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Matthew R. Bernier
Sr. Counsel
Duke Energy Florida, Inc.

May 7, 2014

VIA OVERNIGHT MAIL

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

REDACTED

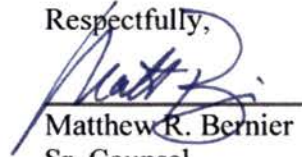
Re: Commission Review of Numeric Conservation Goals (Duke Energy Florida, Inc.);
Docket No. 130200-EI

Dear Ms. Stauffer:

Please find enclosed for filing on behalf of Duke Energy Florida, Inc. ("DEF"), an original and (7) copies of DEF's Request for Confidential Classification in connection with DEF's Response to Southern Alliance for Clean Energy 's (SACE) First Request for the Production of Documents (Nos. 1-11), specifically Request 1-6. The original includes Attachments A, B, C and D.

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,


Matthew R. Bernier
Sr. Counsel

Matthew.Bernier@duke-energy.com

MRB/mw
Enclosures

cc: Certificate of Service

COM _____
AFD 1
APA _____
ECO 1
ENG 3 + B
GCL 1
IDM 1
TEL _____
CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric
Conservation goals (Duke Energy Florida, Inc.)

DOCKET NO. 130200-EI

Filed: May 7, 2014

**DUKE ENERGY FLORIDA'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida ("DEF" or the "Company"), pursuant to Section 366.093, Fla. Stats., and Rule 25-22.006, Florida Administrative Code, submits this Request for Confidential Classification for certain information contained in DEF's Response to Southern Alliance for Clean Energy's ("SACE") First Request for Production of Documents (Nos. 1-11). Specifically, the documents responsive to SACE Request 1-6 include Good Cents' (a third-party consultant) confidential and proprietary Load Impact Analysis prepared for DEF. In support of this Request, DEF states:

1. The following exhibits are included with this request:

(a) Sealed Composite Exhibit A is a package containing an unredacted copy of the Load Impact Analysis responsive to SACE's First Request for Production of Documents (Nos. 1-11) for which DEF seeks confidential treatment. Composite Exhibit A is being submitted separately in a sealed envelope labeled "CONFIDENTIAL." 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.

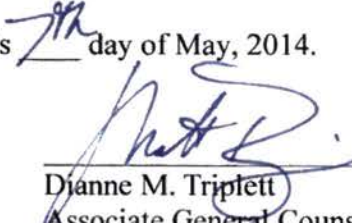
3. As indicated in Exhibit C, the information for which DEF requests confidential classification is “proprietary confidential business information” within the meaning of Section 366.093(3), F.S. Specifically, the Load Impact Analysis contains proprietary and confidential third party information provided to DEF. Disclosure of this information would adversely impact DEF’s competitive business interests by negatively impacting DEF’s ability to contract with third-party consultants. *See* § 366.093(3)(d), F.S.; Affidavit of Helena T. Guthrie at ¶ 5. If DEF cannot guarantee third-party consultants, such as Good Sense, that its proprietary and confidential information will not be made subject to public disclosure, DEF will not be able to contract with, and utilize the expertise of, such third-party consultants, to the detriment of DEF and its customers. *See* § 366.093(3)(e), F.S.; Affidavit of Helena T. Guthrie 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.

4. The information identified as Exhibit “A” is intended to be and is treated as confidential by the Company. *See* Affidavit of Helena T. Guthrie at ¶ 6. This information has not been publicly shared since being received, and DEF follows strict procedures to ensure that access to the information is restricted to those employees who need the information to assist the Company. *See 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 7th day of May, 2014.



Dianne M. Triplett
Associate General Counsel
Matthew Bernier
Sr. Counsel
Duke Energy Florida, Inc.
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St. Petersburg, FL 33701
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Matthew.bernier@duke-energy.com
Attorneys for Duke Energy Florida, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on the following via electronic mail this 7th day of May, 2014.



