

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project, by Progress Energy Florida, Inc.

DOCKET NO.: 100437

Filed: April 5, 2013

COMMISSION CLERK

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

PROGRESS ENERGY FLORIDA, INC.'S FIFTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

For DN 01714-13, which is in locked storage. You must be authorized to view this DN.

Progress Energy Florida ("PEF" or the "Company"), pursuant to Section 366.093, Fla. Stats., and Rule 25-22.006, Florida Administrative Code, files this Fifth Request for Confidential Classification for confidential portions of PEF's responses to Staff's Fifth Request for Production (Nos. 16-18).

Specifically, portions of the documents responsive to Staff's Request Nos. 16 and 17 contain sensitive business information such as projected costs and cash flows, the disclosure of which would adversely impact PEF's competitive business interests. Accordingly, PEF hereby submits the following.

Basis for Confidential Classification

Subsection 366.093(1), Florida Statutes, provides that "any records received by the Commission which are shown and found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from [the Public Records Act]." §366.093(1), Fla. Stats. Proprietary confidential business information means information that is (i) intended to be and is treated as private confidential information by the Company, (ii)

because disclosure of the information would cause harm, (iii) either to the Company's ratepayers or the Company's business operation, and (iv) the information has not been voluntarily disclosed to the public. §366.093(3), Fla. Stats. Specifically, "information relating to competitive interests" is defined as proprietary confidential business information if the disclosure of such

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information “would impair the competitive business of the provider of the information.”
§366.093(3)(e), Fla. Stats.

The aforementioned portions of PEF’s responses to Staff’s Fifth Request for Production should be afforded confidential classification because these portions contain proprietary confidential business information. Public disclosure of the information in question would impair PEF’s competitive business interests.

Staff’s Fifth Request for Production Nos. 16 and 17

Portions of PEF’s response to Staff’s Request Nos. 16 and 17 should be afforded confidential treatment for the reasons set forth in the Affidavit of R. Alexander Glenn (“Alex Glenn”) filed in support of PEF’s Fifth Request for Confidential Classification and for the following reasons. Portions of the documents responsive to Request No. 16 and Request No. 17 contain proprietary confidential business information provided to the Company’s Board of Directors related to confidential cost analysis; projected financial impacts related to repair costs; projected and estimated replacement power costs; and projected and estimated insurance reimbursements, the disclosure of which would adversely impact PEF’s competitive business interests by disclosing sensitive business information. See § 366.093(3)(e), F.S.; Affidavit of Alex Glenn at ¶ 5. For example, if PEF’s competitors and counterparties were made aware of such information, they may adjust their behavior in relevant markets and venues. Id. 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.

Strict procedures are established and followed to maintain the confidentiality of the terms of the confidential documents and information at issue, including restricting access to those persons who need the information and documents to assist the Company. See Affidavit of Alex

Glenn at ¶ 6. At no time has the Company publicly disclosed the confidential information or documents at issue. Id. The Company has treated and continues to treat the information and documents at issue as confidential. Id.

Conclusion

Certain portions of PEF's responses to Staff's Fifth Request for Production fit the statutory definition of proprietary confidential business information under Section 366.093 and Rule 25-22.006, Florida Administrative Code, and that information should be afforded confidential classification. In support of this motion, PEF has enclosed the following:

(1). A separate, sealed envelope containing one copy of the confidential Appendix A to PEF's Request for Confidential Classification for which PEF intends to request confidential classification with the appropriate section, pages, or lines containing the confidential information highlighted. **This information should be accorded confidential treatment pending a decision on PEF's request by the Florida Public Service Commission;**

(2). Two copies of the confidential responses with the information for which PEF intends to request confidential classification redacted by section, page, or lines where appropriate as Appendix B; and

(3). A justification matrix supporting PEF's request for confidential classification of the highlighted information contained in confidential Appendix A, as Appendix C.

WHEREFORE, PEF respectfully requests that certain portions of PEF's responses to Staff's Fifth Request for Production, Requests No. 16 and 17, described specifically in Attachment C, be classified as confidential for the reasons set forth above.

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 5th day of April, 2013.



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Exhibit B

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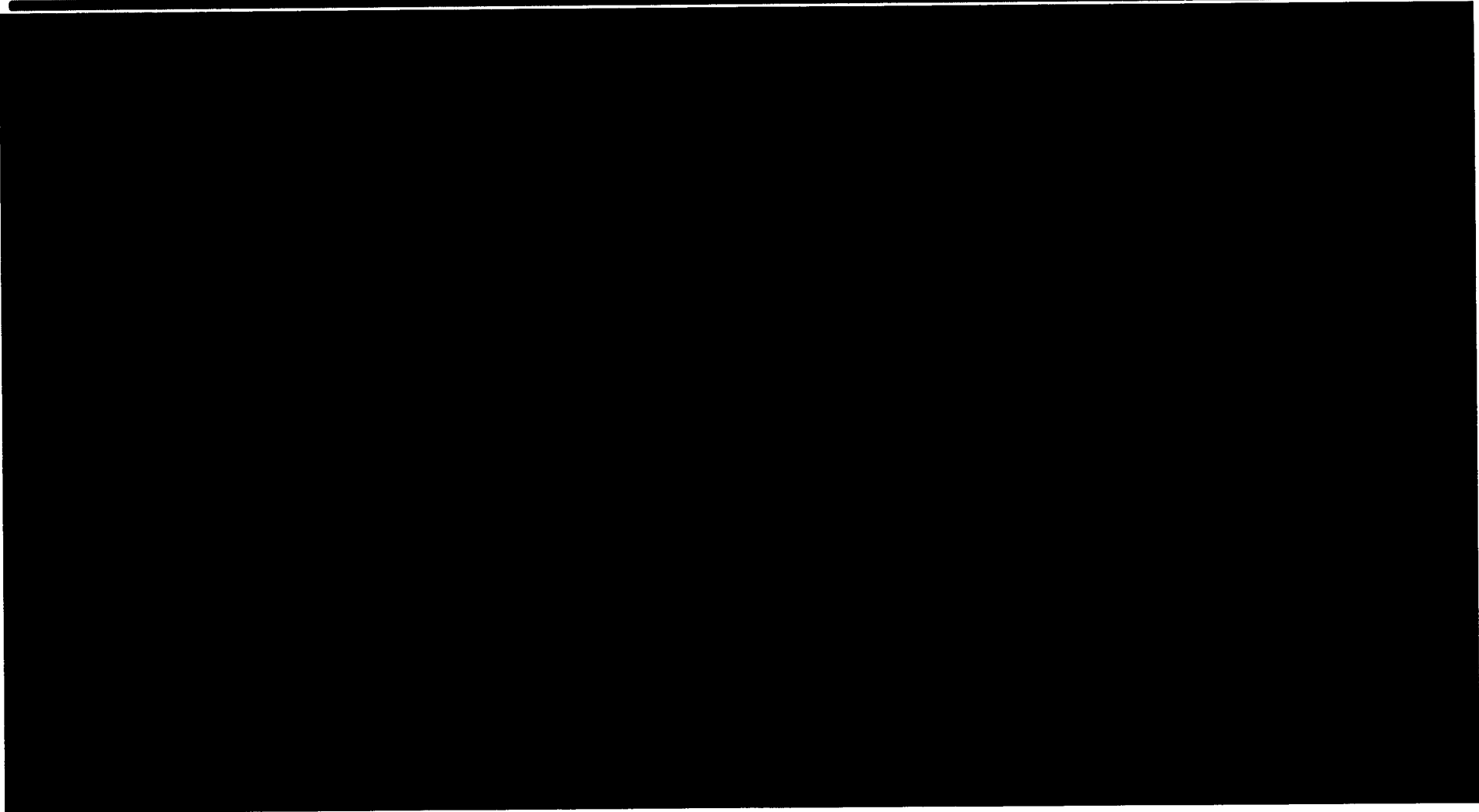
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Key Strategic Issues/Decisions – PEF

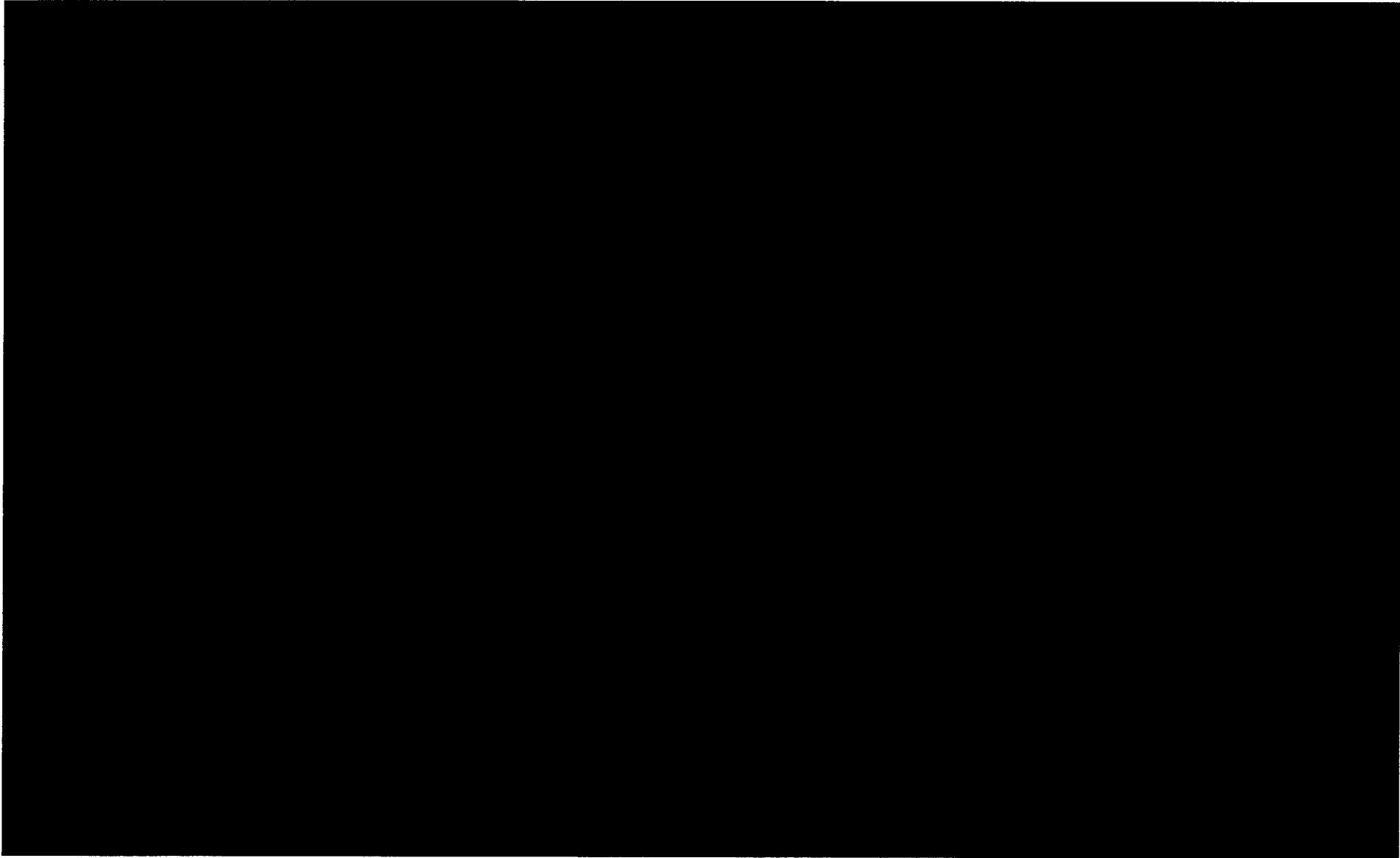
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Strategic Financial Priorities

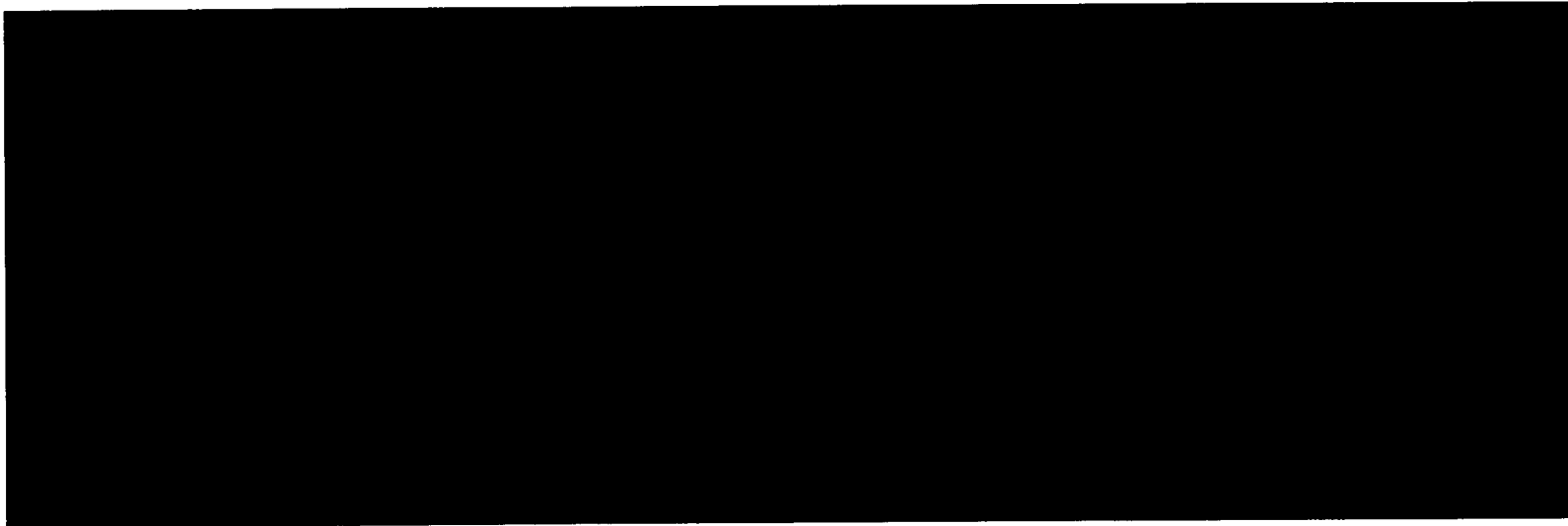
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Credit Metrics and Preservation of Ratings



Focus Area:
Initiative Status

Area	Status	Notes
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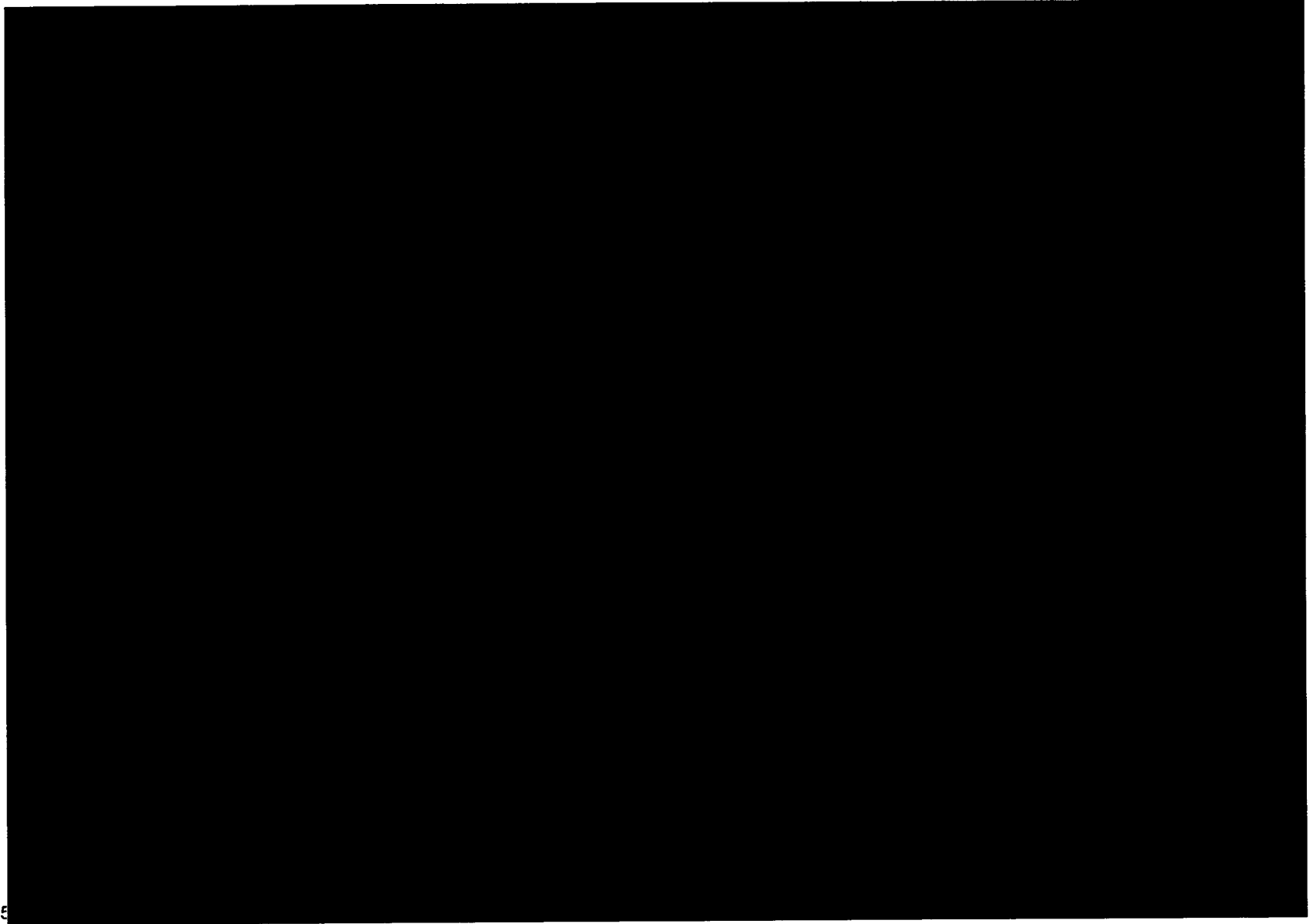
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Focus Area:

