

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Requirement for investor-owned electric utilities to file ongoing storm preparedness plans and implementation cost.

Docket No. 060198-EI

Dated: September 15, 2006

**NOTICE OF INTENT TO REQUEST
CONFIDENTIAL CLASSIFICATION**

Progress Energy Florida, Inc., (“PEF” or “Company”), pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), submits this Notice of Intent to Request Confidential Classification of confidential portions of PEF’s responses to Staff’s Informal Data Request dated September 8, 2006 in regard to PEF’s Integrated Vegetation Management Plan.

Specifically, portions of PEF’s responses to Staff’s Data Request contains sensitive business information concerning the amount of lines trimmed, dollars to be spent, and future vegetation management plans, the disclosure of which would impair the competitive business interests of the Company. If this information was disclosed, it could cause suppliers and competitors to change their behavior in the market.

Attached as Exhibit A is a confidential, highlighted copy of the above referenced documents.

Pursuant to Rule 25-22.006(3)(a)(1), PEF will file its Request for Confidential Classification for such confidential information contained therein within twenty-one (21) days of filing this request.

RESPECTFULLY SUBMITTED this 15th day of September, 2006.

DOCUMENT NUMBER DATE
08518 SEP 15 06
FPSC-COMMISSION CLEAR

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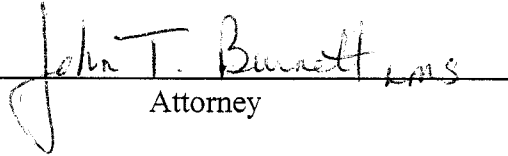
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PROGRESS ENERGY FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Progress Energy Florida, Inc.'s Notice of Intent to Request for Confidential Classification (without attachments) in Docket No. 060198-EI has been furnished by regular U.S. mail to the following this 13th day of September, 2006.



Attorney

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**Staff's Informal Vegetation Management Data Requests for PEF
(Based on Discussion at September 8, 2006, Telephone Meeting between
PEF and Staff)**

For Data Requests 1 through 3, please refer to Progress Energy Florida Inc.'s (PEF) amended response to Staff's July 14, 2006, informal data regarding the comparison of performance and incremental cost over a 10 year period. The table compares cost and performance for an average three year trim cycle for laterals and an average three year trim cycle for feeders (FPSC Plan) to an average five year trim cycle for laterals and a three year average trim cycle for feeders (PEF's IVM Program).

1. What is the methodology, assumptions, and calculations (the latter in spreadsheet format, including annual projections) used for estimating "average annual storm CI avoided per event" and "Tree SAIFI in 10 Years" for both the FPSC Plan and the PEF IVM program?
2. What are the cost components that make up the \$7,000,000 incremental difference in vegetation management between the FPSC plan and the PEF IVM program? How were these amounts estimated? Provide assumptions used. In addition, if not included in the \$7,000,000 incremental difference, please provide PEF's best estimate of offsetting (O&M) costs reflecting reduced outage restoration costs which may be expected during non-storm periods associated with the FPSC Plan and the PEF IVM program. If it is not part of the \$7,000,000, explain why it is not.
3. Please provide similar comparative analysis shown in the table using four year trim cycle for laterals.
4. Refer to the table on Page 1 of the July 14 response titled "Vegetation Management Cycle for Distribution Circuits. The table shows the cycle trimming under the PEF IVM and the FPSC Plan. Please complete a third column titled "Base Plan" (see the base plan PEF includes in its performance and cost table appearing at the end of the same response). Include security patrol miles in each case where appropriate. Explain whether contracted security patrol miles include trimming that is as extensive as contracted vegetation trim miles, and how these two activities differ. Explain to what extent the various trim cycles are averages rather than the period in which all circuits are trimmed. Explain what the range of the trim cycle (in years) may be for any particular feeder or lateral under the three different programs.
5. What is the annual rate of growth and annual miles of growth in PEF's feeders historically and over the next 10 years? Laterals?
6. What is PEF's definition of a tree-preventable outage? Non-preventable tree outage?
7. What is the Company's projected CI for tree caused outages (storm and non-storm) for 2006 and for as many years as the Company makes such projections? What assumptions and methodology does PEF use to make such projections.