

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Duke Energy Florida, LLC's Petition for a limited proceeding to approve first solar base rate adjustment

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Docket No. 20180149-EI

Filed: April 9, 2019

**NOTICE OF FILING VERIFIED AFFIDAVIT**

Duke Energy Florida, LLC, ("DEF") hereby gives notice of filing the verified affidavit of Matthew G. Stout in support of DEF's Request for Confidential Classification for the confidential information provided in DEF's Response to Staff's Second Set of Interrogatories (Nos. 41-50), filed on March 18, 2019.

This 9<sup>th</sup> day of April, 2019.

Respectfully submitted,

/s/ Dianne M. Triplett

**DIANNE M. TRIPLETT**

Deputy General Counsel  
Duke Energy Florida, LLC  
299 First Avenue North  
St. Petersburg, FL 33701  
T: 727.820.4692  
F: 727.820.5041  
E: [Dianne.Triplett@Duke-Energy.com](mailto:Dianne.Triplett@Duke-Energy.com)

**MATTHEW R. BERNIER**

Associate General Counsel  
Duke Energy Florida, LLC  
106 E. College Avenue, Suite 800  
Tallahassee, FL 32301  
T: 850.521.1428  
F: 727.820.5041  
E: [Matthew.Bernier@Duke-Energy.com](mailto:Matthew.Bernier@Duke-Energy.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 9<sup>th</sup> day of April, 2019.

/s/ Dianne M. Triplett

Attorney

<p>Jennifer Crawford Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:jcrawfor@psc.state.fl.us">jcrawfor@psc.state.fl.us</a></p> <p>J. R. Kelly / C. Rehwinkel Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399 <a href="mailto:kelly.jr@leg.state.fl.us">kelly.jr@leg.state.fl.us</a> <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a></p>	<p>Jon C. Moyle, Jr. / Karen A. Putnal Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, FL 32301 <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a> <a href="mailto:kputnal@moylelaw.com">kputnal@moylelaw.com</a></p> <p>James W. Brew / Laura A. Wynn 1025 Thomas Jefferson Street, N.W. Washington, DC 20007 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:law@smxblaw.com">law@smxblaw.com</a></p>
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Petition for a Limited Proceeding to  
Approve First Solar Base Rate Adjustment,  
By Duke Energy Florida, LLC

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Docket No. 20180149-EI

Dated: April 8, 2019

**AFFIDAVIT OF MATTHEW G. STOUT IN SUPPORT OF  
DUKE ENERGY FLORIDA'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF VERMONT

COUNTY OF WINDSOR

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

1. My name is Matthew G. Stout. I am over the age of 18 years old and I have been authorized by Duke Energy Florida, LLC (hereinafter "DEF" or the "Company") to give this affidavit in the above-styled proceeding on DEF's behalf and in support of DEF's Request for Confidential Classification (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Managing Director of Business Development for Wind and Solar Development within the RGD Business Development Department. This department is responsible for the development of new solar facilities for DEF.

3. As the Managing Director of Business Development for Wind and Solar Development, I am responsible, along with the other members of the department, for conducting solar development activities including project siting, land acquisition, resource assessment,

permitting, obtaining interconnection rights, project layout and design, and arranging contracts for engineering, procurement and construction, as well as originating, structuring, and executing transactions to acquire rights to existing solar development projects.

4. DEF is seeking confidential classification for information contained in its Response to Staff's Second Set of Interrogatories (Nos. 41-50), submitted on February 25, 2019 and Amended on March 5, 2019. The confidential information at issue is contained in confidential Exhibit A to DEF's Request and is outlined in DEF's Justification Matrix that is attached to DEF's Request for Confidential Classification as Exhibit C. DEF is requesting confidential classification of this information because it contains sensitive business information, the disclosure of which would impair the Company's efforts to contract for goods and services on favorable terms.

5. Additionally, the disclosure of confidential information contained in DEF's land purchase contracts and other such documents could adversely impact DEF's competitive business interests. The terms of these contracts, including pricing terms, are negotiated terms between DEF and the sellers of the properties. If such information was disclosed to prospective sellers of property in the marketplace, it would provide valuable insight into prices that DEF may be willing to pay in certain circumstances, thereby materially harming DEF's ability to negotiate competitive contracts in the future. DEF's efforts to obtain competitive contracts that provide economic value to both DEF and its customers could be compromised. Without DEF's measures to maintain the confidentiality of sensitive terms in contracts between DEF and sellers, the Company's efforts to obtain competitive contracts could be undermined.

6. Upon receipt of confidential information from suppliers, 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. At no time since receiving the contracts and information in question has the Company publicly disclosed that information or contracts. The Company has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

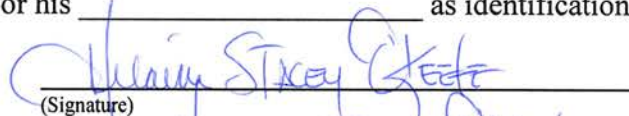
Further affiant sayeth not.

Dated the 8<sup>th</sup> day of April, 2019.



Matthew G. Stout  
Managing Director of Business Development for  
Wind and Solar Development  
Duke Energy Corporation  
400 South Tryon  
Charlotte, North Carolina 28202

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 8 day of April, 2019, by Matthew G. Stout. He is personally known to me, or has produced his VT 62551143 6/1/19 driver's license, or his \_\_\_\_\_ as identification.



(Signature)

HELAINE STACEY O'KEEFE

(Printed Name)

NOTARY PUBLIC,  
STATE OF VERMONT

11/31/2019

(Commission Expiration Date)

157.0010807

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

