

Brendenwood Waterworks, Inc.

October 2, 2014

Office of Commission Clerk
Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

RECEIVED-FPSC
14 OCT -8 AM 9:32
COMMISSION
CLERK

Re: Docket No. 140120-WU – Application of Brendenwood Waterworks, Inc. for Approval of Transfer of Brendenwood Utilities, LLC’s Water System in Lake County – Motion and Request for Confidential Classification Pursuant to Section 366.093, F.S.; Response to Deficiencies; and Request for Additional Time

Dear Commission Clerk,

Brendenwood Waterworks, Inc. (Brendenwood) pursuant to Section 366.093, Florida Statutes (FS), and Rule 25-22.006(3), Florida Administrative Code, requests confidential classification of its response to Staff’s deficiency request letter dated September 19, 2014. Specifically, the Staff is requesting the **personal** financial statements of the individual owners of Brendenwood, the disclosure of which would harm the privacy interests of individual persons and subject those persons to other harm including potential identity theft and could provide unauthorized access to third parties.

The personal financial statements are those of the individual owners and not of a related company and/or parent corporation. This information should be considered proprietary confidential information in that is (i) intended to be and is treated as private, confidential information by the Company (Brendenwood), (ii) because disclosure of the information would cause irreparable harm to the Company’s business operation, and (iii) the information has not been voluntarily disclosed to the public. Again, this personal financial information is of individual persons who own the utility, and not of those of a regulated utility or related business. This personal financial information will include such information as, (a) personal residences, (b) personal bank accounts, (c) personal vehicles, (d) personal investments, (e) personal retirement funds and/or investments, (f) personal indebtedness, (g) personal mortgages, etc. This information is not commonly available for public disclosure on a personal individual nature.

Brendenwood respectfully submits that the requested **personal** financial information of individual persons, not businesses, is not contemplated to be covered under Section 366.093, FS. Specifically, Section 366.093(1), FS, states:

366.093 Public utility records; confidentiality.—
(1) The commission shall continue to have reasonable access to all public utility records and records of the **utility’s affiliated companies**, including its **parent company**, regarding transactions or cost allocations among the utility and such **affiliated companies** ... (Emphasis added)

As stated previously, the information requested is of a personal individual basis, and not of a company and/or business. The disclosure of personal individual financial information would

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have a chilling effect on future potential acquisitions of troubled water and wastewater utilities in the State of Florida by competent, experienced persons with the technical and financial wherewithal to provide continued quality of service the customers expect and are deserving thereof.

Brendenwood has conferred with the Office of Public Counsel and can represent that OPC is not opposed to this request.

Wherefore, Brendenwood respectfully requests that the staff requested personal financial statements of its individual owners be granted confidential classification and treated accordingly.

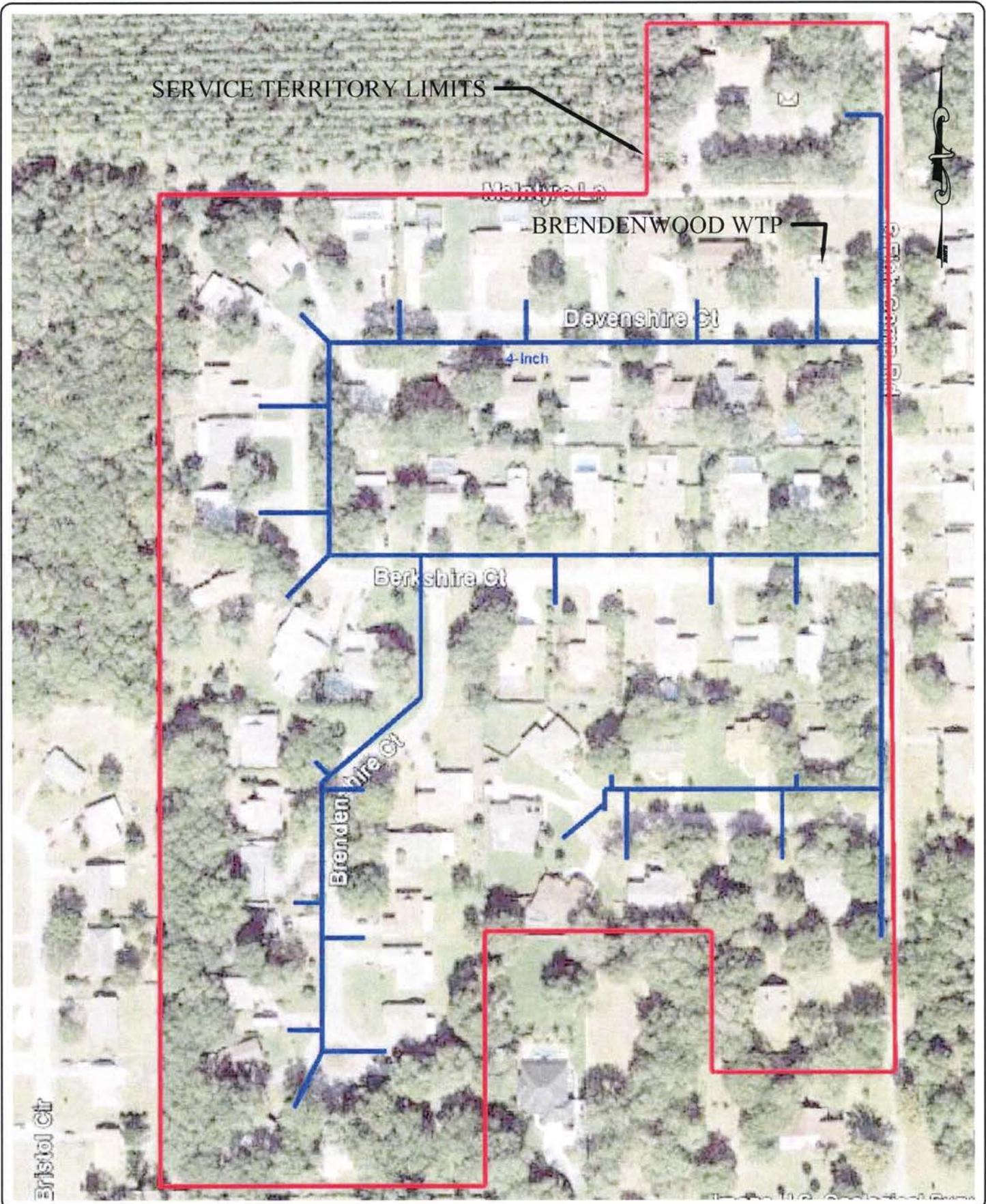
The personal financial information is enclosed in a sealed red envelope for both Mr. Gary Deremer and Ms. Vickie Penick. Brendenwood requests an additional two weeks extension to submit the personal financial information for Mr. Cecil Deicher.

Also attached is a copy of the map requested by staff.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Trendell", with a stylized flourish at the end.

Troy Rendell
Manager of Regulated Utilities
//For Brendenwood Waterworks, Inc.



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BRENDENWOOD WATERWORKS, INC.
 SERVICE TERRITORY MAP
 LAKE COUNTY, FLORIDA

ENGINEERING	
Design: KK	Date: 8/4/14
Drawn By: KK	Scale: N.T.S.
Checked By: KK	