

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost
Recovery Clause

Docket No. 080009-EI

Submitted for Filing: May 22, 2008

**AFFIDAVIT OF DANIEL L. RODERICK IN SUPPORT OF
PROGRESS ENERGY FLORIDA'S SECOND
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

CMP _____ affidavit in the above-styled proceeding on PEF's behalf and in support of PEF's Request for

COM _____ Confidential Classification. The facts attested to in my affidavit are based upon my personal

CTR _____ knowledge.

SCF I 2. I am the Vice President of Nuclear Projects and Construction for PEF's nuclear
SCC I plant. This department manages nuclear generation growth strategies.

UFC _____ 3. As the Vice President of Nuclear Projects and Construction, I am responsible for
HCA _____ all aspects of major projects and construction of nuclear generating assets in Florida, including
SCR _____

SGA _____

SEC _____

OTR _____

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the administration of PEF's contracts for the Crystal River 3 ("CR3") Uprate project and ongoing project analysis.

4. PEF is seeking confidential classification for portions of Exhibit Numbers LC-1 and LC-2, attached to the May 1, 2008 pre-filed testimony of Lori Cross. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's Second Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's Second 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 nuclear vendors and would impair PEF's ability to contract for nuclear goods and services on competitive and favorable terms.

5. Portions of these exhibits contain contractual terms and details regarding ongoing contracts PEF has with various nuclear vendors. PEF must be able to assure these vendors that sensitive business information, such as the terms of their contracts, will be kept confidential. Indeed, some of the contracts at issue contain confidentiality provisions that prohibit the disclosure of the terms of the contract to third parties. Specifically, the information at issue relates to competitively negotiated contractual data, such as quantity and pricing of goods and services, and other contractual terms, the disclosure of which would impair the efforts of the Company to negotiate these contracts on favorable terms. 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. Without PEF's measures to maintain the confidentiality of sensitive terms in contracts between PEF and these nuclear

contractors, the Company's efforts to obtain competitive contracts for the CR3 Uprate project could be undermined.

6. PEF is also seeking confidential classification of portions of Exhibit Number DLR-1, attached to my May 1, 2008 pre-filed testimony. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's Second Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's Second 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 how the Company analyzes whether to proceed with the CR3 Uprate project, including detailed analysis of risk options, scheduling, and cost, and would thus impair PEF's ability to contract for such goods and services on competitive and favorable terms.

7. Portions of these documents are confidential and sensitive analyses and project plans done by the Company in considering whether to proceed with the CR3 Uprate project, including detailed analysis of risk options, scheduling, and cost. These documents reflect the Company's internal strategies for evaluating projects and meeting deadlines. If this information was disclosed to the public, it could adversely impact PEF's competitive interests. If such information was disclosed to PEF's competitors and/or other potential suppliers, PEF's efforts to obtain competitive nuclear equipment and service options that provide economic value to both PEF and its ratepayers could be compromised by PEF's competitors and/or suppliers changing their offers, consumption, or purchasing behavior within the relevant markets. For example, if one of PEF's suppliers was to know that PEF considered a particular good or service to be of

utmost importance to the project, that supplier could artificially increase the asking price for that good or service, to the detriment of the ratepayers.

8. Upon receipt of all 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 doing the project analyses in question has the Company publicly disclosed that information or contracts. The Company has treated and continues to treat the information at issue as confidential.

9. This concludes my affidavit.

Further affiant sayeth not.

Dated the 21st day of May, 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 21st day of May, 2008 by Daniel L. Roderick. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

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Katrina Cleaver-Cochran
Commission # DD497902
Expires February 2, 2010
Bonded Troy Fair Insurance, Inc. 800-365-7019

(AFFIX NOTARIAL SEAL)

Katrina Cleaver Cochran
(Signature)
KATRINA CLEAVER COCHRAN
(Printed Name)
NOTARY PUBLIC, STATE OF FLORIDA
2-2-2010
(Commission Expiration Date)

(Serial Number, If Any)

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