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Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A.
420 South Orange Avenue, Suite 700
P.O. Box 2346
Orlando, FL 32801

Attorneys and Counselors at Law
Orlando
Fort Pierce
Naples
Viera/Melbourne
Vero Beach

(407) 841-1200
(407) 423-1831 Fax
www.deanmead.com

MARTIN FRIEDMAN
407-310-2077
mfriedman@deanmead.com

December 9, 2024
Via FedEx

Adam Teitzman, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

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Re: Docket No. 20240068-WS - Application for increase in water and wastewater rates in Charlotte, Highlands, Lake, Lee, Marion, Orange, Pasco, Pinellas, Polk and Seminole Counties, by Sunshine Water Services Company

Dear Mr. Teitzman:

On behalf of Sunshine Water Services Company, enclosed is the original of its Motion for Protective Order and request for Confidential Classification with the redacted confidential documents for filing in this Docket. Also enclosed in a separate envelope is a highlighted copy of the confidential documents. The staff and OPC already have access to the confidential documents.

Should you or Staff have any questions regarding this response please do not hesitate to contact me.

Very truly yours,



Martin Friedman

COM _____
AFD 1 redacted copy
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
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MSF:

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water and
wastewater rates in Charlotte, Highlands,
Lake, Lee, Marion, Orange, Pasco, Pinellas,
Polk, and Seminole Counties by Sunshine Water
Services Company

DOCKET NO. 20240068-WS

**SUNSHINE WATER SERVICES COMPANY'S MOTION FOR PROTECTIVE ORDER
AND REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Sunshine Water Services Company ("Utility") by and through its undersigned counsel, and pursuant to Rules 25-22.006(4) & (6), Florida Administrative Code, files this Motion for Protective Order and Request for Confidential Classification with regard to documents responsive to Office of Public Counsel's Request for Production of Documents No. 46 ("Confidential Documents").

1. The requested Confidential Documents are Audit Committee Minutes of the Utility's parent company.¹ Under Section 367.156, Florida Statutes, this Commission has reasonable access to records of a utility's parent company and concurrently the authority to classify certain material as proprietary confidential business information thereby exempting the material from public disclosure under Section 119.07(1), Florida Statutes. Corporate minutes of the Utility's parent company are not public and are considered by the parent company to be confidential and treated as such. This Commission has previously held that corporate minutes are protected as proprietary business information. See, for example, PSC Order Nos. PSC-2017-0158-CFO-WS, PSC-PSC-2008-0447-PCO-WS and PSC-2003-0410-CFO-WS.

2. Rule 25-22.006(6)(a), Florida Administrative Code, permits a utility to request a Protective Order protecting proprietary confidential information from discovery.

¹ Specifically, the documents are the Audit Committee Minutes for March 16, 2022, and March 16, 2023, of Corix Regulated Utilities (US) Inc., which, at the time of the meeting, was the holder of 100% of the Utility's stock.

3. Pursuant to Rule 25-22.006(6)(b), Florida Administrative Code, the Confidential Information is exempt from Section 119.07(1), Florida Statutes, pending the Commissions' ruling on this Motion. The Utility has entered into a Confidentiality Agreement with OPC, allowing the Utility to provide the Confidential Documents to OPC.

4. The Justification Schedule is attached.

5. Upon a finding by the Commission that the information is proprietary and confidential business information, the information should not be declassified for at least 18 months and should be returned to the undersigned as soon as it is no longer necessary for the Commission to conduct its business.

WHEREFORE, Sunshine Water Services Company requests the Commission enter a Protective Order against public disclosure of the Confidential Information provided by the Utility in response to OPC POD #46.

Respectfully submitted this 9th day of December, 2024.

DEAN MEAD
420 South Orange Ave., Suite 700
Orlando, FL 32801
Direct Telephone: (407) 310-2077
Fax: (407) 423-1831
mfriedman@deanmead.com



Martin S. Friedman, Esquire

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

Electronic mail to the following parties this 9th day of December, 2024:

Walt Trierweiler, Esquire
Charles J. Rehwinkel, Esquire
Octavio Simoes-Ponce, Esquire
Austin Watrous, Esquire
Office of Public Counsel
c/o Florida Legislature
111 West Madison Street, Suite 812
Tallahassee, FL 32399-1400
TRIERWEILER.WALT@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
PONCE.OCTAVIO@leg.state.fl.us
WATROUS.AUSTIN@leg.state.fl.us

Ryan Sandy, Esquire
Saad Farooqi, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
sfarooqi@psc.state.fl.us
rsandy@psc.state.fl.us
discovery-gcl@psc.state.fl.us