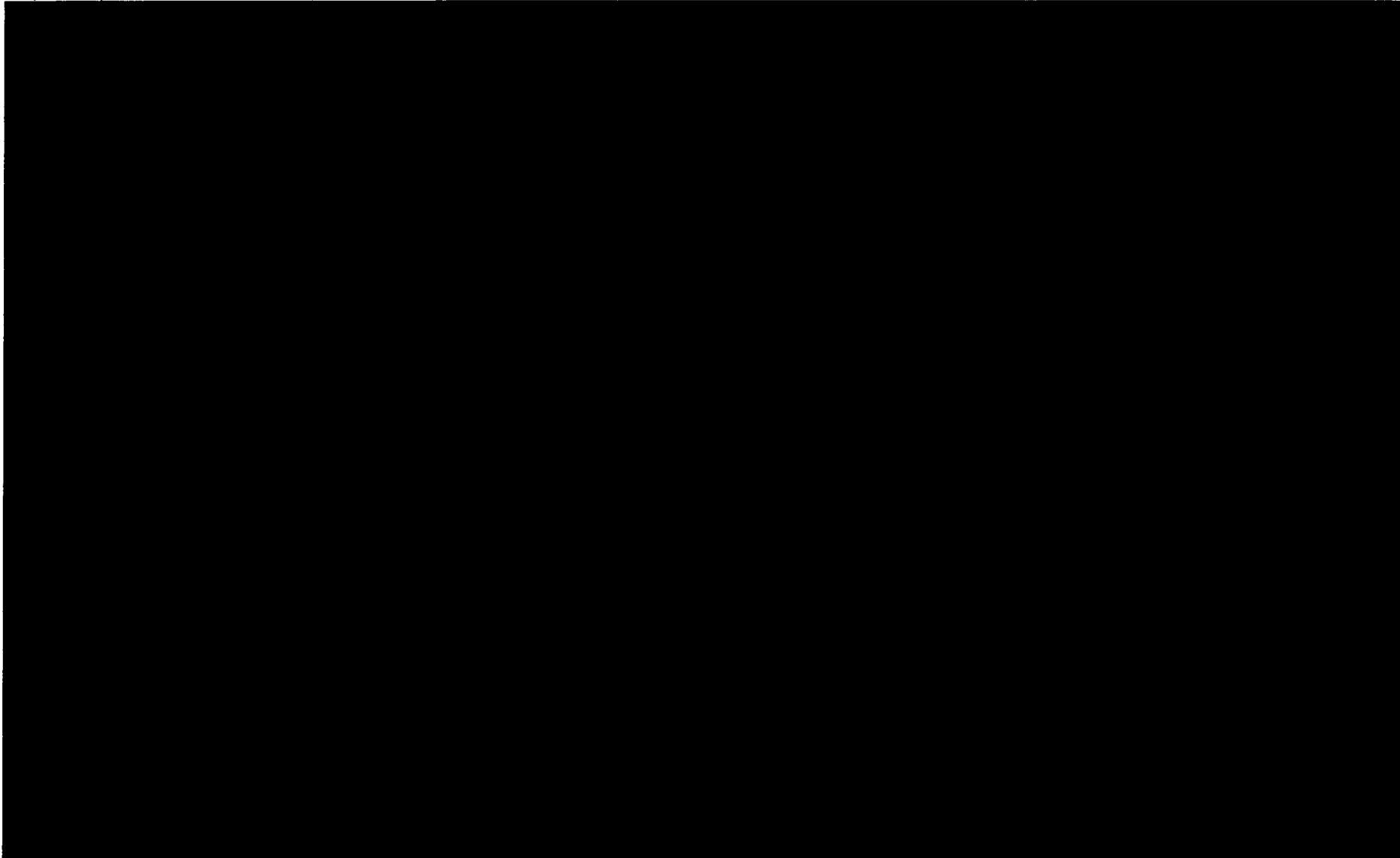
Initiative Status



PEF Capital Project Status - Major Projects

(\$ in millions)

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Technical Analysis Update – Decommissioning

- Work necessary to maintain containment building in safe shutdown condition for 42-year period would be deferred and presented for recovery in 2017
 - Stabilization of the containment building = [REDACTED]
 - Completion of the Independent Spent Fuel Storage Installation (ISFSI) project = [REDACTED]
 - Potential NRC-required, post-Fukushima modifications (e.g., additional fuel pool monitoring equipment, flooding/seismic and station black-out modifications) = [REDACTED]

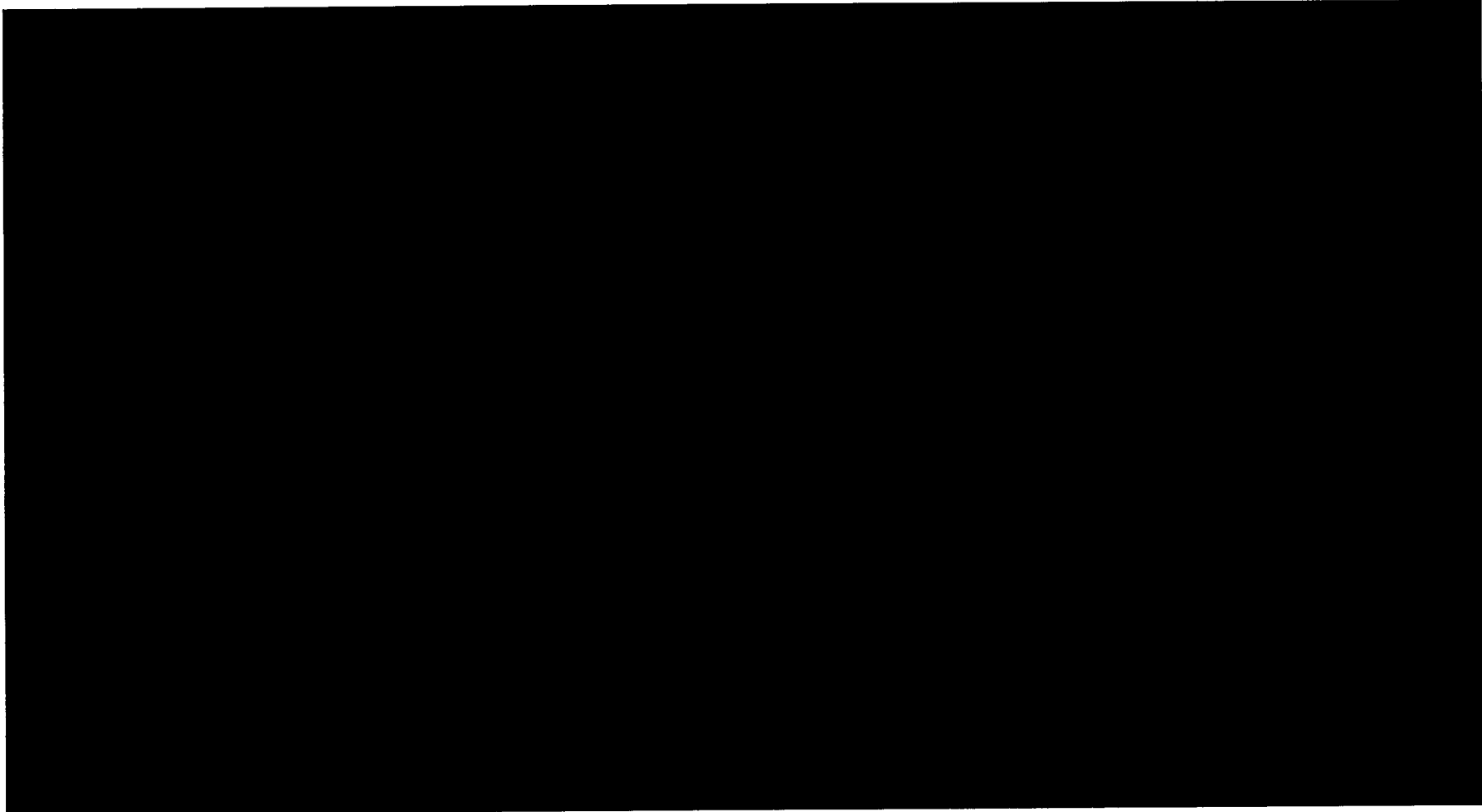
- Decommissioning Trust Funding
 - Under SAFSTOR option, no additional decommissioning trust funding needed

- Staffing
 - Permanent staffing must meet operational and emergency planning requirements
 - Benchmarked Zion unit shutdown staffing plan
 - In first 2 years, reduce staff by approximately 50%
 - By year 7, if ISFSI implemented, minimum staffing can be achieved
 - Required activities limited to security and periodic monitoring of ISFSI
 - Severance cost of [REDACTED] would be deferred and presented for recovery in 2017



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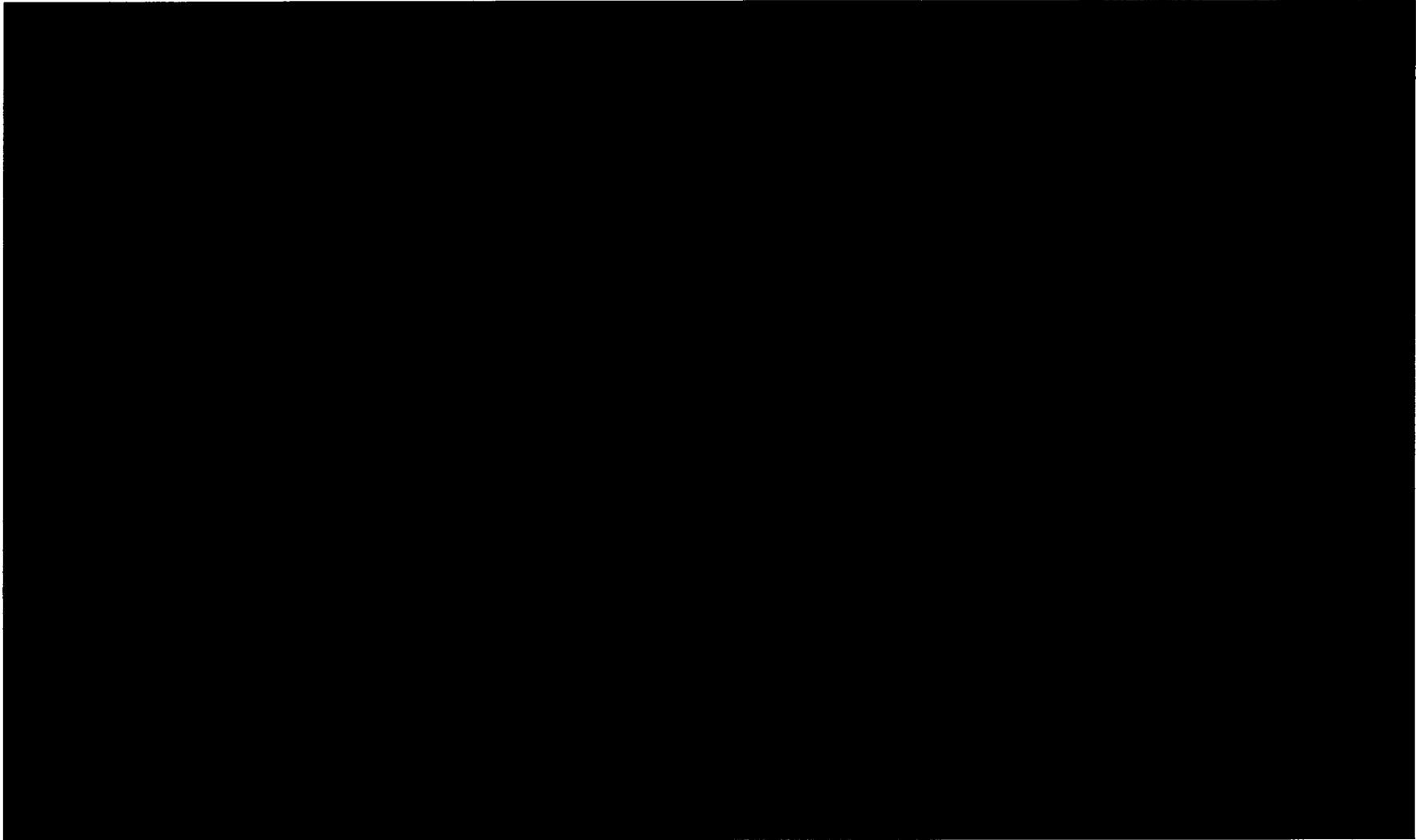
Economics of Repair / Retire for Customers Summary Results





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Economics of Repair / Retire for Customers – Full NEIL Recovery Scenario¹





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Regulatory Process

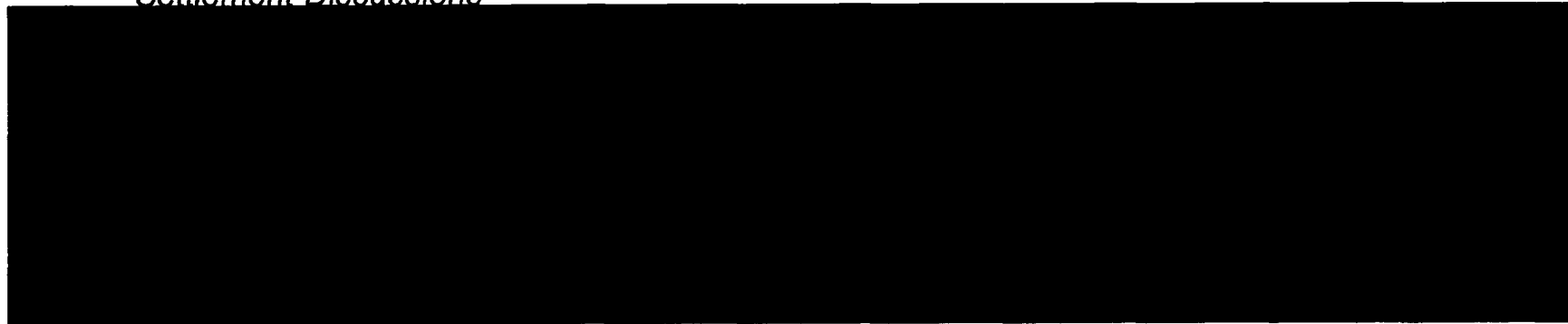
■ Delamination Docket Issues

- With a retirement announcement, FPSC CR3 delamination docket Phase II would become ripe
- DEF would likely file a petition and testimony in February, with possible hearing in April
- Prudence of Company's decision to retire CR3 would be reviewed
 - Signatories to settlement barred from challenging prudence
 - Other non-signatories who establish standing could challenge prudence
- Likely claim that any NEIL settlement, if approved, is imprudent, arguing that PEF should have pursued arbitration

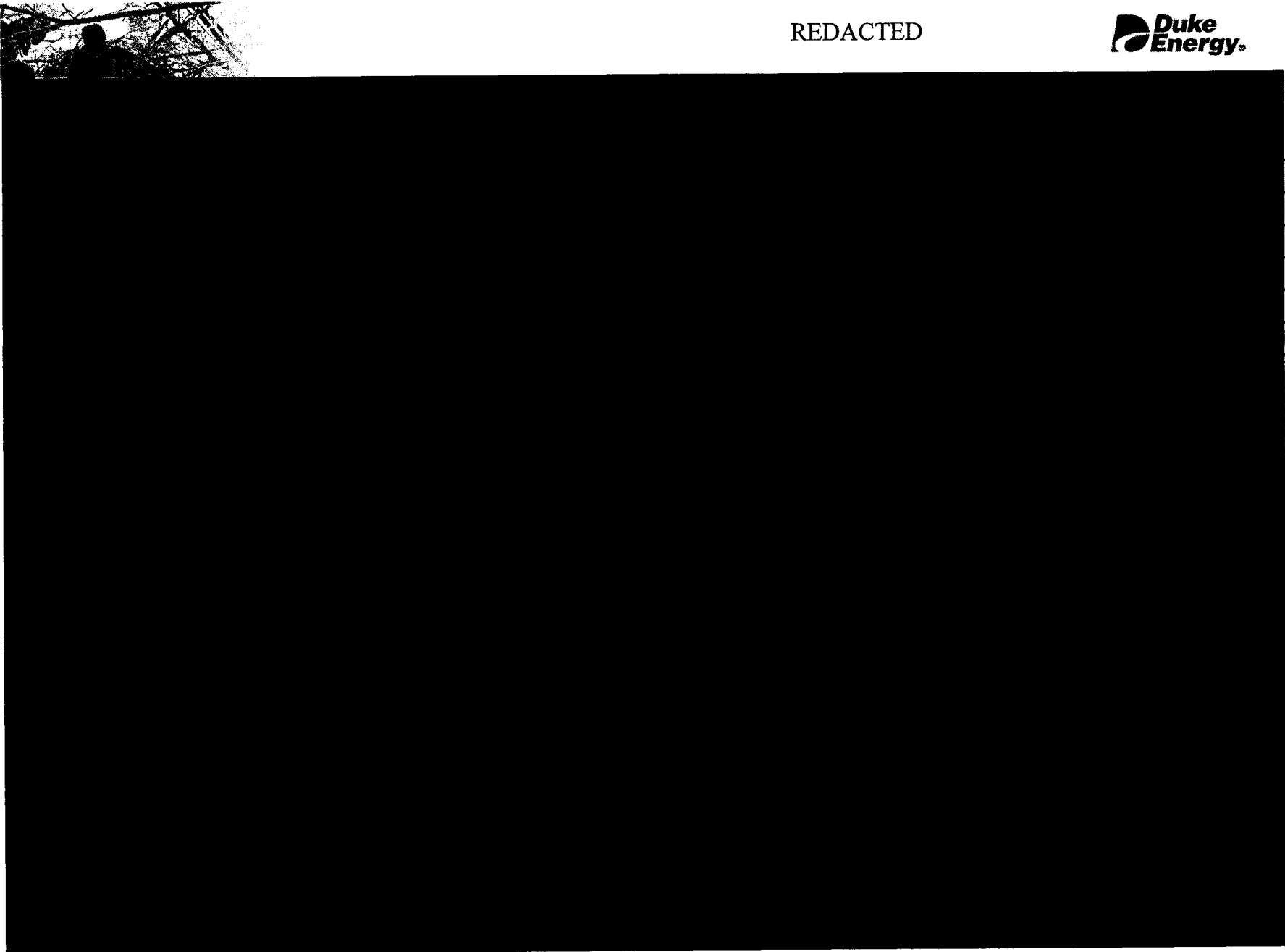
■ Nuclear Cost Recovery Clause Docket Issues

- March 1, 2013, filing indicating that the Company has cancelled the CR3 extended power uprate project
- May 1, 2013, filing regarding reasonableness and prudence of EPU termination costs (or deferral of this issue until Commission determines prudence of CR3 retirement issue)
- NCRC provisions provide recovery under abandonment provisions
- Under current schedule, customer collection of EPU costs would begin in 2014