Attorney

<p>Lee Eng Tan Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 ltan@psc.state.fl.us cmurphy@psc.state.fl.us shopkins@psc.state.fl.us</p> <p>Steven L. Hall, Senior Attorney Office of General Counsel 407 South Calhoun Street, Suite 520 Tallahassee, FL 32399 steven.hall@FreshFromFlorida.com</p> <p>John Butler/Jessica Cano 700 Universe Blvd Juno Beach, FL 33408 john.butler@FPL.com jessica.cano@FPL.com</p> <p>Kevin Donaldson 4200 West Flagler Street Miami, FL 33134 kevin.donaldson@fpl.com</p> <p>Paula K. Brown P.O. Box 111 Tampa, FL 33602 pkbrown@tecoenergy.com</p> <p>Jeffrey A. Stone/ Russell A. Badders Steven R. Griffin Beggs & Lane Gulf Power P.O. Box 12950 Pensacola, FL 32591 srg@beggslane.com</p> <p>Robert Scheffel Wright/John T. LaVia Gardner, Bist, Wiener, Wadsworth, Bodwden, Bush, Dee, LaVia & Wright, P.A. 1300 Thomaswood Drive Tallahassee, FL 32308 schef@gbwlegal.com jlavia@gbwlegal.com</p>	<p>J. Beasley/J. Wahlen/A. Daniels Ausley McMullen Post Office Box 391 Tallahassee, FL 32302 jbeasley@ausley.com jwahlen@ausley.com adaniels@ausley.com</p> <p>Diana Csank Sierra Club 50 F St. NW, 8th Floor Washington, DC 20001 diana.csank@sierraclub.org</p> <p>Jon C. Moyle, Jr. / Karen Putnal Moyle Law Firm, P.A. 118 N. Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com</p> <p>Robert L. McGee, Jr. Gulf Power Company One Energy Place Pensacola, FL 32520 rlmcgee@southernco.com</p> <p>George Cavros Southern Alliance for Clean Energy 120 E. Oakland Park Blvd., Suite 105 Ft. Lauderdale, FL 33334 george@cavros-law.com</p> <p>Alisa Coe/David G. Guest Earthjustice 111 S. Martin Luther King Jr. Blvd. Tallahassee, FL 32301 acoe@earthjustice.org dguest@earthjustice.org bbeard@earthjustice.org</p> <p>James W. Brew / F. Alvin Taylor Brickfield burchette Ritts & Stone 1025 Thomas Jefferson St., NW, Eighth Washington, DC 20007 jbrew@bbrslaw.com ataylor@bbrslaw.com</p>
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Exhibit B

REDACTED

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Bates Nos. DEF-DSM-02592 through DEF-DSM-02764

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
DEF's Response to SACE's First Request for Production of Documents (Nos. 1-11): SACE 1-6	DEF-DSM-02592 through DEF-DSM-02764 in their entirety: Load analyses, evaluations, and measurements prepared for DEF by a third-party consultant(proprietary and confidential).	§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. §366.093(3)(e), 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.

Exhibit D

**AFFIDAVIT OF
HELENA T. GUTHRIE**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric

DOCKET NO. 130200-EI

Conservation goals (Duke Energy Florida, Inc.)

Filed: May 7, 2014

**AFFIDAVIT OF HELENA T. GUTHRIE 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 Helena T. Guthrie, who being first duly sworn, on oath deposes and says that:

1. My name is Helena T. Guthrie. I am over the age of 18 years old and I have been authorized by Duke Energy Florida, Inc. (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 Senior Strategy and Collaboration Manager of Customer Planning & Analytics within the Customer Planning & Analytics Department. This department is responsible for regulatory planning, support and compliance of the Company's Demand-Side Management (DSM) programs.

3. As the Senior Strategy and Collaboration Manager of Customer Planning & Analytics, I am responsible, along with the other members of the section, for the support for development, implementation, training, and budgeting related to the Demand-Side Management Programs.

4. DEF is seeking confidential classification for portions of its Response to Southern Alliance for Clean Energy (SACE)'s Request for the Production of Documents (Nos. 1-11). A detailed description of the confidential information at issue is contained and outlined in DEF's Justification Matrix that is attached to DEF's Request for Confidential Classification as Exhibit C.

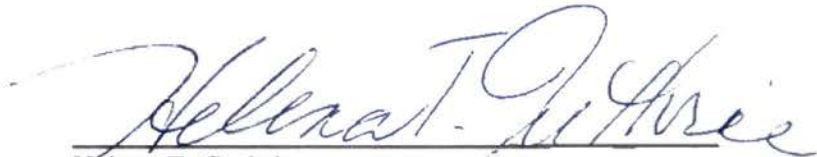
5. DEF is requesting confidential classification of the Load Impact Analysis prepared for DEF by its third-party consultant, Good Cents, because it contains Good Cents' proprietary and confidential information. The disclosure of which would impair the Company's efforts to contract for goods or services on favorable terms and the disclosure would adversely impact DEF's competitive business interests. For example, if third-parties and DEF's suppliers or providers were not comfortable that their proprietary and confidential information would not become part of the public domain, those third-parties would not contract with DEF and DEF would lose its ability to utilize their expertise. Such a scenario would harm the Company's competitive interests as well as DEF's customers' interests.

6. Strict procedures are established and followed to maintain the confidentiality of the terms of the confidential documents and information at issue, including restricting access to those persons who need the information and documents to assist the Company. At no time has the Company publicly disclosed the confidential

information or documents at issue. The Company has treated and continues to treat the information and documents at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.



Helena T. Guthrie
Senior Strategy and Collaboration Manager of
Customer Planning & Analytics
Duke Energy Florida
Post Office Box 14042
St. Petersburg, FL 33733

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 5th day of May, 2014 by Helena T. Guthrie. She is personally known to me, or has produced her _____ driver's license, or her _____ as identification.



(Signature)

(AFFIX NOTARIAL SEAL)

(Printed Name)

NOTARY PUBLIC, STATE OF FLORIDA

(Commission Expiration Date)

(Serial Number, If Any)

