

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination )  
of Cost Effective Generation Alternative )  
to Meet Need Prior to 2018 for Duke )  
Energy Florida, Inc. )

DOCKET NO. 140111-EI  
Submitted for filing: July 28, 2014

**REDACTED**

**DUKE ENERGY FLORIDA, INC.'S SIXTH REQUEST FOR CONFIDENTIAL CLASSIFICATION REGARDING PORTIONS OF RESPONSES TO NRG FLORIDA LP'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION**

Duke Energy Florida, Inc. ("DEF" or the "Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(3), Florida Administrative Code ("F.A.C."), files this Request for Confidential Classification Regarding Portions of Duke Energy Florida, Inc.'s responses to NRG Florida LP's First Set of Interrogatories (Nos. 1-108) and First Request for Production of Documents (Nos. 1-17). Specifically, DEF is seeking confidential classification of its response to Interrogatories Nos. 5, 8, 37, 62 and 99 and a responsive document to Interrogatory No. 28 and First Request for Production Nos. 1 and 3. Unredacted versions of the documents discussed above are being filed under seal with the Commission as Appendix A on a confidential basis to keep the competitive business information in those documents confidential.

With respect to the confidential information contained in the responses to NRG Florida LP's discovery requests, DEF filed its Notice of Intent to Request Confidential Classification on July 7, 2014 (Document No. 03509-14) and Corrected Exhibit A on July 9, 2014 (Document No. 03549-14). Pursuant to Rule 25-22.006(3), Florida Administrative Code, this request is timely.

DEF hereby submits the following in support of its confidentiality request.

- COM \_\_\_\_\_
- AFD 1
- APA \_\_\_\_\_
- ECO 2
- ENG 2 + Redacted Ex B
- GCL 1
- IDM 1
- TEL \_\_\_\_\_
- CLK \_\_\_\_\_

36053413.1

RECEIVED FPSC  
14 JUL 28 AM 10:51  
COMMISSION CLERK

## BASIS FOR CONFIDENTIAL CLASSIFICATION

Section 366.093(1), Florida Statutes, provides that “any records received by the Commission which are shown and found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from [the Public Records Act].” § 366.093(1), Fla. Stat. Proprietary confidential business information means information that is (i) intended to be and is treated as private confidential information by the Company, (ii) because disclosure of the information would cause harm, (iii) either to the Company’s ratepayers or the Company’s business operation, and (iv) the information has not been voluntarily disclosed to the public. § 366.093(3), Fla. Stat. Specifically, “information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms” is defined as proprietary confidential business information. § 366.093(3)(d), Fla. Stat. Additionally, subsection 366.093(3)(e) defines “information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information,” as proprietary confidential business information.

DEF is requesting confidential classification of the responsive information to NRG Florida LP’s First Set of Interrogatories to Duke Energy Florida, Inc. Nos. 1-108 and Request for Production Nos. 1 and 3, specifically as noted above and in the supporting affidavit of Borsch ¶ 4, because the response contains proprietary and confidential competitive business information, internal workpapers, information reports, including information concerning contractual data and competitively sensitive commercial information and potential supplier data, the disclosure of which would adversely impact DEF’s competitive business interests. Affidavit of Borsch, ¶ 5. The Company must be able to assure these vendors that sensitive business information will be kept confidential. Indeed, most of the contracts at issue contain confidentiality provisions that

prohibit the disclosure of the terms of the contract to third parties. Id. If third parties were made aware of confidential contractual terms and conditions that the Company has with other parties, they may offer DEF less competitive contractual terms and conditions in any future contractual negotiations. Without DEF's measures to maintain the confidentiality of sensitive terms in these proposals and contracts between DEF and these vendors, the Company's efforts to obtain competitive contracts would be undermined. Affidavit of Borsch, ¶ 6.

### **Confidentiality Procedures**

Strict procedures are established and followed to maintain the confidentiality of the terms of all of the confidential documents and information at issue, including restricting access to those persons who need the information and documents to assist the Company. See Affidavit of Borsch, ¶ 7.

At no time has the Company publicly disclosed the confidential information or documents at issue; DEF has treated and continues to treat the information and documents at issue as confidential. See Affidavit of Borsch, ¶ 8. DEF requests this information be granted confidential treatment by the Commission.

### **Conclusion**

The competitive, confidential information at issue in this Request fits the statutory definition of proprietary confidential business information under Section 366.093, Florida Statutes, and Rule 25-22.006, F.A.C., and therefore that information should be afforded confidential classification. In support of this motion, DEF has enclosed the following:

(1) A separate, sealed envelope containing one copy of the confidential Appendix A to DEF's Sixth Request for Confidential Classification which DEF intends to request confidential classification with the appropriate section, pages, or lines containing the confidential information

highlighted. **This information should be accorded confidential treatment pending a decision on DEF's Request by the Commission;**

(2) Two copies of the documents with the information for which DEF intends to request confidential classification redacted by section, pages, or lines where appropriate as Appendix B; and,

(3) A justification matrix of the confidential information contained in Appendix A supporting DEF's Request, as Appendix C.

WHEREFORE, DEF respectfully requests that the redacted portions of DEF's response to NRG Florida LP's First Set of Interrogatories (Nos. 1-108) and Request for Production (Nos. 1 and 3) be classified as confidential for the reasons set forth above.

Respectfully submitted this 28<sup>th</sup> day of July, 2014.

John T. Burnett  
Deputy General Counsel  
Dianne M. Triplett  
Associate General Counsel  
DUKE ENERGY FLORIDA, INC.  
Post Office Box 14042  
St. Petersburg, FL 33733-4042  
Telephone: (727) 820-5587  
Facsimile: (727) 820-5519

/s/ Blaise N. Gamba  
James Michael Walls  
Florida Bar No. 0706242  
Blaise N. Gamba  
Florida Bar No. 0027942  
CARLTON FIELDS JORDEN BURT, P.A.  
Post Office Box 3239  
Tampa, FL 33601-3239  
Telephone: (813) 223-7000  
Facsimile: (813) 229-4133

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and overnight mail this 28<sup>th</sup> day of July, 2014.

/s/ Blaise N. Gamba

Attorney

Michael Lawson  
Florida Public Service Commission Staff  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Phone: (850) 413-6199  
Facsimile: (850) 413-6184  
Email: [mlawson@psc.state.fl.us](mailto:mlawson@psc.state.fl.us)

Charles Rehwinkel  
Deputy Public Counsel  
Erik Saylor  
Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
Phone: (850) 488-9330  
Email: [rehwinkel.charles@leg.state.fl.us](mailto:rehwinkel.charles@leg.state.fl.us)  
[Saylor.erik@leg.state.fl.us](mailto:Saylor.erik@leg.state.fl.us)

Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301  
Phone: (850) 681-3828  
Fax: (850) 681-8788  
Email: [jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)

James W. Brew  
F. Alvin Taylor  
Brickfield Burchette Ritts & Stone, PC  
1025 Thomas Jefferson St NW  
8th FL West Tower  
Washington, DC 20007-5201  
Phone: (202) 342-0800  
Fax: (202) 342-0807  
Email: [jbrew@bbrslaw.com](mailto:jbrew@bbrslaw.com)  
[ataylor@bbrslaw.com](mailto:ataylor@bbrslaw.com)