■ Settlement Discussions



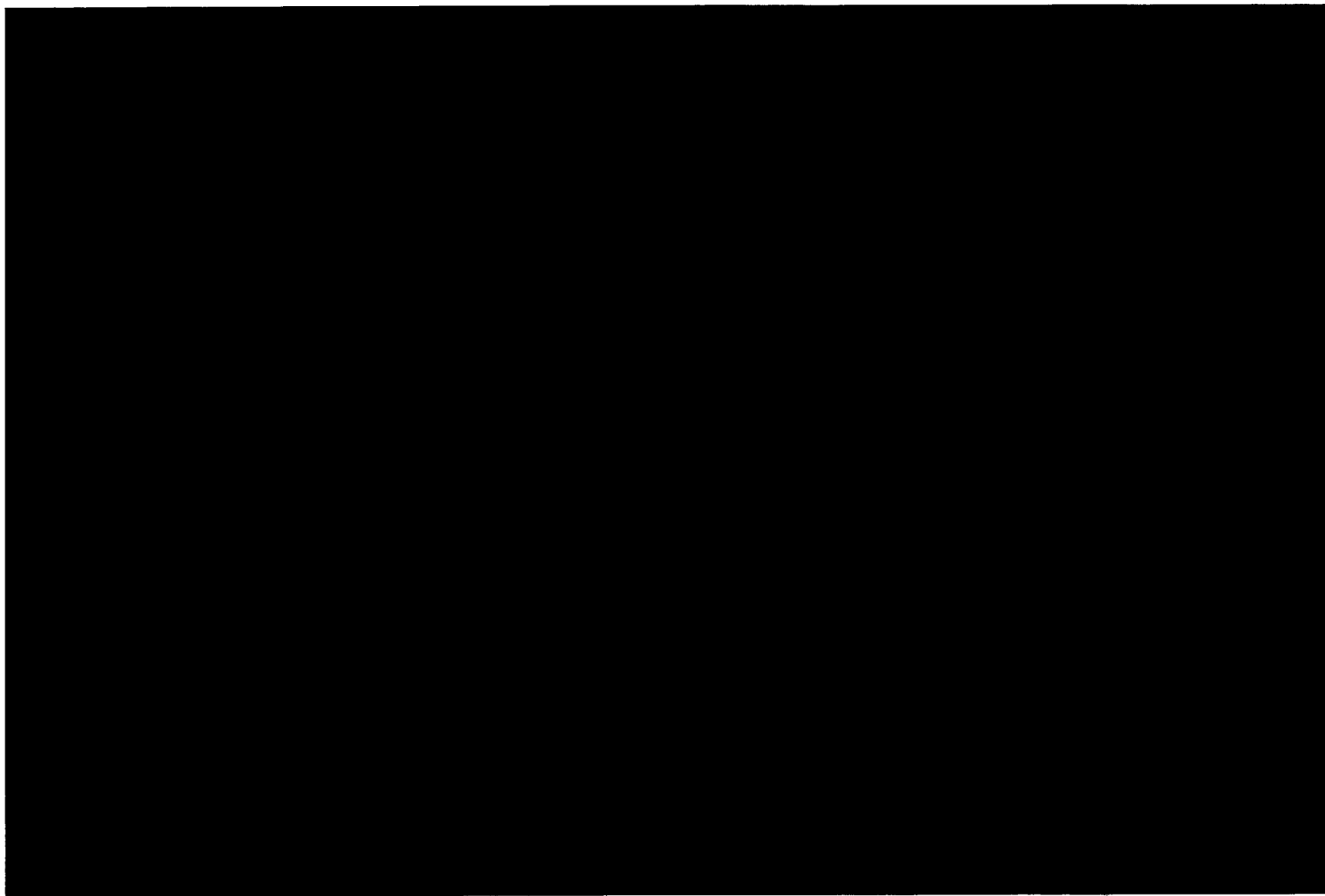
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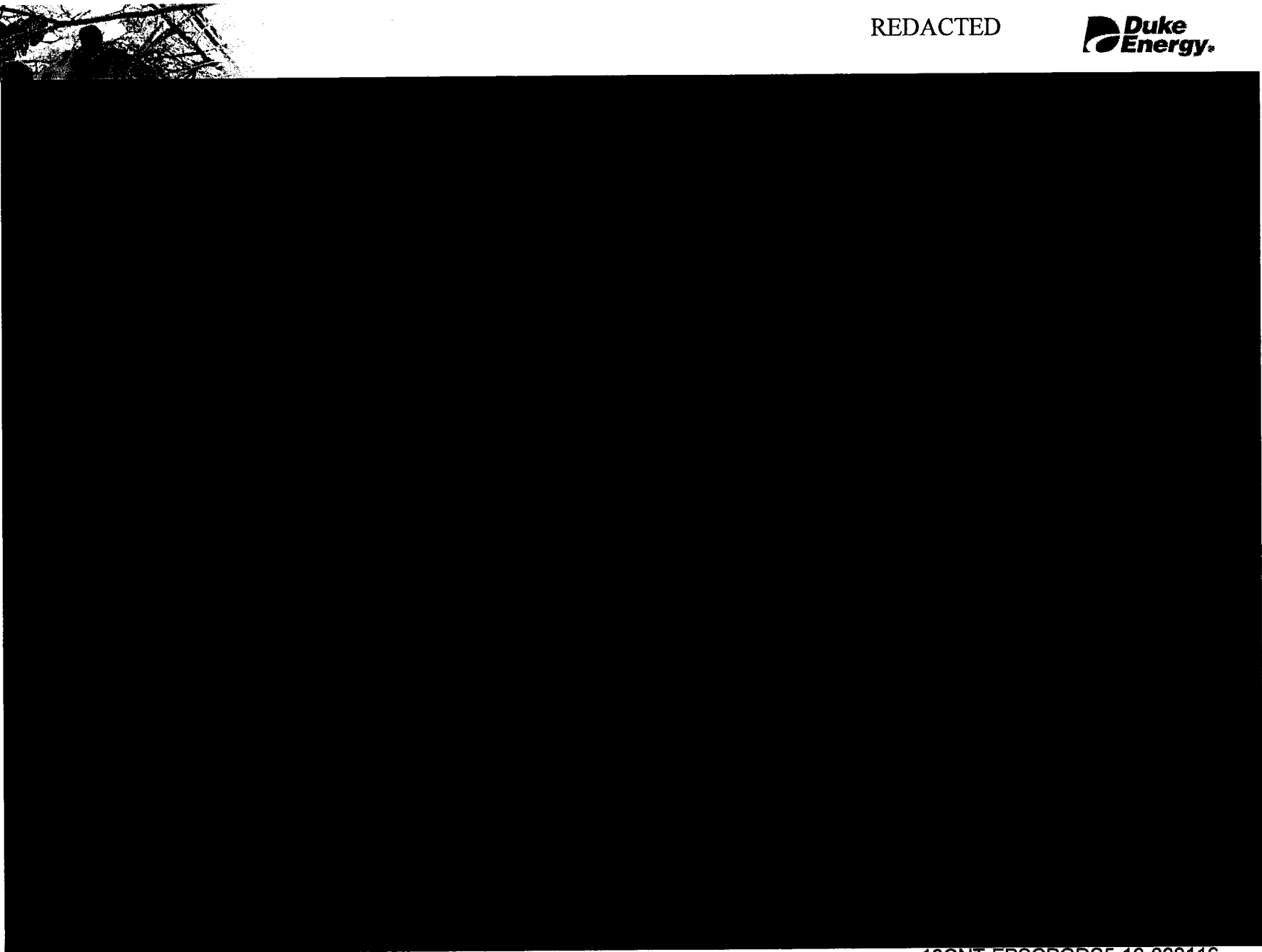
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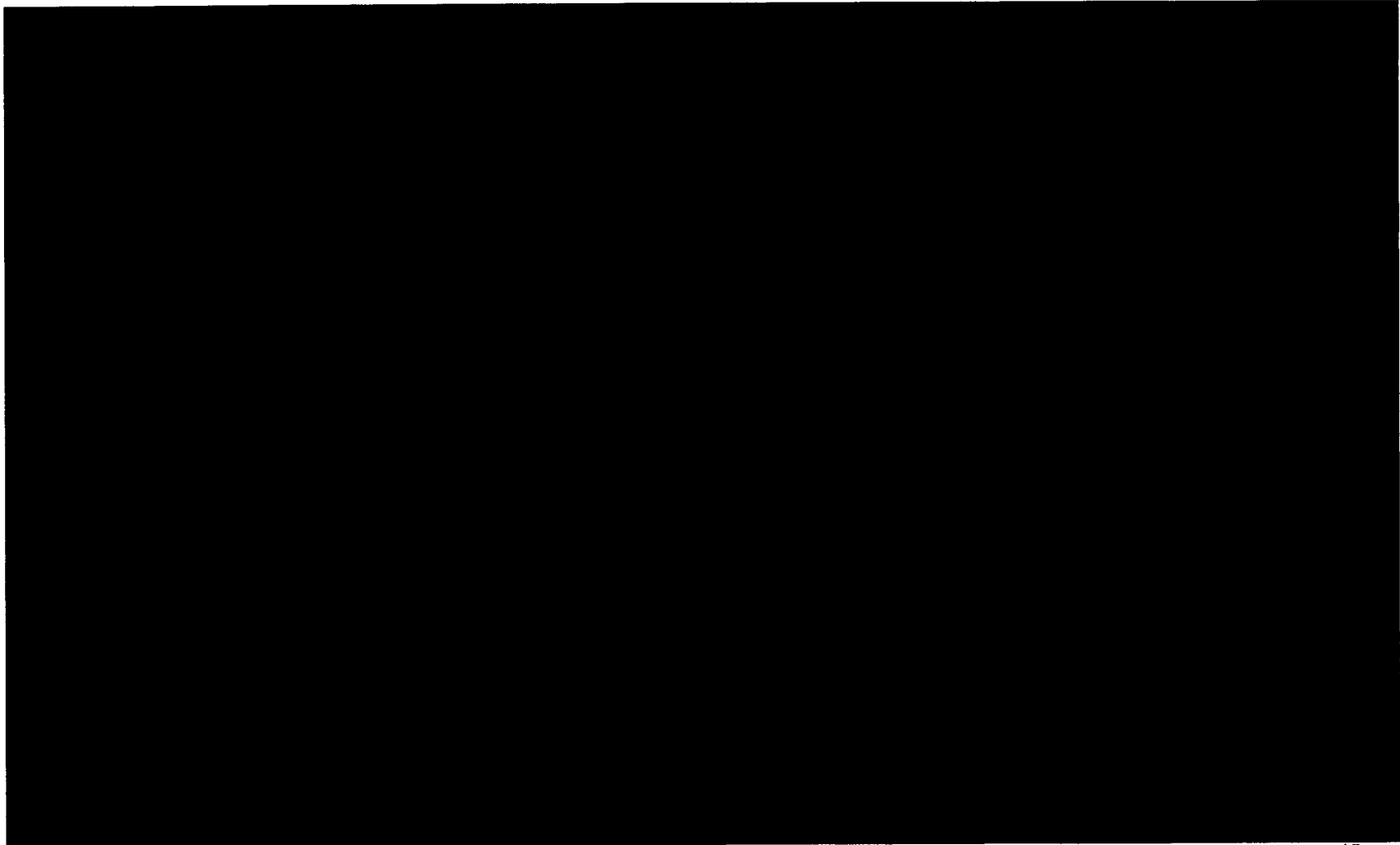


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COMBINING OUR STRENGTHS. CREATING OUR FUTURE.



Financial Scenarios – Executive Summary





Other Considerations

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- Potential disallowance risk
 - Repair cases assume all repair costs not covered under NEIL insurance will be recovered from customers through rates
 - The risk exists that some level of repair costs will not be recovered under NEIL or rates
 - Unrecovered costs would likely result in an impairment charge and a need for additional equity financing to maintain balance sheet position

Financial Takeaways

- Financial results need to be evaluated within the context of risks to customers and shareholders
 - Repair considerations – NEIL recovery and customer impacts are important
 - Retirement of CR3 creates near term earnings challenges and increases capacity needs
- Accounting considerations

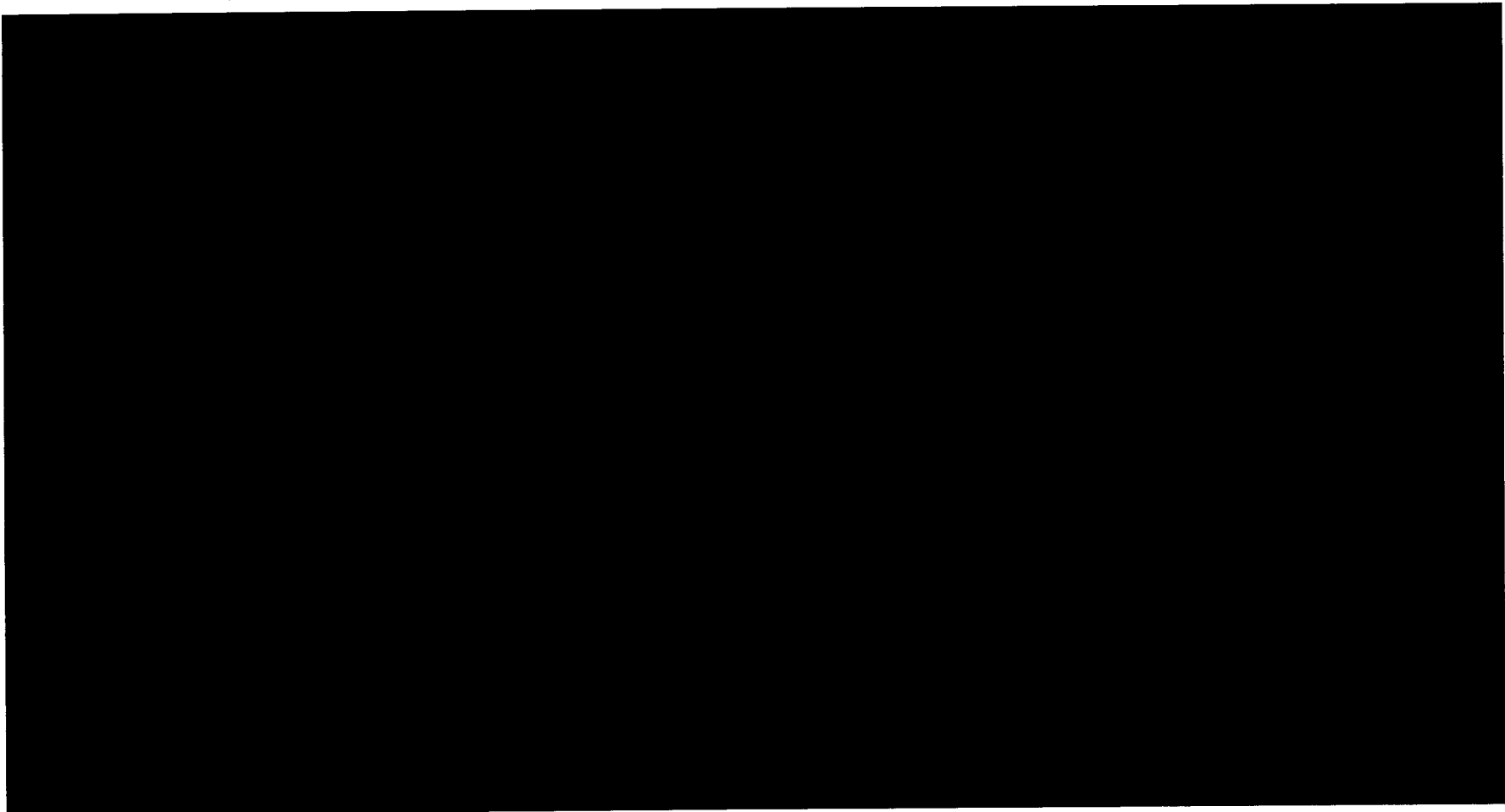
Goodwill analysis under review



Economics of Repair / Retire for Customers

Summary Results

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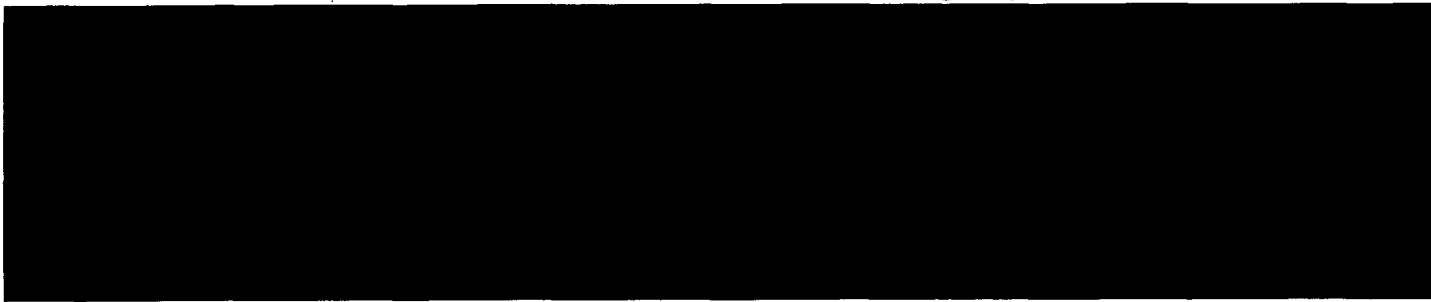




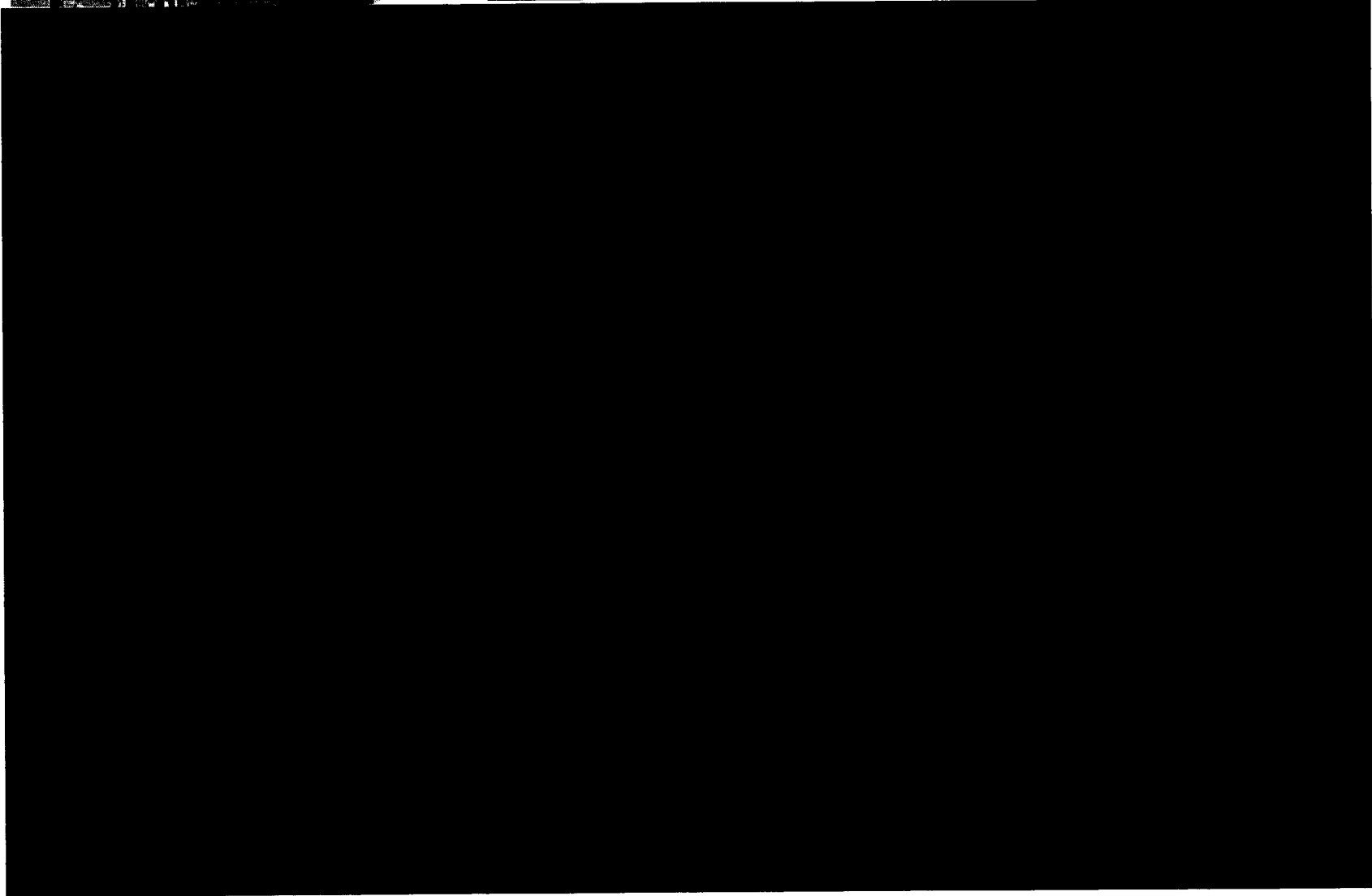
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Key Accounting or Disclosure Issues

