

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for Authority to  
Transfer the Assets of Utility Corporation  
of Florida, Inc. and Certificate No. 550-S  
to South Highlands Investment Corporation  
in Highlands County, Florida

Docket No. 140145-SU

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**SOUTH HIGHLANDS INVESTMENT CORPORATION'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

SOUTH HIGHLANDS INVESTMENT CORPORATION ("SHIC"), by and through its undersigned counsel, files this Request for Confidential Classification in relation to a document submitted with the response served on September 26, 2014 to Staff's Deficiency Letter.

1. Pursuant to 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. SHIC requests that a certain document provided to Staff in connection with its response to Staff's Deficiency Letter 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 document in said response to Staff's Deficiency Letter will be exempt from Section 119.07(1), Florida Statutes. Attached hereto as Exhibit "A" is a Justification Matrix providing a justification for SHIC's request. The information is enclosed herein both in highlighted and redacted format.

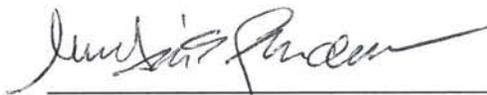
3. The specific document produced in response to Staff's Deficiency Letter is the Balance Sheet of SHIC which sets forth specific assets and liabilities that are unregulated, which Balance Sheet is intended to be and is treated by SHIC as private and confidential and has not

been disclosed externally and has been strictly controlled internally. SHIC does not seek confidential treatment of the asset listings and amounts for regulated assets.

WHEREFORE, South Highlands Investment Corporation requests confidential treatment of the referenced documents and the entry of the protective order that is consistent with this Motion.

Respectfully submitted this 26<sup>th</sup> day of  
September, 2014, by:

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Florida Bar No.: 0199060  
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><b><u>Document:</u></b></p> <p>Balance Sheet</p> <p><b><u>Location:</u></b></p> <p><u>Current Assets:</u> The listing of and amounts for such assets, including total and subtotal amounts, other than the regulated asset “Sewer Treatment Plant.”</p> <p><u>Other Assets:</u> The listing of and amounts for such assets, including total and subtotal amounts other than the regulated asset “Spring Lake Water Treatment Plant.”</p> <p><u>Liabilities and Equity:</u> All total and subtotal amounts.</p>	<p>§367.156(3)(a),(b),(d) &amp; (e): Disclosure of the Balance Sheet of South Highlands Investment Corporation, which is not a public company and is not subject to public disclosure of its financial statements would impair its competitive interests, could be used to discern trade secrets, or harm its ability to contract for goods and services on a favorable basis. Non-regulated assets being held by South Highlands Investment Corporation are for sale and a prospective purchaser’s knowledge of the value on the books of South Highlands Investment Corporation will have an adverse effect on its negotiation of the sale of such non-regulated assets. South Highlands Investment Corporation 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 South Highlands Investment Corporation.</p>