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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: FPSC Review of the Payment Arrangement Programs offered by the Florida Electric Industry.

Docket No. Undocketed

Dated: September 26, 2012

claim of confidentiality
notice of intent
 request for confidentiality
filed by OPC

PROGRESS ENERGY FLORIDA INC.'S

For DN 06466-12, which is in locked storage. You must be authorized to view this DN.-CLK
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Progress Energy Florida, Inc., ("PEF" or "Company"), pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), submits this Request for Confidential Classification for information contained in the FPSC's Review of the Payment Arrangement Programs offered by the Florida Electric Industry ("the Report"), specifically Page 27 of the Report. In support of this Request, PEF states:

1. In Staff's Review, there is sensitive PEF information that is "proprietary business information" under Section 366.093(3), Florida Statutes.
2. The following exhibits are included with this request:
 - (a) Sealed Composite Exhibit A is a package containing the unredacted copy of Page 27 of the FPSC's Review of the Payment Arrangement Programs offered by the Florida Electric Industry for which PEF seeks confidential treatment. Composite Exhibit A is being submitted separately in a sealed envelope labeled "CONFIDENTIAL." In the unredacted versions, the information asserted to be confidential is highlighted by yellow marker.

COM	_____
<u>AFD</u>	<u>5</u>
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(b) Composite Exhibit B is a package containing two copies of redacted versions of Page 27 for which the Company requests confidential classification. The specific information for which confidential treatment is requested has been blocked out by opaque marker or other means.

(c) Exhibit C is a table which identifies by page and line the information for which PEF seeks confidential classification and the specific statutory bases for seeking confidential treatment.

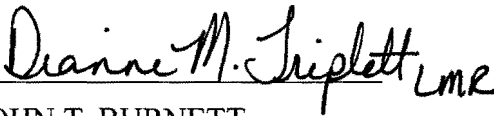
3. As indicated in Exhibit C, the information for which PEF requests confidential classification is “proprietary confidential business information” within the meaning of Section 366.093(3), F.S. Specifically, the information at issue relates to PEF’s internal payment arrangement guidelines and procedures, which if disclosed, could impair the efforts of the Company to protect internal business information. If the information at issue was made public, it could affect customers’ behaviors pertaining to payment arrangement programs and how they do business with PEF. *See* § 366.093(3)(c), F.S.; Affidavit of Kenneth Talbot at ¶ 5. Furthermore, the information at issue relates to internal policies and procedures, the disclosure of which could impair the interests for both PEF and its customers. *Id.* § 366.093(3)(e); Affidavit of Kenneth Talbot at ¶ 6. Accordingly, such information constitutes “proprietary confidential business information” which is exempt from disclosure under the Public Records Act pursuant to Section 366.093(1), F.S.

4. The information identified as Exhibit “A” is intended to be and is treated as confidential by the Company. *See* Affidavit of Kenneth Talbot at ¶ 7. The information has not been disclosed to the public, and the Company has treated and continues to treat its internal guidelines and processes as confidential. *See* Affidavit of Kenneth Talbot at ¶ 7.

5. PEF requests that the information identified in Exhibit A be classified as “proprietary confidential business information” within the meaning of section 366.093(3), F.S., that the information remain confidential for a period of at least 18 months as provided in section 366.093(4) F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

WHEREFORE, for the foregoing reasons, PEF respectfully requests that this Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 26th day of September, 2012.



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Attorneys for
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Exhibit B

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4.0 PROGRESS ENERGY FLORIDA

4.1 COMPLAINTS AND INQUIRIES REGARDING PAYMENT ARRANGEMENTS

Like other Florida IOUs, PEF ratepayers make billing-related calls to the FPSC, and may be indicative of customers who are experiencing hardship in paying their electric utility bills. The numbers of contacts to the FPSC which were warm transferred or resulted in billing complaints over a five-year period for PEF is shown in Exhibit 19. Specifically, in 2007, the FPSC received 1,048 billing inquiries for PEF. In 2008 and 2009, the number increased from 1,799 to 2,820. Since 2009, the number of billing inquiries has steadily decreased from 2,533 in 2010 to 1,494 in 2011. This recent decrease in billing inquiries indicate some recovery in the economy of the PEF service territory.

Year	Warm Transfers	Complaints	Total	Other
2007	829	219	1,048	480
2008	1,545	254	1,799	1,152
2009	2,365	455	2,820	1,751
2010	2,127	406	2,533	1,639
2011	1,253	241	1,494	965

EXHIBIT 19

Source: FPSC Complaint Database

On average, 74 percent of customers who are warm transferred back to PEF have an inquiry regarding payment arrangements. Over the five year period of 2007 through 2011, the Commission received 8,119 billing-related contacts which were warm transferred. FPSC records show that 5,987 of these warm transfers were preliminarily classified as relating to payment arrangements. The trend in payment arrangement warm transfers follows that of the total billing transfers and complaints with a peak in 2009 of 1,751, followed by a downward trend to 1,639 in 2010 and to 965 in 2011.

4.2 PAYMENT ARRANGEMENT MONITORING AND INTERNAL CONTROLS

4.2.1 TRENDS IN PAYMENT ARRANGEMENTS

PEF offers payment arrangements to customers who are having difficulty paying their bills, if the customers meet certain criteria. The payment arrangement typically extends a customer's due date for [REDACTED] from the date of the past due notice. Audit staff reviewed ad-

²¹ The term "warm transferred" refers to a situation where a customer calls the FPSC Call Center and after discussing and documenting the billing complaint details, the FPSC analyst transfers (or "warm transfers") the call to PEF for further assistance.

²² A subset of the number of billing warm transfers which may include both payment arrangement complaints and inquiries.

Exhibit C

**PROGRESS ENERGY FLORIDA
Confidentiality Justification Matrix**

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
FPSC Review of the Payment Arrangement Programs offered by the Florida Electric Industry	Page 27, Section 4.2.1 "Trends in Payment Arrangements", Line 3: payment arrangement term.	<p>§366.093(3)(c), F.S. The document in question contains confidential information, the disclosure of which would impair PEF's security measures, systems or procedures.</p> <p>§366.093(3)(e), F.S. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>