# BEFORE THE PUBLIC SERVICE COMMISSION ORIGINAL

In Re: Petition for Determination	)	
of Need of Hines Unit 2 Power Plant.	)	DOCKET NO.: 001064-EI
	)	
		Submitted for Filing: October 10, 2000

# NOTICE OF FILING AFFIDAVIT IN SUPPORT OF SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION

Florida Power Corporation hereby gives notice of filing the following item in support of its Request for Confidential Classification:

1. Affidavit of Michael D. Rib in Support of Florida Power Corporation's Second Request for Confidential Classification.

Respectfully submitted,

FLORIDA POWER CORPORATION

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DOCUMENT NUMBER-DATE

12900 OCT 108

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been firnished via Federal Express to Deborah D. Hart, as counsel for Florida Public Service Commission, and by U.S. Mail to all other parties of record this  $9^{th}$  day of October, 2000.

PARTIES OF RECORD:

Deborah D. Hart Legal Division Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Myron Rollins Black & Veatch P.O. Box 8405 Kansas City, MO 64114 Buck Oven Siting Coordination Office Department of Environmental Protection 2600 Blairstone Road Tallahassee, FL 32301

Paul Darst Strategic Planning Department of Community Affairs 2740 Centerview Drive Tallahassee, FL 32399-2100

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination	)	Docket No.: 001064-EI
of Need of Hines Unit 2 Power Plant.	)	
	)	Submitted for Filing: October 10, 2000

## AFFIDAVIT OF MICHAEL D. RIB IN SUPPORT OF FLORIDA POWER CORPORATION'S SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

#### COUNTY OF PINELLAS

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

- 1. My name is Michael D. Rib. I am over the age of 18 years old and I have been authorized by Florida Power Corporation (hereinafter referred to as "FPC" or the "Company"), to give this affidavit in the above-styled proceeding on FPC's behalf and in support of FPC's Second Request for Confidential Classification.
- 2. I am currently employed by FPC as the Director of FPC's Resource Planning. I have held that position and precursors to that position with FPC for five (5) years. I have worked for FPC since 1981, and I have worked in FPC's Resource Planning Department (formerly called Generation Planning), since 1995.
- 3. The facts alleged in my affidavit are based upon my personal knowledge or upon records maintained in the ordinary course of FPC's business, as part of regularly conducted business activity, by or from information transmitted by a person with knowledge of the events described therein, at or near the time of the event described, under my personal custody and control or the custody and control of FPC's Resource Planning.

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- 4. As the Director of FPC's Resource Planning, I was and I am responsible, along with other members of FPC's Resource Planning, for providing information in response to Staff's First Set of Interrogatories to FPC. As a result, I have read the Interrogatories and prepared, assisted in preparing, or reviewed FPC's answers to the Interrogatories. With respect to Interrogatories 24 and 25, FPC's answers contain proprietary, confidential business information.
- 5. FPC requests confidential classification of the answer to Interrogatory 24 and part of the answer to Interrogatory 25; that part dealing with FPC's projected capacity factors for each of its units. Both answers were drawn from a more in-depth modeling of FPC's system and, therefore, represent detailed operating forecasts for FPC's system. This information is proprietary to FPC's system, and it is highly confidential, business information that FPC has not and does not make public. The disclosure of such sensitive information to the public obviously could potentially harm both the Company and its ratepayers. For this reason, FPC requests confidential classification of its answer to Interrogatory 24 and part of its answer to Interrogatory 25.
- 6. The Company keeps the proprietary, operating forecast information confidential within FPC, making such information available to only those employees who need to know the information in order to perform their responsibilities for the Company. At no time has the Company publicly disclosed the proprietary, operating forecast information contained in the answers to Interrogatories 24 and 25, even to the Florida Public Service Commission. The Company has treated and continues to treat this information as confidential.
  - 7. This concludes my affidavit.

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(Signature)

Michael D. Rib (Printed Name)

Address: Director

Resource Planning

Further affiant sayeth not.

Dated the  $6^{-\tau}$  day of October, 2000.