



Stephanie A. Cuello
SENIOR COUNSEL

October 16, 2025

VIA ELECTRONIC FILING

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

Mr. Teitzman:

Re: Fuel and purchased power cost recovery clause with generating performance incentive factor; Docket No. 20250001-EI

Dear Mr. Teitzman:

Please find enclosed for electronic filing on behalf of Duke Energy Florida, LLC's ("DEF"), Request for Confidential Classification for certain document provided in response to SACE's First Request for Production of Documents (1-11), specifically question 10. 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 (affidavit of Jim McClay)

DEF's confidential Exhibit A that accompanies the above-referenced was submitted with DEF's Notice of Intent to Request Confidential Classification on September 25, 2025, under separate cover.

Thank you for your assistance in this matter and if you have any questions, please feel free to contact me at (850) 521-1425.

Sincerely,

/s/ Stephanie A. Cuello

Stephanie A. Cuello

SAC/mh
Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery
Clause with generating performance incentive
Factor

Docket No. 20250001-EI

Dated: October 16, 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 DEF’s Response to Southern Alliance for Clean Energy’s (“SACE”) First Request for Production of Documents (Nos. 1-11), served on September 25, 2025, concurrently with DEF’s Notice of Intent to Request Confidential Classification. This Request is timely. *See* Rule 25-22.006(3)(a)1, F.A.C. In support of this Request, DEF states:

1. DEF’s Response to SACE’s First Request for Production of Documents (Nos. 1-11), specifically number 10, 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 an unredacted copy of all the documents for which DEF seeks confidential treatment. In the unredacted version, the information asserted to be confidential is highlighted in yellow. Composite Exhibit A was submitted separately in a sealed envelope labeled “CONFIDENTIAL” on September 25, 2025, with DEF’s Notice of Intent to Request Confidential Classification. 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 documents for which the Company requests confidential classification, or slip-sheets for documents which are confidential in their entirety. 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 the information for which DEF seeks confidential classification and the specific statutory bases for seeking confidential treatment.

(d) Exhibit D is an affidavit attesting to the confidential nature of information identified in this request.

3. As indicated in Exhibit C, the information for which DEF requests confidential classification is “proprietary confidential business information” within the meaning of § 366.093(3), F.S. Specifically, the documents provided in response to Request number 10, contains proprietary confidential contractual third-party information. The disclosure of that information to the public would adversely impact DEF and third-party vendors’ competitive business interests and ability to contract for goods or services on favorable terms. *See* §§ 366.093(3)(d) & (e), F.S.; Affidavit of Jim McClay at ¶¶ 4, 5, and 6. Accordingly, such information constitutes “proprietary confidential business information” which is exempt from disclosure under the Public Records Act pursuant to § 366.093(1), F.S.

4. If DEF cannot maintain the confidentiality of third-party vendor’s proprietary information, it will be less likely that DEF can secure contracts that benefit its customers. *See* Affidavit of Jim McClay at ¶¶ 5 and 6. *Id.*

5. The information identified as Exhibit “A” is intended to be and is treated as confidential by the Company. *See* Affidavit of Jim McClay at ¶¶ 4, 5, and 6. The information has not been disclosed to the public, and the Company and third-party vendors have treated and continue to treat this information as confidential. *Id.*

6. DEF requests that the information identified in Exhibit A be classified as “proprietary confidential business information” within the meaning of § 366.093(3), F.S., that the information remains confidential for a period of at least 18 months as provided in § 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 16th day of October, 2025.

/s/ Stephanie A Cuello

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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 16th day of October, 2025.

