

BEFORE THE PUBLIC SERVICE COMMISSION

ORIGINAL

In Re: Petition for Determination)
of Need of Hines Unit 2 Power Plant.)
)
_____)

DOCKET NO. 001064-EL

Submitted for Filing: August 7, 2000

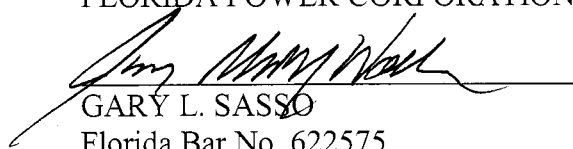
**NOTICE OF FILING AFFIDAVIT IN SUPPORT OF
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Florida Power Corporation hereby gives notice of filing the following item in support of its
Request for Confidential Classification:

1. Affidavit of Michael D. Rib in Support of Florida Power Corporation's
Request for Confidential Classification.

Respectfully submitted,

FLORIDA POWER CORPORATION



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DOCUMENT NUMBER-DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination) Docket No.: _____
of Need of Hines Unit 2 Power Plant.)
_____) Submitted for Filing: August 7, 2000

AFFIDAVIT OF MICHAEL D. RIB IN SUPPORT OF FLORIDA POWER CORPORATION'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Michael D. Rib. I am over the age of 18 years old and I have been authorized by Florida Power Corporation (hereinafter referred to as "FPC" or the "Company"), to give this affidavit in the above-styled proceeding on FPC's behalf and in support of FPC's Request for Confidential Classification.

2. I am currently employed by FPC as the Director of FPC's Resource Planning. I have held that position and precursors to that position with FPC for five (5) years. I have worked for FPC since 1981, and I have worked in FPC's Resource Planning Department (formerly called Generation Planning), since 1995.

3. The facts alleged in my affidavit are based upon my personal knowledge or upon records maintained in the ordinary course of FPC's business, as part of regularly conducted business activity, by or from information transmitted by a person with knowledge of the events described therein, at or near the time of the event described, under my personal custody and control or the custody and control of FPC's Resource Planning.

4. As the Director of FPC's Resource Planning, I was and I am responsible, along with other members of FPC's Resource Planning, for the receipt, handling, and evaluation of the proposals received in response to FPC's Request for Proposals, issued January 26, 2000 pursuant

to Rule 25-22.082, F.A.C. In the Company's RFP, I was designated as the RFP Contact on behalf of the Company. As a result, I have read the RFP and the proposals received by the Company in response to the RFP, I participated in FPC's evaluation of the proposals, and I am intimately familiar with the proposals and FPC's evaluation of them.

5. FPC requests confidential classification of the proposals FPC received in response to the Company's RFP and FPC's evaluation of them. The proposals and FPC's documentation of its evaluation of the proposals are included as appendices to the Confidential Section of the Company's Need Study. That Section of FPC's Need Study, together with the confidential pre-filed testimony of witnesses John B. Crisp and Alan S. Taylor, a consultant with PHB Hagler Bailly retained by FPC to assist it with the RFP, explain FPC's evaluation of the proposals, including extensive and detailed references to the bidders, their pricing and many other confidential aspects of their proprietary proposals. FPC requests confidential classification of these materials because the bidders who submitted proposals in response to the Company's RFP asked the Company to keep them confidential by declaring their terms to be confidential.

6. The Company provided for the confidentiality of the bids it received in response to its RFP by including a confidentiality provision in its RFP. FPC included that confidentiality provision in the RFP to assure bidders that the terms of their bids would be kept confidential and would not be publicly disclosed. Absent such assurances, potential bidders would run the risk that any sensitive engineering, construction, cost, or other business information that they provided in their bids would be made available to the public and, as a result, end up in the possession of potential competitors. Faced with that risk, potential bidders might withhold such information altogether, denying FPC the ability to fully understand and accurately assess the costs and benefits of the bidders' proposals. Or, persons or companies who otherwise would

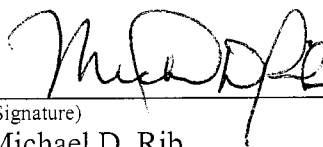
have submitted bids in response to FPC's RFP might decide not to do so, if FPC did not assure them that the terms of their bids would be kept confidential. In either case, without the assurance of confidentiality for the terms of the bids in response to FPC's RFP, FPC's efforts to obtain competitive alternative proposals to its next-planned generating unit through its RFP would be undermined.

7. For these reasons, FPC declared its intent in its RFP to keep the terms of the bidders' proposals in response to the RFP confidential. Upon receipt of the bids, strict procedures were established and followed to maintain the confidentiality of the terms of the bidders' proposals, including restricting access to those persons who needed the information to assist the Company in its evaluation of the bids and restricting the number of, and access to, copies of the proposals. At no time since receiving the bidders' proposals has the Company publicly disclosed the terms of the proposals, even to the other bidders. The Company has treated and continues to treat the bidders' proposals as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the ~~1st~~ ^{August} day of ~~July~~, 2000.



(Signature)

Michael D. Rib

(Printed Name)

Address:

Director

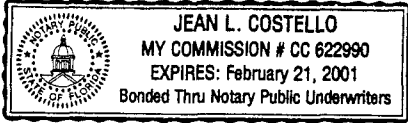
Resource Planning

Florida Power Corporation

263 - 13th Avenue, S.

St. Petersburg, FL 33701-5511

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 15th day of August, 2000 by Michael D. Rib. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.



(AFFIX NOTARIAL SEAL)

Jean L. Costello
(Signature)

Jean L. Costello
(Printed Name)

NOTARY PUBLIC, STATE OF Florida

Feb 21 2001
(Commission Expiration Date)

CC 622990
(Serial Number, If Any)