- Regulatory settlement approved in February 2012 established framework for cost recovery for repair and retire options
 - Includes a provision for Duke Energy to incur an obligation for \$100 million of replacement power if CR3 repairs do not begin before December 31, 2012
 - If repairs commence before year end, there is no replacement power obligation, even if the plant never returns to service
 - A liability for the \$100 million obligation must be established if we do not believe repairs will begin before year end
- If a decision is made to retire CR3, additional accounting implications include



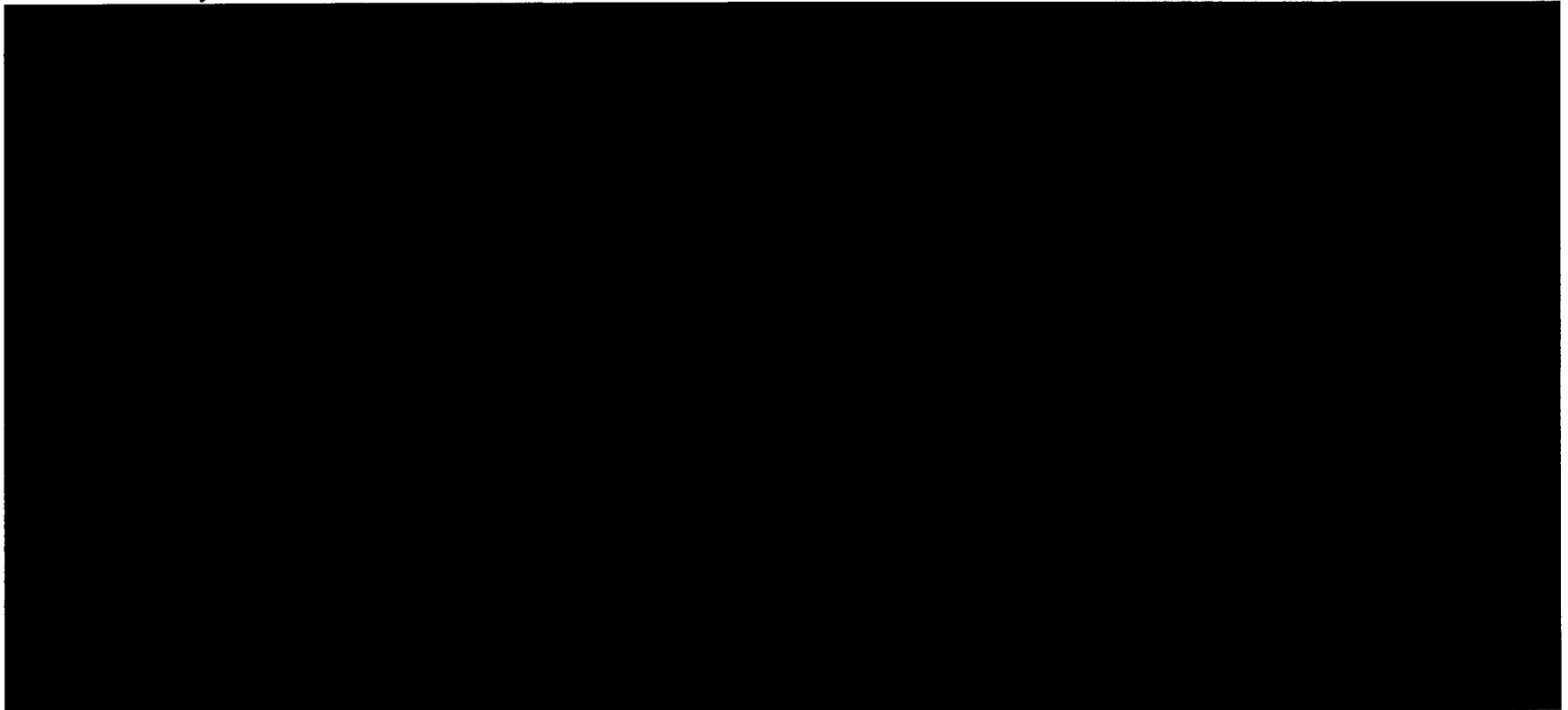
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Economics of Repair / Retire for Customers Summary Results

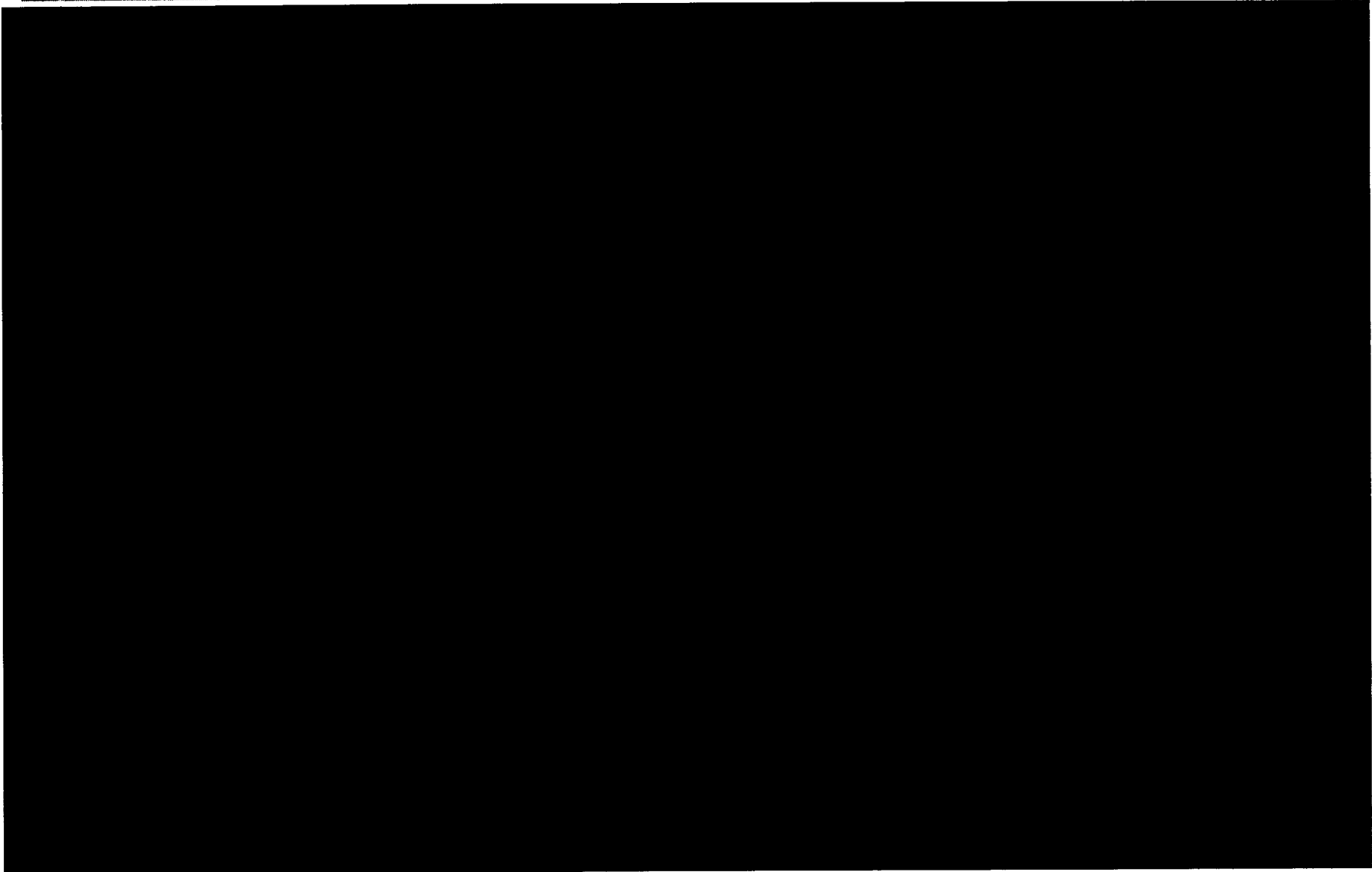
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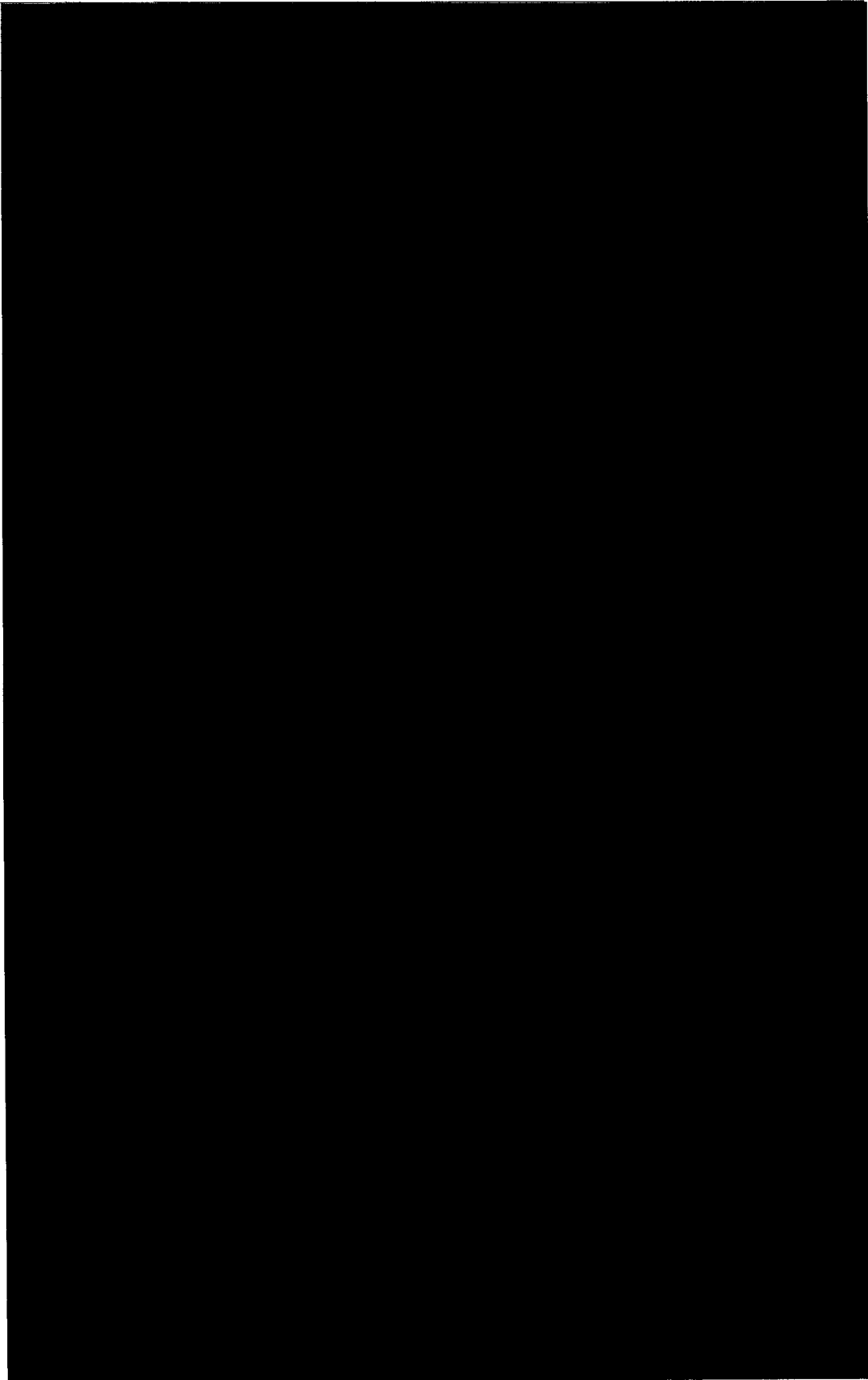
Note: figures exclude joint owner portion



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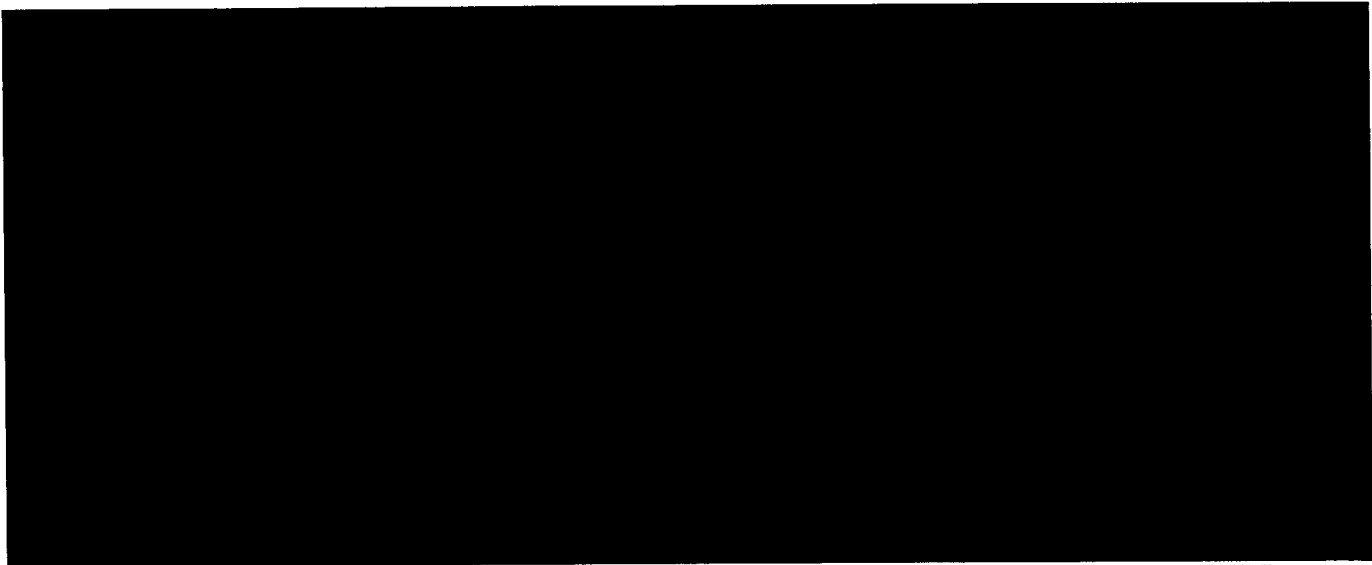


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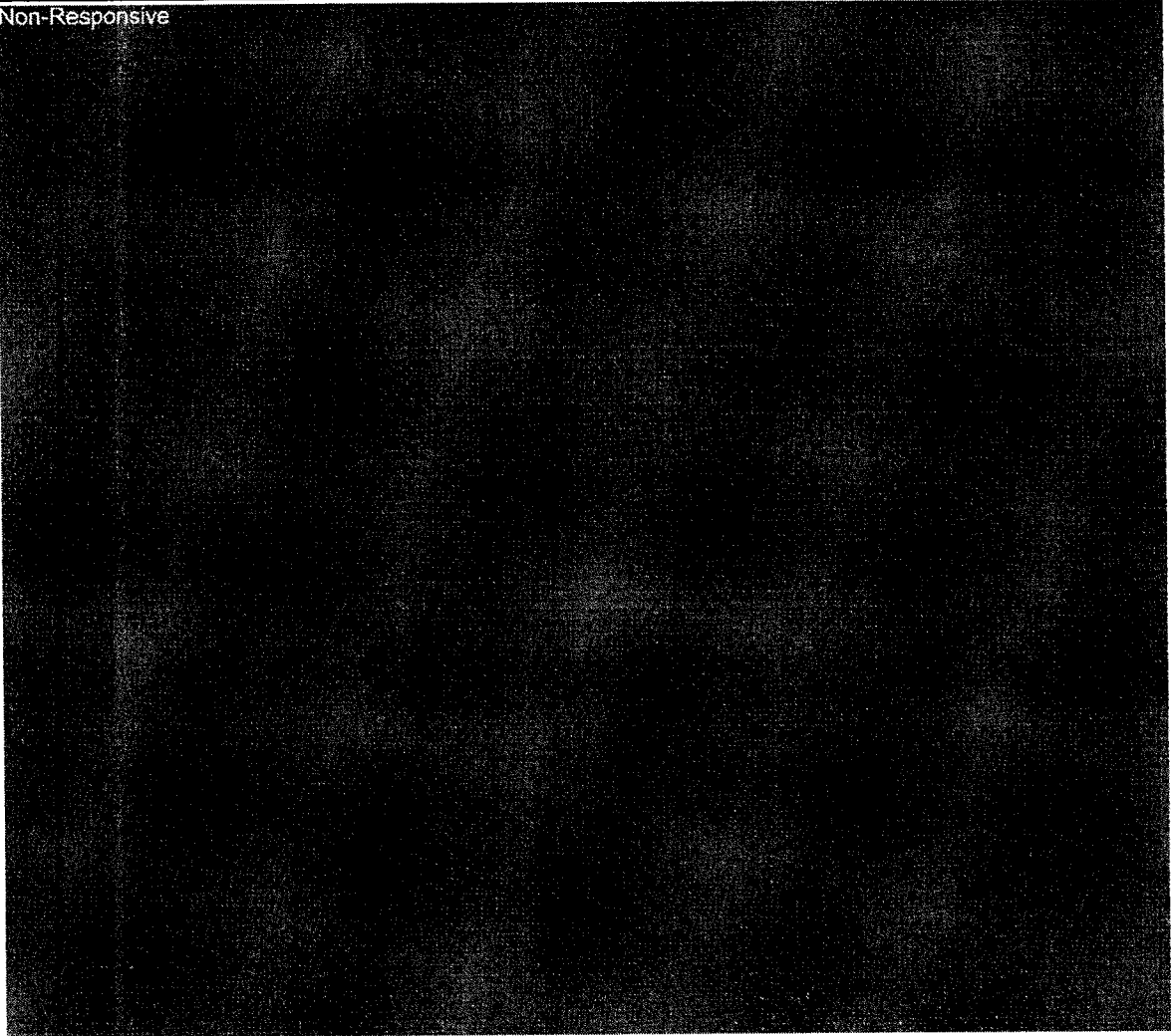


