

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: August 30, 2013

TO: Division of Engineering, Office of Primary Responsibility

FROM: OFFICE OF COMMISSION CLERK

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NO: 130180-WS DOCUMENT NO: 05047-13

DESCRIPTION: Sunlake (Friedman) - (CONFIDENTIAL) Certain information provided in response to staff's deficiency letter dated 7/26/13.

SOURCE: Sunlake Estates Utilities, L.L.C.

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 18 AUG 30 PM 2:14
 COMMISSION CLERK

The above confidential material was filed along with a request for confidential classification (DN 05047-13). Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
- The utility has provided enough details to perform a reasoned analysis of its request.
- The material has been received incident to an inquiry.
- The material is confidential business information because it includes:
 - (a) Trade secrets;
 - (b) Internal auditing controls and reports of internal auditors;
 - (c) Security measures, systems, or procedures;
 - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company to contract for services on favorable terms;
 - (e) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
 - (f) Tax returns or tax-related information;
 - (g) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.
- The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- The material appears not to be confidential in nature.
- The material is a periodic or recurring filing and each filing contains confidential information.

COM _____
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This response was prepared by Amber Norris (AFD) on 8/30/13, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.

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-M-E-M-O-R-A-N-D-U-M-

DATE: August 30, 2013
TO: Julia Gilcher, Staff Attorney, Office of the General Counsel
FROM: Amber Norris, Public Utility Analyst I, Division of Accounting & Finance
RE: Docket No. 130180-WS – Application for certificates to provide water and wastewater service in Lake County, by Sunlake Estates Utilities, L.L.C.
Request for Confidential Classification for Document No. 05047-13

On August 28, 2013, Sunlake Estates Utilities, L.L.C. (Sunlake or Utility) filed its request for confidential classification for Document No. 05047-13. The document is part of Sunlake's response to a staff deficiency letter, dated July 26, 2013. Certain information produced in response to staff's deficiency letter consists of financial information related to Sunlake's privately-held parent companies, ALL TRS Holding Company and Asset Investors Operating Partnership, L.P. The Utility claims the information is intended to be, and is treated by Sunlake and its parent companies as private and confidential, has not been disclosed externally, and has been strictly controlled internally. Staff has reviewed the document and concurs with the Utility that the nature of the information meets the requirements set forth in Section 367.156, Florida Statutes, whereby disclosure of the information would harm the competitive business interests, operations, and private negotiations of Sunlake's parent companies. Therefore, staff recommends that Sunlake's request for confidential classification of Document No. 05047-13 be approved.