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February 12, 2013

VIA HAND DELIVERY

Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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

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Re: Petition of Progress Energy Florida, Inc. For an Accounting Order to Record in a
Regulatory Asset or Liability the Unrealized and Realized Gains And Losses
Resulting from Financial Accounting Requirements Related to Interest Rate
Derivative Agreements; *Docket No. 120303-EI*

Dear Ms. Cole:

Per Commission Staff's request, attached for filing in this docket are the Treasury
Risk Management Guidelines and Policy ACT-SUBS-00074. Please note that the
Company is evaluating its Treasury Risk Management Guidelines and therefore this
document may change at some point in the future. Please also note that both documents
are confidential and the Company has filed for confidentiality treatment of these
documents.

Thank you for your assistance in this matter. If you should have any questions,
please feel free to contact me at (727) 820-4692.

Sincerely,

Dianne M. Triplett

DMT/lmr
Enclosure

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Progress Energy Florida, Inc. For an Accounting Order to Record in a Regulatory Asset or Liability the Unrealized and Realized Gains And Losses Resulting from Financial Accounting Requirements Related to Interest Rate Derivative Agreements.

Docket No. 120303-EI

Dated: February 12, 2013

**PROGRESS ENERGY FLORIDA INC.'S
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 certain information requested by Staff in the above referenced docket, specifically Progress Energy’s Treasury Risk Management Guidelines (ERM-TREX-00001) and its Derivative Policies and Practices (ACT-SUBS-00074). In support of this Request, PEF states:

1. The documents titled, Treasury Risk Management Guidelines (ERM-TREX-00001) and Derivative Policies and Practices (ACT-SUBS-00074) contain information that is “proprietary business information” under Section 366.093(3), Florida Statutes.

2. The following exhibits are included with this request:

(a) Composite Exhibit A is a package containing unredacted copies of all the documents 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.

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(b) Composite Exhibit B is a package containing two copies of redacted versions of the documents 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 Treasury Risk Management Guidelines (ERM-TREX-00001) and Derivative Policies and Practices (ACT-SUBS-00074) are considered internal company policies, guidelines and procedures which, if disclosed, would cause harm to the company’s business operations. Affidavit of Jim Bass at ¶ 4. As such, the policies and guidelines in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information. *See* § 366.093(3)(e), F.S.; Affidavit of Jim Bass at ¶ 4. 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. PEF notes that it has requested confidentiality of similar internal Risk Management policies and guidelines in connection with Fuel Docket No. 120001-EI. See for example Order No. PSC-12-0448-CFO-EI issued August 28, 2012.

4. The information identified as Exhibit “A” is intended to be and is treated as

confidential by the Company. Affidavit of Jim Bass at ¶ 5. The information has not been disclosed to the public, and the Company has treated and continues to treat the information and contracts at issue as confidential. Affidavit of Jim Bass at ¶ 5.

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 17th day of February, 2013.



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Attorneys for
PROGRESS ENERGY FLORIDA, INC.

Exhibit B

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Progress Energy's Treasury Risk
Management Guidelines
(ERM-TREX-00001)
(19 pages)

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Progress Energy's
Derivative Policies and Practices
(ACT-SUBS-00074)
(54 pages)

Dkt# 120303-EI

Exhibit C

PROGRESS ENERGY FLORIDA Confidentiality Justification Matrix

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
Progress Energy – Treasury Risk Management Guidelines (ERM-TREX-00001)	Entire document	§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.
Progress Energy Derivative Policies and Practices (ACT-SUBS-00074)	Entire document	§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.