

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination that )  
the Osprey Plant Acquisition and, )  
alternatively, the Suwannee Simple )  
Cycle Project is the most Cost Effective )  
Generation Alternative to meet the )  
Remaining Need Prior to 2018 for )  
Duke Energy Florida, Inc. )

DOCKET NO. 150043-EI

Submitted for filing: April 8, 2015

RECEIVED-FPSC  
15 APR - 8 AM 11:34  
COMMISSION CLERK

**REDACTED**

**DUKE ENERGY FLORIDA, INC.'S THIRD REQUEST FOR  
CONFIDENTIAL CLASSIFICATION REGARDING RESPONSES TO  
STAFF'S FIRST SET OF INTERROGATORIES NOS. 1-30 AND FIRST  
REQUEST FOR PRODUCTION OF DOCUMENTS NOS. 1 - 13**

Duke Energy Florida, Inc. ("DEF" or the "Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(3), Florida Administrative Code ("F.A.C."), files this Request for Confidential Classification Regarding Portions of DEF's Response to Staff's First Set of Interrogatories Nos. 1-30 and First Request for Production of Documents Nos. 1-13. Specifically, portions of DEF's responses to Interrogatories Nos. 6, 7, 12, 16, and 26b and DEF's responses to Staff's First Request for Production of Documents Nos. 1, 2, and 11 contain proprietary confidential business and contractual information the disclosure of which would adversely impact DEF's and third parties' competitive business interests and, if publicly disclosed, would violate contractual confidentiality provisions. An unredacted version of the documents discussed above is being filed under seal with the Commission as Appendix A on a confidential basis to keep the competitive business information in those documents confidential.

COM \_\_\_\_\_  
AFD 2  
APA \_\_\_\_\_  
ECO 2  
ENG 2+Redacted  
GCL 1  
IDM \_\_\_\_\_  
TEL \_\_\_\_\_  
CLK \_\_\_\_\_

With respect to the confidential information contained in the response to Staff's discovery requests, DEF filed its Notice of Intent to Request Confidential Classification on March 25, 2015 (Document No. 01659-15). Pursuant to Rule 25-22.006(3), Florida Administrative Code, this request is timely. DEF hereby submits the following in support of its

confidentiality request.

### **BASIS FOR CONFIDENTIAL CLASSIFICATION**

Section 366.093(1), Florida Statutes, provides that “any records received by the Commission which are shown and found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from [the Public Records Act].” § 366.093(1), Fla. Stat. Proprietary confidential business information means information that is (i) intended to be and is treated as private confidential information by the Company, (ii) because disclosure of the information would cause harm, (iii) either to the Company’s ratepayers or the Company’s business operation, and (iv) the information has not been voluntarily disclosed to the public. § 366.093(3), Fla. Stat. Specifically, “information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms” is defined as proprietary confidential business information. § 366.093(3)(d), Fla. Stat. Additionally, subsection 366.093(3)(e) defines “information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information,” as proprietary confidential business information. Subsection 366.093(3)(a) also states that information relating to “trade secrets” qualifies as proprietary confidential business information.

DEF is requesting confidential classification of the responses to Staff’s First Set of Interrogatories Nos. 6, 7, 12, 16, and 26b and First Request for Production of Documents Nos. 1, 2, and 11, specifically as noted above and in the supporting Affidavits of Benjamin M.H. Borsch, Kris G. Edmondson, and Mark E. Landseidel, ¶¶ 3-4, because the responses contain proprietary and confidential competitive business information and contractual data and competitively sensitive commercial information and supplier investor, financial and trade secret data, the disclosure of which would adversely impact DEF’s and its vendors competitive business

interests. Affidavit of Borsch, ¶ 5, Edmondson ¶ 5, Landseidel, ¶ 5. When vendors are submitting proposals to, contracting with, and/or providing information to DEF the Company must be able to assure its vendors that sensitive business information will be kept confidential. Id. Indeed, most of the documents at issue contain confidentiality provisions that prohibit disclosure to third parties. Id. If third parties were made aware of confidential terms and conditions that the Company has with other parties, they may offer DEF less competitive contractual terms and conditions in any future contractual negotiations. Without DEF's measures to maintain the confidentiality of these investor reports, financial data, and proposals and contracts between DEF and these vendors, the Company's efforts to obtain competitive services would be undermined. Affidavits of Borsch, ¶ 6, Edmondson ¶ 6, Landseidel, ¶ 6.

