## ORIGINAL

RECEIVED-EPSC

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

06 OCT -9 PM 1: 26

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

COMMISSION CLERK

Docket No. 060001-EI

Dated: October 9, 2006

## AFFIDAVIT OF JOSEPH F. McCALLISTER IN SUPPORT OF PROGRESS ENERGY FLORIDA'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF NORTH CAROLINA

ENED& FILED

UREAU OF RECORDS

COUNTY OF WAKE

1.

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

My name is Joseph F. McCallister. I am over the age of 18 years old and I

	have been authorized by Progress Energy Florida (hereinafter "PEF" or the "Company")
MP	to give this affidavit in the above-styled proceeding on PEF's behalf and in support of
СОМ	PEF's Request for Confidential Classification. The facts attested to in my affidavit are
CTR ECR	based upon my personal knowledge.
3CL	2. I am the Director of Gas and Oil Trading in the Regulated Fuels
OPC RCA	Department. This section is responsible for natural gas and fuel oil acquisition for both
SCR	PEF and Progress Energy Carolinas ("PEC") systems.
SGA	3. As the Director of Gas and Oil Trading, I am responsible, along with the
SEC L	other members of the section, for the management of the gas and oil procurement,
Vera	rd-

DOCUMENT NUMBER - DATE

09321 OCT-98

FPSC-COMMISSION CLERK

transportation, hedging activities and administration of gas and oil contracts with various suppliers for PEF's and PEC's electrical power generation facilities.

- 4. PEF is seeking confidential classification for portions of its responses to OPC's Twelfth Request for Production of Documents (No. 53). A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's Request for Confidential Classification as Exhibit C. PEF is requesting confidential classification of this information because it contains proprietary confidential business information of PEF.
- 5. PEF negotiates with potential fuel suppliers to obtain competitive hedging pricing for fuel that provides economic value to PEF and its ratepayers. In order to obtain such contracts, however, PEF must be able to assure fuel suppliers that sensitive business information, such as hedging prices, strategies and cost analyses, will be kept confidential. With respect to the information at issue in this Request, PEF has kept confidential and has not publicly disclosed confidential company information such as hedging strategies and cost analyses. Absent such measures, PEF and potential fuel suppliers would run the risk that sensitive business information 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 otherwise would contract with PEF might decide not to do so if PEF did not keep those terms of their contracts confidential. Without PEF's measures to maintain the confidentiality of sensitive terms in contracts between PEF and fuel suppliers, the Company's efforts to obtain competitive hedging contracts could be undermined.

- 6. Additionally, the disclosure of confidential information in PEF's fuel hedging strategies could adversely impact PEF's competitive business interests. If such information was disclosed to PEF's competitors, PEF's efforts to obtain competitive hedging contracts that provide economic value to both PEF and its ratepayers could be compromised by PEF's competitors changing their behavior within the relevant markets.
- 7. Upon receipt of confidential information from fuel 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 and contracts at issue as confidential.
  - 8. This concludes my affidavit.

Further affiant sayeth not.

Dated the day of October, 2006.