

**USEPPA ISLAND  
UTILITIES, INC.**

January 11<sup>th</sup>, 2011

Ann Cole  
Florida Public Service Commission Clerks Office

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

For DN 00410-12, which  
is in locked storage. You must be  
authorized to view this DN.-CLK

Re: Useppa Island Utilities Co., Inc.  
Docket No. 110260-WS, Audit Control No. 11-266-4-1  
Staff Assisted Rate Case, TYE June 30, 2011

This letter is to request an extension for the Request for Confidential Classification according to Rule 25-22.006, F.A.C. regarding the above audit. I did receive the documents but did not understand the process.

When I worked with Bety Maitre and Kathy Welch I thought that as long as I stamped confidential these documents would not be public knowledge. I misunderstood and when Hyma called to discuss that is when I realized I didn't read the letter thoroughly. This is my first time at placing documents in a confidential status.

I have been working on this since yesterday and I really need more time .Please consider this extension.

Sincerely,

s/Lou Ann West

COM \_\_\_\_\_  
APA \_\_\_\_\_ Lou Ann West, Comptroller  
ECR \_\_\_\_\_ Useppa Isalnd Utilities co, Inc.  
GCL \_\_\_\_\_  
RAD \_\_\_\_\_  
SRC \_\_\_\_\_  
ADM \_\_\_\_\_  
OPC \_\_\_\_\_  
CLK   L  

DOCUMENT NUMBER 14  
00409 JAN 20 11  
FPSC-COMMISSION CLERK

Please see attached letter to Ann Cole. Please confirm receipt of this letter. Thank you.

*Lou Ann West*

Comptroller

Useppa Island Club

Phone 239.283.1061 Ext 115

Fax 239.283.4535

E-Mail [louann@useppa.com](mailto:louann@useppa.com)

[www.useppa.com](http://www.useppa.com)

Please think about resource conservation before you print this message.

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**Lou Ann West**

**From:** Filings@psc.state.fl.us  
**Sent:** Wednesday, January 11, 2012 2:01 PM  
**To:** Lou Ann West  
**Subject:** PSC electronic filing

Your electronic filing has been received by the Florida Public Service Commission, Office of Commission Clerk.

The filing date for an electronically transmitted document is the date that the Office of Commission Clerk receives the complete document. If the document is received on a non-business day, or after 5:00 p.m. (EST) on a business day, it will be considered filed as of 8:00 a.m. on the following business day.

E-filings are accepted in accordance with the Commission's Electronic Filing Requirements, which can be accessed on the Commission's Web Site at <http://www.floridapsc.com/dockets/e-filings/> or by contacting the Office of Commission Clerk at (850) 413-6770 during normal business hours. By electing to file electronically, you agree to abide by and accept the electronic filing requirements posted on the PSC's Web site.

Questions should be directed to the Office of Commission Clerk, Clerk@psc.state.fl.us, or call (850) 413-6770.

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JULIE I. BROWN

STATE OF FLORIDA



MIAMI DISTRICT OFFICE  
3625 NW 82ND AVENUE  
SUITE 400  
MIAMI, FL 33166-7602  
(305) 513-7816

## Public Service Commission

December 8, 2011

Lou Ann West  
Useppa Island Club  
8115 Main Street  
Bookeelia, FL 33922

**Re: Useppa Island Utilities Co., Inc.**  
**Docket No. 110260-WS, Audit Control No. 11-266-4-1**  
**Staff Assisted Rate Case, TYE June 30, 2011**

Dear Lou Ann West:

We have completed the fieldwork in the above referenced audit. Included with this letter are a copy of the audit work papers that the Commission is maintaining in a Temporary Confidential Status and a listing of these workpapers. Please sign and date a copy of this letter indicating that you have received these copies and mail it back in the enclosed envelope. The utility must file a Request for Confidential Classification according to Rule 25-22.006, F.A.C. in order to maintain this confidentiality. This request must be filed with the Commission within twenty-one days from today or these work papers will become public documents.

In future requests and correspondence with the Commission, please use the assigned working paper numbers and titles as found on the attached listing to describe the data so it can be effectively identified. Should you find that either the listing or the workpapers I have provided to you today contain incomplete page numbers, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bety Maitre", with a long horizontal flourish extending to the right.

Bety Maitre  
Audit Manager

cc: Clarence Prestwood

A handwritten signature in cursive script, appearing to read "Lou Ann West, Comptroller", with a long horizontal flourish extending to the right.  
Received by Company

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**USEPPA ISLAND UTILITIES CO., INC.**  
**REQUEST FOR CONFIDENTIAL CLASSIFICATION 12 JAN 20 AM 11:39**

Useppa Island Utilities Co., Inc. (the "Utility"), by and through its undersigned <sup>COMMISSION</sup> CLERK  
counsel, files this Request for Confidential Classification in relation to documents  
submitted in connection with the Utility's responses to Staff Audit in connection with  
Docket No. 110 260-WS.

