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September 23, 2009

VIA HAND-DELIVERY

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COMMISSION
CLERK

Ms. Ann Cole, Director
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, FL 32399-0850

Re: *In Re: Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc., Docket No. 080121-WS*

Dear Ms. Cole :

Pursuant to Rule 25-22.006(4), Florida Administrative Code, enclosed for filing on behalf of Aqua Utilities Florida, Inc. ("AUF") are the original and fifteen (15) copies of AUF's Request for Confidential Classification of Supplemental Customer-Specific Information Requested by Staff ("Supplemental Request"). Attached to the Request are separate, sealed envelopes which contains the following:

- 1) Confidential Exhibit "A". Confidential Exhibit "A" is comprised of one (1) compact disc ("CD") containing the expanded addresses for certain customers residing in Alachua County, Florida. Because the information in Confidential Exhibit "A" is stored in electronic format, it is not possible to redact the confidential information contained therein.
- 2) Confidential Exhibit "B." Confidential Exhibit "B" is comprised of two (2) CDs containing the sound recordings of specific customer calls requested by staff. Because the information in Confidential Exhibit "B" is stored in electronic format, it is not possible to redact the confidential information contained therein.

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Ann Cole
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For our records, please acknowledge your receipt of this filing on the enclosed copy of this letter. Thank you for your assistance with this filing.

Sincerely,

HOLLAND & KNIGHT LLP


D. Bruce May, Jr.

DBM:kjg

Enclosures

cc: Ralph Jaeger, Esq.
Katherine Fleming, Esq.
Caroline Klancke, Esq.
Erik Sayler, Esq.
Charles Beck, Esq.
Cecilia Bradley, Esq.
Kimberly A. Joyce, Esq.

8803197_v1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water and)
wastewater rates in Alachua, Brevard,)
DeSoto, Highlands, Lake, Lee, Marion,)
Orange, Palm Beach, Pasco, Polk, Putnam,)
Seminole, Sumter, Volusia, and Washington)
Counties by Aqua Utilities Florida, Inc. _____)

DOCKET NO. 080121-WS

FILED: September 23, 2009

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**AQUA UTILITIES FLORIDA, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF SUPPLEMENTAL
CUSTOMER-SPECIFIC INFORMATION REQUESTED BY STAFF**

Aqua Utilities Florida, Inc. ("AUF"), pursuant to Section 367.156, Florida Statutes, and Rule 25-22.006(4), Florida Administrative Code, respectfully requests confidential classification of supplemental customer-specific information requested by staff (the "Request"). In support of the Request, AUF states:

1. In accordance with the Quality of Service Monitoring Plan in Order No. PSC-09-0385-FOF-WS (the "Order"), AUF is required to submit to the Commission (i) a monthly report listing all customer complaints for the first six (6) months after the Order is issued and (ii) sound recordings of customer complaints for the same period. Order at 22. In compliance with those directives, AUF has filed with the Commission the reports and sound recordings of all customer inquiries (including complaints) for the months of May, June, July and August 2009, respectively.

2. The customer inquiry reports contain customer-specific information such as the customer name, address, and phone number. Furthermore, the sound recordings reflect dialogues between the customer and AUF' customer service representatives which necessarily involves sensitive customer-specific information such as proprietary credit card data, Social Security number, bank account number, customer medical condition, address, and other highly confidential customer-specific information, disclosure of which would harm the privacy interests

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of individual customers and subject those customers to other harm, including potential identity theft. Consequently, AUF has formally requested confidential classification of that customer-specific information on June 22, July 20, July 23, August 20, August 31 and September 21, 2009 ("Prior Requests").

3. Earlier this month, Commission staff contacted AUF and requested that AUF supplement its prior filings relating to the Quality of Service Monitoring Plan and provide staff with (i) sound recordings of specific customer calls which staff had difficulty accessing and (ii) expanded addresses for certain customers residing in Alachua County, Florida. Commission staff acknowledged that this supplemental information would contain customer-specific information, and recommended that AUF could provide the information under a request for confidential classification.

Expanded Customer Addresses

4. Accordingly, in response to staff's request, AUF is providing one (1) compact disc ("CD") reflecting the expanded addresses for certain customers residing in Alachua County, Florida. This information is attached as Confidential Exhibit "A". The following columns in Confidential Exhibit "A" are confidential and have been highlighted to insure against public disclosure:

- Column A - contains the customer name which is detailed customer-specific information that the Commission has routinely protected as proprietary confidential business information.
- Columns B, C and D - contain customer address information which details customer-specific information that the Commission has routinely protected as proprietary confidential business information.

This information has been provided in electronic format pursuant to staff's request, and thus it is not possible to redact the confidential information contained therein. Pursuant to Florida

Administrative Code Rule 25-22.006, detailed justification for the confidential classification of the reports is set forth in AUF's Prior Requests. This CD has been placed in a sealed envelope marked "CONFIDENTIAL" and should receive confidential treatment by the Commission.

Sound Recordings

5. In response to staff's request, AUF is also providing sound recordings of specific customer calls which staff had difficulty accessing. In accordance with Florida Administrative Code Rule 25-22.006(4)(b), two (2) unedited disks containing the requested sound recordings are attached as Confidential Exhibit "B". Pursuant to Florida Administrative Code Rule 25-22.006, detailed justification for the confidential classification of the sound recordings has been set forth in AUF's Prior Requests. Because the information in Confidential Exhibit "B" is stored in electronic format, it is not possible to redact the confidential information contained therein. These CDs have been placed in a sealed envelope marked "CONFIDENTIAL" and should receive confidential treatment by the Commission.

WHEREFORE, based on the foregoing and for the reasons set forth in AUF's Prior Requests, AUF requests that the electronically stored customer-specific information contained in the CDs attached in Confidential Exhibit "A" and in Confidential Exhibit "B" be classified as confidential and exempt from Chapter 119, Florida Statutes, and Article I, Section 24(a), of the Florida Constitution for the maximum period.

Respectfully submitted this 23rd day of September, 2009 by:



D. Bruce May, Jr.
Florida Bar No. 354473

Gigi Rollini

Florida Bar No. 684491

Holland & Knight, LLP

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Counsel for Aqua Utilities Florida, Inc.

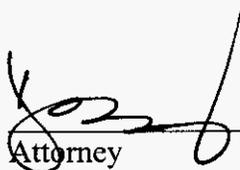
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was furnished by hand delivery this 23rd day of September, 2009 to the following:

Charles Beck, Esq.
Stephen C. Reilly, Esq.
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

Cecilia Bradley, Esq.
Office of the Attorney General
The Capitol – PL01
Tallahassee, FL 32399-1050

Ralph Jaeger, Esq.
Katherine Fleming, Esq.
Caroline Klancke, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



Attorney

Aqua Utilities Florida, Inc.

Expanded Customer Addresses

CONFIDENTIAL

EXHIBIT A

Aqua Utilities Florida, Inc.

Sound Recordings

CONFIDENTIAL

EXHIBIT B

STATE OF FLORIDA

COMMISSIONERS:
LISA POLAK EDGAR, CHAIRMAN
MATTHEW M. CARTER II
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

Public Service Commission

ACKNOWLEDGEMENT

DATE: September 23, 2009

TO: D. Bruce May, Jr., Esquire - Holland & Knight

FROM: Marguerite H. Mclean, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 080121-WS or, if filed in an undocketed matter, concerning supplemental customer-specific information requested by staff, and filed on behalf of Aqua Utilities Florida, Inc. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

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