

ROYAL WATERWORKS, INC.

August 30, 2019

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FPSC - COMMISSION CLERK

Office of Commission Clerk
Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

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2019 SEP -6 AM 9:50
COMMISSIONER
CLERK

Re: Docket No. 20190170-WS – Application for transfer of water and wastewater systems of Royal Utility Company, water Certificate No. 259-W, and wastewater Certificate No. 199-S, to Royal Waterworks, Inc., in Broward County; request for new class of service, private fire protection, pursuant to Section 367.091, F.S. and Rule 25-30.465, F.A.C.; request for miscellaneous service charges, pursuant to Section 367.091, F.S.; and Rule 25-30.460, F.A.C.; request for customer deposits, pursuant to Section 367.091, F.S. and Rule 25-30.311, F.A.C.; and request for positive acquisition adjustment, pursuant to Rule 25-30.0371, F.A.C.

Dear Commission Clerk,

Royal Waterworks, Inc. (Royal) pursuant to 367.156(3), Florida Statutes (F.S.), and Rule 25-22.006(3) & (4), Florida Administrative Codes, requests confidential classification of the shareholder's personal financial records required by Rule 25-30.037(2)(1), Florida Administrative Code. Specifically, the rule requires the **personal** financial statements of the individual owners of Royal, the disclosure of which would harm the privacy interests of individual persons and subject those persons to other harm including potential identity theft and could provide unauthorized access to third parties.

The personal financial statements are those of the individual owners and not of a related company and/or parent corporation. This information should be considered proprietary confidential information in that is (i) intended to be and is treated as private, confidential information by the Company (Royal), (ii) because disclosure of the information would cause irreparable harm to the Company's business operation and personal interests of the shareholders, and (iii) the information has not been voluntarily disclosed to the public. Again, this personal financial information of individual persons who own the utility, and not of those of a regulated utility or related business. This personal financial information will include such information as, (a) personal residences, (b) personal bank accounts, (c) personal vehicles, (d) personal investments, (e) personal retirement funds and/or investments, (f) personal indebtedness, (g) personal mortgages, etc. This information is not commonly available for public disclosure on a personal individual nature.

Royal respectfully submits that the requested **personal** financial information of individual persons, not businesses, is not contemplated to be covered under Section 367.156, FS. Specifically, Section 367.156(1), FS, states:

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367.156 Public utility records; confidentiality.—

(1) The commission shall continue to have reasonable access to *all utility records* and *records of affiliated companies*, including *its parent company*, regarding transactions or cost allocations among the utility and such affiliated companies, and such records necessary to ensure that a utility's ratepayers do not subsidize nonutility activities. (Emphasis added)

As stated previously, the information requested is of a personal individual basis, and not of a company and/or business. The disclosure of personal individual financial information would have a chilling effect on future potential acquisitions of troubled water and wastewater utilities in the State of Florida by competent, experienced persons with the technical and financial wherewithal to provide continued quality of service the customers expect and are deserving thereof.

Section 367.156, Florida Statutes, authorizes the Commission to keep confidential and exempt from Section 119.07(1), Florida Statutes, "proprietary confidential business information. Wherefore, Royal respectfully requests that the required *personal* financial statements of its individual owners be granted confidential classification and treated accordingly.

Royal request that the information be classified as "proprietary confidential business information" within the meaning of Section 367.156(3), F.S. that, the information remain confidential for a period of at least 18 months as provided in Section 367.156(4), F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

The personal financial information is enclosed in a sealed red envelope.

Respectfully Submitted,



Troy Rendell
Vice President
Investor Owned Utilities
//For Royal Utility Company, Inc.