BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Progress Energy Florida Inc.'s Responses to Staff's 2011 Ten-Year Site Plan Supplemental Data Request #2.

Docket No. Undocketed

Dated: May 6, 2011

NOTICE OF FILING AFFIDAVIT IN SUPPORT OF REQUEST FOR CONFIDENTIAL CLASSIFICATION

Progress Energy Florida, Inc., ("PEF" or "Company"), by and through their undersigned counsel, hereby gives notice of filing the Affidavit of David W. Gammon as Senior Power Delivery Specialist of PEF Efficiency & Innovative Technology Department in support of PEF's Request for Confidential Classification requesting that certain information provided in PEF's response to Staff's 2011 Ten-Year Site Plan Supplemental Data Request #2 (Nos. 1-5) be classified as confidential.

Respectfully submitted this 6th day of May, 2011.

ALEXANDER GLENN

General Counsel - Florida

JOHN T. BURNETT

Associate General Counsel - Florida

Progress Energy Service Company, LLC

Post Office Box 14042

St. Petersburg, Florida 33733-4042

Telephone: 727-820-5184

Facsimile: 727-820-5249

Email: john.burnett@pgnmail.com

Attorneys for

PROGRESS ENERGY FLORIDA, INC.

DOCUMENT NUMBER-DATE

03163 MAY - 6 =

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Progress Energy Florida, Inc.'s Responses to Staff's 2011 Ten-Year Site Plans - Supplemental Data Request #2.

Docket No. Undocketed

Dated: May 6, 2011

AFFIDAVIT OF DAVID W. GAMMON IN SUPPORT OF PROGRESS ENERGY FLORIDA'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

STATE OF FLORIDA

COUNTY OF PINELLAS

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

- 1. My name is David W. Gammon. 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 a Senior Power Deliver Specialist in the Efficiency & Innovative Technology Department. This section is responsible for acquisition of the Qualifying Facilities contracts (Cogeneration and Renewable resources) for the PEF system.
- 3. As a Senior Power Deliver Specialist, I am responsible, along with the other members of the section, for the administration of the Qualifying Facilities contracts (Cogeneration and Renewable contracts) with various suppliers for PEF's system.

1

- 4. PEF is seeking confidential classification for portions of its responses to Question #2 of Staff's 2011 TYSP Supplemental Data Request #2 submitted on March 3, 2011. 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 of this information because it contains sensitive business information, the disclosure of which would impair the Company's efforts to contract for goods or services on favorable terms.
- options/contracts that provide economic value to PEF and its ratepayers. In order to obtain such contracts, however, PEF must be able to assure renewable suppliers that sensitive business information, such as payment amounts and costs/kWh, will be kept confidential. With respect to the information at issue in this Request, PEF has kept confidential and has not publicly disclosed confidential information such as total payment amounts and costs/kWh. Absent such measures, renewable suppliers would run the risk that sensitive business information that they provided in their contracts with PEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who otherwise would contract with PEF might decide not to do so if PEF did not keep specific information confidential. Without PEF's measures to maintain the confidentiality of sensitive terms in contracts between PEF and renewable suppliers, the Company's efforts to obtain renewable contracts could be undermined.

- 6. Additionally, the disclosure of confidential information in PEF's renewable contracts, could adversely impact PEF's competitive business interests. If such information was disclosed to PEF's competitors, PEF's efforts to obtain competitive renewable supply options that provide economic value to both PEF and its ratepayers could be compromised by PEF's competitors changing their consumption or purchasing behavior within the relevant markets.
- 7. Upon receipt of confidential information from renewable suppliers, 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 contract information. At no time since receiving the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information and contracts at issue as confidential.
 - 8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 4 day of May, 2011.

(Signature)
David W. Gammon
Senior Power Deliver Specialist
Efficiency & Innovative Technology Department
Progress Energy Florida
299 First Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this day of May, 2011 by David W. Gammon. He is personally known to me or has produced her driver's license, or his as identification.	
DARA TRIBIANO Notary Public - State of Florida 1 My Edwin Ledire Dol'36, 2012 Commission # DO 810750 Sended Through National Notary Assn.	(Signature) Dara Tribiano (Printed Name) NOTARY PUBLIC, STATE OF Florida (Commission Expiration Date)

(Serial Number, If Any)