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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost
Recovery Clause

Docket No. 110009-EI
Submitted for Filing: April 27, 2011

**PROGRESS ENERGY FLORIDA, INC.'S SECOND REQUEST FOR
CONFIDENTIAL CLASSIFICATION REGARDING THE COMPANY'S RESPONSES TO
OPC'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF
INTERROGATORIES TO PROGRESS ENERGY FLORIDA**

Progress Energy Florida, Inc. ("PEF" or the "Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(3), Florida Administrative Code, files this Request for Confidential Classification regarding portions of the responses to the Office of Public Counsel's ("OPC" or "Citizens") First Set of Interrogatories (Nos. 1-3), specifically the document produced in response to interrogatory number 1 and 2, and OPC's First Request for Production of Documents (Nos. 1-7), specifically documents responsive to request numbers 1, 2, 3, 4 and 5. PEF is seeking confidential classification of this information because it contains contractual and financial information the release of which would harm the Company's competitive interests (and that is subject to confidentiality provisions in many cases), and because the release of certain other information would harm the Company's competitive interests. This information meets the definition of "proprietary confidential business information." See § 366.093(3), Fla. Stat.

An unredacted version of the documents discussed above is being filed under seal with the Commission as Appendix A on a confidential basis to keep the competitive business information in those documents confidential.

In further support of this Request, PEF states as follows:

- claim of confidentiality
- notice of intent
- request for confidentiality
- filed by OPC

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DOCUMENT NUMBER + DATE
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APA	<u>1</u>
ECR	<u>3</u>
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RAD	_____
SSC	_____
ADM	_____
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The Confidentiality of the Documents at Issue

Section 366.093(1), Florida Statutes, provides that “any records received by the Commission which are shown and found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from [the Public Records Act].” § 366.093(1), Fla. Stat. Proprietary confidential business information means information that is (i) intended to be and is treated as private confidential information by the Company, (ii) because disclosure of the information would cause harm, (iii) either to the Company’s ratepayers or the Company’s business operation, and (iv) the information has not been voluntarily disclosed to the public. § 366.093(3), Fla. Stat. Specifically, “information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms” is defined as proprietary confidential business information. § 366.093(3)(d), Fla. Stat. Additionally, subsection 366.093(3)(e) defines “information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information,” as proprietary confidential business information.

Confidential Information

As listed above, and described more thoroughly below and in the affidavits of Sue Hardison and Jon Franke filed with this Request, portions of the Company’s responses to OPC’s First Request for Production of Documents and First Set of Interrogatories contain confidential, proprietary business information relating to the Engineering, Procurement and Construction Agreement (“EPC Agreement”) for the Levy Nuclear Project (“LNP”), contractual information related to the Extended Power Uprate License Amendment Request (“EPU LAR”) document and supporting engineering analysis for the Crystal River Unit 3 (“CR3”) Power Uprate Project (“CR3 Uprate”, and collectively with LNP, the “Nuclear

Projects”), as well as presentations given to, and meeting minutes of, the Company’s Senior Management and Board of Directors, and the Company’s Integrated Project Plans (“IPPs”).

More specifically, the responsive documents to Citizens’ requests for production number 2, 3, 4, and 5 and interrogatory number 1 and 2, contain confidential and sensitive contractual information and numbers regarding the Company’s CR3 Uprate vendors and the EPU LAR document preparation, the disclosure of which would impair PEF’s competitive business interests and ability to negotiate favorable contracts, as well as violate contractual nondisclosure provisions. See Affidavit of Jon Franke, ¶ 4. Additionally, included in these responses are confidential presentations provided to senior management and minutes of the meetings where those presentations were discussed. Publication of this non-publicly-available information would provide PEF’s competitors and third-parties with whom PEF would wish to contract with valuable insight into the Company’s strategic goals and planning, thereby harming PEF’s competitive business interests. See id.

The responses to Citizens’ requests for production numbers 3 and 4 contain confidential contractual numbers and terms under the EPC Agreement with Westinghouse, Shaw, Stone & Webster (the “Consortium”) as well as cost numbers and information relating to on-going negotiations with the Consortium and its vendors and preliminary decisions regarding disposition of items of Long Lead Equipment (“LLE”) for the LNP. See Affidavit of Hardison, ¶ 4. Additionally, included in these responses are confidential presentations provided to senior management and minutes of the meetings where those presentations were discussed. Publication of this non-publicly-available information would provide PEF’s competitors and third-parties with whom PEF would wish to contract with valuable insight into the Company’s strategic goals and planning, thereby harming PEF’s competitive business interests. See id.

Certain of these documents contain contractual quantities and pricing arrangements and payments made between PEF and its vendors that would adversely impact PEF's competitive business interests if disclosed to the public. See Affidavit of Hardison, ¶ 5; Affidavit of Franke, ¶ 5. PEF must be able to assure third parties that enter contractual agreements with the Company that sensitive business information, such as the pricing, payment, and quantity terms of their contracts, will be kept confidential. See Affidavit of Hardison, ¶ 5; Affidavit of Franke, ¶ 5. Indeed, some of the contracts at issue contain confidentiality provisions that prohibit the disclosure of the terms of the contract to third parties. Affidavit of Hardison, ¶¶ 5-6; Affidavit of Franke, ¶¶ 5-6.

The information at issue relates to competitively negotiated contractual data, including sensitive pricing information and other contractual details, and on-going negotiations of contractual change order terms, the disclosure of which would impair the efforts of the Company to negotiate such contracts and change orders on favorable terms. See § 366.093(3)(d), Fla. Stat.; Affidavit of Hardison, ¶¶ 5-6. If 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 and it would impair PEF in on-going negotiations. See Affidavit of Hardison, ¶¶ 5-6; Affidavit of Franke, ¶¶ 5-6. Absent the Company's measures to maintain the confidentiality of sensitive terms in contracts between PEF and vendors, the Company's efforts to obtain competitively priced supply and service contracts could be undermined. See Affidavit of Hardison, ¶¶ 5-6; Affidavit of Franke, ¶¶ 5-6.

Strict procedures are established and followed to maintain the confidentiality of the terms of all of the confidential documents and information at issue, including restricting

access to those persons who need the information and documents to assist the Company. See Affidavit of Franke, ¶ 7; Affidavit of Hardison, ¶ 7.

At no time has the Company publicly disclosed the confidential information or documents at issue; PEF has treated and continues to treat the information and documents at issue as confidential. See Affidavit of Franke, ¶ 7; Affidavit of Hardison, ¶ 7. PEF requests this information be granted confidential treatment by the Commission.

Conclusion

The competitive, confidential information at issue in this Request fits the statutory definition of proprietary confidential business information under Section 366.093, Florida Statutes, and Rule 25-22.006, F.A.C., and therefore that information should be afforded confidential classification. In support of this motion, PEF has enclosed the following:

(1) A separate, sealed envelope containing one copy of the confidential Appendix A to PEF's Request for which PEF intends to request confidential classification with the appropriate section, pages, or lines containing the confidential information highlighted. **This information should be accorded confidential treatment pending a decision on PEF's Request by the Commission;**

(2) Two copies of the documents with the information for which PEF intends to request confidential classification redacted by section, pages, or lines where appropriate as Appendix B; and,


(3) A justification matrix of the confidential information contained in Appendix A supporting PEF's Request, as Appendix C.

WHEREFORE, PEF respectfully requests that the redacted portions of the responses to OPC's First Set of Interrogatories (Nos. 1-3), specifically responses to interrogatory

numbers 1 and 2, and OPC's First Request for Production of Documents (Nos. 1-7), specifically documents responsive to request numbers 1, 2, 3, 4, and 5, be classified as confidential for the reasons set forth above.

Respectfully submitted this 27th day of April, 2011.

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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 and U.S. Mail this 27th day of April, 2011.



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REDACTED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost Recovery
Clause

Docket No. 110009-EI

**Second Request for Confidential Classification
Exhibit B**

DOCUMENT NUMBER-DATE
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April 28, 2010 Levy Nuclear Project

program management of Levy Nuclear Power Plant Program.	
May –August 2009	[REDACTED]
	<ul style="list-style-type: none"> • Parallel Track – Base load transmission schedule, scope, budget and work plan revised.
July 8, 2009	<ul style="list-style-type: none"> • Atomic Safety Licensing Board (ASLB) admits 3 contentions for hearing.
July 28, 2009	<ul style="list-style-type: none"> • Consortium meeting. Discussion of structure of Consortium six scenarios report.
August 11, 2009	<ul style="list-style-type: none"> • Site Certification Application (SCA) Approval (signed on August 26, 2009.)
August 13, 2009	<ul style="list-style-type: none"> • Six Scenario Analysis results received. • Consortium priced 24/18 and 36/18 scenarios but does not price 60 month suspension scenarios due to concerns with ability to maintain supply chain agreements.
August 2009 – October 2009	<ul style="list-style-type: none"> • PEF taking results of scenario analysis and conducting ongoing dialogue regarding clarification, review of costs analysis, estimates, etc. • Based on consortium's analysis PEF back to fill in the gaps from Consortium scenarios for SMC discussion. As of August PEF's focus was 36/18 scenario.
October 15, 2009	<ul style="list-style-type: none"> • SMC Presentation. SMC asked for a longer term partial suspension scenario. Not satisfied that 36/18 schedule is best option. Key issues: Minimize impact to Rate Payers, Minimize Near Term Cash Flow, Maximize Flexibility, and help Keep Value of EPC. • Options (1) Cancel Project (2) Cancel EPC (finish COL) (3) Cancel Purchase Orders for Long Lead Materials, Suspend EPC. Keep Value of Contract (4) Continue with Base Case (36/18)
October 15, 2009	<ul style="list-style-type: none"> • NRC Sends Letter to Westinghouse regarding AP1000 DCD Revision 17, indicating that modifications to the shield building are needed.
October 23, 2009	<ul style="list-style-type: none"> • Scenarios work complete. • Preliminary Consortium discussion regarding potential long-term suspension and [REDACTED]
October 26, 2009	<ul style="list-style-type: none"> • Bill Johnson and Jeff Lyash call with Consortium CEOs to discuss options. [REDACTED] also discussed. • Consortium agreed to negotiate a long term suspension and [REDACTED]
Oct 2009 – Dec 2009	<ul style="list-style-type: none"> • Negotiations around Purchase Orders for Long Lead Materials disposition, Levy partial suspension, and continuing work scope. • 2nd round of PO dialogue is held. Every Purchase Order is a separate discussion and decision.
December 16, 2009	<ul style="list-style-type: none"> • Consortium meetings, continuing discussion on amendment terms and schedule shift [REDACTED]

10PMA-DR4LEVY-3S1-000007
 DOCUMENT NUMBER - DA10NC-OPCPOD3-60-000007
 11PMA-DR1LEVY-11-000007
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April 28, 2010 Levy Nuclear Project

December 29, 2009	<ul style="list-style-type: none"> Amendment 1 to EPC and Fuels contract executed for Levy Partial Suspension is effective to allow for [REDACTED]
December 31, 2009	<ul style="list-style-type: none"> Deadline for [REDACTED]
February 15, 2010	<ul style="list-style-type: none"> SMC Presentation on Options: (1) 36 month shift (2) Cancel (3) Suspend.
March 5, 2010	<ul style="list-style-type: none"> Amendment 2 to EPC and Fuels Contract executed [REDACTED]
March 8, 2010	<ul style="list-style-type: none"> SMC presentation on schedule options, disposition of Purchase Orders for Long Lead Materials, Continuing work scope, and terms and conditions of Amendment 3 to EPC.
March 17, 2010	<ul style="list-style-type: none"> BOD approval prior to execution of Amendment 3 to Fuels and EPC contracts
March 19, 2010	<ul style="list-style-type: none"> Amendment 3 to Fuels Agreement executed [REDACTED]
March 25, 2010	<ul style="list-style-type: none"> Amendment 3 to EPC Contract executed.

