

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by
Progress Energy Florida, Inc.

Docket No. 050078-EI
Submitted for filing July 6, 2005

AFFIDAVIT OF LORI CROSS IN SUPPORT OF
PROGRESS ENERGY FLORIDA'S
FIFTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

COUNTY OF PINELLAS

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

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

CMP _____

COM _____

CTR _____

ECR 1

GCL 1

OPC _____

MMS _____

RCA _____

SCR _____

SEC 1

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records

2. I am the Manager, Regulatory Accounting – Florida. This department is
responsible for the regulatory accounting and reporting activities of Progress Energy
Florida, Inc.

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3. As PEF's Manager of Regulatory Accounting, I help prepare, use, and am familiar with PEF's projected budgets and budget variance reports as well as certain of PEF's internal business plans, strategies, and analyses.

4. In its Fifth Request for Confidential Classification, PEF is seeking confidential classification for portions of its responses to OPC's Fifth Request for Production (Nos. 126-144). The information which PEF seeks confidential classification is more specifically described in Attachment C to PEF's Fifth Request for Confidential Classification.

5. Portions of PEF's responses to OPC's Fifth Request for Production Numbers 127, 128, and 130 contain confidential information relating to PEF's business strategies and budgets and, thereby, the disclosure of such sensitive business information to the public would adversely impact PEF's competitive business interest. If PEF's suppliers or competitors were made aware of PEF's business strategies and/or budgets, 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. Specifically, PEF's suppliers and providers may decrease supply of such equipment or materials, and/or increase the cost and prices of such goods. Additionally, PEF's competitors may adjust their consumption behavior in the market, thereby potentially making goods and services less available and more expensive to PEF.

6. With respect to the confidential information at issue, strict procedures are established and followed to maintain the confidentiality of that information, including restricting access to those persons who need information to assist the Company, and restricting the number of those who have access to the information. At no time 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 this 5th day of July, 2005

Lori J. Cross
(Signature)

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 5th day of July, 2005 by Lori Cross. He is personally known to me, or has produced his driver's license as identification.

Suzanne H. Miller
(Signature)

SUZANNE H. MILLER
(Printed Name)

NOTARY PUBLIC, STATE OF _____

(Commission Expiration Date)

