



Matthew R. Bernier
ASSOCIATE GENERAL COUNSEL

October 21, 2020

VIA ELECTRONIC MAIL

Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: *Duke Energy Florida, LLC: Undocketed —Financial impacts on utility customers as a result of the COVID-19 pandemic.*

Dear Mr. Teitzman:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC (“DEF”), DEF’s Request for Confidential Classification filed in connection with DEF’s Response to Staff’s Request for financial impacts on utility customers as a result of the COVID-19 pandemic, on September 30, 2020.

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 Lesley Quick)

DEF’s confidential Exhibit A that accompanies the above-referenced filing was filed with DEF’s Notice of Intent to Request Confidential Classification (Document No. 09696-2020), titled as “Attachment B,” and remains on file with the Clerk.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me at (850) 521-1428.

Sincerely,

s/ Matthew R. Bernier

Matthew R. Bernier

MRB/cmw
Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Financial impacts on utility
Customers as a result of the COVID-19
Pandemic

Docket No. Undocketed

Filed: October 21, 2020

**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 provided in DEF’s Response to Staff’s Request for financial impacts on utility customers as a result of the COVID-19 pandemic, filed in the undocketed on September 30, 2020, concurrently filed with DEF’s Notice of Intent to Request Confidential Classification. This Request is timely. *See* Rule 25-22.006(3)(a)1., F.A.C. In support of this Request, DEF states:

1. Information contained in DEF’s Response to Staff’s Request for financial impacts on utility customers as a result of the COVID-19 pandemic. Specifically, the document provided in response to Staff’s request to provide DEF’s current COVID-related policies related to past-due accounts, payment arrangements, late payment waivers, disconnection and reconnection, contains “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 an unredacted copy of the document for which DEF seeks confidential treatment. Composite Exhibit A was submitted separately and labeled “CONFIDENTIAL” on September 30, 2020

(Document No. 09721-2020, titled “Attachment B”). In the unredacted version, 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 attesting to the confidential nature of information identified in this request.

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 in DEF’s response to Staff’s request to provide DEF’s current COVID-related policies related to past-due accounts, payment arrangements, late payment waivers, disconnection and reconnection. DEF is requesting confidential classification of this information because it contains sensitive, current COVID-related internal policies and procedures of the Company, the disclosure of which could impair the efforts of the Company to protect internal business information. *See* § 366.093(3)(c), F.S.; Affidavit of Lesley Quick at ¶¶ 3, 4. 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 as Exhibit “A” is intended to be and is treated

as confidential by the Company. *See* Affidavit of Lesley Quick at ¶ 4, 5. DEF has kept confidential and has not publicly disclosed confidential information such as the current payment arrangement extension terms or current COVID-related internal policies and procedures. *Id.*

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 21st day of October, 2020.

s/Matthew R. Bernier

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Exhibit A

CONFIDENTIAL

**FILED ON SEPTEMBER 30, 2020
UNDER SEPARATE COVER**

Docket No. Undocketed
Duke Energy Florida, LLC
DEF's Response Staff's Request for financial impacts
on utility customers as a result of the COVID-19 pandemic
Titled "Attachment B"

REDACTED

The document titled "Attachment B" is redacted in its entirety.

Docket No. Undocketed
Duke Energy Florida, LLC
DEF's Response Staff's Request for financial impacts
on utility customers as a result of the COVID-19 pandemic
Titled "Attachment B"

REDACTED

The document titled "Attachment B" is redacted in its entirety.

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
DEF's Response to Staff's request to provide DEF's current COVID-related policies related to past-due accounts, payment arrangements, late payment waivers, disconnection and reconnection	The responsive document, titled "Attachment B," is confidential in its entirety.	§366.093(3)(c), F.S. The document in question contains confidential information, the disclosure of which would impair the interests of both DEF and its customers.

Exhibit D

AFFIDAVIT OF LESLEY QUICK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Financial impacts on utility
Customers as a result of the COVID-19
Pandemic

Docket No. Undocketed

Filed: October 21, 2020

**AFFIDAVIT OF LESLEY QUICK IN SUPPORT
OF DUKE ENERGY FLORIDA, LLC's
REQUEST OF CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is Lesley Quick. I am over the age of 18 years old and I have been authorized by Duke Energy Florida, LLC (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 facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Vice President Strategic Planning, Governance & Technology within Customer Services in North Carolina. I am responsible for providing direction and leadership in the development of organizational business plans to ensure alignment and achievement of objectives, regulatory compliance and reporting, key performance indicators and operational metrics. My major duties and responsibilities include the oversight, leadership, integration and implementation of strategic business planning

governance, change management, audit and compliance, technology support, and Consumer Affairs within Customer Services.

3. DEF is seeking confidential classification for certain information contained in the document provided in response to Staff's Request for financial impacts on utility customers as a result of the COVID-19 pandemic. The confidential information at issue is contained in confidential Exhibit A, filed contemporaneously with DEF's Notice of Intent on September 30, 2020 (titled in the NOI as "Attachment B"), and is outlined in DEF's Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this information because it contains confidential information.

DEF is requesting confidential classification of this information because it contains sensitive current COVID-related internal policies and procedures of the Company, the disclosure of which could impair the efforts of the Company to protect internal business information.

4. DEF establishes and maintains internal policies and procedures. DEF must ensure that its sensitive, proprietary business information, such as internal policies and procedures and payment arrangements with customers, will be kept confidential. With respect to the information at issue in this Request, DEF has kept confidential and has not publicly disclosed confidential information such as the payment arrangement extension terms or COVID-related internal policies and procedures. Absent such measures, it could affect customers' behaviors pertaining to payment arrangement programs and how they do business with DEF. Without DEF's measures to maintain the

confidentiality of its COVID-related internal policies and procedures, the Company would impair the interests of both DEF and its customers.

5. Upon receipt of confidential information from customers, and with its own confidential information, strict procedures are established and followed to maintain the confidentiality of the Company's policies and procedures, including restricting access to those persons who need the information to assist the Company and its customers. 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.

6. This concludes my affidavit.

Further affiant sayeth not.

Dated the 21st day of October, 2020.

(Signature)

Lesley Quick

VP Strategic Planning, Governance & Technology

Duke Energy

400 South Tryon

Charlotte, NC 28202

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this ___ day of October, 2020 by Lesley Quick. She is personally known to me, or has produced her _____ driver's license, or her _____ as identification.

(Signature)

(Printed Name)

NOTARY PUBLIC, STATE OF _____

(AFFIX NOTARIAL SEAL)

(Commission Expiration Date)

(Serial Number, If Any)