

LP WATERWORKS, INC.

FILED MAY 22, 2017
DOCUMENT NO. 04945-17
FPSC - COMMISSION CLERK

May 19, 2017

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

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2017 MAY 22 AM 8:22
COMMISSION
CLERK

Re: Re: Docket No. 160222-WS - Application for Staff Assisted Rate Case (SARC) in Highlands County by LP Waterworks, Inc. – Request for Confidential Classification Pursuant to Section 367.156(3), Florida Statutes – Staff Fourth Data Request No. 5

Dear Commission Clerk,

LP Waterworks, Inc. (LPWW) hereby requests confidential treatment concerning the response to Staff Fourth Data Request No. 5. The information is contained in the attached red envelope.

The information being requested is confidential within the meaning of Section 367.156(3), F.S. This information is treated by LPWW as strictly confidential because this information contains customer-specific proprietary information, the disclosure of which would harm the privacy interests of individual customers and subject those customers to other harm, including potential identity theft. Disclosure of customers' names, personal account numbers and addresses could provide unauthorized access to third parties; thus, potentially harming LPWW and its customers.

Section 367.156, Florida Statutes, authorizes the Commission to keep confidential and exempt from Section 119.07(1), Florida Statutes, "proprietary confidential business information." The Commission has consistently ruled that detailed customer-specific information such as customer name and address are confidential proprietary information, "the disclosure of which would harm the privacy interest of individual customers and deter customers from contacting the Company in the future if such information is subject to public disclosure. See, e.g., In re: Review of Florida Power Corporation's earnings, including effects of proposed acquisition of *Florida Power Corporation by Carolina Power & Light*, 02 F.P.S.C. 3:215, Docket No. 000824-E1, Order No. PSC -02-0356-CFO-E1 (Mar. 15, 2002). Similarly, the Commission has found that disclosure of a utility customer's "personal account numbers could provide unauthorized access to third parties; thus, potentially harming [the utility's] customers." See In re: Request for confidential treatment of certain information contained in draft report setting forth a review of customer deposit procedures of Florida's five investor-owned utilities, by *Progress Energy Florida, Inc.*, 07 F.P.S.C. 6:324, Docket No. 070245-EIY Order No. PSC-07- 0552-CFO-E1 (June 29, 2007).

This information should be considered proprietary confidential information in that is (i) intended to be and is treated as private, confidential information, (ii) because disclosure of the information

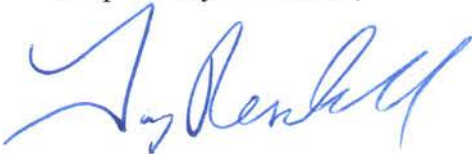
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would cause irreparable harm to LPWW's business operation and its customers, and (iii) the information has not been voluntarily disclosed to the public.

Wherefore, LPWW respectfully request that the requested information be granted confidential classification and treated accordingly. The above utilities request that the information be classified as "proprietary confidential business information" within the meaning of Section 367.156(3), F.S. that, the information remain confidential for a period of at least 18 months as provided in Section 367.156(4), F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

The requested information has been provided in an enclosed sealed red envelope.

Respectfully Submitted,



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