

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Nuclear Power Plant Cost
Recovery Clause

Docket No. 080009-EI


Submitted for Filing: July 28, 2008

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

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

Respectfully submitted,

R. Alexander Glenn
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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 28th day of August, 2008.


Attorney

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<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: burgess.steve@leg.state.fl.us</p>	<p>R. Wade Litchfield John Butler Florida Power & Light 700 Universe Boulevard Juno Beach, FL 33408-0420 Phone: (561) 691-7101 Facsimile: (561) 691-7135 Email: wade_litchfield@fpl.com John_butler@fpl.com</p>
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost
Recovery Clause

Docket No. 080009-EI

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**AFFIDAVIT OF DANIEL L. RODERICK IN SUPPORT OF
PROGRESS ENERGY FLORIDA'S SIXTH
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 for the CR3 Uprate and Levy nuclear projects.

4. PEF is seeking confidential classification for portions of Progress Energy Florida's Responses to Staff's Second Request for Production of Documents (No. 8). A detailed

DOCUMENT NUMBER-DATE

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description of the confidential information at issue is contained in confidential Appendix A to PEF's Sixth Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's Sixth Request for Confidential Classification as Appendix C. PEF is requesting confidential classification of portions of the response, because it calls for documents that contain sensitive business information regarding the Company's planned construction schedule for the CR3 Uprate and Levy nuclear projects, the disclosure of which would compromise PEF's competitive business interests.

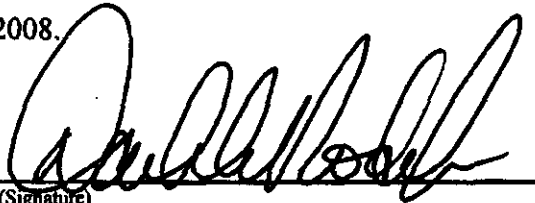
5. Portions of the documents responsive to Staff's Request No. 8 contain sensitive business information regarding the Company's planned construction schedule for the CR3 Uprate and Levy nuclear projects. PEF is requesting confidential classification of this scheduling information because public disclosure of the information in question would allow other parties to discover when the Company plans to purchase and install various pieces of equipment for these projects and would thus impair PEF's ability to contract for such services on competitive and favorable terms. 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 publicly disclosed the proprietary schedule terms and provisions at issue here.

6. 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 developing 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.

7. This concludes my affidavit.

Further affiant sayeth not.

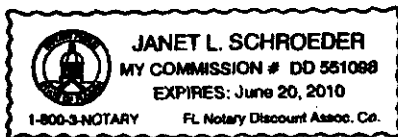
Dated the 24th day of July, 2008.



(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 24th 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)
JANET L. SCHROEDER
(Printed Name)

NOTARY PUBLIC, STATE OF FLORIDA

06-20-2010
(Commission Expiration Date)

DD 551098
(Serial Number, If Any)