



**Matthew R. Bernier**  
Senior Counsel  
Duke Energy Florida, LLC.

August 24, 2017

**VIA ELECTRONIC FILING**

Ms. Carlotta Stauffer, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: *Fuel and purchased power cost recovery clause with generating performance incentive factor; Docket No. 20170001-EI*

Dear Ms. Stauffer:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF"), DEF's Request for Confidential Classification filed in connection with Exhibit \_\_ (CAM-3), to the direct testimony of Christopher A. Menendez. The filing includes the following:

- DEF's Request for Confidential Classification
- Slipsheet for confidential Exhibit A
- Redacted Exhibit B (two copies)
- Exhibit C (justification matrix), and
- Exhibit D (affidavit of Christopher A. Menendez)

DEF's confidential Exhibit A that accompanies the above-referenced filing has been submitted under separate cover.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Respectfully,

*s/Matthew R. Bernier*

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Matthew R. Bernier  
Senior Counsel  
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MRB/mw  
Enclosures

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Fuel and purchased power cost  
recovery clause with generating  
performance incentive factor.

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Docket No. 20170001-EI

Dated: August 24, 2017

**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 its Request for Confidential Classification for the confidential information Exhibit CAM-3, Schedule E-12A, Part 3 and Schedule E12-B, Part 3, to the direct testimony of Christopher A. Menendez, filed in this docket on August 24, 2017. In support of this Request, DEF states:

1. Information contained in Exhibit No. (CAM-3), Schedule E-12A, Part 3, specifically page 1 of 2 and Schedule E12-B, Part 3, page 1 of 1, to the direct testimony of Christopher A. Menendez contain information that is “proprietary confidential business information” under Section 366.093(3), Florida Statutes.

2. The following exhibits are included with this request:

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

3. As indicated in Exhibit C, the information for which DEF requests confidential classification is “proprietary confidential business information” within the meaning of Section 366.093(3), F.S. Specifically, the information at issue relates to contractual cost data pertaining to the sale of Batch 19 Nuclear Fuel and capacity purchases. Pursuant to contracts, DEF is obligated to maintain the confidentiality of this information, and therefore it qualifies for confidential classification. *See* § 366.093(3)(d), F.S.; Affidavit of Christopher A. Menendez at ¶ 4. If DEF cannot assure contracting parties that it can maintain the confidentiality of contractual terms, those parties and other similarly situated parties may forego entering contracts with DEF, which would impair the Company to negotiate contracts on favorable terms. *See* § 366.093(3)(d), F.S.; *See* Affidavit of Christopher A. Menendez at ¶¶ 5-6. 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 at issue relates to the competitive interests of DEF and third parties purchasing DEF’s assets (i.e., Batch 19 Nuclear Fuel), the disclosure of which would impair their competitive businesses. *See* § 366.093(3)(e), F.S.; *See* Affidavit of Christopher A. Menendez at ¶¶ 6-7. Finally, certain information under claim of confidentiality must be

protected because disclosure of that information would allow other parties and the public to compute the confidential information discussed above (e.g., cost subtotals and totals), and therefore that information must be protected from public disclosure in order to protect the contractual information at issue. *See* § 366.093(3)(d) and (e), F.S.; *See* Affidavit of Christopher A. Menendez at ¶ 5. 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.

5. The information identified as Exhibit “A” is intended to be and is treated as confidential by the Company. *See* Affidavit of Christopher A. Menendez at ¶ 8. The information has not been disclosed to the public, and the Company has treated and continues to treat the information at issue as confidential. *See* Affidavit of Christopher A. Menendez at ¶ 8.

6. 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 the Request for Confidential Classification be granted.

Respectfully submitted this 24<sup>th</sup> day of August, 2017.

*s/Matthew R. Bernier*

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**Duke Energy Florida, LLC**  
Docket No.: 20170001-EI  
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 24<sup>th</sup> day of August, 2017 to all parties of record as indicated below.

