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April 24, 2006

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RECEIVED-FPSC
APR 24 PM 4:53
COMMISSION
CLERK

Rosanne Gervasi, Esquire
Legal Division
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: PSC Docket No. 050862-WU; Application for Staff Assisted Rate Case in Marion County
by County-Wide Utility Co., Inc.
Our File No. 40097.01

Dear Rosanne:

I am in receipt of your letter of April 19, 2006. While I understand your desires to have us be more specific in following the rule, including line and page number, given the staff's apparent reluctance to in any way support our Request for Confidential Treatment and the small size of this company, we are hereby withdrawing our Request for Confidential Treatment on these remaining issues.

I would like to make a few points about the staff's focus on these issues and why I believe it is misplaced. I recognize this will have no impact on our case, given the withdrawal, but do believe that the real issues we have been trying to address have gotten somewhat lost in our discussions. Both in your letter of April 19, 2006 and your previous letter of March 23, 2006 it is apparent that staff is attempting to explain why access to certain information concerning compensation of employees of non-regulated entities, is needed for staff to carry out their function of ensuring no cross-subsidization. We believe this misses the point.

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The issue with regard to confidential treatment has never been whether or not the Commission staff and its auditors should have access to the information it believes that it needs in order to verify the reasonableness or lack of cross-subsidization of the non-regulated entities. However, that should have little to no bearing on whether or not that information should be given confidential treatment. We believe that we have laid out a good case for why confidential treatment is appropriate under these circumstances, and we also believe that same information draws a major distinction between previous cases on which the Commission has ruled with regard to allocations from affiliated entities. We believe that the Commission's reading of the confidential treatment statutes has been overly restrictive, but such a determination is not necessary under these

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circumstances. What is necessary is an understanding that we are not talking about what the staff should have access to, but what should be allowed confidential treatment under the provisions of the statute.

We also believe that making individual amounts paid to outside contractors, not subject to confidential treatment, is a direct detriment to the customers of the Utility in that in the future when those contracts are again let out for bid, all bidding contractors know the amounts against which they are bidding. The stand taken by the staff in this regard, hurts only the customers of the Utility.

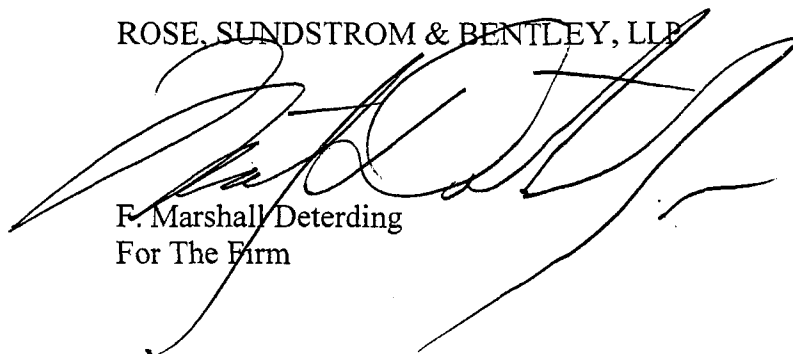
It is also of great concern to us that the confidential treatment process has become so complicated and labor intensive that its availability to anyone other than large companies is virtually nonexistent. The process itself has gotten overly burdensome.

With those points made, we hereby withdraw our Request for Confidential Treatment of any documents above and beyond those items that the staff has already recognized as confidential and returned to the Utility.

If you have any questions in this regard, please let me know.

Sincerely,

ROSE, SUNDSTROM & BENTLEY, LLP

A large, stylized handwritten signature in black ink, likely belonging to F. Marshall Deterding, is written over the printed name and firm name.

F. Marshall Deterding
For The Firm

FMD/tms

cc: Marshall Willis
Troy Rendell
Gerald Edwards
Bob Freeman
Blanca S. Bayo