#### **Confidentiality Procedures**

Strict procedures are established and followed to maintain the confidentiality of the terms of all of the confidential documents and information at issue, including restricting access to those persons who need the information and documents to assist the Company. See Affidavits of Borsch, ¶ 7, Edmondson ¶ 7, Landseidel, ¶ 7.

At no time has the Company publicly disclosed the confidential information or documents at issue; DEF has treated and continues to treat the information and documents at issue as confidential. See Affidavits of Borsch, ¶ 8, Edmondson ¶ 8, Landseidel ¶ 8. DEF requests this information be granted confidential treatment by the Commission.

#### **Conclusion**

The competitive, confidential information at issue in this Request fits the statutory definition of proprietary confidential business information under Section 366.093, Florida Statutes, and Rule 25-22.006, F.A.C., and therefore that information should be afforded confidential classification. In support of this motion, DEF has enclosed the following:

(1) A separate, sealed envelope containing one copy of the confidential Appendix A to DEF's Third Request for Confidential Classification which DEF intends to request confidential classification with the appropriate section, pages, or lines containing the confidential information highlighted. **This information should be accorded confidential treatment pending a decision on DEF's Request by the Commission;**

(2) Two copies of the documents with the information for which DEF intends to request confidential classification redacted by section, pages, or lines where appropriate as Appendix B; and,

(3) A justification matrix of the confidential information contained in Appendix A supporting DEF's Request, as Appendix C.

WHEREFORE, DEF respectfully requests that the redacted portions of DEF's response to Staff's First Set of Interrogatories Nos. 6, 7, 12, 16 and 26b and First Request for Production of Documents Nos. 1, 2, and 11 be classified as confidential for the reasons set forth above.

Respectfully submitted this 8<sup>th</sup> day of April, 2015.

John T. Burnett  
Deputy General Counsel  
Dianne M. Triplett  
Associate General Counsel  
DUKE ENERGY FLORIDA, INC.  
Post Office Box 14042  
St. Petersburg, FL 33733-4042  
Telephone: (727) 820-5587  
Facsimile: (727) 820-5519

Blaise N. Gamba  
James Michael Walls  
Florida Bar No. 0706242  
Blaise N. Gamba  
Florida Bar No. 0027942  
CARLTON FIELDS JORDEN BURT, P.A.  
Post Office Box 3239  
Tampa, FL 33601-3239  
Telephone: (813) 223-7000  
Facsimile: (813) 229-4133

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic mail this 8<sup>th</sup> day of April, 2015.

/s/ Blaise N. Gamba

Attorney

Charles Murphy  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
cmurphy@psc.state.fl.us

Charles Rehwinkel  
Deputy Public Counsel  
Erik Sayler  
Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
Phone: (850) 488-9330  
Email: rehwinkel.charles@leg.state.fl.us  
Sayler.erik@leg.state.fl.us

Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301  
Phone: (850) 681-3828  
Fax: (850) 681-8788  
Email: jmoyle@moylelaw.com  
kputnal@moylelaw.com

James W. Brew  
F. Alvin Taylor  
Brickfield Burchette Ritts & Stone, PC  
1025 Thomas Jefferson St NW  
8th FL West Tower  
Washington, DC 20007-5201  
Phone: (202) 342-0800  
Fax: (202) 342-0807  
Email: jbrew@bbrslaw.com  
ataylor@bbrslaw.com

Robert Scheffel Wright  
John T. LaVia, III  
Gardner Law Firm  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
Phone: (850) 385-0070  
Email: Schef@gbwlegal.com  
Jlavia@gbwlegal.com

Shonnie L. Daniel  
Vice President and Deputy General Counsel  
Calpine Construction  
717 Texas Avenue  
Suite 1000  
Houston, TX 77002  
Shonnie.daniels@calpine.com

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination that  
the Osprey Plant Acquisition and,  
alternatively, the Suwannee Simple  
Cycle Project is the most Cost Effective  
Generation Alternative to meet the  
Remaining Need Prior to 2018 for  
Duke Energy Florida, Inc.