RECOMMENDATION

Consistent with Senior Management and Board decisions, the Project Team recommends continued funding of the Levy Project in the amounts set forth below through 2012. This funding will allow the Company to preserve the long-term benefits of nuclear generation – improved fuel portfolio diversity, reduced reliance on fossil fuels, carbon free energy generation, and base load capacity at a low cost fuel source. It will also allow for the deferral of significant capital investment until after the COL is obtained, which will benefit PEF's customers by reducing the near-term project costs during the immediate recessionary period. It also benefits the Company by deferring capital expenditures to a later time period when the Company may benefit from, among other things, additional certainty with respect to federal and state energy policy, plant licensing, and improved economic and financial conditions.

2. SCOPE UPDATE

Although the overall project scope has not changed, there are some updates regarding the NRC licensing process. The original licensing scope included a request for a Limited Work Authorization (LWA) and a Combined Operating License Application (COL). The LWA was withdrawn by Progress

April 28, 2010 Levy Nuclear Project

Transmission Operations, as well. This sub-project was scheduled in two-phases, with the Levy Project assuming costs for Phase I, and Transmission Operations assuming responsibility of Phase II. It had previously been determined that CFS sub would require expansion to accommodate the additional generation from Levy. A second expansion had been identified by Transmission Operations that was to be constructed subsequent to the Levy work to address Transmission Planning needs for additional transformer capacity. As the schedule for the Levy Project remained uncertain at year-end, Transmission management and Levy Project Team together determined that it was likely that Transmission's expansion needs would precede the Levy need and the cost and planning adjustments noted above were made. The Levy Project continues to carry costs associated with the Levy-required expansion phase in its total cost.

PEF continues to review the impact of the schedule shift on the transmission portion of the LNP. Most of the activities will be deferred past receipt of the COL and will be rescheduled based on new in-service dates for the Levy Plants and additional system planning studies that may impact overall Levy Transmission project scope will be performed as needed.

3. COST UPDATE

An updated construction and milestone payment schedule will be negotiated with the consortium nearer to receipt of the LNP COL when pre-license risks are mitigated. In order to complete an updated project baseline estimate, target in-service dates were assumed that are consistent with the Company's desire to minimize near-term spending while maintaining long-term flexibility. This estimate assumes Unit 1 goes in service mid-year 2021, and Unit 2 in-service follows eighteen months later. The table below provides the key components of the estimate range:

#	Description	Est. Costs (Millions \$s)
1	Transmission	
2	T-Lines	
3	Substations	
4	Real Estate	
5	PE Indirects / Staffing	
6	Owner Contingency	
7	Escalation (Owner & Contractor)	
8	Burdens	
9	Subtotal- Transmission	\$2,017
10	Generation	
11	EPC	
12	EPC Base Scope	
13	EPC Incremental Schedule Shift	
14	DCP's / Current CO's	

REDACTED

April 23, 2010 Levy Nuclear Project

15	EPC Contract Contingency			
16	Estimated EPC Escalation			
17	Subtotal EPC			
18	Owner Managed Scope			
19	COLA (Labor & Contingency in Owner Labor & Contingency line items.)			
20	Owner Managed Scope			
21	Owner Labor & Staff Augmentation			
22	Perm Plant Equip (Spares, Maintenance Equip etc.)			
23	Real Estate			
24	Other Owner Indirects (Fees, Permits, Taxes, Warranty, Ins, Temp Facilities, etc.)			
25	Subtotal Owner Managed Scope			\$1,460
26	Other			
27	Owner Escalation			
28	Owner Contingency			
29	Burdens			
30	Subtotal- Other			
31	Total w/o Fuel			
32	Fuel			
33	Fuel			
34	Total with Fuel			

Key assumptions of the estimate include:

1. Class 5 / Class 4 estimate according to Association for the Advancement of Cost Estimating International (AACEI) Guidelines
2. In-service dates are: Unit 1 Jun-21, U2 Dec-22
3. General terms of the existing EPC contract were maintained
4. Estimate excludes AFUDC
5. Estimate includes estimated escalation dollars through in-service dates
6. Assumed partial suspension through COL (Q4-2012)
7. Allowances were estimated for incremental costs associated with partial suspension

Existing EPC terms and conditions apply to elements of the EPC contract

[REDACTED]

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- Transmission estimate is based on route studies and system needs completed during 2006-2008
- Transmission contingency and escalation estimates were adjusted to account for the schedule shift

The last approved estimate presented in the combined 2008 IPP was [REDACTED] excluding AFUDC. Primary differences between the March 2010 approved estimate and the 2008 IPP are:

Major Areas of Change from IPP to Current Estimate (excluding AFUDC)
(\$'s millions)

Description	Delta	Notes
[REDACTED]		

The estimate has been provided to PEF System Planning for further analysis and modeling in order to re-assess the Nuclear Cost Recovery feasibility. This analysis is required for annual filings to the Florida Public Service Commission (FL PSC). Preliminary scenario sensitivities on rough order of magnitude (ROM) costs provided in January indicate continued feasibility for the project. The analysis was based on both quantitative and qualitative factors, including but not limited to:

- Total project cost, including capital expenditures, anticipated O&M and fuel
- Customer price impact and acceptance
- Carbon reduction
- Fuel diversity
- PEF baseload energy needs
- Technical and regulatory feasibility

The approved estimate included in this IPP is less than earlier ROM inputs to feasibility scenarios.

The current 3-year plan for spending under the partial suspension is included in the table below, stated in millions of dollars:

Continue w/ EPC Amendment	PTD	2010 - 12			3-Yr Total
		2010	2011	2012	
EPC Payments	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
LLM Payments & WEC Support	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
LLM PO Disposition	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Transmission	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COLA	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Wetland mitigation	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Other Owner's Cost	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

April 28, 2010 Levy Nuclear Project

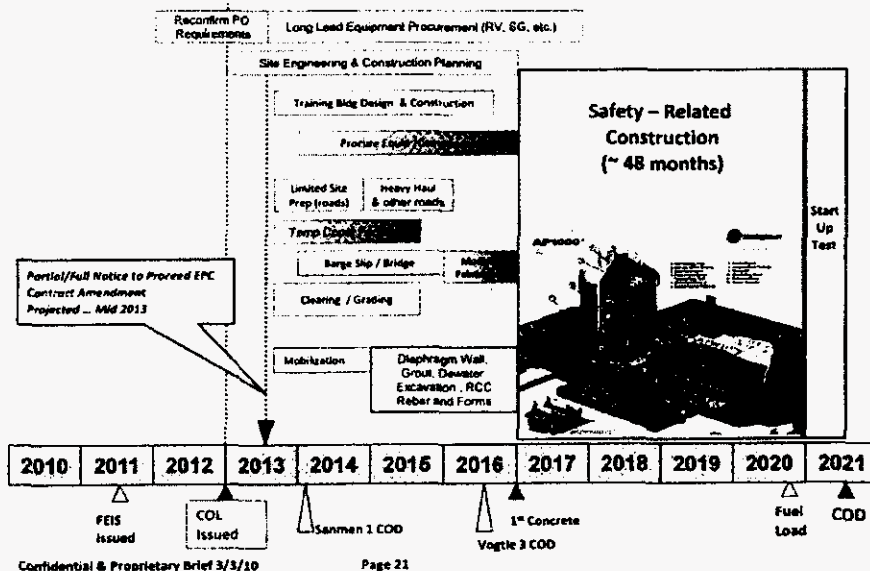
The above costs do not include AFUDC, which is being calculated by PEF Regulatory Planning. These amounts include estimated [REDACTED] purchase order disposition with WEC. Although the timing and nature of the LLM costs have not been negotiated with WEC, PEF's required FL PSC regulatory filing on April 30, 2010 includes a [REDACTED] estimate for these costs.

Through the December 2009 Interim IPP, Senior Management approved the Project Team's first quarter 2010 spending of [REDACTED] during the EPC negotiation period.

4. SCHEDULE UPDATE

The Project Team has developed a scenario for the estimate which meets the objective of moving significant costs and risk past the receipt of the COL. The COL is currently expected to be received in late 2012. The estimate is based on in-service date for Unit 1 of June 2021, with Unit 2 following eighteen months later.

The illustration below highlights key schedule milestones for generation:



Mitigation

1. Ensure close engagement with environmental agencies to determine diverse mitigation strategies for wetlands
2. [REDACTED]
3. Conduct community outreach planning, land procurement strategy and permitting plan
4. Work with local officials to facilitate timely administrative hearings

Complex RAIs could impact NRC review schedule (NRC Licensing Risk)

If RAI response requires data gathering, modeling or significant analysis then more time may be required than the response time assumed in the NRC review schedule which may result in FEIS, FSEIR and COL schedule delay.

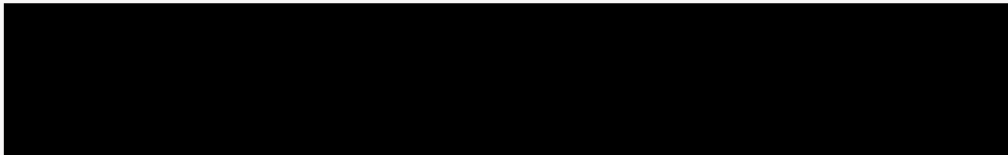
Mitigation

Although NRC has completed RAI phase of review, additional questions may be received to obtain information needed to support completion of the FEIS and FSEIR. The following mitigation actions remain:

1. Establish and track interim milestones for completion of each RAI response.
2. Discuss with NRC promptly any RAI response which is anticipated to exceed the expected response time.
3. Review RAI response development status at least weekly with assigned personnel
4. For complex RAIs, such as the recently received RAIs related to seismic/structural, develop a response plan and review with NRC to ensure information needs will be met.

Material and labor escalation exceeds estimated numbers





Contested Hearings could impact schedule (NRC Licensing Risk)

Two contentions that were admitted must be resolved in a contested hearing. If contested and mandatory hearings are not completed as planned there would be delays in the COL approval process.

Mitigation

1. Complete and deploy effective communication plan for key milestone events
2. Develop focused outreach, communication with key stakeholders
3. Ensure communications are transparent and open with consistent messaging
4. Engage subject matter experts with legal representatives in preparing for contested and mandatory hearings.
5. Work with ASLB, NRC staff and intervenors to establish efficient schedule for conduct of hearings. Conduct of contested and mandatory hearings in parallel is desired to minimize delay in COL approval.

Westinghouse Response to NRC Review Issues for AP1000 DCD Certification (NRC Licensing Risk)

Westinghouse was notified by the NRC in mid-October 2009 that additional work was required on the testing for aircraft crash on the shield building. Other design issues are also under review.

If Westinghouse is unable to obtain timely AP1000 DCD certification, then the overall schedule for the plant could be in jeopardy.

Mitigation

1. The Company has allowed adequate contingency in the schedule by initiating partial suspension with the EPC
2. Assign appropriate subject matter experts and collaborate with Nustart and AP1000 utilities to ensure appropriate action is taken.
3. Actively support the AP1000 Licensing Finalization team and interface with NRC to develop efficient sequence to complete DCD and RCOLA review and approval.

