



Stephanie A. Cuello
SENIOR COUNSEL

March 27, 2025

VIA ELECTRONIC FILING

Mr. Adam J. Teitzman, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket 20250032-EI, Review of Incentive Mechanisms for the Electric Investor-Owned Utilities

Dear Mr. Teitzman,

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF"), DEF's Request for Confidential Classification for certain information provided in its Response to Staff's First Data Request (Nos. 1-23), specifically question 20. The filing includes the following:

- DEF's Request for Confidential Classification
- Slip-sheet for confidential Exhibit A
- Redacted Exhibit B (two copies)
- Exhibit C (justification matrix), and
- Exhibit D (affidavit James McClay)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on March 6, 2025, under separate cover.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1425 should you have any questions concerning this filing.

Respectfully,

/s/ Stephanie A. Cuello

Stephanie A. Cuello

SAC/clg
Attachments

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Incentive Mechanisms for
the Electric Investor-Owned Utilities

Docket No. 20250032-EI

Dated: March 27, 2025

**DUKE ENERGY FLORIDA, LLC'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida, LLC (“DEF” or “Company”), pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), submits this Request for Confidential Classification for certain information contained in its Response to Staff’s First Data Request (Nos. 1-23), which was submitted concurrently with DEF’s Notice of Intent to Request Confidential Classification on March 6, 2025. This Request is timely. See Rule 25-22.006(3)(a)1, E.A.C. In support of this Request, DEF states:

1. Information contained in DEF’s Response to Staff’s First Data Request (Nos. 1-23) specifically, Question 20, contains “confidential proprietary business information” under Section 366.093(3), F.S.

2. The following exhibits are included with this request:

(a) Sealed Composite Exhibit A is a package containing unredacted copies of all documents for which DEF seeks confidential treatment. Composite Exhibit A was submitted separately in a sealed envelope labeled “CONFIDENTIAL” on March 6, 2025. In the unredacted versions, the information asserted to be confidential is highlighted in yellow.

(b) Composite Exhibit B is a package containing two copies of redacted versions of the documents for which the Company requests confidential classification. The specific

information for which confidential treatment is requested has been blocked out by opaque marker or other means.

(c) Exhibit C is a table which identifies by page and line the information for which DEF seeks confidential classification and the specific statutory bases for seeking confidential treatment.

(d) Exhibit D is an affidavit of Jim McClay, attesting to the confidential nature of the information identified in this request.

3. As indicated in Exhibit C, the information for which DEF requires confidential classification is “proprietary confidential business information” within the meaning of §366.093(3), F.S. Specifically, the information at issue in DEF’s response to Staff’s First Data Request, Question 20, provides Gas Storage Utilization, Delivered Gas Sales, Production, Asset Management Agreement Amounts, and Coal Transportation Savings. Disclosure of this information would enable fuel suppliers to obtain competitive information, which would result in greater price convergence in future negotiations. Affidavit of James McClay at ¶ 5. As such, disclosure of the information would impair the Company’s efforts to contract for goods or services on favorable terms. *See* § 366.093(3)(d), F.S.; Affidavit of James McClay ¶¶ 5 and 6. Additionally, if the information at issue was publicly disclosed, DEF’s efforts to obtain competitive energy supply that provides economic value to both DEF and its customers could be compromised by DEF’s competitors changing their consumption or purchasing behavior within the relevant markets. § 366.093(3)(e), F.S.; Affidavit of James McClay at ¶6. Accordingly, such information constitutes “proprietary confidential business information” which is exempt from disclosure under the Public Records Act pursuant to Section 366.093(1), F.S.

4. The information identified in Exhibit “A “is intended to be and is treated as

confidential by DEF. *See* Affidavit of James McClay at ¶ 7. Further, that information has not been disclosed to the public. *See* Affidavit of James McClay at ¶ 7.

5. DEF requests that the information identified in Exhibit A be classified as “proprietary confidential business information” within the meaning of section 366.093(3), F.S., that the information remain confidential for a period of at least 18 months as provided in section 366.093(4) F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

WHEREFORE, for the foregoing reasons, DEF respectfully requests that this Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 27th day of March 2025.

