thirteenth Set of Interrogatories, Question 338. 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 OPC's Thirteenth Request for Production of Documents, Question 145, and OPC's Thirteenth Set of Interrogatories, Question 339, contain confidential information. Specifically, these documents contain detailed information about costs, location, and nature of DEF's transmission projects. Disclosure of that information could pose significant security risks to DEF, its customers, and the grid.

6. Additionally, the documents contain information relating to DEF's transmission projects and upgrades, as well as DEF's current and estimated expenditures associated with these projects and upgrades. When viewed together, that information relates to DEF's competitive business interests, and, thus, its disclosure 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.

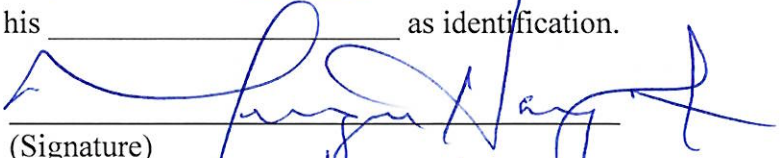
Further affiant sayeth not.

Dated the 24 day of JULY, 2024.



\_\_\_\_\_  
(Signature)  
Edward L. Scott  
General Manager, Transmission Planning  
Duke Energy

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 24<sup>th</sup> day of July, 2024 by Edward L. Scott. 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)

