

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Need for Citrus County Combined) DOCKET NO. 140110-EI
Cycle Power Plant) Submitted for filing: August 11, 2014
_____)

DUKE ENERGY FLORIDA, INC.'S NOTICE OF FILING VERIFIED AFFIDAVITS

Duke Energy Florida, Inc. ("DEF") hereby gives notice of service of verified affidavits as follows:

1. Affidavit of Mark E. Landseidel in support of responses to Citizens' First Set of Interrogatories to Duke Energy Florida, Inc. Nos. 2a, 9a through 9e, 10a and 10b;
2. Affidavit of Jeffrey Patton in support of responses to Citizens' First Set of Interrogatories to Duke Energy Florida, Inc. Nos. 11a, 11b and 12;
3. Affidavit of Benjamin M.H. Borsch in support of responses to Citizens' First Set of Interrogatories to Duke Energy Florida, Inc. Nos. 1, 2b, 3a through 3c, 4a, 4b, 5, 6, 7a through 7f, and 8a through 8d;
4. Affidavit of Amy Dierolf in support of responses to Staff's First Set of Interrogatories to Duke Energy Florida, Inc. Nos. 30 and 31;
5. Affidavit of Ed Scott in support of responses to Staff's First Set of Interrogatories to Duke Energy Florida, Inc. No. 39;
6. Affidavit of Alan S. Taylor in support of responses to Staff's First Set of Interrogatories to Duke Energy Florida, Inc. Nos. 40 and 41;
7. Affidavit of Benjamin M.H. Borsch in support of the supplemental response to Calpine Construction Finance Company, L.P.'s First Set of Interrogatories to Duke Energy Florida, Inc. No. 5.d.iii;
8. Affidavit of Benjamin M.H. Borsch in support of supplemental response to Calpine Construction Finance Company, L.P.'s Fourth Set of Interrogatories to Duke Energy Florida, Inc. No. 14;
9. Affidavit of Benjamin M.H. Borsch in support of Duke Energy Florida, Inc.'s Second Request for Confidential Classification;
10. Affidavit of Benjamin M.H. Borsch in support of Duke Energy Florida, Inc.'s Third Request for Confidential Classification;

11. Affidavit of Benjamin M.H. Borsch in support of Duke Energy Florida, Inc.'s Fourth Request for Confidential Classification.

Respectfully submitted this 11th day of August, 2014.

John T. Burnett
Deputy General Counsel
Dianne M. Triplett
Associate General Counsel
DUKE ENERGY FLORIDA, INC.
Post Office Box 14042
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Telephone: (727) 820-5587
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/s/ Blaise N. Gamba
James Michael Walls
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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 mail and overnight mail this 11th day of August, 2014.

/s/ Blaise N. Gamba

Attorney

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Email: amy.fisher@ge.com

AFFIDAVIT

STATE OF FLORIDA)

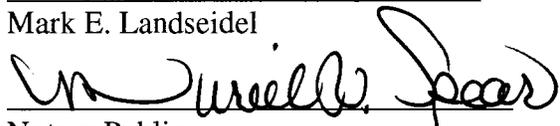
COUNTY OF PINELLAS)

I hereby certify that on this 26th day of June, 2014, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Mark E. Landseidel, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory number(s) 2a, 9a through 9e, 10a and 10b from CITIZENS' FIRST SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, INC. (NOS. 1-12) in Docket No(s). 140110-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 26th day of June, 2014.



Mark E. Landseidel



Notary Public

State of ~~Florida~~ at Large North Carolina

My Commission Expires:

October 20, 2018

AFFIDAVIT

STATE OF NORTH CAROLINA)

COUNTY OF MECKLENBURG)

I hereby certify that on this 26th day of June, 2014, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Jeffrey Patton, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory number(s) 11a, 11b and 12 from CITIZENS' FIRST SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, INC. (NOS. 1-12) in Docket No(s). 140110-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 26th day of June, 2014.