Robert Scheffel Wright  
John T. LaVia, III  
Gardner Law Firm  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
Phone: (850) 385-0070  
Email: [Schef@gbwlegal.com](mailto:Schef@gbwlegal.com)  
[Jlavia@gbwlegal.com](mailto:Jlavia@gbwlegal.com)

Marsha E. Rule  
Rutledge Ecenia  
119 South Monroe Street, Ste. 202  
Tallahassee, FL 32301  
Phone: (850) 681-6788  
Fax: (850) 681-6515  
Email: [marsha@rutledge-ecenia.com](mailto:marsha@rutledge-ecenia.com)

Gordon D. Polozola  
NRG Energy, Inc.  
112 Telly Street  
New Roads, LA 70760  
Phone: (225) 618-4084  
Email: [Gordon.Polozola@nrgenergy.com](mailto:Gordon.Polozola@nrgenergy.com)

Richard A. Zambo  
Richard A. Zambo, P.A.  
2336 S.E. Ocean Boulevard, #309  
Stuart, FL 34966  
Phone: (772) 225-5400  
Email: [richzambo@aol.com](mailto:richzambo@aol.com)

DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation  
Alternative to Meet Need Prior To 2018 For Duke Energy Florida, Inc.

Duke Energy Florida, Inc.'s  
Sixth  
Request for Confidential Classification

**EXHIBIT B**



8. Who currently owns the land to be acquired at Suwannee?

**REDACTED**

**RESPONSE:**

**[REDACTED]**

37. Please provide a cost breakdown, equipment description, construction schedule, and construction costs included in the \$15.7 million in network upgrades that Duke requires for the Suwannee Peakers.

REDACTED

**RESPONSE:**

The cost to interconnect the Suwannee River 115 kV CT at DEF's Suwannee River 115 kV substation, is estimated to be approximately [REDACTED]. This includes the cost of upgrading the 0.9 mile 115 kV transmission, six new 3000A breakers (1 net new, 5 upgrades). In addition, the costs to interconnect the Suwannee 230 kV CT at DEF's Suwannee 230 kV substation, is estimated to be approximately [REDACTED]. This includes upgrading protection and control equipment, upgrading jumpers, CTs, Relay equipment, buswork, wavetrap removal, six new 3000 A 230 kV breakers, and substation switches.

Equipment Description	Total Costs	2014	2015	2016
P & C Equipment Upgrades	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Jumpers	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
115 kV Buswork	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
230 kV Buswork	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Wave Trap Removal 230 kV	[REDACTED]	1	[REDACTED]	[REDACTED]
115 kV Breakers	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
230 kV Breakers	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
230 kV Substation Switches	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
115 kV Line upgrade (1 mile)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

62. Please provide the assumptions regarding fuel purchase arrangements for Acquisition 1.

REDACTED

RESPONSE:

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation  
Alternative to Meet Need Prior To 2018 For Duke Energy Florida, Inc.

Duke Energy Florida, Inc.'s  
Sixth  
Request for Confidential Classification

Documents bearing Bates Numbers  
14LGBRA-NRGROG1-28-000001  
through  
14LGBRA-NRGROG1-28-000008  
in their entirety

REDACTED

## Cost estimate

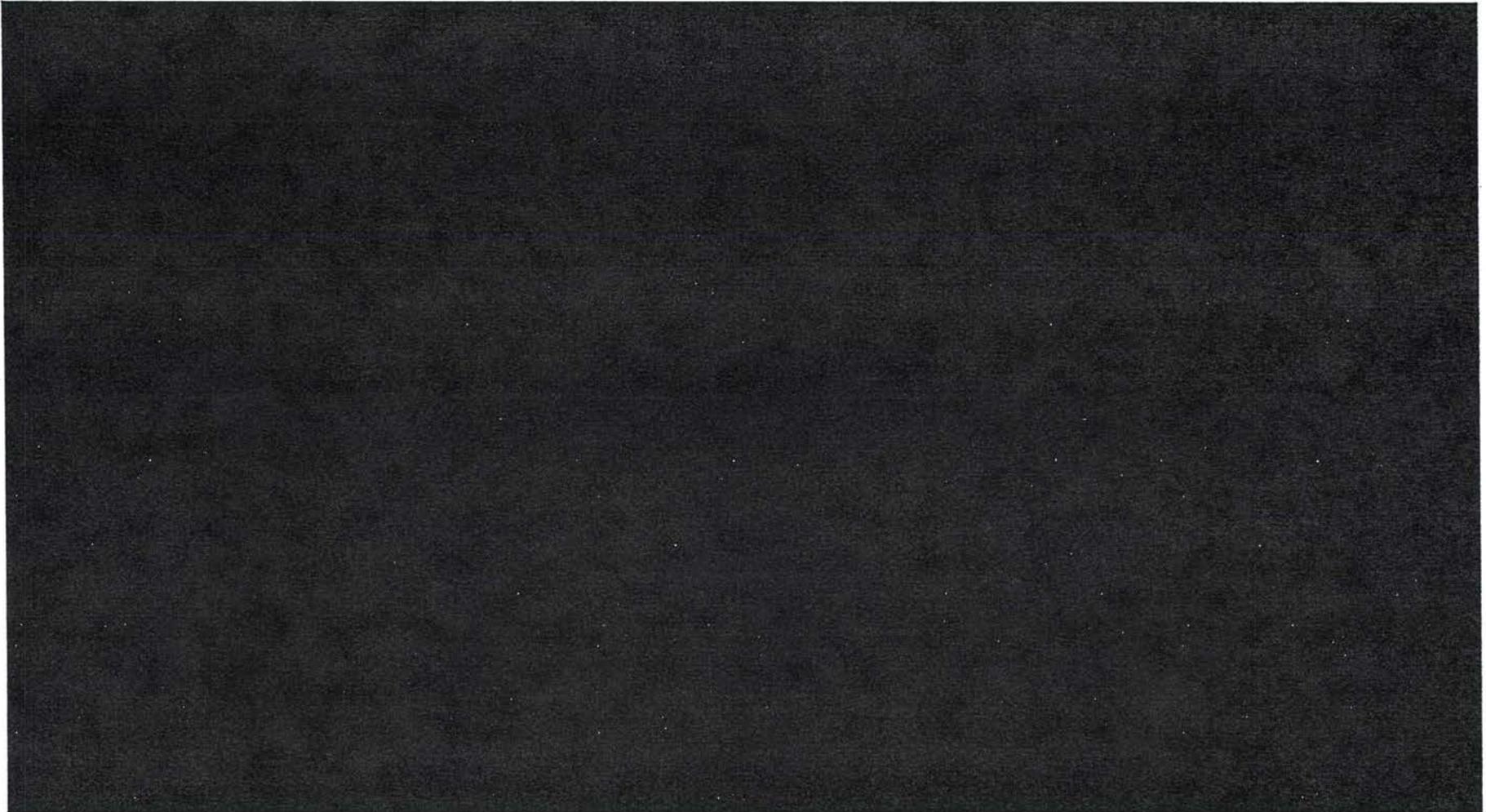
- Total cost is \$160 million as summarized in the following table:

Estimate Category	\$ million
Engineering, procurement and Construction (EPC)	[REDACTED]
Owner Equipment (Chiller Packages and Storage Tank)	
Owners Cost	
Escalation & Contingency	
<b>Subtotal Project Estimate</b>	
AFUDC	
<b>Total Project Cost</b>	<b>\$160</b>

- The cost estimate represents the maximum value from the project's Class 5 estimate
- Significant engineering and acquisition of firm price equipment package and engineering, procurement and construction (EPC) bids are planned to refine the project scope, cost, and schedule that would support a Class 3 estimate by August 2014
- The project will make expenditures or cancellation commitments of approximately [REDACTED] prior to receipt of the final FPSC order expected in October 2014 to maintain the 2017 schedule

REDACTED

## Risks and mitigation



REDACTED

### Regulatory Approvals

Generally, a generating plant uprate project such as the Hines Chillers is not subject to the need determination process in Florida. However, given the 2013 Settlement Agreement, DE Florida intends to file a petition seeking approval of DE Florida's determination that the self-build proposal, rather than other power purchase agreements or acquisitions, is the most cost effective option to meet its 2016-2017 need.

