#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Progress Energy Florida, Inc.'s	)		
petition for approval of storm cost	)	Docket No.: 041272	
recovery clause for extraordinary	)		
expenditures related to Hurricanes	)		
Charley, Frances, Jeanne, and Ivan.	)	Submitted for Filing:	November 24, 2004
•	)		

# NOTICE OF FILING AFFIDAVIT IN SUPPORT OF FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION

Progress Energy Florida ("PEF" or the "Company"), hereby gives notice of filing the original Affidavit of Brantley Tillis, P.E., PEF's Transmission Project Manager and Assistant Transmission Storm Coordinator, in support of PEF's First Request for Confidential Classification, submitted for filing on November 24, 2004.

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## **Progress Energy Florida**

### Docket No. 041272-EI

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the Progress Energy Florida's Response in Opposition to the Joint Motion to Dismiss has been furnished to the following individuals by electronic mail and regular U.S. Mail the 24<sup>th</sup> day of November, 2004.

Jennifer Brubaker, Esquire Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 Vicki Gordon Kaufman, Esquire McWhirter Reeves McGlothlin Davidson Kaufman & Arnold, P.A. 117 South Gadsden Street Tallahassee, FL 32301

Patricia A. Christensen, Esquire Office of the Public Counsel c/o The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400

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# AFFIDAVIT OF BRANTLEY TILLIS, P.E., IN SUPPORT OF PROGRESS ENERGY FLORIDA'S FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

#### COUNTY OF SEMINOLE

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Brantley Tillis, P.E., who being first duly sworn, on oath deposes and says that:

- 1. My name is Brantley Tillis. 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 First Request for Confidential Classification. The facts attested to in my affidavit are based upon my personal knowledge.
- 2. I am a Transmission Project Manager in the Commitment to Excellence Section within the Energy Delivery Department at PEF. I am also assigned to the Transmission Storm Center in the event of a major storm. This department is responsible for the reliability and resource management for transmission.
- 3. As Transmission Project Manager, I am responsible for managing reliability initiatives for transmission facilities. In my role in the Transmission Storm Center, I use and I am familiar with PEF's Transmission Storm Plan.

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- 4. PEF is seeking confidential classification for portions of its Transmission Storm
- support of PEF's Petition for Approval of Storm Cost Recovery Clause for Extraordinary

  Expenditures Related to Hurricanes Charley, Frances, Jeanne, and Ivan. A detailed description

  of the confidential information in PEF's Transmission Storm Plan is contained in confidential

  Appendix A to PEF's First Request for Confidential Classification. PEF is requesting

Plan, a copy of which will be attached as an exhibit to the direct testimony of Sarah Rogers in

confidential classification of portions of its Transmission Storm Plan because they contain 1)

confidential information relating to PEF's security measures, systems and procedures and 2)

confidential employee and third-party personnel information which is unrelated to compensation,

duties, qualifications, or employment responsibilities.

- 5. Portions of PEF's Transmission Storm Plan contain information identifying the locations of PEF's critical transmission lines and substations. The plan also identifies security procedures for the restoration of nuclear plant sirens in the event of a storm. The public disclosure of such information will pose a significant security risk and has the potential to impose a hazard to public safety. It is imperative to keep such sensitive information confidential to ensure protection of the community's welfare.
- 6. Portions of PEF's Transmission Storm Plan also contain the personal home, cellular, and pager telephone numbers and email addresses for employee personnel and third-party contractors. Such information is unrelated to their compensation, duties, qualifications, or employment responsibilities and should not be disclosed to the general public
- 7. The confidential portions of PEF's Transmission Storm Plan described above are treated as private and confidential by PEF and the information has not been disclosed and is not disclosed to the public.

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8. This concludes my affidavit.

Further affiant sayeth not.

Dated the <u>22</u> day of November, 2004.

Signature)

Brantley Tillis

Transmission Project Manager Commitment to

Excellence

Progress Energy

3300 Exchange Place Lake Mary, FL 32746

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this day of November, 2004 by Brantley Tillis. He is personally known to me, or has produced his driver's license, or his \_\_\_\_\_\_ as identification.

(AFFIX NOTARIAL SEAL)

SONJA S. MCCREARY
My Comm. Exp. 3/5/05
No. CC 963564
Personally Known ( ) Other I.D.

(Signature) Sonie S. McCreary

NOTARY PUBLIC, STATE OF FLORIDA

(Commission Expiration Date)

CC9835764

(Scrial Number, If Any)