

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Progress Energy Florida, Inc.  
to establish discovery docket regarding actual and  
projected costs for the Levy Nuclear Project

Docket No. 080149 - **ET**

Submitted for Filing: May 22, 2008

**AFFIDAVIT OF DANIEL L. RODERICK IN SUPPORT OF  
PROGRESS ENERGY FLORIDA'S SECOND  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF CITRUS

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

1. My name is Daniel L. Roderick. 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 Request for Confidential Classification. The facts attested to in my affidavit are based upon my personal knowledge.

2. I am the Vice President of Nuclear Projects and Construction for PEF's nuclear plant. This department manages nuclear generation growth strategies.

3. As the Vice President of Nuclear Projects and Construction, I am responsible for all aspects of major projects and construction of nuclear generating assets in Florida, including the administration of PEF's contracts for the Crystal River 3 ("CR3") Uprate project and ongoing project analysis.

4. PEF is seeking confidential classification for portions of Ms. Cross' testimony in support of the estimated/actual costs, Ms. Cross's testimony in support of the projected costs, my

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testimony in support of estimated/actual and projected costs, and Exhibit Numbers LC-1, LC-2, LC-4, and LC-5. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's Second Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's Second Request for Confidential Classification as Exhibit C. PEF is requesting confidential classification of this information because public disclosure of the information in question would violate confidentiality agreements between PEF and its nuclear vendors and would impair PEF's ability to contract for nuclear goods and services on competitive and favorable terms.

5. Portions of these testimonies and exhibits contain contractual terms and details regarding ongoing contracts PEF has with various nuclear vendors. PEF must be able to assure these vendors that sensitive business information, such as the terms of their contracts, will be kept confidential. Indeed, some of the contracts at issue contain confidentiality provisions that prohibit the disclosure of the terms of the contract to third parties. Specifically, the information at issue relates to competitively negotiated contractual data, such as quantity and pricing of goods and services, and other contractual terms, the disclosure of which would impair the efforts of the Company to negotiate these contracts on favorable terms. If other third parties were made aware of confidential contractual terms that PEF has with other parties, they may offer PEF less competitive contractual terms in future contractual negotiations. Without PEF's measures to maintain the confidentiality of sensitive terms in contracts between PEF and these nuclear contractors, the Company's efforts to obtain competitive contracts for the CR3 Uprate project could be undermined.

6. Upon receipt of all this confidential information, and with its own confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons

who need the information to assist the Company, and restricting the number of, and access to the information and contracts. At no time since negotiating and receiving the contracts and doing the project analyses in question has the Company publicly disclosed that information or contracts. The Company has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 21<sup>st</sup> day of May, 2008.

(Signature)

Daniel L. Roderick  
Vice President  
Nuclear Projects and Construction  
Crystal River Unit 3  
Crystal River Energy Complex  
Site Administration 2C  
15760 West Power Line Street  
Crystal River, Florida 34428

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 21<sup>st</sup> day of May, 2008 by Daniel L. Roderick. He is personally known to me, or has produced his \_\_\_\_\_ driver's license, or his \_\_\_\_\_ as identification.



Katrina Cleaver-Cochran  
Commission # DD497902  
Expires February 2, 2010  
Bonded Troy Fain Insurance Inc 800-385-7019

(AFFIX NOTARIAL SEAL)

(Signature)

KATRINA CLEAVER COCHRAN

(Printed Name)

NOTARY PUBLIC, STATE OF FLORIDA

2-2-2010

(Commission Expiration Date)

(Serial Number, If Any)

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