---

DOCKET NO. 150043-EI

Duke Energy Florida, Inc.'s  
Third  
Request for Confidential Classification

**EXHIBIT B**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination that the Osprey Plant acquisition or, alternatively, the Suwannee Simple Cycle Project is the most cost effective generation alternative to meet remaining need prior to 2018, by Duke Energy Florida, Inc.

DOCKET NO. 150043-EI

SERVED: MARCH 25, 2015

**REDACTED**

**DUKE ENERGY FLORIDA, INC.'S RESPONSES TO  
STAFF'S FIRST SET OF INTERROGATORIES NOS. (1-30)**

Duke Energy Florida, Inc. ("DEF") responds to Staff's First Set of Interrogatories (Nos. 1-30) as follows:

**OBJECTIONS**

DEF incorporates and restates its Objections to Staff's First Set of Interrogatories Nos. 1-30, filed on March 16, 2015, as if those objections were fully set forth herein.

**INTERROGATORIES**

1. Given that the two alternatives for additional generation are located in different areas of the state and one is not in the DEF territory, for each alternative, please describe the effects on DEF's system in terms of voltage support.

**RESPONSE:**

The two alternatives are for additional generation to the DEF Balancing Area Authority ("BAA"). DEF plans to operate the two alternatives to produce reactive power at levels necessary to maintain a network voltage schedule as specified by the DEF system operator. This operation is needed and intended to provide voltage support to the DEF BAA whenever necessary. Accordingly, there is no different effect on DEF's system between the alternatives irrespective of their location.

6. Please provide the estimated "all-in" cost to have the full and complete output of the Osprey unit available on DEF's system. Please break the costs down into the following components: acquisition of the Osprey CC unit, performance of the necessary transmission system upgrades, and performance of all recommended and required maintenance activities. Please provide these estimates using sensitivities of +/- 10 percent for both maintenance and transmission costs, and include expected completion dates for the transmission upgrades and maintenance activities.

**REDACTED**

**RESPONSE:**

Currently the Osprey unit is under study through the DEF Generator Interconnection Request Study (GISR) process. The Study process will provide a detailed engineering estimate of  $\pm 20\%$  or  $\pm 10\%$  per the customer's election. The complete Study process is expected to be complete by year-end, 2015. Until such time the best costs estimate and schedule is a Transmission Planning Estimate of \$150 million with completion of associated transmission upgrades and associated maintenance activities by May 2020.

Below are costs for the plant acquisition, maintenance and integration costs.

	<u>2017</u>	<u>2018</u>
PLANT ACQUISITION	166,000	
TRANSACTION COSTS		
TOTAL ACQUISITION COST		
INVENTORY		
CAPITAL MAJOR MAINTENANCE COSTS		
VOM		
FOM		
O&M		
INTEGRATION		
PLANT CONDITION ALIGNMENT VOM		
PLANT CONDITION ALIGNMENT CAPITAL		
Integration and Upgrades		



**DEF did not perform a sensitivity on these costs. Simply applying the +/- 10% standard to the O&M costs would provide a range of [REDACTED] in 2018.**

**DEF plans to complete the initial major maintenance cycle for these units, along with alignments to the plant maintenance practices required to conform to DEF maintenance practices in 2017 and 2018.**

**As stated in the testimony of Mr. Scott and Mr. Borsch, DEF expects that the transmission upgrades necessary to fully integrate Osprey into the DEF transmission grid will be complete in 2020.**

7. Please provide a comparison of the purchase cost of the Osprey unit to the estimated total maintenance costs (that DEF is responsible for) that will be required for the Osprey unit's first five full years of operations.