*s/Matthew R. Bernier*

Attorney

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# **Exhibit A**

**“CONFIDENTIAL”**

**(submitted under separate cover)**

# **Exhibit B**

**REDACTED**

**(two copies)**



REDACTED

	EST Jan-18	EST Feb-18	EST Mar-18	EST Apr-18	EST May-18	EST Jun-18	EST Jul-18	EST Aug-18	EST Sep-18	EST Oct-18	EST Nov-18	EST Dec-18	TOTAL
<b>1 Base Production Level Capacity Costs</b>													
2 Orange Cogen (ORANGECO)	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	63,975,304
3 Orlando Cogen Limited (ORLACOGL)	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	64,341,479
4 Pasco County Resource Recovery (PASCOUNT)	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	22,778,280
5 Pinellas County Resource Recovery (PINCOUNT)	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	54,222,210
6 Polk Power Partners, L.P. (MULBERRY/ROYSTER)	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	87,852,791
7 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	9,611,349
8 US EcoGen	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Subtotal - Base Level Capacity Costs	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	302,781,413
10 Base Production Jurisdictional Responsibility	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	
11 Base Level Jurisdictional Capacity Costs	23,436,543	23,436,542	23,436,542	23,436,542	23,436,542	23,436,543	23,436,543	23,436,543	23,436,543	23,436,543	23,436,543	23,436,543	281,238,512
<b>12 Intermediate Production Level Capacity Costs</b>													
13 Southern Franklin	5,336,180	5,336,180	2,087,647	2,087,647	2,387,931	6,832,265	10,376,483	10,376,483	5,392,427	2,097,412	2,097,412	3,177,291	57,585,355
14 Schedule H Capacity Sales - NSB	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Subtotal - Intermediate Level Capacity Costs	5,336,180	5,336,180	2,087,647	2,087,647	2,387,931	6,832,265	10,376,483	10,376,483	5,392,427	2,097,412	2,097,412	3,177,291	57,585,355
16 Intermediate Production Jurisdictional Responsibility	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	
17 Intermediate Level Jurisdictional Capacity Costs	3,879,563	3,879,563	1,517,782	1,517,782	1,736,099	4,967,262	7,544,014	7,544,014	3,920,456	1,524,881	1,524,881	2,309,986	41,866,282
<b>18 Peaking Production Level Capacity Costs</b>													
19 Shady Hills	1,955,104	1,955,104	1,396,503	1,354,816	1,896,743	3,856,015	3,856,015	3,856,015	1,799,474	1,354,816	1,354,816	1,955,104	26,590,525
20 Vandolah (NSG)	2,772,661	2,788,227	1,998,461	1,976,224	2,694,834	5,556,300	5,539,623	5,495,150	2,629,977	1,937,310	1,981,783	2,788,227	38,158,778
21 Other	-	-	-	-	-	-	-	-	-	-	-	-	-
22 Subtotal - Peaking Level Capacity Costs	4,727,765	4,743,331	3,394,963	3,331,040	4,591,576	9,412,315	9,395,638	9,351,165	4,429,451	3,292,126	3,336,599	4,743,331	64,749,302
23 Peaking Production Jurisdictional Responsibility	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	
24 Peaking Level Jurisdictional Capacity Costs	4,535,062	4,549,993	3,256,585	3,195,267	4,404,424	9,028,669	9,012,672	8,970,012	4,248,907	3,157,939	3,200,600	4,549,993	62,110,121
<b>25 Other Capacity Costs</b>													
26 Retail Wheeling													
27 RRSA Second Amendment <sup>1</sup>													
28 Total Other Capacity Costs													
<b>29 Total Capacity Costs (line 11+17+24+28)</b>	33,503,029	33,508,605	29,836,423	29,786,116	31,206,401	39,054,470	41,614,985	41,579,074	33,217,208	29,728,343	29,779,024	31,907,807	404,721,485
30 Actual/Estimated True-Up Provision - Jan - Dec 2017													5,121,339
<b>31 Total Capacity Costs w/ True-Up</b>													409,842,825
32 Revenue Tax Multiplier													1.00072
<b>33 Total Recoverable Capacity Costs</b>													410,137,911
<b>34 Nuclear Cost Recovery Clause</b>													131,455,028
35 Revenue Tax Multiplier													1.00072
<b>36 Total Recoverable Nuclear Costs</b>													131,549,676
<b>37 ISFSI Revenue Requirement <sup>2</sup></b>													9,308,657
38 Revenue Tax Multiplier													1.00072
<b>39 Total Recoverable ISFSI Costs</b>													9,315,359
<b>40 Total Recov Capacity &amp; Nuclear Costs (line 33+36+39)</b>													551,002,946

