

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost recovery
clause.

Docket No. 090002-EG

Submitted for Filing: October __, 2009

**AFFIDAVIT OF BRUCE BARKLEY IN SUPPORT OF PROGRESS ENERGY
FLORIDA'S REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF WAKE

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

1. My name is Bruce Barkley. 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 Manager of Fuel Forecasting and Regulatory support in the Fuels and Power Optimization Department. My primary duties include the preparation of fuel forecasts, support of fuel-related regulatory proceedings, and internal reporting of fuel costs.
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

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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 competitive business interests, the disclosure of which would compromise PEF's competitive business interests.

4. Specifically, the documents produced in response to this Request for Production includes confidential information regarding the Company's projected fuel costs. Specifically, these documents include the Company's projected Spot and Hedge natural gas, oil, and coal costs, as well as the projected nitrous-oxide emissions allowance price forecast. Also included in these responsive documents is information related to contractually agreed upon fuel prices from various Purchase Power Agreements ("PPAs"), which are subject to agreed upon contractual confidentiality provisions. Disclosure of this information would impair PEF's competitive business interests by providing third parties with sensitive information which would provide third parties a competitive advantage when negotiating contracts related to such commodities in the future. Therefore, public disclosure of this information could adversely affect the Company's ability to purchase these commodities at advantageous prices, therefore impacting the Company's competitive 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 16th day of October, 2009.

Bruce Barkley
(Signature)
Bruce Barkley
Manager – Fuel Forecasting and Regulatory Support
410 S. Wilmington Street, PEB-10A
Raleigh, NC 27601

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 16th day of October, 2009 by Bruce Barkley. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

Donna J. Sears
(Signature)
DONNA J. SEARS
(Printed Name)
NOTARY PUBLIC, STATE OF NC
8/23/2014
(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)

(Serial Number, If Any)