Resolution of Least Environmentally Damaging Practicable Alternatives (LEDPA) analysis for US Army Corps of Engineers (USACE) and EPA.

USACE has questions regarding the LEDPA analysis. If the USACE/EPA questions regarding the LEDPA cannot be resolved in a reasonable time, then the FEIS and 404 permit schedules could be impacted.

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The second CPVRR results summary table below provides the sensitivities surrounding capital cost forecasts and carbon policy scenarios. In these sensitivities, the initial capital costs of the LNP and the competing alternatives are adjusted in a range of (-15%) to (+25%) to assess the relative impacts on life cycle cost effectiveness comparisons between the plans. The carbon policy sensitivities are the same.

PEF Summary CPVRR Review for 2010 NCRC Filing

April'10 NCRC CPVRR Economic Results Summary Table						
CapEx Sensitivities						
<i>Mid Fuel Reference Case</i>	LNP CapEx (15%)	LNP CapEx (5%)	Mid Fuel Reference	LNP CapEx +5%	LNP CapEx +15%	LNP CapEx +25%
NCRC APR'10: 100% Ownership, 2021 CDD Levy Case Versus All Gas CPVRR \$Million, 6.75% Discount Rate						
No CO ₂	\$2,520	\$1,490	\$975	\$460	(\$570)	(\$1,600)
EPA WM CO ₂	\$6,337	\$5,307	\$4,792	\$4,277	\$3,247	\$2,218
CRA WM CO ₂	\$8,746	\$7,716	\$7,201	\$6,686	\$5,656	\$4,626
EPRI Full CO ₂	\$11,214	\$10,184	\$9,669	\$9,154	\$8,124	\$7,094
EPRI Ltd CO ₂	\$16,293	\$15,263	\$14,748	\$14,234	\$13,204	\$12,174
NCRC APR'10: 50% Ownership, 2021 CDD Levy Case Versus All Gas CPVRR \$Million, 6.75% Discount Rate						
No CO ₂	\$557	\$44	(\$213)	(\$469)	(\$982)	(\$1,495)
EPA WM CO ₂	\$2,402	\$1,889	\$1,633	\$1,376	\$863	\$350
CRA WM CO ₂	\$3,571	\$3,058	\$2,801	\$2,544	\$2,031	\$1,518
EPRI Full CO ₂	\$4,805	\$4,292	\$4,036	\$3,779	\$3,266	\$2,753
EPRI Ltd CO ₂	\$7,375	\$6,862	\$6,605	\$6,349	\$5,836	\$5,323

Given the range of forecast assumptions, the results of the updated CPVRR assessment indicate that the plan including the LNP is favorable in more cases than not. This is one of many indicators that have been reviewed in considering the ongoing feasibility of the project. Based on the information presented above, and other qualitative factors set forth in PEF's April 30 NCRC filing, LNP continues to be a viable generation option with the revised estimate.

7. CONTRACT UPDATE

SUMMARY OF EPC AGREEMENT CHANGES

Description	Date	Key provisions
Amendment 1	29-Dec-2009	• [REDACTED]
		• [REDACTED]
Amendment 2	5-Mar-2010	• [REDACTED]
Amendment 3	25-Mar-2010	• [REDACTED]

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SUMMARY OF JVT CONTRACT CHANGES

Description	Date	Key provisions
SCA Conditions of Certification Amendment #3	29-Mar-2010	• •
Levy COLA Phase II RAI's Amendment # 4	24-Mar-2010	• •
Pending Levy COLA Phase II RAI's Amendment # 5	Expected May 2010	• • •
Pending Work Authorization LNP Roller Compacted Concrete (RCC) Mix Design & Specialty Test Plan	Expected April - May 2010	• • • • •
Pending Work Authorization LNP COLA Revision #2	Expected April 2010	• • • • • •

SUMMARY OF FUELS AGREEMENT CHANGES

Description	Date	Key provisions
Amendment 1	29-Dec-2009	
Amendment 2	5-Mar-2010	
Amendment 3	19-Mar-2010	

8. REGULATORY

April 29, 2010 Levy Nuclear Project

The Project Team has worked with Regulatory Planning and PEF legal counsel during late 2009 through the current date to ensure all key regulatory milestones are met. The following items are complete through the first quarter of 2010:

- 2009 Cost true-up filings and associated testimony to support 2009 costs
- Initial Production of Documents and Interrogatory responses by FL PSC and the Office of Public Counsel
- Initial meeting with FL PSC audit staff for assessment of internal controls

Key regulatory milestones over the next 60 days include April 30 filings for cost projections and feasibility, associated testimony and response to ongoing data requests as we prepare for Nuclear Cost Recovery hearings scheduled for late August 2010.

9. RECOMMENDATION

Consistent with Senior Management and Board decisions, the Project Team recommends continued funding of the Levy Project in the amounts set forth below through 2012. This funding will allow the Company to preserve the long-term benefits of nuclear generation – improved fuel portfolio diversity, reduced reliance on fossil fuels, carbon free energy generation, and base load capacity at a low cost fuel source. It will also allow for the deferral of significant capital investment until after the COL is obtained, which will benefit PEF's customers by reducing the near-term project costs during the immediate recessionary period. It also benefits the Company by deferring capital expenditures to a later time period when the Company may benefit from, among other things, additional certainty with respect to federal and state energy policy, plant licensing, and improved economic and financial conditions.

The Project Team recommends a

March 29, 2011 Levy Nuclear Project

1. EXECUTIVE SUMMARY

OVERVIEW

The scope of the Levy Nuclear Project (LNP) includes two (2) 1,105-MWe AP1000™ reactors, the combined operating license (COL) and related transmission additions/upgrades. The COL is anticipated to be received in mid-2013, supporting Unit 1's commercial operation date scheduled for mid-2021 and Unit 2 eighteen months later. As of the last transmission study, the transmission requirements include two (2) new 500/230kV substations, approximately 91 miles of 500 kV and 88 miles of 230kV transmission lines, upgrades to five (5) transmission substations and two (2) new distribution substations, as well as certain low-voltage line upgrades to accommodate the added nuclear generation.

Since the previous IPP update April 28, 2010, no significant changes in project scope have occurred. With regard to the transmission portion of the project, additional system planning studies are expected to begin in October 2011 and be completed by 2012. As a result of the transmission study, the project team anticipates the transmission scope associated with the Levy project may be reduced based upon the shift in the commercial operation date; however, PEF will not know the actual impact to the transmission scope until the updated transmission study is completed, the results are analyzed, and the project work scope based on the study is defined and estimated.

In November 2010, the NRC provided an updated review schedule for the Levy COLA and it is now anticipated to be completed by mid-2013, with no anticipated impact to the overall project schedule. No other significant schedule changes within the project have occurred since the previous IPP.

There has been no change to the overall project cost estimate which includes costs associated with long-lead equipment (LLE) purchase order (PO) disposition.

PEF anticipates completion of the annual feasibility analysis in advance of the May 1 regulatory filing, and as of the date of this IPP, directional guidance based on 2010 results indicates that the Levy project remains favorable in more cases than not.

RECOMMENDATION

The project team recommends continued funding of approximately [REDACTED] through mid-2012. The anticipated 3-year spend (2011-2013) is approximately [REDACTED] including the LLE PO disposition costs, some of which continue to be under negotiation with Westinghouse Electric Company (WEC). The project team will return in mid-2012 with an update and any needed funding requests.

This funding will allow the Company to preserve the long-term benefits of nuclear generation – improved fuel portfolio diversity, reduced reliance on fossil fuels, carbon free energy generation, and base load capacity at a low cost fuel source. It will also allow for the continued deferral of significant capital investment until after the COL is obtained, which will benefit PEF's customers by

March 29, 2011 Levy Nuclear Project

continuing to maintain lower near-term project costs during the continuing recessionary period. It also benefits the Company by deferring capital expenditures to a later time period when the Company may benefit from, among other things, additional certainty with respect to federal and state energy policy, plant licensing, and improved economic and financial conditions.

2. SCOPE UPDATE

When completed, the Levy project will add approximately 1,105 MWe of electrical generating resources to the PEF system in the summer of 2021, and 1,105 MWe of electrical generating resources to its system eighteen months later, with two state-of-the-art Westinghouse AP1000™ Advanced Passive nuclear power plants in Levy County, Florida. Additional transmission will also be constructed to support the addition of the Levy Plant.

There have been no significant changes in scope for the COLA or Generation portions of the project and PEF continues to review the impact of the schedule shift on the transmission portion of the LNP. Most of the transmission activities will be deferred past receipt of the COL and will be rescheduled based on projected in-service dates for the Levy Plants scheduled for mid-2021 and Unit 2 eighteen months later. Additional system planning studies that may impact overall Levy Transmission project scope are expected to begin in October 2011 and be completed by 2012. PEF will not know the impact to the transmission scope until the updated transmission study is completed, the results are analyzed, and the project work scope based on the study is defined and estimated.

3. COST UPDATE

An updated construction and milestone payment schedule will be negotiated with the Consortium nearer to receipt of the LNP COL when pre-license risks are mitigated. The project team has completed a true-up of the 2010 baseline estimate to reflect actual 2010 costs and completed LLE changes for certain equipment. Based upon this true-up, the project team has no change to the overall expected cost of the Levy Project, and maintains the estimate approved in 2010. This estimate continues to assume Unit 1 goes in-service mid-2021 and Unit 2 in-service eighteen months later. The table below provides the key components of the estimate (\$ in millions):

#	Description	PTD Actual (Feb 2011)	Est. to Complete	Est. at Completion
1	Transmission			
2	T-Lines			
3	Substations			
4	Real Estate			
5	PE Indirects / Staffing			
6	Owner Contingency			
7	Escalation (Owner & Contractor)			

March 29, 2011 Levy Nuclear Project

#	Description	PTD Actual (Feb 2011)	Est. to Complete	Est. at Completion
8	Financial Burdens			
9	Subtotal- Transmission			
10				
11	Generation			
12	EPC			
13	EPC Base Scope			
14	EPC Inc. Schedule Shift			
15	Design Change Proposals (DCPs) / Current Change Orders (COs)			
16	EPC Contract Contingency			
17	Estimated EPC Escalation			
18	Subtotal EPC			
19				
20	Owner Managed Scope			
21	COLA (Labor & Contingency in Owner Labor & Contingency line items.)			
22	Owner Managed Scope			
23	Owner Labor & Staff Augmentation			
24	Perm Plant Equip (Spares, Maintenance Equip etc.)			
25	Real Estate			
26	Other Owner Indirects (Fees, Permits, Taxes, Warranty, Ins, Temp Facilities, etc.)			
27	Subtotal Owner Managed Scope			
28				
29	Other			
30	Owner Escalation			
31	Owner Contingency			
32	Financial Burdens			
33	Subtotal- Other			
34				
35	Total w/o Fuel			
36				
37	Fuel			
38	Fuel			
39	Total with Fuel			\$17,635

Key assumptions of the estimate include:

1. Class 5 / Class 4 estimate according to Association for the Advancement of Cost Estimating International (AACEI) Guidelines
2. In-service dates are: Unit 1 Jun-21, U2 Dec-22
3. General terms of the existing EPC contract were maintained
4. Estimate excludes AFUDC
5. Estimate includes estimated escalation dollars through in-service dates
6. Assumed partial suspension through COL (mid-2013)
7. Allowances were estimated for incremental costs associated with partial suspension

Existing EPC terms and conditions apply to elements of the EPC contract

- Owner's cost are based on assumed staffing curves derived from project team's best available forecasts
- Transmission estimate is based on route studies and system needs completed during 2006-2008. The shift in the project schedule and changes in the state-wide transmission system will necessitate a review of the existing Transmission Study based on the projected in-service dates.