DE Florida's filing will be similar to a traditional need determination proceeding, such that DE Florida will include its IRP and explain that, when considering both quantitative and qualitative factors, the self-build option is more cost effective than the alternatives.

The main difference from a traditional need proceeding is that DE Florida will not be strictly bound to the cost estimate included in this filing. (In a traditional need proceeding, pursuant to rule, a utility cannot recover prudent costs above the estimate included in the need determination proceeding absent extraordinary circumstances.) However, given that the Florida Public Service Commission ("FPSC") will be approving the selected option on the basis of the assumed project cost for the self-build proposal, DE Florida will be expected to complete the project at the estimated cost and, if the ultimate cost is higher, it must be able to point to specific facts and reasons for the cost increase.

According to the current timeline, DE Florida will submit the filing to approve the self-build in May 2014 with an anticipated hearing in August 2014 and final FPSC order estimated in October 2014. Once the project is completed in 2017, DE Florida will initiate another filing to include the costs of the project in base rates under the terms of the 2013 Settlement Agreement.

The Hines Facility Site air permit will need to be modified to permit higher annual emissions. The air permit modification application will be filed with the Florida Department of Environmental Protection ("FDEP") by September 2014, and the air permit is expected to be issued by June 2015.

For reference purposes, below is a cumulative Hines Chillers project cash flow of commitments through December 2014 that are necessary to maintain the 2017 schedule and would be in advance of the receipt of the final FPSC order.

2014 \$ million	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Project Development Cost								

Estimate Category	\$ million
Engineering, procurement and Construction (EPC)	
Owner Equipment (Chiller Packages and Storage Tank)	
Owners Cost	
Escalation & Contingency	
<b>Subtotal Project Estimate</b>	
AFUDC	
<b>Total Project Cost</b>	<b>\$160</b>

Annual Capital (\$ million)	2014	2015	2016	2017	Total
Project	\$5	\$65	\$60	\$20	\$150
AFUDC	\$0	\$3	\$6	\$1	\$10
Total Project	\$5	\$68	\$66	\$21	\$160

Approximately \$2.0 million has previously been approved for the project development activities, and \$0.3 million has been expended through February 2014.

Once the project is completed in 2017. DE Florida will initiate a filing to include the costs of the project in base rates under the terms of the 2013 Settlement Agreement.

**Schedule**

Key project milestones for proposed project are provided in the following table. A complete Level 1 schedule for the Hines Chillers uprate project is included in Appendix D supporting a June 2017 COD as requested by Company management.

Key Project Milestone	Date
BOD Project Funding Approval ("Commit")	April 30, 2014
Bid Chiller Packages	May 2014
FPSC Need Filing	May 2014
Bid EPC	June 2014
Complete Class 3 Scope, Estimate and Schedule	August 2014
Expected Final FPSC Order	October 2014
Award Equipment and EPC	January 2015
Receive Air Permit	June 2015
EPC Begin Construction	July 2015
Commercial Operation (all 4 blocks)	By June 2017

### **Project Execution Plan**

The project team will develop a project execution plan by August 2014 in accordance with Project Management Center of Excellence and PMC standards.

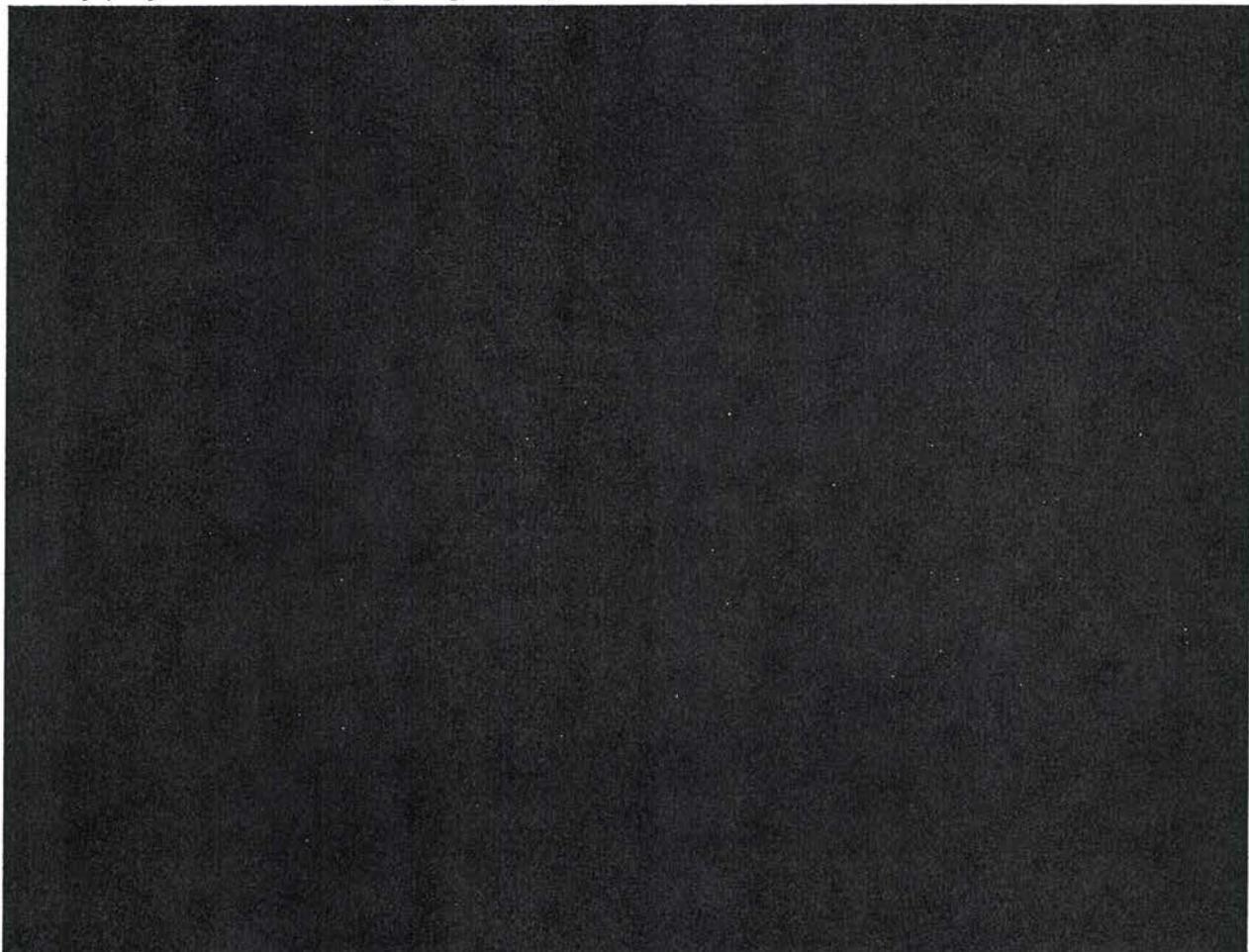
As a retrofit project a significant amount of engineering is planned in order to develop a class 3 level scope, cost estimate and schedule and prior to contract awards.