Jeffrey Patton
Jeffrey Patton

Rita G Kale
Notary Public
State of North Carolina, at Large

My Commission Expires: 6/17/2017

AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF PINELLAS)

I hereby certify that on this 2nd day of ~~June~~ July, 2014, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Benjamin M.H. Borsch, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory number(s) 1, 2b, 3a through 3c, 4a, 4b, 5, 6, 7a through 7f, 8a through 8d from CITIZENS' FIRST SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, INC. (NOS. 1-12) in Docket No(s). 140110-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 2nd day of July, 2014.

Benjamin M.H. Borsch
Benjamin M.H. Borsch

Sandra L. Brice
Notary Public
State of Florida, at Large

My Commission Expires:



AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF PINELLAS)

I hereby certify that on this 18th day of July, 2014, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Amy Dierolf, who is personally known to me, and she acknowledged before me that she provided the responses to interrogatory number(s) 30 and 31 from STAFF'S FIRST INTERROGATORIES NOS. 1-43 TO DUKE ENERGY FLORIDA, INC. in Docket No(s). 140110-EI, and that the responses are true and correct based on her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 18th day of July, 2014.

Amy Dierolf

Amy Dierolf

Jennifer Garwood

Notary Public
State of Florida, at Large

My Commission Expires: 03/22/16



AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF PINELLAS)

I hereby certify that on this 17th day of July, 2014, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Ed Scott, who is personally known to me, and he acknowledged before me that he provided the answer to interrogatory number 39 from FLORIDA PUBLIC SERVICE COMMISSION STAFF'S FIRST SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, INC. (NOS. 1-43) in Docket No. 140110-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 17th day of July, 2014.

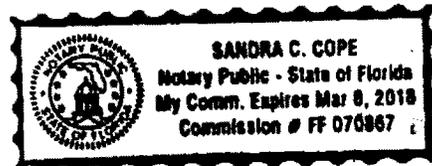


Ed Scott



Notary Public
State of Florida, at Large

My Commission Expires:



AFFIDAVIT

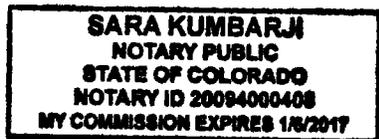
STATE OF COLORADO)

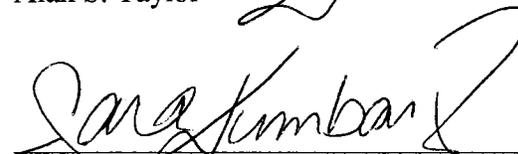
COUNTY OF BOULDER)

I hereby certify that on this 16th day of July, 2014, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Alan S. Taylor, who is personally known to me or has provided COLORADO DRIVER'S LICENSE as identification, and he acknowledged before me that he provided the responses to interrogatory numbers 40 and 41 from STAFF'S FIRST INTERROGATORIES NOS. 1-43 TO DUKE ENERGY FLORIDA, INC. in Docket No(s). 140110-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 16th day of July, 2014.


Alan S. Taylor




Notary Public
State of Colorado, at Large

My Commission Expires:

1/6/17

AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF PINELLAS)

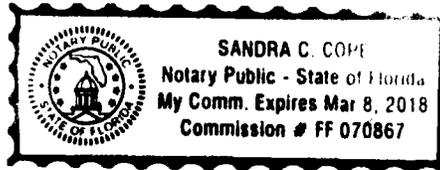
I hereby certify that on this 25th day of July, 2014, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Benjamin M.H. Borsch, who is personally known to me, and he acknowledged before me that he provided the supplemental response to interrogatory number 5.d.iii from CALPINE CONSTRUCTION FINANCE COMPANY, L.P.'S FIRST SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, INC. (NOS. 1-9) in Docket No(s). 140110-EI, and that the response is true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 25th day of July, 2014.

Benjamin M.H. Borsch
Benjamin M.H. Borsch

Sandra Cope
Notary Public
State of Florida, at Large

My Commission Expires:
3/8/18



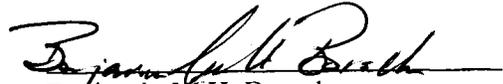
AFFIDAVIT

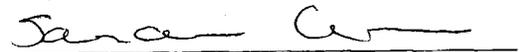
STATE OF FLORIDA)

COUNTY OF PINELLAS)

I hereby certify that on this 25th day of July, 2014, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Benjamin M.H. Borsch, who is personally known to me, and he acknowledged before me that he provided the supplemental response to interrogatory number 14 from CALPINE CONSTRUCTION FINANCE COMPANY, L.P.'S FOURTH SET OF INTERROGATORIES TO DUKE ENERGY FLORIDA, INC. (NOS. 114-15) in Docket No. 140110-EI, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 25th day of July, 2014.


