

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water and
wastewater rates in Charlotte, Highlands,
Lake, Lee, Marion, Orange, Pasco, Pinellas,
Polk, and Seminole Counties by Sunshine Water
Services Company

DOCKET NO. 20240068-WS

**SUNSHINE WATER SERVICES COMPANY'S MOTION FOR PROTECTIVE ORDER
AND REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Sunshine Water Services Company ("Utility") by and through its undersigned counsel, and pursuant to Rules 25-22.006(4) & (6), Florida Administrative Code, files this Motion for Protective Order and Request for Confidential Classification with regard to a document responsive to Staff's Third Set of Interrogatories #71 ("Confidential Information").

The response to the Staff's Third Set of Interrogatories #71, the Utility provided a copy of the Audited Consolidated Financial Statement of its parent, Corix Regulated Utilities (US), Inc. ("CRU"). The Utility seeks to have the Confidential Information classified as confidential pursuant to Rule 25-22.006(3), 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 CRU 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 CRU which is irrelevant to the determinations to be made by the Commission 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 CRU 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 CRU and business operations of CRU.

F. Disclosure of the Confidential Information would negatively affect the way CRU's business plans and strategies are carried out.

Under Section 367.156, Florida Statutes, this Commission has the authority to classify certain material as proprietary confidential business information thereby exempting the material from public disclosure under Section 119.07(1), Florida Statutes.

Rule 25-22.006(6)(a), Florida Administrative Code, permits a utility to request a Protective Order protecting proprietary confidential information from discovery.

Pursuant to Rule 25-22.006(6)(b), Florida Administrative Code, the Confidential Information is exempt from Section 119.07(1), Florida Statutes, pending the Commissions' ruling on this Motion.

Highlighted and redacted copies of the Confidential Documents are provided to the Clerk with this Motion. The Justification Schedule is attached.

Upon a finding by the Commission that the information is proprietary and confidential business information, the information should not be declassified for at least 18 months and should be returned to the undersigned as soon as it is no longer necessary for the Commission to conduct its business.

WHEREFORE, Sunshine Water Services Company requests the Commission enter a Protective Order against public disclosure of the Confidential Information provided by the Utility in

response to Staff's Third Set of Interrogatories #71, and to determine the document is proprietary confidential information.

Respectfully submitted this 24th day of January, 2025.

DEAN MEAD
420 South Orange Ave., Suite 700
Orlando, FL 32801
Direct Telephone: (407) 310-2077
Fax: (407) 423-1831
mfriedman@deanmead.com

A handwritten signature in blue ink, appearing to read "Martin S. Friedman".

Martin S. Friedman, Esquire
John L. Wharton, Esquire

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to the following parties this 24th day of January, 2025:

Walt Trierweiler, Esquire
Charles J. Rehwinkel, Esquire
Octavio Simoes-Ponce, Esquire
Austin Watrous, Esquire
Office of Public Counsel
c/o Florida Legislature
111 West Madison Street, Suite 812
Tallahassee, FL 32399-1400
TRIERWEILER.WALT@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
PONCE.OCTAVIO@leg.state.fl.us
WATROUS.AUSTIN@leg.state.fl.us

Ryan Sandy, Esquire
Saad Farooqi, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
sfarooqi@psc.state.fl.us
rsandy@psc.state.fl.us
discovery-gcl@psc.state.fl.us



Martin S. Friedman

JUSTIFICATION SCHEDULE

Document Name	Line/Col.	Legal Citation
<u>Parent Company Financial Statement</u>	All information other than the filing party information at the top of the first page	§367.156(3)(a),(b),(d) & (e): As set forth in the Request and the disclosure of the Financial Statement of CRU, 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. CRU 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 CRU and its affiliates.

Corix Regulated Utilities (US) Inc. and Subsidiaries

Consolidated Financial Statements
December 31, 2023 and 2022

Ernst & Young LLP



Corix Regulated Utilities (US) Inc. and Subsidiaries

Index

	Page
Report of Independent Auditors	1
Consolidated Statements of Operations for the Years Ended December 31, 2023 and 2022	2
Consolidated Balance Sheets as of December 31, 2023 and 2022	3
Consolidated Statements of Changes in Shareholder's Equity for the Years Ended December 31, 2023 and 2022	4
Consolidated Statements of Cash Flows for the Years Ended December 31, 2023 and 2022	5
Notes to Consolidated Financial Statements	6



Ernst & Young LLP
155 North Wacker Drive
Chicago, IL 60606-1787

Tel: +1 312 879 2000
Fax: +1 312 879 4000
ey.com

Report of Independent Auditors

The Board of Directors and Shareholder
Corix Regulated Utilities (US) Inc. and Subsidiaries

Opinion

We have audited the consolidated financial statements of Corix Regulated Utilities (US) Inc. and Subsidiaries (the Company), which comprise the consolidated balance sheets as of December 31, 2023 and 2022, and the related consolidated statements of operations, changes in shareholder's equity and cash flows for the years then ended, and the related notes (collectively referred to as the "financial statements").

