



Matthew R. Bernier  
ASSOCIATE GENERAL COUNSEL

July 14, 2025

**VIA ELECTRONIC FILING**

Mr. Adam Teitzman, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: *Storm Protection Plan Cost Recovery Clause; Docket No. 20250010-EI*

Dear Mr. Teitzman:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC ("DEF"), DEF's Request for Confidential Classification for certain information contained in DEF's Response to Staff's Second Set of Interrogatories (Nos. 13-20). The filing includes the following:

- DEF's Request for Confidential Classification
- Slip-sheet for confidential Exhibit A
- Redacted Exhibit B (two copies)
- Exhibit C (justification matrix), and
- Exhibit D (affidavits of Robert Brong)

DEF's confidential Exhibit A that accompanies the above-referenced filing was submitted under separate cover.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Sincerely,

*/s/Matthew R. Bernier*

Matthew R. Bernier

MRB/mh  
Attachments

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Storm Protection Plan Cost Recovery  
Clause

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Docket No. 20250010-EI

Dated: July 14, 2025

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

Duke Energy Florida, LLC (“DEF” or “Company”), pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), submits this Request for Confidential Classification for certain information provided in its response to the Staff of the Florida Public Service Commission’s (“Staff”) Second Set of Interrogatories (Nos. 13-20), served simultaneously with this Request for Confidential Classification. In support of this Request, DEF states:

1. DEF’s Response to Second Set of Interrogatories (Nos. 13-20), specifically question 17, contains “proprietary confidential business information” under § 366.093(3), Florida Statutes.

2. The following exhibits are included with this request:

(a) Sealed Composite Exhibit A is a package containing unredacted copies of all the information for which DEF seeks confidential treatment. Composite Exhibit A was submitted separately in a sealed envelope labeled “CONFIDENTIAL” on July 14, 2025. In the unredacted versions, the information asserted to be confidential is highlighted in yellow.

(b) Composite Exhibit B is a package containing two copies of redacted versions of the information for which the Company requests confidential classification. The

specific information for which confidential treatment is requested has been blocked out by opaque marker or other means.

(c) Exhibit C is a table which identifies by page and line the information for which DEF seeks confidential classification and the specific statutory bases for seeking confidential treatment.

3. As indicated in Exhibit C, the information for which DEF requests confidential classification is “proprietary confidential business information” within the meaning of Section 366.093(3), F.S. Specifically, the information at issue includes the Company’s internal processes, procedures, policies, and guidelines, the disclosure of the information would allow vendors to have insight into DEF’s internal policies and guidelines and result in greater prices in future negotiations which would impair the Company’s competitive business interests and efforts to contract for goods and services on favorable terms. *See* § 366.093(3)(d) & (e), F.S.; Affidavit of Robert Brong at ¶¶ 3, 4 and 5. Accordingly, such information constitutes “proprietary confidential business information” which is exempt from disclosure under the Public Records Act pursuant to Section 366.093(1), F.S.

4. The information identified as Exhibit “A” is intended to be and is treated as confidential by the Company. *See* Affidavit of Robert Brong at ¶ 6. The information has not been disclosed to the public, and the Company has treated and continues to treat the information at issue as confidential. *See* Affidavit of Robert Brong at ¶¶ 5 and 6.

5. DEF requests that the information identified in Exhibit A be classified as “proprietary confidential business information” within the meaning of section 366.093(3), F.S., that the information remain confidential for a period of at least 18 months as provided in section

366.093(4) F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

WHEREFORE, for the foregoing reasons, DEF respectfully requests that this Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 14<sup>th</sup> day of July, 2025.

/s/Matthew R. Bernier

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Attorneys for Duke Energy Florida, LLC

**CERTIFICATE OF SERVICE**  
**Docket No. 20250010-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the following by electronic mail this 14<sup>th</sup> day of July, 2025, to all parties of record as indicated below.