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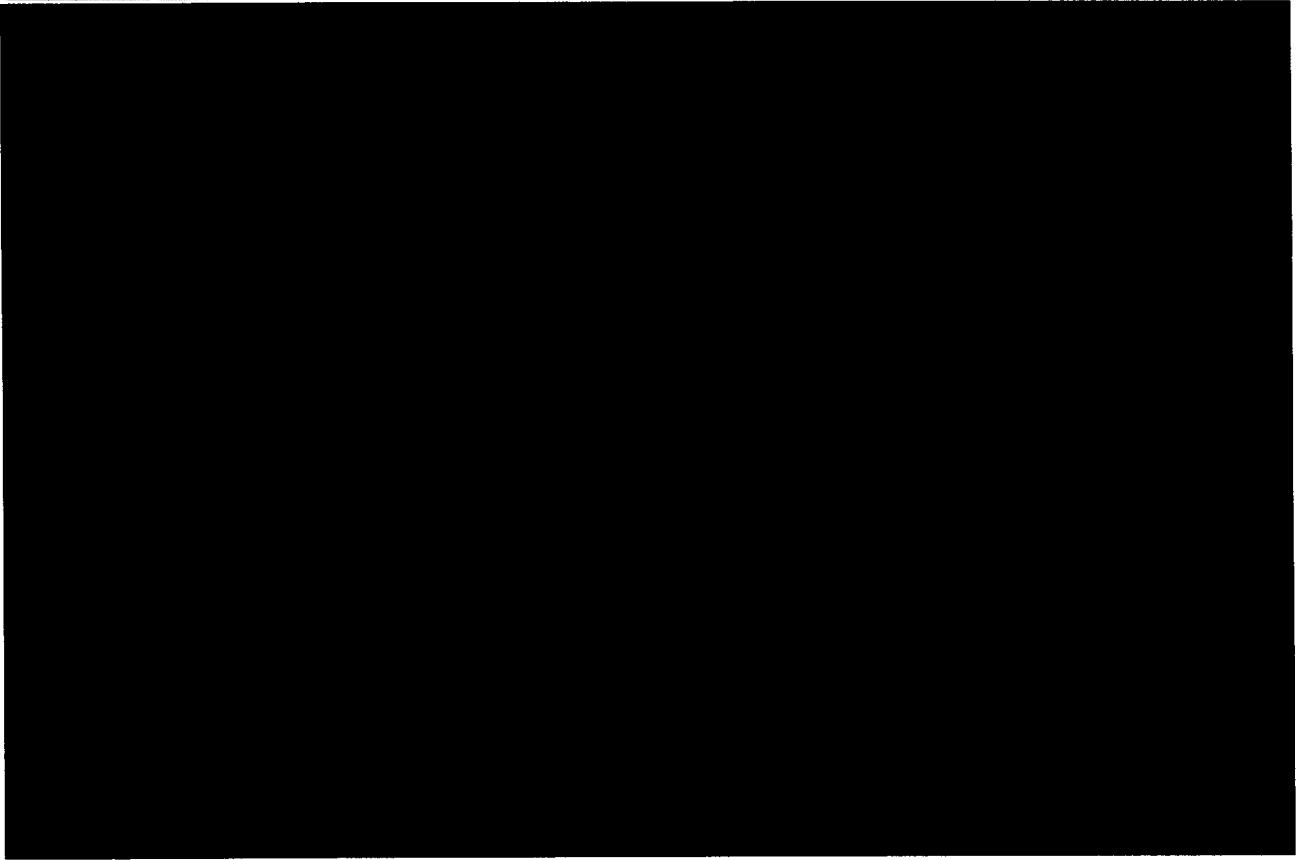
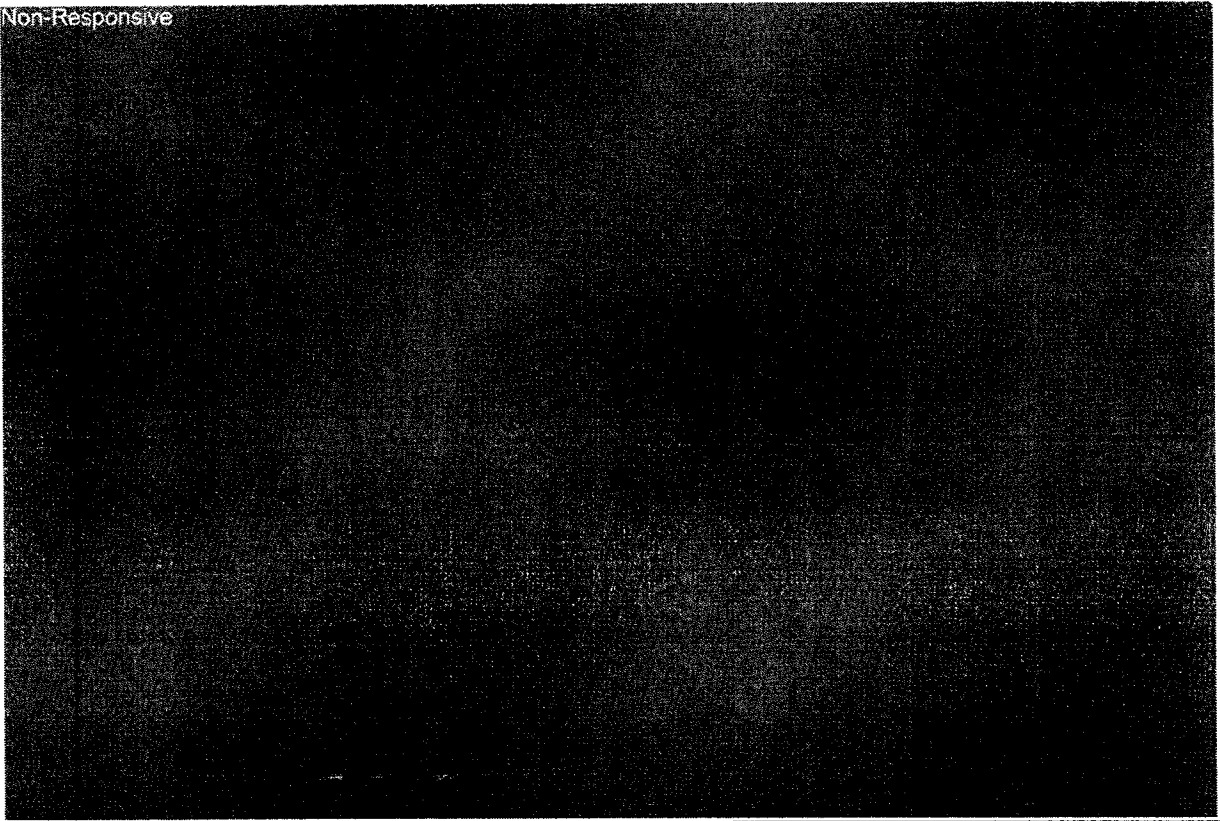


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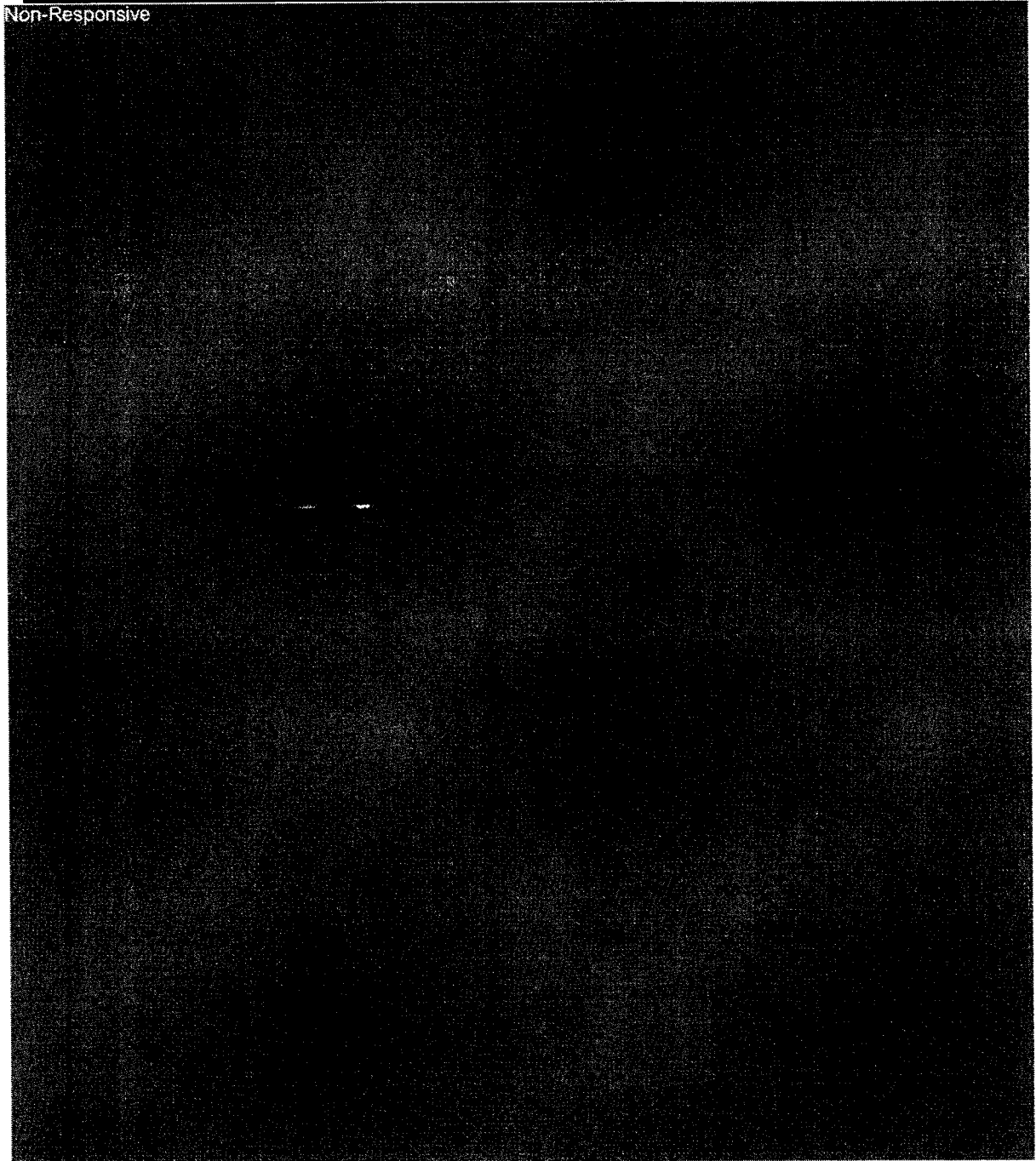


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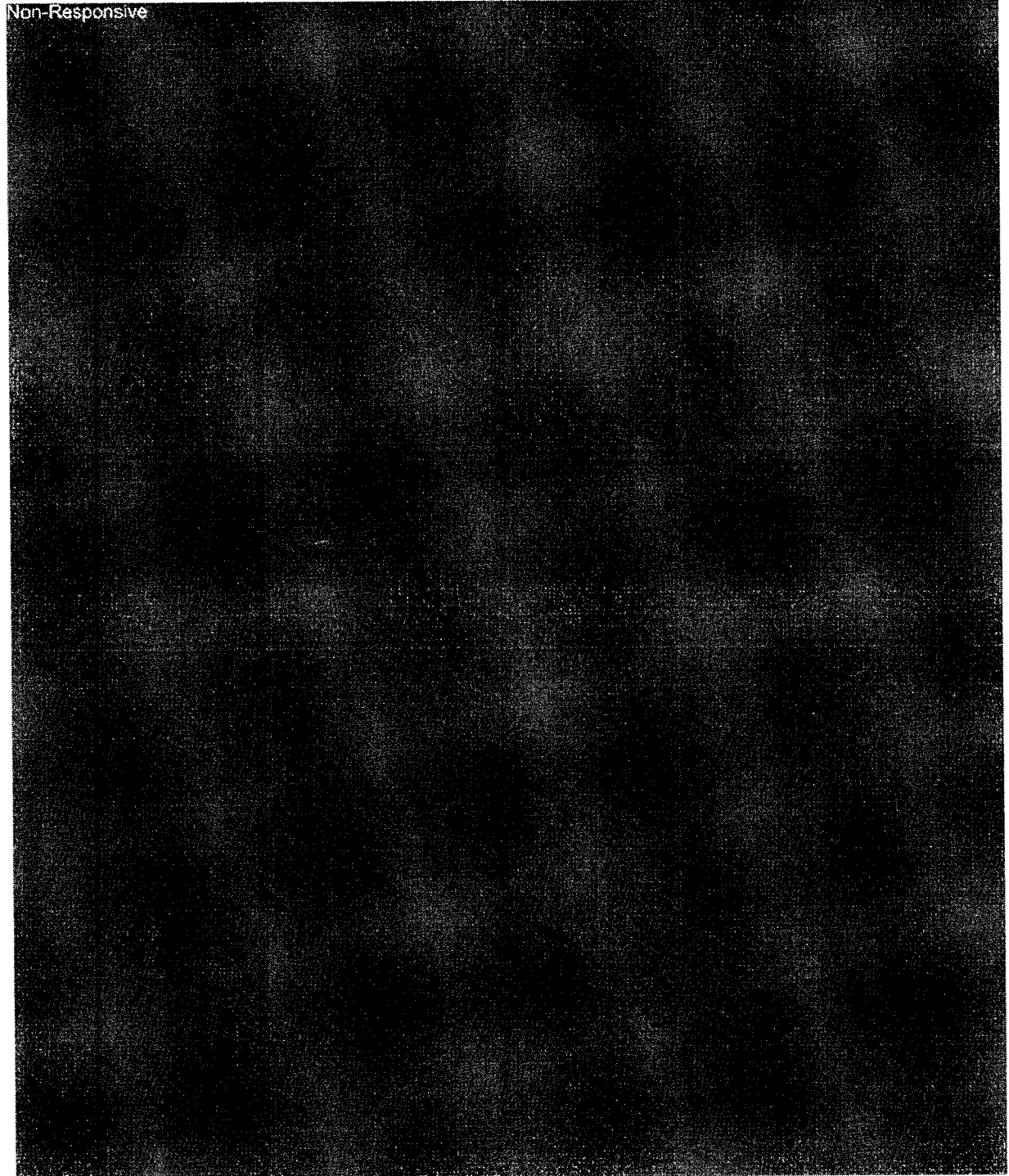


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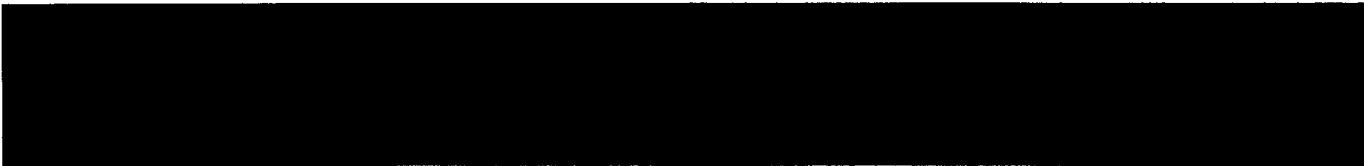