<sup>1</sup> Approved in Commission Order No. PSC-2016-0138-FOF-EI

<sup>2</sup> Approved in Commission Order No. PSC-2016-0425-PAA-EI

	ACT Jan-17	ACT Feb-17	ACT Mar-17	ACT Apr-17	ACT May-17	ACT Jun-17	EST Jul-17	EST Aug-17	EST Sep-17	EST Oct-17	EST Nov-17	EST Dec-17	TOTAL
<b>1 Base Production Level Capacity Costs</b>													
2 Orange Cogen (ORANGE CO)	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	60,858,764
3 Orlando Cogen Limited (ORLACOGL)	5,102,804	5,102,804	5,102,804	5,102,804	5,089,383	5,094,138	5,102,803	5,102,803	5,102,803	5,102,803	5,102,803	5,102,803	61,211,555
4 Pasco County Resource Recovery (PASCOUNT)	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	21,417,600
5 Pinellas County Resource Recovery (PINCOUNT)	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	50,983,200
6 Polk Power Partners, L.P. (MULBERRY/ROYSTER)	6,733,888	6,656,139	6,675,150	6,669,159	6,662,563	6,900,122	6,965,674	6,965,674	6,965,674	6,965,674	6,965,674	6,965,674	82,091,068
7 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	1,097,143	646,573	648,924	678,961	684,116	705,834	800,946	800,946	800,946	800,946	800,946	800,946	9,267,226
8 US EcoGen	-	-	-	(3,000)	(90,000)	(93,000)	-	-	-	-	-	-	(186,000)
9 Calpine Osprey	92,394	-	-	-	-	-	-	-	-	-	-	-	92,394
10 Subtotal - Base Level Capacity Costs	24,131,193	23,510,479	23,531,842	23,552,887	23,451,026	23,712,058	23,974,387	23,974,387	23,974,387	23,974,387	23,974,387	23,974,387	285,735,807
11 Base Production Jurisdictional Responsibility	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	
12 Base Level Jurisdictional Capacity Costs	22,414,258	21,837,709	21,857,551	21,877,099	21,782,485	22,024,945	22,268,609	22,268,609	22,268,609	22,268,609	22,268,609	22,268,609	265,405,704
<b>13 Intermediate Production Level Capacity Costs</b>													
14 Southern Franklin	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,260,918	6,260,918	4,623,002	2,712,100	2,712,100	3,531,058	49,572,645
15 Schedule H Capacity Sales - NSB & RCID	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Subtotal - Intermediate Level Capacity Costs	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,260,918	6,260,918	4,623,002	2,712,100	2,712,100	3,531,058	49,572,645
17 Intermediate Production Jurisdictional Responsibility	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	
18 Intermediate Level Jurisdictional Capacity Costs	3,261,098	3,366,345	1,943,775	1,940,776	2,148,965	4,404,288	4,551,875	4,551,875	3,361,061	1,971,778	1,971,778	2,567,185	36,040,800
<b>19 Peaking Production Level Capacity Costs</b>													
20 Shady Hills	1,954,260	1,954,260	1,395,900	1,374,300	1,924,020	3,912,300	3,856,015	3,856,015	1,799,474	1,354,816	1,354,816	1,955,104	26,691,280
21 Vandolah (NSG)	2,924,309	2,889,528	1,965,274	1,943,845	2,795,467	5,785,430	5,539,623	5,495,150	2,629,977	1,937,310	1,981,783	2,788,227	38,675,923
22 Other	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Subtotal - Peaking Level Capacity Costs	4,878,569	4,843,788	3,361,174	3,318,145	4,719,487	9,697,730	9,395,638	9,351,165	4,429,451	3,292,126	3,336,599	4,743,331	65,367,203
24 Peaking Production Jurisdictional Responsibility	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	
25 Peaking Level Jurisdictional Capacity Costs	4,679,718	4,646,355	3,224,173	3,182,897	4,527,121	9,302,450	9,012,672	8,970,012	4,248,907	3,157,939	3,200,600	4,549,993	62,702,836
