

# DEAN MEAD

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April 25, 2022  
VIA FEDEX

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

**REDACTED**

RE: Docket No.: 2022\_\_\_\_-WS; Application for original water and wastewater certificates by  
Middleton Utility Company, LLC in Sumter County

Dear Mr. Tietzman:

On behalf of Middleton Utility Company, LLC, today I have e-filed the Application for  
Original Water and Wastewater Certificates and Rates and Charges with Exhibits. In connection  
with that Application enclosed is a Request for Confidential Classification.

Our firm's check in the amount of \$6,000.00 representing the appropriate filing fee is  
also enclosed.

Should you have any questions, please do not hesitate to give me a call.

Very truly yours,



MARTIN S. FRIEDMAN  
For the Firm

RECEIVED-FPSC  
2022 APR 27 AM 10:10  
COMMISSION  
CLERK

MSF/

cc: Trey Arnett (via e-mail)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for original water  
and wastewater Certificates by Middleton  
Utility Company, LLC in Sumter County /

DOCKET NO.: 2022\_\_\_\_-WS

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

MIDDLETON UTILITY COMPANY, LLC (“*Applicant*”), by and through its undersigned attorneys and pursuant to Rule 25-22.006(4), Florida Administrative Code (“*FAC*”) and Section 367.156, Florida Statutes, hereby requests confidential classification of certain financial information provided by the Applicant in its Application, and in support shows as follows:

1. Applicant is providing the Balance Sheet and Income Statement (“*Confidential information*”) of its parent, Holding Company of The Villages, Inc. (“*The Villages*”) in support of the financial ability to provide utility service.

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)(h), FAC. The Applicant is providing the Confidential Information for the specific and limited purposes of satisfying the requirements of Rule 25-30.033(1)(h), 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 25-22.006(3), FAC. Although the Commission Staff requires the Confidential Information for the specific and limited purposes set forth in Rule 25-30.033(1)(h), 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:

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

4. Exhibit "A" to this Request is 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), (b) and (c), FAC; one highlighted copy and one redacted copy of the Confidential Information.

WHEREFORE, MIDDLETON UTILITY COMPANY, LLC 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.

Respectfully submitted on this 25<sup>th</sup> day of April, 2022, by:

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/s/Martin S. Friedman  
MARTIN S. FRIEDMAN

**Exhibit "A"**  
**JUSTIFICATION MATRIX**

Location (Document name and location of information)	Justification
<p><b><u>Income Statement and Balance Sheet:</u></b></p> <p><b><u>Location:</u></b> The amounts under all columns</p>	<p>§367.156(3)(a),(b),(d) &amp; (e): As set forth in the Request and the disclosure of the financial statements of Holding Company of The Villages, Inc., which is not a public company and is not subject to public disclosure of its financial statements would impair its competitive interests, could be used to discern trade secrets, or harm its ability to contract for goods and services on a favorable basis. Holding Company of The Villages, Inc., keeps this information strictly confidential also to prevent competitors and prospective counterparties from information which could be used in future negotiations to the disadvantage of Holding Company of The Villages, Inc. and its affiliates.</p>

# The Villages

## Balance Sheet

The Villages Land Holding Co. LLC and Subsidiaries  
As of December 2021

### Assets

Cash  
Accounts & Notes Receivable  
Inventories  
Prepaid Expenses

### Fixed Assets

Construction in Process  
Land  
Fixed Assets  
Accumulated Depreciation

### Net Fixed Assets

### Other Assets

Due from Affiliates  
Other Assets  
Investments

### Other Assets Total

### Total Assets

### Liabilities and Equity

Due to Affiliates  
Accounts Payable and Accrued Expenses  
Customer Deposits

### Members' Equity

Members' Equity  
Retained Earnings

### Total Stockholders Equity

### Total Liabilities & Equity

# The Villages

## Income Statement

The Villages Land Holding Co. LLC and Subsidiaries  
For the Year Ending December 2021

### Revenues

Revenues

### Total Revenues

Cost of Goods Sold

### Gross Profit

Selling, General & Administrative

### Operating Profit

Interest Income

Interest expense

Developer Fee Expense - Related Parties

IP Expense-Related Parties

Loan Guarantee Fees - Related Parties

Depreciation expense

Other Income/(Expense)

### Other Income & Expense

### Net Profit

