

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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COMMISSION
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In re: Nuclear Power Plant Cost
Recovery Clause

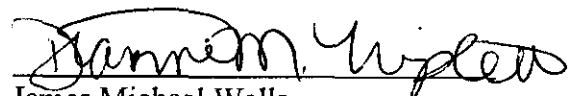
Docket No. 080009-EI

Submitted for Filing: August 21, 2008

**PROGRESS ENERGY FLORIDA, INC'S
NOTICE OF FILING AFFIDAVIT IN SUPPORT OF PEF'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION AS TO THE
TESTIMONY OF WILLIAM R. JACOBS, JR.**

Progress Energy Florida, Inc. hereby gives notice of filing the affidavit of Daniel L. Roderick in support of its Request for Confidential Classification as to the Testimony of William R. Jacobs, Jr. filed by the Office of Public Counsel filed July 23, 2008 and revised July 31, 2008.

Respectfully submitted,



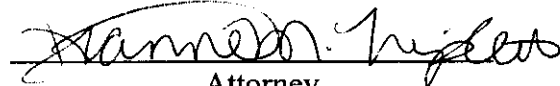
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R. Alexander Glenn
General Counsel
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COMPANY, LLC
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Telephone: (727) 820-5587
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COM _____
ECR 1
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OPC _____
RCP _____
SSC _____
SGA _____
ADM _____
CLK _____

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 service and U.S. Mail this 21st day of August, 2008.


Attorney

<p>Mr. Paul Lewis, Jr. Progress Energy Florida, Inc. 106 East College Avenue, Ste. 800 Tallahassee, FL 32301-7740 Phone: (850) 222-8738 Facsimile: (850) 222-9768 Email: paul.lewisjr@pgnmail.com</p>	<p>Lisa Bennett Jennifer Brubaker Staff Attorney Florida Public Service Commission 2540 Shumard Oak Blvd Tallahassee 32399 Phone: (850) 413-6218 Facsimile: (850) 413-6184 Email: lbennett@psc.state.fl.us Jbrubake@psc.state.fl.us</p>
<p>Stephen C. Burgess Associate Counsel Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400 Phone: (850) 488-9330 Email: burgess.steve@leg.state.fl.us</p>	<p>R. Wade Litchfield John Butler Florida Power & Light 700 Universe Boulevard Juno Beach, FL 33408-0420 Phone: (561) 691-7101 Facsimile: (561) 691-7135 Email: wade_litchfield@fpl.com John_butler@fpl.com</p>
<p>John W. McWhirter McWhirter Law Firm 400 North Tampa Street, Ste. 2450 Tampa, FL 33602 Phone: (813) 224-0866 Facsimile: (813) 221-1854 Email: jmcwhirter@mac-law.com</p>	<p>James W. Brew Brickfield Burchette Ritts & Stone, PC 1025 Thomas Jefferson St NW 8th FL West Tower Washington, DC 20007-5201 Phone: (202) 342-0800 Fax: (202) 342-0807 Email: jbrew@bbrslaw.com -and-</p>
<p>Michael B. Twomey AARP Post Office Box 5256 Tallahassee, FL 32305 Phone: (850) 421-9530 Email: Miketwomey@talstar.com</p>	<p>Karin S. Torain PCS Administration (USA), Inc. Suite 400 Skokie Blvd. Northbrook, IL 60062 Phone: (847) 849-4291 Email: KSTorain@potashcorp.com</p>

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost
Recovery Clause

Docket No. 080009-EI

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**AFFIDAVIT OF DANIEL L. RODERICK IN SUPPORT OF PROGRESS ENERGY
FLORIDA'S REQUEST FOR CONFIDENTIAL CLASSIFICATION
AS TO WILLIAM R. JACOBS, JR. TESTIMONY**

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 a portion of the Direct Testimony of William R. Jacobs, Jr., Ph.D. on behalf of the Citizens of the State of Florida filed July 31, 2008. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's 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. A portion of the testimony contains a cost figure that reveals 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 _____ day of August, 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 ___ day of August, 2008 by Daniel L. Roderick. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

(Signature)

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF _____

(Commission Expiration Date)

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7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 20th day of August, 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 20th day of August, 2008 by Daniel L. Roderick. He is personally known to me, ~~or has produced his~~ driver's license, or his DM as identification.

Charlene Miller
(Signature)

Charlene Miller
(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF Florida, County of Citrus

11-11-08
(Commission Expiration Date)

