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REPLY TO ALTAMONTE SPRINGS

MARTIN S. FRIEDMAN, P.A.  
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May 19, 2005

HAND DELIVERY

RECEIVED - FPSC  
MAY 19 PM 12:07  
COMMISSION  
CLERK

Ms. Blanca Bayo  
Commission Clerk and Administrative Services Director  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RE: Docket No.: 050192-WS; Central Sumter Utility Company, L.L.C.'s Application for  
Original Water and Wastewater Certificates  
Our File No.: 38056.01

Dear Ms. Bayo:

CMP \_\_\_\_\_ Enclosed please find for filing the Request for Confidential Classification of Central  
COM \_\_\_\_\_ Sumter Utility Company, L.L.C.

CTR \_\_\_\_\_ Should you have any questions regarding the foregoing responses, please do not  
EDR  hesitate to give me a call.

GCL \_\_\_\_\_

OPC \_\_\_\_\_

MMS \_\_\_\_\_

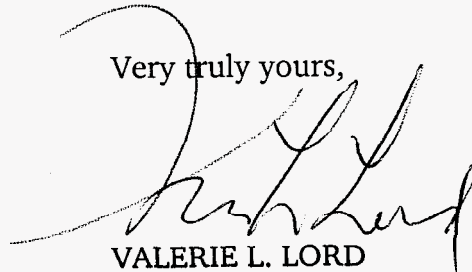
RCA \_\_\_\_\_

SCR \_\_\_\_\_

SEC

OTH / conf VLL / tlc  
records Enclosures

Very truly yours,



VALERIE L. LORD  
For the Firm

cc: Mr. John F. Wise, Chief Financial Officer (w/enclosures)

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of CENTRAL SUMTER  
UTILITY COMPANY, L.L.C. for original  
water and wastewater Certificates in  
Sumter County, Florida

Docket No.: 050192

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

CENTRAL SUMTER UTILITY COMPANY, L.L.C. (*Applicant*), by and through its undersigned attorneys and pursuant to Rule 25-22.006, Florida Administrative Code (*FAC*) and Section 367.156, Florida Statutes, hereby requests confidential classification of certain financial information provided by the Applicant in connection with this Application, and in support shows as follows:

1. On March 22, 2005, the Applicant filed its Application for original water and wastewater certificates in Sumter County, Florida. Included with the Application, pursuant to Rules 25-30.033(1)(s), FAC, the Applicant provided the consolidated financial statements (*Confidential information*) of its parent, The Villages of Lake-Sumter, Inc. (*The Villages*).

2. As a newly-formed entity, the Applicant has no operating history and therefore does not have a basis on which it can independently show its financial ability to provide service as required under Rule 25-30.033(1), FAC. The Applicant provided the Confidential Information for the specific and limited purposes of satisfying the requirements of Rule 25-30.033(1)(s), FAC, and to enable the Commission to determine the ability of The Villages to provide the necessary financial support to the Applicant.

3. The Applicant seeks to have the Confidential Information classified as confidential pursuant to Rule 15-22.006(3), FAC. Although the Commission Staff requires the Confidential Information for the specific and limited purposes set forth in Rule 25-30.033(1)(s), FAC, the Confidential Information should not be made available for inspection and examination by the public under Section 119.07(1), Florida Statutes, for the following reasons:

DOCUMENT NUMBER-DATE

04905 MAY 19 05

FPSC-COMMISSION CLERK

A. The ownership interests in The Villages are closely held and not publicly traded and the Confidential Information is not available to the public.

B. It is not necessary to make the Confidential Information available to the public, and the public will not be harmed in any way by withholding the Confidential Information from public disclosure.

C. The Confidential Information includes financial and other information regarding other affiliates of The Villages which is irrelevant to the determinations to be made by the Commission Staff in connection with the Application and which the Commission does not require in order to discharge its duties and responsibilities.

D. The Confidential Information is not intended to be, nor is it, treated by The Villages as anything but private and confidential information, and has not been disclosed except pursuant to statutory provision, order of a court or administrative body or private agreement that provides that it will not be released to the public.

E. Disclosure of the Confidential Information would cause harm to the owners of The Villages and business operations of The Villages.

F. The Confidential Information contains information concerning contractual data, the disclosure of which would impair the efforts of The Villages, or its affiliates, to contract for goods or services on favorable terms.

G. The Confidential Information contains information relating to the competitive interests of The Villages, the disclosure of which would seriously impair the ability of The Villages to negotiate future acquisitions and receive the fullest commercial benefit from its investments.

H. Disclosure of the Confidential Information would negatively affect the way The Villages' business plans and strategies are carried out.

4. Attached to this Request is (a) a "Justification Table" which specifies what information in the Confidential Information the Applicant asks the Commission to classify as confidential and the statutory justification for the request in compliance with Rule 25-22.006(4)(a) and (c); and (b) one highlighted copy and two redacted copies of the Confidential Information.

5. A copy of the Confidential Information was submitted to the Commission with the Application, and currently located in the Clerk's docket file. The Applicant requests that the copy in the Clerk's docket file be destroyed and replaced with the copies attached to this Request.

WHEREFORE, CENTRAL SUMTER UTILITY COMPANY, L.L.C. respectfully requests that the Commission determine that the Confidential Information is entitled to confidential treatment pursuant to Section 367.156, Florida Statutes, and Rule 25-22.006, FAC, and exempt the Confidential Information from public inspection and examination, destroy the copy which is in the Clerk's docket file and replace it with the copies attached to this Request.

Respectfully submitted on this 18<sup>th</sup> day  
of May, 2005 by:

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By: 

MARTIN S. FRIEDMAN  
VALERIE L. LORD

**JUSTIFICATION TABLE  
DOCKET NO. 050192-WS  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
CENTRAL SUMTER UTILITY COMPANY, L.L.C.**

All Confidential Information was provided in connection with the Application or Original Water and Wastewater Certificate, attached as Exhibit "G".

Description	Page No.	Line/No. Column No.	Florida Statute 367.156(3) Subsection
Letter dated February 2, 2005 from Mr. John F. Wise, Vice President Finance, The Villages	1	Confidential classification not requested	Not applicable
Cover Page -KPMG Consolidated Financial Statements December 2	2	Confidential classification not requested	Not applicable
Letter dated February 4, 2005, from independent accountant, KPMG	3	Confidential classification not requested	Not applicable
Consolidated Financial Statement, including Notes	4 - 18	Unnumbered columns containing confidential information - All	(d), (e) and (f)