

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for a limited proceeding to approve
Clean Energy Connection Program and Tariff and
Stipulation by Duke Energy Florida, LLC

Docket No. 20200176-EI

Served: November 16, 2020

**DUKE ENERGY FLORIDA, LLC'S
NOTICE OF FILING AND SERVING VERIFIED¹ AFFIDAVITS**

Duke Energy Florida, LLC ("DEF") hereby submits the following attached verified affidavits for the following requests for confidential classification filed by DEF in this proceeding:

1. DEF's Request for Confidential Classification re. LULAC's POD 1 (Nos. 1-8), filed November 3, 2020; and
2. DEF's Request for Confidential Classification re. LULAC's ROG 2 (Nos. 9-25), filed November 4, 2020.

DEF also gives notice that it has served verified affidavits for the following interrogatory responses served by DEF in this proceeding:

1. DEF's Response to LULAC's ROG 1 (Nos. 1-8);
2. DEF's Amended Response to LULAC's ROG 2 (Nos. 9-25);
3. DEF's Response to LULAC's ROG 3 (No. 26);
4. DEF's Response to LULAC's ROG 4 (Nos. 27-32);
5. DEF's Response to Staff's ROG 1 (Nos. 1-3);
6. DEF's Response to Staff's ROG 2 (Nos. 4-26); and
7. DEF's Response to Staff's Amended ROG 3 (Nos. 27-29).

[Signature Page to follow]

¹Due to circumstances with COVID-19, DEF was unable to previously provide verified affidavits for the above-listed filings and discovery responses at the time they were filed and/or served.

/s/ Dianne M. Triplett

DIANNE M. TRIPLETT
Deputy General Counsel
Duke Energy Florida, LLC
299 First Avenue North
St. Petersburg, FL 33701
T: 727.820.4692; F: 727.820.5519
E: Dianne.Triplett@duke-energy.com

MATTHEW R. BERNIER
Associate General Counsel
Duke Energy Florida, LLC
106 East College Avenue, Suite 800
Tallahassee, FL 32301
T: 850.521.1428; F: 727.820.5519
E: Matthew.Bernier@duke-energy.com
FLRegulatoryLegal@duke-energy.com

CERTIFICATE OF SERVICE

Docket No. 20200176-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 16th day of November, 2020.

/s/ Dianne M. Triplett

Attorney

<p>Bianca Lherisson / Shaw Stiller Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 blheriss@psc.state.fl.us sstiller@psc.state.fl.us</p> <p>Bradley Marshall / Jordan Luebke Earthjustice 111 S. Martin Luther King Jr. Blvd. Tallahassee, FL 32301 bmarshall@earthjustice.org jluebke@earthjustice.org</p> <p>Dominique Burkhardt Earthjustice 4500 Biscayne Blvd., Ste. 201 Miami, FL 33137 dburkhardt@earthjustice.org flcaseupdates@earthjustice.org</p> <p>Katie C. Ottenweller 838 Barton Woods Rd., NE Atlanta, GA 30307 katie@votesolar.org</p> <p>George Cavros 120 E. Oakland Park Blvd., Ste. 105 Ft. Lauderdale, FL 33334 george@cavros-law.com</p>	<p>J.R. Kelly / Charles Rehwinkel Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us rehwinkel.charles@leg.state.fl.us</p> <p>Jon C. Moyle, Jr. / Karen A. Putnal 118 N. Gadsden St. Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com mqualls@moylelaw.com</p> <p>Stephanie U. Eaton 110 Oakwood Dr., Ste. 500 Winston-Salem, NC 27103 seaton@spilmanlaw.com</p> <p>Derrick P. Williamson / Barry A. Naum 1100 Bent Creek Blvd., Ste. 101 Mechanicsburg, PA 17050 dwilliamson@spilmanlaw.com bnaum@spilmanlaw.com</p>
---	---

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for a limited proceeding to approve
Clean Energy Connection Program and Tariff and
Stipulation by Duke Energy Florida, LLC

Docket No. 20200176-EI

Filed: November 3, 2020

**AFFIDAVIT OF BENJAMIN BORSCH 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 Benjamin Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin Borsch. 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 Director of IRP & Analytics in DEF's Florida Customer Delivery organization and direct the resource planning process in an integrated approach in order to find the most cost-effective alternatives to meet the Company's obligation to serve its customers in Florida. I also oversee the completion of the Company's Ten-Year Site Plan ("TYSP") filed each April.