/s/ Stephanie A. Cuello

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Exhibit A

CONFIDENTIAL

**PREVIOUSLY SUBMITTED UNDER SEPARATE COVER
DOCUMENT NUMBER 13992-2025**

Exhibit B
(Copy One)

REDACTED

REDACTED

DOCUMENTS BEARING BATES NUMBERS 20250001-DEF-000008 THROUGH 20250001-
DEF-000403 ARE CONFIDENTIAL IN THEIR ENTIRETY

Exhibit B
(Copy Two)

REDACTED

REDACTED

DOCUMENTS BEARING BATES NUMBERS 20250001-DEF-000008 THROUGH 20250001-
DEF-000403 ARE CONFIDENTIAL IN THEIR ENTIRETY

Exhibit C

DUKE ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
DEF's Response to SACE's First Request for Production of Documents (Nos. 1-11), specifically Question 10	Question 10: Documents bearing Bates numbers 20250001-DEF-000008 through 20250001-DEF-000403 are confidential in their entirety.	§ 366.093(3)(d), F.S. The document in question contains confidential information, the disclosure of which would impair DEF's efforts to contract for goods or services on favorable terms. § 366.093(3)(e), F.S. The document in question contains confidential information, the disclosure of which would impair DEF's competitive interests, the disclosure would impair the competitive business.

Exhibit D

AFFIDAVIT OF JIM MCCLAY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost
recovery clause with generating
performance incentive factor.

Docket No. 20250001-EI

Dated: October 16, 2025

**AFFIDAVIT OF JIM MCCLAY IN SUPPORT OF
DUKE ENERGY FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

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

1. My name is James McClay. 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 Second Request for Extension of Confidential Classification (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Managing Director of Natural Gas Trading. This section is responsible for natural gas trading, optimization, and scheduling function for the regulated gas-fired generation assets for the Duke Energy Indiana ("DEI"), Duke Energy

Kentucky (“DEK”), Duke Energy Carolinas (“DEC”), Duke Energy Progress (“DEP”), and DEF Systems.

3. As the Managing Director of Natural Gas Trading, I am responsible, along with the other members of the section, for the management of the financial hedging activities, natural gas, and oil procurement, needed to support the gas generation needs for DEI, DEK, DEC, DEF, and DEP.

4. DEF is seeking confidential classification for certain documents provided in response to Southern Alliance for Clean Energy’s (“SACE”) First Request for Production of Documents (Nos. 1-11), specifically question 10. 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.

5. In order to contract with third-party vendors on favorable terms, DEF must keep contractual terms and third-party proprietary information confidential. The disclosure would be to the detriment of DEF and its customers. DEF takes affirmative steps to prevent the disclosure of this information to the public, as well as limiting its dissemination within the Company to those employees with a need to access the information to provide their job responsibilities. Absent such measures, third-party vendors would run the risk that sensitive business information that they provided 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 specific information confidential. Without DEF's measures to maintain the confidentiality of sensitive terms in contracts, the Company's efforts to obtain competitive contracts could be undermined.

6. Further, if DEF cannot demonstrate that may enter contracts with DEF in the future, that DEF has the ability to protect those third-parties' confidential and proprietary business information, third-parties will be less likely to provide that information to DEF – 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, DEF's ability to contract with third-parties could detrimentally impact DEF's ability to negotiate favorable contracts, as third-parties may begin to demand a "premium" to do business with DEF to account for the risk that its proprietary information will become a matter of public record, thereby harming DEF's competitive interests and ultimately its customers' financial interests.

7. Upon receipt of 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 information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

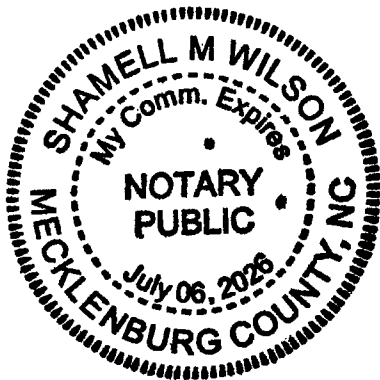
Further affiant sayeth not.

Dated the 14th day of October, 2025.

Jim McClay
(Signature)
Jim McClay
Managing Director – Natural Gas Trading
Duke Energy
525 South Church
Charlotte, NC 28202

14th THE FOREGOING INSTRUMENT was sworn to and subscribed before me this
day of October, 2025 by Jim McClay. He is personally known to me or has
produced his North Carolina driver's license, or his _____
as identification.

(AFFIX NOTARIAL SEAL)



Shamell M. Wilson
(Signature)
shamell m. wilson
(Printed Name)
NOTARY PUBLIC, STATE OF NC
July 06, 2026
(Commission Expiration Date)

(Serial Number, If Any)