<b>26 Other Capacity Costs</b>													
27 Retail Wheeling	(23,615)	(2,605)	(13,552)	(1,023)	(49,903)	(27)	(24,689)	(20,202)	(4,376)	(2,342)	(12,596)	(17,124)	(172,054)
28 RRSSA Second Amendment <sup>1</sup>													
29 Batch-19 Nuclear Fuel <sup>2</sup>													
30 ASC Servicing Fees <sup>3</sup>							(296,269)						(296,269)
31 Total Other Capacity Costs	1,768,743	1,785,790	1,770,879	1,779,445	1,726,601	1,772,514	1,447,620	1,744,413	1,756,275	1,754,346	1,740,128	1,674,699	20,721,452
<b>32 Total Capacity Costs (Line 12+18+25+31)</b>	<b>32,123,817</b>	<b>31,636,198</b>	<b>28,796,378</b>	<b>28,780,217</b>	<b>30,185,172</b>	<b>37,504,198</b>	<b>37,280,776</b>	<b>37,534,909</b>	<b>31,634,852</b>	<b>29,152,673</b>	<b>29,181,116</b>	<b>31,060,486</b>	<b>384,870,792</b>
<b>33 Nuclear Cost Recovery Clause</b>													
34 Levy Costs	-	-	-	-	-	-	-	-	-	-	-	-	-
35 CR3 Uprate Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
36 Total Recoverable Nuclear Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
37													
38 ISFSI Revenue Requirement <sup>4</sup>	-	-	-	-	-	-	697,042	710,787	766,141	770,260	771,297	772,653	4,488,180
39													
<b>40 Total Recov Capacity &amp; Nuclear Costs (Line 32+36+38)</b>	<b>36,583,010</b>	<b>36,067,968</b>	<b>33,200,724</b>	<b>33,157,137</b>	<b>34,534,669</b>	<b>41,826,271</b>	<b>42,272,467</b>	<b>42,512,921</b>	<b>36,640,795</b>	<b>34,135,309</b>	<b>34,137,366</b>	<b>35,990,669</b>	<b>441,059,305</b>
<b>41 Capacity Revenues</b>													
42 Capacity Cost Recovery Revenues (net of tax)	28,519,282	29,627,699	28,061,262	31,308,667	35,187,257	38,498,070	41,005,606	42,944,849	41,950,646	38,649,455	32,526,800	30,799,664	419,079,255
43 Prior Period True-Up Provision Over/(Under) Recovery	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	14,665,234
44 Current Period Revenues (net of tax)	29,741,384	30,849,802	29,283,365	32,530,770	36,409,359	39,720,172	42,227,709	44,166,952	43,172,749	39,871,557	33,748,903	32,021,766	433,744,489
<b>45 True-Up Provision</b>													
46 True-Up Provision - Over/(Under) Recov (Line 44-40)	(6,841,625)	(5,218,166)	(3,917,359)	(626,366)	1,874,691	(2,106,099)	(44,758)	1,654,030	6,531,954	5,736,248	(388,463)	(3,968,903)	(7,314,816)
47 Interest Provision for the Month	7,805	3,244	(128)	(2,766)	(3,217)	(4,786)	(3,641)	(3,459)	(1,203)	715	31	(2,175)	(9,581)
48 Current Cycle Balance - Over/(Under)	(6,833,820)	(12,048,743)	(15,966,230)	(16,595,363)	(14,723,889)	(16,834,773)	(16,883,172)	(15,232,600)	(8,701,850)	(2,964,887)	(3,353,319)	(7,324,397)	(7,324,397)
49 Prior Period Balance - Over/(Under) Recovered	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292
50 Prior Period Cumulative True-Up Collected/(Refunded)	(1,222,103)	(2,444,206)	(3,666,309)	(4,888,411)	(6,110,514)	(7,332,617)	(8,554,720)	(9,776,823)	(10,998,926)	(12,221,028)	(13,443,131)	(14,665,234)	(14,665,234)
51 Prior Period True-up Balance - Over/(Under)	15,646,189	14,424,086	13,201,983	11,979,880	10,757,777	9,535,675	8,313,572	7,091,469	5,869,366	4,647,263	3,425,160	2,203,058	2,203,058
<b>52 Net Capacity True-up Over/(Under) (Line 48+51)</b>	<b>\$8,812,368</b>	<b>\$2,375,343</b>	<b>(\$2,764,247)</b>	<b>(\$4,615,482)</b>	<b>(\$3,966,111)</b>	<b>(\$7,299,099)</b>	<b>(\$8,569,600)</b>	<b>(\$8,141,131)</b>	<b>(\$2,832,483)</b>	<b>\$1,682,376</b>	<b>\$71,841</b>	<b>(\$5,121,339)</b>	<b>(\$5,121,339)</b>