EPC for the project will be competitively bid. The likely bidders for the chiller water packages and storage tank are TAS and Stellar. The EPC contracting approach and bid list will be determined by July 2014.

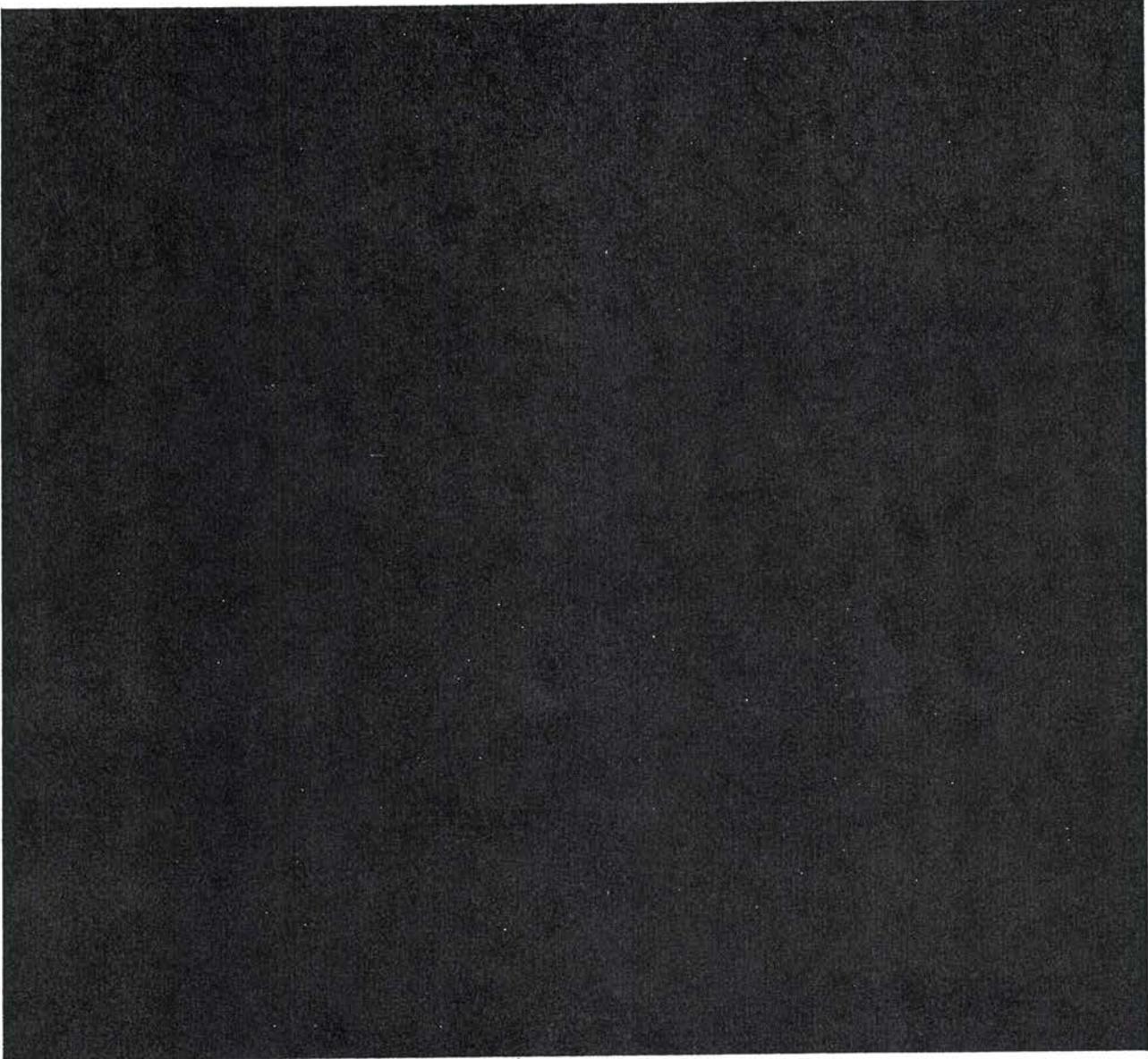
Air inlet chilling is common in the industry and many installations have been made on F class gas turbines of this type. Duke Energy has inlet chilling on a number of its facilities including Buck, Dan River, Fayette, Hanging Rock and Washington combined cycle facilities. In addition, Duke Energy has provisions for air inlet chilling on the HF Lee and Sutton CC plants as well as the proposed Lee (South Carolina) CC project.

### **Risk & Mitigation**

Key project risks and mitigating strategies are discussed below:



