

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for original water
and wastewater Certificates in Sumter
County by South Sumter Utility Company, LLC /

DOCKET NO.: 160220-WS

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COMMISSION
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REQUEST FOR CONFIDENTIAL CLASSIFICATION

SOUTH SUMTER UTILITY COMPANY, L.L.C. ("*Applicant*"), by and through its undersigned attorneys and pursuant to Rule 25-22.006(4), Florida Administrative Code ("*FAC*") and Section 367.156, Florida Statutes, hereby requests confidential classification of certain financial information provided by the Applicant in response to Staff's Deficiency Letter dated November 7, 2017, and in support shows as follows:

1. In response to Staff's Deficiency Letter the Applicant is providing the Consolidated Income Statement ("*Confidential information*") of its parent, Holding Company of The Villages, Inc. ("*The Villages*").

2. As a newly-formed entity, the Applicant has no operating history and therefore does not have a basis on which it can independently show its financial ability to provide service as required under Rule 25-30.033(1)(h), FAC. The Applicant is providing the Confidential Information for the specific and limited purposes of satisfying the requirements of Rule 25-30.033(1)(h), FAC, and to enable the Commission to determine the ability of The Villages to provide the necessary financial support to the Applicant.

3. The Applicant seeks to have the Confidential Information classified as confidential pursuant to Rule 25-22.006(3), FAC. Although the Commission Staff requires the Confidential Information for the specific and limited purposes set forth in Rule 25-30.033(1)(h), FAC, the Confidential Information should not be made available for inspection and examination by the public under Section 119.07(1), Florida Statutes, for the following reasons:

- A. The ownership interests in The Villages are closely held and not publicly traded and the Confidential Information is not available to the public.
- B. It is not necessary to make the Confidential Information available to the public, and

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the public will not be harmed in any way by withholding the Confidential Information from public disclosure.

C. The Confidential Information includes financial and other information regarding other affiliates of The Villages which is irrelevant to the determinations to be made by the Commission Staff in connection with the Application and which the Commission does not require in order to discharge its duties and responsibilities.

D. The Confidential Information is not intended to be, nor is it, treated by The Villages as anything but private and confidential information, and has not been disclosed except pursuant to statutory provision, order of a court or administrative body or private agreement that provides that it will not be released to the public.

E. Disclosure of the Confidential Information would cause harm to the owners of The Villages and business operations of The Villages.

F. Disclosure of the Confidential Information would negatively affect the way The Villages' business plans and strategies are carried out.

4. Exhibit "A" to this Request is a "Justification Table" which specifies what information in the Confidential Information the Applicant asks the Commission to classify as confidential and the statutory justification for the request in compliance with Rule 25-22.006(4)(a), (b) and (c); one highlighted copy and one redacted copy of the Confidential Information.

WHEREFORE, SOUTH SUMTER UTILITY COMPANY, L.L.C. respectfully requests that the Commission determine that the Confidential Information is entitled to confidential treatment pursuant to Section 367.156, Florida Statutes, and Rule 25-22.006, FAC, and exempt the Confidential Information from public inspection and examination.

Respectfully submitted on this 10th day of November, 2016, by:

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Exhibit "A"
JUSTIFICATION MATRIX

Location (Document name and location of information)	Justification
<p><u>Consolidated Income Statement:</u> <u>2015</u></p> <p><u>Location:</u> The amounts under columns headings "Current Month" and "Year to Date".</p>	<p>§367.156(3)(a),(b),(d) & (e): As set forth in the Request and the disclosure of the financial statements of Holding Company of The Villages, Inc., which is not a public company and is not subject to public disclosure of its financial statements would impair its competitive interests, could be used to discern trade secrets, or harm its ability to contract for goods and services on a favorable basis. Holding Company of The Villages, Inc., 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 Holding Company of The Villages, Inc. and its affiliates.</p>

12 Months Ending 12/31/15

Current Month				Year-to-Date			
Budget	%	Actual	Variance%	Budget	%	Actual	Variance
Revenues							
Lot & home revenues							
Resident Amenity Fees							
Food Service Revenues							
Medical Revenues							
Retail Revenues							
Other revenues							
IntraDept Revenues							
Cost of sales							
Revenues							
Cost of goods sold							
Lot & home costs							
Cost of Sales							
Cost of sales							
Cost of Sales							
Gross Profit							
Selling, gen'l & admin							
Cost of goods sold							
Sell, gen'l & admin							
Sell, gen'l & admin							
Operating Profit							
Other income (expense)							
Sell, gen'l & admin							
Other income and expense							
Minority int. - Cable							
Other income and expense							
Interest Income							
Interest expense							
Interest expense							
Interest expense							
Depreciation							
Other income and expense							
Net Profit							