The current 3-year plan for spending under the partial suspension is included in the table below, stated in millions of dollars:

Estimate of Near-Term Costs	PTD	Forecast			2011-13
	2010	2011	2012	2013	3-Yr Total
EPC Payments					
LLE Payments & WEC Support					
LLE PO Disposition Costs					
Transmission					
COLA					
Wetland mitigation					
Other Owner's Cost					
Totals					

The most recent long-range capital plan provided to PEF in October 2010 contained cash flows of [REDACTED] respectively for years 2011 through 2013. Increases from that October 2010 plan to the current estimated amounts presented above are comprised of LLE PO disposition costs as well as additional costs for owner managed scope (AP1000™ Design Change Proposals (DCPs), permits, taxes, warranties, insurance, etc.), ramp-up of PGN labor, Transmission strategic right-of-way land acquisition, wetland mitigation, and contract design/engineering.

March 29, 2011 Levy Nuclear Project

Due to the relatively small values for net AFUDC and the minor changes in the anticipated 2011 to 2013 costs, net AFUDC has not been re-estimated based on the amounts presented in the table above.

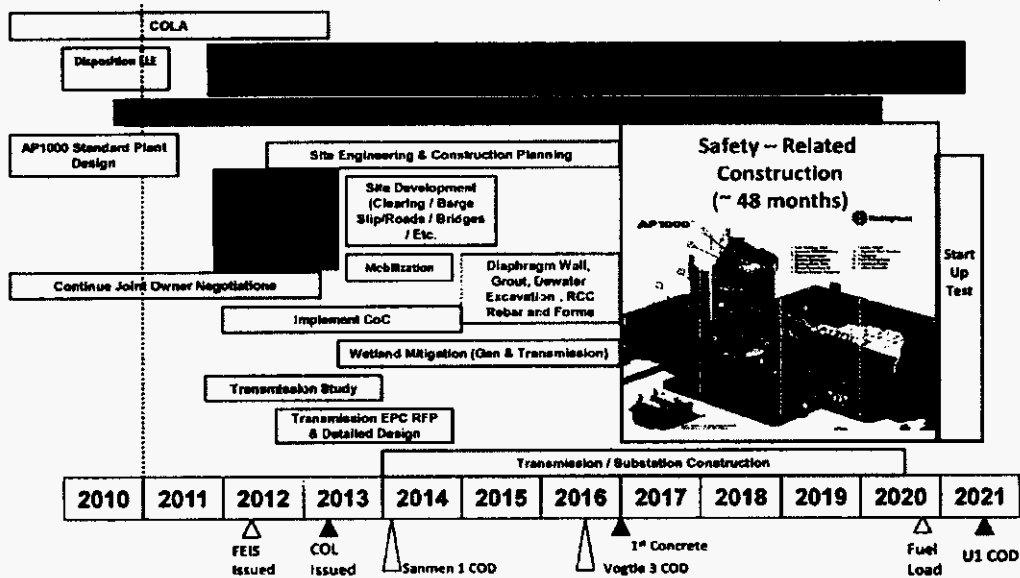
As noted, the above table includes estimated one-time costs which may arise as part of LLE PO disposition with WEC. Although the timing and nature of the LLE costs have not been fully negotiated with WEC, the project team currently estimates this figure at no greater than [REDACTED] for 2011. In the May 2010 NCRC regulatory filing, the project team included an estimate of [REDACTED] for these costs; the reduction in estimated one-time disposition costs is primarily related to ongoing successful negotiation with WEC regarding suspension opportunities for certain LLE.

2010 actual costs were [REDACTED] compared to [REDACTED] approved by SMC at the April 2010 IPP. The difference is primarily attributable to lower than expected LLE PO disposition costs as noted above.

4. SCHEDULE UPDATE

The project team is implementing the previously approved schedule shift in an effort to meet the objective of moving significant costs and risk past the receipt of the COL. The COL is currently expected to be received in mid-2013. The scheduled commercial operation date for Unit 1 is June 2021 with Unit 2 following eighteen months later.

The illustration below is an executive summary schedule that includes key schedule activities for the project. Activities that will take place in 2011 are highlighted in yellow.



March 29, 2011 Levy Nuclear Project

Key Project Work Planned for 2011 and First Half of 2012

#	Description	Planned Date
1		
2	Complete the Site Certification Conditions of Certification (CoC) schedule	Apr-11
3	Complete the Roller Compacted Concrete (RCC) Mix Design Program	May-11
4	Complete the RCC Specialty Testing Program	May-11
5		
6	Submit Revision 3 to the Levy COLA to incorporate revisions based on the approved AP1000™ DCD revision	Oct-11
7	Start review of existing transmission study	Oct-11
8		
9		
10		
11	Receive FEIS	Apr-12
12	Receive FSER	Apr-12
13	Start mandatory and contested hearings	May-12
14		
15	Receive 404 permit	Jul-12

In addition, the following ongoing activities will continue in the timeframe noted above:

- Work with the NRC and Westinghouse to resolve outstanding issues and obtain approval for the AP1000™ DCD revision
- Continue to provide responses to NRC RAIs pertaining to the Levy COLA and Environmental Report
- Perform a benchmarking of Licensing activities with Southern Company's Vogtle Units 3 & 4 and continue to monitor Licensing activities at SCANA's V. C. Summer Units 2 & 3
- Continue engineering support of NuStart Standard Plant Design Finalization
- Support NRC Advisory Committee on Reactor Safeguards (ACRS) meetings/presentations
- Continue engineering support of joint AP1000™ Owners Group's (APOG) efforts in Engineering Program development
- Develop/refine detail schedule segments for near-term work
- Continue strategic land acquisition for the transmission lines during partial suspension period

March 29, 2011 Levy Nuclear Project

Quantification of Risk – COLA:

Marker	Short Name	EMV
1	Changes to security rules may delay NRC review and require design changes in physical plant arrangement	
2	Complex RAI- Probable Maximum Tsunami	
3	Complex RAI- Seismic/Structural	
4	Contested hearings could impact schedule	
5	Failure to control Design Changes impacting license	
6	Lack of public acceptance influences decision-makers	
7	Lack of understanding of the permitting process and ineffective scheduling	
8	QA program implementation	
9	Resolution of LEDPA analysis for USACE could delay licensing proceedings	
Total Risk Exposure - All Risks (\$M)		

Discussion of "yellow" and "red" risk items from the COLA risk matrix are provided below; please see the Appendix for discussion of remaining risks.

9. Resolution of LEDPA analysis for USACE could delay licensing proceedings

Impact to:

Cost	<input checked="" type="checkbox"/>	Schedule	<input checked="" type="checkbox"/>	Performance	n/a	Environmental	n/a	Safety	n/a
------	-------------------------------------	----------	-------------------------------------	-------------	-----	---------------	-----	--------	-----

Risk: USACE has questions regarding the LEDPA analysis. If the USACE/EPA questions regarding the LEDPA cannot be resolved in a reasonable time, then the FEIS and 404 permit schedules could be impacted.

Trend: Previous IPP: Probability = Moderate, Impact = Significant
 Current IPP: Probability = Very Low, Impact = Critical

Response/Plan: The project team will provide detailed analysis to USACE that clearly shows that Levy is the LEDPA site. The project team will also establish routine meetings with USACE to identify concerns, significant challenges and open items.

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5.1.2 Top Tier Project Risks -- Non-COLA Near Term:

The following risk matrix includes the top twelve non-COLA "near term" project risks (risks prior to issuance of the Full Notice to Proceed (FNTP)):

2. LLE Negotiations - [REDACTED]
3. LLE Negotiations - [REDACTED]
4. [REDACTED]
5. Potential changes to transmission scope
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
10. Changes in timing and scope of Crystal River switchyard work
11. [REDACTED]
12. Recruiting nuclear operators
13. Land acquisition to support transmission, pipeline routing and wetland mitigation
14. Recruiting project staffing and project controls refinement

Probability		Impact				
		Minimal	Moderate	Significant	Severe	Critical
		<\$20M	<\$50M	<\$100M	<\$150M	>\$150M
Very High [90-100%]						
High [66-89%]						
Moderate [34-65%]						
Low [11-33%]						4,
Very Low [0-10%]						

*Note: Impact ranges are based on ERM-SUBS-00021 [Enterprise Risk Management Standard]

March 29, 2011 Levy Nuclear Project

Quantification of Risk – Non-COLA Near Term:

Marker	Short Name	EMV
2	LLE Negotiations-	[REDACTED]
3	LLE Negotiations-	
4	[REDACTED]	
6	[REDACTED]	
7	[REDACTED]	
8	[REDACTED]	
10	Changes in timing and scope of Crystal River switchyard work	
11	[REDACTED]	
12	Recruiting nuclear operators	
13	Land acquisition required to support transmission, pipeline routing and wetland mitigation	
14	Recruiting project staffing and project controls refinement	
Total Risk Exposure - All Risks [\$M]		

The following item from the risk matrix is presented separately as an opportunity as it relates to a potential reduction in scope and overall project cost:

Marker	Short Name	EMV
5	Potential changes to transmission scope	[REDACTED]

Discussion of "yellow" and "red" risk items from the Non-COLA Near Term risk matrix are provided below; please see the Appendix for discussion of remaining risks.

4. [REDACTED]

Impact to:

Cost	<input checked="" type="checkbox"/>	Schedule	<input checked="" type="checkbox"/>	Performance	n/a	Environmental	n/a	Safety	n/a
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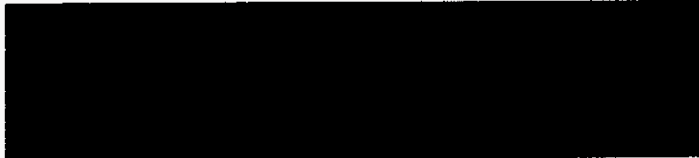
Risk:

[REDACTED]

March 29, 2011 Levy Nuclear Project

Trend: Previous IPP: New Risk
Current IPP: Probability = Low, Impact = Critical

Response/Plan:



6.



Impact to:

Cost	<input checked="" type="checkbox"/>	Schedule	n/a	Performance	n/a	Environmental	n/a	Safety	n/a
------	-------------------------------------	----------	-----	-------------	-----	---------------	-----	--------	-----

Risk:



Trend: Previous IPP: New Risk
Current IPP: Probability = Moderate, Impact = Critical

Response/Plan:



5.2 Enterprise Risk Summary

In addition to the project-specific risks previously discussed, there are a number of enterprise risks that are generally outside the control of the Company and can affect the Company's ability to proceed with the LNP project.

These enterprise risks are constantly monitored as part of the LNP risk management and include economic conditions in Florida; economic conditions for the Company including capital market reactions; load growth impacts; customer rates for nuclear generation; continued state legislative support for nuclear generation; state energy efficiency policy and regulation; state energy and environmental policy and regulation; federal energy and environmental policy and regulation; and federal support for nuclear generation.

