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June 2, 2016

Via Federal Express

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

**Re: Sunny Shores Water Company, Inc., 3827 116th Street W., Bradenton,
Manatee County, Florida 34210-1139
Docket No. 160023-WU
Notice of Intent to Request Confidential Classification**

Dear Office of Commission Clerk:

This firm represents Sunny Shores Water Company, Inc. ("Sunny Shores") in its Application for Transfer of Majority Organizational Control, Docket No. 160023-WU.

In accordance with Section 367.156, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Sunny Shores files this Notice of Intent to Request Confidential Classification of documents to be produced in response to the request by the Florida Public Service Commission (the "PSC"), dated February 15, 2016. Specifically, the PSC has requested that Sunny Shores' owners, Jack E. Mason to Jack E. Mason, II and Debbie A. Mason provide their personal financial statement. The personal financial statement contains "proprietary confidential business information," in that it contains "information that is intended to be and is treated by the company as private, in that disclosure of the information would cause harm to the company's ratepayers or business operations, and (that the information) has not been voluntarily disclosed to the public."¹

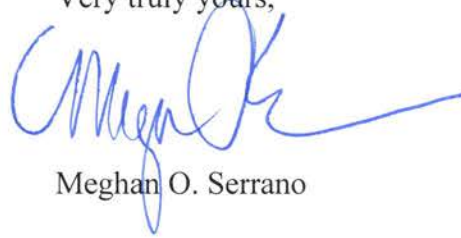
Additionally, and in accordance with Rule 25-22.006(3)(a)(1), Florida Administrative Code, enclosed please find Sunny Shores' Request for Confidential Classification for the personal financial statement, attached to which as Confidential Exhibit A is a sealed envelope containing the personal financial statement.

¹ See Order No. PSC-06-0852-CFO-WS, Docket No. 050595-WS, In Re: Application for certificates to provide water and wastewater service in Polk County by Four Points Utility Corporation (October 12, 2006); see also Section 367.156, Florida Statutes; Rule 25-22.006, Florida Administrative Code.

Office of Commission Clerk
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For our records, please acknowledge receipt of this filing on the enclosed copy of this letter and return it to me in the enclosed envelope. Thank you for your consideration.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Meghan O. Serrano', with a long horizontal flourish extending to the right.

Meghan O. Serrano

MOS:cs

Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for transfer of majority organizational control by Sunny Shores Water Company, Inc. | DOCKET NO. 160023-WU
| FILED: June 2, 2016

REQUEST FOR CONFIDENTIAL CLASSIFICATION

Sunny Shores Water Company, Inc. (“Sunny Shores”), the Applicant in the above-referenced matter, by and through its undersigned counsel and pursuant to Section 367.125, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, requests that the Florida Public Service Commission (the “Commission”) classify as confidential the attached Confidential Exhibit A to the Application for Transfer of Majority Organizational Control (the “Application”). In support of its request, Sunny Shores states:

1. Sunny Shores filed its original Application on January 15, 2016, on Commission Form PSC/ECR 015-R (Rev. 2/91). Thereafter, the Commission issued a response on February 15, 2016 (the “Request”), requesting corrected and additional information from Sunny Shores. Item 9 of the Request requires Sunny Shores provide “a detailed financial statement representing the financial condition of the applicant[s].” In subsequent communications, the Commission stated that in this Request, it was seeking the “personal financial statements” of Sunny Shores’ owners, Jack E. Mason to Jack E. Mason, II and Debbie A. Mason.

2. Pursuant to that requirement, attached hereto is Confidential Exhibit A to the Application, which is the unaudited personal financial statement of Sunny Shores’ owners, Jack E. Mason to Jack E. Mason, II and Debbie A. Mason, who are the intended transferees in the Application. The information contained in Confidential Exhibit A is entitled to confidential

classification pursuant to Section 367.156, Florida Statutes, and is exempt from Section 119.07, Florida Statutes, because it is “proprietary confidential business information.”

3. Section 367.156(3), Florida Statutes, defines “proprietary confidential business information” as:

information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person’s or company’s business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or a private agreement that provides that the information will not be released to the public.

4. Confidential Exhibit A contains information which (i) is intended to be and is treated by the Applicant as private, and (ii) has not been voluntarily disclosed to the public. As such, and in accordance with prior Commission rulings, Confidential Exhibit A should be classified as confidential under Section 367.156, Florida Statutes. See e.g. Order No. PSC-06-0852-CFO-WS, Docket No. 050595-WS, In re: Application for certificates to provide water and wastewater service in Polk County by Four Points Utility Corporation (October 12, 2006) (“Upon review, it appears that the above-referenced information contained in Exhibit 4 of the application [—the unaudited financial statement of the utility’s owner—] satisfies the criteria set forth in Section 367.156, Florida Statutes, for classification as proprietary confidential business information and, thus, shall be treated as confidential”).

5. Pursuant to Rule 25-22.006, Florida Administrative Code, attached hereto in a sealed envelope is a copy of Confidential Exhibit A. Because Confidential Exhibit A is confidential in its entirety pursuant to Section 367.156(3), Florida Statutes, there is no basis for articulating a line-by-line justification for the confidential treatment of the information contained therein.

WHEREFORE, Sunny Shores respectfully requests that the information contained in the attached Confidential Exhibit A be classified as confidential and exempt from the Public Records Act, Chapter 119, Florida Statutes. Sunny Shores further requests that the confidential information in Confidential Exhibit A be classified by PSC as confidential for the maximum period of time allowed, and that Confidential Exhibit A be returned promptly to Sunny Shores upon closure of this docket.

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Attorneys for Sunny Shores Water Company, Inc.

By: /s/ Meghan O. Serrano
Meghan O. Serrano
Florida Bar No. 53124

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT a true and correct copy of the foregoing was furnished to the Office of Commission Clerk, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

By: /s/ Meghan O. Serrano
Meghan O. Serrano
Florida Bar No. 53124