## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Dated: August 29, 2008

## AFFIDAVIT OF JOSEPH McCALLISTER IN SUPPORT OF PROGRESS ENERGY FLORIDA'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF NORTH CAROLINA

## **COUNTY OF WAKE**

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

- 1. My name is Joseph McCallister. 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 Director of Gas and Oil Trading in the Regulated Fuels

СОМ	Department.	This section is responsible for natural gas	and fuel oil acquisition for both
ECR ]	PFF and Proc	gress Energy Carolinas ("PEC") systems.	
GCL 🗍		gress Energy Curoninus (The ) systems.	
OPC 🗌	3.	As the Director of Gas and Oil Trading,	I am responsible, along with the
RCP _			
SSC	other members of the section, for the management of the gas and oil procurement,		
SGA _			
ADM	<del></del>		
CLK _			DOCUMENT NUMBER-DATE

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transportation, hedging activities and administration of gas and oil contracts with various suppliers for PEF's and PEC's electrical power generation facilities.

- 4. PEF is seeking confidential classification for certain pages of the testimony, certain information in the Risk Management Plan (Exhibit JM-1P), and Exhibit JM-2P to the testimony of Joseph McCallister dated August 29, 2008. 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 information because it contains sensitive business information, the disclosure of which would impair the Company's efforts to contract for goods or services on favorable terms.
- 5. PEF negotiates with potential fuel suppliers to obtain competitive contracts for fuel options that provide economic value to PEF and its ratepayers. In order to obtain such contracts, however, sensitive business information, such as forecasted volumes, hedging percentages, timeframes, internal policies and guidelines, collateral summaries and unrealized forecasted hedge values, must be kept confidential. With respect to the information at issue in this Request, PEF has kept confidential and has not publicly disclosed confidential information such as forecasted costs, hedging volumes, hedging percentages, timeframes, internal policies and guidelines, collateral summaries and unrealized forecasted hedge values. Without PEF's measures to maintain the confidentiality of sensitive terms, the Company's efforts to obtain competitive fuel supply contracts could be undermined, because potential fuel suppliers could simply offer

the highest prices that would allow them to maintain a marginally competitive position against the disclosed volumes and percentages.

- 6. Additionally, the disclosure of confidential information in PEF's forecasted fuel volumes and hedging percentages, could adversely impact PEF's competitive business interests. If such information was disclosed to PEF's competitors, PEF's efforts to obtain competitive fuel supply options that provide economic value to both PEF and its ratepayers could be compromised by PEF's competitors changing their consumption or purchasing behavior within the relevant markets.
- 7. Upon receipt of 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 and contracts at issue as confidential.
  - 8. This concludes my affidavit.

Further affiant sayeth not.

Dated the <u>Alo</u> day of Augu	Ist, 2008.  (Signature)  Joseph McCallister  Director - Gas and Oil Trading  Regulated Fuels Department  Progress Energy Carolinas  Post Office Box 1551  Raleigh, NC. 27602			
THE FOREGOING INSTRUMENT was sworn to and subscribed before me this day of August, 2008 by Joseph McCallister. He is personally known to me, or has produced his driver's license, or his as identification.				
(AFFIX NOTARIAL SEAL)	(Signature)  Weydy M. Dunn (Printed Name)  NOTARY PUBLIC, STATE OF NC  Comprission Expiration Date)			
	(Serial Number, If Any)			