

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

110323-EI

In re: FPSC Review of Coal Combustion
Residual Storage and Disposal Process
Of the Florida Electric Industry.

Docket No. Undocketed

Dated: November 23, 2011

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COMMISSION
CLERK

**AFFIDAVIT OF ROB REYNOLDS IN SUPPORT OF
PROGRESS ENERGY FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF NORTH CAROLINA

COUNTY OF WAKE

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

1. My name is Rob Reynolds. I am over the age of 18 years old and I have
been authorized by Progress Energy Florida (hereinafter "PEF" or the "Company") to
give this affidavit in the above-styled proceeding on PEF's behalf and in support of
PEF's Request for Confidential Classification. The facts attested to in my affidavit are
based upon my personal knowledge.

2. I am the Senior Coal Procurement Agent in the Fuels and Power
Optimization Department. This section is responsible for coal procurement for both PEF
and Progress Energy Carolinas ("PEC") systems.

3. As the Senior Coal Procurement Agent, I am responsible for the sales and
marketing of coal combustion products to various customers for PEF's and PEC's coal
generation facilities.

COM _____
APA _____
ECB 5 _____
GCL 1 _____
RAD 1 _____
SRC _____
ADM _____
OPC _____
CLK _____

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FPSC-COMMISSION CLERK

4. PEF is seeking confidential classification for portions of information contained in the FPSC's Review of Coal Combustion Residual Storage and Disposal Processes of the Florida Electric Industry and responses to Data Request 2. A detailed description of the confidential information at issue is contained in confidential Exhibit A to PEF's Request for Confidential Classification and is outlined in PEF's Justification Matrix that is attached to PEF's Request for Confidential Classification as Exhibit C. PEF is requesting confidential classification of this information because it contains sensitive business information, the disclosure of which would impair the Company's efforts to contract for goods or services on favorable terms.

5. PEF negotiates with potential coal ash residual end-users to obtain competitive contracts for coal ash products that provide economic value to PEF and its ratepayers. In order to obtain such contracts, however, PEF must be able to assure customers that sensitive business information, such as pricing, will be kept confidential. With respect to the information at issue in this Request, PEF has kept confidential and has not publicly disclosed confidential information pertaining to the coal ash product costs. Absent such measures, customers would run the risk that sensitive business information that they provided in their bids/contracts with PEF would be made available to the public and, as a result, end up in possession of potential competitors. Faced with that risk, persons or companies who otherwise would contract with PEF might decide not to do so if PEF did not keep specific information confidential. Without PEF's measures to maintain the confidentiality of sensitive terms in contracts between PEF and suppliers, the Company's efforts to obtain competitive coal ash residual contracts could be undermined.

6. Additionally, the disclosure of confidential information in the contracts, could adversely impact PEF's competitive business interests. If such information was disclosed to PEF's competitors, PEF's efforts to obtain competitive supply options that provide economic value to both PEF and its ratepayers could be compromised by PEF's competitors changing their consumption or purchasing behavior within the relevant markets.

7. Upon receipt of confidential information from fuel suppliers, and with its own confidential information, strict procedures are established and followed to maintain the confidentiality of the terms of the documents and information provided, including restricting access to those persons who need the information to assist the Company, and restricting the number of, and access to the information. At no time since receiving the pricing information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information and contracts at issue as confidential.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 16th day of November, 2011.



(Signature)
Rob Reynolds
Senior Coal Procurement Agent
Fuels and Power Optimization Department
Progress Energy Carolinas
Post Office Box 1551
Raleigh, NC. 27602

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 16th day of November, 2011 by Rob Reynolds. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.



(Signature)

DONNA J. SEARS

(Printed Name)

NOTARY PUBLIC, STATE OF NC

AUGUST 23, 2014

(Commission Expiration Date)

(AFFIX NOTARIAL SEAL)

(Serial Number, If Any)

DONNA J. SEARS
NOTARY PUBLIC
Wake County
North Carolina
My Commission Expires Aug. 23, 2014

