

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: PEF Responses to Staff's Smart Meter Data Request

Docket No. Undocketed

Dated: June 14, 2012

AFFIDAVIT OF NABIL BENWAHOUD IN SUPPORT OF PROGRESS ENERGY FLORIDA'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

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STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Nabil Benwahoud. 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 Meter Asset Performance in the Distribution Department. This section is responsible for the testing, installation, and maintenance of metering equipment for large commercial and industrial customers.

3. As the Manager of Meter Asset Performance, I am responsible, along with the other members of the section, for meter product specifications, evaluation and

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selection of metering equipment, and engineering and design of high end delivery metering points.

4. PEF is seeking confidential classification for portions its Responses to Staff's Smart Meter Data Request submitted to Staff on June 14, 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, the disclosure of which would impair the Company's efforts to contract for goods or services on favorable terms.

5. Additionally, the disclosure of confidential information of PEF's smart meter data, could adversely impact PEF's competitive business interests. If such information was disclosed to PEF's competitors, PEF's efforts to obtain competitive meter costs 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.

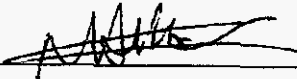
6. Upon receipt of confidential information from meter suppliers, and with its own confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist the Company, and restricting the number of, and access to the information. At no time since receiving the information in question has the Company publicly disclosed that

information. The Company has treated and continues to treat the information and contracts at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

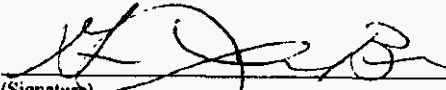
Dated the 14 day of June 14, 2012.



(Signature)

Nabil Benwahoud
Manager – Meter Asset Performance
Distribution Department
Progress Energy Florida
Post Office Box 14042
St. Petersburg, FL 33733

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 14 day of June, 2012 by Nabil Benwahoud. He is personally known to me, or has produced his FDL driver's license, or his _____ as identification.



(Signature)

Gayle Lewis-Barton

(Printed Name)
NOTARY PUBLIC, STATE OF FLORIDA

April 06, 2016

(Commission Expiration Date)

EE169192

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