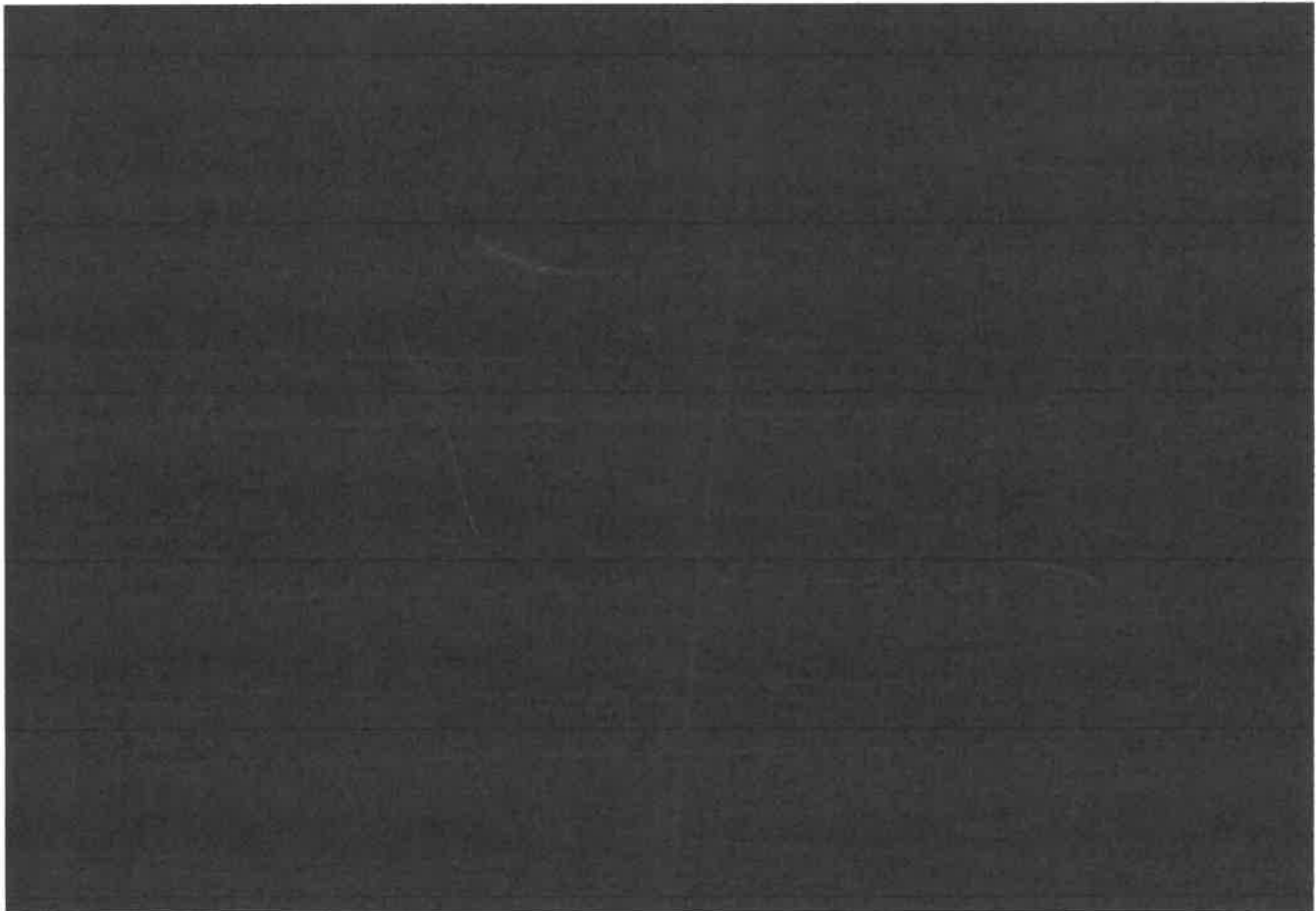
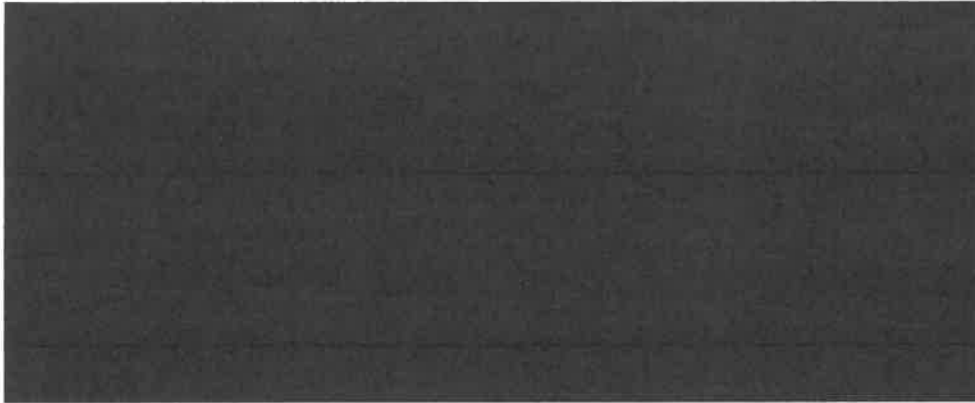
Martin S. Friedman