Benjamin M.H. Borsch


Notary Public
State of Florida, at Large

My Commission Expires:
3/8/18



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Need for Citrus County Combined) DOCKET NO. 140110-EI
Cycle Power Plant) Submitted for filing: July 9, 2014
_____)

AFFIDAVIT OF BENJAMIN M.H. BORSCH IN SUPPORT OF DUKE ENERGY FLORIDA, INC.'S SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Benjamin M.H. Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin M.H. Borsch. 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 Director, IRP & Analytics – Florida. I am responsible for resource planning for Duke Energy Florida, Inc. I am responsible for directing the resource planning process in an integrated approach to finding the most cost-effective alternatives to meet the Company's obligation to serve its customers in Florida. As a result, we examine both supply-side and demand-side resources available and potentially available to the Company over its planning horizon, relative to the Company's load forecasts, and prepare and present documents that are filed with the Florida Public Service Commission ("FPSC" or the "Commission"), in accordance with the applicable statutory and regulatory requirements. In my capacity as the

Director, IRP & Analytics –Florida, I am responsible for the Company’s evaluation of options to meet its needs for reliable electric power prior to 2018.

3. DEF is seeking confidential classification for portions of responses to Calpine Construction Finance Company, L.P.’s First Set of Interrogatories (Nos. 1-9) and Calpine Construction Finance Company, L.P.’s First Request for Production of Documents (No. 1). A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF’s Second Request for Confidential Classification and is outlined in DEF’s Justification Matrix that is attached to DEF’s Second Request for Confidential Classification as Exhibit C.

4. DEF is requesting confidential classification of this information because it is competitively sensitive confidential business information contains DEF’s confidential and proprietary internal strategies and analysis studies and, in many cases, this information constitutes trade secrets of the Company and its contract partners. This information would adversely impact DEF’s competitive business interests if disclosed to third parties.

5. The disclosure of this information would impair the efforts of the Company to negotiate contracts on favorable terms, as well as violate contractual nondisclosure provisions of these bids. Specifically, if DEF’s suppliers or competitors were made aware of DEF’s internal strategies and analysis studies, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition and provision of goods, materials, and services. DEF must be able to ensure potential bidders that the terms of their bids will be kept confidential. If such assurances are not provided, potential bidders know that the terms of their bids are subject to public disclosure, they might withhold sensitive information necessary for the utility to fully understand and accurately assess the costs and benefits of their proposals. Persons or companies who otherwise would have submitted bids in response to the utility’s RFPs might not do so if

there is no assurance that their proposals would be protected from disclosure.

6. DEF negotiates with potential third party vendors to obtain competitive contracts for services that provide economic value to DEF and its ratepayers. In order to obtain such contracts, however, DEF must be able to assure these companies that sensitive business information will be kept confidential. DEF has kept confidential and has not publicly disclosed any of its confidential contract terms, including pricing. Absent such measures, these companies would run the risk that sensitive business information that they provided in their contracts with DEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who would otherwise contract with DEF might decide not to do so if DEF did not keep those terms of their contracts confidential. Without DEF's measures to maintain the confidentiality, the Company's efforts to obtain competitive contracts would be undermined.

7. The information identified as Exhibit A is intended to be and is treated as confidential by the Company. The information has not been disclosed to the public, and the Company has treated and continues to treat the information as confidential. Upon receipt of the proposals and contracts at issue, and with its own 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 the Company, and restricting the number of, and access to the information and contracts.

8. At no time since receiving or generating the bid proposals, contracts, and business analysis studies in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

9. This concludes my affidavit.

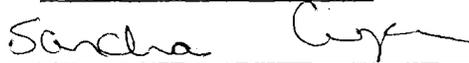
Dated the 26th day of July, 2014.