**REDACTED**

**RESPONSE:**

The information provided in the table below reflects the agreed upon purchase price of the Osprey unit and the maintenance costs for the first five years of DEF's ownership period reflected in Witness Edmondson's Exhibit KGE-3.

<b>REDACTED</b>
-----------------

Please see confidential documents bearing Bates Nos. 15LGBRA-STAFFROG1-7-000001 through 15LGBRA-STAFFROG1-7-000005. These documents are subject to DEF's Third Notice of Intent to request confidential classification filed contemporaneously with service of this response.

12. Have the required requests for approval of the purchase of the Osprey unit been filed with FERC and the U.S. Department of Justice? If yes, when was each such request submitted?

**REDACTED**

**RESPONSE:**

The Section 203 application to FERC filing was made on March 13, 2015. DEF and Calpine have requested a ruling on the application on or before July 30, 2015 consistent with the [REDACTED] deadline for restart of the Suwannee project, if needed.

The required filing to the Department of Justice under the Hart Scott Rodino Act was made on January 30, 2015. The Department of Justice granted early termination of further review of that application on February 27, 2015, effectively granting approval. DEF and Calpine will be required to resubmit this filing within six months of the actual closing, however, DEF does not anticipate that there will be circumstances that would change the result of the early approval.

16. Please identify the purposes and quantify the dollar amounts expended by DEF that are related to the proposed Suwannee Project.

**REDACTED**

**RESPONSE:**

DEF has spent approximately [REDACTED] through February 2015 on the Suwannee Simple Cycle (SC) Project.

Leading up to the PSC hearing held in August 2014 DEF had developed and advanced the project as necessary to support the proposed June 2016 commercial operation date (COD). At the hearing DEF proposed an alternative (Osprey) to the Suwannee SC Project and further work on the project was suspended as much as practical, effectively deferring the project by one year with a revised June 2017 COD as a proposed back-up to the Osprey alternative. If needed for a 2017 COD the Suwannee SC Project work, including major contracts, will need to be re-started in [REDACTED].

[REDACTED]

The EpC contract was suspended in September 2014 and approximately [REDACTED] was paid to the contractor for costs expended to date at that time.

The Generator Step-Up Transformer (GSU) supply contract was suspended in September 2014 and approximately [REDACTED] was spent as payment to the supplier.

Owner's Engineer and other outside consultants have been paid approximately [REDACTED] for preliminary engineering, site studies and legal expenses.

Land purchases required for access and buffer area cost approximately [REDACTED].

Other project development labor, expenses and miscellaneous costs total approximately [REDACTED].

Finally, AFUDC to date cost is approximately [REDACTED].

These costs total approximately [REDACTED] as noted above. Please also see DEF's Response to Staff's First Request of Production of Documents Number 2.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for determination that the Osprey Plant acquisition or, alternatively, the Suwannee Simple Cycle Project is the most cost effective generation alternative to meet remaining need prior to 2018, by Duke Energy Florida, Inc.

DOCKET NO. 150043-EI

SERVED: March 25, 2015

**REDACTED**

**DUKE ENERGY FLORIDA, INC.'S RESPONSE TO  
STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-13)**

Duke Energy Florida, Inc. ("DEF") responds to Staff's First Request for Production of Documents (Nos. 1-13) as follows:

**OBJECTIONS**

DEF incorporates and restates its Objections to Staff's First Request for Production of Documents Nos. 1-13, filed on March 16, 2015, as if those objections were fully set forth herein.

**DOCUMENTS REQUESTED**

1. Please provide copies of any and all documentation showing the schedule and substance of the manufacturer's recommended maintenance for the Osprey unit.

