#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project, by Progress Energy Florida, Inc.

DOCKET NO. 100437-EI Submitted for Filing: April 5,

## PROGRESS ENERGY FLORIDA, INC.'S NOTICE OF FILING AFFIDAVIT

Progress Energy Florida, Inc. ("PEF" or the "Company"), hereby gives notice of filing of the Affidavit of Alex Glenn in Support of Progress Energy Florida, Inc.'s Fifth Request for Confidential Classification regarding portions of PEF's responses to Staff's Fifth Request for Production (Nos. 16-18).

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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 <u>5th</u> day of April, 2013.

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### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project, by Progress Energy Florida, Inc.

DOCKET NO.: 100437-EI

# AFFIDAVIT OF ALEX GLENN IN SUPPORT OF PROGRESS ENERGY FLORIDA'S FIFTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

COUNTY OF PINELLAS

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

- 1. My name is Alexander Glenn. I am over the age of 18 years old and I have been authorized by Progress Energy Florida, Inc. (hereinafter "PEF" or the "Company") to give this affidavit in the above-styled proceeding on PEF's behalf and in support of PEF's Fifth Request for Confidential Classification. The facts attested to in my affidavit are based upon my personal knowledge.
- 2. I am employed by Progress Energy Florida, Inc. ("PEF" or the "Company") as its President. PEF is now a subsidiary of Duke Energy Corporation ("Duke Energy") as a result of the merger between Duke Energy and Progress Energy, Inc.
- 3. As the Company President I am responsible for achieving the Company's financial and operational goals, advancing the Company's rate and regulatory initiatives, and overseeing state and local regulatory and governmental relations, economic development, and community affairs. In particular, with respect to CR3, my responsibilities included leading the Company's evaluation of whether to repair or retire CR3.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

- 4. In this Request for Confidential Classification, PEF is seeking confidential classification for portions of PEF's responses to Staff's Fifth Request for Production (Nos. 16-18), specifically numbers 16 and 17 in Docket 100437-EI. 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 Exhibit C.
- 5. Portions of the documents responsive to Requests No. 16 and 17 contain proprietary confidential business information related to projected and estimated insurance numbers, the disclosure of which would adversely impact PEF's competitive business interests by disclosing its sensitive business information. Indeed, PEF has a contractual obligation to keep portions of the information confidential based on confidentiality provisions that prohibit the disclosure of the terms.
- 6. If PEF's competitors and counterparties were made aware of such information, they may adjust their behavior in relevant markets and venues. Such information is that Company's proprietary, confidential business information.
- 7. With respect to the information at issue in this request, PEF has kept confidential and has not publicly disclosed this confidential information and strict procedures are established and followed to maintain the confidentiality of the terms of the confidential documents and information at issue, including restricting access to those persons who need the information and documents to assist the Company. At no time has the Company publicly disclosed the confidential information or documents at issue. The Company has treated and continues to treat the information and documents at issue as confidential.

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This concludes my affidavit.
 Further affiant sayeth not.

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Dated this 3 day of April, 2013.

R. Alexander Glenn President – Florida

|  | MENT was sworn to and subscribed before me this 3 day He is personally known to me, or has produced his Driver's license, or his |
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| as identification.   | Direct 3 ficology, of fite   |
|  | (Signature)  |
|  | HELEN M. KYRIHKUR  |
|  | (Printed Name)   |
| (AFFIX NOTARIAL SEAL)  | NOTARY PUBLIC, STATE OF FLORIDA  |
|  | 10-24-2013   |
| HELEN M. KYRIAKOU Commission # DD 926358 Expires October 24, 2013 Bonded Thru Troy Fain Insurance 800-385-7019 | (Commission Expiration Date)   |
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|  | (Serial Number, if any)  |