(Signature)

Benjamin M.H. Borsch
Director – IRP & Analytics – Florida
Duke Energy Florida, Inc.
299 First Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 26th day of July, 2014 by Benjamin M.H. Borsch. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.



(Signature)

Sandra Cope

(Printed Name)

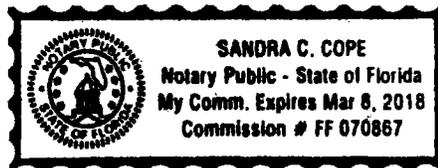
NOTARY PUBLIC, STATE OF FL

3/8/18

(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)

(Serial Number, If Any)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Need for Citrus County Combined)
Cycle Power Plant)
_____)

DOCKET NO. 140110-EI
Submitted for filing: July 15, 2014

**AFFIDAVIT OF BENJAMIN M.H. BORSCH IN SUPPORT OF DUKE ENERGY FLORIDA,
INC.'S THIRD REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Benjamin M.H. Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin M.H. Borsch. 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 Director, IRP & Analytics – Florida. I am responsible for resource planning for Duke Energy Florida, Inc. I am responsible for directing the resource planning process in an integrated approach to finding the most cost-effective alternatives to meet the Company's obligation to serve its customers in Florida. As a result, we examine both supply-side and demand-side resources available and potentially available to the Company over its planning horizon, relative to the Company's load forecasts, and prepare and present documents that are filed with the Florida Public Service Commission ("FPSC" or the "Commission"), in accordance with the applicable statutory and regulatory requirements. In my capacity as the

Director, IRP & Analytics –Florida, I am responsible for the Company’s evaluation of options to meet its needs for reliable electric power prior to 2018.

3. DEF is seeking confidential classification for portions of responses to Calpine Construction Finance Company, L.P.’s Second Set of Interrogatories, number 10a. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF’s Third Request for Confidential Classification and is outlined in DEF’s Justification Matrix that is attached to DEF’s Third Request for Confidential Classification as Exhibit C.

4. DEF is requesting confidential classification of this information because it is competitively sensitive confidential business information contains DEF’s confidential and proprietary internal strategies and analysis studies and, in many cases, this information constitutes trade secrets of the Company and its contract partners. This information would adversely impact DEF’s competitive business interests if disclosed to third parties.

5. The disclosure of this information would impair the efforts of the Company to negotiate contracts on favorable terms, as well as violate contractual nondisclosure provisions of these bids. Specifically, if DEF’s suppliers or competitors were made aware of DEF’s internal strategies and analysis studies, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition and provision of goods, materials, and services. DEF must be able to ensure potential bidders that the terms of their bids will be kept confidential. If such assurances are not provided, potential bidders know that the terms of their bids are subject to public disclosure, they might withhold sensitive information necessary for the utility to fully understand and accurately assess the costs and benefits of their proposals. Persons or companies who otherwise would have submitted bids in response to the utility’s RFPs might not do so if there is no assurance that their proposals would be protected from disclosure.

6. DEF negotiates with potential third party vendors to obtain competitive contracts for services that provide economic value to DEF and its ratepayers. In order to obtain such contracts, however, DEF must be able to assure these companies that sensitive business information will be kept confidential. DEF has kept confidential and has not publicly disclosed any of its confidential contract terms, including pricing. Absent such measures, these companies would run the risk that sensitive business information that they provided in their contracts with DEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who would otherwise contract with DEF might decide not to do so if DEF did not keep those terms of their contracts confidential. Without DEF's measures to maintain the confidentiality, the Company's efforts to obtain competitive contracts would be undermined.

7. The information identified as Exhibit A is intended to be and is treated as confidential by the Company. The information has not been disclosed to the public, and the Company has treated and continues to treat the information as confidential. Upon receipt of the proposals and contracts at issue, and with its own 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 the Company, and restricting the number of, and access to the information and contracts.

8. At no time since receiving or generating the bid proposals, contracts, and business analysis studies in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

9. This concludes my affidavit.

Dated the 26th day of July, 2014.

