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Public Service Commission

September 22, 2010

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Mr. Bruce May  
Holland & Knight, LLP  
315 South Calhoun Street, Suite 600  
Tallahassee, FL 32301

**Re: Docket No. 100330-WS - Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Hardee, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.**

Dear Mr. May:

We have reviewed the minimum filing requirements (MFRs) submitted on September 1, 2010, on behalf of Aqua Utilities Florida, Inc. (AUF). After reviewing this information, we find the MFRs to be deficient. The specific deficiencies are identified below.

1. Schedule D-2, Reconciliation of Capital Structure to Requested Rate Base

For all rate bands and stand-alone systems, Schedule D-2 does not show the specific or pro rata adjustments in reconciling to the requested rate bases for AUF's respected rate bands and stand-alone systems as required by the MFR instructions. Schedule D-2 needs to include the capital structure and the specific and pro rata adjustments to arrive at each rate band's and stand-alone system's capital structure. Pursuant to Rule 25-30.437, Florida Administrative Code (F.A.C.), please provide a reconciliation of the 13-month average capital structure to the requested rate base of each rate band and stand-alone system.

2. Schedule B-3, Schedule of Adjustments to Operating Income

For water rate band 4, the Pro Forma Tangible Net Plant Additions found on Schedule B-3 does not tie to the Net Plant Additions found on Schedule A-3.

3. Plant Operating Reports. Pursuant to Rule 25-30.440(4), F.A.C., all water and wastewater plant operating reports for the test year and the year preceding the test year must be submitted with the application. Please provide the operating reports for the following systems for each listed month.

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Ravenswood WTF: Oct. 2008 MOR  
Palm Terrace WWTF: Oct. 2008 DMR  
Morningview WTF: Sept. 2008 MOR  
Silver Lake Oaks WTF: Aug. 2009 MOR  
Lake Suzy WTF: Apr. 2010 MOR Daily Sample Results – Part B  
Chappell Hills WTF: Jan. – Apr. 2010 MORs  
Piney Woods / Spring Lake Manor WTF: Jan. – Apr. 2010 MORs

4. Sanitary Surveys and Inspection Reports. Pursuant to Rule 25-30.440(5), F.A.C., the most recent sanitary survey for each water plant and inspection report for each wastewater plant conducted by the health department or the Department of Environmental Protection (DEP) must be submitted with the application. Several cover letters from the health departments or the DEP were submitted without the accompanying copy of the sanitary survey or inspection report. Please provide the most recent sanitary survey or inspection report for the following systems.

Breeze Hill WTF  
Lake Gibson Estates WTF  
Breeze Hill WWTF  
Rosalie Oaks WTF

Village Water WTF  
Gibsonia Estates WTF  
Orange Hill / Sugar Creek WTF

5. Additional Engineering Information for Bellaire WTF. The required additional engineering information for the Bellaire WTF was omitted from Volume 5 Book 2 of the filing. Please provide the relevant permit, monthly operating reports, sample results, and correspondence for the facility pursuant to Rule 25-30.440, F.A.C.
6. Volumes of Water Sold in Schedules F-1 and E-2w. The volumes of water sold reflected in Schedule F-1 for Bands 1W, 2W, and 4W, do not match the corresponding values reflected in Schedule E-2w.

If any above corrections require a corresponding change to any MFR schedules, those corrected schedules must also be submitted. Your petition will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than October 29, 2010.

Sincerely,



Marshall Willis  
Director

cc: **Office of Commission Clerk**  
Office of the General Counsel (Fleming, Jaeger, Klancke)  
Division of Economic Regulation (Bulecza-Banks, Maurey, Fletcher, Daniel, Stallcup, Deason, Rieger, Walden, Williams, Thompson, Simpson, Lingo, Mouring, Cicchetti)  
Office of Auditing and Performance Analysis (Prestwood)