

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

REDACTED

In re: PEF's Responses to Staff's Smart Meter Data Request #1.

Docket No. Undocketed

Dated: June 14, 2012

RECEIVED-FPSC
12 JUN 14 PM 4:21
COMMISSION
CLERK

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

PROGRESS ENERGY FLORIDA INC.'S

REQUEST FOR CONFIDENTIAL CLASSIFICATION

For DN 03881-12, which is in locked storage. You must be authorized to view this DN.-CLK

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 provided in PEF's Responses to Staff's Smart Meter Data Request submitted on June 14, 2012. In support of this Request, PEF states:

1. PEF's Responses to Staff's Smart meter Data Request contains "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 an unredacted copy 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 version, 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

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

- COM _____
- APA _____
- ECR 2
- GCL _____
- RAD** 4
- SRC _____
- ADM _____
- OPC _____
- CLK 1

03880 JUN 14 2012
FPSC - COMMISSION CLERK

(c) Exhibit C is a 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 smart meter cost data and the competitive interests of PEF and its suppliers, the disclosure of which would impair their competitive businesses. *Id.* § 366.093(3)(e); Affidavit of Nabil Benwahoud at ¶ 5. 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 Nabil Benwahoud at ¶ 6. The information has not been disclosed to the public, and the Company has treated and continues to treat the information and contracts at issue as confidential. See Affidavit of Nabil Benwahoud at ¶ 6.

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 14th day of June, 2012.

Dianne M Triplett eme

R. ALEXANDER GLENN

General Counsel

JOHN T. BURNETT

Associate General Counsel

DIANNE M. TRIPLETT

Associate General Counsel

Progress Energy Service Company, LLC

Post Office Box 14042

St. Petersburg, Florida 33733-4042

Telephone: 727-820-5184

Facsimile: 727-820-5249

Email: john.burnett@pgnmail.com

Attorneys for

PROGRESS ENERGY FLORIDA, INC.

Exhibit B

REDACTED

REDACTED

COM _____
APA _____
ECR _____
GCL _____
RAD | _____
SRC _____
ADM _____
OPC _____
CLK _____

RECEIVED BY MAIL ROOM

03880 JUN 14 20

FPSC-COMMISSION CLERK

For residential self contained meters, PEF follows Attachment B.

For several years, PEF has required commercial customers with self contained meters to install meter enclosures with bypass switches. For these meters PEF follows Attachment C.

For customers with transformer rated meters, PEF follows Attachment D.

The meter enclosures are the customer's property and their responsibility to maintain. When an unsafe condition is found by a PEF employee or contractor, consistent with PEF's tariff, the condition will be made safe until it can be repaired or service will be disconnected until it can be repaired.

In the normal course of business, PEF does not perform any wiring on the customer's side of the meter enclosures. That work is performed by licensed electricians. In an unsafe condition related to the meter enclosure, PEF notifies the customer of the need to hire a licensed electrician to make the repairs prior to PEF installing a new meter.

During PEF's MMR deployment, the Company made repairs to any meter enclosures where damage was found during the meter exchange process. The customer continued to be responsible for any further maintenance on their meter enclosures. The AMI project team is planning to follow this same approach.

For AMR and MMR meters, the Company uses the following estimated times for replacing meters in its work order system. These costs only include labor associated with the change out itself and does not cover travel time or other cost associated with the meter change out.

Meter Type	Classification	Time to Change Meter Out	Estimated Cost of CMO*
Single Phase	R & D	10 minutes	████
Three Phase	Troubleman	10 minutes	████
Transformer - Rated	Field Meter Tech	20 minutes	████

*Estimated CMO cost is the classification's loaded wages and estimated truck usage costs.

PEF does not have estimated times for replacing AMI meters, because the installation of those meters has not yet begun.

Q4. What new tariffs or programs is the company planning to offer to customers as smart meters are installed throughout the utility service territory?

Response: PEF's initial AMI smart meter deployment is part of a project to upgrade aging components of EnergyWise HomeSM, an approved residential direct load control DSM program. Also, please refer to PEF's response to Question 6 below. At this time,

**PROGRESS ENERGY FLORIDA
Confidentiality Justification Matrix**

DOCUMENT/RESPONSES	PAGE/LINE	JUSTIFICATION
PEF Responses to Staff's Smart Meter Data Request	Response to Q.3 (chart) – estimated cost data for smart meters.	§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.