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May 20, 2011

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Ann Cole, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RECEIVED-FPSC
11 MAY 20 AM 10:38
COMMISSION CLERK

Re: Docket No. 100426-WS; Application for increase in water and wastewater rates in Lake County by Lake Utility Services, Inc.
Our File No.: 30057.194

Dear Ms. Cole:

On May 6, 2011, representatives of Staff, the Office of Public Counsel and Utilities, Inc. (the "Company") held an informal meeting to discuss ongoing rate case issues. Staff requested that the Company provide detailed information pertaining to how the Company determines individual salaries for use in Docket No. 1004296-WS. Attached hereto is the Company's explanation of its basis for determining salaries and the salary ranges of individual positions. This information is highly sensitive, and is being filed under an intent to request confidential classification. Envelope "A" contains the documents with the confidential data highlighted. Envelope "B" contains two copies of the redacted documents. Also enclosed for inclusion in the above-referenced docket is a Request for Confidential Treatment in connection with the enclosed documents.

Should you or the Staff have any questions regarding this filing, please do not hesitate to give me a call.

Very truly yours,

[Handwritten signature of Christian W. Marcelli]

CHRISTIAN W. MARCELLI
For the Firm

- claim of confidentiality
notice of intent
[X] request for confidentiality
filed by OPC

For DN 0352111, which is in locked storage. You must be authorized to view this DN.-CLK

Enclosures

- COM
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DOCUMENT NUMBER - DATE
03520 MAY 20 =
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Ann Cole, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
May 20, 2011
Page 2

cc: Steven M. Lubertozi, Executive Dir. of Regulatory Accounting & Affairs
(w/enclosures) (via e-mail)
John Stover, Vice President and Secretary (w/enclosures) (via e-mail)
Kirsten Weeks, Manager of Regulatory Accounting (w/enclosures) (via e-mail)
Patrick C. Flynn, Regional Director (w/enclosures) (via e-mail)
John Williams, Director of Governmental Affairs (w/enclosures) (via e-mail)
Frank Seidman (w/enclosures) (via e-mail)
Deborah Swain (w/enclosures) (via e-mail)
Andrew Maurey, Division of Economic Regulation (w/enclosures) (via e-mail)
Steve Reilly, Esquire, Office of Public Counsel (w/enclosures) (via e-mail)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of
LAKE UTILITY SERVICES, INC.
for an increase in water and wastewater
rates in Lake County, Florida

DOCKET NO.: 100426-WS

LAKE UTILITY SERVICES, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

LAKE UTILITY SERVICES, INC. (the "Utility"), by and through its undersigned counsel, files this Request for Confidential Classification in relation to documents submitted in response to Staff's request for salary information made at the informal meeting between representatives of Utilities, Inc., Staff and the Office of Public Counsel held on May 6, 2011.¹

1. Under Section 367.156, Florida Statutes, this Commission has the authority to classify certain material as proprietary confidential business information. This classification exempts the material from public disclosure under Section 119.07(1), Florida Statutes.

2. The Utility requests that certain salary range information provided to Staff pursuant to its above-described request be classified as proprietary confidential business information under Section 367.156(2), Florida Statutes, and Rule 25-22.06, Florida Administrative Code (the "Confidential Information"). If this request is granted, then the subject portions of said response will be exempt from Section 119.07(1), Florida Statutes. Attached hereto as Exhibit "A" is a Justification Matrix providing a justification for the Utility's request. The information is enclosed herein both in highlighted and redacted format.

3. The salary range information produced in response to Staff's request is intended to be and is treated by the utility as private and confidential and has not been disclosed externally and has been strictly controlled internally.

¹ Notice of the informal meeting was issued April 27, 2011, in Docket No. 110000-OT. See Document ID No. 028911. The confidential information is being filed in the above-referenced docket because the information pertains to an item that will be considered in said docket.

DOCUMENT NUMBER-DATES

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4. The information consists of information relating to competitive interests, the disclosure of which would impair the competitive business of the Utility.

5. Disclosure of the Confidential Information would impede the Utility's ability to contract for services on favorable terms, and would result in harm to the Utility and ratepayers.

WHEREFORE, LAKE UTILITY SERVICES, INC. prays for confidential treatment and the entry of the protective order that is consistent with this Motion.

Respectfully submitted on this 20th day of
May, 2011 by:

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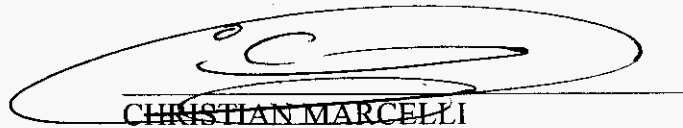


CHRISTIAN MARCELLI
For the Firm

CERTIFICATE OF SERVICE
DOCKET NO. 100426-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification has been hand delivered to the PSC Clerk and furnished by U.S. Mail to the following parties this 20th day of May, 2011:

Stephen Reilly, Esquire
Office of Public Counsel
C/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

A handwritten signature in black ink, appearing to read 'CHRISTIAN MARCELLI', is written over a horizontal line. The signature is enclosed within a large, hand-drawn oval shape.

CHRISTIAN MARCELLI
For the Firm

JUSTIFICATION MATRIX

<u>Location</u> (Document name and location of information)	<u>Justification</u> <i>Please note: All information for which the Utility requests confidential treatment has been kept confidential by the Utility, and intends to keep such information confidential.</i>
<p><u>Document:</u></p> <p>Utilities, Inc. – Salary Range Justification</p> <p><u>Location:</u> All of Page 1 of 1</p> <p><u>Document:</u></p> <p>Salary Range Tables (3 pages)</p> <p><u>Location:</u> Page 1 of 3 through Page 3 of 3; Columns C, D, E, F, and G, with the exception of the total number of positions in the respective tables on each page.</p>	<p>§367.156(3)(a) The salary range information is a trade secret.</p> <p>§367.156(3)(b) The salary range information concerns information developed as part of an internal review/audit of the Utility's salary ranges and practices.</p> <p>§367.156(3)(d) The salary range information concerns and analyzes salary information, the disclosure of which would impair the efforts of the utility or its affiliates to contract for goods or services on favorable terms</p> <p>§367.156(3)(e) The salary range information is highly sensitive information relating to competitive interests.</p>