REDACTED

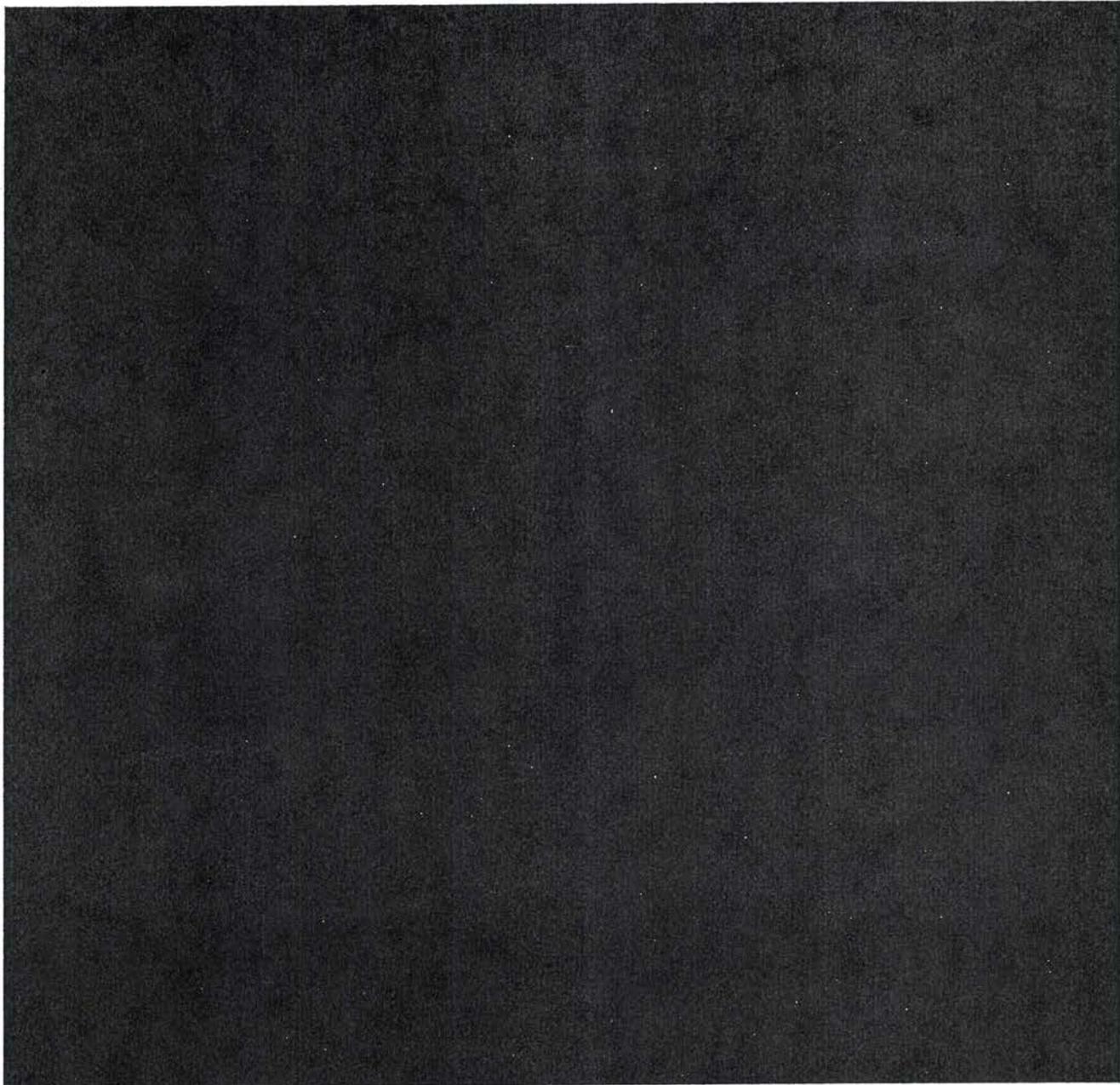


**Recommendation**

Management recommends that the Finance and Risk Management Committee of the Duke Energy Corporation (the "Corporation") Board of Directors (the "Board") recommend that the Board grant approval for the Corporation to advance funds to DE Florida up to the amount of \$160 million (including AFUDC) to engineer, procure all equipment, construct and commission the Hines Chillers uprate project CT for a June 2017 COD.

REDACTED

Appendix C – Cost Estimate Summary



DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation  
Alternative to Meet Need Prior To 2018 For Duke Energy Florida, Inc.

Duke Energy Florida, Inc.'s  
Sixth  
Request for Confidential Classification

Document bearing Bates Numbers  
14LGBRA-NRGPOD1-1-000020  
through  
14LGBRA-NRGPOD-1-000033  
in its entirety

REDACTED

## Cost estimate

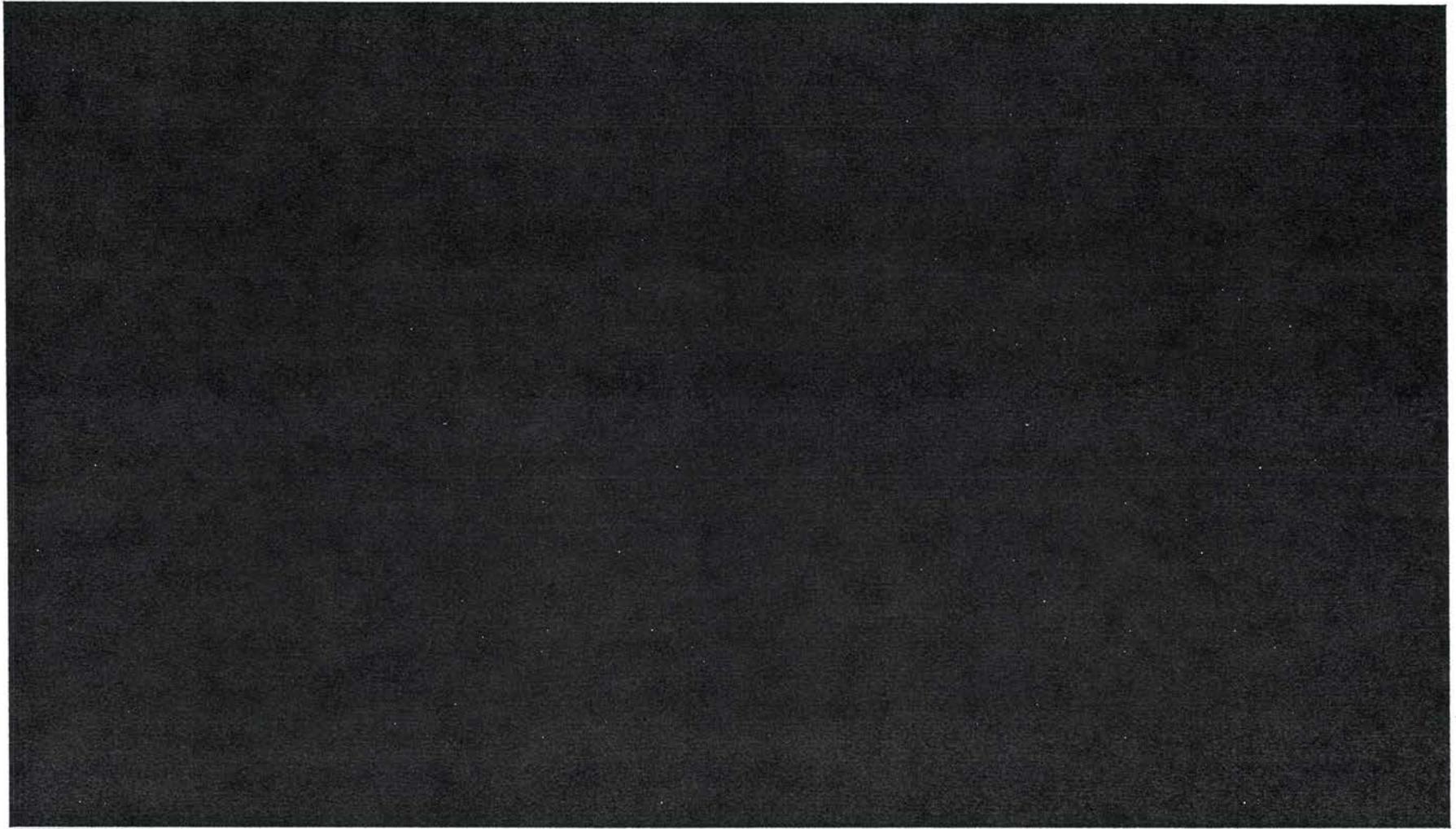
- Total cost is \$196.9 million as summarized in the following table:

Estimate Category	(\$ million)
Engineering, procurement and Construction (EpC)	
Owner Equipment (CTGs and GSUs)	
Owners Cost	
Transmission (Switchyard & Bus Line)	
Escalation & Contingency	
<b>Subtotal Project Estimate</b>	
AFUDC	
<b>Total Project Cost</b>	<b>\$196.9</b>

- The project will make expenditures or cancellation commitments of approximately [REDACTED] prior to receipt of the final FPSC order expected in October 2014 to maintain the 2016 schedule

REDACTED

## Risks and mitigation



2014 (\$ million)	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Gas Turbines and GSUs								
EPC								
Other including owner's cost								
<b>TOTAL</b>	<b>\$10.0</b>	<b>\$16.8</b>	<b>\$22.9</b>	<b>\$27.6</b>	<b>\$34.9</b>	<b>\$39.2</b>	<b>\$41.9</b>	<b>\$43.7</b>

**Project Scope**

The Suwannee brownfield site was chosen largely based upon existing land, gas and transmission infrastructure to support a 2016 COD. The Suwannee plant has existing gas and oil fired combustion turbines and steam units and is located near Live Oak in Suwannee County, FL (refer to Appendix A). Approximately 24 acres of property located adjacent to the Suwannee SC site will be purchased as a buffer area.

