

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 100001-EI

COMMISSION CLERK

Dated: September 20, 2010

AFFIDAVIT OF ROBERT M. OLIVER IN SUPPORT OF PROGRESS ENERGY FLORIDA'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF NORTH CAROLINA

COUNTY OF WAKE

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

1. My name is Robert M. Oliver. 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 Manager of Portfolio Management in the Fuel and Power Optimization Department. Relative to this request, I, along with other members of this section, am responsible for forecasting system costs for both PEF and Progress Energy Carolinas ("PEC") systems, and works in conjunction with the Power Trading unit to identify power purchase opportunities to reduce the cost impact of unplanned generation outages.

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3. PEF is seeking confidential classification for certain responses to Staff's Fifth Set of Interrogatories, specifically Question 62 (Attachment A) filed on September 20, 2010. 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 sensitive business information, the disclosure of which would impair the Company's efforts to contract for goods or services on favorable terms.

4. PEF negotiates with potential power suppliers to obtain competitive contracts for power purchases that provide economic value to PEF and its ratepayers. In order to obtain such contracts, however, sensitive business information, such as energy and capacity payment information, must be kept confidential. With respect to the information at issue in this Request, PEF has kept confidential and has not publicly disclosed the confidential energy and capacity payment information. Without PEF's measures to maintain the confidentiality of sensitive terms, the Company's efforts to obtain competitive power purchase contracts could be undermined.

5. Additionally, the disclosure of PEF's confidential energy and capacity payment information to specific suppliers, could adversely impact PEF's competitive business interests. If such information was disclosed to PEF's competitors, PEF's efforts to obtain competitive power purchase options that provide economic value to both PEF and its ratepayers could be compromised by PEF's competitors changing their consumption or purchasing behavior within the relevant markets.

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

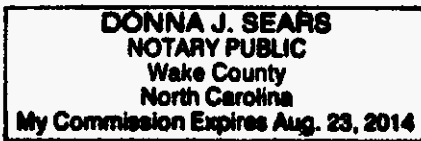
Dated the 17th day of September, 2010.

Robert M. Oliver

(Signature)

Robert M. Oliver
Manager – Portfolio Management
Fuel & Power Optimization Department
Progress Energy Carolinas
Post Office Box 1551
Raleigh, NC. 27602

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 17th day of September, 2010 by Robert M. Oliver. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.



(AFFIX NOTARIAL SEAL)

Donna J. Sears

(Signature)

DONNA J SEARS

(Printed Name)

NOTARY PUBLIC, STATE OF NC

AUGUST 23, 2014

(Commission Expiration Date)

(Serial Number, If Any)