Benjamin M.H. Borsch

(Signature)

Benjamin M.H. Borsch
Director - IRP & Analytics - Florida
Duke Energy Florida, Inc.
299 First Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 26th day of July, 2014 by Benjamin M.H. Borsch. He is personally known to me, or has produced his driver's license, or his _____ as identification.

Sandra Cope

(Signature)

Sandra Cope

(Printed Name)

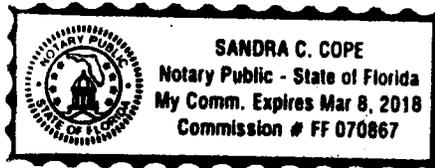
NOTARY PUBLIC, STATE OF FL

3/8/18

(Commission Expiration Date)

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Need for Citrus County Combined)
Cycle Power Plant)
_____)

DOCKET NO. 140110-EI
Submitted for filing: July 22, 2014

AFFIDAVIT OF BENJAMIN M.H. BORSCH IN SUPPORT OF DUKE ENERGY FLORIDA, INC.'S FOURTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Benjamin M.H. Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin M.H. Borsch. 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 Director, IRP & Analytics – Florida. I am responsible for resource planning for Duke Energy Florida, Inc. I am responsible for directing the resource planning process in an integrated approach to finding the most cost-effective alternatives to meet the Company's obligation to serve its customers in Florida. As a result, we examine both supply-side and demand-side resources available and potentially available to the Company over its planning horizon, relative to the Company's load forecasts, and prepare and present documents that are filed with the Florida Public Service Commission ("FPSC" or the "Commission"), in accordance with the applicable statutory and regulatory requirements.

3. DEF is seeking confidential classification for portions of responses to Citizens' First Set of Interrogatories (Nos. 1-12) and First Request for Production of Documents (Nos. 1-10). A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Fourth Request for Confidential Classification and is outlined in DEF's Justification Matrix that is attached to DEF's Fourth Request for Confidential Classification as Exhibit C.

4. DEF is requesting confidential classification of this information because it is competitively sensitive confidential business information and contains DEF's confidential and proprietary internal strategies and analysis studies or those of DEF's vendors. This information would adversely impact DEF's competitive business interests if disclosed to third parties.

5. The disclosure of this information would impair the efforts of the Company to negotiate contracts on favorable terms, as well as violate contractual nondisclosure provisions of these bids. Specifically, if DEF's suppliers or competitors were made aware of DEF's internal strategies and analysis studies, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition and provision of goods, materials, and services. DEF must be able to ensure potential bidders that the terms of their bids will be kept confidential. If such assurances are not provided, potential bidders know that the terms of their bids are subject to public disclosure, they might withhold sensitive information necessary for the utility to fully understand and accurately assess the costs and benefits of their proposals. Persons or companies who otherwise would have submitted bids in response to the utility's RFPs might not do so if there is no assurance that their proposals would be protected from disclosure.

6. DEF negotiates with potential third party vendors to obtain competitive contracts for services that provide economic value to DEF and its ratepayers. In order to obtain such

contracts, however, DEF must be able to assure these companies that sensitive business information will be kept confidential. DEF has kept confidential and has not publicly disclosed any of its confidential contract terms, including pricing. Absent such measures, these companies would run the risk that sensitive business information that they provided in their contracts with DEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who would otherwise contract with DEF might decide not to do so if DEF did not keep those terms of their contracts confidential. Without DEF's measures to maintain the confidentiality, the Company's efforts to obtain competitive contracts would be undermined.

7. The information identified as Exhibit A is intended to be and is treated as confidential by the Company. The information has not been disclosed to the public, and the Company has treated and continues to treat the information as confidential. Upon receipt of the proposals and contracts at issue, and with its own 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 the Company, and restricting the number of, and access to the information and contracts.

8. At no time since receiving or generating the bid proposals, contracts, and business analysis studies in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

9. This concludes my affidavit.

Dated the 25th day of July, 2014.

Benjamin M.H. Borsch

(Signature)

Benjamin M.H. Borsch
Director – IRP & Analytics – Florida
Duke Energy Florida, Inc.
299 First Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 25th day of July, 2014 by Benjamin M.H. Borsch. He is personally known to me, or has produced his driver's license, or his _____ as identification.