F class combustion turbine technology was chosen for the proposed 320 MW Suwannee SC project based upon peaking need, cost, reliability, operational flexibility, and existing DE Florida fleet operations and maintenance (“O&M”) synergies.

As a result of the siting and project development efforts, the scope proposed for this project represented by the cost estimate below will consist of two F class combustion turbine generators (“CTGs”), two generator step-up transformers (“GSUs”), fuel oil and demineralized water storage tanks, and related balance of plant facilities.

One CTG unit will be connected to the existing 115kV transmission switchyard and the other to the 230kV transmission switchyard. Natural gas will be supplied via Florida Gas Transmission and local gas distribution lateral to the existing site metering and regulating station on the site and connected to the new CTGs. Fuel oil will be supplied via truck to the 2.5 million gallon storage (approximately 3 day supply). Appendix B shows the Suwannee plant layout.

The project scope has been documented in a Project Requirements Outline (“PRO”) that has been reviewed by the IRP team, Power Generation Operations, Transmission, Fuels and other internal key stakeholders.

**Cost Estimate**

Financial details associated with the proposed Suwannee SC project funding authorization are provided in the following category summary and annual tables.

The \$196.9 million total project capital estimate noted above represents the most likely value from the project’s class 4 estimate (expected to be updated as class 3 upon receipt of firm EPC bids on March 24, 2014). An independent estimate review board (“IERB”) conducted a review of this project cost estimate on March 5, 2014; the IERB estimate summary document from this review is provided in Appendix C to this report.

REDACTED

Estimate Category	(\$ million)
Engineering, procurement and Construction (EPC)	
Owner Equipment (CTGs and GSUs)	
Owners Cost	
Transmission (Switchyard & Bus Line)	
Escalation & Contingency	
<b>Subtotal Project Estimate</b>	
AFUDC	
<b>Total Project Cost</b>	<b>\$196.9</b>

Annual capital (\$ million)	2014	2015	2016	Total
Project Cash Flow	\$67.3	\$98.9	\$13.9	\$180.1
AFUDC	\$1.7	\$9.0	\$6.1	\$16.8
<b>Total Project</b>	<b>\$69.0</b>	<b>\$107.9</b>	<b>\$20.0</b>	<b>\$196.9</b>

Approximately \$1.4 million has previously been approved for the project development activities, and \$1.0 million has been expended through February 2014.

Once the project is completed in 2016, DE Florida will initiate a filing to include the costs of the project in base rates under the terms of the 2013 Settlement Agreement.

Preliminary annual O&M projections are provided in the following table:

O&M cost (\$000)	2016	2017	2018	2019	2020
Station Labor (including labor loads)	600	1,200	1,200	1,400	1,400
Operating costs	150	350	350	350	400
Maintenance costs	100	350	400	400	450
Other costs (support & indirect costs)	100	200	250	250	300
<b>Total O&amp;M Expense</b>	<b>950</b>	<b>2,100</b>	<b>2,200</b>	<b>2,400</b>	<b>2,550</b>

### Schedule

Key project milestones for proposed project are provided in the following table. A complete Level 1 schedule for the Suwannee SC project is included in Appendix D supporting a June 2016 COD as requested by Duke Energy management.

REDACTED

Key Project Milestone	Date
Submit Air Permit Application	April 2014
BOD Project Funding Approval ("Commit")	April 30, 2014
Award/Release CTG and GSU Contracts	May 2014
Award/Release EPC Contract	May 2014
FPSC Need Filing	May 2014
Receive Air Permit	October 2014
Expected Final FPSC Order	October 2014
EPC Begin Construction	November 2014
CTG Site Delivery	June 2015
Mechanical Completion	January 2016
First Fire	February 2016
Commercial Operation	June 2016

### Project Execution Plan

The project team has developed a project execution plan in accordance with Project Management Center of Excellence and PMC standards.

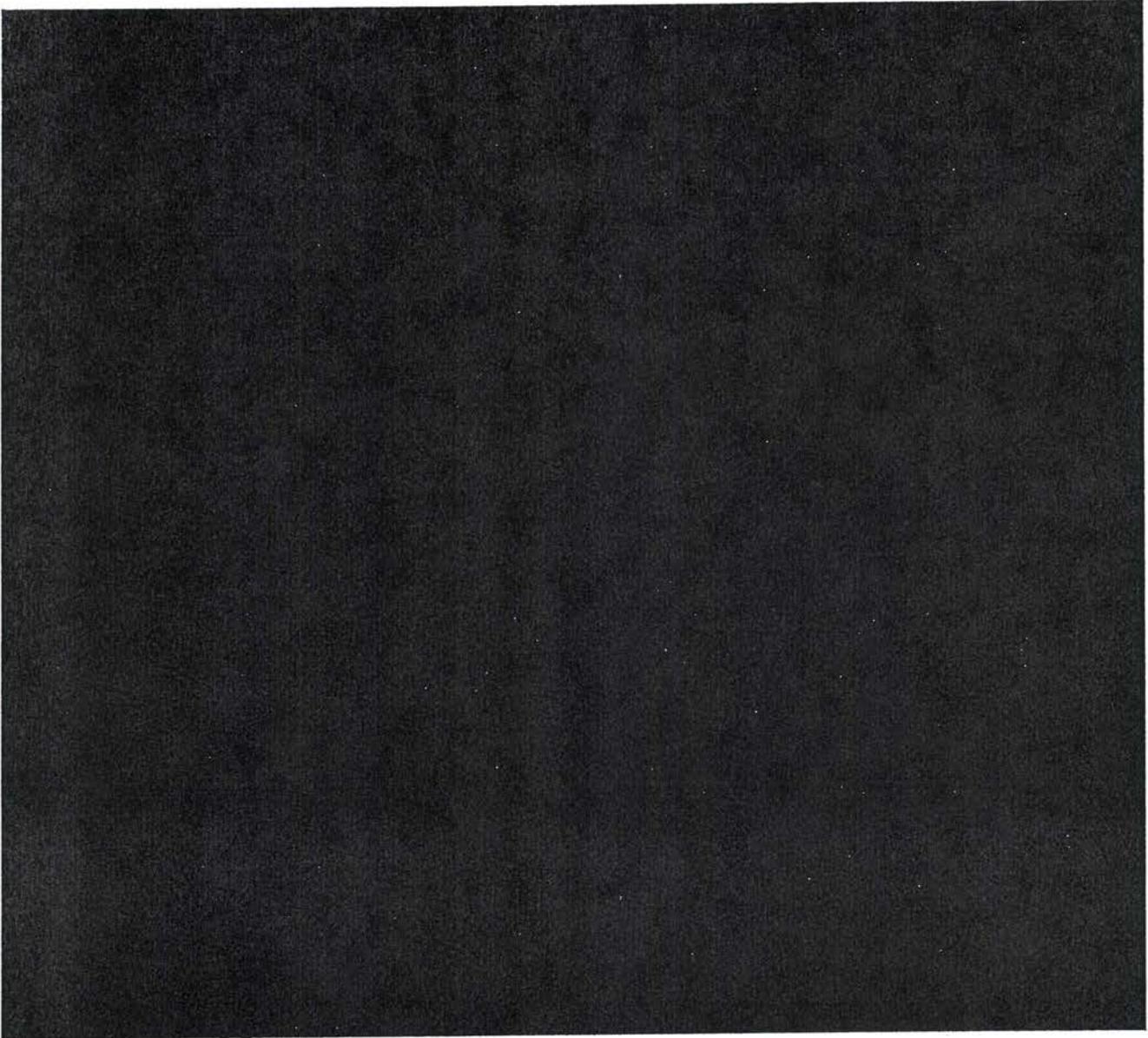
The contracting approach for the project is for Duke Energy to directly purchase the major equipment (CTGs and GSUs) and award the majority of the EPC scope to a single EPC contractor. Both the major equipment and EPC supply have been competitively bid with firm fixed pricing. It is anticipated that the major equipment suppliers and EPC contractor will be released after full funding for the project is authorized.