March 29, 2011 Levy Nuclear Project

7. CONTRACT UPDATE

The table below identifies the major contracts that have been issued by PEF for the Levy Project. PEF has contracted with the Joint Venture Team (JVT) of Sargent & Lundy, CH2M Hill, and WorleyParsons for preparation and support of the COLA and SCA. PEF has contracted with a Consortium comprised of Westinghouse Electric Company and Stone & Webster for the engineering and procurement of plant equipment (including the nuclear island and balance-of-plant equipment) as well as for the construction of the plant. Finally, PEF has contracted with WEC for the fabrication of the initial core load of nuclear fuel.

Levy Major Contract Portfolio (\$ in millions)

Contractor Name	Contract Type	2010 IPP Value	Current Value (Notes 2, 3)
EPC Consortium (Westinghouse Electric Company, Stone & Webster Inc.)	Various (Note 1)		
Westinghouse Electric Company – Nuclear Fuel Initial Core Load	Firm		
Joint Venture Team (Sargent & Lundy, CH2M Hill, WorleyParsons)	T&M		

Note 1 – [REDACTED]

Note 2 – [REDACTED]

Note 3 – [REDACTED]

EPC Consortium increase from 2010 IPP:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

JVT increase from 2010 IPP:

- Additional NRC RAI Support
- Offset Boring Program
- Roller Compacted Concrete (RCC) and bedding mix design
- RCC specialty testing
- Foundation design calculation revisions

March 29, 2011 Levy Nuclear Project

7.1 LONG LEAD EQUIPMENT UPDATE

The timeline below includes key activities for LLE disposition.

Key Points:



Long Lead Equipment Summary:

- June 2010 – LLE PO disposition evaluation was completed. (Results of the LLE evaluation showed [REDACTED])
- July 2010 – Project team began working with Consortium and LLE vendors to negotiate selected disposition
- September 2010 - Consortium receives preliminary LLE continue/suspension terms from vendors
- February 1, 2011 – Consortium provided final information package [REDACTED]
- Targeting completion of LLE negotiations by April 2011

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Long Lead Equipment Status by Component (as of 3/18/2011):

Equipment	June 2010 Recommendation	Current Disposition (as of 3/18/2011)	Notes
[REDACTED]			

8. REGULATORY

Updates to the COL schedule and status are discussed in detail in Sections 2 and 4 of this IPP. The COL is expected to be issued by the NRC early to mid-2013.

In addition to the COL, PEF must obtain required environmental permits to support LNP plant construction and operation. Environmental permitting for the LNP involves certain basic steps: first, an application to the NRC for a COL; second, an application to the State of Florida for site certification; and third, applications for certain additional federal environmental permits, including the following:

- National Pollutant Discharge Elimination Permit for water discharge
- Prevention of Significant Deterioration air permit
- 316(b) demonstration for the proposed cooling water intake
- U.S. Army Corps of Engineers Section 404 and Section 10 permits to construct structures in wetlands and regulated waterways
- Hazardous waste management and disposal
- Determination of consistency under the requirements of the Coastal Zone Management Act to ensure the LNP is consistent with existing federal and state coastal zone management plans.

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Trend: Previous IPP: New Risk
Current IPP: Probability = Very Low, Impact = Minimal

Response/Plan: The project team will establish a team to review processes required at COL and procedures associated with those required processes.

Discussion of "green" risk items from the Non-COLA Near Term risk matrix:

2. LLE Negotiations

Impact to:

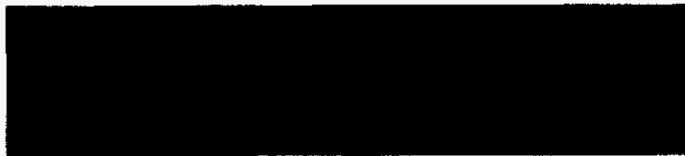
Cost	<input checked="" type="checkbox"/>	Schedule	<input checked="" type="checkbox"/>	Performance	n/a	Environmental	n/a	Safety	n/a
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Risk:



Trend: Previous IPP: New Risk
Current IPP: Probability = Moderate, Impact = Minimal

Response/Plan:

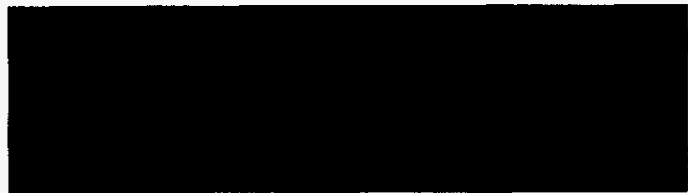


3. LLE Negotiations

Impact to:

Cost	<input checked="" type="checkbox"/>	Schedule	<input checked="" type="checkbox"/>	Performance	n/a	Environmental	n/a	Safety	n/a
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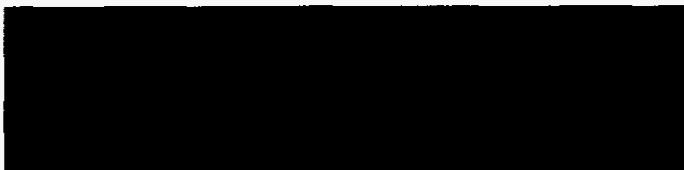
Risk:



March 29, 2011 Levy Nuclear Project

Trend: Previous IPP: New Risk
Current IPP: Probability = Moderate, Impact = Minimal

Response/Plan:



5. Potential changes to transmission scope

Impact to:

Cost	<input checked="" type="checkbox"/>	Schedule	<input checked="" type="checkbox"/>	Performance	n/a	Environmental	n/a	Safety	n/a
------	-------------------------------------	----------	-------------------------------------	-------------	-----	---------------	-----	--------	-----

Risk: If the revised transmission study or other transmission system analysis changes the scope of work, then both cost and schedule may be impacted.

Trend: Previous IPP: New Risk
Current IPP: Probability = Moderate, Impact = Minimal

Response/Plan:

PEF has outlined a timeline to do a transmission study that will confirm the transmission scope of work. Following the study, PEF will assess the impacts and adjust the scope accordingly. PEF is focusing its land acquisition efforts on the common corridor.

7. 

Impact to:

Cost	<input checked="" type="checkbox"/>	Schedule	<input checked="" type="checkbox"/>	Performance	n/a	Environmental	n/a	Safety	n/a
------	-------------------------------------	----------	-------------------------------------	-------------	-----	---------------	-----	--------	-----

Risk:



March 29, 2011 Levy Nuclear Project

Trend: Previous IPP: New Risk
Current IPP: Probability = Very Low, Impact = Significant

Response/Plan:

[Redacted]

8.

Impact to:

Cost	<input checked="" type="checkbox"/>	Schedule	n/a	Performance	n/a	Environmental	n/a	Safety	n/a
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Risk:

[Redacted]

Trend: Previous IPP: New Risk
Current IPP: Probability = Moderate, Impact = Moderate

Response/Plan:

[Redacted]

10. Change in timing and scope of Crystal River switchyard work

Impact to:

Cost	<input checked="" type="checkbox"/>	Schedule	<input checked="" type="checkbox"/>	Performance	n/a	Environmental	n/a	Safety	n/a
------	-------------------------------------	----------	-------------------------------------	-------------	-----	---------------	-----	--------	-----

Risk: If the revised transmission study or other transmission system analysis changes requires additional work to be done at the Crystal River switchyard, then there is an increased potential that this will adversely affect the cost and schedule of this work.

Trend: Previous IPP: New Risk
Current IPP: Probability = Low, Impact = Moderate

Response/Plan:

PEF plans to re-conduct a transmission study that will confirm the transmission scope. Following the study, the project team will inform management of any changes and will adjust the plan accordingly.

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11. [REDACTED]

Impact to:

Cost	<input checked="" type="checkbox"/>	Schedule	<input checked="" type="checkbox"/>	Performance	n/a	Environmental	n/a	Safety	n/a
------	-------------------------------------	----------	-------------------------------------	-------------	-----	---------------	-----	--------	-----

Risk:



Trend:

Previous IPP: New Risk
Current IPP: Probability = Low, Impact = Significant

Response/Plan:



12. Recruiting nuclear operators

Impact to:

Cost	<input checked="" type="checkbox"/>	Schedule	<input checked="" type="checkbox"/>	Performance	n/a	Environmental	n/a	Safety	n/a
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Risk:

If PEF is unable to attract the necessary number of nuclear operators to support startup, commissioning and operations, then PEF may need to train a higher percentage of new reactor operators than planned which potentially could affect the project cost and schedule.

Trend:

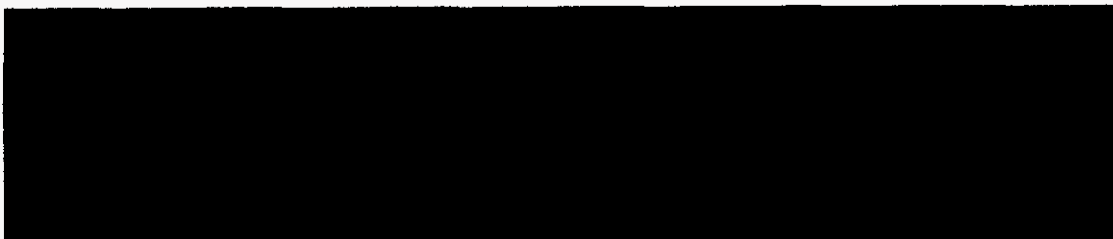
Previous IPP: New Risk
Current IPP: Probability = Very Low, Impact = Minimal

Response/Plan:

The project team will develop a staffing and recruiting plan to support the project.

Recommendation

1. Continuation of the extended power uprate project to obtain the 180 MWe to offset new plant construction cost with the approval of the new projected date for the implementation in 2012.



2. Scope

In order to support EPU Steam Cycle Efficiency Improvements the following Modifications have been implemented during the 2009 16R Refueling. This outage affords the advantage of a longer than normal refueling outage because of steam generator replacement.

- 16R Refueling Outage 2009 BOP Efficiencies
 - Turbine Generator (915 MWe)
 - Generator stator winding and Core Iron replacement (63 days)
 - Generator rotor replacement
 - Exciter replacement
 - (2) Turbine generator lubricating oil cooler tube bundle replacements
 - (4) Moisture separator reheater replacements
 - (2) Condensate heat exchanger replacements
 - (8) Heater Drain Valves and piping segment replacements
 - (2) Secondary cooling heat exchanger, pump impeller and motor replacements
 - (2) Moisture separator reheater "Belly Drain" heat exchanger additions
 - Iso-phase bus duct cooler and fan housing replacement
 - ICS updates
 - Plant Process Computer (PPCS) modifications
 - Replace the turbine by-pass valves and mufflers
 - (2) Atmospheric Dump Valve replacement
- 17R Power Uprate 2012, (RX + 15.5%,TG 1080MWe)
 - (2) Low Pressure Turbine replacements
 - High Pressure Turbine replacement
 - ICS updates and Safety System Modifications
 - De-aerator Bypass line
 - (2) Booster Feed Pumps Impellers and Motor replacements
 - (2) Main Feed Pump Impellers and Turbine Horse Power Rerate

4. Estimated Project Cost

Estimated Capital Cost

Project Costs	Project to Date Through Mar 2010	Remaining Cost	Total Project
Direct Cost	\$ 233,616,423	\$ 214,157,758	\$ 447,774,181
Total Burdens & Allocations	\$ 15,567,466	\$ 16,084,736	\$ 31,652,202
Financial View Total	\$ 249,183,890	\$ 230,242,494	\$ 479,426,384
AFUDC	\$ 18,463,879	\$ 14,846,234	\$ 33,310,113
Total Project Cost (Gross Joint Owner)	\$ 267,647,769	\$ 245,088,728	\$ 512,736,497
Joint Owner Contributions	\$ (19,131,610)	\$ (12,124,450)	\$ (31,256,062)
Total Financial View - Including AFUDC and Net of Joint Owner	\$ 248,516,158	\$ 232,964,276	\$ 481,480,435

