

Eric Fryson

From: Dana Rudolf [drudolf@sfflaw.com]
Sent: Tuesday, December 18, 2012 4:47 PM
To: Filings@psc.state.fl.us
Cc: Martin Friedman; Martha Barrera; SAYLER.ERIK@leg.state.fl.us
Subject: Docket No. 110200-WU; Application for increase in water rates in Franklin County by Water Management Services, Inc.

Attachments: Request for Protective Order.pdf

- a) Martin S. Friedman, Esquire
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- b) Docket No. 110200-WU
Application for increase in water rates in Franklin County by Water Management Services, Inc.
- c) Water Management Services, Inc.
- d) 3 pages
- e) Request for Protective Order

DOCUMENT NUMBER DATE

08246 DEC 19 2012

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in
Water Rates in Franklin County by
Water Management Services, Inc.

Docket No. 110200-WU

WATER MANAGEMENT SERVICES, INC.'S
REQUEST FOR PROTECTIVE ORDER

WATER MANAGEMENT SERVICES, INC. ("WMSI"), by and through its undersigned attorneys and pursuant to Rule 25-22.006(6)(a), F.A.C., files this Motion for Protective Order, protecting confidential business information which Office of Public Counsel ("OPC") proposes to use at the evidentiary hearing in this matter, and in support thereof states:

1. In response to certain discovery requests by OPC, WMSI produced certain documents pursuant to a request for temporary protective order pursuant to Rule 25-22.006(6)(c), F.A.C.

2. OPC now seeks to use the following confidential documents produced pursuant to discovery requests:

a. The portion of Exhibit HWS-8 containing Financial Statements of Brown Management Group, Inc. No confidentiality is sought for the Brown Management Group, Inc. Annual Reports which are public records on the Florida Department of State website.

b. Exhibit HWS-18 contains Financial Statements of WMSI.

c. Exhibit HWS-21 contains a portion of the WMSI General Ledger.

DOCUMENT NUMBER 0211

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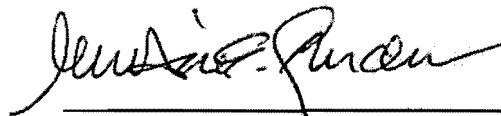
FPSC-COMMISSION CLERK

3. Financial Statements of Brown Management Group, Inc., Financial Statements of WMSI, and the General Ledger of WMSI are proprietary confidential business information, which is intended to be and is treated as private by Brown Management Group, Inc. and WMSI. In addition, the General Ledger discloses who WMSI does business with and amounts paid, the disclosure of which would affect WMSI's competitive interests in dealing with vendors, which would result in higher rates to customers.

WHEREFORE, WMSI requests this Commission issue an Order protecting the above described business information from public disclosure and thus exempt from Section 119.07(1), Florida Statutes.

Respectfully submitted this 18 day of
December, 2012, by:

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For the Firm

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by electronic mail and U.S. Mail to the following parties on this 18th day of December, 2012:

Martha Barrera
Mark Lawson
Florida Public Service Commission
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