Sandra Cope

(Signature)

Sandra Cope

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF FL

3/8/18

(Commission Expiration Date)

(Serial Number, If Any)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Need for Citrus County Combined) DOCKET NO. 140110-EI
Cycle Power Plant) Submitted for filing: July 22, 2014
_____)

AFFIDAVIT OF BENJAMIN M.H. BORSCH IN SUPPORT OF DUKE ENERGY FLORIDA, INC.'S FOURTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Benjamin M.H. Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin M.H. Borsch. 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 Director, IRP & Analytics – Florida. I am responsible for resource planning for Duke Energy Florida, Inc. I am responsible for directing the resource planning process in an integrated approach to finding the most cost-effective alternatives to meet the Company's obligation to serve its customers in Florida. As a result, we examine both supply-side and demand-side resources available and potentially available to the Company over its planning horizon, relative to the Company's load forecasts, and prepare and present documents that are filed with the Florida Public Service Commission ("FPSC" or the "Commission"), in accordance with the applicable statutory and regulatory requirements.

3. DEF is seeking confidential classification for portions of responses to Citizens' First Set of Interrogatories (Nos. 1-12) and First Request for Production of Documents (Nos. 1-10). A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF's Fourth Request for Confidential Classification and is outlined in DEF's Justification Matrix that is attached to DEF's Fourth Request for Confidential Classification as Exhibit C.

4. DEF is requesting confidential classification of this information because it is competitively sensitive confidential business information and contains DEF's confidential and proprietary internal strategies and analysis studies or those of DEF's vendors. This information would adversely impact DEF's competitive business interests if disclosed to third parties.

5. The disclosure of this information would impair the efforts of the Company to negotiate contracts on favorable terms, as well as violate contractual nondisclosure provisions of these bids. Specifically, if DEF's suppliers or competitors were made aware of DEF's internal strategies and analysis studies, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition and provision of goods, materials, and services. DEF must be able to ensure potential bidders that the terms of their bids will be kept confidential. If such assurances are not provided, potential bidders know that the terms of their bids are subject to public disclosure, they might withhold sensitive information necessary for the utility to fully understand and accurately assess the costs and benefits of their proposals. Persons or companies who otherwise would have submitted bids in response to the utility's RFPs might not do so if there is no assurance that their proposals would be protected from disclosure.

6. DEF negotiates with potential third party vendors to obtain competitive contracts for services that provide economic value to DEF and its ratepayers. In order to obtain such

contracts, however, DEF must be able to assure these companies that sensitive business information will be kept confidential. DEF has kept confidential and has not publicly disclosed any of its confidential contract terms, including pricing. Absent such measures, these companies would run the risk that sensitive business information that they provided in their contracts with DEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who would otherwise contract with DEF might decide not to do so if DEF did not keep those terms of their contracts confidential. Without DEF's measures to maintain the confidentiality, the Company's efforts to obtain competitive contracts would be undermined.

7. The information identified as Exhibit A is intended to be and is treated as confidential by the Company. The information has not been disclosed to the public, and the Company has treated and continues to treat the information as confidential. Upon receipt of the proposals and contracts at issue, and with its own 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 the Company, and restricting the number of, and access to the information and contracts.

8. At no time since receiving or generating the bid proposals, contracts, and business analysis studies in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

9. This concludes my affidavit.

Dated the 25th day of July, 2014.

Benjamin M.H. Borsch

(Signature)

Benjamin M.H. Borsch
Director - IRP & Analytics - Florida
Duke Energy Florida, Inc.
299 First Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 25th day of July, 2014 by Benjamin M.H. Borsch. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

Sandra Cope

(Signature)

Sandra Cope

(Printed Name)

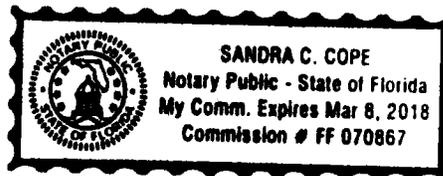
NOTARY PUBLIC, STATE OF FL

3/8/18

(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)