<sup>1</sup> Approved in Commission Order No. PSC-2016-0138-FOF-EI  
<sup>2</sup> Approved in Commission Order No. PSC-2015-0465-S-EI  
<sup>3</sup> Approved in Commission Order No. PSC-2015-0537-FOF-EI  
<sup>4</sup> Approved in Commission Order No. PSC-2016-0425-PAA-EI

REDACTED

	EST Jan-18	EST Feb-18	EST Mar-18	EST Apr-18	EST May-18	EST Jun-18	EST Jul-18	EST Aug-18	EST Sep-18	EST Oct-18	EST Nov-18	EST Dec-18	TOTAL
<b>1 Base Production Level Capacity Costs</b>													
2 Orange Cogen (ORANGECO)	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	5,331,275	63,975,304
3 Orlando Cogen Limited (ORLACOGL)	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	5,361,790	64,341,479
4 Pasco County Resource Recovery (PASCOUNT)	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	1,898,190	22,778,280
5 Pinellas County Resource Recovery (PINCOUNT)	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	4,518,518	54,222,210
6 Polk Power Partners, L.P. (MULBERRY/ROYSTER)	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	7,321,066	87,852,791
7 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	800,946	9,611,349
8 US EcoGen	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Subtotal - Base Level Capacity Costs	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	25,231,784	302,781,413
10 Base Production Jurisdictional Responsibility	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	
11 Base Level Jurisdictional Capacity Costs	23,436,543	23,436,542	23,436,542	23,436,542	23,436,542	23,436,543	23,436,543	23,436,543	23,436,543	23,436,543	23,436,543	23,436,543	281,238,512
<b>12 Intermediate Production Level Capacity Costs</b>													
13 Southern Franklin	5,336,180	5,336,180	2,087,647	2,087,647	2,387,931	6,832,265	10,376,483	10,376,483	5,392,427	2,097,412	2,097,412	3,177,291	57,585,355
14 Schedule H Capacity Sales - NSB	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Subtotal - Intermediate Level Capacity Costs	5,336,180	5,336,180	2,087,647	2,087,647	2,387,931	6,832,265	10,376,483	10,376,483	5,392,427	2,097,412	2,097,412	3,177,291	57,585,355
16 Intermediate Production Jurisdictional Responsibility	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	
17 Intermediate Level Jurisdictional Capacity Costs	3,879,563	3,879,563	1,517,782	1,517,782	1,736,099	4,967,262	7,544,014	7,544,014	3,920,456	1,524,881	1,524,881	2,309,986	41,866,282
<b>18 Peaking Production Level Capacity Costs</b>													
19 Shady Hills	1,955,104	1,955,104	1,396,503	1,354,816	1,896,743	3,856,015	3,856,015	3,856,015	1,799,474	1,354,816	1,354,816	1,955,104	26,590,525
20 Vandolah (NSG)	2,772,661	2,788,227	1,998,461	1,976,224	2,694,834	5,556,300	5,539,623	5,495,150	2,629,977	1,937,310	1,981,783	2,788,227	38,158,778
21 Other	-	-	-	-	-	-	-	-	-	-	-	-	-
22 Subtotal - Peaking Level Capacity Costs	4,727,765	4,743,331	3,394,963	3,331,040	4,591,576	9,412,315	9,395,638	9,351,165	4,429,451	3,292,126	3,336,599	4,743,331	64,749,302
23 Peaking Production Jurisdictional Responsibility	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	
24 Peaking Level Jurisdictional Capacity Costs	4,535,062	4,549,993	3,256,585	3,195,267	4,404,424	9,028,669	9,012,672	8,970,012	4,248,907	3,157,939	3,200,600	4,549,993	62,110,121
<b>25 Other Capacity Costs</b>													
26 Retail Wheeling													
27 RRSA Second Amendment <sup>1</sup>													
28 Total Other Capacity Costs													
<b>29 Total Capacity Costs (line 11+17+24+28)</b>	33,503,029	33,508,605	29,836,423	29,786,116	31,206,401	39,054,470	41,614,985	41,579,074	33,217,208	29,728,343	29,779,024	31,907,807	404,721,485
30 Actual/Estimated True-Up Provision - Jan - Dec 2017													5,121,339
<b>31 Total Capacity Costs w/ True-Up</b>													409,842,825
32 Revenue Tax Multiplier													1.00072
<b>33 Total Recoverable Capacity Costs</b>													410,137,911
<b>34 Nuclear Cost Recovery Clause</b>													131,455,028
35 Revenue Tax Multiplier													1.00072
<b>36 Total Recoverable Nuclear Costs</b>													131,549,676
<b>37 ISFSI Revenue Requirement <sup>2</sup></b>													9,308,657
38 Revenue Tax Multiplier													1.00072
<b>39 Total Recoverable ISFSI Costs</b>													9,315,359
<b>40 Total Recov Capacity &amp; Nuclear Costs (line 33+36+39)</b>													551,002,946

