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March 17, 2008

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2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0863

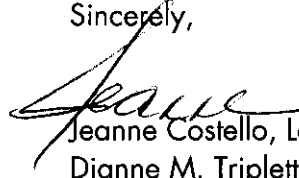
Re: Docket 080148-EI  
In re: Petition for Determination of Need for Levy Units 1 and 2 Nuclear Power Plants

Dear Ms. Cole:

Enclosed for filing is the original and one (1) copy of Progress Energy Florida, Inc.'s Notice of Filing Verified Affidavit in Support of PEF's First Request for Confidential Classification.

Thank you for your assistance in this regard.

Sincerely,



Jeanne Costello, Legal Admin. Asst. to  
Dianne M. Triplett

CMP \_\_\_\_\_

COM \_\_\_\_\_

CTR \_\_\_\_\_ Enclosures

ECR 1 \_\_\_\_\_

GCL 1 \_\_\_\_\_

OPC \_\_\_\_\_

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In Re: Petition for Determination of  
Need for Levy Units 1 and 2 Nuclear  
Power Plants.** )  
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Docket No: 080148-EI


Submitted for Filing: March 17, 2008

**NOTICE OF FILING VERIFIED AFFIDAVIT IN SUPPORT OF  
PEF'S FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Progress Energy Florida, Inc. hereby gives notice of filing the original verified affidavit of Daniel L. Roderick in support of its First Request for Confidential Classification.

Respectfully submitted,

R. Alexander Glenn  
Deputy General Counsel  
PROGRESS ENERGY SERVICE  
COMPANY, LLC  
Post Office Box 14042  
St. Petersburg, FL 33733-4042  
Telephone: (727) 820-5587  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via U.S. Mail this 17<sup>th</sup> day of March, 2008.

  
Attorney

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Facsimile: (850) 488-3309

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Determination of )  
Need for Levy Units 1 and 2 Nuclear )  
Power Plants. )

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Docket No: 080148-ET

Submitted for Filing: March <sup>17</sup>~~11~~, 2008

**AFFIDAVIT OF DANIEL L. RODERICK IN SUPPORT OF  
PROGRESS ENERGY FLORIDA'S FIRST  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF CITRUS

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

1. My name is Daniel L. Roderick. 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 Vice President of Nuclear Projects and Construction for PEF's nuclear plant. This department manages nuclear generation growth strategies.
3. As the Vice President of Nuclear Projects and Construction, I am responsible for all aspects of major projects and construction of nuclear generating assets in Florida, including the administration of PEF's contracts for land acquisition and the formation of project schedules.

4. PEF is seeking confidential classification for portions of the pre-filed testimony of Daniel L. Roderick. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's First Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's First Request for Confidential Classification as Exhibit C. PEF is requesting confidential classification of this information because public disclosure of the information in question would violate confidentiality agreements between PEF and its land sellers and would impair PEF's ability to contract for real estate on competitive and favorable terms.

5. Mr. Roderick's testimony contains the land acquisition costs for the Levy Nuclear sites. Both sites were purchased pursuant to contracts that contain confidentiality provisions. PEF negotiates with potential landowners to obtain competitive contracts for real property that provide economic value to PEF and its ratepayers. In order to obtain such contracts, however, PEF must be able to assure these landowners that sensitive business information, such as the quantity and pricing terms of their contracts, will be kept confidential. PEF has kept confidential and has not publicly disclosed the proprietary contract terms and provisions at issue here. Absent such measures, PEF would run the risk that sensitive business information regarding what it is willing to pay for real property would be made available to the public and, as a result, other potential sellers of real property could change their position in their negotiations with PEF for the future purchase of other real property. Without PEF's measures to maintain the confidentiality of sensitive terms in these real property purchase contracts, the Company's efforts to obtain competitive land contracts would be undermined. In addition, by the terms of these contracts, all parties, including PEF, have agreed to protect proprietary and confidential information, which is defined to include the price, from public disclosure.

6. PEF is also seeking confidential classification of Exhibit No. \_\_\_\_ (DLR-6) to Mr. Roderick's testimony. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's First Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's First Request for Confidential Classification as Exhibit C. PEF is requesting confidential classification of this information because public disclosure of the information in question would allow other parties to discover when the Company plans to purchase and install various pieces of equipment for the Levy Units and would thus impair PEF's ability to contract for such services on competitive and favorable terms.

7. PEF must negotiate and contract for certain pieces of equipment well in advance of the actual installation of that equipment. If potential vendors and utilities or other potential purchasers competing for the equipment orders knew when PEF must purchase such equipment, PEF's ability to negotiate for and timely obtain such equipment will likely be impaired. In order to obtain competitive contracts for the benefit of its ratepayers, PEF must be able to negotiate for long-lead items without potential vendors or competing purchasers knowing when the equipment must be ordered to meet deadlines. For example, if potential vendors or competing purchasers knew that PEF needed a particular piece of equipment by a certain date, they may change their behavior in the marketplace to the detriment of PEF's ratepayers. PEF has kept confidential and has not

8. Upon receipt of this confidential information, 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 negotiating and receiving the contracts and

preparing the schedule information in question has the Company publicly disclosed that information or contracts. The Company has treated and continues to treat the schedule information and contracts at issue as confidential.

9. This concludes my affidavit.

Further affiant sayeth not.

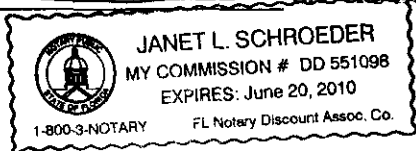
Dated the 11<sup>th</sup> day of March, 2008.



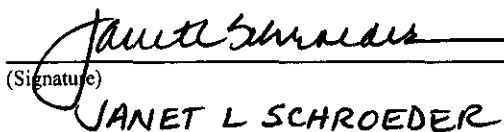
(Signature)

Daniel L. Roderick  
Vice President  
Nuclear Projects and Construction  
Crystal River Unit 3  
Crystal River Energy Complex  
Site Administration 2C  
15760 West Power Line Street  
Crystal River, Florida 34428

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 11<sup>th</sup> day of March, 2008 by Daniel L. Roderick. He is personally known to me, ~~or has produced his driver's license, or his~~ as identification.



(AFFIX NOTARIAL SEAL)



(Signature)

(Printed Name)

JANET L SCHROEDER  
NOTARY PUBLIC, STATE OF FLORIDA

06/20/2010

(Commission Expiration Date)

(Serial Number, If Any)