(Serial Number, If Any)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Need for Citrus County Combined) DOCKET NO. 140110-EI
Cycle Power Plant) Submitted for filing: July 15, 2014
_____)

**AFFIDAVIT OF BENJAMIN M.H. BORSCH IN SUPPORT OF DUKE ENERGY FLORIDA,
INC.'S THIRD REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Benjamin M.H. Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin M.H. Borsch. 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 Director, IRP & Analytics – Florida. I am responsible for resource planning for Duke Energy Florida, Inc. I am responsible for directing the resource planning process in an integrated approach to finding the most cost-effective alternatives to meet the Company's obligation to serve its customers in Florida. As a result, we examine both supply-side and demand-side resources available and potentially available to the Company over its planning horizon, relative to the Company's load forecasts, and prepare and present documents that are filed with the Florida Public Service Commission ("FPSC" or the "Commission"), in accordance with the applicable statutory and regulatory requirements. In my capacity as the

Director, IRP & Analytics –Florida, I am responsible for the Company’s evaluation of options to meet its needs for reliable electric power prior to 2018.

3. DEF is seeking confidential classification for portions of responses to Calpine Construction Finance Company, L.P.’s Second Set of Interrogatories, number 10a. A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF’s Third Request for Confidential Classification and is outlined in DEF’s Justification Matrix that is attached to DEF’s Third Request for Confidential Classification as Exhibit C.

4. DEF is requesting confidential classification of this information because it is competitively sensitive confidential business information contains DEF’s confidential and proprietary internal strategies and analysis studies and, in many cases, this information constitutes trade secrets of the Company and its contract partners. This information would adversely impact DEF’s competitive business interests if disclosed to third parties.

5. The disclosure of this information would impair the efforts of the Company to negotiate contracts on favorable terms, as well as violate contractual nondisclosure provisions of these bids. Specifically, if DEF’s suppliers or competitors were made aware of DEF’s internal strategies and analysis studies, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition and provision of goods, materials, and services. DEF must be able to ensure potential bidders that the terms of their bids will be kept confidential. If such assurances are not provided, potential bidders know that the terms of their bids are subject to public disclosure, they might withhold sensitive information necessary for the utility to fully understand and accurately assess the costs and benefits of their proposals. Persons or companies who otherwise would have submitted bids in response to the utility’s RFPs might not do so if there is no assurance that their proposals would be protected from disclosure.

6. DEF negotiates with potential third party vendors to obtain competitive contracts for services that provide economic value to DEF and its ratepayers. In order to obtain such contracts, however, DEF must be able to assure these companies that sensitive business information will be kept confidential. DEF has kept confidential and has not publicly disclosed any of its confidential contract terms, including pricing. Absent such measures, these companies would run the risk that sensitive business information that they provided in their contracts with DEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who would otherwise contract with DEF might decide not to do so if DEF did not keep those terms of their contracts confidential. Without DEF's measures to maintain the confidentiality, the Company's efforts to obtain competitive contracts would be undermined.

7. The information identified as Exhibit A is intended to be and is treated as confidential by the Company. The information has not been disclosed to the public, and the Company has treated and continues to treat the information as confidential. Upon receipt of the proposals and contracts at issue, and with its own 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 the Company, and restricting the number of, and access to the information and contracts.

8. At no time since receiving or generating the bid proposals, contracts, and business analysis studies in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

9. This concludes my affidavit.

Dated the 26th day of July, 2014.

Benjamin M.H. Borsch

(Signature)

Benjamin M.H. Borsch
Director – IRP & Analytics – Florida
Duke Energy Florida, Inc.
299 First Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 26th day of July, 2014 by Benjamin M.H. Borsch. He is personally known to me, or has produced his driver's license, or his _____ as identification.

