



**Matthew R. Bernier**  
Associate General Counsel  
Duke Energy Florida, LLC.

December 18, 2018

**VIA ELECTRONIC FILING**

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

Re: *Review of Duke Energy Florida's Data Accuracy in Electric Reliability Reporting; Docket No. 20150216-EI*

Dear Ms. Stauffer:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF"), DEF's Second Request for Extension of Confidential Classification concerning certain information contained in Staff's Audit Workpapers, *Audit Control No. PA-15-01-003* pertaining to its Review of DEF's Data Accuracy in Electric Reliability Reporting (document no. 04418-15) filed in docket no. 20150216-EI and Revised Exhibit D, Affidavit of Brian Lloyd. The original Request included Exhibits A, B, and C.

There are no changes to the original Request's Exhibit A consisting of the confidential unredacted documents, Exhibit B containing two (2) redacted copies of the confidential document, or Exhibit C containing a justification table in support of DEF's original Request. The aforementioned exhibits remain on file with the Clerk.

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  
Associate General Counsel

MRB/mw  
Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Review of Duke Energy Florida,  
LLC's Data Accuracy in Electric Reliability  
Reporting

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Docket No. 20150216-EI

Dated: December 18, 2018

**DUKE ENERGY FLORIDA LLC'S  
SECOND REQUEST FOR EXTENSION OF 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 Second Request for Extension of Confidential Classification of certain information contained in Staff's Audit Workpapers, *Audit Control No. PA-15-01-003* pertaining to its Review of DEF's Data Accuracy in Electric Reliability Reporting. In support of this Request, DEF states:

1. On July 15, 2015, DEF filed its Request for Confidential Classification for certain information contained in Staff's Audit Work papers, *Audit Control No. PA-15-01-003* (document no. 04418-15<sup>1</sup>) as it contains confidential proprietary business information. DEF's Request was granted by Order No. PSC-2015-0551-CFO-EI on December 2, 2016.

2. On May 19, 2017, DEF filed its First Request for Extension of Confidential Classification. DEF's First Request for extension was granted by Order No. PSC-2017-0238-CFO-EI, on June 21, 2017. The period of confidential treatment granted by the Order will expire on December 21, 2018. The information granted confidential treatment by Order Nos. PSC-2015-0551-CFO-EI and PSC-2017-0238-CFO-EI continue to warrant treatment as "proprietary

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<sup>1</sup> DEF hereby incorporates Exhibits A, B, and C to the July 15, 2015 Request as if fully set forth herein.

confidential business information” within the meaning of Section 366.093(3), F.S. Accordingly, DEF is filing its Second Request for Extension of Confidential Classification.

3. DEF submits that certain documents and information contained in Staff’s Audit Workpapers, *Audit Control No. PA-15-01-003*, specifically pages 122, 178, 181, 186, and 188 referenced in confidential Exhibit A to the July 15, 2015 Request, continues to be “proprietary confidential business information” within the meaning of section 366.093(3), F.A. and continues to require confidential classification. *See* Affidavit of Brian Lloyd at ¶ 4 attached as Revised Exhibit “D”. This information is intended to be and is treated as confidential by the Company. The information has not been disclosed to the public. Pursuant to section 366.093(1), F.S., such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the Public Records Act. *See* Affidavit of Brian Lloyd ¶ 5.

4. Nothing has changed since the issuance of Order Nos. PSC-2015-0551-CFO-EI and PSC-2017-0238-CFO-EI to render the information stale or public such that continued confidential treatment would not be appropriate. Upon a finding by the Commission that this information continues to be “proprietary confidential business information,” it should continue to be treated as such for an additional period of at least 18 months, and should be returned to DEF as soon as the information is no longer necessary for the Commission to conduct its business. *See* §366.093(4), F.S.

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

Respectfully submitted this 18<sup>th</sup> day of December, 2018.

*s/Matthew R. Bernier*

**DIANNE M. TRIPLETT**

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**Duke Energy Florida, LLC  
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 18<sup>th</sup> day of December, 2018 as indicated below.

*s/Matthew R. Bernier*

Attorney

Adria Harper  
Office of General Counsel  
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# **Exhibit A**

**“CONFIDENTIAL”**  
**(on file)**

# **Exhibit B**

**(on file)**

**DUKE ENERGY FLORIDA  
Confidentiality Justification Matrix**

**(on file)**



**Revised**  
**Exhibit D**  
**AFFIDAVIT OF**  
**BRIAN LLOYD**



and execution of the annual Distribution investment plan, and the compilation of the annual distribution service reliability report for DEF.

4. DEF is seeking a second extension of confidential classification for certain information contained in Staff's Audit workpapers pertaining to the Review of DEF's Data Accuracy in Electric Reliability Reporting, *Audit Control No. PA-15-01-003*, specifically pages 122, 178, 181, 186, and 188 submitted on July 15, 2015 (document no. 04418-15). There are no changes to the information contained in DEF's confidential Exhibit A, redacted Exhibit B, and justification matrix, Exhibit C. The referenced Exhibits are on file with the Clerk. DEF is requesting an extension of confidential classification of this information because it contains sensitive business information, the disclosure of which would impair the Company's efforts to protect internal business information.

5. Additionally, portions of the workpapers reflect DEF's internal audit processes and procedures for its reliability reporting. DEF must ensure that sensitive business information, such as personnel information and internal auditing processes and procedures, will be kept confidential. The disclosure of DEF's internal processes and procedures could adversely impact DEF's ability to control, audit, and evaluate reliability issues. DEF has kept confidential and has not publicly disclosed confidential information such as its procedures for measuring and evaluating the lifecycle of a reliability issue and employee personnel information unrelated to compensation, duties, responsibilities, or qualifications, the disclosure of which could impair the Company's efforts to protect its internal business interests.

6. Strict procedures are established and followed to maintain the confidentiality of the Company's internal policies and procedures, including restricting access to those persons who need the information to assist the Company, and restricting the number of, and access to the information. At no time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

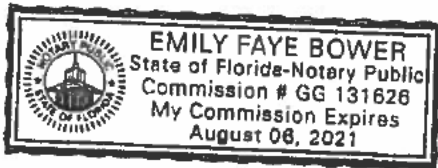
Further affiant sayeth not.

Dated the 14 day of December, 2018.




(Signature)  
Brian Lloyd  
Manager of PQR & I Engineering  
PQR & I Planning Department  
Duke Energy Florida, LLC  
3250 Bonnet Creek Rd  
Lake Buena Vista, FL 32830

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 14<sup>th</sup> day of December, 2018 by Brian Lloyd. He is personally known to me, or has produced his FL driver's license, or his \_\_\_\_\_ as identification.



(AFFIX NOTARIAL SEAL)

  
(Signature)  
Emily Faye Bower  
(Printed Name)  
NOTARY PUBLIC, STATE OF FL  
8/6/21  
(Commission Expiration Date)

(Serial Number, If Any)