

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Energy conservation cost recovery  
clause.

Docket No. 100002-EG

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Submitted for Filing: May 18, 2010

**AFFIDAVIT OF REBECCA S. HARRISON 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 Rebecca S. Harrison, who being first duly sworn, on oath deposes  
and says that:

1. My name is Rebecca S. Harrison. 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 First Request for Confidential Classification. The facts attested to in my affidavit  
are based upon my personal knowledge.

2. I am the General Manager of the Smart Grid Program Office in the  
Efficiency and Innovative Technology Department. This section is responsible for the  
development of Progress Energy's Smart Grid application submitted to the Department of  
Energy in August 2009.

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3. As the General Manager of the Smart Grid Program, I am responsible for the information submitted in Progress Energy's application and the confidentiality of information associated with the application.

4. In this Request for Confidential Classification, PEF is seeking confidential classification for portions of its responses to OPC'S First Request for Production of Documents (Nos. 1-3) in Docket 100002-EG. The detailed description of the confidential information at issue is outlined in PEF's Justification Matrix that is attached to PEF's Request for Confidential Classification as Appendix C.

5. Portions of PEF's attachments to its response to OPC's First Request for Production (Nos. 1-3), specifically question 3, contain proprietary confidential business information of Progress Energy employees and vendors. More specifically, portions of the documents contain sensitive employee personnel information such as resumes and qualifications of PEF, Progress Energy Carolina and Progress Energy Service Company employees to be engaged in support of the Smart Grid projects. The documents also contain key supplier resumes that are supporting Smart Grid projects. These grant project participants have requested that their resumes remain confidential.

6. With respect to the information at issue in this request, the Company has kept confidential and has not publicly disclosed information related to the qualifications of the Smart Grid team members. Absent such measures, competitors or employment recruiters could be made aware of team member resumes and qualifications, and they may attempt to contact team members to gain necessary resources and offer them attractive employment opportunities, ultimately having a detrimental impact on Progress Energy's Smart Grid projects.

7. Strict procedures are established and followed to maintain the confidentiality of the Smart Grid team member resumes, including restricting access to those persons who need the information to assist the Company, and restricting the number of, and access to the information. At no time since receiving the information in question has the Company publicly disclosed this information. The Company has treated and continues to treat the information at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

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

Rebecca S. Harrison

(Signature)

Rebecca S. Harrison  
General Manager of Smart Grid Program Office  
Efficiency and Innovative Technology Department  
Progress Energy Carolinas  
100 E. Davie St.  
Raleigh, NC 27602

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 18<sup>th</sup> day of May, 2010 by Rebecca S. Harrison. She is personally known to me, or has produced her \_\_\_\_\_ driver's license, or her \_\_\_\_\_ as identification.

Phyllis M. Tolley

(Signature)

Phyllis M. Tolley

(Printed Name)

NOTARY PUBLIC, STATE OF NC

3/8/2015

(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)

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