Commissioners: SUSAN F. CLARK, CHAIRMAN J. TERRY DEASON JULIA L. JOHNSON DIANE K. KIESLING JOE GARCIA

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DIVISION OF WATER & WASTEWATER CHARLES HILL DIRECTOR (904) 413-6900

Public Service Commission

July 10, 1995

Mr. Brian P. Armstrong Southern States Utilities. Inc. 1000 Color Place Apopka, Florida 32703

> Re: Docket No. 950495-WS, Application For Increased Water and Wastewater Rates by Southern States Utilities, Inc. and Orange/Osceola Utilities, Inc.

Dear Mr. Armstrong:

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We have reviewed the company's application including the minimum filing requirements submitted on June 28, 1995, on behalf of the above mentioned utilities. After reviewing this information, we find the filing to be incomplete and the minimum filing requirements to be deficient. The specifics are identified below.

The utility has requested that uniform rates be established in this proceeding but has failed to file all of the information necessary for that request to be considered. Because of the decision by the Commission in Docket No. 930945-WS, the utility's facilities and land constitute a single system. Accordingly, the application should be modified to include ACKHernando, Hillsborough and Polk counties. Until this information is filed the application AFAmust be considered lacking and therefore incomplete.

 $A^{P}P$ Further, the minimum filing requirement deficiencies are as follows:

Schedule A-16(S), Interim Test Year Ended 12/31/95 (Lehigh). This schedule does not tie to Schedule A-2(S), or Schedule A-7(S). The schedule provided shows 1996 numbers for Sewer Advances for Construction instead of the 1995 numbers.

.2. AFPI Schedule 3. The total compounded earnings is incorrect. calculated without including the return on expenses for the current year.

It is rect. 3. AFPI Schedule G-3 (W). The earnings expansion factor for taxes is incorrect. It-should be 1.30 instead of 3.90.

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4. All Schedules A-16. These schedules must include a brief description of the company's policy regarding advances as required by the instructions.

5. Schedules A-5, A-6, A-9, A-10, A-11, A-12, and A-14. The 12/31/94 balance per books for the Historical Year Ended 12/31/94 (Vol III, Book 5 of 6; Vol III, Book 6 of 6) does not agree with the 12/31/94 balance per book for the projected year ended 12/31/95 (Vol III, Book 3 of 6; Vol III, Book 4 of 6). In addition, the 12/31/95 balance per books for the projected year ended 12/31/95 (Vol III, Book 3 of 6; Vol III Book 4 of 6) does not agree with the 12/31/95 balance per books for the projected test year ended 12/31/96 (Vol III, Book 1 of 6; Vol III, Book 2 of 6). Revise schedules or provide information explaining differences.

6. Volume V, Book 1 of 1, Schedules Nos. E2-3 on pages 371, 423, 651 & 691. Theses schedules were offered as a Summary of Revenue Reconciliations, however the column titles in the table are not explained. Additional information must be provided to explain these differences between the calculated revenues and the booked revenues.

7. Volume VIII, Book 1 of 4, page 87. Pursuant to Rule 25-30.565(4)(k), Florida Administrative Code, the company did provide an estimate of the contributed property, but did not provide a description of this property.

8. Volume VIII, Book 1 of 4, page 89. The utility did not provide a timetable for the proposed plant expansions pursuant to Rule 25-30.565(4)(0), Florida Administrative Code.

9. Volume VIII, Books 1, 2 and 3 of 4. These books contain pages and tariffs that do not include the correct meter installation charge for 3/4" meters and contain the wrong meter installation charges for 1", 1 1/2", 2" and over 2" meters.

Your petition will not be deemed filed until we have received the above mentioned information. These corrections should be submitted no later than August 10, 1995.

Sincerely. They 14 CC

Charles H. Hill Director

CHH/MWW

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c: Division of Records and Reporting Division of Legal Services (Jaber, O'Sullivan) Division of Water and Wastewater (Willis, Merchant, Crouch, Rendell)