

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water and
wastewater rates in Charlotte, Highlands,
Lake, Lee, Marion, Orange, Pasco, Pinellas,
Polk, and Seminole Counties by Utilities, Inc.
of Florida

DOCKET NO. 20200139-WS

UTILITIES INC.'S MOTION FOR PROTECTIVE ORDER

UTILITIES, INC. OF FLORIDA (“Utility” or “UIF”) by and through its undersigned counsel, and pursuant to Rule 25-22.006(6), Florida Administrative Code, files this Motion for Protective Order with regard to documents responsive to Staff’s Third Request for Production of Documents (No. 15).

1. Staff in its Third Request for Production of Documents No. 15, has requested that the Utility produce all documents that support the Utility’s long-term and short-term debt. The Utility treats this information as strictly confidential. This Confidential Information is kept confidential by the Utility because public disclosure would impair the Utility’s ability to obtain future financing at the lowest possible rate.

2. The Confidential Information is proprietary confidential business information. Under Section 367.156, Florida Statutes, this Commission has the authority to classify certain material as proprietary confidential business information thereby exempting the material from public disclosure under Section 119.07(1), Florida Statutes.

3. Rule 25-22.006(6)(a), Florida Administrative Code, permits a utility to request a Protective Order protecting proprietary confidential information from discovery. The Utility has previously entered into a confidentiality agreement with OPC, allowing UIF to produce the documents to OPC.

4. Pursuant to Rule 25-22.006(6)(b), Florida Administrative Code, the Confidential Information is exempt from Section 119.07(1), Florida Statutes, pending the Commissions' ruling on this Motion.

WHEREFORE, UTILITIES, INC. OF FLORIDA request the Commission enter a Protective Order against public disclosure of the Confidential Information provided by the Utility in response to Staff's Third Request for Production of Documents, No. 15.

Respectfully submitted this 30th day of November, 2020.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

E-mail to the following parties this 30th day of November, 2020:

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