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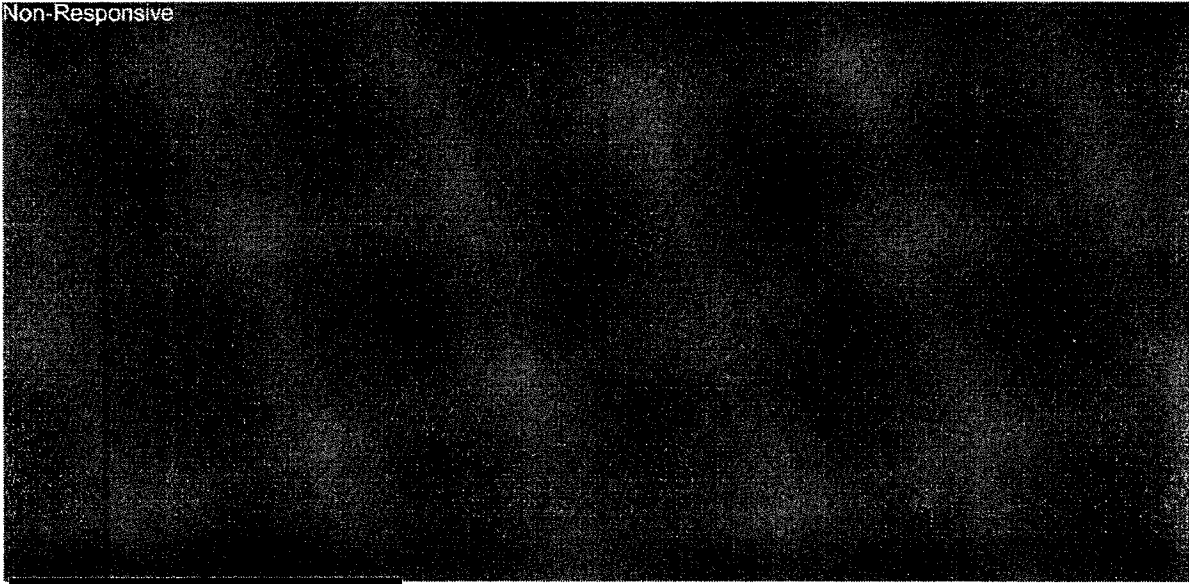
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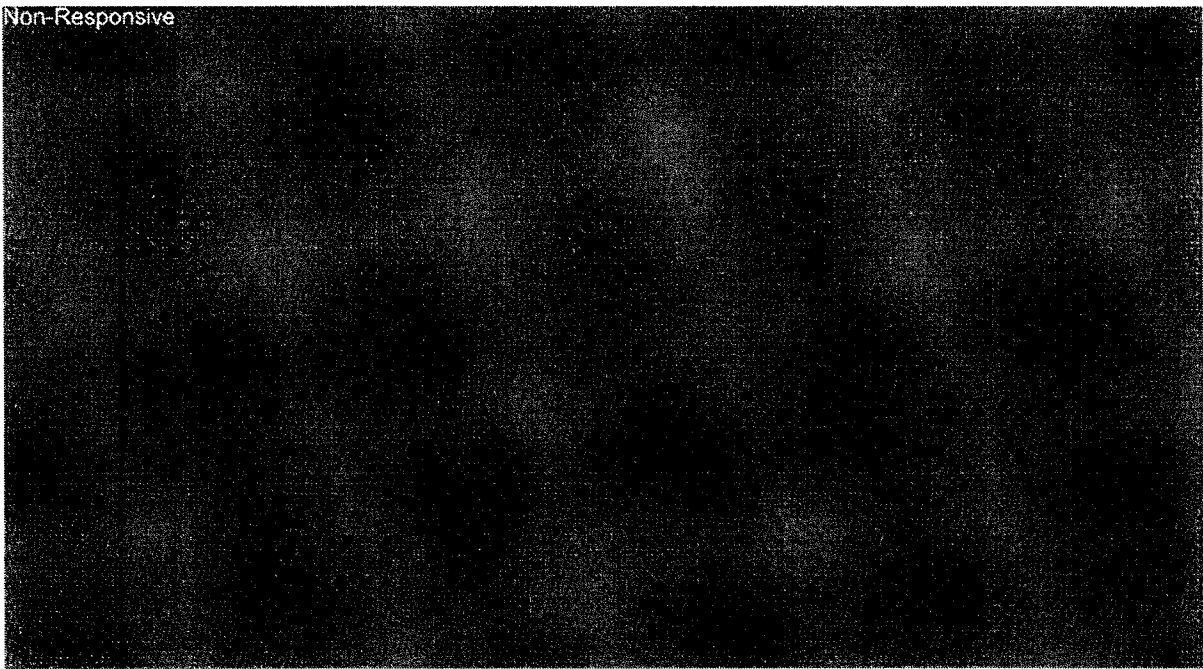
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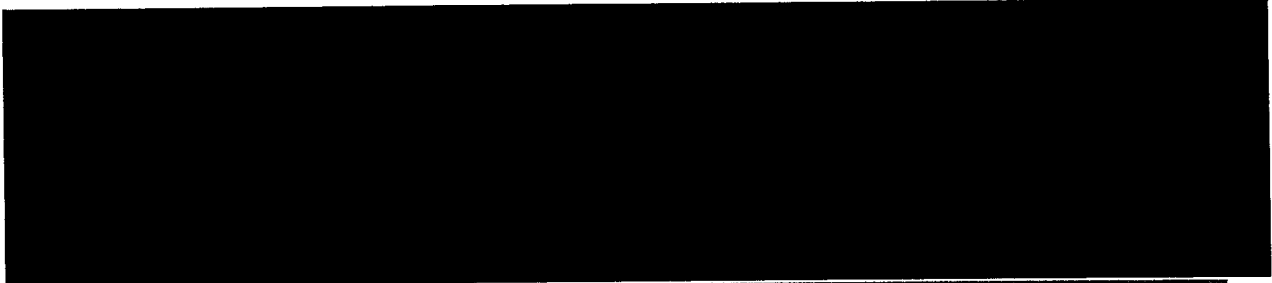
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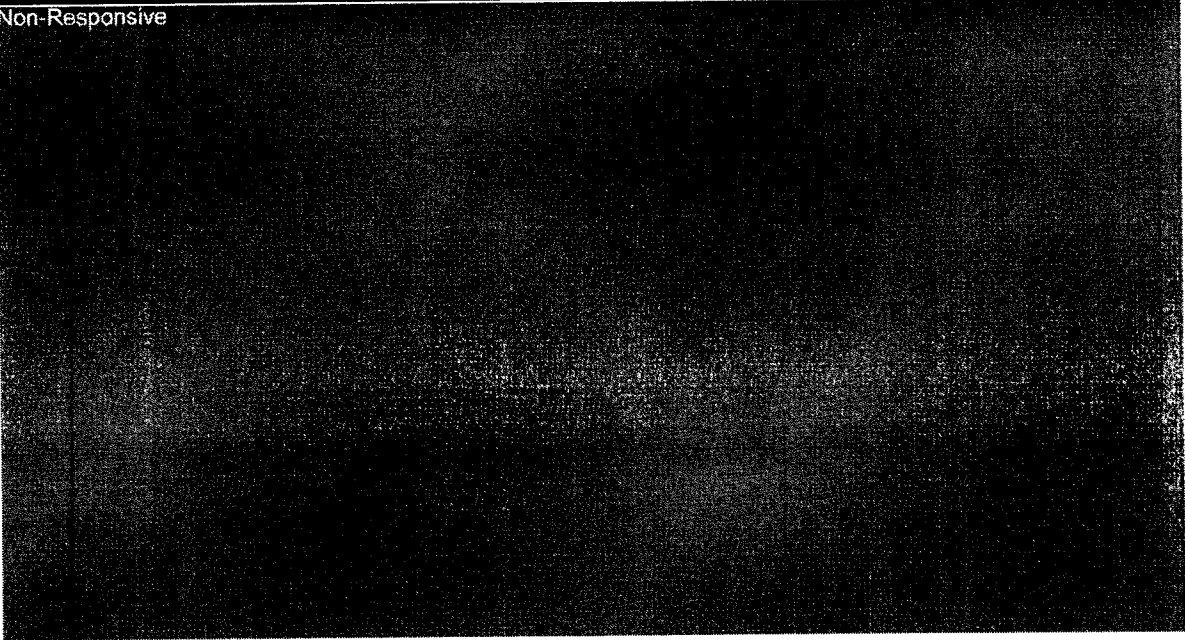
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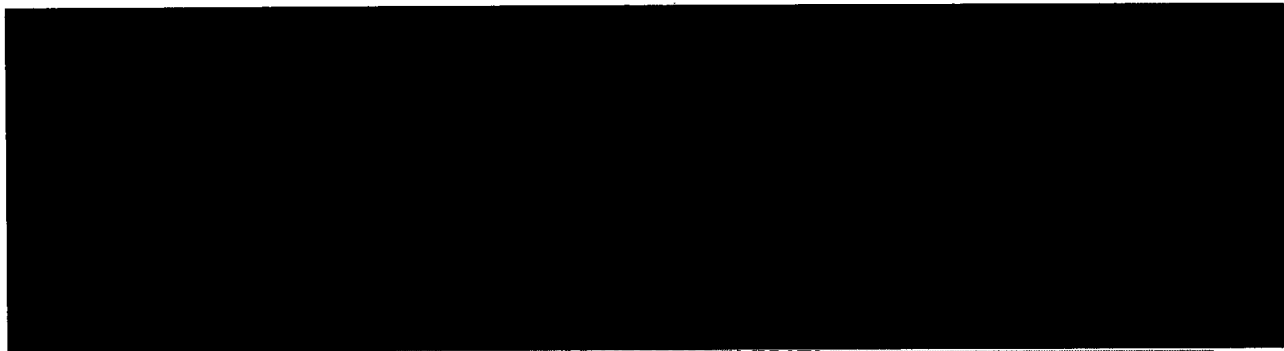


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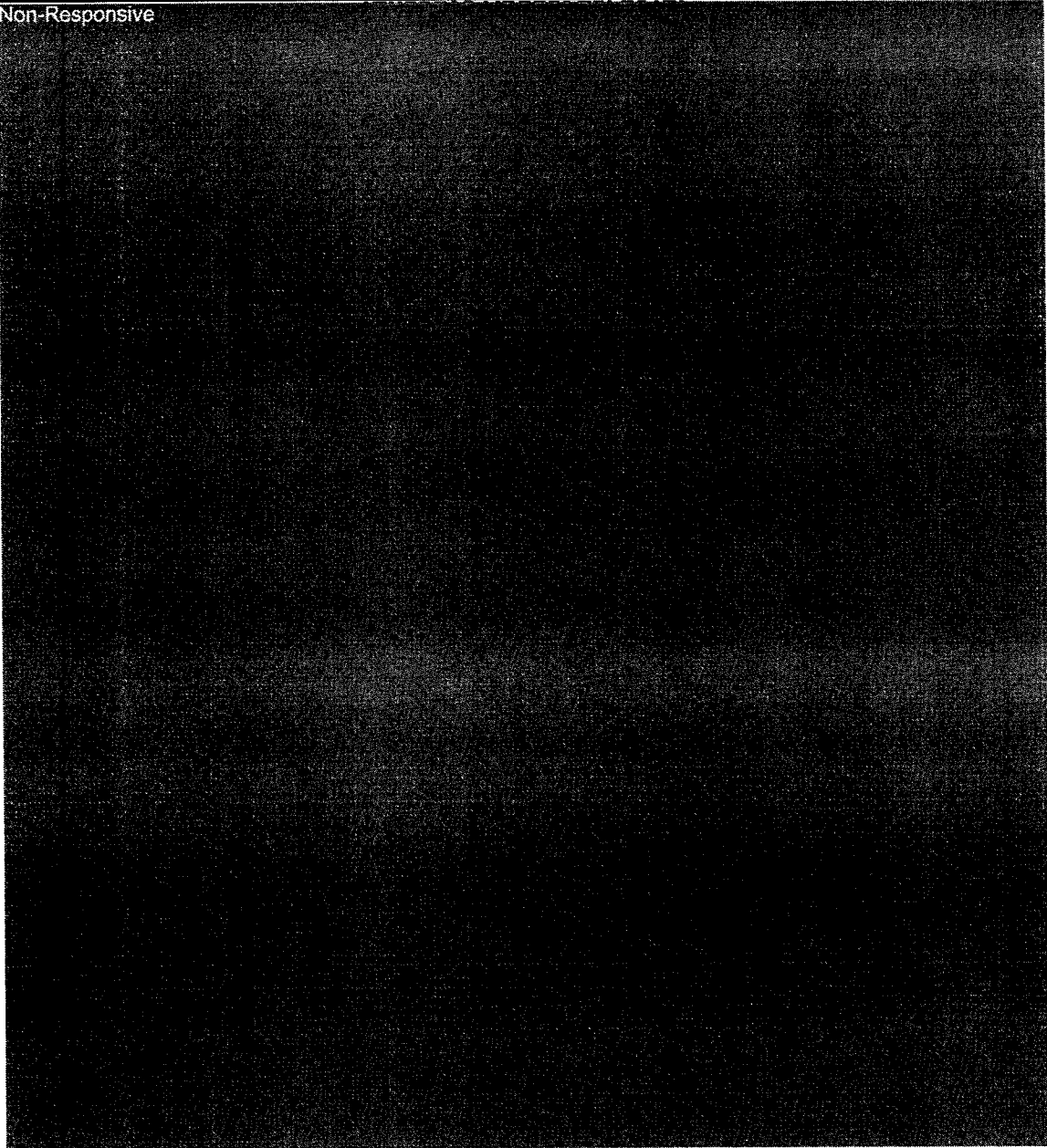


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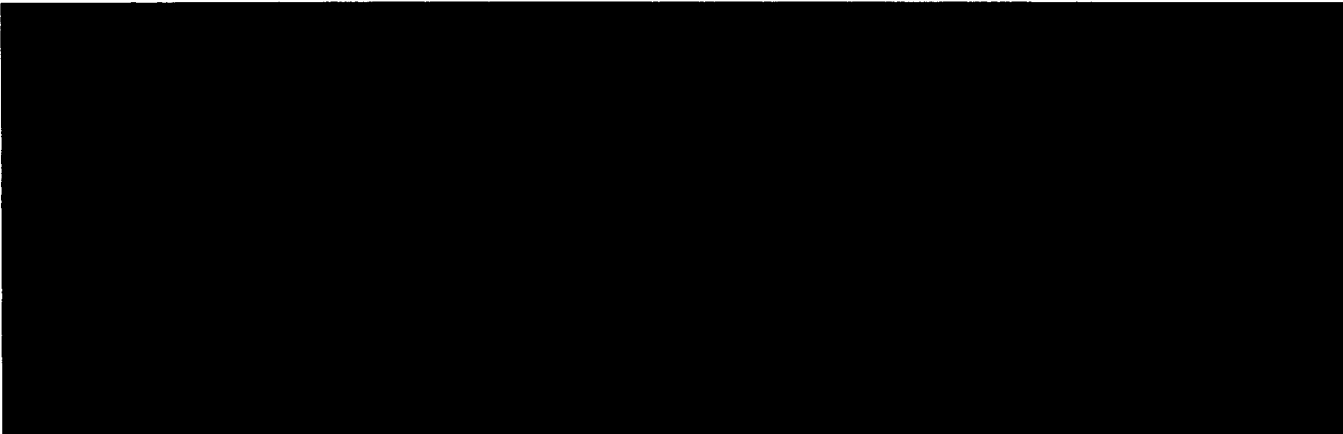


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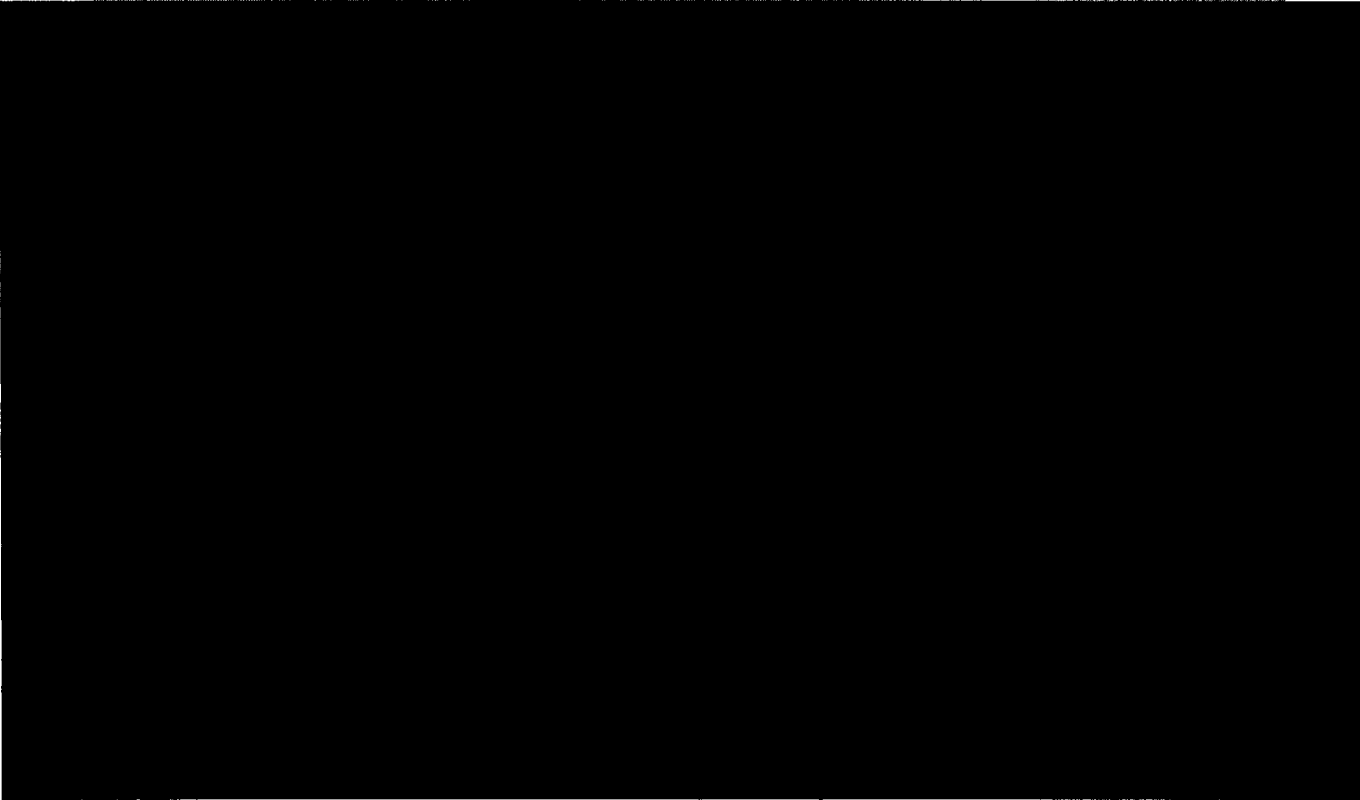


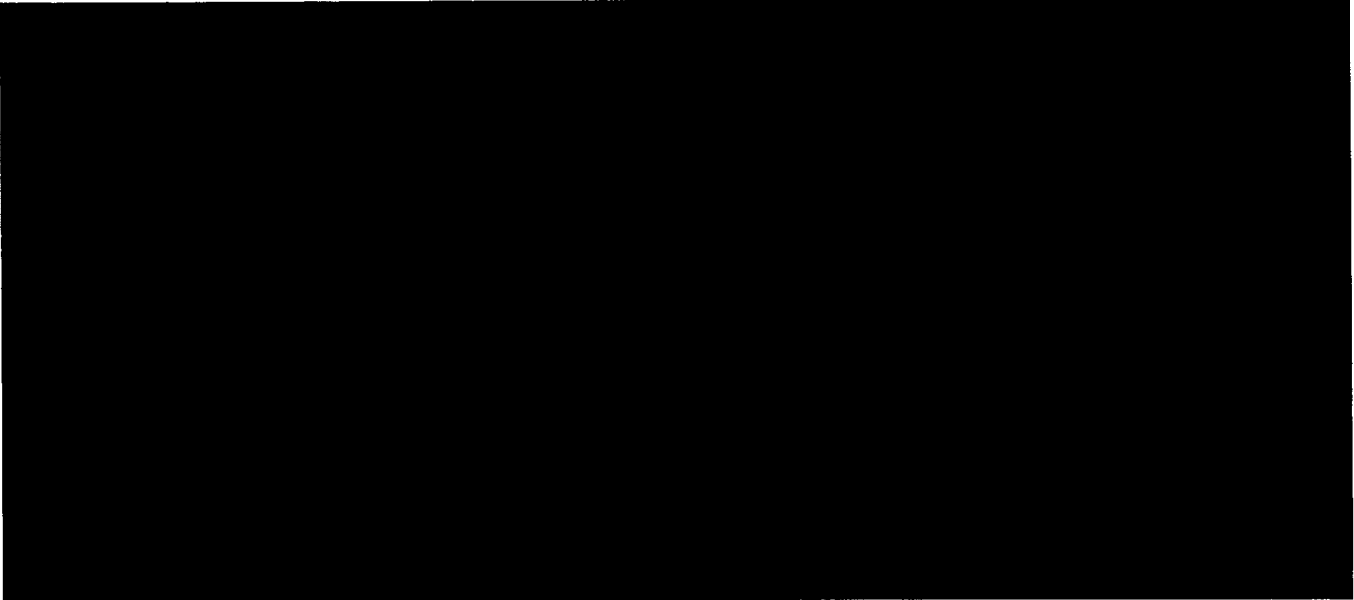
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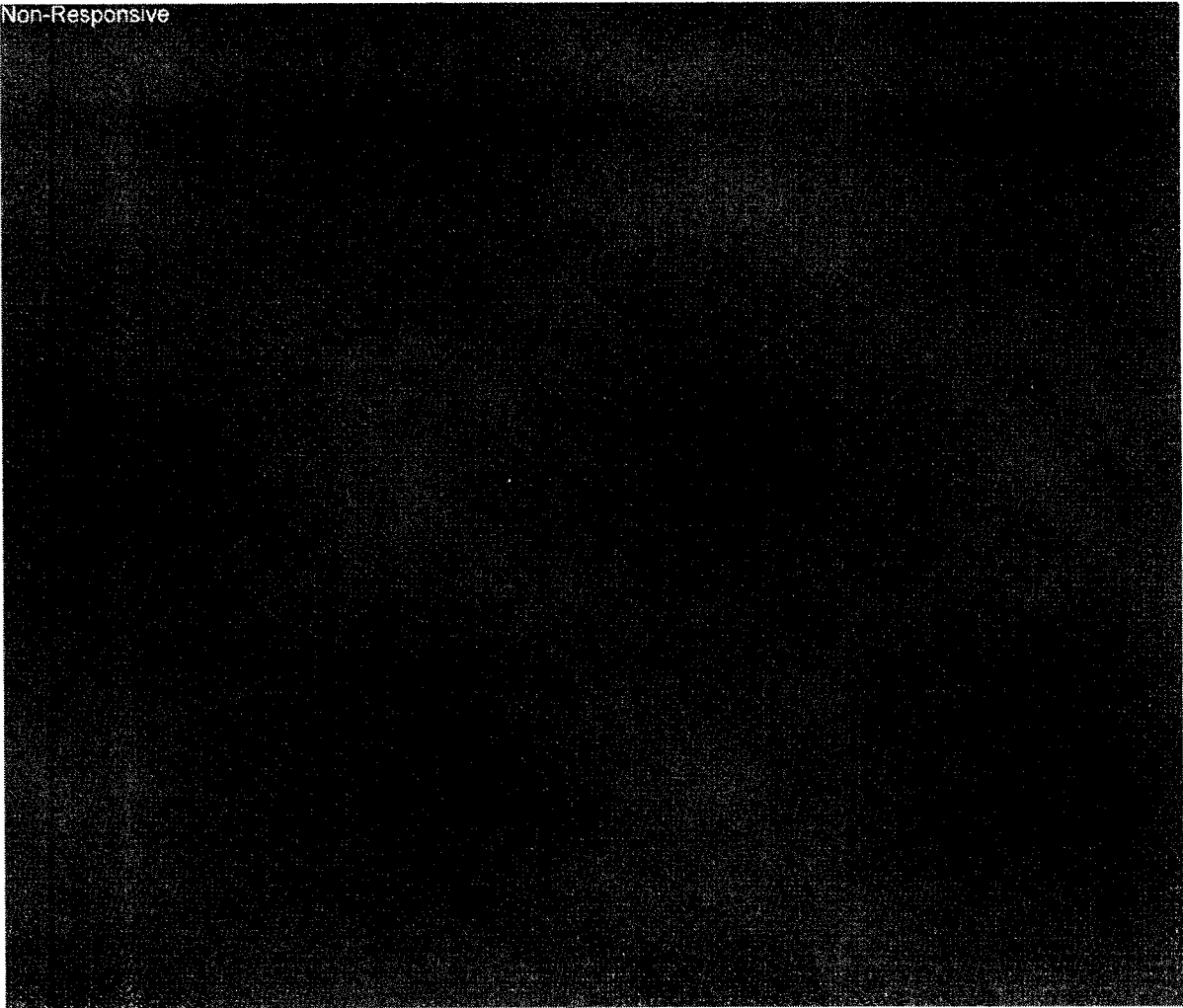


