

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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COMMISSION  
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In re: Nuclear Power Plant Cost  
Recovery Clause

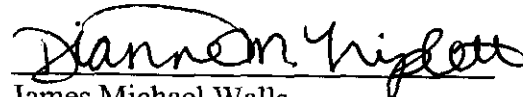
Docket No. 080009-EI

Submitted for Filing: July 10, 2008

**PROGRESS ENERGY FLORIDA, INC'S  
NOTICE OF FILING AFFIDAVIT IN SUPPORT OF FOURTH  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Progress Energy Florida, Inc. hereby gives notice of filing the affidavit of Daniel L. Roderick (unverified) in support of its Fourth Request for Confidential Classification.

Respectfully submitted,



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BY: \_\_\_\_\_  
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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 electronic service and U.S. Mail this 10<sup>th</sup> day of July, 2008.

  
Attorney

<p>Mr. Paul Lewis, Jr. Progress Energy Florida, Inc. 106 East College Avenue, Ste. 800 Tallahassee, FL 32301-7740 Phone: (850) 222-8738 Facsimile: (850) 222-9768 Email: <a href="mailto:paul.lewisjr@pgnmail.com">paul.lewisjr@pgnmail.com</a></p>	<p>Lisa Bennett Jennifer Brubaker Staff Attorney Florida Public Service Commission 2540 Shumard Oak Blvd Tallahassee 32399 Phone: (850) 413-6218 Facsimile: (850) 413-6184 Email: <a href="mailto:lbennett@psc.state.fl.us">lbennett@psc.state.fl.us</a> <a href="mailto:jbrubake@psc.state.fl.us">jbrubake@psc.state.fl.us</a></p>
<p>Stephen C. Burgess Associate Counsel Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400 Phone: (850) 488-9330 Email: <a href="mailto:burgess.steve@leg.state.fl.us">burgess.steve@leg.state.fl.us</a></p>	<p>R. Wade Litchfield John Butler Florida Power &amp; Light 700 Universe Boulevard Juno Beach, FL 33408-0420 Phone: (561) 691-7101 Facsimile: (561) 691-7135 Email: <a href="mailto:wade_litchfield@fpl.com">wade_litchfield@fpl.com</a> <a href="mailto:John_butler@fpl.com">John_butler@fpl.com</a></p>
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<p>Michael B. Twomey AARP Post Office Box 5256 Tallahassee, FL 32305 Phone: (850) 421-9530 Email: <a href="mailto:Miketwomey@talstar.com">Miketwomey@talstar.com</a></p>	<p>Karin S. Torain PCS Administration (USA), Inc. Suite 400 Skokie Blvd. Northbrook, IL 60062 Phone: (847) 849-4291 Email: <a href="mailto:KSTorain@potashcorp.com">KSTorain@potashcorp.com</a></p>

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Nuclear Power Plant Cost  
Recovery Clause

Docket No. 080009-EI

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Submitted for Filing: July \_\_\_\_, 2008

**AFFIDAVIT OF DANIEL L. RODERICK IN SUPPORT OF  
PROGRESS ENERGY FLORIDA'S FOURTH  
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 the Crystal River 3 ("CR3") Uprate project and ongoing project analysis.

4. PEF is seeking confidential classification for portions of Progress Energy Florida's Supplemental Responses to OPC's Second Request for Production of Documents (Nos. 12-57), specifically OPC Request No. 54. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's Fourth Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's Fourth Request for Confidential Classification as Appendix C. PEF is requesting confidential classification of this portion of the response, because it calls for confidential information considered proprietary to third parties with whom PEF contracts.

5. Portion of the documents responsive to OPC Request No. 54 contain proprietary and confidential information received from PEF's third party vendors regarding the CR3 Uprate project. PEF is requesting confidential classification of its responses because public disclosure of the documents and information in question would impair PEF's competitive business interests. Specifically, if PEF's suppliers or contract vendors were made aware that PEF did not protect the proprietary, technical information of the parties with whom PEF contracts, they may adjust their behavior in the market place with respect to activity such as pricing and the acquisition and provision of goods, materials, and services. In addition, such third party contractors may choose not to provide such services to PEF at all.

6. PEF also has a contractual obligation to maintain the confidentiality of any material or information that the third party supplier of such information deems proprietary. The third party which provided this information to PEF considers this information to be proprietary; thus, pursuant to its contract with that third party, PEF must not publicly disclose this information.

6. 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.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the \_\_\_\_ day of July, 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 \_\_\_\_ day of July, 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)  
NOTARY PUBLIC, STATE OF \_\_\_\_\_  
  
\_\_\_\_\_  
(Commission Expiration Date)  
  
\_\_\_\_\_  
(Serial Number, If Any)