

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Interim and Permanent Rate Increase in Franklin County, Florida by ST. GEORGE ISLAND UTILITY COMPANY, LTD.

DOCKET NO. [REDACTED]-WU
Filed: May 23, 1994

MOTION FOR PROTECTIVE ORDER

FILE COPY

Pursuant to the provisions of Section 367.156(2), Florida Statutes, St. George Island Utility Company hereby requests the issuance of a protective order directing and instructing the Office of Public Counsel and the Citizens of the State of Florida by and through Harold McLean, Public Counsel, to steadfastly maintain a complete confidentiality of the following documents:

- ACK for the years 1990, 1991, 1992 and 1993, which are being produced
- AFA to the Office of Public Counsel pursuant to paragraph 10 of the
- APP Citizens' First Request for Production filed February 11, 1994.
- CAF
- OMC 2. All corporate income tax returns for ABC Management for
- OTM the years 1990, 1991, 1992 and 1993, which are being produced to
- EA the Office of Public Counsel pursuant to paragraph 11 of the
- EB *Leisure w/m*
- MC 3 Citizens' First Request for Production filed February 11, 1994.
- OT 3. All tax returns of the utility/Leisure Properties, Ltd.
- WA 1 and associated workpapers for the years 1978, 1979, 1980, 1981,
- OTH *Willis* 1982, 1983, 1984, 1985 and 1986, which are being produced to the
- Office of Public Counsel pursuant to paragraph 21 of the Citizens' First Request for Production filed February 11, 1994.

FILED
MAY 23 1994
MOS

DOCUMENT NUMBER-DATE
05034 MAY 23 1994
FPSC-RECORDS/REPORTING

4. Copies of Leisure Properties, Ltd.'s income tax returns, G. Brown & Company's income tax returns, Gene D. Brown, P.A.'s income tax returns, Leisure Development's income tax returns, Plantation Realty's income tax returns, St. George Plantation, Inc.'s income tax returns, The Tallahassee Yacht Club, Inc.'s income tax returns, and Covington Properties, Inc.'s income tax returns for the years 1990, 1991, 1992, and 1993, which are being produced to the Office of Public Counsel pursuant to paragraphs 62 through 69 of the Citizens' Second Request for Production filed March 4, 1994.

5. Invoices for the preparation of income tax returns and financial statement for each company with which Mr. Brown is associated/affiliated, which are being produced to the Office of Public Counsel pursuant to paragraph 99 of the Citizens' Third Request for Production filed March 25, 1994.

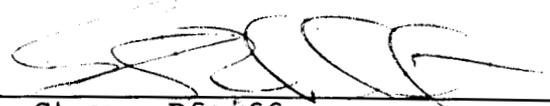
6. Detailed schedule(s) maintained by Leisure Properties, Ltd. with respect to installment sales and profits/losses on installment land sales for the years 1976, 1977, 1978, 1979, and 1980, which are being produced to the Office of Public Counsel pursuant to paragraph 100 of the Citizens' Third Request for Production filed March 25, 1994.

7. The general ledger of Leisure Properties, Ltd. for the years 1976, 1977, 1978, 1979, and 1980, which is being produced to the Office of Public Counsel pursuant to paragraph 101 of the Citizens' Third Request for Production filed March 25, 1994.

As grounds for this motion, the utility would show the Commission that a disclosure of such documents and related information to anyone other than the attorneys and Public Counsel staff handling this document would require the disclosure of proprietary confidential business information, which disclosure should be prohibited pursuant to Section 367.156, Florida Statutes.

The undersigned has been authorized by Harold McLean, counsel for the Office of Public Counsel, to represent that the Office of Public Counsel does not object to the issuance of this Protective Order in accordance with this motion.

Respectfully submitted this 23rd day of May, 1994.



G. Steven Pfeiffer
Florida Bar No. 124400
APGAR, PELHAM, PFEIFFER
& THERIAQUE
909 East Park Avenue
Tallahassee, Florida 32301
Telephone: 904/222-5984

-and-

Gene D. Brown
Florida Bar No. 096262
3848 Killlearn Court
Tallahassee, Florida 32308
Telephone: 904/668-6103

**Attorneys for St. George
Island Utility Company, Ltd.**