<sup>1</sup> Approved in Commission Order No. PSC-2016-0138-FOF-EI

<sup>2</sup> Approved in Commission Order No. PSC-2016-0425-PAA-EI

	ACT Jan-17	ACT Feb-17	ACT Mar-17	ACT Apr-17	ACT May-17	ACT Jun-17	EST Jul-17	EST Aug-17	EST Sep-17	EST Oct-17	EST Nov-17	EST Dec-17	TOTAL
<b>1 Base Production Level Capacity Costs</b>													
2 Orange Cogen (ORANGE CO)	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	5,071,564	60,858,764
3 Orlando Cogen Limited (ORLACOGL)	5,102,804	5,102,804	5,102,804	5,102,804	5,089,383	5,094,138	5,102,803	5,102,803	5,102,803	5,102,803	5,102,803	5,102,803	61,211,555
4 Pasco County Resource Recovery (PASCOUNT)	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	1,784,800	21,417,600
5 Pinellas County Resource Recovery (PINCOUNT)	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	4,248,600	50,983,200
6 Polk Power Partners, L.P. (MULBERRY/ROYSTER)	6,733,888	6,656,139	6,675,150	6,669,159	6,662,563	6,900,122	6,965,674	6,965,674	6,965,674	6,965,674	6,965,674	6,965,674	82,091,068
7 Wheelabrator Ridge Energy, Inc. (RIDGEGEN)	1,097,143	646,573	648,924	678,961	684,116	705,834	800,946	800,946	800,946	800,946	800,946	800,946	9,267,226
8 US EcoGen	-	-	-	(3,000)	(90,000)	(93,000)	-	-	-	-	-	-	(186,000)
9 Calpine Osprey	92,394	-	-	-	-	-	-	-	-	-	-	-	92,394
10 Subtotal - Base Level Capacity Costs	24,131,193	23,510,479	23,531,842	23,552,887	23,451,026	23,712,058	23,974,387	23,974,387	23,974,387	23,974,387	23,974,387	23,974,387	285,735,807
11 Base Production Jurisdictional Responsibility	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	92.885%	
12 Base Level Jurisdictional Capacity Costs	22,414,258	21,837,709	21,857,551	21,877,099	21,782,485	22,024,945	22,268,609	22,268,609	22,268,609	22,268,609	22,268,609	22,268,609	265,405,704
<b>13 Intermediate Production Level Capacity Costs</b>													
14 Southern Franklin	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,260,918	6,260,918	4,623,002	2,712,100	2,712,100	3,531,058	49,572,645
15 Schedule H Capacity Sales - NSB & RCID	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Subtotal - Intermediate Level Capacity Costs	4,485,507	4,630,269	2,673,583	2,669,458	2,955,813	6,057,918	6,260,918	6,260,918	4,623,002	2,712,100	2,712,100	3,531,058	49,572,645
17 Intermediate Production Jurisdictional Responsibility	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	72.703%	
18 Intermediate Level Jurisdictional Capacity Costs	3,261,098	3,366,345	1,943,775	1,940,776	2,148,965	4,404,288	4,551,875	4,551,875	3,361,061	1,971,778	1,971,778	2,567,185	36,040,800
<b>19 Peaking Production Level Capacity Costs</b>													
20 Shady Hills	1,954,260	1,954,260	1,395,900	1,374,300	1,924,020	3,912,300	3,856,015	3,856,015	1,799,474	1,354,816	1,354,816	1,955,104	26,691,280
21 Vandolah (NSG)	2,924,309	2,889,528	1,965,274	1,943,845	2,795,467	5,785,430	5,539,623	5,495,150	2,629,977	1,937,310	1,981,783	2,788,227	38,675,923
22 Other	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Subtotal - Peaking Level Capacity Costs	4,878,569	4,843,788	3,361,174	3,318,145	4,719,487	9,697,730	9,395,638	9,351,165	4,429,451	3,292,126	3,336,599	4,743,331	65,367,203
24 Peaking Production Jurisdictional Responsibility	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	95.924%	
25 Peaking Level Jurisdictional Capacity Costs	4,679,718	4,646,355	3,224,173	3,182,897	4,527,121	9,302,450	9,012,672	8,970,012	4,248,907	3,157,939	3,200,600	4,549,993	62,702,836
<b>26 Other Capacity Costs</b>													