/s/ Matthew R. Bernier  
Attorney

<p>Shaw Stiller / Daniel Dose / Jennifer Crawford Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:sstiller@psc.state.fl.us">sstiller@psc.state.fl.us</a> <a href="mailto:ddose@psc.state.fl.us">ddose@psc.state.fl.us</a> <a href="mailto:jrcrawfor@psc.state.fl.us">jrcrawfor@psc.state.fl.us</a> <a href="mailto:discovery-gcl@psc.state.fl.us">discovery-gcl@psc.state.fl.us</a></p> <p>Kenneth Hoffman Florida Power &amp; Light 134 West Jefferson St. Tallahassee, FL 32301-1713 <a href="mailto:ken.hoffman@fpl.com">ken.hoffman@fpl.com</a></p> <p>Christopher T. Wright Florida Power &amp; Light 700 Universe Boulevard (JB/LAW) Juno Beach FL 33408-0420 <a href="mailto:christopher.wright@fpl.com">christopher.wright@fpl.com</a></p> <p>Peter J. Mattheis / Michael K. Lavanga / Joseph R. Briscar Stone Mattheis Xenopoulos &amp; Brew, PC NUCOR 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007 <a href="mailto:pjm@smxblaw.com">pjm@smxblaw.com</a> <a href="mailto:mkl@smxblaw.com">mkl@smxblaw.com</a> <a href="mailto:jrb@smxblaw.com">jrb@smxblaw.com</a></p>	<p>Beth Keating Gunster, Yoakley &amp; Stewart, P.A. Florida Public Utilities Company 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 <a href="mailto:bkeating@gunster.com">bkeating@gunster.com</a></p> <p>Michelle Napier / Jowi Baugh Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, Florida 33411 <a href="mailto:mnapier@fpuc.com">mnapier@fpuc.com</a> <a href="mailto:jbaugh@chpk.com">jbaugh@chpk.com</a></p> <p>Jon C. Moyle Jr. Moyle Law Firm FIPUG 118 North Gadsden St. Tallahassee, FL 32301 <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a></p> <p>James W. Brew / Laura Wynn Baker / Sarah B. Newman Stone Mattheis Xenopoulos &amp; Brew, P.C. PCS Phosphate –White Springs 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:lwb@smxblaw.com">lwb@smxblaw.com</a> <a href="mailto:sbn@smxblaw.com">sbn@smxblaw.com</a></p>	<p>W. Trierweiler / P. Christensen / C. Rehwinkel / M. Wessling / O. Ponce/ A. Watrous Office of Public Counsel 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 <a href="mailto:trierweiler.walt@leg.state.fl.us">trierweiler.walt@leg.state.fl.us</a> <a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a> <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a> <a href="mailto:wessling.mary@leg.state.fl.us">wessling.mary@leg.state.fl.us</a> <a href="mailto:ponce.octavio@leg.state.fl.us">ponce.octavio@leg.state.fl.us</a> <a href="mailto:watrous.austin@leg.state.fl.us">watrous.austin@leg.state.fl.us</a></p> <p>Paula K. Brown Tampa Electric Company Regulatory Affairs P.O. Box 11 Tampa, FL 33601-0111 <a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a></p> <p>J. Wahlen / M. Means / V. Ponder Ausley McMullen Tampa Electric Company P.O. Box 391 Tallahassee, FL 32302 <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a> <a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a> <a href="mailto:vponder@ausley.com">vponder@ausley.com</a></p>
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# **Exhibit A**

**“CONFIDENTIAL”**

**(submitted on July 14, 2025, under separate cover)**

# **Exhibit B**

**REDACTED**

**(Copy one)**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Storm protection plan cost recovery  
clause.

Docket No. 20250010-EI

Dated: July 14, 2025

**DUKE ENERGY FLORIDA, LLC'S REDACTED RESPONSE TO  
STAFF'S SECOND SET OF INTERROGATORIES (NOS. 13-20)**

Duke Energy Florida, LLC ("DEF") responds to the Staff of the Florida Public Service Commission's ("Staff") Second Set of Interrogatories to DEF (Nos. 13-20) as follows:

**INTERROGATORIES**

17. Please refer to page 5, lines 13-15 of Witness Brong's May 1, 2025, testimony. Witness Brong states that DEF is evaluating long-term strategies to mitigate material and labor availability. Please elaborate on which specific strategies DEF is using to mitigate material and labor availability.