/s/ Stephanie A. Cuello
DIANNE TRIPLETT
Deputy General Counsel
299 1st Avenue North
St. Petersburg, Florida 33701
T: (727) 820-4692
E: dianne.triplett@duke-energy.com

MATTHEW R. BERNIER
Associate General Counsel
106 East College Avenue, Suite 800
Tallahassee, Florida 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. 20250032-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 27th day of March 2025.

/s/ Stephanie A. Cuello

Carlos Marquez / Shaw Stiller
Office of General Counsel
FL Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
CMarquez@psc.state.fl.us
sstiller@psc.state.fl.us
discovery-gcl@psc.state.fl.us

J. Wahlen / M. Means / V. Ponder
Ausley McMullen
Tampa Electric Company
P.O. Box 391
Tallahassee, FL 32302
jwahlen@ausley.com
mmeans@ausley.com
vponder@ausley.com

W. Trierweiler / C. Rehwinkel
Office of Public Counsel
111 W. Madison St., Room 812
Tallahassee, FL 32399-1400
trierweiler.walt@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Beth Keating
Gunster, Yoakley & Stewart, P.A.
Florida Public Utilities Company
215 South Monroe Street, Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

Christopher Wright
Florida Power & Light Company
700 Universe Blvd
Juno Beach, FL 33408-0420
christopher.wright@fpl.com

Exhibit A

“CONFIDENTIAL”

(filed under separate cover on March 6, 2025)

Exhibit B

REDACTED

(copy-one)

Docket No. 20250032-EI
 Data Request Question #20

Year	Gas Storage Utilization (\$000)	Delivered Gas Sales - Using Existing Transport (\$000)	Production (Upstream) Area Sales (\$000)	Capacity Release of Gas Transport (\$000)	Asset Management Agreement (\$000)	Coal Transportation Savings (\$000)	Sales of Renewable Energy Credits (\$000)	Fuel Purchases (A9) (\$000)	Economy Sales (A6) (\$000)	Total Activity Savings (\$000)
2013				\$ -			\$ -	\$ 1,274	\$ 427	\$ 7,473
2014				\$ -			\$ -	\$ 2,202	\$ 4,494	\$ 9,267
2015				\$ -			\$ -	\$ (1,436)	\$ 3,721	\$ 4,737
2016				\$ -			\$ -	\$ 1,314	\$ 844	\$ 3,147
2017				\$ -			\$ -	\$ 2,812	\$ 887	\$ 4,789
2018				\$ 105			\$ -	\$ 6,196	\$ 2,270	\$ 10,433
2019				\$ -			\$ -	\$ 2,069	\$ 1,649	\$ 6,511
2020				\$ -			\$ -	\$ 1,119	\$ 1,224	\$ 5,938
2021				\$ 38			\$ -	\$ 7,394	\$ 2,855	\$ 14,293
2022				\$ 326			\$ -	\$ 7,685	\$ 5,458	\$ 19,504
2023				\$ 835			\$ (78)	\$ 4,949	\$ 3,106	\$ 18,423
2024				\$ 578			\$ (97)	\$ (4,246)	\$ 4,454	\$ 10,233

Exhibit B

REDACTED

(copy-two)

Docket No. 20250032-EI
Data Request Question #20

Year	Gas Storage Utilization (\$000)	Delivered Gas Sales - Using Existing Transport (\$000)	Production (Upstream) Area Sales (\$000)	Capacity Release of Gas Transport (\$000)	Asset Management Agreement (\$000)	Coal Transportation Savings (\$000)	Sales of Renewable Energy Credits (\$000)	Fuel Purchases (A9) (\$000)	Economy Sales (A6) (\$000)	Total Activity Savings (\$000)
2013				\$ -			\$ -	\$ 1,274	\$ 427	\$ 7,473
2014				\$ -			\$ -	\$ 2,202	\$ 4,494	\$ 9,267
2015				\$ -			\$ -	\$ (1,436)	\$ 3,721	\$ 4,737
2016				\$ -			\$ -	\$ 1,314	\$ 844	\$ 3,147
2017				\$ -			\$ -	\$ 2,812	\$ 887	\$ 4,789
2018				\$ 105			\$ -	\$ 6,196	\$ 2,270	\$ 10,433
2019				\$ -			\$ -	\$ 2,069	\$ 1,649	\$ 6,511
2020				\$ -			\$ -	\$ 1,119	\$ 1,224	\$ 5,938
2021				\$ 38			\$ -	\$ 7,394	\$ 2,855	\$ 14,293
2022				\$ 326			\$ -	\$ 7,685	\$ 5,458	\$ 19,504
2023				\$ 835			\$ (78)	\$ 4,949	\$ 3,106	\$ 18,423
2024				\$ 578			\$ (97)	\$ (4,246)	\$ 4,454	\$ 10,233

