

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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COMMISSION
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In re: FPSC's Review of Progress Energy
Florida's Code of Ethics Complaint.

Docket No. Undocketed

Dated: January 11, 2010

**AFFIDAVIT OF SUZANNE A. ENNIS 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 Suzanne A. Ennis, who being first duly sworn, on oath deposes and says that:

1. My name is Suzanne A. Ennis. 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.

2. I am the Associate General Counsel of Progress Energy Service Company in the Legal Department. This section is responsible for all legal matters and issues relating to PEF and Progress Energy Service Company.

3. As the Associate General Counsel for PEF and Progress Energy Service Company, I am responsible, for handling all employment, labor and ethics matters relating to all PEF and Progress Energy Service Company employees in Florida.

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4. PEF is seeking confidential classification for portions of its responses to Staff's Investigation Report and Staff's Interview Summaries relating to PEF's Code of Ethics Complaint. 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, its employees and companies that PEF has contracts with.

5. PEF hires employees and negotiates outside contracts to obtain contracts that provide economic value to PEF, its employees and its ratepayers. In order to obtain such employment and outside contracts, however, PEF must be able to assure employees that sensitive business information, such as employee personnel information and contract information, will be kept confidential. With respect to the information at issue in this Request, PEF has kept confidential and has not publicly disclosed confidential information such as employee personnel information and contract information. Absent such measures, PEF would run the risk that sensitive business information that employees and contractors provide to PEF, would be made available to the public and, as a result, end up in possession of other companies or interested parties. Faced with that risk, persons or companies who otherwise would contract with PEF might decide not to do so if PEF did not keep employee and contract information confidential. Without PEF's measures to maintain the confidentiality of sensitive information, the Company's efforts to obtain quality employees or other outside contracts could be undermined.

6. Additionally, the disclosure of confidential information in PEF's employee personnel files and outside contract information could adversely impact PEF's competitive business interests. If such information was disclosed, PEF's efforts to obtain quality personnel and contracts that provide economic value to both PEF and its ratepayers could be compromised by potential employees changing their behavior within the relevant markets.

7. Upon receipt of confidential information from employees and other outside companies, 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, and restricting the number of, and access to the information and contracts. At no time since receiving 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.

8. This concludes my affidavit.

Further affiant sayeth not.

Dated the 7th day of January, 2010.

Suzanne A. Ennis
(Signature)

Suzanne A. Ennis
Assoc General Counsel
Legal Department
Progress Energy Service Company
299 First Avenue North
St. Petersburg, FL 33701

7th THE FOREGOING INSTRUMENT was sworn to and subscribed before me this
day of January, 2010 by Suzanne A. Ennis. She is personally known to me, or has
produced her _____ driver's license, or her _____
as identification.

Sandra Cope
(Signature)

Sandra Cope
(Printed Name)

NOTARY PUBLIC, STATE OF FLORIDA

3/8/10
(Commission Expiration Date)

(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