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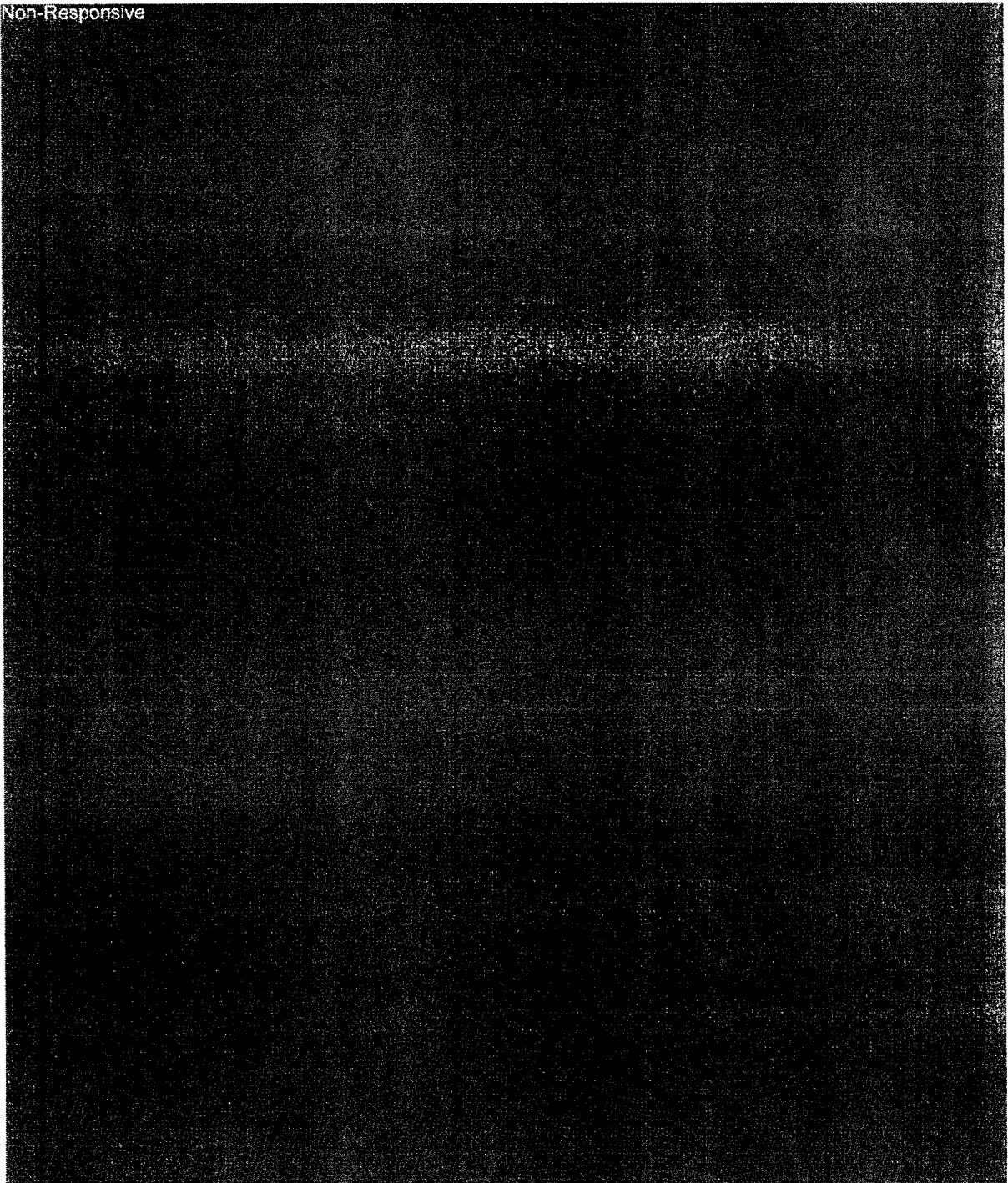
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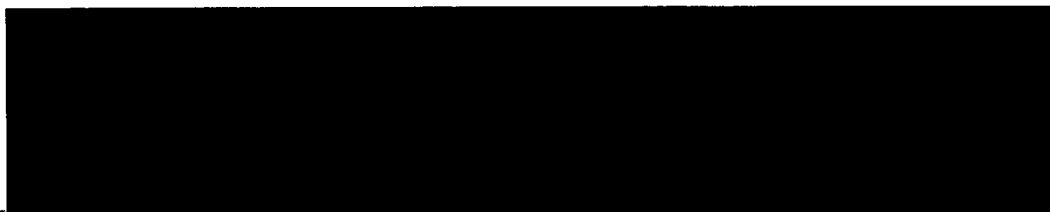


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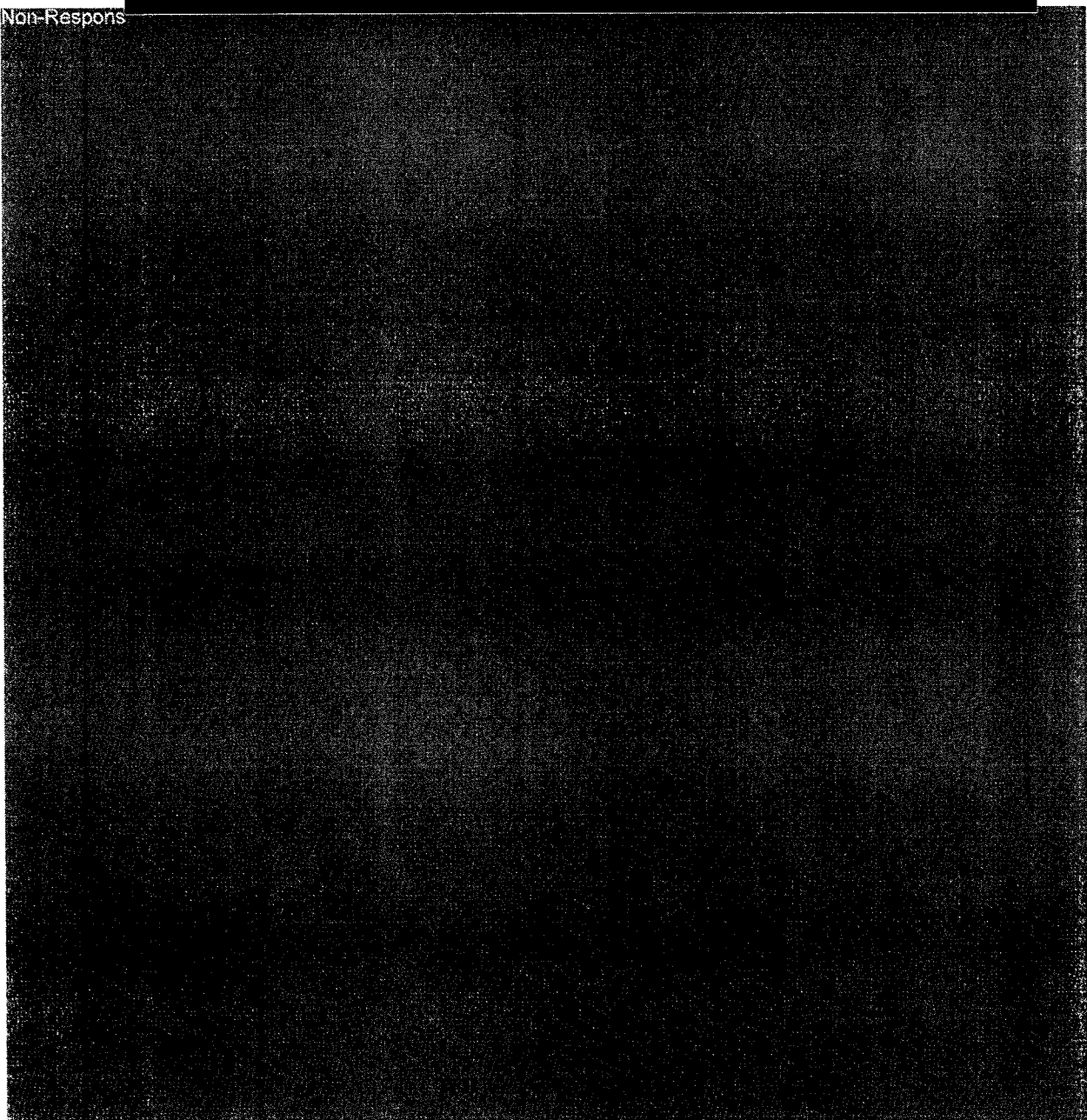


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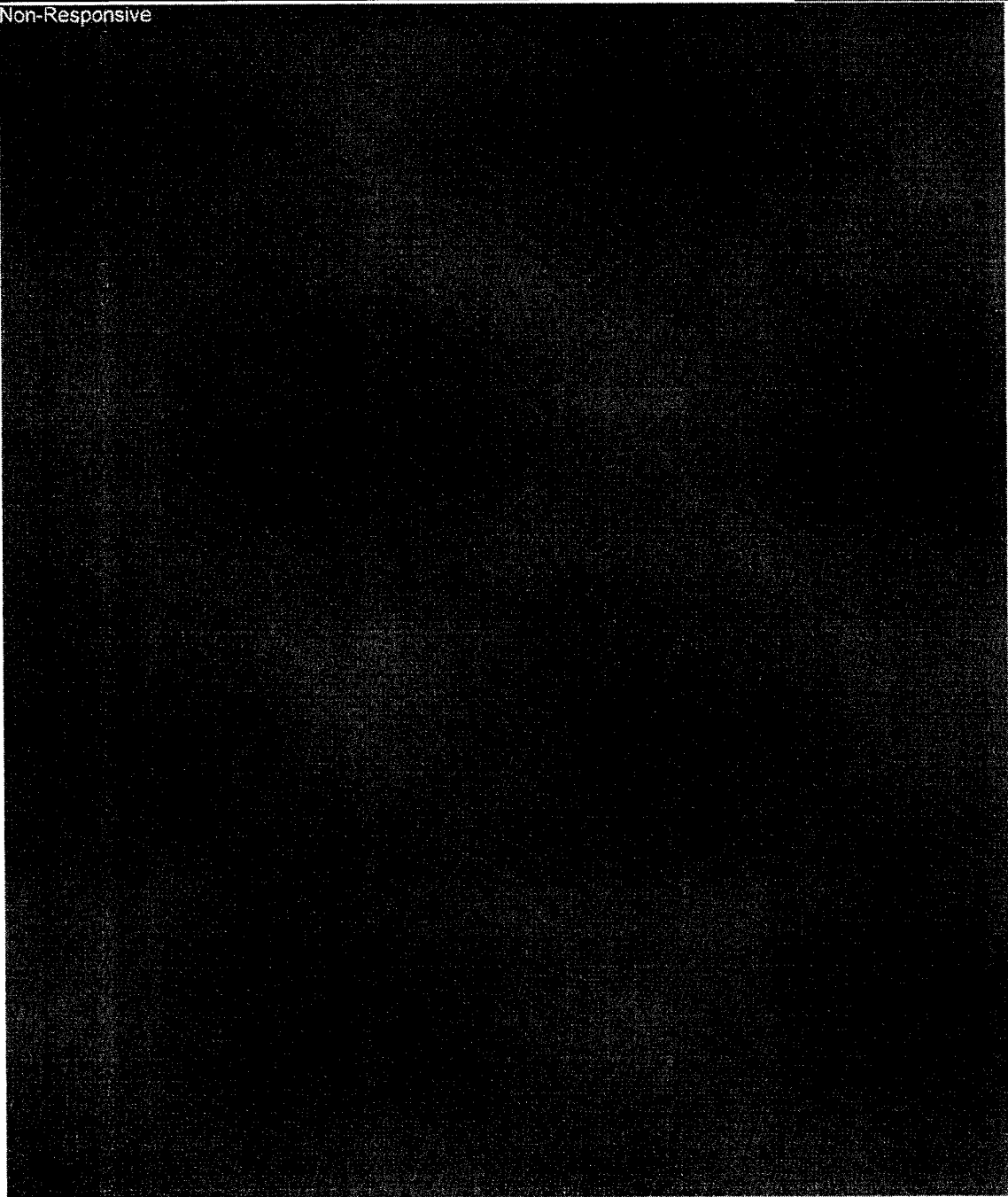
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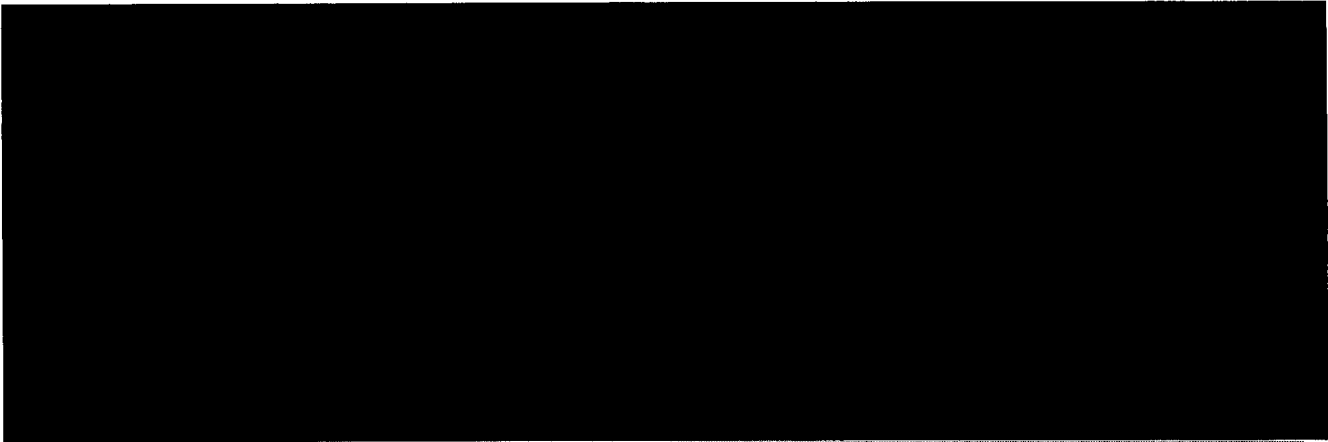
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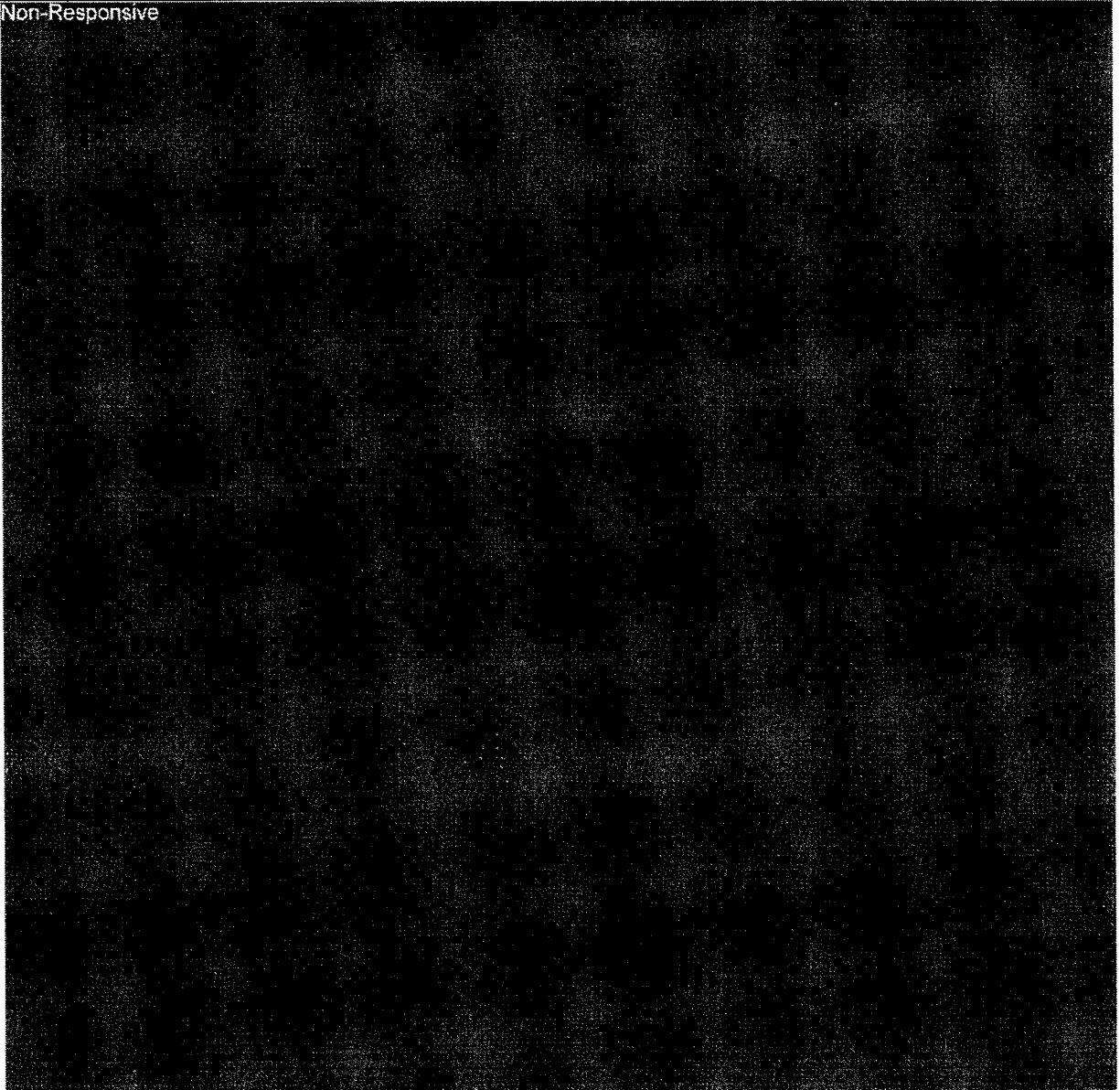
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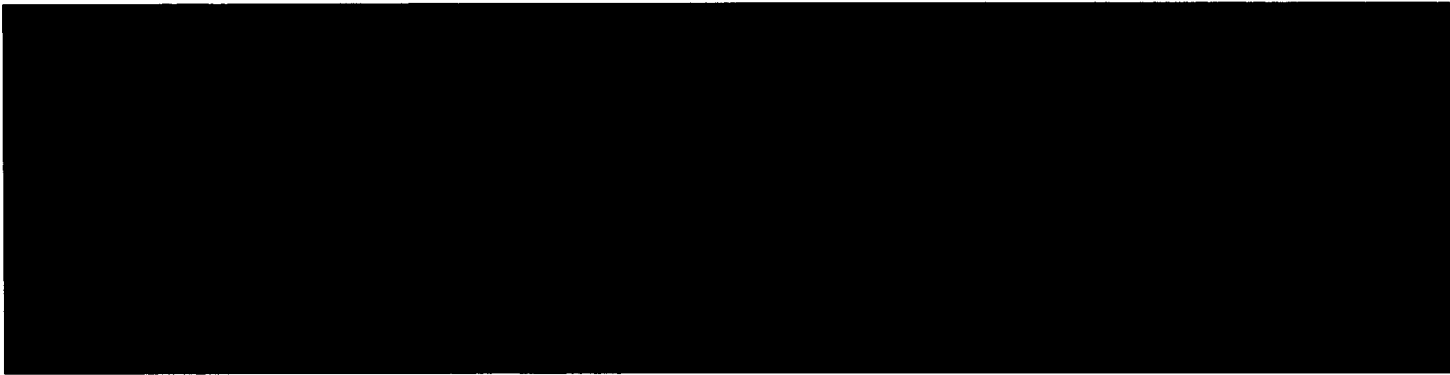


