

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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COMMISSION  
CLERK

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

Docket No. 120001-EE

Dated: May 7, 2012

**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 Fuels and Power  
Optimization Department. This department is responsible for fuel procurement, fuel  
transportation, short term energy market engagement, and unit commitment and dispatch  
planning for both PEF and Progress Energy Carolina's (PEC) systems.

3. As the Manager of Portfolio Management, I am responsible, along with  
the other members of the section, for the managing the development and application of

COM \_\_\_\_\_  
APA \_\_\_\_\_  
ECR 4  
GCL \_\_\_\_\_  
RAD \_\_\_\_\_  
SRC \_\_\_\_\_  
ADM \_\_\_\_\_  
OPC \_\_\_\_\_  
CLK \_\_\_\_\_

DOCUMENT NUMBER-DATE

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the model, analysis and data used for the short term generation planning for PEF's and PEC's electrical power generation facilities.

4. PEF is seeking confidential classification for certain responses to FIPUG's First Set of Interrogatories (Nos. 1-12), specifically Interrogatory No. 9, submitted on May 7, 2012. 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 of the vendor, Power Costs, Inc. (PCI). PCI agreed to allow us to provide this information to respond to this Interrogatory on the condition that it would be treated as confidential. Violation of this agreement would impair the Company's efforts to contract for goods or services on favorable terms in the future.

5. Upon receipt of contract information from PCI, 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. At no time since receiving the sensitive business information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

6. This concludes my affidavit.

Further affiant sayeth not.

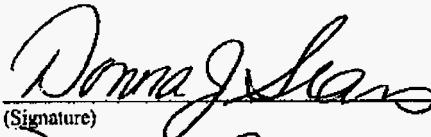
Dated the 7<sup>th</sup> day of May, 2012.



(Signature)

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

7<sup>th</sup> THE FOREGOING INSTRUMENT was sworn to and subscribed before me this day of May, 2012 by Robert M. Oliver. He is personally known to me, or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.



(Signature)

DONNA J. SEARS

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF NC

AUGUST 23, 2014

(Commission Expiration Date)

(Serial Number, If Any)

**DONNA J. SEARS**  
**NOTARY PUBLIC**  
**Wake County**  
**North Carolina**  
**My Commission Expires Aug. 23, 2014**