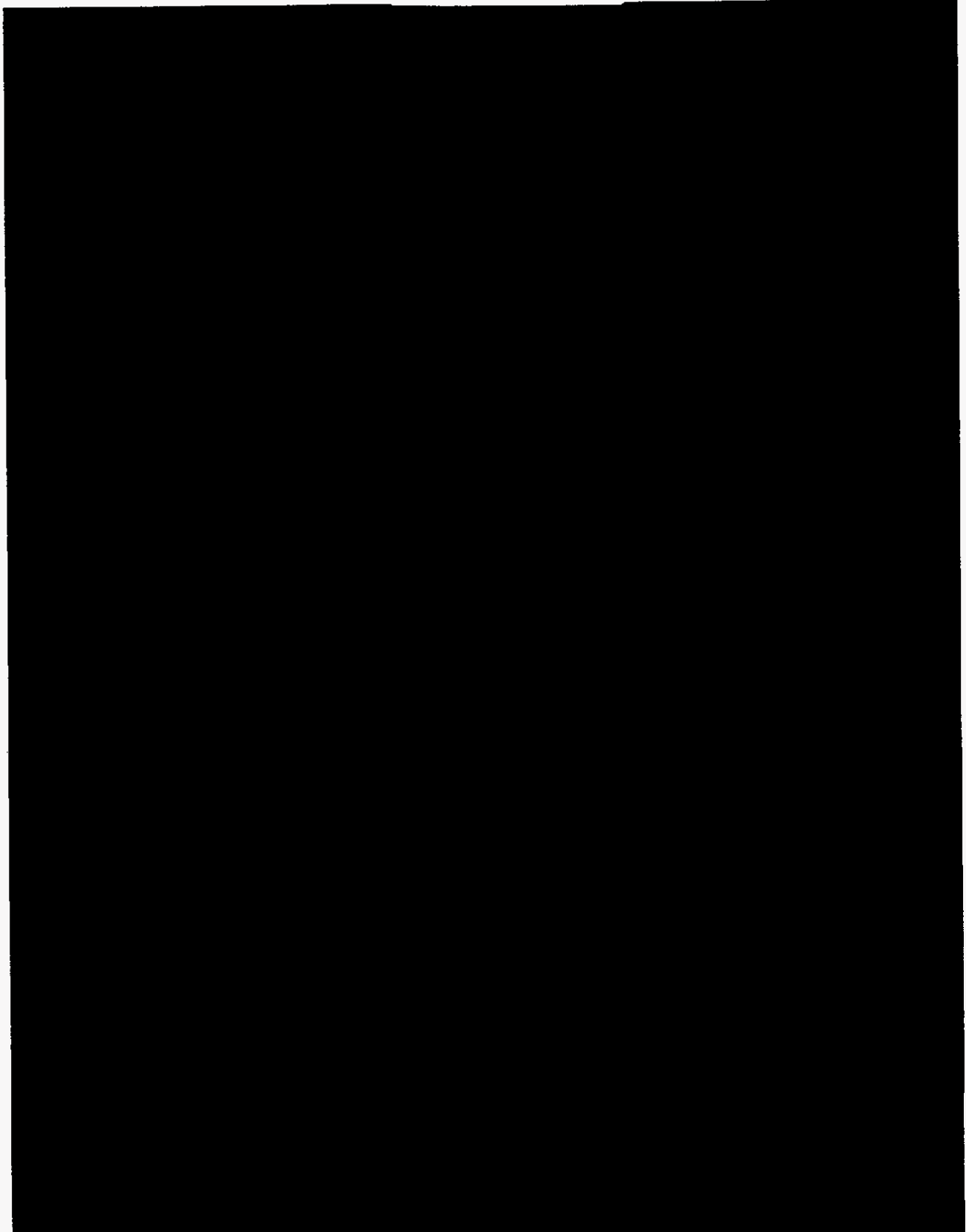
With this Revision, there are no changes to the EPU IPP Capital Financial View. The AFUDC decreases \$2.1M due to a recalculation based on more detailed component in-service dates.

CAPEX

Project to Date	2006	2007	2008	2009	2010	2011	2012	Total
IPP Rev 0								
IPP Rev 1	\$2,299,673	\$38,520,916	\$65,137,304	\$14,179,832	\$85,493,830			
IPP Rev 2	\$2,299,673	\$38,520,916	\$65,137,304	\$15,749,566	\$10,572,571			
IPP Rev 3	\$2,299,673	\$38,520,916	\$65,137,304	\$15,340,896	\$87,582,866			
Change Between Rev 2 & Rev 3	\$0	\$0	\$0	(\$10,608,670)	(\$25,990,385)			
AFUDC								
IPP Rev 0								
IPP Rev 1		\$554,458	\$4,540,881	\$10,277,866	\$9,741,000			
IPP Rev 2		\$554,458	\$4,540,881	\$9,395,586	\$9,068,679			
IPP Rev 3		\$554,458	\$4,540,881	\$10,773,959	\$9,569,244			
Change Between Rev 2 & Rev 3	\$0	\$0	\$0	\$1,778,373	\$500,565			
Grand Total								
IPP Rev 0								
IPP Rev 1	\$2,299,673	\$39,075,373	\$69,678,185	\$15,165,698	\$95,214,830			
IPP Rev 2	\$2,299,673	\$39,075,373	\$69,678,185	\$15,345,162	\$12,641,250			
IPP Rev 3	\$2,299,673	\$39,075,373	\$69,678,185	\$15,944,855	\$97,151,430			
Change Between Rev 2 & Rev 3	\$0	\$0	\$0	(\$59,430,297)	(\$25,489,820)			

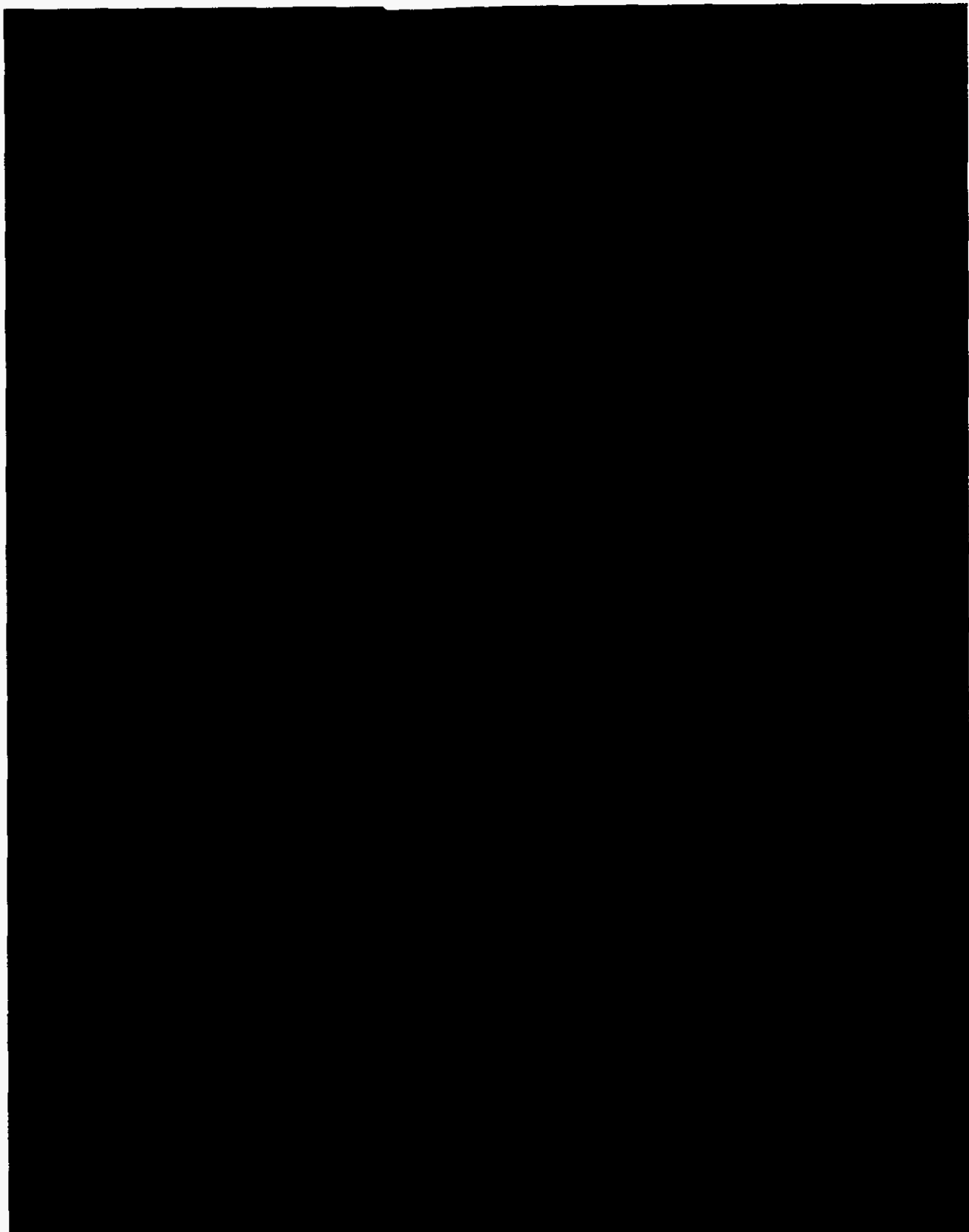
* Breakdown by year was not available for IPP Rev 0
 ** Does Not Include Joint Owners Credits

REDACTED

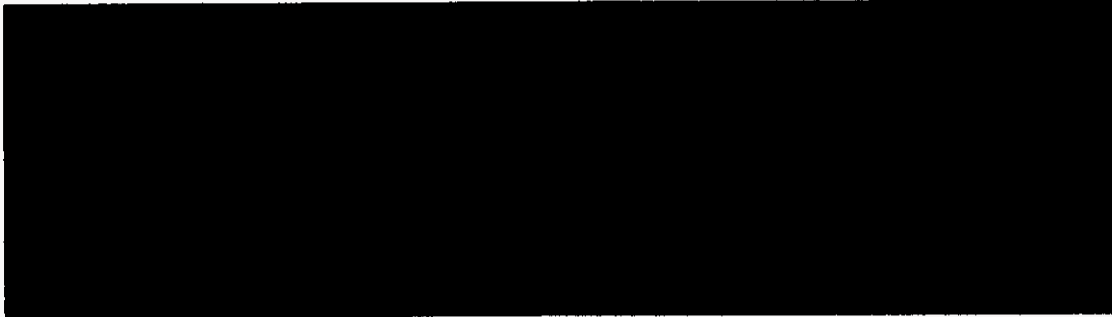


11PMA-DR1CR3-7-000016
11NC-OPCPOD1-2-000016

REDACTED



11PMA-DR1CR3-7-000018
11NC-OPCPOD1-2-000018



6. Risk Assessment

Integral to the Project is the process for evaluating and managing risk. Each Task Manager is responsible for identifying risk items, documenting the risk items in the (Action Item Management System) AIMS database, evaluating each risk item, and developing an action plan to manage the risk to acceptable levels. Risk items identified will be documented in AIMS Risk Management Database and dispositional using one of three methods:

- Mitigation planning (Risk Matrix – RED area)
- Develop Contingency plans (Risk Matrix – YELLOW area)
- Accept the risk (Risk Matrix - GREEN area)

Each evaluation is complete when actions are identified that move the risk item into a green area as shown in the Risk Matrix discussed in this section of the IPP. The Risk Management planning phased of Detailed Task Plan (DTP) development commenced the 2nd quarter of 2008 and will continue through the RFO-17 planning effort. This timing was established following the transition into detailed design development and solidifying conceptual implementation plans in 2008. These implementation strategies are now carried forward into DTPs and the Risk Management Process. The process is described in the following section.