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Company at December 31, 2023 and 2022, and the results of its operations and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audits in accordance with auditing standards generally accepted in the United States of America (GAAS). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Company and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free of material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Company's ability to continue as a going concern for one year after the date that the financial statements are available to be issued.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free of material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgement made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS, we:

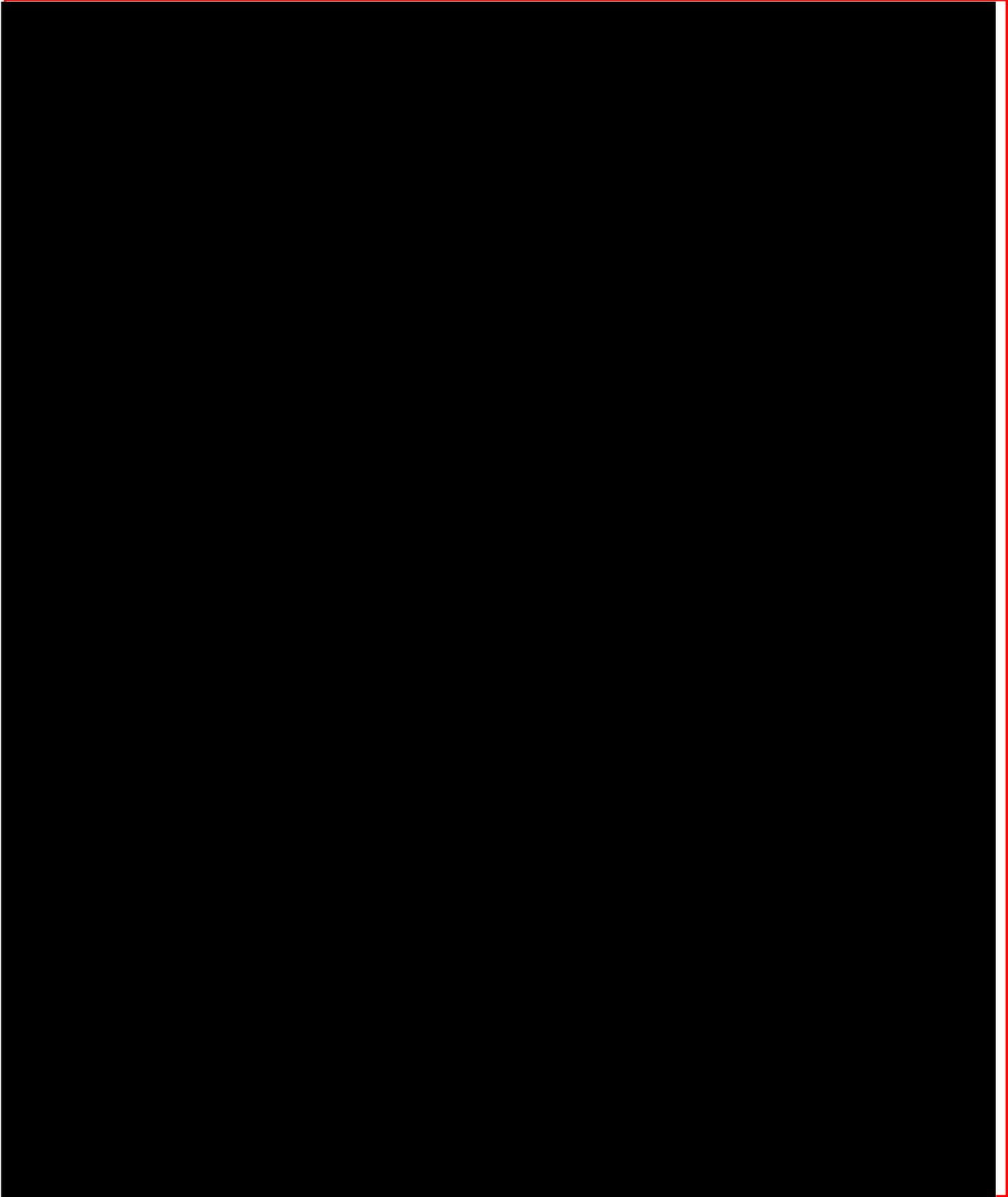
- Exercise professional judgement and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgement, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Company's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Ernst & Young LLP