**RESPONSE:**

The confidential Siemens documents attached in Bates range 15LGBRA-STAFFPOD1-1-000001 through 15LGBRA-STAFFPOD1-1-000021 provide maintenance planning programs for generic Siemens combustion turbines and steam turbines at a combined cycle unit like the Osprey unit. The maintenance plan proposed for the actual Osprey unit equipment is based primarily on the experience of DEF experts and the specific equipment conditions present at the Osprey facility. The "Calpine\_Pro\_Forma\_Forecast\_102414v0\_CT\_Worksheets.pdf" file includes worksheets used to develop the necessary maintenance capital and O&M projections for the actual combustion turbines at the Osprey facility that are included in Witness Edmondson's Exhibit KGE-3. These documents are subject to DEF's Third Notice of Intent filed contemporaneously with service of this response.

2. Please provide copies of documentation of any and all amounts spent to date in the pursuit of the Suwannee Project.

**REDACTED**

**RESPONSE:**

**Cost Breakdown Table:**

**Suwannee Simple Cycle Project \$ STD Through February 2015**

[REDACTED]	[REDACTED]
Generator Step-Up Transformer Payments	[REDACTED]
EpC Contractor Payments	[REDACTED]
Owner's Engineers	[REDACTED]
Site Studies	[REDACTED]
Legal	[REDACTED]
Land Purchase	[REDACTED]
Project Development Labor	[REDACTED]
Project Development Expenses & Misc.	[REDACTED]
Subtotal	[REDACTED]
AFUDC	[REDACTED]
Total Project Spent to Date	[REDACTED]
Total Project Spent to Date less [REDACTED]	[REDACTED]

See also confidential documents attached bearing Bates Nos. 15LGBRA-STAFFPOD1-2-000001 through 15LGBRA-STAFFPOD1-2-000005. These documents are subject to DEF's Third Notice of Intent filed contemporaneously with service of this response.

3. Regarding the economic parameters in the petition, please provide complete copies of all source documents, reports and analysis that support the selection of the capital structure, the assumed financing rates, the capital structure ratios, the AFUDC rate, and the assumed present worth discount rates.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination that  
the Osprey Plant Acquisition and,  
alternatively, the Suwannee Simple  
Cycle Project is the most Cost Effective  
Generation Alternative to meet the  
Remaining Need Prior to 2018 for  
Duke Energy Florida, Inc.

---

DOCKET NO. 150043-EI

Documents bearing Bates Nos.

15LGBRA-STAFFROG1-7-000001

through

15LGBRA-STAFFROG1-7-000005

are redacted in their entirety

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination that  
the Osprey Plant Acquisition and,  
alternatively, the Suwannee Simple  
Cycle Project is the most Cost Effective  
Generation Alternative to meet the  
Remaining Need Prior to 2018 for  
Duke Energy Florida, Inc.

---

DOCKET NO. 150043-EI

Documents bearing Bates Nos.

15LGBRA-STAFFROG1-26b-000001

through

15LGBRA-STAFFROG1-26b-000003

are redacted in their entirety



**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination that  
the Osprey Plant Acquisition and,  
alternatively, the Suwannee Simple  
Cycle Project is the most Cost Effective  
Generation Alternative to meet the  
Remaining Need Prior to 2018 for  
Duke Energy Florida, Inc.

---

DOCKET NO. 150043-EI

Documents bearing Bates Nos.  
15LGBRA-STAFFPOD1-1-000001  
through  
15LGBRA-STAFFPOD1-1-000021  
are redacted in their entirety

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination that  
the Osprey Plant Acquisition and,  
alternatively, the Suwannee Simple  
Cycle Project is the most Cost Effective  
Generation Alternative to meet the  
Remaining Need Prior to 2018 for  
Duke Energy Florida, Inc.

---

DOCKET NO. 150043-EI

Documents bearing Bates Nos.  
15LGBRA-STAFFPOD1-2-000001  
through  
15LGBRA-STAFFPOD1-2-000005  
are redacted in their entirety

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination that  
the Osprey Plant Acquisition and,  
alternatively, the Suwannee Simple  
Cycle Project is the most Cost Effective  
Generation Alternative to meet the  
Remaining Need Prior to 2018 for  
Duke Energy Florida, Inc.

