

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by
Duke Energy Florida, LLC.

Docket No. 20240025-EI

Dated: August 19, 2024

**NOTICE OF FILING VERIFIED AFFIDAVITS IN SUPPORT OF DUKE ENERGY
FLORIDA, LLC'S REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida, LLC, ("DEF") hereby gives notice of filing the verified Affidavits of Hans Jacob and Jeffrey Kopp, in support of DEF's Request for Confidential Classification, submitted on June 4, 2024 (document number 04569-2024), regarding its Response to OPC's Tenth Set of Interrogatories (Nos. 245-276) and Tenth Request for Production of Documents (Nos. 94-105), this 19th day of August, 2024

Respectfully submitted,

/s/ Dianne M. Triplett

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CERTIFICATE OF SERVICE

Docket No. 20240025-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished
by electronic mail this 19th day of August, 2024, to the following:

/s/ Dianne M. Triplett

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC
for rate increase

DOCKET NO. 20240025-EI

Dated: June 25, 2024

**AFFIDAVIT OF HANS JACOB IN SUPPORT OF
DUKE ENERGY FLORIDA, LLC'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Hans Jacob. 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 employed by Duke Energy Corporation as Director of Renewable Business Development.

3. As a Director of Renewable Business Development, I am responsible for the development of battery energy storage systems ("BESS") projects in Florida on behalf of DEF. I lead a team of project developers responsible for the initiation and deployment of regulated battery

energy storage and microgrid systems.

4. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Tenth Set of Interrogatories, Question 268. A detailed description of the confidential information at issue is contained in Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

5. Documents produced in response to OPC's Tenth Set of Interrogatories, Question 268, contain confidential information. Specifically, these documents contain costs associated with DEF's energy storage projects, including pricing relating to contracts for goods and services. Disclosure of this non-public information could alter contractors' behavior to the detriment of DEF, its customers, and its affiliates. Thus, absent confidential classification, DEF and its affiliates' efforts to contract for goods and services on favorable terms may be impaired.

6. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 25th day of June, 2024.

Hans Jacob

(Signature)

Hans Jacob

Director, Renewable Business Development

Duke Energy Corporation

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 25th day of June, 2024 by Hans Jacob. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.

Monique Hampton

(Signature)

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF _____



(Commission Expiration Date)

(Serial Number, If Any)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Duke Energy Florida, LLC
for rate increase

DOCKET NO. 20240025-EI

Dated: June 4, 2024

**AFFIDAVIT OF JEFFREY T. KOPP 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 Jeffrey T. Kopp, who being first duly sworn, on oath deposes and says that:

1. My name is Jeffrey T. Kopp. 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 employed by 1898 & Co., part of Burns & McDonnell Engineering Company, Inc., as the Senior Managing Director of the Energy & Utilities Consulting Department. I oversee more than 250 engineers and consultants who provide consulting services to clients primarily in the electric power generation and electric power transmission industries, but also to other industrial and commercial clients. The services provided by this group of engineers and consultants include

decommissioning cost studies, independent engineering assessments of existing power generation assets, economic evaluations of capital expenditures, new power generation development and evaluation, electric and water rate analysis, electric transmission planning, generation resource planning, renewable power development, and other related engineering and economic assessments.

3. DEF is seeking confidential classification for information contained in response to the Office of the Public Counsel's ("OPC") Tenth Request for Production of Documents, Questions 94, 97, and 98, and OPC's Tenth Set of Interrogatories, Questions 257, 263, and 265. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Confidentiality Justification Matrix that is attached to DEF's Request as Exhibit C. DEF is requesting confidential classification of this confidential information for the reasons set forth below.

4. Documents produced in response to OPC's Tenth Request for Production of Documents, Questions 94, 97, and 98, and OPC's Tenth Set of Interrogatories, Questions 257 and 265, contain confidential information. Specifically, the documents reflect data used to produce a dismantlement study. The study (and the model used to create it) is propriety, and public disclosure would permit competitors to copy it. In addition, the documents reflect DEF's dismantlement costs (to include for labor and other services) and scrap values. Thus, disclosure would impair competition in the marketplace.

5. Documents produced in response to OPC's Tenth Set of Interrogatories, Question 263, contain confidential information. Specifically, the documents contain pricing information relating to leases for real estate. That information relates to DEF's competitive business interests, and, absent confidential classification, disclosure of that information would impair DEF's ability to compete in the marketplace. The documents also contain detailed information about the location

of solar generation projects. Disclosure of that information could pose significant security risk to DEF, its customers, and the transmission grid.

6. Upon receipt of 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 DEF. At no time since receiving the information in question has DEF publicly disclosed that information. DEF has treated and continues to treat the information at issue as confidential.

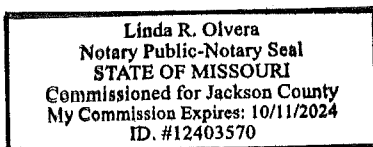
7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 19th day of August, 2024.

Jeffrey T. Kopp
(Signature)
Jeffrey T. Kopp
Senior Managing Director
1898 & Co.

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 19 day of August, 2024 by Jeffrey T. Kopp. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



(AFFIX NOTARIAL SEAL)

Linda R. Olvera
(Signature)
Linda R. Olvera
(Printed Name)
NOTARY PUBLIC, STATE OF Missouri
10/11/2024
(Commission Expiration Date)
12403570
(Serial Number, If Any)