Risk items that fall into the red area require mitigation actions to reduce the risk. A follow up evaluation will occur assuming the mitigation actions are implemented. The follow-up evaluation should result in reduced risk such that the result will fall into the yellow or green risk area. If the item results in a green risk, the evaluation is complete and the mitigation actions will be tracked in AIMS to closure. If the secondary evaluation (assuming the mitigation plan is fully implemented) yields a result in the yellow area, a contingency plan must also be established to deal with the event, if it occurs. Development of the contingency plan with inclusion in the DTP and contingency funding should lower the risk to green. When performing the initial risk evaluation, the result of the evaluation falls into the yellow area, a contingency plan as described in the previous paragraph is required to drive the risk to green, a manageable area from a risk perspective. The evaluation matrix is shown for discussion purposes.

REDACTED

7. Contract & Procurement Strategy

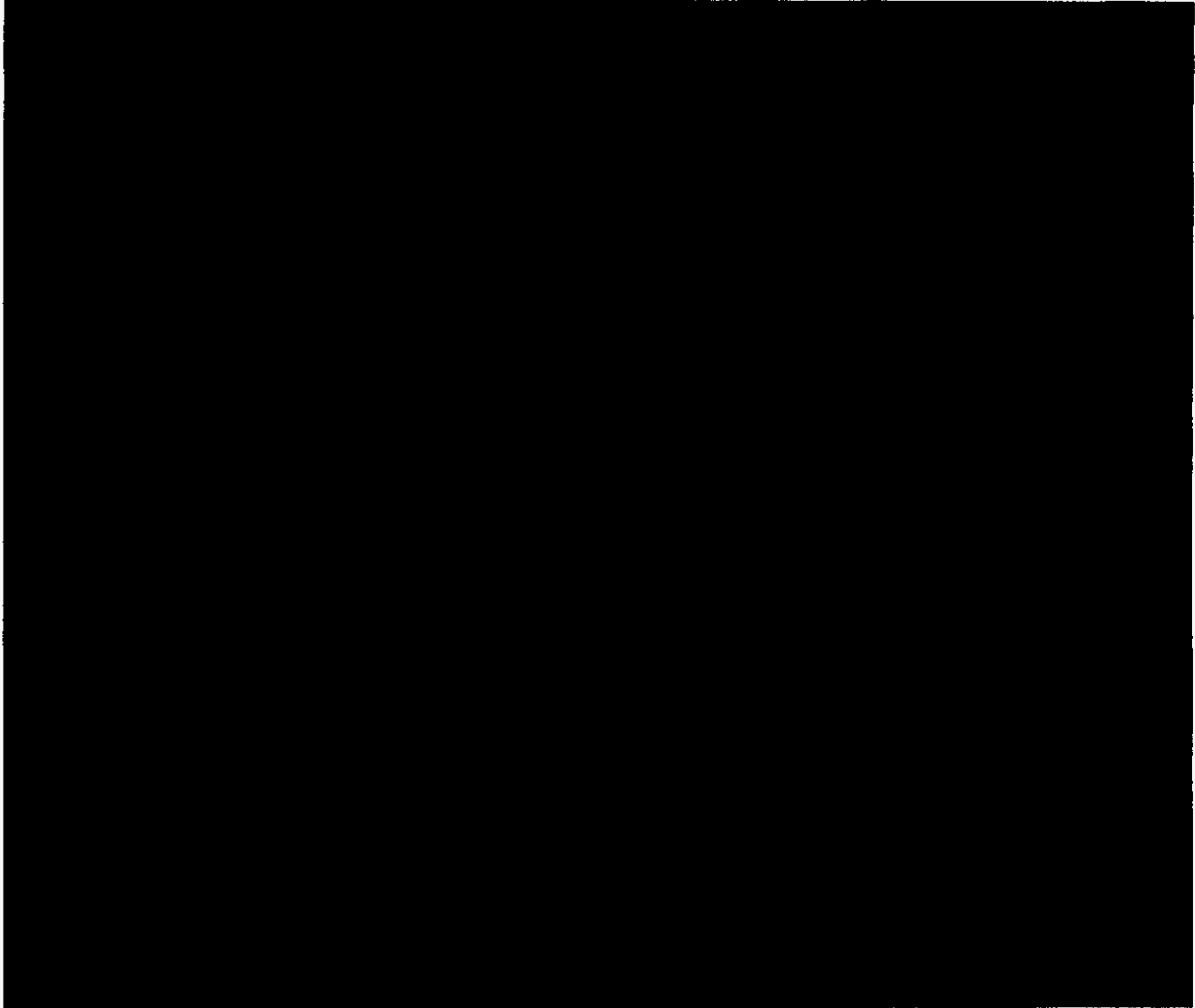


Table 2: Contract Portfolio

Contractors Name	Contract Type	Original Value	Current Value	Pricing Method
Siemens	WA			
AREVA NSSS	WA			
AREVA BOP	WA			
Atlantic R16	Fleet Contract			
Evap Tech (On Hold) POD	One Time			
Thermal Engineering International	One Time			
Remaining Contracts (11)	Mix			
Total				

8. Regulatory Requirements

8.1 Permitting

There are two primary regulatory ‘permits’ required: 1) Site Certification from the Florida Department of Environmental Protection (FDEP), and 2) License Amendment from the NRC. PEF received an amended “Conditions of Certification” or COC for Units 3, 4, and 5, in August 2008. CR3 was not issued a separate COC. The COC recognizes PEF’s intention to construct a new cooling tower to mitigate thermal impacts from the EPU in order to maintain compliance with the existing NPDES permit.

The primary approval for the Extended Power Uprate change in Rated Thermal Power by the NRC will be an extensive license amendment request scheduled to be filed in mid 2010. As other separable items or issues are identified they will be pursued earlier and separately to allow the EPU to be as straight-forward as possible. The initial effort will be to meet with the appropriate NRC staff to determine if formal review and approval is necessary. The inputs to the EPU LAR as well as any other regulatory approvals are addressed in the overall project schedule and controlled like any other project task.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost Recovery
Clause

Docket No. 110009-EI

Second Request for Confidential Classification

**DOCUMENTS RESPONSIVE TO CITIZENS'
REQUEST FOR PRODUCTION NO. 3
BEARING BATES NOS.
11NC-OPCPOD1-3-000001
Through
11NC-OPCPOD1-3-000153
ARE REDACTED IN THEIR ENTIRETY**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost Recovery
Clause

Docket No. 110009-EI

Second Request for Confidential Classification

**DOCUMENTS RESPONSIVE TO CITIZENS'
REQUEST FOR PRODUCTION NO. 4
BEARING BATES NOS.
11NC-OPCPOD1-4-000001
Through
11NC-OPCPOD1-4-000135
ARE REDACTED IN THEIR ENTIRETY**

REDACTED

License Application	2005 - 2008	2009 ⁽²⁾	2010 ⁽³⁾	2011 ⁽⁴⁾	2012	2013
Budget	(1)	1,843,533	1,590,257	1,171,945	1,904,456	403,715
Actuals	(1)	3,249,444	2,563,210	263,299		

(1) Prior to 2009 all expenses were categorized as Project Management or PowerBlock Engineering. However licensing expenses were captured in a support project under the licensing task L0401. These costs were adjusted to the licensing project in the first quarter of 2009; therefore, 2009 includes all licensing and much of the Areva WA84 activities costs up to and including 2009. Since the LAR Preparation category was not being used prior to 2009, there was no budget in prior years for the category. Engineering and Licensing Budgets were determined by segregating task item 14 from section 10 of Areva contract 101659 WA84. All other tasks were identified as engineering.

(2) 2009 Filing Schedules differs from this breakdown as follows:

Budget for 2009 of \$16,162,894 included \$14,319,361 engineering related expenses

Actuals for 2009 of \$20,016,839 included \$18,033,632 engineering expenses and did not include any Areva WA84 CO23 payment of [REDACTED] a correction to recategorize this payment is scheduled to be completed in 2011)

(3) 2010 Filing Schedules differs from this breakdown as follows:






Actuals for 2010 of \$3,265,805 included \$702,675 engineering expenses (a correction to recategorize these payments are scheduled to be completed in 2011)

(4) 2011 Actuals are for January - March only

CR3 EPU Licensing Expenses Submitted on 2010 True-Up Filing T-6 Schedule 2010

Areva LAR Re-Write Activities C/O 23	[REDACTED]	
Areva LAR Inputs (51-Doc)	[REDACTED]	
Areva C/O's not Licensing Support	[REDACTED]	
NRC Charges	34,442.00	
PE Company Labor and Expenses	634,114.17	
Augmented Labor and Expenses	[REDACTED]	
Worley Parsons	[REDACTED]	
Holtec Int'l	[REDACTED]	
Maracor Software & Engineering	[REDACTED]	
Sciencetech	[REDACTED]	
Tetra Tech	[REDACTED]	
<i>Subtotal of LAR Submittital Related Expenses</i>		3,265,884.90
Licensing Expenses on 2010 T-6 Schedule		<u><u>3,265,884.90</u></u>
 <i>2010 Licensing Expenses needing to be adjusted in 2011</i>		
Areva C/O's not Licensing Support	[REDACTED]	
PE Company Labor and Expense from Licensing to Engineering	-7,039.00	
Holtec Int'l from Licensing to Engineering	[REDACTED]	
Sciencetech from Licensing to Engineering	[REDACTED]	
Worley Parsons	[REDACTED]	
Adjustment of 2010 Charges from Licensing to Engineering		-702,675.29
Actual Licensing Expenses Incurred in 2010		<u><u>2,563,209.61</u></u>

CR3 EPU Licensing Expenses Submitted on 2009 True-Up Filing T-6 Schedule 2009

Engineering Related Expenses		
Areva Non-Licensing Engineering	17,520,137.00	
Other Misc Non-Licensing Engineering Related Expenses	67,970.00	
PE Company Labor, Augmented Labor, Non-Licensing Expenses	<u>445,525.00</u>	
<i>Subtotal of Engineering Related Expenses</i>		18,033,632.00
Actual Expenses January - June 2009 (Pre-expert panel)		
Areva LAR Inputs (51-Doc)		
PE Company and Augmented Labor and Expenses Jan-Jun	21,798.00	
<i>Subtotal of LAR Submittital Related Expenses January - June 2009 (Pre-expert panel)</i>		821,798.00
Actual Expenses July - December 2009 (Post-expert panel)		
Areva LAR Re-Write Activities CO-23		
PE Company and Augmented Labor and Expenses Jul-Dec	413,409.00	
Areva LAR Support Progress Payment		
Excel Services June-Dec		
NRC Charges	126,667.50	
Adjustment of 2008 Charges to Permitting	<u>-106,077.00</u>	
<i>Subtotal of LAR Submittital Related Expenses July - December 2009 (Post-expert panel)</i>		1,161,408.88
Licensing Expenses on 2009 T-6 Schedule		<u>20,016,838.88</u>
Actual 2009 Licensing Expenses Incurred		
LAR Submitted Expenses January - December 2009	1,983,206.88	
Adjustment of 2009 Charges for Areva WA 84 CO-23 from Engineering to Licensing		
<i>Actual Licensing Expenses Incurred in 2009</i>		<u>3,249,443.88</u>