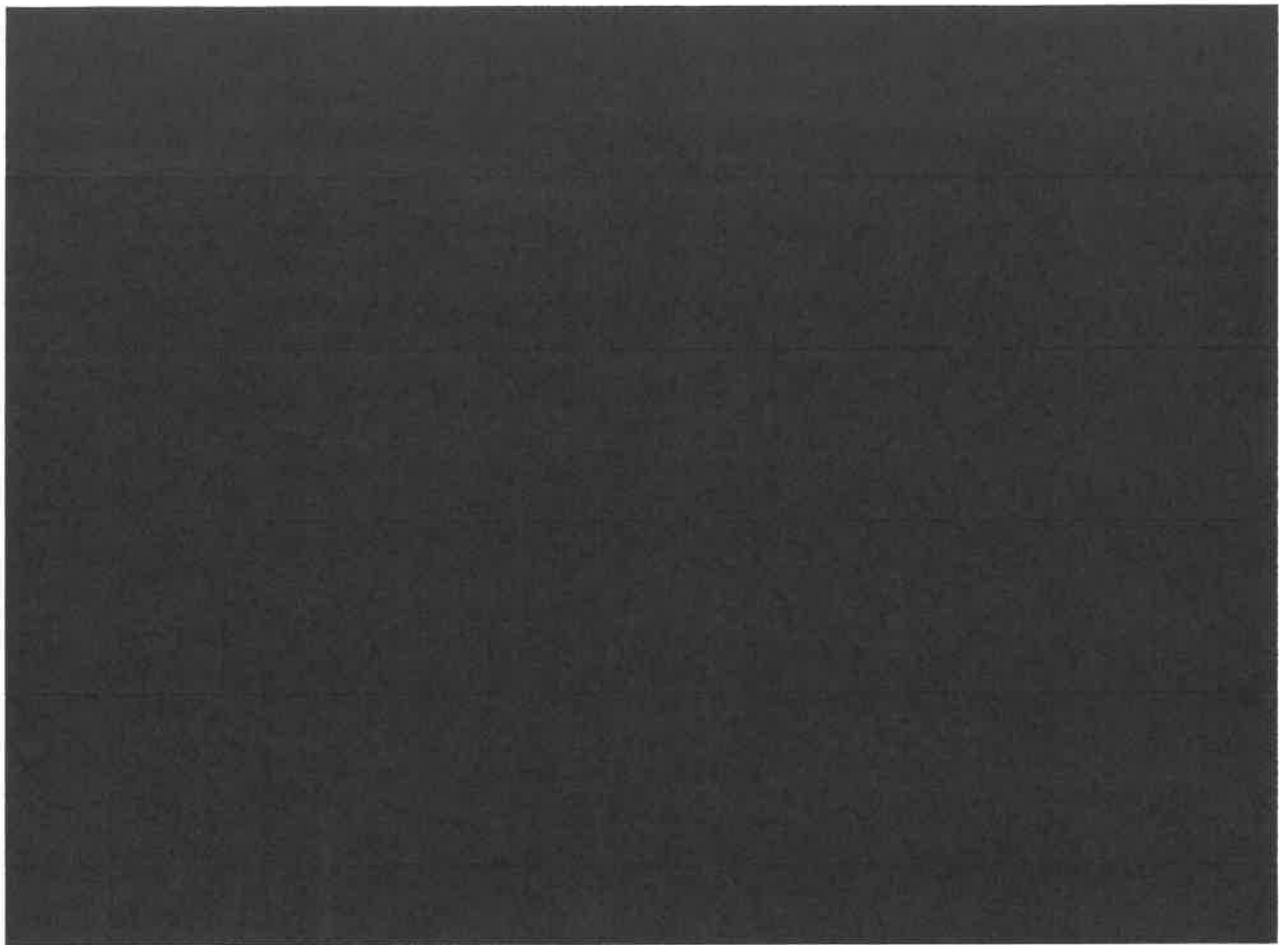
Exhibit "A"
JUSTIFICATION MATRIX

Location (Document name and location of information)	Justification
<u>Minutes of the Audit Committee Meeting of March 16, 2022 of Corix Regulated Utilities (US) Inc.</u>	§367.156: This Commission has previously held that corporate minutes are protected as proprietary business information. See, for example, PSC Order Nos. PSC-2017-0158-CFO-WS, PSC-PSC-2008-0447-PCO-WS and PSC-2003-0410-CFO-WS.
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Minutes
Corix Regulated Utilities (US) Inc.
Audit Committee Meeting

Video Conference Call
March 16, 2022





BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water and
wastewater rates in Charlotte, Highlands,
Lake, Lee, Marion, Orange, Pasco, Pinellas,
Polk, and Seminole Counties by Sunshine Water
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Octavio Simoes-Ponce, Esquire
Austin Watrous, Esquire
Office of Public Counsel
c/o Florida Legislature
111 West Madison Street, Suite 812
Tallahassee, FL 32399-1400
TRIERWEILER.WALT@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
PONCE.OCTAVIO@leg.state.fl.us
WATROUS.AUSTIN@leg.state.fl.us

Ryan Sandy, Esquire
Saad Farooqi, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
sfarooqi@psc.state.fl.us
rsandy@psc.state.fl.us
discovery-gcl@psc.state.fl.us



Martin S. Friedman

COPIES

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