

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination of need
for Levy Units 1 and 2 nuclear power plants,
by Progress Energy Florida, Inc.

Docket No. 080148-EI

Submitted for Filing: May 22 2008

**AFFIDAVIT OF DANIEL L. RODERICK IN SUPPORT OF
PROGRESS ENERGY FLORIDA'S FIFTH
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF CITRUS

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

1. My name is Daniel L. Roderick. 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 Request for

Confidential Classification. The facts attested to in my affidavit are based upon my personal
knowledge.

2. I am the Vice President of Nuclear Projects and Construction for PEF's nuclear
plant. This department manages nuclear generation growth strategies.

3. As the Vice President of Nuclear Projects and Construction, I am responsible for
all aspects of major projects and construction of nuclear generating assets in Florida, including
the administration of PEF's contracts with various nuclear plant contractors.

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4. PEF is seeking confidential classification for portions of PEF's responses to Staff's Fourth Request for Production, number 21. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's Fifth Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's Fifth Request for Confidential Classification as Exhibit C. PEF is requesting confidential classification of this information because public disclosure of the information in question would impair PEF's ability to purchase land for generation projects on competitive and favorable terms.

5. Portions of the documents responsive to this request contain information regarding land acquisition costs and the Company's site selection analysis, that would adversely impact PEF's competitive business interests if disclosed to the public. Specifically, these documents reflect the Company's confidential analysis of various sites for new power generation within Florida. The sites which were considered by the Company for the Levy Nuclear project, but not chosen, may be candidate sites for future generation opportunities for PEF. In that case, it would be compromise PEF's competitive business interests if potential real estate owners were to know how PEF analyzed site selection and estimated land acquisition costs.

6. PEF is also seeking confidential classification for portions of PEF's responses to Staff's Fifth Set of Interrogatories, numbers 87, 91, and 99. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's Fifth Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's Fifth Request for Confidential Classification as Exhibit C. PEF is requesting confidential classification of this information because public disclosure of the information in question would impair PEF's ability to contract for nuclear goods and services on competitive and favorable terms.

7. Portions of the responses to these interrogatories information regarding contractual arrangements between PEF and providers of nuclear equipment and services that would adversely impact PEF's competitive business interests if disclosed to the public. PEF must be able to assure these vendors that sensitive business information, such as the terms of their contracts, will be kept confidential. Indeed, the contract at issue contains a confidentiality provision that prohibit the disclosure of the terms of the contract to third parties. Specifically, the information at issue relates to competitively negotiated contractual data and other contractual terms, the disclosure of which would impair the efforts of the Company to negotiate these contracts on favorable terms. If other third parties were made aware of confidential contractual terms that PEF has with other parties, they may offer PEF less competitive contractual terms in future contractual negotiations. Without PEF's measures to maintain the confidentiality of sensitive terms in contracts between PEF and these nuclear contractors, the Company's efforts to obtain competitive contracts for the Levy Nuclear Project could be undermined.

8. Upon receipt of this confidential information, and with its own confidential information, strict procedures are established and followed to maintain the confidentiality 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. 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.

9. This concludes my affidavit.

Further affiant sayeth not.

Dated the 21st day of May, 2008.

A handwritten signature in black ink, appearing to read 'D. L. Roderick', written over a horizontal line.

(Signature)

Daniel L. Roderick
Vice President
Nuclear Projects and Construction
Crystal River Unit 3
Crystal River Energy Complex
Site Administration 2C
15760 West Power Line Street
Crystal River, Florida 34428

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 21st day of May, 2008 by Daniel L. Roderick. He is personally known to me or has produced his _____ driver's license, or his _____ as identification.



Katrina Cleaver-Cochran
Commission # DD497902
Expires February 2, 2010
Bonded Troy Farm Insurance, Inc. 800-385-7018

(AFFIX NOTARIAL SEAL)

Katrina Cleaver Cochran
(Signature)

KATRINA CLEAVER COCHRAN
(Printed Name)

NOTARY PUBLIC, STATE OF FLORIDA

2-2-2010
(Commission Expiration Date)

(Serial Number, If Any)

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