27 Retail Wheeling	(23,615)	(2,605)	(13,552)	(1,023)	(49,903)	(27)	(24,689)	(20,202)	(4,376)	(2,342)	(12,596)	(17,124)	(172,054)
28 RRSSA Second Amendment <sup>1</sup>													
29 Batch-19 Nuclear Fuel <sup>2</sup>													
30 ASC Servicing Fees <sup>3</sup>							(296,269)						(296,269)
31 Total Other Capacity Costs	1,768,743	1,785,790	1,770,879	1,779,445	1,726,601	1,772,514	1,447,620	1,744,413	1,756,275	1,754,346	1,740,128	1,674,699	20,721,452
<b>32 Total Capacity Costs (Line 12+18+25+31)</b>	<b>32,123,817</b>	<b>31,636,198</b>	<b>28,796,378</b>	<b>28,780,217</b>	<b>30,185,172</b>	<b>37,504,198</b>	<b>37,280,776</b>	<b>37,534,909</b>	<b>31,634,852</b>	<b>29,152,673</b>	<b>29,181,116</b>	<b>31,060,486</b>	<b>384,870,792</b>
<b>33 Nuclear Cost Recovery Clause</b>													
34 Levy Costs	-	-	-	-	-	-	-	-	-	-	-	-	-
35 CR3 Uprate Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
36 Total Recoverable Nuclear Costs	4,459,192	4,431,769	4,404,346	4,376,920	4,349,497	4,322,073	4,294,649	4,267,226	4,239,801	4,212,377	4,184,953	4,157,530	51,700,333
37													
38 ISFSI Revenue Requirement <sup>4</sup>	-	-	-	-	-	-	697,042	710,787	766,141	770,260	771,297	772,653	4,488,180
39													
<b>40 Total Recov Capacity &amp; Nuclear Costs (Line 32+36+38)</b>	<b>36,583,010</b>	<b>36,067,968</b>	<b>33,200,724</b>	<b>33,157,137</b>	<b>34,534,669</b>	<b>41,826,271</b>	<b>42,272,467</b>	<b>42,512,921</b>	<b>36,640,795</b>	<b>34,135,309</b>	<b>34,137,366</b>	<b>35,990,669</b>	<b>441,059,305</b>
<b>41 Capacity Revenues</b>													
42 Capacity Cost Recovery Revenues (net of tax)	28,519,282	29,627,699	28,061,262	31,308,667	35,187,257	38,498,070	41,005,606	42,944,849	41,950,646	38,649,455	32,526,800	30,799,664	419,079,255
43 Prior Period True-Up Provision Over/(Under) Recovery	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	1,222,103	14,665,234
44 Current Period Revenues (net of tax)	29,741,384	30,849,802	29,283,365	32,530,770	36,409,359	39,720,172	42,227,709	44,166,952	43,172,749	39,871,557	33,748,903	32,021,766	433,744,489
<b>45 True-Up Provision</b>													
46 True-Up Provision - Over/(Under) Recov (Line 44-40)	(6,841,625)	(5,218,166)	(3,917,359)	(626,366)	1,874,691	(2,106,099)	(44,758)	1,654,030	6,531,954	5,736,248	(388,463)	(3,968,903)	(7,314,816)
47 Interest Provision for the Month	7,805	3,244	(128)	(2,766)	(3,217)	(4,786)	(3,641)	(3,459)	(1,203)	715	31	(2,175)	(9,581)
48 Current Cycle Balance - Over/(Under)	(6,833,820)	(12,048,743)	(15,966,230)	(16,595,363)	(14,723,889)	(16,834,773)	(16,883,172)	(15,232,600)	(8,701,850)	(2,964,887)	(3,353,319)	(7,324,397)	(7,324,397)
49 Prior Period Balance - Over/(Under) Recovered	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292	16,868,292
50 Prior Period Cumulative True-Up Collected/(Refunded)	(1,222,103)	(2,444,206)	(3,666,309)	(4,888,411)	(6,110,514)	(7,332,617)	(8,554,720)	(9,776,823)	(10,998,926)	(12,221,028)	(13,443,131)	(14,665,234)	(14,665,234)
51 Prior Period True-up Balance - Over/(Under)	15,646,189	14,424,086	13,201,983	11,979,880	10,757,777	9,535,675	8,313,572	7,091,469	5,869,366	4,647,263	3,425,160	2,203,058	2,203,058
<b>52 Net Capacity True-up Over/(Under) (Line 48+51)</b>	<b>\$8,812,368</b>	<b>\$2,375,343</b>	<b>(\$2,764,247)</b>	<b>(\$4,615,482)</b>	<b>(\$3,966,111)</b>	<b>(\$7,299,099)</b>	<b>(\$8,569,600)</b>	<b>(\$8,141,131)</b>	<b>(\$2,832,483)</b>	<b>\$1,682,376</b>	<b>\$71,841</b>	<b>(\$5,121,339)</b>	<b>(\$5,121,339)</b>

