

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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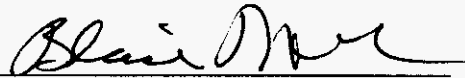
IN RE: NUCLEAR POWER PLANT COST
RECOVERY CLAUSE

Docket No. 100009-EI
Submitted for Filing: July 12, 2010

**NOTICE OF FILING AFFIDAVIT IN SUPPORT OF
PEF'S FOURTEENTH REQUEST FOR CONFIDENTIAL CLASSIFICATION
REGARDING PEF'S RESPONSES TO WHITE SPRINGS
AGRICULTURAL CHEMICAL, INC. d/b/a PCS PHOSPHATE-WHITE SPRINGS
FIRST SET OF INTERROGATORIES (NOS. 1-2)**

Notice is hereby given, through the undersigned counsel, on behalf of Progress Energy Florida, Inc. ("PEF") of filing the affidavit of Sue Hardison in support of Progress Energy Florida's Fourteenth Request for Confidential Classification Regarding PEF's Responses to White Springs Agricultural Chemical, Inc. d/b/a PCS Phosphate-White Springs First Set of Interrogatories (Nos. 1-2).

Respectfully submitted,



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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 below via electronic and U.S. Mail this 12th day of July, 2010.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost
Recovery Clause

Docket No. 100009-EI
Submitting for filing: July 12, 2010

**AFFIDAVIT OF SUE HARDISON IN SUPPORT OF PROGRESS ENERGY FLORIDA'S
FOURTEENTH REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF WAKE

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

1. My name is Sue Hardison. I am over the age of 18 years 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 "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. As General Manager - Corporate Development Group Business Services, I am responsible for financial services for the Corporate Development Group, including budgeting, capital planning and cost management. I am also responsible for project controls and contract administration for the Corporate Development Group.

3. PEF is seeking confidential classification of portions of the response produced in response to White Springs Agricultural Chemical Inc. d/b/a PCS Phosphate-White Springs ("PCS Phosphate-White Springs") First Set of Interrogatories (Nos. 1-2), specifically number 2. A detailed description of the confidential information at issue is contained in confidential

Attachment A to PEF's Request and is outlined in PEF's Justification Matrix that is attached to PEF's Request as Appendix C.

4. The Company is requesting confidential classification of this information because the information sought includes proprietary and confidential information that would impair PEF's competitive business interests if publicly disclosed, as well as information concerning contractual data, the disclosure of which would impair the Company's ability to contract on favorable terms and, in many cases, the information constitutes trade secrets of the Company and its contract partners. Specifically, a portion of the response contains details regarding PEF's estimated costs for the LNP, costs which are driven by confidential contracts with various vendors. In many instances, the disclosure of this information would violate contractual confidentiality provisions.

5. In addition, public disclosure of these documents would allow other parties to discover how the Company analyzes cost, and would thus impair PEF's ability to contract for such goods and services on competitive and favorable terms. If this information was disclosed to the public, it could adversely impact PEF's competitive interests.

6. PEF must be able to assure these vendors that sensitive business information, such as the terms of their contracts, will be kept confidential. Indeed, as discussed above, some of the contracts at issue, including the Engineering, Procurement and Construction Agreement ("EPC Agreement"), contain confidentiality provisions that prohibit the disclosure of the terms of the contract to third parties. Specifically, the information at issue relates to competitively negotiated contractual data, such as the cost and pricing of goods and services, and payment milestones 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 less competitive contractual terms in future contractual negotiations. Without the Company's measures to maintain the confidentiality of sensitive terms in contracts with these nuclear contractors, the Company's efforts to obtain competitive contracts could be undermined to the detriment of PEF and its ratepayers.

7. Upon receipt of all this confidential information, 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. At no time since negotiating and receiving the contracts and performing the analyses in question has the Company publicly disclosed the information or the terms of the contracts at issue. The Company has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

Dated this 8 day of July, 2010.

Sue Hardison

(Signature)

Sue Hardison

General Manager – Corporate Development Group
Business Services

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 8th day of ~~June~~ ^{July}, 2010 by Sue Hardison. She is personally known to me, or has produced her

N/A driver's license, or her N/A as identification.

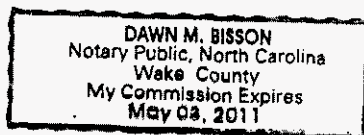
in Wake County

Dawn M. Bisson

(Signature)

Dawn M. Bisson

(Printed Name)



(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF North Carolina

May 03, 2011
(Commission Expiration Date)

NA
(Serial Number, If Any)