

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost
recovery clause with generating
performance incentive factor

Docket No. 080001-EI

Dated: June 30, 2008

**AFFIDAVIT OF LORI CROSS IN SUPPORT OF
PROGRESS ENERGY FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

COMMISSION
CLERK

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STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Lori Cross. 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 Manager of Regulatory Planning for Progress Energy Florida.

3. As the Manager of Regulatory Planning, I am responsible, along with the
other members of the section, for the regulatory strategy, compliance and planning
functions of the Florida electric utility.

4. PEF is seeking confidential classification for portions of its responses to
Staff's Midcourse Data Request, specifically Question 1, Attachment titled "E-10

CMP _____
COM _____
CTR _____
ECP J _____
GC L _____
GFC _____
RCA _____
SOR _____
BGA _____
SEC _____
OTH _____

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

Schedules for 2008 & 2009". 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 document because public disclosure of the information in question would violate confidentiality agreements between PEF and its nuclear vendors, the disclosure of which would impair the Company's ability to contract for nuclear goods and services on competitive and favorable terms.

5. PEF negotiates with potential nuclear vendors to obtain competitive contracts for nuclear goods that provide economic value to PEF and its ratepayers. In order to obtain such goods, however, PEF must be able to assure nuclear vendors that sensitive business information, such as pricing figures, 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 figures. Absent such measures, nuclear vendors would run the risk that sensitive business information that they provided to PEF would be made available to the public and, as a result, adversely affect the business relationship between PEF and the nuclear vendor. 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 nuclear vendors, the Company's efforts to contract for competitive nuclear goods and services could be undermined.

6. Additionally, the disclosure of confidential information in PEF's nuclear goods contracts, proposals, and other such documents could adversely impact PEF's competitive business interests. If such information was disclosed to PEF's competitors, PEF's efforts to obtain competitive nuclear supply options 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 nuclear vendors, 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 information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 27th day of June, 2008.

Lori Cross

(Signature)

Lori Cross
Manager
Regulatory Planning
Progress Energy Florida
299 First Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 27th day of June, 2008 by Lori Cross. She is personally known to me, or has produced her _____ driver's license, or her _____ as identification.

Suzanne H. Miller

(Signature)

SUZANNE H. MILLER

(Printed Name)

NOTARY PUBLIC, STATE OF Florida

3/27/09

(Commission Expiration Date)

DD 411455

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

