

# Raintree Waterworks, Inc.

October 28, 2014

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

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COMMISSION  
CLERK

*Re: Docket No. 140121-WU – Application of Raintree Waterworks, Inc. for Approval of Transfer of Raintree Harbor Utilities, LLC’s Water System in Lake County – Motion and Request for Confidential Classification Pursuant to Section 366.093, F.S.; Second Response to Deficiencies*

Dear Commission Clerk,

Raintree Waterworks, Inc. (Raintree) 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 Raintree, 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.

Raintree 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.

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

Wherefore, Raintree 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 Mr. Cecil Deicher. Raintree requests that the information be classified as "proprietary confidential business information" within the meaning of Section 366.093(3), F.S. that, the information remain confidential for a period of at least 18 months as provided in Section 366.093(4), F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

Respectfully Submitted,



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