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COMMISSION CLERK November 11, 2013

VIA FEDEX

Ann Cole, Commission Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

REDACTED

RE:

Docket No.: 130180-WS; Application of Sunlake Estates Utilities, L.L.C. for

Original Water and Wastewater Certificates in Lake County, Florida

Our File No.: 46096.01

Dear Ms. Cole:

Enclosed please find Sunlake Estate Utilities, L.L.C.'s ("Utility") Request for Confidential Classification in relation to documents submitted in response to Staff's informal request for the Balance Sheet supporting the pro forma cost of capital calculations.

Should you or Staff have any questions, please do not hesitate to contact me.

Very truly yours,

MARTIN S. FRIEDMAN

For the Firm

MSF/der Enclosures

cc: Ben Allen, Esquire (via e-mail)

Amber Norris (via e-mail)

Julia E. Gilcher, Esquire (via e-mail) Stephen Reilly, Esquire (via e-mail) BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of

SUNLAKE ESTATES UTILITIES, L.L.C. for original water and wastewater

certificates in Lake County, Florida

DOCKET NO. 130180-WS

SUNLAKE ESTATES UTILITIES, L.L.C.
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Sunlake Estates Utilities, L.L.C. (the "Utility"), by and through its undersigned

counsel, files this Request for Confidential Classification in relation to documents submitted

in response to Staff's informal request for the Balance Sheet supporting the pro forma cost of

capital calculations.

1. Pursuant to 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 in response to

its informal request for the Balance Sheet supporting the pro forma cost of capital

calculations be classified as proprietary confidential business information under Section

367.156(2), Florida Statutes, and Rule 25-22.006, Florida Administrative Code (the

"Confidential Information"). If this request is granted, then the subject portions of said

response to Staff's informal data request 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 attached hereto in highlighted format and redacted

format (only the redacted format is provided with the Certificate of Service copies).

3. The information produced in response to Staff's informal request for the

Balance Sheet supporting the pro forma cost of capital calculations is of the Utility's sister

company from whom the utility assets will be transferred upon Commission approval and are intended to be and are treated by that entity as private and confidential and have not been disclosed externally and has been strictly controlled internally.

4. The Balance Sheet is extremely confidential also in light of the entity's obligations pursuant to Chapter 723, Florida Statutes, since the Sunlake Homeowners' Association has filed an Objection and is participating in this proceeding. Disclosure of such financial information would impair the negotiating positions with the Association.

WHEREFORE, The Utility prays for the entry of an order treating the information identified in this Request as confidential and exempt from disclosure and if not, then to return the documents to the undersigned.

Respectfully submitted this 11th day of November, 2013, by:

Sundstrom, Friedman & Fumero, LLP 766 North Sun Drive, Suite 4030

Lake Mary, FL 32746 Phone: (407) 830-6331 Fax: (407) 830-8522 <u>mfriedman@sfflaw.com</u> <u>drudolf@sfflaw.com</u> jhamel@sfflaw.com

MARTIN S. FRIEDMAN

Florida Bar No.: 0199060

For the Firm

CERTIFICATE OF SERVICE DOCKET NO. 130180-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification has been furnished by E-mail to the following parties this 11th day of November 2013:

Stephen Reilly, Associate Public Counsel Office of Public Counsel C/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 reilly.steve@leg.state.fl.us

Julia E. Gilcher, Esquire Staff Attorney, Economic Regulation Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 jgilcher@psc.state.fl.us

MARTIN S. FRIEDMAN

For the Firm

JUSTIFICATION MATRIX

| Location | Justification |
|--|---|
| (Document name and location of information) | |
| Balance Sheet: | §367.156(3)(a),(b),(d) & (e): Disclosure of the |
| | balance sheet sister company of Sunlake |
| <u>Location:</u> | Estates Utilities, LLC., which is not a public |
| The second column which lists classification | company and is not subject to public disclosure |
| of assets, and the third column which lists the | of its balance sheet would impair its |
| balances of certain asset and liability accounts | competitive interests, could be used to discern |
| | trade secrets, or harm its ability to contract for |
| | goods and services on a favorable basis. The |
| | entity keeps this information strictly |
| | confidential also to prevent competitors and |
| | prospective counterparties from information |
| | which could be used in future negotiations to |
| | the disadvantage of that entity and its affiliates. |

Balance Sheet

Period = Jun 2013

Book = Accrual; Tree = ysi_bs

Current Balance 1000-0000 1000-0001 1000-0002 1100-0000 1100-9998 1100-9999 1101-0000 1101-0030 1101-0040 1101-9999 1119-9999 1120-0000 1120-9999 1129-0000 1130-0000 1130-0030 1131-0000 1131-0030 1139-9999 1140-9998 1140-9999 1141-0000 1141-0010 1141-9998 1141-9999 1142-1000 1142-1010 1142-9998 1142-9999 1143-0000 1143-0010 1143-9999 1149-9996 1149-9997 1149-9998 1149-9999 1150-0000 1159-9998 1159-9999 1160-0000 1160-0010 1160-9998 1160-9999 1170-0000 1170-9998 1175-9999 1176-0000 1176-0010 1176-9998 1176-9999 1177-0000 1177-0010 1177-9998 1177-9999 1178-0000 1178-0010 1178-9998 1179-9998 1199-9999 1201-0000 1201-1000 1201-2000 1201-3000 1201-9999 1319-9999 1320-0000

Balance Sheet

Period = Jun 2013

Book = Accrual ; Tree = ysi_bs