<sup>1</sup> Approved in Commission Order No. PSC-2016-0138-FOF-EI  
<sup>2</sup> Approved in Commission Order No. PSC-2015-0465-S-EI  
<sup>3</sup> Approved in Commission Order No. PSC-2015-0537-FOF-EI  
<sup>4</sup> Approved in Commission Order No. PSC-2016-0425-PAA-EI

## Exhibit C

### DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
<p>Exhibit ___(CAM-3), Schedule E12-A, Part 3, Page 1 of 2, to the direct testimony of Christopher A. Menendez</p>	<p><b>Line 26:</b> Retail Wheeling: all costs for January 2018 through the total.</p> <p><b>Line 27:</b> RRSSA Second Amendment: all costs for January 2018 through the total.</p> <p><b>Line 28:</b> Total Other Capacity Costs: all costs for January 2018 through the total.</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)€ 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>
DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
<p>Exhibit ___(CAM-3), Schedule E12-B, Part 3, Page 1 of 1, to the direct testimony of Christopher A. Menendez</p>	<p><b>Line 29:</b> Batch 19 Nuclear Fuel: all costs for January 2017 through December 2017 to include the total.</p> <p><b>Line 30:</b> ASC Servicing Fees: all costs for January 2017 through the total.</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)€ 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**  
**CHRISTOPHER A.**  
**MENENDEZ**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Fuel and purchased power cost  
recovery clause with generating  
performance incentive factor

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Docket No. 20170001-EI

Dated: August 24, 2017

**AFFIDAVIT OF CHRISTOPHER A. MENENDEZ IN SUPPORT OF  
DUKE ENERGY FLORIDA'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Christopher A. Menendez, who being first duly sworn, on oath deposes and says that:

1. My name is Christopher A. Menendez. 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 Rates and Regulatory Strategy Manager within the Rates and Regulatory Strategy Department. This department is responsible for regulatory planning and cost recovery for DEF.

3. As the Rates and Regulatory Strategy Manager, I am responsible, along with the other members of the section, for the production and review of the regulatory

financial reports of DEF and analysis of state, federal and local regulations and their impact on DEF.

4. DEF is seeking confidential classification for certain information contained in Exhibit No. \_\_\_\_ (CAM-3), Schedule E-12A, Part 3, specifically page 1 of 2, and Schedule E-12B, Part 3, page 1 of 1, to my direct testimony filed on August 24, 2017 in this docket. The confidential information at issue is contained in confidential Exhibit A to DEF's Request 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 competitively sensitive confidential business information of capacity suppliers and nuclear fuel buyers, DEF contracts with.

5. DEF negotiates with potential capacity suppliers to obtain competitive contracts for capacity purchase options that provide economic value and system reliability to DEF and its customers. In order to obtain such contracts, however, DEF must be able to assure suppliers that sensitive business information will be kept confidential. DEF enters into contracts that require the information will be protected from disclosure. In order to protect this confidential information, it is also necessary to keep additional information that could be used to compute the confidential information at issue if made public; for example, if costs relating to one contract were held confidential but all other contractual costs and the resulting subtotal were public, the confidential information would become apparent. For this reason, DEF has held confidential the information on the subject exhibits that could be used to compute to the confidential information in need of protection.



6. Additionally, DEF negotiates with potential nuclear fuel buyers to obtain competitive contracts to sell the CR3 nuclear fuel that in turn, provides economic value to DEF and its customers. In order to obtain such contracts, however, DEF must be able to assure companies purchasing nuclear fuel that sensitive business information will be kept confidential. With respect to the information at issue in this request, DEF has kept confidential and has not publicly disclosed confidential contract terms or similar competitive information. Without DEF's measures to maintain the confidentiality of sensitive terms in contracts between DEF and capacity suppliers or purchasers of nuclear fuel, the Company's efforts to obtain competitive contracts could be undermined. Furthermore, the disclosure of confidential information could adversely impact DEF's competitive business interests.

7. Absent such measures, suppliers or buyers would run the risk that sensitive business information that they provided in their contracts with DEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who otherwise would contract with DEF might decide not to do so if DEF did not keep those terms confidential. If such information was disclosed to DEF's competitors, DEF's efforts to obtain competitive capacity purchase 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.


8. Upon receipt of confidential information from capacity suppliers, and with 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 or contracts. The Company has treated and continues to treat the information and contracts at issue as confidential.


9. This concludes my affidavit.

Further affiant sayeth not.

Dated the 22 day of August, 2017.

  
\_\_\_\_\_  
(Signature)  
Christopher A. Menendez  
Rates and Regulatory Strategy Manager  
Rates and Regulatory Strategy  
Duke Energy Florida  
299 1<sup>st</sup> Avenue North  
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 22<sup>nd</sup> day of August, 2017, by Christopher A. Menendez. He is personally known to me, or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.

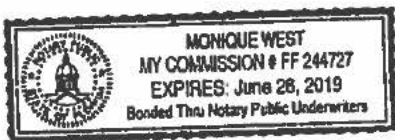
  
\_\_\_\_\_  
(Signature)

Monique West  
\_\_\_\_\_  
(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF FLORIDA

June 28, 2019  
\_\_\_\_\_  
(Commission Expiration Date)



\_\_\_\_\_  
(Serial Number, If Any)