

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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IN RE: NUCLEAR POWER PLANT
COST RECOVERY CLAUSE

Docket No. 110009-EI COMMISSION
Submitted for Filing: July 25, 2014 CLERK

PROGRESS ENERGY FLORIDA, INC.'S NOTICE OF FILING

Progress Energy Florida, Inc. ("PEF" or the "Company"), hereby gives notice of filing of the Affidavit of John Elnitsky in Support of Progress Energy Florida, Inc.'s Sixteenth Request for Confidential Classification regarding portions of Exhibit JE-12 and Exhibit JE-13 to John Elnitsky's Rebuttal Testimony and for portions of PEF's Prehearing Statement filed in this docket.

Respectfully submitted,

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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 25th day of July, 2011.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost
Recovery Clause

Docket No. 110009-EI
Submitting for filing: July 25, 2011

**UNVERIFIED AFFIDAVIT OF JOHN ELNITSKY IN SUPPORT OF PROGRESS ENERGY
FLORIDA, INC.'S SIXTEENTH REQUEST FOR CONFIDENTIAL CLASSIFICATION**

STATE OF FLORIDA

COUNTY OF PINELLAS

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

1. My name is John Elnitsky. I am over the age of 18 years and I have been authorized by Progress Energy Florida, Inc. (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 regarding portions of Exhibit JE-12 and Exhibit JE-13 to my Rebuttal Testimony and to portions of Progress Energy Florida, Inc.'s Prehearing Statement filed in this docket (the "Request"). The facts attested to in my affidavit are based upon my personal knowledge.

2. As Vice President of New Generation Programs and Projects, I am responsible for the licensing and construction of the Levy Nuclear Project ("LNP"), including the direct management of the Engineering, Procurement, and Construction Agreement ("EPC Agreement") with Westinghouse and Shaw, Stone, & Webster (the "Consortium").

3. A detailed description of the confidential information at issue is contained in confidential Attachment A to PEF's Request and is outlined in PEF's Justification Matrix that is attached to PEF's Request as Appendix C.

4. The Company is requesting confidential classification of this information because it contains proprietary and confidential contractual information related to the EPC Agreement, as well as confidential numbers. The EPC Agreement contains non-disclosure provisions that limit the use and forbid the dissemination of this information. Publication of this information would provide PEF's competitors and third-parties with whom PEF desires to contract with valuable insight into the long-term plans for the LNP. The disclosure of this information would impair the Company's ability to contract on favorable terms, or at all, for necessary goods and services to complete the LNP. The Company and its customers would be harmed if PEF were not able to contract for the goods and services necessary to complete the LNP on favorable terms. Also included in the information subject to the Request are the 2010 actual LNP Capital Costs and the 2011 actual/estimated LNP Capital Costs. This information is considered highly confidential and proprietary by the Company and the Consortium.

5. Upon receipt of all this confidential information, 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. At no time has the Company publicly disclosed the information at issue. The Company has treated and continues to treat the information at issue as confidential.

6. This concludes my affidavit.

Further affiant sayeth not.

Dated this _____ day of July, 2011.

(Signature)

John Elnitsky, Vice President of New Generation Programs
and Projects

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this ____ day
of July, 2011 by John Elnitsky. He is personally known to me, or has produced his
_____ driver's license, or his _____ as identification.

(Signature)

(Printed Name)

(AFFIX NOTARIAL SEAL)

NOTARY PUBLIC, STATE OF _____

(Commission Expiration Date)

(Serial Number, If Any)