

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: NUCLEAR POWER PLANT COST  
RECOVERY CLAUSE

Docket No. 100009-EI  
Submitted for Filing: May 17, 2010

**NOTICE OF FILING AFFIDAVIT IN SUPPORT OF  
PEF'S REQUEST FOR CONFIDENTIAL CLASSIFICATION REGARDING AUDIT  
CONTROL 10-006-2-1 DATA REQUESTS AND WORKPAPERS**

Notice is hereby given, through the undersigned counsel, on behalf of Progress Energy Florida, Inc. ("PEF") of filing the affidavit of Cynthia Lee in support of Progress Energy Florida's Request for Confidential Classification Regarding Audit Control No. 10-006-2-1, Data Requests and Workpapers.

Respectfully submitted,



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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 and U.S. Mail this 17<sup>th</sup> day of May, 2010.



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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Nuclear Cost Recovery Clause

Docket No: 100009-EI  
Submitted for Filing: May 17, 2010

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**AFFIDAVIT OF CYNTHIA LEE IN SUPPORT OF PROGRESS ENERGY FLORIDA'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION REGARDING  
AUDIT CONTROL 10-006-2-1 DATA REQUESTS AND WORKPAPERS**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Cynthia Lee. 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 hold the position of Manager, Regulatory Accounting. As such, I am responsible for all regulatory accounting and reporting requirements for PEF at the state and federal levels and direct responses to regulatory inquiries and audits. I am also responsible for accounting for all regulatory cost recovery clauses and managing Property Accounting for PEF to ensure that the company's property records are maintained in compliance with GAAP, regulatory requirements, and internal policies.

3. PEF is seeking confidential classification of portions of the documents and information provided to Public Service Commission (“PSC”) Staff auditors, in response to data requests, during Staff’s review, *Audit Control No. 10-006-2-1* and portions of Staff’s workpapers. The documents containing the confidential information at issue are contained in confidential Attachment 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 Attachment C. PEF is requesting confidential classification of these documents because they include confidential and proprietary contractual information and other financial information related to the Company’s competitive business interests, the disclosure of which would compromise PEF’s competitive business interests.

4. Specifically, these documents contain confidential contractual data, including pricing agreements and other confidential contractual terms. Disclosure of the terms of these agreements would impair PEF’s competitive business interests, and would further be a violation of the contractual confidential agreements. Disclosure of this information would impair PEF’s competitive business interests by providing third parties with information regarding contractual terms with which PEF is willing to agree, thereby giving third parties a competitive advantage when negotiating similar contracts with PEF. For example, if third party contractors were to know the amount that PEF is willing to pay for certain work, they may raise their bids to such an amount, irrespective of the fact that they may be able to perform the work for a lesser amount, thus making it more expensive for PEF to contract for necessary goods and services.

5. Upon receipt of this confidential information, and with its own confidential information, strict procedures are established and followed to maintain the confidentiality of the documents and information provided, including restricting access only to those persons who

need the information to assist the Company. 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 at issue as confidential.

6. This concludes my affidavit.

Further affiant sayeth not.

Dated the 14<sup>th</sup> day of May, 2010.

*Cynthia Lee*

(Signature)

Cynthia Lee  
Manager, Regulatory Accounting  
Progress Energy Florida, Inc.  
299 1<sup>st</sup> Avenue North  
PEF - 132  
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 14<sup>th</sup> day of May, 2010 by Cynthia Lee. She is personally known to me, or has produced her \_\_\_\_\_ driver's license, or her \_\_\_\_\_ as identification.

*Suzanne H. Miller*

(Signature)

Suzanne H. Miller

(Printed Name)

NOTARY PUBLIC, STATE OF FL

3/27/13

(Commission Expiration Date)

# DD 842069

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