Duke Energy has successfully executed a number of gas turbine projects using similar proven F class technology with this contracting approach and will leverage that knowledge and experience for the Suwannee SC project.

### Risk & Mitigation

Key project risks and mitigating strategies are discussed below:

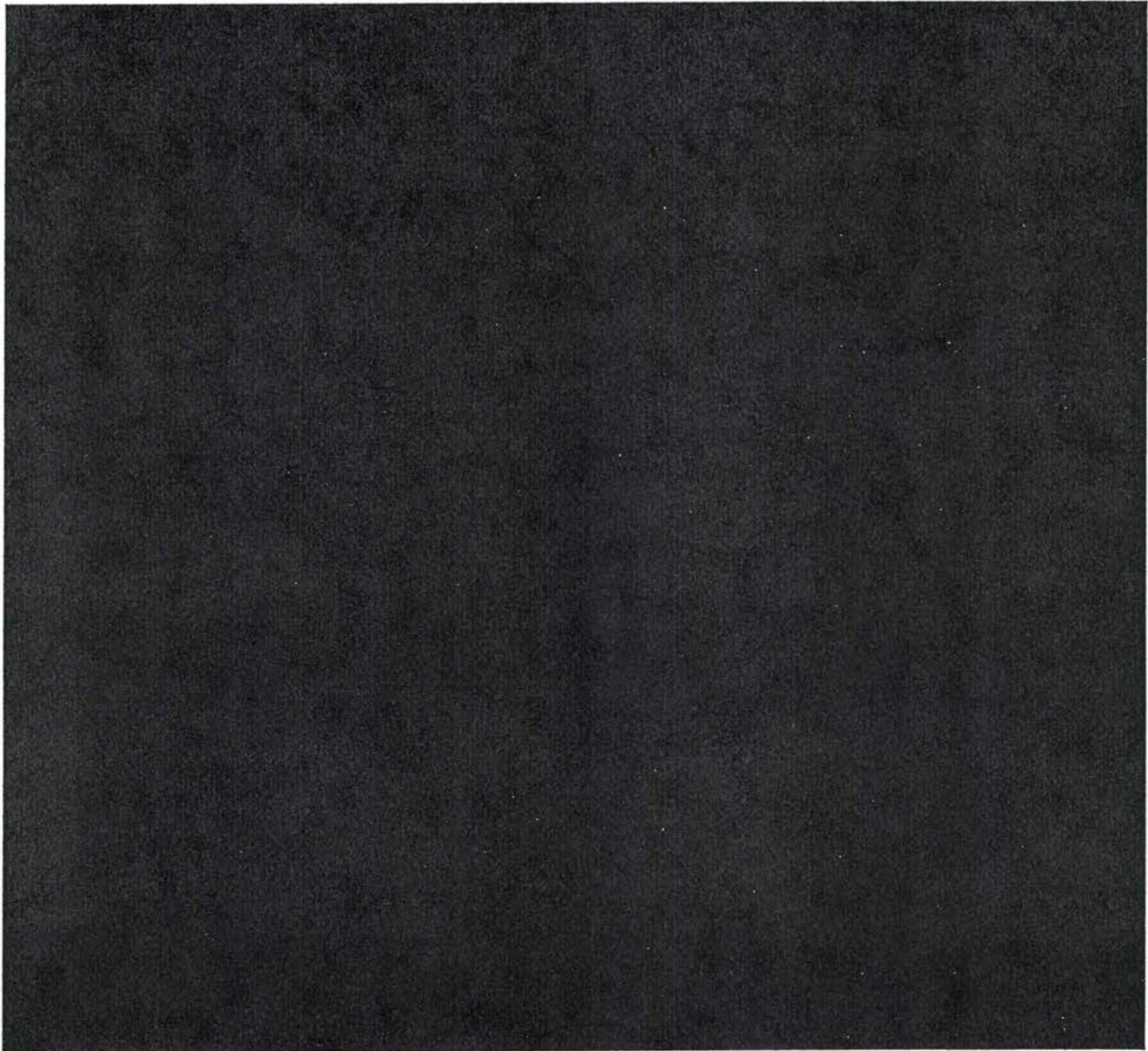
REDACTED



A project risk register summary is included in Appendix E.

REDACTED

Appendix C – Detailed Cost Estimate



REDACTED

Appendix E – Risk Matrix

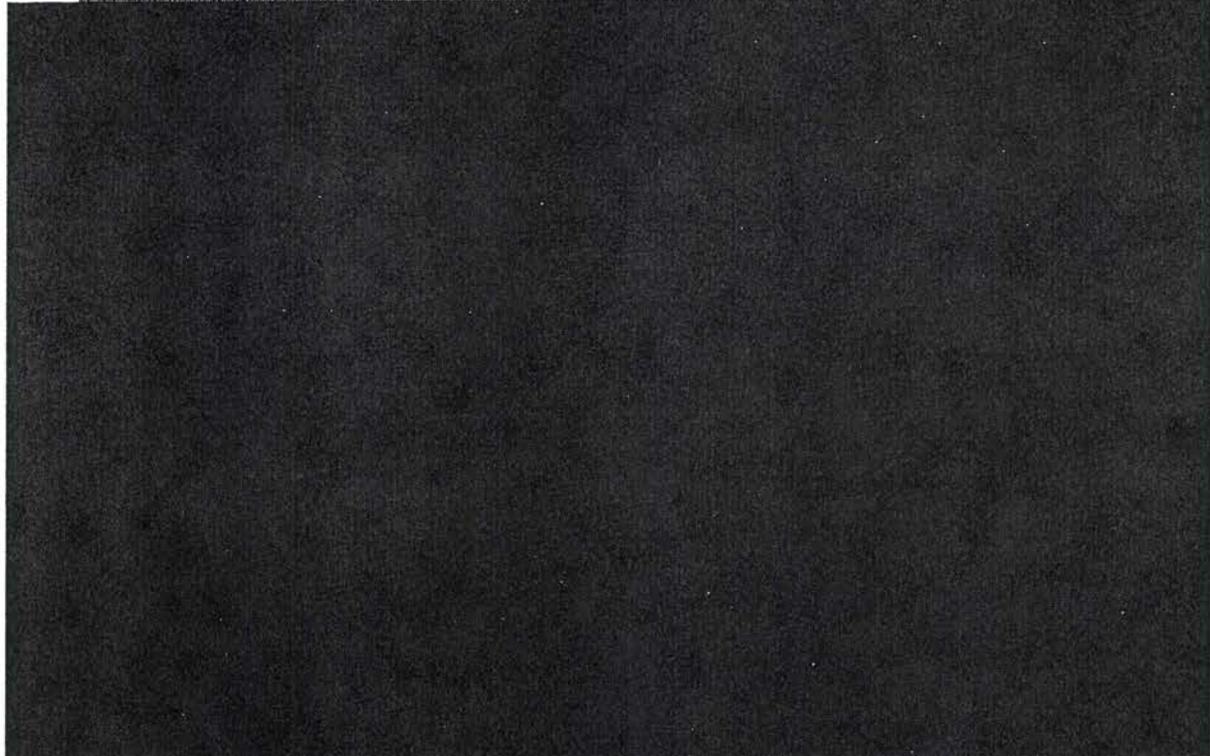
**Project Risk and Contingency Monthly Summary**

