

**ATTACHMENT C**

**PROGRESS ENERGY FLORIDA**

**In re: Petition for Increase in Rates By Progress Energy Florida, Inc.**

**Docket No. 090079-EI**

**PEF's Eighth Request for Confidential Classification as to Staff's**

**Thirteenth Request for Production of Documents**

**Confidentiality Justification Matrix**

<b>DOCUMENT/RESPONSES</b>	<b>PAGE/LINE</b>	<b>JUSTIFICATION</b>
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000007 through 09RP-STAFFPOD13-70-000022	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000031 through 09RP-STAFFPOD13-70-000046	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000053 through 09RP-STAFFPOD13-70-000067	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000074 through 09RP-STAFFPOD13-70-000089	Entire document minus title page	§366.093(3)(e), Fla. Stat. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the

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		provider/owner of the information.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000096 through 09RP-STAFFPOD13-70-000110	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000117 through 09RP-STAFFPOD13-70-000131	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000138 through 09RP-STAFFPOD13-70-000152	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000159 through 09RP-STAFFPOD13-70-000173	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.

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Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000180 through 09RP-STAFFPOD13-70-000200	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000207 through 09RP-STAFFPOD13-70-000226	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000233 through 09RP-STAFFPOD13-70-000251	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-000258 through 09RP-STAFFPOD13-70-000276	Entire document minus title page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of	All numerical information within the table	§366.093(3)(e), Fla. Stat. The document in question

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Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13- 70-348		contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13- 70-349	All information within the columns titled Amount, Source and Long-Term Assumption; All information in Margin table	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13- 70-350	All information within the columns titled Item, Amount, Source and Long-Term Assumption; All information in Margin table	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13- 70-351	All information within the columns titled Item, Amount, Source and Long-Term Assumption	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates	All information within the columns titled Item, Amount, Source and Long-Term Assumption	§366.093(3)(e), Fla. Stat. The document in question contains confidential information relating to

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number 09RP-STAFFPOD13-70-352		competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-353	All numerical information within the columns titled 2008 Moody's and 2007 Moody's	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-354	All numerical information within the columns titled 2008 Moody's and 2007 Moody's	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-355	All information in two tables at the bottom on the page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13th Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-358	All numerical information within the table	§366.093(3)(e), Fla. Stat. The document in question contains confidential information relating to competitive business interests, the disclosure of

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		which would impair the competitive business of the provider/owner of the information.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-70-359	All information below blue line listed in four bullets	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000001 through 09RP-STAFFPOD13-71-000052	Entire document	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000053	Entire page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000054	Entire page	§366.093(3)(e), Fla. Stat. The document in question contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the

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		provider/owner of the information.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000055	Entire page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000056	Entire page	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000057 through 09RP-STAFFPOD13-71-000100	Entire document	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000101 through 09RP-STAFFPOD13-71-000128	Entire document	§366.093(3)(e), Fla. Stat. 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.

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Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000129 through 09RP-STAFFPOD13-71-000148	Entire document	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000149 through 09RP-STAFFPOD13-71-000153	Entire document	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000154 through 09RP-STAFFPOD13-71-000161	Entire document	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000162 through 09RP-STAFFPOD13-71-000172	Entire document	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of	Entire document	§366.093(3)(e), Fla. Stat. The document in question



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Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000173 through 09RP-STAFFPOD13-71-000178		contains confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-71-000179 through 09RP-STAFFPOD13-71-000181	Entire document	§366.093(3)(e), Fla. Stat. 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.
Response to Staff's 13 <sup>th</sup> Request for Production of Documents No. 67-96 Document bearing bates number 09RP-STAFFPOD13-90-000033 through 09RP-STAFFPOD13-90-000038	Entire document	§366.093(3)(d), Fla. Stat. The document portions in question contain confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.  §366.093(3)(e), Fla. Stat. 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.