

COMMISSION
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In re: Petition for approval of negotiated purchase power contract with Trans World Energy LLC by Progress Energy Florida, Inc.

Docket No. 110047-EQ

Dated: April 29, 2011

**PROGRESS ENERGY FLORIDA INC.'S
REQUEST FOR 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 Request for Confidential Classification for certain information contained in PEF's Response to Staff's Data Request No. 3, specifically Attachment A, filed on April 29, 2011. In support of this Request, PEF states:

1. PEF's Response to Staff Data Request No. 3 contains information that is "proprietary business information" under Section 366.093(3), Florida Statutes.

2. The following exhibits are included with this request:

(a) Sealed Composite Exhibit A is a package containing unredacted copies of all the documents for which PEF seeks confidential treatment. Composite Exhibit A is being submitted separately in a sealed envelope labeled "CONFIDENTIAL." In the unredacted versions, the information asserted to be confidential is highlighted by yellow marker.

(b) Composite Exhibit B is a package containing two copies of redacted versions of the documents for which the Company requests confidential classification. The specific

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

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information for which confidential treatment is requested has been blocked out by opaque marker or other means.

(c) Exhibit C is a justification table which identifies by page and line the information for which PEF seeks confidential classification and the specific statutory bases for seeking confidential treatment.

3. As indicated in Exhibit C, the information for which PEF requests confidential classification is “proprietary confidential business information” within the meaning of Section 366.093(3), F.S. Specifically, the information at issue relates to competitively negotiated contractual data, such as the comparison of the NPV payments to Trans World versus PEF’s 2011 standard offer contract and the NPV of Net Benefit (cost), the disclosure of which would impair the efforts of the Company or its affiliates to negotiate purchase power contracts on favorable terms. *See* § 366.093(3)(d), F.S.; Affidavit of David Gammon at ¶ 5. Furthermore, the information at issue relates to the competitive interests of both PEF and Trans World, the disclosure of which would impair their competitive businesses. *Id.* § 366.093(3)(e); Affidavit of David Gammon at ¶ 6. Accordingly, such information constitutes “proprietary confidential business information” which is exempt from disclosure under the Public Records Act pursuant to Section 366.093(1), F.S.

4. The information identified as Exhibit “A” is intended to be and is treated as confidential by the Company. *See* Affidavit of David Gammon at ¶ 7. The information has not been disclosed to the public, and PEF has treated and continues to treat the information at issue as confidential. *See* Affidavit of David Gammon at ¶ 7.

5. PEF requests that the information identified in Exhibit A be classified as “proprietary confidential business information” within the meaning of section 366.093(3), F.S., that the

information remain confidential for a period of at least 18 months as provided in section 366.093(4) F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

WHEREFORE, for the foregoing reasons, PEF respectfully requests that this Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 29th day of April, 2011.


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Exhibit B

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Comparison of Payments to Trans World vs. PEF's 2011 Standard Offer
Discount Rate of 6.75%

Dollars in \$000	NPV	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Base Fuel:																						
NPV of Payments to Trans World	\$ 195,656																					
NPV of Avoided Capacity Costs	\$ 15,004	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 884	\$ 1,449	\$ 1,384	\$ 1,323	\$ 1,264	\$ 1,207	\$ 1,154	\$ 1,102	\$ 1,053	\$ 1,006	\$ 962	\$ 919	\$ 878	\$ 419
NPV of Avoided Energy Costs	\$ 209,105	\$ 7,285	\$ 14,080	\$ 14,132	\$ 14,357	\$ 14,013	\$ 13,443	\$ 13,965	\$ 12,799	\$ 11,026	\$ 9,959	\$ 8,254	\$ 8,473	\$ 8,984	\$ 8,465	\$ 8,297	\$ 8,124	\$ 7,758	\$ 7,734	\$ 7,495	\$ 7,278	\$ 3,183
NPV of Net Benefit (Cost)	\$ 28,453																					
High Fuel - 15% Increase:																						
NPV of Payments to Trans World	\$ 195,656																					
NPV of Avoided Capacity Costs	\$ 15,004	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 884	\$ 1,449	\$ 1,384	\$ 1,323	\$ 1,264	\$ 1,207	\$ 1,154	\$ 1,102	\$ 1,053	\$ 1,006	\$ 962	\$ 919	\$ 878	\$ 419
NPV of Avoided Energy Costs	\$ 240,471	\$ 8,378	\$ 16,192	\$ 16,252	\$ 16,511	\$ 16,115	\$ 15,459	\$ 16,060	\$ 14,719	\$ 12,680	\$ 11,453	\$ 9,492	\$ 9,744	\$ 10,332	\$ 9,735	\$ 9,542	\$ 9,342	\$ 8,922	\$ 8,894	\$ 8,619	\$ 8,370	\$ 3,860
NPV of Net Benefit (Cost)	\$ 59,819																					
Low Fuel - 15% Decrease:																						
NPV of Payments to Trans World	\$ 195,656																					
NPV of Avoided Capacity Costs	\$ 15,004	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 884	\$ 1,449	\$ 1,384	\$ 1,323	\$ 1,264	\$ 1,207	\$ 1,154	\$ 1,102	\$ 1,053	\$ 1,006	\$ 962	\$ 919	\$ 878	\$ 419
NPV of Avoided Energy Costs	\$ 177,740	\$ 6,192	\$ 11,968	\$ 12,013	\$ 12,203	\$ 11,911	\$ 11,426	\$ 11,871	\$ 10,879	\$ 9,372	\$ 8,465	\$ 7,016	\$ 7,202	\$ 7,636	\$ 7,195	\$ 7,053	\$ 6,905	\$ 6,594	\$ 6,574	\$ 6,371	\$ 6,188	\$ 2,705
NPV of Net Benefit (Cost)	\$ (2,912)																					

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Exhibit C

**PROGRESS ENERGY FLORIDA
Confidentiality Justification Matrix**

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
PEF Responses to Staff Data Request No. 3	Attachment A: Lines containing the NPV of payments to Trans World and NPV of Net Benefit (cost) for the scenarios of Base Fuel, High Fuel & Low Fuel.	<p>§366.093(3)(d), F.S. The document in question contains confidential 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), F.S. The document in question contains 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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02943 APR 29 =

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