**Top 10 Risks For:** Suwanne SC Project **Date:** 3/12/2014

Probability	Minimal	Moderate	Significant	Severe	Critical	Impact
	< 2%	< 5%	< 10%	< 15%	> 15%	
Very High [90-100%]						
High [66-89%]		5				
Moderate [34-65%]	23, 6, 2		9			
Low [11-33%]	17, 24, 14, 15, 24					
Very Low [0-10%]						

This space reserved for Project team comments.

Order	Risk ID	Risk Short Name	Project Risk EMV (\$)	Total Risk EMV (\$)	Total Impact (\$)
-------	---------	-----------------	-----------------------	---------------------	-------------------



Total Risk EMV = Project Risk EMV + Enterprise Risk EMV  
 Contingency is added to the project cost to cover risk and estimate uncertainty. Contingency is monitored and adjusted throughout the life of the project.  
 Total Impact is the project and enterprise cost that would be incurred should the risk trigger

References: PJM-000012-ENTSTD, Project Cost & Contingency Management, PJM-000013-ENTSTD, Project Risk Management

DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation  
Alternative to Meet Need Prior To 2018 For Duke Energy Florida, Inc.

Duke Energy Florida, Inc.'s  
Sixth  
Request for Confidential Classification

Document bearing Bates Numbers  
14LGBRA-NRGPOD1-3-000001  
through  
14LGBRA-NRGPOD-3-000023  
in its entirety

DOCKET 140111-EI

In re: Petition for Determination of Cost Effective Generation  
Alternative to Meet Need Prior To 2018 For Duke Energy Florida, Inc.

Duke Energy Florida, Inc.'s  
Sixth  
Request for Confidential Classification

Document bearing Bates Numbers  
14LGBRA-NRGPOD1-3-000024  
through  
14LGBRA-NRGPOD1-3-000048  
in its entirety

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 140111-EI**  
**Sixth Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Interrogatories No. 5	Response, 1 <sup>st</sup> Line, eighth and ninth words; All information in table excluding headers	<p>§366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Interrogatories No. 8	All information in response	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 140111-EI**  
**Sixth Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Interrogatories No. 37	Response, 1 <sup>st</sup> paragraph, 2 <sup>nd</sup> line, fourth and fifth words from end, 5 <sup>th</sup> line, second word from end, Table, all information in 2 <sup>nd</sup> through 5 <sup>th</sup> columns exclusive of headings	<p>§366.093(3)(d), Fla. Stat.  The document in question contains confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Interrogatories No. 62	Response in its entirety	<p>§366.093(3)(a), Fla. Stat.  The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s	Response: all information	§366.093(3)(a), Fla. Stat.

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 140111-EI**  
**Sixth Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
Response to NRG Florida LP's First Interrogatories No. 99	in table exclusive of headings	<p>The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Interrogatories No. 28, Bates No. 14LGBRA-NRGROG1-28-000001 through 14LGBRA-NRGROG1-28-000008	Entire Document	<p>§366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business</p>

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 140111-EI**  
**Sixth Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Request for Production No. 1, Bates No. 14LGBRA-NRGPOD1-1-000001 through 14LGBRA-NRGPOD1-1-000009	Page 6, all information in last column of table except last line, last bullet point, 1 <sup>st</sup> line, third from last word; Page 8, all information on page exclusive of header and footer	<p>§366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Request for Production No. 1, Bates No. 14LGBRA-NRGPOD1-1-000010 through 14LGBRA-NRGPOD1-1-000019	Page 2, last line, all information in 2 <sup>nd</sup> through 9 <sup>th</sup> columns; Page 4, 1 <sup>st</sup> Table, all information in last column except header and last line; Page 5, all information beginning at paragraph 8 through end of page; Page 6, all information on page except last two paragraphs; Page 9, all information on page exclusive of header	<p>§366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on</p>

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 140111-EI**  
**Sixth Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>favorable terms.</p> <p>§366.093(3)(e), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Request for Production No. 1, Bates No. 14LGBRA-NRGPOD1-1-000020 through 14LGBRA-NRGPOD1-1-000033</p>	<p>Entire Document</p>	<p>§366.093(3)(a), Fla. Stat.  The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Request for Production No. 1, Bates No. 14LGBRA-NRGPOD1-1-000034 through 14LGBRA-NRGPOD1-1-000042</p>	<p>Page 6, 1<sup>st</sup> bullet point table, all information in last column exclusive of header and last line, 2<sup>nd</sup> bullet point, first line, last word; Page 8, all information on page exclusive of header and footer</p>	<p>§366.093(3)(a), Fla. Stat.  The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p>

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 140111-EI**  
**Sixth Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Request for Production No. 1, Bates No. 14LGBRA-NRGPOD1-1-000043 through 14LGBRA-NRGPOD1-1-000055	Page 3, Table at top of page, all information in 2 <sup>nd</sup> through 8 <sup>th</sup> columns exclusive of header and last line; Page 4, First Table, last column, all information in last column exclusive of header and last line; Page 5, 4 <sup>th</sup> , 8 <sup>th</sup> and last paragraphs in their entirety; Page 6 in its entirety exclusive of last line; Page 10, entire page exclusive of header; Page 13, Second Table on page in its entirety	<p>§366.093(3)(a), Fla. Stat.  The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat.  The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat.  The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Response to NRG Florida	Entire Document	<p>§366.093(3)(a), Fla. Stat.  The document in question contains</p>

**DUKE ENERGY FLORIDA**  
**DOCKET NO. 140111-EI**  
**Sixth Request for Confidential Classification**  
**Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
LP's First Request for Production No. 1, Bates No. 14LGBRA-NRGPOD1-3-000001 through 14LGBRA-NRGPOD1-3-000023		<p>proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
Duke Energy Florida, Inc.'s Response to NRG Florida LP's First Request for Production No. 1, Bates No. 14LGBRA-NRGPOD1-3-000024 through 14LGBRA-NRGPOD1-3-000048	Entire Document	<p>§366.093(3)(a), Fla. Stat. The document in question contains proprietary confidential information relating to trade secrets, the disclosure of which would impair DEF's business operations.</p> <p>§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which</p>

DUKE ENERGY FLORIDA  
 DOCKET NO. 140111-EI  
 Sixth Request for Confidential Classification  
 Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		would impair the competitive business of the provider/owner of the information.