

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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IN RE:  
PETITION FOR INCREASE IN RATES  
BY PROGRESS ENERGY FLORIDA, INC.

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Docket No. 090079-EI  
Submitted for filing: August 25, 2009

**NOTICE OF FILING UNVERIFIED AFFIDAVIT OF THOMAS SULLIVAN IN SUPPORT  
OF PEF'S EIGHTH REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Notice is hereby given, through the undersigned counsel, on behalf of Progress Energy Florida, Inc. of filing the Unverified Affidavit of THOMAS SULLIVAN in support of Progress Energy Florida's Eighth Request for Confidential Classification.

Respectfully submitted,

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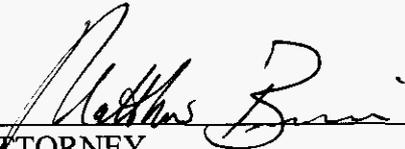
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via electronic and U.S. Mail to the following counsel of record as indicated below on this 25<sup>th</sup> day of August, 2009.

  
\_\_\_\_\_  
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for rate increase by  
Progress Energy Florida, Inc.

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Docket No. 090079-EI  
Filed: August 25, 2009

**AFFIDAVIT OF THOMAS SULLIVAN IN SUPPORT OF PROGRESS ENERGY  
FLORIDA'S EIGHTH REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

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

1. My name is Thomas Sullivan. 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 Eighth Request for Confidential Classification ("the Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Treasurer at PEF. I am also Vice President and Treasurer of Progress Energy Service Company. As Treasurer, I am responsible for Financial Operations, Corporate Insurance, Financial Analysis, Investment Management, and Enterprise Risk Management. As Treasurer, I help prepare, use, and am familiar with Progress Energy's figures for short term and long term debt, off balance sheet obligations, preferred stock and common equity.

3. In its Eighth Request for Confidential Classification, PEF is seeking confidential classification for certain information contained in its responses to Staff's Thirteenth Request for Production of Documents (Nos. 67-96), specifically documents produced in response to request numbers 70, 71 and 90. An unredacted version of the information at issue is contained in

confidential Appendix A to PEF's Request and the confidential portions thereof are outlined in PEF's Justification Matrix attached to the Request as Appendix C. PEF is requesting confidential classification of portions of these documents because they contain proprietary confidential business information and contractual data, the disclosure of which would compromise PEF's competitive business interests.

4. Certain portions of the documents being produced in response to Staff's requests contain confidential competitive business information regarding the Company's financial projections, planning, and strategies. Disclosure of this proprietary and confidential information could adversely affect the Company's ability to secure goods and services at favorable terms in the future by affecting the behavior of third parties in the market for needed goods and services. This information includes, for example, the Company's monthly "Treasury Reports" (summary documents with high-level information including Financing plans, Debt-Forecasts, Cash-Flow updates, and Market Impact statements) covering both PEF and its parent, Progress Energy, Inc. ("PGN"), as well as credit metric summaries for PEF and PGN, meeting agendas and minutes for various committees (including, e.g., the Treasury, Risk and Transactions subcommittee and the Finance Committee). PGN and the Company consider this information confidential and proprietary, and at all times guard against its public disclosure. PEF has also produced information regarding its five-year revolving credit agreement. PEF is required to maintain this contractual information as confidential pursuant to the terms of the contracts with its third party lenders.

5. With respect to the confidential information at issue, strict procedures are established and followed to maintain the confidentiality of that information; such procedures include, but are not limited to, restricting access to the information to only those persons who require it to assist the Company. PEF has treated and continues to treat the information contained in these documents as confidential

6. This concludes my affidavit.

Dated this \_\_\_\_\_ day of August, 2009.

\_\_\_\_\_  
(Signature)

Thomas Sullivan

Treasurer, Progress Energy Florida, Inc.

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this \_\_\_ day of August, 2009 by Thomas Sullivan. He is personally known to me, or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed Name)

NOTARY PUBLIC, STATE OF \_\_\_\_\_

\_\_\_\_\_  
(Commission Expiration Date)

\_\_\_\_\_  
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)