

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for an 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. 160101-WS

**UTILITIES, INC. OF FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Utilities, Inc. of Florida ("Utility"), by and through its undersigned counsel, and pursuant to Section 367.156, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, files this Request for Confidential Classification in relation to certain documents responsive to Staff's Third Request for Production of Documents (No. 6) in connection with the above-referenced Docket that UIF understands the Staff intends to use at the final hearing.

1. Pursuant to 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 UI's short-term loan agreements provided to the Staff in response to Staff's discovery request referenced above be classified as proprietary confidential business information under Section 367.156(2), Florida Statutes, and Rule 25-22.006, Florida Administrative Code ("Confidential Information"). If this request is granted, then the subject portions of the documents produced 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 attached hereto both in highlighted and redacted format as appropriate.

3. Staff in its Thirds Request for Production of Documents, No. 6, has requested that the

Utility provide:

- COM _____
- AFD 1 bcd
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- TEL _____
- CLK _____

REDACTED

COMMISSION
CLERK

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Short-term debt. Please provide all documents, data, and work papers used to develop the short-term debt cost rate. Please provide all calculations related to the specific cost rates for the different debt issues, as well the computation of the source and amount of the amortization of debt discount and expense (i.e. debt facilities, loan agreements, prospectuses, etc.).

4. The loan documents produced in response to Staff's discovery referenced above are intended to be and are treated by the Utility as private and confidential and have not been disclosed externally and have been strictly controlled internally.

WHEREFORE, Utilities, Inc. of Florida requests this Commission enter an order treating the information identified in this Request as confidential and exempt from disclosure.

Respectfully submitted this 5th day of May, 2017 by:

FRIEDMAN & FRIEDMAN, P.A.
766 N. Sun Drive, Suite 4030
Lake Mary, FL 32746
Telephone: (407) 830-6331
E-Mail: mfriedman@ff-attorneys.com

/s/ Martin S. Friedman
MARTIN S. FRIEDMAN
For the Firm

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 5th day of May, 2017, to:

Erik L. Sayler, Esquire
Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
SAYLER.ERIK@leg.state.fl.us

Walter Trierweiler, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0855
trierwe@psc.state.fl.us

Brian P. Armstrong, Esquire
Law Office of Brian Armstrong, PLLC
P.O. Box 5055
Tallahassee, FL 32314-5055
brian@brianarmstronglaw.com

William S. Bilenky, Esquire
Douglas P. Manson, Esquire
Manson, Bolves, Donaldson & Varn
1101 Swann Avenue
Tampa, FL 33606
bbilenky@mansonbolves.com
dmanson@mansonbolves.com
dcantwell@mansonbolves.com

Edward de la Parte, Jr., Esquire
Nick Porter, Esquire
de la Parte & Gilbert P.A.
101 E. Kennedy, Suite 2000
Tampa, FL 33601
edelaparte@dgfirm.com
nporter@dgfirm.com

/s/Martin S. Friedman
MARTIN S. FRIEDMAN
For the Firm

Exhibit "A"
JUSTIFICATION MATRIX

Location (Document name and location of information)	Justification
<p><u>Credit Agreement</u></p> <p>All pages except index</p> <p><u>Amendment 2</u></p> <p>All pages</p> <p><u>\$25MM Credit Agreement</u></p> <p>All pages except index</p>	<p>§367.156(3)(a),(b),(d) & (e): Disclosure of the loan documents of Utilities Inc., which is not a public company and is not subject to public disclosure of its loan documents would impair Utilities, Inc.'s competitive interests, could be used to discern trade secrets, or harm its ability to contract for goods and services on a favorable basis. Utilities, Inc. keeps this information strictly confidential also to prevent competitors and prospective counterparties from information which could be used in future negotiations to the disadvantage of Utilities, Inc. and its affiliates.</p>