

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by
Progress Energy Florida, Inc.

Docket No. 050078-EI
Submitted for filing July 29, 2005

AFFIDAVIT OF JAVIER PORTUONDO IN SUPPORT OF
PROGRESS ENERGY FLORIDA'S
TWELFTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Javier Portuondo. I am over the age of 18 years old and I
have been authorized by Progress Energy Florida (hereinafter "PEF" or the "Company")

CMP _____ to give this affidavit in the above-styled proceeding on PEF's behalf and in support of
COM _____
CTR _____
ECR 1 _____ PEF's Twelfth Request for Confidential Classification. The facts attested to in my
GCL 1 _____ affidavit are based upon my personal knowledge.

2. I am the Director, Regulatory Services – Florida. This department is
OPC _____ responsible for the regulatory accounting and reporting activities of Progress Energy
RCA _____
SCR _____ Florida, Inc.

3. As PEF's Director of Regulatory Services, I am familiar with certain of
SGA _____
SEC 1 _____ PEF's business research, analyses, and contracts.
OTH 1 COM records _____

DOCUMENT NUMBER-

07339 JUL 2

4. In its Twelfth Request for Confidential Classification, PEF is seeking confidential classification for portions of its responses to White Springs' Second Request for Production (Nos. 17-50), Staff's Fifth Request for Production (Nos. 47-52), Staff's Sixth Set of Interrogatories (Nos. 158-175), OPC's First Request for Production (Nos. 1-75), and OPC's Third Request for Production (Nos. 108-124). The information for which PEF seeks confidential classification is more specifically described in Attachment C to PEF's Twelfth Request for Confidential Classification.

5. Portions of PEF's response to White Springs' Second request for Production No. 49 contain sensitive, competitive market research data, the disclosure of which would adversely impact PEF's competitive business interests. If PEF's suppliers or competitors were made aware of PEF's competitive market research data, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition and provision of goods and services. Specifically, such suppliers and providers may decrease supply of certain goods and services, and/or increase the cost and prices of such goods and services. Additionally, PEF's competitors may adjust their consumption behavior in the market, thereby potentially making goods and services less available and more expensive to PEF.

6. Portions of PEF's response to Staff's Fifth Request for Production No. 52 contain confidential contractual pricing arrangements and insurance terms between PEF and third parties that would adversely impact PEF's competitive business interests if disclosed to the public. If other third parties were made aware of confidential contractual terms that PEF has with other parties, they may offer PEF less competitive contractual terms in future contractual negotiations.

7. Portions of PEF's response Staff's Sixth Set of Interrogatories No. 169 contain Progress Energy's projected and estimated figures for short and long term debt, off balance sheet obligations, preferred stock, and common equity, along with other sensitive business information that PEF does not make publicly available. If PEF's suppliers or competitors were made aware of the projected and estimated figures for short and long term debt, off balance sheets, preferred stock, or common equity, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition and provision of goods, materials, or services. Specifically, if PEF's suppliers and providers were made aware of the sensitive information at issue, they may decrease supply of certain goods and services, and/or increase the cost and prices of such goods and services. Additionally, PEF's competitors may adjust their consumption behavior in the market, thereby potentially making goods and services less available and more expensive to PEF.

8. Portions of PEF's attachment to Staff's Sixth Set of Interrogatories No. 173 contain confidential contract prices and terms between PEF and its third party transportation vendors, the disclosure of which would impair PEF's ability to contract on favorable terms with transportation vendors. If other third parties were made aware of confidential contractual terms that PEF has with other parties, they may offer PEF less competitive contractual terms in future contractual negotiations.

9. Portions of PEF's supplemental responses to OPC's First Request for Production No. 71 and OPC's Third Request for Production No. 110 contain confidential studies which concern proprietary business information and were prepared by third parties. PEF has a contractual obligation with these third parties to not disclose the


proprietary business information contained in the studies and, thereby, public disclosure of the documents in question would violate such confidentiality provisions and may impair PEF's efforts to contract favorably in future negotiations. Specifically, PEF may not be able to favorably contract for the services offered by these third parties if such parties are not assured that all the information provided in connection with the studies is kept confidential.

10. Strict procedures are established and followed to maintain the confidentiality of the terms of the confidential documents and information at issue, including restricting access to those persons who need the information and documents to assist the Company. At no time has the Company publicly disclosed the confidential information or documents at issue. The Company has treated and continues to treat the information and documents at issue as confidential.

10. This concludes my affidavit.

Further affiant sayeth not.

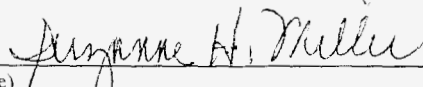
Dated this 25th day of July, 2005


(Signature)

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 25th day of July, 2005 by Javier Portuondo. He is personally known to me, or has produced his driver's license, or his _____ as identification.



(AFFIX NOTARIAL SEAL)


(Signature)

Suzanne H. MILLER
(Printed Name)

NOTARY PUBLIC, STATE OF FL

(Commission Expiration Date)