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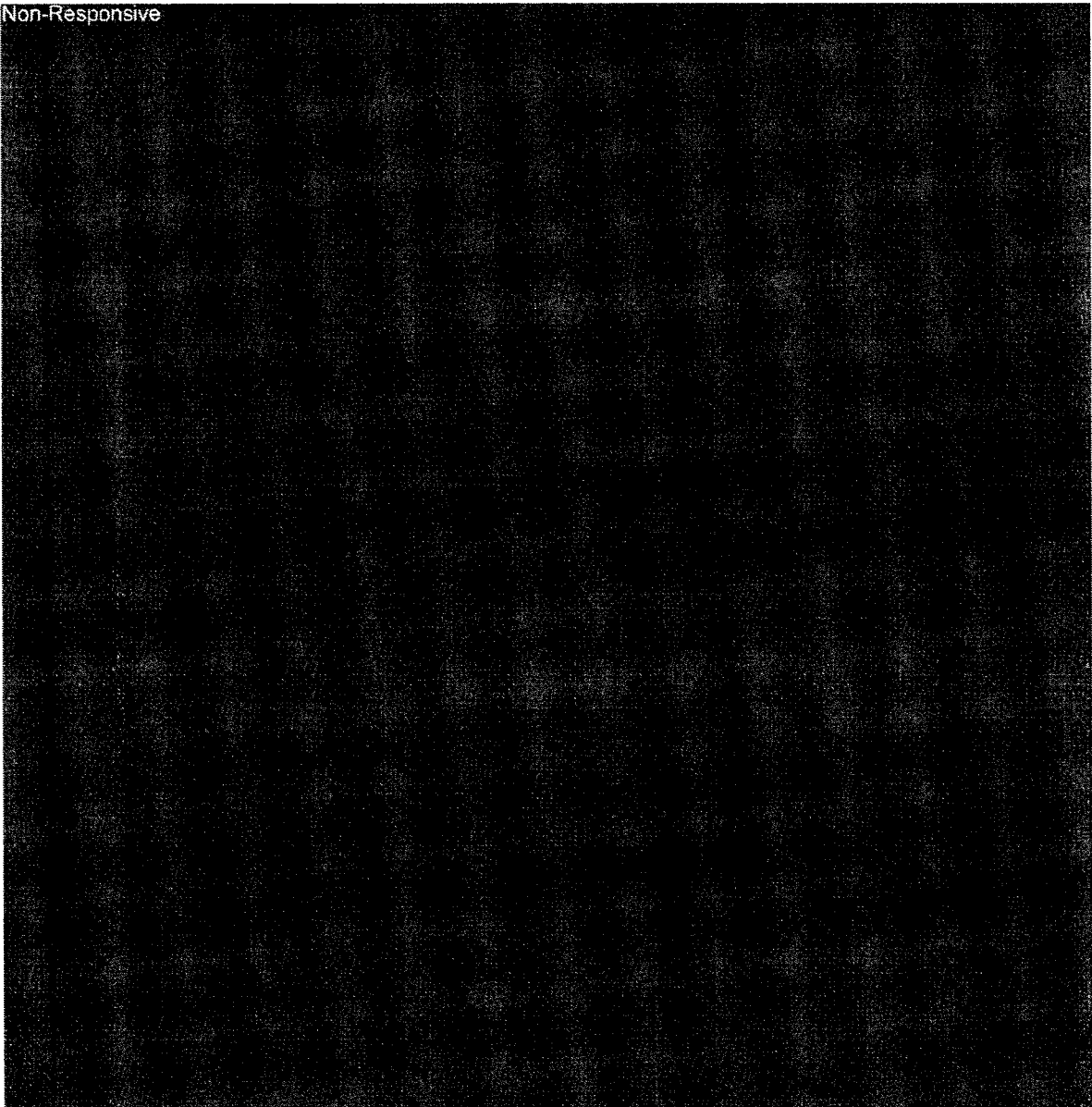
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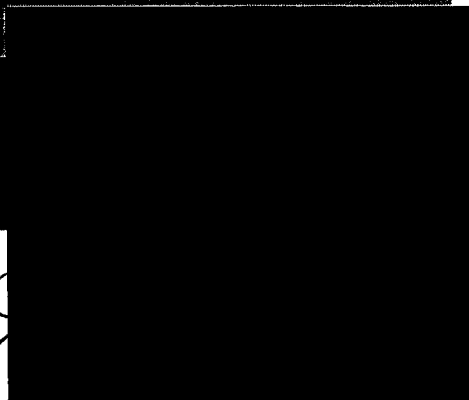
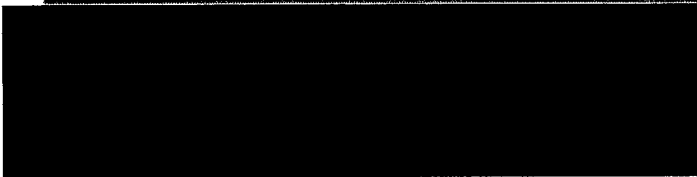


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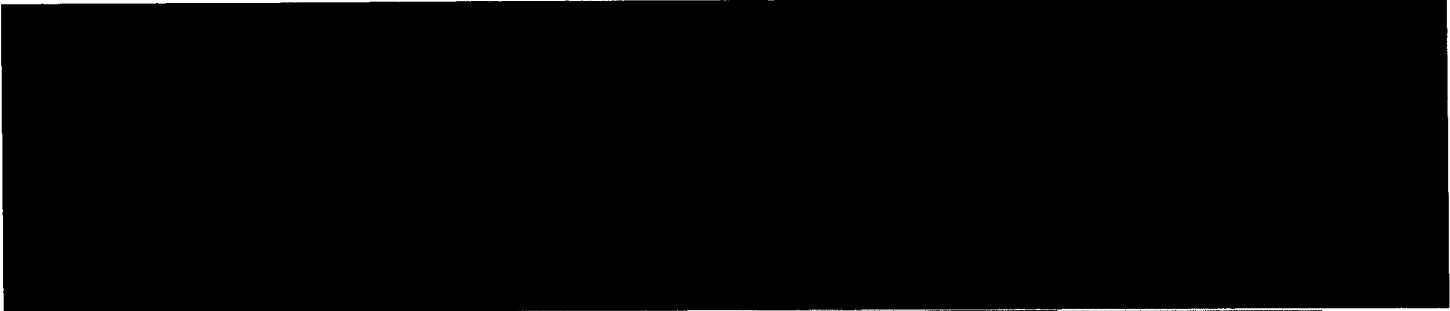
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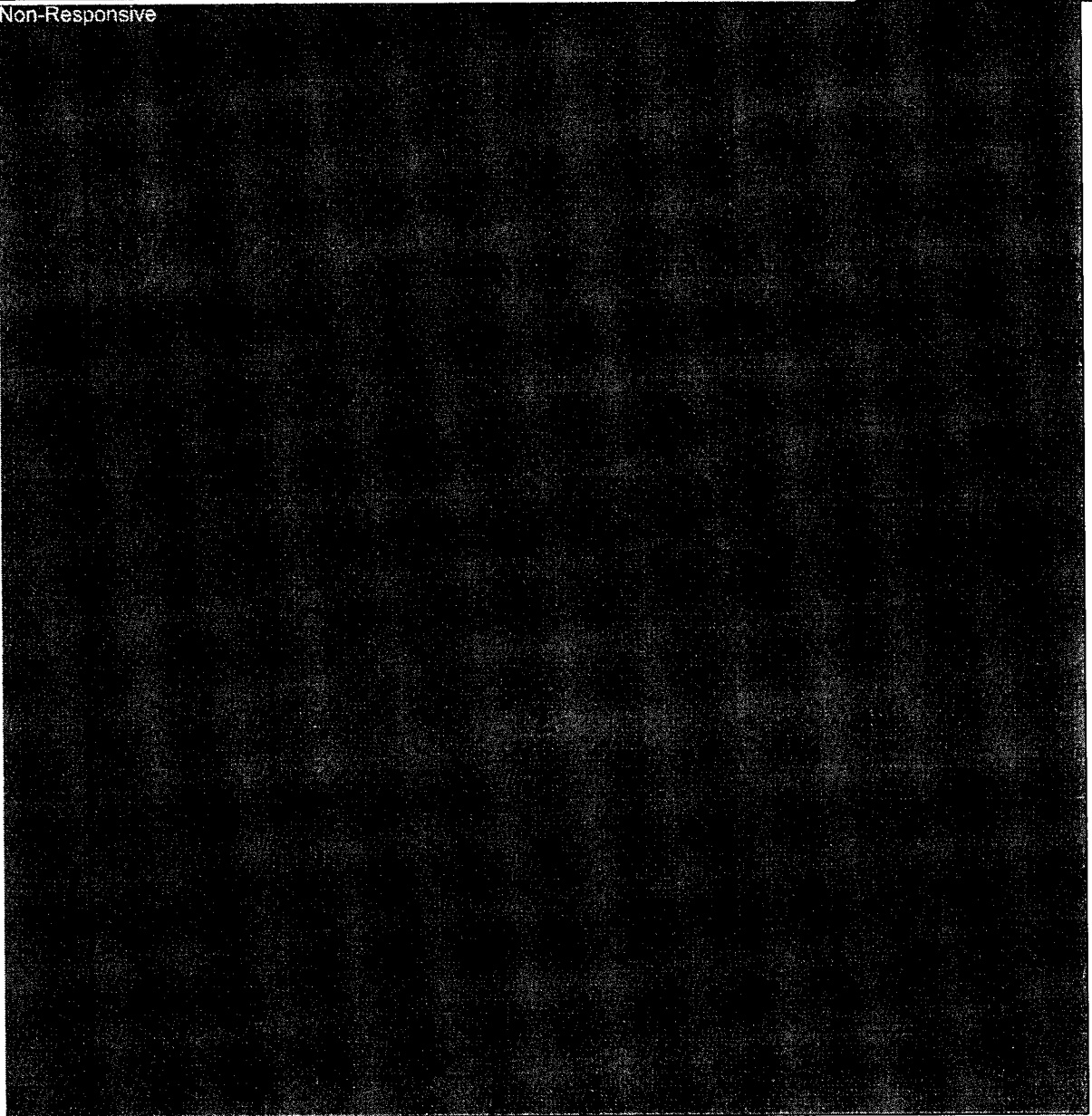
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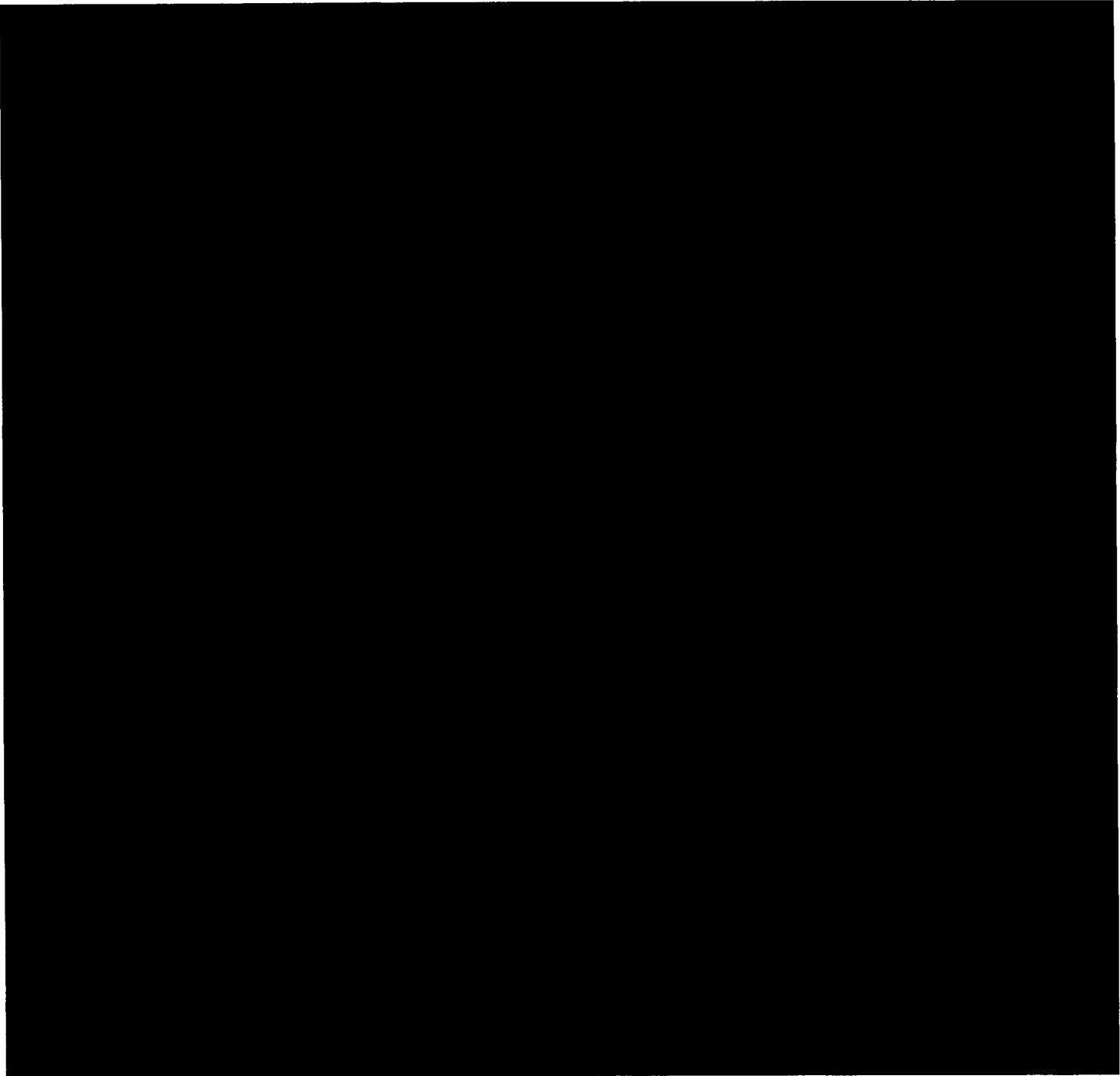


REDACTED

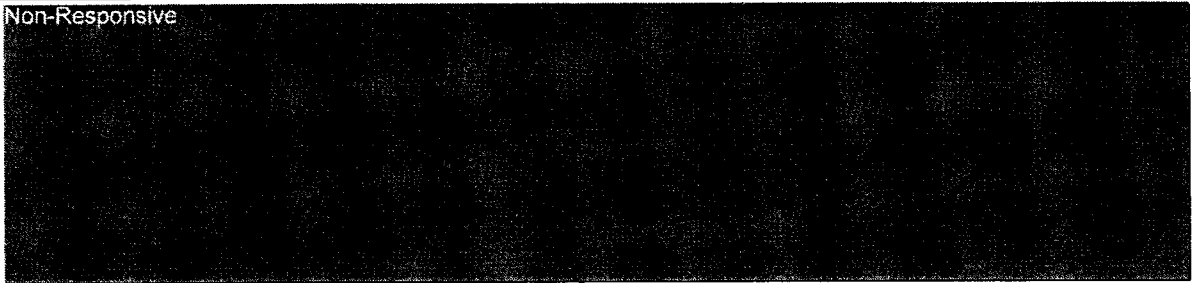
Non-Responsive



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Non-Responsive



REDACTED

Non-Responsive



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DOCUMENT	PAGE/LINE/ COLUMN	JUSTIFICATION
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000006	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000008 through 13CNT-FPSCPODS5-16-000009	All information on pages excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000013	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000034	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business

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000034		interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000037	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000098	2 nd bullet point, last word; 3 rd bullet point, last word; 4 th bullet point, last word; last bullet point, fourth word	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000102 through 13CNT-FPSCPODS5-16-000103	All information on pages excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000113	Last five bullet points on page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.

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PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000114 through 13CNT-FPSCPODS5-16-000116	All information on pages	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000131	All information on pages excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000132	5 th point bullet in its entirety; 2 nd to last bullet point in its entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000146	All information on page excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos.	Last 5 bullet points in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information

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13CNT-FPSCPODS5-16-000151		relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000155	Entire page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000168	All information on pages excluding heading	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000170	Entire page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 16 bearing Bates Nos. 13CNT-FPSCPODS5-16-000187	Entire page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of

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		the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000001 through 13CNT-FPSCPODS5-17-000014	Entire pages	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000015	1 st four paragraphs in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000017	1 st responsive paragraph on page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000020	From second to last paragraph to end of page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production	1 st three lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question

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No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000021		contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000023	1 st bullet point on page in its entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000025	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000026	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000030	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive

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		business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000050 through 13CNT-FPSCPODS5-000053	Entire pages	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000054	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000055	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000059	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's	All responsive lines on	§366.093(3)(e), Fla. Stat.

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Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000061	page in their entirety	The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000067	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000072	Entire page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000073	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000076	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which

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		would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000077 through 13CNT-FPSCPODS5-17-000078	Entire pages	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000079	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000081 through 13CNT-FPSCPODS5-17-000082	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000085	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.

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PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000086	Entire page	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000087	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000089	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-000090	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business interests, the disclosure of which would impair the competitive business of the provider/owner of the information.
PEF Response to Staff's Fifth Request for Production No. 17 bearing Bates Nos. 13CNT-FPSCPODS5-17-	All responsive lines on page in their entirety	§366.093(3)(e), Fla. Stat. The document portions in question contain confidential information relating to competitive business

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000091		interests, the disclosure of which would impair the competitive business of the provider/owner of the information.