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost Recovery
Clause

Docket No. 110009-EI

Second Request for Confidential Classification

**DOCUMENTS RESPONSIVE TO CITIZENS'
INTERROGATORY NO. 2
BEARING BATES NOS.
11NC-OPCINT1-2-000001
Through
11NC-OPCINT1-2-000118
ARE REDACTED IN THEIR ENTIRETY**

PROGRESS ENERGY FLORIDA DOCKET 110009-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000007	1 st block, 1 st 2 bullet points in their entirety; 9 th block, 2 nd bullet point, last two words; 10 th block, 1 st bullet point, 2 nd line, third and fourth words, 2 nd bullet point, 2 nd line in its entirety, Last block, last three words	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000008	1 st block, 2nd line, last four words, last line in its entirety; 2 nd block in its entirety except 1 st two words; 4 th block, 2 nd sentence in its entirety; 7 th block in its entirety except first sentence; 2 nd paragraph from end of page in its entirety	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000010	Bottom of page, 2 nd column, numbers in lines 3 through 9 and 14 through 16	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p>

PROGRESS ENERGY FLORIDA DOCKET 110009-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000011	Table 2 nd column, numbers in lines 1 through 11, 15 through 20 and 23 through 24, last bullet point on page	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000012	1 st paragraph, 1 st line, twelfth word; 1 st Table, all information exclusive of headings, 2 nd Table, columns 2 through 6, all information exclusive of headings	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

PROGRESS ENERGY FLORIDA DOCKET 110009-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000013	1 st paragraph, 2 nd line, fourth word to end, 4 th line, last word, last line, first word; 2 nd paragraph, 2 nd line, fifth word	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000016	Paragraph numbered 1 in its entirety; last three paragraphs in their entirety	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000017	1 st Paragraphs numbered 4 and 5 in their entirety	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat.</p>

PROGRESS ENERGY FLORIDA DOCKET 110009-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000021	Last table on page. 3 rd column in its entirety exclusive of heading	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000022	1 st Table, last column in its entirety, 2 nd and 3 rd tables last column in their entirety exclusive of headings	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens'	Last paragraph in its	§366.093(3)(d), Fla. Stat.

**PROGRESS ENERGY FLORIDA DOCKET 110009-EI
 Second Request for Confidential Classification
 Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000023	entirety except 1 st five words	<p>The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000030	2 nd from last paragraph, 1 st line, ninth word, 2 nd line, eighth word	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000031	Last table, 2 nd , 3 rd and 4 th columns in their entirety exclusive of headings	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question</p>

**PROGRESS ENERGY FLORIDA DOCKET 110009-EI
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Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000032</p>	<p>2nd, 3rd and 4th columns of table in their entirety exclusive of headings and last number in last row</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000033</p>	<p>Table columns 2 through 6 in their entirety exclusive of headings, last paragraph, 2nd line, 1st four words</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Request for Production</p>	<p>2nd paragraph, 3rd line, fourth and fifth words from</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains</p>

PROGRESS ENERGY FLORIDA DOCKET 110009-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
No. 1, Bates No. 11NC- OPCPOD1-1-000034	end. 4 th line, third and fourth words from end; 3 rd paragraph, 1 st line, fifth, sixth, ninth and tenth words; COLA chart, 3 rd , 4 th and 7 th blocks from left	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 portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC- OPCPOD1-1-000035	Table lines 1, 5, 8, 9, 10 and 14 in their entirety	§366.093(3)(d), Fla. Stat. The document in question contains 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 portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC- OPCPOD1-1-000037	1 st Table. Last column in its entirety exclusive of heading	§366.093(3)(d), Fla. Stat. The document in question contains 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 portions in question contain confidential information

PROGRESS ENERGY FLORIDA DOCKET 110009-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000038	Line numbered 2, last six words; line numbered 2, last three words, Lines numbered 4, 5, 7, 8 and 11 in their entirety	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000039	1 st Table, Column 1, Line No. 2 last six words, Line No. 3 last three words, Lines No. 4, 6, 7, 8 and 11 in their entirety; Table Col. 2 in its entirety exclusive of heading; 2 nd table, 1 st line last word, Paragraph numbered in its entirety, paragraph titled Risk in its entirety	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-	1 st paragraph titled Response/Plan in its entirety, Paragraph	§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual

PROGRESS ENERGY FLORIDA DOCKET 110009-EI
Second Request for Confidential Classification
Confidentiality Justification Matrix

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
OPCPOD1-1-000040	Number 6 in its entirety, Paragraph titled Risk in its entirety; 2 nd Paragraph titled Response/Plan in its entirety	<p>information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000045	1 st Table, all information in columns 2 and 3 exclusive of headings, Notes 1, 2 and 3 in their entirety, 1 st four bullet points in their entirety	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000046	Key Points in their entirety; 1 st bullet point, 2 nd line, last four words, 4 th bullet point, last two words	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business</p>

**PROGRESS ENERGY FLORIDA DOCKET 110009-EI
 Second Request for Confidential Classification
 Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000047	Table, all information exclusive of headings	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000057	Paragraph No. 2, last three words; Paragraphs titled Risk and Response/Plans in their entirety, Paragraph No. 3, last three words	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000058	1 st Paragraph titled Response/Plan in its entirety, Line No. 7 in its entirety, 2 nd paragraph	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of</p>

**PROGRESS ENERGY FLORIDA DOCKET 110009-EI
 Second Request for Confidential Classification
 Confidentiality Justification Matrix**

DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
	titled Risk in its entirety	<p>which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000059	All paragraphs titled Response/Plan and Risk in their entirety, Paragraph No. 6 in its entirety	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 1, Bates No. 11NC-OPCPOD1-1-000060	Paragraph No. 11 and Paragraph titled Risk and Response/Plan in their entirety	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which</p>

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		would impair the competitive business of the provider/owner of the information.
PEF Response to Citizens' First Request for Production No. 2, Bates No. 11NC-OPCPOD1-2-000011	No. 1 2 nd paragraph in its entirety	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 2, Bates No. 11NC-OPCPOD1-2-000015	Entire page	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 2, Bates No. 11NC-OPCPOD1-2-000016	Entire page	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts</p>

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 2, Bates No. 11NC-OPCPOD1-2-000018	Entire page	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 2, Bates No. 11NC-OPCPOD1-2-000019	1 st three paragraphs in its entirety	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive</p>

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		business of the provider/owner of the information.
PEF Response to Citizens' First Request for Production No. 2, Bates No. 11NC-OPCPOD1-2-000022	Entire page exclusive of heading	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 2, Bates No. 11NC-OPCPOD1-2-000023	Table, last three columns in their entirety exclusive of headings	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000001	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services</p>

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		<p>on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000002 through 11NC-OPCPOD1-3-000019	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000020 through 11NC-OPCPOD1-3-000027	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of</p>

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		the information.
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000028 through 11NC-OPCPOD1-3-000041	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000042 through 11NC-OPCPOD1-3-000050	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000051 through 11NC-OPCPOD1-3-000055	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p>

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000056 through 11NC-OPCPOD1-3-000064</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000065 through 11NC-OPCPOD1-3-000071</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

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PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000072 through 11NC-OPCPOD1-3-000076	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000077 through 11NC-OPCPOD1-3-000084	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000085 through 11NC-OPCPOD1-3-000093	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p>

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		<p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000094 through 11NC-OPCPOD1-3-000099</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000100 through 11NC-OPCPOD1-3-000116</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>

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PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000117 through 11NC-OPCPOD1-3-000120	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000121 through 11NC-OPCPOD1-3-000126	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000127 through 11NC-OPCPOD1-3-000130	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat.</p>

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000131 through 11NC-OPCPOD1-3-000133	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000134 through 11NC-OPCPOD1-3-000139	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens'	Entire Document	§366.093(3)(d), Fla. Stat.

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First Request for Production No. 3, Bates No. 11NC-OPCPOD1-3-000140 through 11NC-OPCPOD1-3-000153		<p>The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 4, Bates No. 11NC-OPCPOD1-4-000001 through 11NC-OPCPOD1-4-000018	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 4, Bates No. 11NC-OPCPOD1-4-000019 through 11NC-OPCPOD1-4-000022	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question</p>

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		<p>contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Request for Production No. 4, Bates No. 11NC-OPCPOD1-4-000023 through 11NC-OPCPOD1-4-000026</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Request for Production No. 4, Bates No. 11NC-OPCPOD1-4-000027 through 11NC-OPCPOD1-4-000044</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Request for Production</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains</p>

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No. 4, Bates No. 11NC-OPCPOD1-4-000045 through 11NC-OPCPOD1-4-000079		<p>confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 4, Bates No. 11NC-OPCPOD1-4-000080 through 11NC-OPCPOD1-4-000088	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Request for Production No. 4, Bates No. 11NC-OPCPOD1-4-000089 through 11NC-OPCPOD1-4-000132	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information</p>

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		relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Citizens' First Request for Production No. 4, Bates No. 11NC-OPCPOD1-4-000133 through 11NC-OPCPOD1-4-000135	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 1, Bates No. 11NC-OPCINT1-1-000001	Paragraph No. 2), line, third word	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 1, Bates No. 11NC-OPCINT1-	Table 2 nd column, numbers on lines 1 through 3, 6 through 11, 14 and 16	§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual

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1-000002	through 18	<p>information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 1, Bates No. 11NC-OPCINT1-1-000003	Table 2 nd column, numbers on lines 7, 11, 13, 14 and 21	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000001	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business</p>

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		interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000002	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000003 through 11NC-OPCINT1-2-000006	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000007 through 11NC-	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of</p>

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OPCINT1-2-000009		<p>which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000010 through 11NC-OPCINT1-2-000023	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000024 through 11NC-OPCINT1-2-000025	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which</p>

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		would impair the competitive business of the provider/owner of the information.
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000026 through 11NC-OPCINT1-2-000027	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000028 through 11NC-OPCINT1-2-000029	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000030 through 11NC-OPCINT1-2-000031	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts</p>

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		<p>to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000032 through 11NC-OPCINT1-2-000057</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000058 through 11NC-OPCINT1-2-000060</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive</p>

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		business of the provider/owner of the information.
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000061 through 11NC-OPCINT1-2-000073	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000074 through 11NC-OPCINT1-2-000075	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000076 through 11NC-OPCINT1-2-000077	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services</p>

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		<p>on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000078 through 11NC-OPCINT1-2-000080</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
<p>PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000081 through 11NC-OPCINT1-2-000083</p>	<p>Entire Document</p>	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of</p>

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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
		the information.
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000084 through 11NC-OPCINT1-2-000110	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>
PEF Response to Citizens' First Interrogatories No. 2, Bates No. 11NC-OPCINT1-2-000111 through 11NC-OPCINT1-2-000118	Entire Document	<p>§366.093(3)(d), Fla. Stat. The document in question contains confidential contractual information, the disclosure of which would impair PEF's efforts to contract for goods or services on favorable terms.</p> <p>§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.</p>