



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

May 23, 2014

VIA ELECTRONIC FILING

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

Re: FPSC Review of the Payment Arrangement Programs offered by the Florida Electric Industry; Docket No. 120243-EI

Dear Ms. Stauffer:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, Inc. ("DEF"), DEF's First Request for Extension of Confidential Classification concerning information provided on page 27 of FPSC's review of Payment Arrangement Programs in Docket No. 120243-EI. The First Request includes Revised Exhibit D.

There are no changes to the confidentiality of page 27 as identified in Exhibits A and C to the original request for confidential classification (DN 07516-12). Therefore, the original Request's Exhibit A (the confidential unredacted documents), Exhibit B (two (2) redacted copies of the confidential documents), and Exhibit C (a justification table in support of DEF's original Request) remain on file with the Clerk. Revised Exhibit D is a supporting affidavit justifying the continued confidential nature of the documents.

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

Matthew R. Bernier

Senior Counsel

Matthew.Bernier@duke-energy.com

MRB/mw
Enclosures

cc: Pamela Page, Office of General Counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: FPSC Review of the Payment
Arrangement Programs offered by the Florida
Electric Industry.

Docket No. 120243-EI

Dated: May 23, 2014

**DUKE ENERGY FLORIDA INC.'S
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

Duke Energy Florida, Inc., (“DEF” or “Company”), pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), submits its First Request for Extension of Confidential Classification for information contained in the Florida Public Service Commission (“FPSC” or “Commission”)’s Review of the Payment Arrangement Programs offered by the Florida Electric Industry (“the Report”), specifically Page 27 of the Report in docket number 120243-EI. In support of this Request, DEF¹ states as follows:

1. On September 26, 2012, DEF filed a request for confidential classification of page 27 of FPSC’s Review of the Payment Arrangement Programs offered by the Report as that page contains sensitive business information such as DEF’s internal payment arrangement guidelines and procedures (Document No. 07516-12).

2. DEF’s September 26, 2012 Request was granted by Order No. PSC-12-0630-CFO-EI on November 26, 2012. The period for confidential treatment granted by that order will expire on May 26, 2014. The information, as referenced above, pertain to the subject of the September 26,

¹ The confidential information at issue was provided to the Commission by DEF’s predecessor, Progress Energy Florida, Inc. (“PEF”).

2012 Request and warrant continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3) F.S. Accordingly, DEF is hereby filing its First Request for Extension of Confidential Classification.

3. DEF submits that page 27 of the Report identified in Exhibit “C” and Exhibit “A” to the September 26, 2012 Request² continues to be proprietary confidential business information within the meaning of Section 366.093(3), F.S. This information is intended to be and is treated as confidential by the Company. *See* Affidavit of Kenneth Talbot ¶¶5-7, attached as Revised Exhibit “D”. The information has not been disclosed to the public. Pursuant to Section 366.093, such materials are entitled to confidential treatment and are exempt from the disclosure provisions of Chapter 119, Florida Statutes.

4. Nothing has changed since the issuance of Order No. PSC-12-0630-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.

² DEF hereby incorporates Exhibits A, B, and C to the original Request, Document No. 07516-12, submitted in Docket no. 120243-EI on September 26, 2012, as if attached hereto.

RESPECTFULLY SUBMITTED this 23rd day of May, 2014.

s/Matthew R. Bernier

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Attorneys for
DUKE ENERGY FLORIDA, INC.

Exhibit A

“CONFIDENTIAL”

(On file with the Clerk)

Exhibit B

REDACTED

(On file with the Clerk)

Exhibit C

(On file with the Clerk)

**Revised
Exhibit D**

**AFFIDAVIT OF
KENNETH TALBOT**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: FPSC Review of the Payment
Arrangement Programs offered by
The Florida Electric Industry.

Docket No. 120243

Dated: May 23, 2014

**AFFIDAVIT OF KENNETH TALBOT IN SUPPORT OF
DUKE ENERGY FLORIDA'S
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Kenneth Talbot. 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 facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Manager of Consumer Affairs in the Florida Customer Contact Department. This section is responsible for handling and monitoring to customer service and programs and complaints.

3. As the Manager of Consumer Affairs, I am responsible, along with the other members of the section, for handling and monitoring to customer service and programs and complaints.

4. DEF is seeking an extension to the confidential classification for certain information, specifically Page 27 to the FPSC Review of the Payment Arrangement Programs offered by the Florida Electric Industry. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Request for Confidential Classification and is outlined in DEF's Justification Matrix that is attached to DEF's Request for Confidential Classification Exhibit C, on file with the Clerk. DEF is requesting an extension of confidential classification of this information because it contains sensitive internal policies and procedures of the Company, the disclosure of which could impair the efforts of the Company to protect internal business information.

5. DEF establishes and maintains internal policies and procedures. DEF must ensure that their sensitive account information, such as their internal policies and procedures, 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. 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 internal policies and procedures, the Company would impair the interests for both DEF and its customers.

6. 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 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 20th day of May, 2014.



(Signature)
Kenneth Talbot
Manager, Consumer Affairs
Florida Customer Contact Department
Duke Energy Florida
5225 Tech Data Dr
Clearwater, FL 33760

20th THE FOREGOING INSTRUMENT was sworn to and subscribed before me this day of May, 2014 by Kenneth Talbot. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

(AFFIX NOTARIAL SEAL)

Marilyn Elaine Ralston
(Signature)

MARILYN ELAINE RALSTON
(Printed Name)

NOTARY PUBLIC, STATE OF Florida

6-24-17
(Commission Expiration Date)

(Serial Number, If Any)

