

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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COMMISSION
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In re: Nuclear Power Plant
Cost Recovery

Docket No: 080009-EI

Submitted for Filing: September 11, 2008

**AFFIDAVIT OF DANIEL L. RODERICK IN SUPPORT OF PROGRESS ENERGY
FLORIDA'S REQUEST FOR CONFIDENTIAL CLASSIFICATION
REGARDING REBUTTAL TESTIMONY OF WILL GARRETT**

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

COM all aspects of major projects and construction of nuclear generating assets in Florida, including
ECR 1
GCL the administration of PEF's contracts for the Crystal River 3 ("CR3") Uprate project and ongoing
OPC _____
RCP project analysis for the CR3 Uprate and Levy nuclear projects.
SSC _____
SGA _____

4. PEF is seeking confidential classification for portions of the Rebuttal Testimony

ADM of Will Garrett regarding confidential and sensitive cost projections regarding the Company's
CLK _____

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nuclear projects. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's First 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 public disclosure of the information in question would impair PEF's competitive business interests.

5. The testimony at issue contains information based on confidential and sensitive cost projections and analyses regarding the Company's nuclear projects, regarding land acquisition costs that would adversely impact PEF's competitive business interests if disclosed to the public. PEF is requesting confidential classification of this information because public disclosure of the information in question would impair PEF's ability to contract for real estate on competitive and favorable terms. PEF negotiates with potential landowners to obtain competitive contracts for real property that provide economic value to PEF and its ratepayers. In order to obtain such contracts, however, PEF must ensure that these landowners are not aware of how much the Company estimates the land would cost in a condemnation proceeding. Absent such measures, PEF would run the risk that sensitive business information regarding what it is willing to pay for real property would be made available to the public and, as a result, other potential sellers of real property could change their position in their negotiations with PEF for the future purchase of other real property. In addition, should PEF need to obtain any land through condemnation proceedings, it would impair PEF's ability to obtain favorable pricing terms if landowners were to know what PEF internally expected to pay for the property through condemnation proceedings.

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.

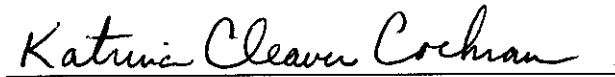
Further affiant sayeth not.

Dated the 10 day of September, 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 10th day of September, 2008 by Daniel L. Roderick. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.



(Signature)

KATRINA CLEAVER COCHRAN
(Printed Name)

NOTARY PUBLIC, STATE OF FLORIDA

(AFFIX NOTARIAL SEAL)



Katrina Cleaver-Cochran
Commission # DD497902
Expires February 2, 2010
Bonded Troy Fam Insurance, Inc. 800-385-7019

(Commission Expiration Date)

(Serial Number, If Any)