**Response:**

DEF is actively implementing several strategies to mitigate material and labor availability challenges as part of its long-term supply chain resilience efforts. These strategies include:

**REDACTED**

**Materials**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



**Labor**

[REDACTED]

[REDACTED]

[REDACTED]

Through Duke Energy Florida's efforts and efficiencies, market and evaluation time has been reduced.

# **Exhibit B**

**REDACTED**

**(Copy two)**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Storm protection plan cost recovery  
clause.

Docket No. 20250010-EI

Dated: July 14, 2025

**DUKE ENERGY FLORIDA, LLC'S REDACTED RESPONSE TO  
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**Response:**

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**REDACTED**

**Materials**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Labor**

[REDACTED]

[REDACTED]

[REDACTED]

Through Duke Energy Florida's efforts and efficiencies, market and evaluation time has been reduced.

## Exhibit C

### DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
DEF's Response to Staff's Second Set of Interrogatories (Nos. 13-20), specifically question 17	Q 17: All information after "Material" and before "Labor" and all information after "Labor" and before "Through" is confidential.	<p>§366.093(3)(d), F.S. The information in question contains confidential 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), F.S. The information in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

# **Exhibit D**

## **AFFIDAVIT OF ROBERT BRONG**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Storm Protection Plan Cost Recovery  
Clause

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Docket No. 20250010-EI

Dated: July 14, 2025

**AFFIDAVIT OF ROBERT BRONG IN SUPPORT OF  
DUKE ENERGY FLORIDA, LLC'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF SEMINOLE

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

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

2. I am the Director of Power Grid Operations Project Management in the Transmission Department. This department is responsible for the execution of capital projects for grid updates across Duke Energy Florida.

3. DEF is seeking confidential classification for certain information provided in its response to Staff's Second Set of Interrogatories (Nos. 13-20), specifically question 17. 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 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 competitive business interests and ability to contract for goods and services on favorable terms.

4. The confidential information at issue relates to proprietary and confidential internal processes, procedures, policies, and guidelines. DEF must ensure that sensitive business information is kept confidential, the disclosure of which would impair the Company's competitive interests and ability to contract on favorable terms.

5. Further, if the information at issue was disclosed, DEF's efforts to obtain contracts that provide economic value to both DEF and its customers could be compromised – harming DEF's ability to prudently operate its business. DEF has not publicly disclosed the information. Without DEF's measures to maintain the confidentiality of this sensitive business information, the Company's efforts to obtain competitive contracts could be undermined and could detrimentally impact DEF's ability to negotiate favorable contracts.

6. Upon receipt of its own confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the information provided, including restricting access to those people who need the information to assist the Company, and restricting the number of, and access to the information. At no time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 10<sup>th</sup> day of July, 2025.

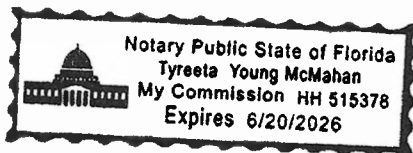
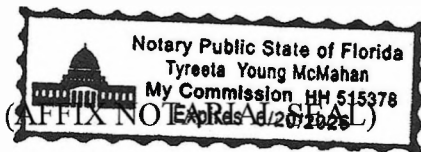


Robert Brong  
(Signature)

Robert Brong

Director, PGO Project Management

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 10<sup>th</sup> day of July, 2025 by Robert Brong. He is personally known to me or has produced his X driver's license, or his \_\_\_\_\_ as identification.



Tyresta Young McMahan  
(Signature)

(Printed Name)

NOTARY PUBLIC, STATE OF FL

6/20/2026  
(Commission Expiration Date)

\_\_\_\_\_  
(Serial Number, If Any)