

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Progress Energy Florida's Responses
to Staff Data Request regarding FPSC
Complaint # 742137E

MR
070599-EI
Docket No.: ~~Undocketed~~

Dated: September 6, 2007

COMMISSION
CLERK

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**AFFIDAVIT OF THOMAS J. CURRIER IN SUPPORT OF
PROGRESS ENERGY FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is Thomas J. Currier. 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.

CMP _____
COM _____
CTR _____
ECR 1
GCL 1
OPC _____
RCA 1
SCR _____
SGA _____
SEC _____
OTH 1 conf records

2. I am a claims investigator for Progress Energy Florida in the Legal and
Claims Department. This section is responsible for investigating claims initiated by
members of the public.

3. As a claims investigator, I am responsible, along with the other members
of the section, for the investigation of claims by reviewing applicable company records,
interviewing customers, witnesses and PEF employees, photographing and preserving

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evidence, measuring accident scenes and reviewing applicable standards. In addition, if I determine that it is appropriate for PEF to accept liability, I am also responsible for adjusting the customer's claim by determining the amount of the customer's loss. The tasks I perform are under the direct supervision of an attorney.

4. PEF is seeking confidential classification for portions of its responses to Staff's Data Request regarding FPSC Complaint # 742137E. 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 competitive confidential business information of PEF.

5. PEF maintains internal processes, targets and goals of its Claims Department which include the process on how PEF evaluates claims. PEF must ensure that sensitive business information, such as these internal processes, goals and targets of the department and the company will be kept confidential. Absent such measures, PEF would run the risk that this sensitive business information could be made available to the public and that PEF's competitive business interests would be jeopardized. Specifically, the disclosure of this confidential information could adversely impact PEF's competitive business interests because if such information was disclosed, customers who had copies of PEF's policies, targets and goals could use such information in an adverse manner and could adjust their behavior when filing claims, thereby adversely affecting the entire claims process for PEF.

6. PEF has incorporated within its business procedures and processes when filing claims strict procedures that were established and are followed to maintain the confidentiality of the documents 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 and contracts. At no time since establishing the information in question has the Company publicly disclosed that information. The Company has treated and continues to treat the information at issue as confidential.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 4th day of September, 2007.

T. Currier

(Signature)

Thomas J. Currier
Claims Investigator
Legal/Claims Department
Progress Energy Florida
299 First Avenue North
St. Petersburg, FL 33701

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 4th day of September, 2007 by Thomas J. Currier. He is personally known to me, or has produced his _____ driver's license, or his _____ as identification.

Pamela E. Kappes

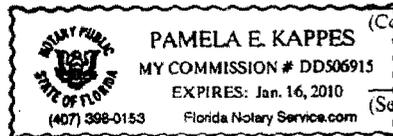
(Signature)

PAMELA E. KAPPES

(Printed Name)

NOTARY PUBLIC, STATE OF FL

(AFFIX NOTARIAL SEAL)



(Commission Expiration Date)

(Serial Number, If Any)