BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20240025-EI

Dated: August 21, 2024

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 Brian Lloyd and Edward Scott, in support of DEF's Request for Confidential Classification, submitted on June 4, 2024 (document number 04566-2024), regarding its Response to OPC's Ninth Set of Interrogatories (Nos. 222-244) and Ninth Request for Production of Documents (Nos. 87-93), this 21st day of August, 2024

Respectfully submitted,

/s/ Dianne M. Triplett

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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 21st 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 4, 2024

AFFIDAVIT OF BRIAN M. LLOYD 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 Brian M. Lloyd, who being first duly sworn, on oath deposes and says that:

1. My name is Brian M. Lloyd. 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 General Manager, Florida Major Projects.

3. As General Manager, my duties and responsibilities include planning for grid upgrades, system planning, and overall Distribution asset management strategy across DEF, as well as the Project Management for executing the work identified. Additionally, I manage organizations that execute the developer interactions and engineer large residential developments across the DEF territory.

4. DEF is seeking confidential classification for information contained in response to the Office of Public Counsel's ("OPC") Ninth Request for Production of Documents, Questions 87 and 91, and OPC's Ninth Set of Interrogatories, Questions 224, 230, 232, 235, and 236. 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 Ninth Request for Production of Documents, Question 87, and OPC's Ninth Set of Interrogatories, Question 224, contain confidential information. Specifically, these documents contain information relating to DEF's reliability performance as compared to other utilities. That information is proprietary, and it relates to DEF's competitive business interests. Thus, its disclosure would impair DEF's ability to compete in the marketplace.

6. Documents produced in response to OPC's Ninth Request for Production of Documents, Question 91, contain confidential information. Specifically, these documents contain detailed information about the location and nature of distribution projects. Disclosure of that information could pose significant security risks to DEF, its customers, and the grid.

7. Documents produced in response to OPC's Ninth Set of Interrogatories, Questions 230, 232, 235, and 236, contain confidential information. Specifically, these documents contain information relating to DEF's future distribution projects, as well as DEF's current and estimated 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.

8. 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.

9. This concludes my affidavit.

Further affiant sayeth not.

Dated the 17 day of June, 2024.

(Signature)
Brian M. Lloyd
General Manager, Florida Major Projects
Duke Energy Florida, LLC

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 17 day of June, 2024 by Brian M. Lloyd. He is personally known to me or has produced his Florida driver's license, or his _____ as identification.

SHEMONE WATTS
Notary Public - State of Florida
Commission # HH 259961
My Comm. Expires Jun 17, 2026

(AFFIX NOTARIAL SEAL)

(Signature)
Shemone Watts
(Printed Name)
NOTARY PUBLIC, STATE OF Florida
6/17/2026
(Commission Expiration Date)
HH 259961
(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 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 response to the Office of Public Counsel's ("OPC") Ninth Request for Production of Documents, Question 92, and OPC's Ninth Set of Interrogatories, Questions 239, 241, 243, and 244. 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 Ninth Request for Production of Documents, Question 92, and OPC's Ninth Set of Interrogatories, Question 239, contain confidential information. Specifically, these documents contain detailed information about the location and nature of DEF's transmission system. Disclosure of that information could pose significant security risks to DEF, its customers, and the grid.

6. Documents produced in response to OPC's Ninth Set of Interrogatories, Questions 239, 241, 243, and 244, contain confidential information. Specifically, these 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 15 day of AUGUST, 2024.

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

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 15th day of August, 2024 by Edward L. Scott. He is personally known to me or has ~~produced his~~ FL Drivers Lic driver's license, or his _____ as identification.

Sandra L Brice
(Signature)
Sandra L Brice
(Printed Name)
NOTARY PUBLIC, STATE OF Florida

(AFFIX NOTARIAL SEAL)

_____
(Commission Expiration Date)

_____
(Serial Number, If Any)

SANDRA L. BRICE
Commission # HH 220583
Expires February 10, 2026