

# RAINTREE WATERWORKS, INC.

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FPSC - COMMISSION CLERK

February 4, 2016

Office of Commission Clerk  
Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

**Re: Docket No. 150199-WU - Application of Raintree Waterworks, Inc. for Staff Assisted Rate Case in Lake County – Response to Staff First Data Request**

Dear Commission Clerk,

Raintree Waterworks, Inc. (Raintree) hereby requests confidential treatment of the response to Staff's First Data Request No. 12 concerning customer service complaints. The information is contained in the attached red envelope.

The information being requested is confidential within the meaning of Section 367.156(3), F.S. This information is treated by Raintree as strictly confidential because this information contains customer-specific proprietary information, the disclosure of which would harm the privacy interests of individual customers and subject those customers to other harm, including potential identity theft. Disclosure of customers' personal account numbers and phone numbers could provide unauthorized access to third parties; thus, potentially harming Raintree and its customers.

Section 367.156, Florida Statutes, authorizes the Commission to keep confidential and exempt from Section 119.07(1), Florida Statutes, "proprietary confidential business information." The Commission has consistently ruled that detailed customer-specific information such as customer name and address are confidential proprietary information, "the disclosure of which would harm the privacy interest of individual customers and deter customers from contacting the Company in the future if such information is subject to public disclosure. See, e.g., In re: Review of Florida Power Corporation's earnings, including effects of proposed acquisition of *Florida Power Corporation by Carolina Power & Light*, 02 F.P.S.C. 3:215, Docket No. 000824-E1, Order No. PSC -02-0356-CFO-E1 (Mar. 15, 2002). Similarly, the Commission has found that disclosure of a utility customer's "personal account numbers could provide unauthorized access to third parties; thus, potentially harming [the utility's] customers." See In re: Request for confidential treatment of certain information contained in draft report setting forth a review of customer deposit procedures of Florida's five investor-owned utilities, by *Progress Energy Florida, Inc.*, 07 F.P.S.C. 6:324, Docket No. 070245-EIY Order No. PSC-07- 0552-CFO-E1 (June 29, 2007).

This information should be considered proprietary confidential information in that is (i) intended to be and is treated as private, confidential information, (ii) because disclosure of the information

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Request of Confidential Classification  
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would cause irreparable harm to Raintree's business operation and its customers, and (iii) the information has not been voluntarily disclosed to the public.

Wherefore, Raintree respectfully request that the requested information be granted confidential classification and treated accordingly. The above utilities request that the information be classified as "proprietary confidential business information" within the meaning of Section 367.156(3), F.S. that, the information remain confidential for a period of at least 18 months as provided in Section 367.156(4), F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

The requested information has been provided in an enclosed sealed red envelope.

Respectfully Submitted,



Troy Rendell  
Manager of Regulated Utilities  
*// For Raintree Waterworks, Inc.*