March 29, 2024

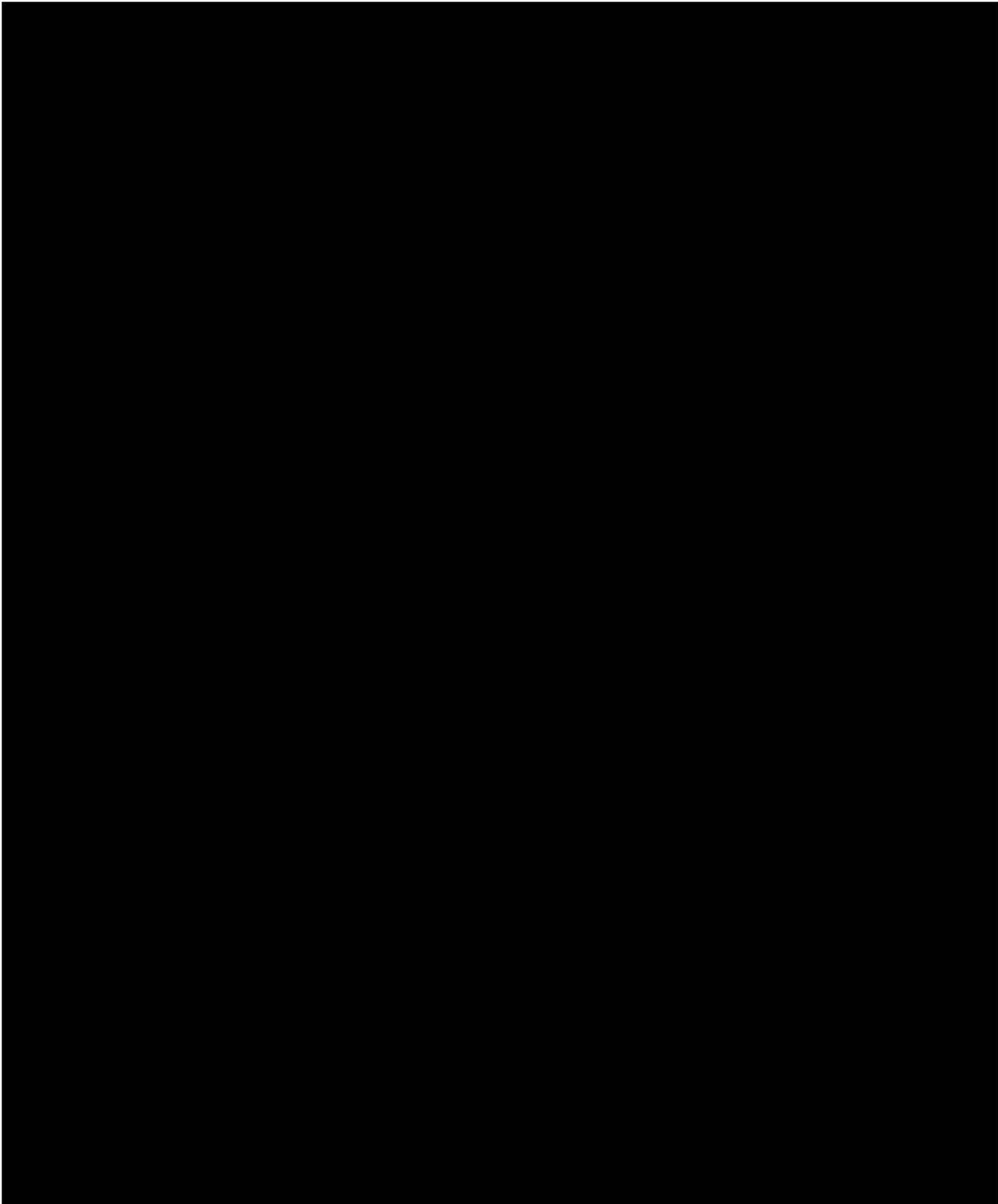
Corix Regulated Utilities (US) Inc. and Subsidiaries
Consolidated Statements of Operations
(In thousands)



Corix Regulated Utilities (US) Inc. and Subsidiaries

Consolidated Balance Sheets

(In thousands, except share and per share amounts)



Corix Regulated Utilities (US) Inc. and Subsidiaries
Consolidated Statements of Changes in Shareholder's Equity
(In thousands, except share amounts)

Corix Regulated Utilities (US) Inc. and Subsidiaries
Consolidated Statements of Cash Flows
(In thousands)