1. Under Section 367.156, Florida Statutes, this Commission has the authority to  
classify certain material as proprietary confidential business information. This  
classification exempts the material from public disclosure under Section 119.07(1),  
Florida Statutes.

2. The Utility requests that certain information provided to Staff auditors in  
connection with Docket No. 110 260-WS be classified as proprietary confidential  
business information under Section 367.156(2), Florida Statutes, and Rule 25-22.06,  
Florida Administrative Code (the "Confidential Information"). If this request is granted,  
then the subject portions of said response to Docket No. 110 260-WS will be exempt  
from Section 119.07(1), Florida Statutes. Attached hereto as Exhibit "A" is a Justification  
Matrix providing a justification for the Utility's request. The information is enclosed  
herein both in highlighted and redacted format.

3. The information produced in response to Staff's Audit for compensation  
information is intended to be and is treated by the utility as private and confidential and  
has not been disclosed externally and has been strictly controlled internally.

4. A portion of the information consist of employee's name and title, base salary,  
benefits, overtime, raises, taxes, pension information and total compensation. This  
information should be classified as proprietary confidential business because its

disclosure would impair the Utility's competitive interest, provide other utility companies information to lure employees away (thereby driving up salaries and rates), and create circumstances under which infighting employee morale could be negatively affected.

5. Requiring the disclosure of each employee's compensation information violates each employee's right to privacy under Article I, Section 23 of the Florida Constitution.

6. Additionally, the information consists of confidential audited financial reports and Audit Staff's notes regarding these reports. This information falls squarely within the definition of "Proprietary Business Information" pursuant to Section 367.156(3)(b), Florida Statutes and/or Section 367.156(3)(c), Florida Statutes.

7. Finally, the information consists of loan and dept information that falls squarely within the definition of "Proprietary Business Information" pursuant to Section 367.156(3)(d), Florida Statutes and/or Section 367.156(3)(e), Florida Statutes.

WHEREFORE, USEPPA ISLAND UTILITIES CO., INC. prays for the entry of an order treating the information identified in this Motion as confidential and exempt from disclosure.

Respectfully submitted on this 19<sup>TH</sup> day of  
January, 2012 by:

THOMAS E. MOOREY, ATTORNEY  
1430 Royal Palm Sq. Blvd., Ste. 105  
Fort Myers, FL 33919  
Phone: 239-275-5005  
Florida Bar No. 128626



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Thomas E. Moorey, Attorney

Exhibit "A"

JUSTIFICATION MATRIX

| Location  | Justification  |
|---|--|
| 33-2<br>33-4 PP 1, 2, 3<br>33-5 Pg. 1, 2, 8<br>45-1 Pages 1-6<br>45-1 Pages 1,2,3<br>31-2 | Sections 367.156(3)(a)(b)(d)(e)<br>These documents contain highly sensitive information about the Utility's affiliated Parent Company's Financial position, debt structure and operating results. This information includes confidential financial reports which fall squarely within definition of "Proprietary Business Information" of Useppa Inn & Dock Company, Ltd...<br>Useppa Inn & Dock Company, Ltd. has kept and intends to keep this information confidential. |

| Location                             | Justification   |
|--------------------------------------|---|
| 31-2, 43-3<br>43-3 pg. 1<br>43-3 1-1 | Section 367.156(3)(d)(e)<br>Disclosure of compensation data, overtime and salary increase data would impair the ability of the Utility to contract for employees on favorable terms   |
| 43-3 1-6<br>Pgs. 1,2,3,4,5,6,8       | Disclosure of the compensation data would impair the Utility's competitive interests. The Utility keeps this information strictly confidential to prevent other utilities from stealing their employees and to prevent lowered moral and infighting among employees who have the same position but varying wages. |
| 43-3<br>43-3 1-7<br>Pg 1,2,2,4,5,6,  |   |

CERTIFICATE OF SERVICE  
DOCKET NO. 110 260-WS

I HEREBY CERTIFY that a copy of the foregoing Request for Confidential Classification has been sent to the PSC Clerk by FedEx and was furnished by U.S. mail to:

Stephen Reilly, Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison St., Room 812  
Tallahassee, FL 32399-1400

Jennifer Crawford, Esq.  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

on JAN 19, 2012.



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**Thomas E. Moorey, Attorney**  
**1430 Royal Palm Sq. Blvd., Ste. 105**  
**Fort Myers, FL 33919**  
**FL Bar No. 128626**  
**Telephone: 239-275-5005**