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Public Service Commission

April 27, 2012

RECEIVED-FPSC
APR 30 AM 9:00
COMMISSION
CLERK

Martin S. Friedman, Esquire
Sundstrom, Friedman & Fumero, LLP
766 North Sun Drive, Suite 4030
Lake Mary, FL 32746

Re: Docket No. 120037-WS - Application for increase in water and wastewater rates in Lake County by Utilities, Inc. of Pennbrooke.

Dear Mr. Friedman:

We have reviewed the minimum filing requirements (MFRs) submitted on March 29, 2012, on behalf of Utilities, Inc. of Pennbrooke (Pennbrooke or Utility). After reviewing this information, we find the MFRs to be deficient. The specific deficiencies are identified below:

1. Regarding MFR Schedule A-15 (Annual AFUDC), the Utility is required to provide a description of practices and authority of rate(s) used. Please revise MFR Schedule A-15 to include a description of practices and authority in support of the stated AFUDC rate, namely the Commission order granting said AFUDC rate.
2. Regarding MFR Schedule B-7 and Schedule B-8 (Operation and Maintenance Expense Comparison), the Utility is required to utilize the Consumer Price Index All Urban Consumers Table (CPI - U) percentages published by the U.S. Department of Labor. The CPI-U amounts found on MFR Schedules B-7 and B-8 are incorrect. Please revise Schedules B-7 and B-8 to reflect 210.228 and 226.889 for December 2008 and September 2011, respectively.
 - a. In addition, the Utility is required to provide an explanation of all differences in excess of the benchmark factor for customer growth and inflation. When revising MFR Schedules B-7 and B-8, please provide an explanation for expenses in excess of the revised benchmark factor.
 - b. The Utility is required to fully complete all schedules. MFR Schedule B-8, Line 29, incorrectly indicates that there was no percentage difference in total customers. Please revise MFR Schedule B-8, Line 29, rounding to four decimal places, to accurately reflect the applicable percentage change.

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3. Regarding MFR Schedule E-3 (Customer Monthly Billing), the number of customers, as of December 31, 2010, provided by the Utility does not equal the number of water and wastewater customers reflected in its 2010 Annual Report. Pursuant to Rule 25-30.110(2), F.A.C., please provide the reconciliation of the number of customers in the 2010 Annual Report and MFR Schedule E-3.

If any above corrections require a corresponding change to any other 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 May 29, 2012.

Sincerely,

*by
AKB*
Marshall Willis

Marshall Willis
Director

MW/ao

cc: Division of Economic Regulation (Bulecza-Banks, Maurey, Fletcher, Beeler, Brown, Daniel, Rieger, Stallcup)
Office of the General Counsel (Jaeger)
Office of Commission Clerk (Docket No. 120037-WS)