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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for approval of revised underground residential distribution tariffs, by Progress Energy Florida, Inc.

Docket No. 060017-EI

COMMISSION CLERK

Dated: March 31, 2006

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

Progress Energy Florida, Inc., ("PEF" or "Company"), by and through their undersigned counsel, hereby gives notice of filing the Affidavit of Donald G. Gower as Senior Project Analyst of Progress Energy Carolina's Energy Delivery section of the Distribution Department in support of PEF's Request for Confidential Classification, submitted for filing on March 31, 2006.

Respectfully submitted this 31<sup>st</sup> day of March, 2006.

*John T. Burnett Lms*

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PROGRESS ENERGY FLORIDA, INC.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for approval of revised  
underground residential distribution  
tariffs, by Progress Energy Florida, Inc.

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Docket No. 060017-EI

Dated: March 20, 2006

**AFFIDAVIT OF DONALD G. GOWER 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 Donald Gower, who being first duly sworn, on oath deposes and  
says that:

1. My name is Donald G. Gower. 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 senior project analyst of Progress Energy Carolina's ("PEC")  
Energy Delivery section in the Distribution Department. This section is responsible for  
the management of distribution line and tree contracts for both PEF and PEC systems.

3. As the senior project analyst of the Energy Delivery section, I am  
responsible, along with the other members of the section, for the management and

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execution of the distribution line and tree labor contracts for PEC and PEF with various suppliers.

4. PEF is seeking confidential classification for certain information provided in response to Staff's Data Request dated February 17, 2006. 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 competitive confidential business information of PEF and its contract labor suppliers that PEF has contracts with.

5. PEF negotiates with potential labor suppliers to obtain competitive hourly rate contracts. In order to obtain such contracts, however, PEF must be able to assure contract labor suppliers that sensitive business information, such as the hourly rates of their contracts, will be kept confidential. With respect to the information at issue in this Request, PEF has kept confidential and has not publicly disclosed confidential contract terms such as pricing and similar competitive information. Absent such measures, suppliers would run the risk that sensitive business information that they provided in their contracts with PEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who otherwise would contract with PEF might decide not to do so if PEF did not keep those terms of their contracts confidential. Without PEF's measures to maintain the confidentiality of sensitive terms in contracts between PEF and contract labor suppliers, the Company's efforts to obtain competitive labor contracts could be undermined.


6. Additionally, the disclosure of confidential information in PEF's contract labor suppliers could adversely impact PEF's competitive business interests. If such information was disclosed to PEF's competitors, PEF's efforts to obtain competitive contract labor that provide economic value to both PEF and its ratepayers could be compromised by PEF's competitors changing their behavior within the relevant markets.

7. Upon receipt of confidential information from contract labor 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 and contracts. At no time since receiving the contracts and information in question has the Company publicly disclosed that information or contracts. The Company has treated and continues to treat the information and contracts at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 20 day of March, 2006.



(Signature)

Donald G. Gower  
Senior Project Analyst  
Energy Delivery  
Distribution Department  
Progress Energy Carolinas  
Post Office Box 1551  
Raleigh, NC. 27602

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 20 day of March, 2006 by Donald G. Gower. He is personally known to me, or has produced his n/a driver's license, or his n/a as identification.

Jimmy D. Hooks  
(Signature)

Jimmy D. Hooks  
(Printed Name)

NOTARY PUBLIC, STATE OF North Carolina

September 2, 2007  
(Commission Expiration Date)

n/a  
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

