

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Petition for Determination of )  
Need for Levy Units 1 and 2 Nuclear )  
Power Plants. )  
\_\_\_\_\_ )

Docket No: 080148-EI

Submitted for Filing: May 28<sup>th</sup>, 2008

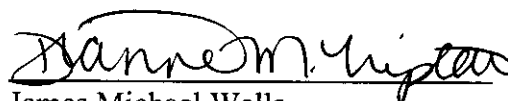
COMMISSION  
CLERK

NOTICE OF FILING AFFIDAVIT

Progress Energy Florida, Inc. hereby gives notice that it has filed the Affidavit of Daniel L. Roderick in support of Progress Energy Florida's Request for Confidential Classification Regarding White Springs Second Set of Interrogatories No. 15.

Respectfully submitted,

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- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- EUR 1 \_\_\_\_\_
- REL 1 \_\_\_\_\_
- OPC \_\_\_\_\_
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- SMR \_\_\_\_\_
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- SEC \_\_\_\_\_
- OTH \_\_\_\_\_

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated on the attached service list via electronic and U.S. Mail this 28<sup>th</sup> day of May, 2008.

  
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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Docket No. 080148-EI

Submitted for Filing: May \_\_, 2008

**AFFIDAVIT OF DANIEL L. RODERICK IN SUPPORT OF  
PROGRESS ENERGY FLORIDA'S  
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.

4. PEF is seeking confidential classification for portions of PEF's responses to White Springs' Second Set of Interrogatories, Number 15. A detailed description of the

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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 public disclosure of the information in question would violate confidentiality agreements between PEF and its nuclear vendors and would impair PEF's ability to contract for nuclear goods and services on competitive and favorable terms.

5. Portions of the response to White Springs' Interrogatory 15 contain confidential contractual information regarding the purchase of equipment and services necessary to complete the Levy Nuclear Project. Part of these responses contain 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 contracts at issue contain 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.

6. 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.

7. This concludes my affidavit.

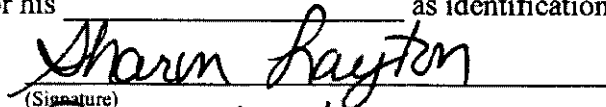
Further affiant sayeth not.

Dated the 27<sup>th</sup> day of May, 2008.



(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 27<sup>th</sup> 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.



(Signature)  
Sharon Layton  
(Printed Name)

NOTARY PUBLIC, STATE OF FL  
June 13, 2008  
(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)



(Serial Number, If Any)