

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

---

In re: Petition for approval of amended  
negotiated purchase power contract with  
BG&E of Florida, LLC by Progress  
Energy Florida, Inc.

---

Docket No. 090537-EQ

Dated: March 22, 2010

RECEIVED-FPSC  
10 MAR 22 PM 12:45  
COMMISSION  
CLERK

**AFFIDAVIT OF DAVID W. GAMMON IN SUPPORT OF  
PROGRESS ENERGY FLORIDA'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is David W. Gammon. 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 a Senior Power Delivery Specialist in PEF's Renewables and  
Wholesale Power section of Progress Energy's Efficiency and Innovative Technology  
Department. This section is responsible for PEF's long-term wholesale purchases and  
sales, including purchases from Qualifying Facilities.

DOCUMENT NUMBER-DATE

02001 MAR 22 0

FPSC-COMMISSION CLERK

3. As a Senior Power Delivery Specialist, I am responsible, along with the other members of the section, for the administration of PEF's Qualifying Facility contracts with various suppliers.

4. PEF is seeking confidential classification for certain information contained in its responses to Staff's Data Request No. 2 submitted to the Florida Public Service Commission ("FPSC") on March 22, 2010. 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 competitive confidential business information of both PEF and BG&E of Florida.

5. PEF negotiates with potential purchase power companies to obtain competitive contracts for capacity and energy that provides economic value to PEF and its ratepayers. In order to obtain such contracts, however, PEF must be able to assure counterparties that sensitive business information, such as the EIA adjusted pricing, fuel forecast pricing, escalator percentages and PIRA forecast pricing, will be kept confidential. With respect to the information at issue in this Request, PEF has kept confidential and has not publicly disclosed confidential contract terms such as the EIA adjusted pricing, fuel forecast pricing, escalator percentages and PIRA forecast pricing. Absent such measures, potential contracting counterparties would run the risk that sensitive business information that they provided in their contracts with PEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who otherwise would contract

---

with PEF might decide not to do so if PEF did not keep those terms of their contracts confidential. Without PEF's measures to maintain the confidentiality of sensitive terms in contracts between PEF and contractors, the Company's efforts to obtain competitive contracts could be undermined.

6. Additionally, the disclosure of the confidential information could adversely impact PEF's competitive business interests. If such information was disclosed to PEF's competitors and to other potential suppliers, PEF's efforts to obtain competitive purchased power options that provide economic value to both PEF and its ratepayers could be compromised by PEF's competitors and other suppliers changing their behavior within the relevant markets.

7. Upon receipt of confidential information from contracting counterparties, 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 receiving the contract and information in question has the Company publicly disclosed that information or contract. The Company has treated and continues to treat the information and contract at issue as confidential.

8. This concludes my affidavit.

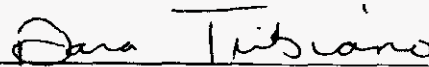
Further affiant sayeth not.

Dated the 18<sup>th</sup> day of March, 2010.



(Signature)  
David W. Gammon  
Senior Power Delivery Specialist  
Renewable & Wholesale Power  
Efficiency & Innovative Technology Dept.  
Progress Energy Florida  
299 First Avenue North  
St. Petersburg, FL 33701

18<sup>th</sup> THE FOREGOING INSTRUMENT was sworn to and subscribed before me this day of March, 2010 by David W. Gammon. He is personally known to me, or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.



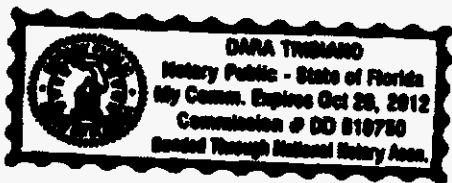
(Signature)

Dara Tribiano

(Printed Name)

NOTARY PUBLIC, STATE OF Florida

(AFFIX NOTARIAL SEAL)



(Commission Expiration Date)

(Serial Number, If Any)

DOCUMENT NUMBER-DATE  
02001 MAR 22 2010  
-REC-COMMISSION CLERK