

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for staff-assisted rate case in Marion County by County-Wide Utility Co., Inc.

DOCKET NO. 050862-WU

REQUEST FOR CONFIDENTIAL CLASSIFICATION

COUNTY-WIDE UTILITY CO., INC., by and through its undersigned attorneys and pursuant to Rule 25-22.006, Florida Administrative Code and Section 367.156, Florida Statutes, hereby requests confidential classification of the various audit workpaper and supporting schedules contained within the audit, schedules provided as part of the response to the Staff's First Data Request, as noted below, which are filed on a confidential basis simultaneously herewith, and in support thereof states:

1. Attached hereto are various invoices, workpapers and confidential information supplied to the auditors and in a Response to Staff's Data Request, which are confidential in nature under the provisions of Section 367.156(3), Florida Administrative Code and as such, should be accorded confidential classification under that statute and the above-referenced rule.

2. The information contained in Attachment "A" and part of Attachment "B" of the audit workpapers entitled "service charges" and "related party allocations and transactions" respectively, workpapers 25-1, 43-1 (including sub pages 1 through 14); workpapers 44-1 (pages 1, 2 and 3 of 4); workpapers 43-5 (pages 1 through 14) and Attachment "A" to the correspondence dated February 3, 2006 from Dirk Leeward to the Commission staff contain unit pricing

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information from related and unrelated parties concerning negotiated services provided to the Utility is all confidential in nature. All such information concerns contractual data, the disclosure of which will impair the efforts of the Utility to contract for goods and services on favorable terms, as it will disclose to all interested persons the amount that the Utility has been paying for such services and will substantially diminish the Utility's ability to negotiate the best possible prices for such services in the future, to the detriment of the Utility and its customers.

3. Information contained in Attachment "B" to the audit workpapers entitled "related party allocations and transactions" (specifically that contained in reference to Account 601 and 603 Salaries and Wages, Account 604, Employee Pensions and Benefits) and Attachment "C" contain information concerning allocations of the salary of bookkeeper/office manager Rebecca G. Chauncy; workpaper 43-5, including social security numbers and gross wages not directly related to the Utility; workpaper 43-5, sub 3, page 3 (same as Attachment "C") contains disclosure of salary information by which persons can learn salaries of individuals not employed full-time by the Utility but instead, which are allocated to the Utility and as such, all of those figures related to personal salary information for employees who are not exclusively Utility employees, but are employees of third party entities for which alloca-

tions are made to the Utility. While the gross amounts allocated to the Utility are not redacted and not requested confidential information, the specifics underlying how those allocations were derived and will divulge the salaries of individuals for services provided outside of Utility operations and as such, should be granted confidential treatment. The Utility has not attempted to remove those costs or information which solely provides information concerning the amount charged to the Utility.

4. The information contained in workpaper 33-1, pages 1 through 6, contains bank statements including account numbers and loan numbers which should not be public record as that is private information and disclosure of which could result in potential for theft from the bank accounts of the Utility and as such, should be redacted and provided with confidential treatment.

5. Contained as part of workpaper 43-5, pages 1 through 14 are invoices rendered by Enviro-Masters to County-Wide Utility Co., Inc. These disclose account numbers and customer names which is private information to the customers of the Utility and divulging such private ratepayer information may be detrimental to and cause harm to the ratepayers of the Utility. As such, those should be granted confidential treatment.

6. The system maps provided as Item #5 to Mr. Leeward's February 3, 2006 response to Staff's First Data Request are kept confidential by the Florida Department of Environmental Protection

as their publication represents a security risk for the Utility and its customers, as such, those maps should be afforded confidential treatment.

7. Each item for which confidential classification is sought herein is intended to be and is treated as private and has not otherwise been disclosed by the Utility or other persons affected.

WHEREFORE, COUNTY-WIDE UTILITY CO., INC. requests this Commission find and determine that the information outlined herein and provided to the Commission as part of the staff assisted rate case audit workpapers in this docket and certain information provided in response to the Staff's First Data Request (which response is dated February 3, 2006), should be granted confidential treatment in accordance with the requirements of Section 367.156, Florida Statutes and Rule 25-22.006, Florida Administrative Code and should be exempt from public disclosure.

Respectfully submitted on this
10th day of March, 2006, by:

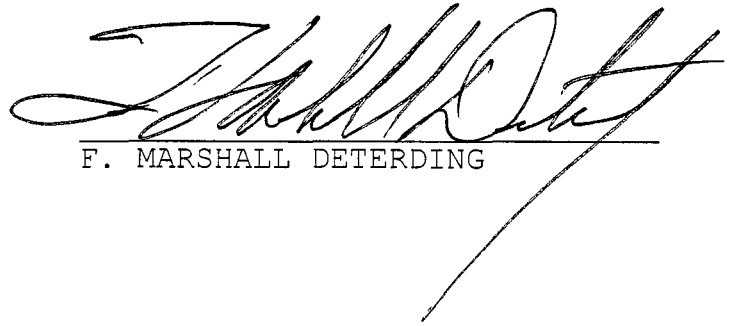
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BY: 
F. MARSHALL DETERDING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished Via Hand Delivery (*) this 17th day of March, 2006, to:

Rosanne Gervasi, Esquire
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0873



F. MARSHALL DETERDING

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