3. DEF is seeking confidential classification for certain information contained in DEF's Response to LULAC's First Request for Production of Documents (Nos. 1-8). Specifically, in DEF's response to question numbers 1 and 2, as it contains confidential proprietary business information relating to DEF's budgeted information. The disclosure of that information to the public would adversely impact DEF's competitive interests.

4. Additionally, DEF is seeking confidential classification for certain information contained in DEF's response to questions 3 and 5, as it contains contractual obligations with counterparties, the disclosure of which would violate the contractual obligation between DEF and counterparties that DEF is obligated to keep confidential and would harm its competitive business interest and ability to contract for goods or services on favorable terms. If such information was disclosed to DEF's competitors, DEF's efforts to obtain competitive contracts that add economic value to both DEF and its customers could be undermined.

5. The confidential information at issue is contained in confidential Exhibit A attached to this Request and is outlined in DEF's Justification Matrix that is attached as Exhibit C. DEF is requesting confidential classification of this information because the disclosure of that information to the public would adversely impact DEF's competitive business interests and would harm its competitive business interest and ability to contract for goods or services on favorable terms.

6. Strict procedures are established and followed to maintain the confidentiality of the Company's confidential business information relating to DEF's budgeted information and contractual obligations with counterparties, which includes 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 and counterparties have treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

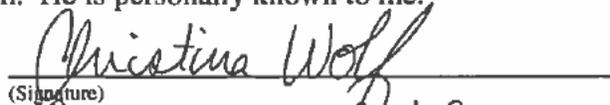
Dated this 13th day of November, 2020.



(Signature)

Benjamin Borsch
Director of IRP & Analytics
Florida Customer Delivery Organization
Duke Energy
299 1st Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 13th day of November, 2020, by Benjamin Borsch. He is personally known to me.



(Signature)

Christina Wolf

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF FLORIDA

9/27/21

(Commission Expiration Date)



CHRISTINA WOLF
Commission # GG 146409
Expires September 27, 2021
Bonded thru Budget Notary Services

(Serial Number, If Any)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for a limited proceeding to approve
Clean Energy Connection Program and Tariff and
Stipulation by Duke Energy Florida, LLC

Docket No. 20200176-EI

Filed: November 4, 2020

**AFFIDAVIT OF BENJAMIN BORSCH 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 Benjamin Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin Borsch. 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 Director of IRP & Analytics in DEF's Florida Customer Delivery organization and direct the resource planning process in an integrated approach in order to find the most cost-effective alternatives to meet the Company's obligation to serve its customers in Florida. I also oversee the completion of the Company's Ten-Year Site Plan ("TYSP") filed each April.

3. DEF is seeking confidential classification for certain information contained in DEF's Response to LULAC's Second Set of Interrogatories (Nos. 9-25). Specifically, in DEF's response to question number 17, as it contains confidential proprietary business information relating to contractual obligations with counterparties, the disclosure of which would violate the contractual obligation between DEF and counterparties, that DEF is obligated to keep confidential, and would harm its competitive business interest and ability to contract for goods or services on favorable terms. If such information was disclosed to DEF's competitors, DEF's efforts to obtain competitive contracts that add economic value to both DEF and its customers could be undermined.

4. The confidential information at issue is contained in confidential Exhibit A attached to this Request and is outlined in DEF's Justification Matrix that is attached as Exhibit C. DEF is requesting confidential classification of this information because the disclosure of that information to the public would adversely impact DEF's competitive business interests and would harm its competitive business interest and ability to contract for goods or services on favorable terms.

5. Strict procedures are established and followed to maintain the confidentiality of the Company's confidential business information relating to DEF's budgeted information and contractual obligations with counterparties, which includes 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 and counterparties have treated and continues to treat the information at issue as confidential.

6. This concludes my affidavit.

Further affiant sayeth not.

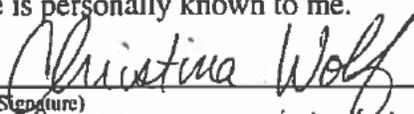
Dated this 13th day of November, 2020.



(Signature)

Benjamin Borsch
Director of IRP & Analytics
Florida Customer Delivery Organization
Duke Energy
299 1st Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 13th day of November, 2020, by Benjamin Borsch. He is personally known to me.



(Signature)

Christina Wolf

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF FLORIDA

9/27/21

(Commission Expiration Date)



CHRISTINA WOLF
Commission # GG 146409
Expires September 27, 2021
Bonded Thru Budget Notary Services

(Serial Number, If Any)