---

DOCKET NO. 150043-EI

Documents bearing Bates Nos.

15LGBRA-STAFFPOD1-11-000001

through

15LGBRA-STAFFPOD1-11-000157

are redacted in their entirety

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 150043-EI**  
**Third Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
Duke Energy Florida, Inc.'s Responses to Staff's First Set of Interrogatories No. 6	Response Table, all information in 2 <sup>nd</sup> and third columns except first line; second page, 1 <sup>st</sup> paragraph, second line, last seven words	<p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual 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), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Responses to Staff's First Set of Interrogatories No. 7	Response table, all information in 2 <sup>nd</sup> through 6 <sup>th</sup> columns except first line	<p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual 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), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Responses to Staff's First Set of Interrogatories No. 12	Response, 1 <sup>st</sup> paragraph, last line, fourth and fifth words	<p>§366.093(3)(a), Fla. Stat.  The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF or third parties business operations.</p> <p>§366.093(3)(d), Fla. Stat.</p>

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 150043-EI**  
**Third Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>The document portions in question contain confidential contractual 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), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Responses to Staff's First Set of Interrogatories No. 16	Response 1 <sup>st</sup> paragraph, 1 <sup>st</sup> line, fifth and sixth words; 2 <sup>nd</sup> paragraph, last line, last two words; 3 <sup>rd</sup> paragraph in its entirety; 4 <sup>th</sup> paragraph, 1 <sup>st</sup> line, second and third words from end; 5 <sup>th</sup> paragraph, last line, fourth and fifth words; 6 <sup>th</sup> paragraph, 1 <sup>st</sup> line, last two words; 7 <sup>th</sup> paragraph, last two words on line; 8 <sup>th</sup> paragraph, 2 <sup>nd</sup> line in its entirety; 9 <sup>th</sup> paragraph, last two words on line; 10 <sup>th</sup> paragraph, 1 <sup>st</sup> line, fifth and sixth words	<p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual 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), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Responses to Staff's First Request for Production No. 2	Response Table, 1 <sup>st</sup> line following header line in its entirety; all information in 2 <sup>nd</sup> column lines 2 through 12, 13 <sup>th</sup> line, 1 <sup>st</sup> column, last three words, 2 <sup>nd</sup> column in its entirety	<p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual 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), Fla. Stat.  The document portions in question</p>

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 150043-EI**  
**Third Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
Duke Energy Florida, Inc.'s Responses to Staff's First Set of Interrogatories No. 7, Bates Nos. 15LGBRA-STAFFROG1-7-000001 through 15LGBRA-STAFFROG1-7-000005	All pages in their entirety	<p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual 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), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Responses to Staff's First Set of Interrogatories No. 7, Bates Nos. 15LGBRA-STAFFROG1-26b-000001 through 15LGBRA-STAFFROG1-26b-000003	All pages in their entirety	<p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual 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), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Responses to Staff's First Request for Production No.	All pages in their entirety	§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 150043-EI**  
**Third Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
1, Bates Nos. 15LGBRA-STAFFPOD1-1-000001 through 15LGBRA-STAFFPOD1-1-000021		<p>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), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Responses to Staff's First Request for Production No. 2, Bates Nos. 15LGBRA-STAFFPOD1-2-000001 through 15LGBRA-STAFFPOD1-2-000005	All pages in their entirety	<p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual 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), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Responses to Staff's First Request for Production No. 11, Bates Nos. 15LGBRA-STAFFPOD1-11-000001 through 15LGBRA-STAFFPOD1-11-000157	All pages in their entirety	<p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual 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), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which</p>

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 150043-EI**  
**Third Request for Confidential Classification**  
**Confidentiality Justification Matrix**

<b>DOCUMENT</b>	<b>PAGE/LINE/ COLUMN</b>	<b>JUSTIFICATION</b>
		would impair the competitive business of the provider/owner of the information.