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January 4, 1996

VIA HAND DELIVERY

Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

Re: Peoples Water Service Company of Florida, Inc.;  
Undocketed Audit of Utility Earnings  
Our File No. 31007.01

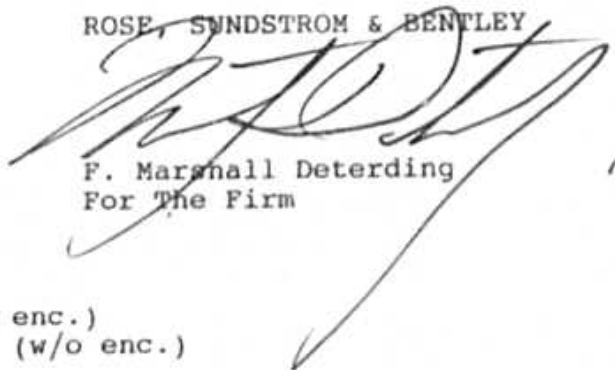
Dear Ms. Bayo:

Attached for filing is the original and 15 copies of a Request for Confidential Treatment for Peoples Water Service Company of Florida, Inc. In accordance with Commission Rule 25-22.006, Florida Administrative Code, we have also attached one highlighted copy and two "blacked-out" copies of the requested confidential information.

Should you have any questions in this regard, please let me know.

Sincerely,

ROSE, SUNDBSTROM & BENTLEY

  
F. Marshall Deterding  
For The Firm

FMD/lts

Enclosures

cc: Denise Vandiver (w/o enc.)  
Sherlock Gillet, Jr. (w/o enc.)

DOCUMENT NUMBER-DATE  
00135 JAN-4 96  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Informal Over Earnings )  
Investigation of PEOPLES WATER )  
SERVICE COMPANY OF FLORIDA, INC. )  
for its water system in Escambia )  
County, Florida. )

Undocketed

960026-1114

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REQUEST FOR CONFIDENTIAL TREATMENT

Peoples Water Service Company of Florida, Inc. (hereinafter "Utility" or "Peoples"), by and through its undersigned attorneys and pursuant to Section 367.156, Florida Statutes, and Commission Rule 25-22.006, Fla. Admin. Code, hereby files this Request For Confidential Treatment, and in support thereof would state and allege as follows:

1. In response to several audit inquiries, Peoples has provided certain employee payroll tax information, parent company information and the original General Ledgers of the parent company in order to assist the Commission Staff in its inquiry into the Utility's current earnings level. The Utility believes the disclosure of this information would cause harm to the Utility's business operations, to the individual employees, and, in turn, to the ratepayers of the Utility. The Utility also believes that such disclosure would be an invasion of the individual employees' privacy.

2. In response to PSC Audit Request No. TAX-1, TAX-2 and TAX-3, the Utility has provided information concerning the consolidated federal income tax return for the parent company to the regulated utility, which includes not only tax data for regulated Florida operations, but also for the unregulated parent

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FPSC-RECORDS/REPORTING

company and the utility operations in Louisiana unregulated by the Florida Public Service Commission.

3. In response to telephonic requests from the PSC Auditor, on July 19, 24, 28, and August 7, and in response to Audit Request No. EXP-2, 3, 4, 5, and 6, and EXT-1, and CSRE-1, the Utility provided information concerning the financial operations data related to the parent company, much of which includes data and information unrelated to the Florida operations directly regulated by the Florida Public Service Commission.

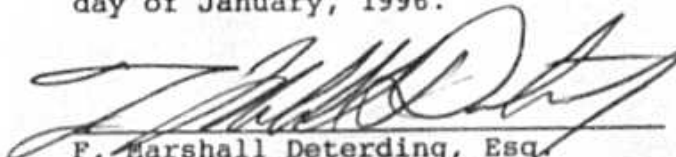
4. In response to telephonic requests from the PSC Auditor on July 19, 1995, the Utility provided the original of its General Ledger for the year ended August 31, 1994 and the four months ended December 31, 1994. This information was to be returned at the conclusion of the audit but has not yet been received. In addition, these documents include substantial information for the unregulated parent company and subsidiaries not subject to the PSC's jurisdiction. Because the audit staff has the originals of these documents, the highlighted versions required by Rule 25-22.006, F.A.C., are not attached.

5. In response to Audit Request No. EXP-1, EXP-2, and EXP-3, the Utility provided information concerning the salaries and wages of individuals employed by both the Utility's Florida operations and in the parent company offices. This included specifics about name, salary and other information concerning deductions and payroll and personnel records for all the employees, both at the Utility and its parent company. While the Commission

certainly has a right and obligation to review information in the Utility records which result in charges to the regulated Utility, Peoples is concerned that the data supplied includes information that is highly personal, not only to all the individual employees of Peoples, but also may tend to place the Utility in a competitive disadvantage for securing labor, as between current employees and potential future employees, and competitors for those employees. The Utility has already determined that its payroll levels are significantly below those for like-skilled persons with similar responsibilities in the market in which it operates and as such, public disclosure of this information may cause damage, not only to the Utility, but to the general body of rate payers.

WHEREFORE, Peoples Water Service Company of Florida, Inc. hereby requests, under the provisions of Section 367.156, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, that the Commission grant confidential treatment to the four categories of documents outlined above in recognition that such information represents proprietary confidential business information, the disclosure of which will be detrimental, not only to the unregulated entities and the employees of the Utility, but to the general body of rate payers as well.

Respectfully submitted this 4th  
day of January, 1996.



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