Sandra Cope

(Signature)

Sandra Cope

(Printed Name)

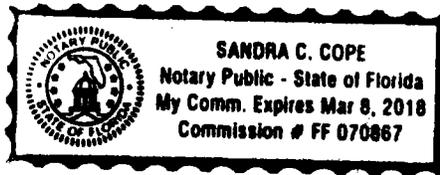
NOTARY PUBLIC, STATE OF FL

3/8/18

(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)

(Serial Number, If Any)



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Need for Citrus County Combined)
Cycle Power Plant)
_____)

DOCKET NO. 140110-EI
Submitted for filing: July 9, 2014

**AFFIDAVIT OF BENJAMIN M.H. BORSCH IN SUPPORT OF DUKE ENERGY FLORIDA,
INC.'S SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Benjamin M.H. Borsch, who being first duly sworn, on oath deposes and says that:

1. My name is Benjamin M.H. Borsch. 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 Director, IRP & Analytics – Florida. I am responsible for resource planning for Duke Energy Florida, Inc. I am responsible for directing the resource planning process in an integrated approach to finding the most cost-effective alternatives to meet the Company's obligation to serve its customers in Florida. As a result, we examine both supply-side and demand-side resources available and potentially available to the Company over its planning horizon, relative to the Company's load forecasts, and prepare and present documents that are filed with the Florida Public Service Commission ("FPSC" or the "Commission"), in accordance with the applicable statutory and regulatory requirements. In my capacity as the

Director, IRP & Analytics –Florida, I am responsible for the Company’s evaluation of options to meet its needs for reliable electric power prior to 2018.

3. DEF is seeking confidential classification for portions of responses to Calpine Construction Finance Company, L.P.’s First Set of Interrogatories (Nos. 1-9) and Calpine Construction Finance Company, L.P.’s First Request for Production of Documents (No. 1). A detailed description of the confidential information at issue is contained in confidential Exhibit A to DEF’s Second Request for Confidential Classification and is outlined in DEF’s Justification Matrix that is attached to DEF’s Second Request for Confidential Classification as Exhibit C.

4. DEF is requesting confidential classification of this information because it is competitively sensitive confidential business information contains DEF’s confidential and proprietary internal strategies and analysis studies and, in many cases, this information constitutes trade secrets of the Company and its contract partners. This information would adversely impact DEF’s competitive business interests if disclosed to third parties.

5. The disclosure of this information would impair the efforts of the Company to negotiate contracts on favorable terms, as well as violate contractual nondisclosure provisions of these bids. Specifically, if DEF’s suppliers or competitors were made aware of DEF’s internal strategies and analysis studies, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition and provision of goods, materials, and services. DEF must be able to ensure potential bidders that the terms of their bids will be kept confidential. If such assurances are not provided, potential bidders know that the terms of their bids are subject to public disclosure, they might withhold sensitive information necessary for the utility to fully understand and accurately assess the costs and benefits of their proposals. Persons or companies who otherwise would have submitted bids in response to the utility’s RFPs might not do so if

there is no assurance that their proposals would be protected from disclosure.

6. DEF negotiates with potential third party vendors to obtain competitive contracts for services that provide economic value to DEF and its ratepayers. In order to obtain such contracts, however, DEF must be able to assure these companies that sensitive business information will be kept confidential. DEF has kept confidential and has not publicly disclosed any of its confidential contract terms, including pricing. Absent such measures, these companies would run the risk that sensitive business information that they provided in their contracts with DEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who would otherwise contract with DEF might decide not to do so if DEF did not keep those terms of their contracts confidential. Without DEF's measures to maintain the confidentiality, the Company's efforts to obtain competitive contracts would be undermined.

7. The information identified as Exhibit A is intended to be and is treated as confidential by the Company. The information has not been disclosed to the public, and the Company has treated and continues to treat the information as confidential. Upon receipt of the proposals and contracts at issue, and with its own 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 the Company, and restricting the number of, and access to the information and contracts.

8. At no time since receiving or generating the bid proposals, contracts, and business analysis studies in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

9. This concludes my affidavit.

Dated the 26th day of July, 2014.

Benjamin M.H. Borsch

(Signature)

Benjamin M.H. Borsch
Director – IRP & Analytics – Florida
Duke Energy Florida, Inc.
299 First Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 26th day of July, 2014 by Benjamin M.H. Borsch. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

Sandra Cope

(Signature)

Sandra Cope

(Printed Name)

NOTARY PUBLIC, STATE OF FL

3/8/18

(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)

(Serial Number, If Any)

