

120259-WS

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October 16, 2012

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center
Room 110
Tallahassee, FL 32399-0850

HAND DELIVERY

Re: Ni Florida, LLC's Request for Approval to Maintain Accounting Records Outside Florida

Dear Ms. Cole:

Enclosed for filing on behalf of Ni Florida, LLC are the original and fifteen copies of the above-referenced Request for Approval to Maintain Accounting Records Outside Florida.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,



Marsha E. Rule

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MER/rl
Enclosures

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request of Ni Florida, LLC for authorization to maintain accounting records outside of Florida pursuant to Rule 25-30.110(1), Florida Administrative Code

Docket No. 120259-WS

Filed: October 16, 2012

NI FLORIDA, LLC'S REQUEST FOR APPROVAL TO MAINTAIN ACCOUNTING RECORDS OUTSIDE FLORIDA

Ni Florida, LLC ("Ni Florida") by and through the undersigned attorneys, hereby seeks approval pursuant to Rule 25-30.110 (1)(b), Florida Administrative Code, to maintain certain records outside of Florida. In support, Ni Florida states:

1. Ni Florida is a water and wastewater utility with its principal offices located at 10913 Metronome Drive, Houston, Texas 77043-2201.

2. The name and mailing address of the persons authorized to receive notices is:

Marsha E. Rule
marsha@reuplaw.com
Martin P. McDonnell
marty@reuphlaw.com
Rutledge Ecenia
119 South Monroe St., Suite 202
Tallahassee, FL 32301
Phone: 850.681.6788
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3. Ni Florida is a limited liability company whose single member is Ni America Capital Management, LLC. Ni America Capital Management provides accounting and other services for all regulated water and wastewater utilities owned by its subsidiaries in Florida, Texas and South Carolina. Centralizing this function reduces costs that would otherwise be

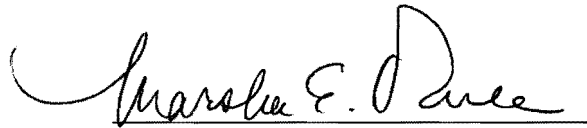
incurred by each individual utility, and maintaining duplicate records within Florida would create an additional and unnecessary expense. Accordingly, Ni Florida seeks Commission approval to maintain accounting records at its principal offices, located at 10913 Metronome Drive, Houston, Texas 77043-2201.

4. In addition, Ni Florida seeks approval to maintain customer billing records at the office of Ni America Capital Management's subsidiary located at 1713 Woodcreek Farms Road; Suite A, Elgin, South Carolina, 29045. Approximately 90% of the customers served by Ni Capital Management subsidiaries are located in South Carolina and are served through the centralized customer response system provided from this location. Moving and consolidating Ni Florida's customer billing function will permit more efficient and cost-effective service.

5. Ni Florida has responded promptly to requests by Florida Public Service Commission staff for records and data in the past, and will continue to do so. Ni Florida will make its out-of-state records available to staff electronically whenever possible. If such records cannot be provided electronically, Ni Florida will either provide a physical copy of the records or will reimburse the Commission for reasonable travel expenses incurred by Commission staff if necessary to review out-of-state records, as required by Rule 25-30.110 (l)(c), Florida Administrative Code.

WHEREFORE, Ni Florida, LLC respectfully requests that the Commission allow the Company to maintain accounting records at its principal offices in Houston, Texas, and to maintain customer records at the location set forth above, in Elgin, South Carolina.

Respectfully submitted this 16th day of October, 2012.

A handwritten signature in cursive script, reading "Marsha E. Rule". The signature is written in black ink and is positioned above a horizontal line.

Marsha E. Rule
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