



Public Service Commission
CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: July 2, 2025

TO: Daniel Dose, Senior Attorney, Office of the General Counsel

FROM: ^{SQ} Scott Quigley, Public Utility Analyst II, Division of Accounting & Finance

RE: Staff recommendation on confidentiality of financial information provided in response to staff's request for determination of qualification for a corporate undertaking related to interim rate relief.

Docket No: 20250052-WS; Document No: 05250-2025
Source: CSWR-Florida Utility Operating Company, LLC

On June 26, 2025, CSWR-Florida Utility Operating Company, LLC (CSWR-Florida or Company) filed a request for confidential classification pursuant to Section 367.156(3), Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.). It pertains to information contained in CSWR-Florida's response to staff's request for financial statements. These statements are required to determine the Company's eligibility for a corporate undertaking related to interim rate relief in the above-referenced docket.

CSWR-Florida claims the subject information is intended and has been treated by the Company as private, and its disclosure would cause harm to the Company and its customers. Pursuant to Section 367.156(3), F.S., such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. In support of its request, CSWR-Florida claims that the confidential information contains trade secrets, information concerning bids or other contractual data, and information relating to competitive interests. Specifically, the material contains the most recent three years of financial statements for CSWR-Florida's parent company, CSWR, LLC and its subsidiaries.

Staff reviewed the documents provided in the response and concurs with CSWR-Florida. In staff's opinion, the Company's request meets the criteria for confidentiality set forth in Section 367.156(3)(d), F.S., 367.156(3)(e), F.S., and Rule 25-22.006, F.A.C. Therefore, staff recommends that CSWR-Florida's request for confidential classification be approved.

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-M-E-M-O-R-A-N-D-U-M-

DATE: June 30, 2025

TO: Division of Economics, Office of Primary Responsibility

FROM: OFFICE OF COMMISSION CLERK

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NO: 20250052-WS DOCUMENT NO: 05250-2025

DESCRIPTION: CSWR-FL (Crabb) - (CONFIDENTIAL) Three highlighted documents containing financial data responsive to staff's 6/13/25 request; 6/23/25 deposit balance confirmation from CSWR; 2024/2023 consolidated financial statements of CSWR and subsidiaries; and 2023/2022 consolidated financial statements of CSWR and subsidiaries (CSWR group financial data).

SOURCE: CSWR-Florida Utility Operating Company, LLC

The above confidential material was filed along with a request for confidential classification. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- ☒ The document(s) is (are), in fact, what the utility asserts it (them) to be.
- ☒ The utility has provided enough details to perform a reasoned analysis of its request.
- ☒ The material has been received incident to an inquiry.
- ☒ The material is confidential business information because it includes:
 - ☐ (a) Trade secrets;
 - ☐ (b) Internal auditing controls and reports of internal auditors;
 - ☐ (c) Security measures, systems, or procedures;
 - ☒ (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms;
 - ☒ (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information;
 - ☐ (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;

- ☒ The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- ☐ The material appears not to be confidential in nature.
- ☐ Portions of the material appear to be confidential in nature and are identified in the memorandum supporting this recommendation.
- ☐ The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Scott Dringey on 7/2/2025, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.