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

RESPONSE/DOCUMENT	PAGE/LINE	JUSTIFICATION
<p>DEF's Response to Staff's First Data Request (Nos. 1-23) specifically, Question 20.</p>	<p>Question 20: All information in the columns titled " Gas Storage Utilization," "Delivered Gas Sales," "Production (Upstream Area Sales," "Asset Management Agreement" and Coal Transportation Savings" is confidential in its entirety.</p>	<p>§366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

Exhibit D

AFFIDAVIT OF JIM MCCLAY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Incentive Mechanisms
for the Electric Investor-Owned Utilities

Docket No. 20250032-EI

Dated: March 27, 2025

**AFFIDAVIT OF JAMES MCCLAY 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 James McClay, who being first duly sworn, on oath deposes and says that:

1. My name is James McClay. 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 the Managing Director of Natural Gas Trading. This section is responsible for power trading, financial hedging activities, oil procurement and emissions trading for Duke Energy Indiana ("DEI"), and Duke Energy Ohio/Kentucky ("DEOK").

3. As the Managing Director of Natural Gas Trading, I am responsible, along with the other members of the section, for the management of the natural gas trading, optimizations, and scheduling functions for the regulated gas-fired generations assets in

the Carolinas, Duke Energy Progress, LLC (“DEP” or the “Company”) and Duke Energy Carolinas, LLC (“DEC”), Duke Energy Florida, Duke Energy Indiana and Duke Energy Kentucky for DEI, DEOK, Duke Energy Carolinas (“DEC”), Duke Energy Progress (“DEP”), and DEF Systems.

4. DEF is seeking confidential classification for information contained its Response to Staff’s First Data Request (1-23), specifically question 20, served on March 6, 2025, in this docket. A detailed description of the confidential information at issue is contained in confidential Exhibit A provided with DEF’s Request for Confidential Classification 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 sensitive business information, the disclosure of which would impair the Company’s efforts to contract for goods or services on favorable terms.

5. DEF negotiates with potential fuel suppliers to obtain competitive contracts for fuel options that provide economic value to DEF and its customers. In order to obtain such contracts, however, sensitive business information, such as Gas Storage Utilization, Delivered Gas Sales, Production, Asset Management Agreement Amounts, and Coal Transportation Savings, must be kept confidential. With respect to the information at issue in this Request, DEF has kept confidential and has not publicly disclosed confidential information. Without DEF’s measures to maintain the confidentiality of sensitive terms, the Company’s efforts to obtain competitive fuel supply contracts could be undermined, because potential fuel suppliers could simply offer the highest prices that would allow them to maintain marginally competitive position against the disclosed volumes and percentages.

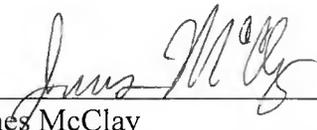
6. Additionally, the disclosure of this confidential information, could adversely impact DEF's competitive business interests. If such information was disclosed to DEF's competitors, DEF's efforts to obtain competitive fuel supply options that provide economic value to both DEF and its customers could be compromised by DEF's competitors changing their consumption or purchasing behavior within the relevant markets.

7. Upon receipt of 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. The Company has treated and continues to treat the information and contracts at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

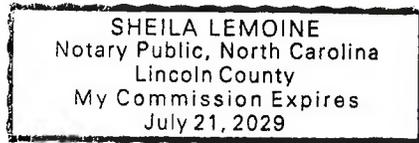
Dated the 27th day of March, 2025.



James McClay
Managing Director – Natural Gas Trading
Duke Energy
525 South Church
Charlotte, NC 28202

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 27 day of March, 2025 by James McClay. He is personally known to me, or has produced his North Carolina driver's license, or his _____ as identification.

(AFFIX NOTARIAL SEAL)



Sheila Lemoine
(Signature)

Sheila Lemoine
(Printed Name)

NOTARY PUBLIC,
STATE OF NORTH CAROLINA

July 21, 2029
(Commission Expiration Date)

20011930065
(Serial Number, If Any)