

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost recovery
clause.

Docket No. 090002-EG

Submitted for Filing: October 26, 2009

**AFFIDAVIT OF NANCY L. HOLDSTEIN 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 Nancy L. Holdstein, who being first duly sworn, on oath deposes and says that:

1. My name is Nancy L. Holdstein. 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 Principal Regulatory Specialist in the Utility Regulatory Planning Department at Progress Energy Service Company, LLC. I am responsible for cost of service issues including the determination of jurisdictional and class cost of service, rate design, and tariff administration matters for Progress Energy Florida. I have personal knowledge concerning the interruptible service rate class for commercial, industrial and public authority customer billing usage.

DOCUMENT NUMBER-DATE

10884 OCT 27 8

FPSC-COMMISSION CLERK

3. PEF is seeking confidential classification of portions of the responsive documents to the Florida Industrial Power Users Group's ("FIPUG") First Request for Production of Documents. A detailed description of the confidential information at issue is contained in confidential Attachment 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 it includes confidential and proprietary information related to the Company's customer's competitive business interests, the disclosure of which would compromise PEF's customer's competitive business interests.

4. Specifically, the documents produced in response to this Request for Production includes confidential information regarding the customer interruptible service kWh usage. Specifically, these documents include customer specific data detailing customer billing determinants including annual usage, KW, KWH, on/off peak, and load factor that could disadvantage PEF's customers. Electric costs are a significant component of some PEF customer total costs and releasing this information could give a customer's competitors an advantage if they knew what their competitor's electric costs were. Disclosure of the electric costs paid by Progress Energy's customers would provide an unfair advantage to competitors pursuing such customers. For example, if a customer's suppliers or providers were made aware of the customer's electric usage, they may adjust their behavior in the market place with respect to activity such as pricing and the provision of goods, materials, and services. Such suppliers and providers may decrease supply of such goods and services, and/or increase the cost and prices of such goods and services. This information would impair PEF customer's competitive business interests by providing third parties with sensitive information which third parties could use as a

competitive advantage. Therefore, public disclosure of this information could adversely affect PEF customer's competitive business interests and ultimately having a detrimental impact on PEF's ratepayers.

5. Strict procedures are established and followed to maintain the confidentiality 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. 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 at issue as confidential. In addition, PEF has provided this information in response to various discovery requests throughout this proceeding, and at all times the Company has maintained the confidentiality of the information at issue.

6. This concludes my affidavit.

Further affiant sayeth not.

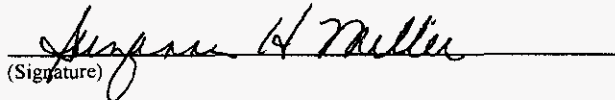
Dated the 26th day of October, 2009.



(Signature)

Nancy L. Holdstein
Principal Regulatory Specialist
299 First Avenue North PEF-131
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 26th day of October, 2009 by Nancy L. Holdstein. She is personally known to me, or has produced her October driver's license, or her _____ as identification.



(Signature)

(AFFIX NOTARIAL SEAL)



Suzanne H. Miller
(Printed Name)

NOTARY PUBLIC, STATE OF FL

3/27/2013
(Commission Expiration Date)

(Serial Number, If Any)