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Via Hand Delivery

Chairman Brisé
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

130010-WS

RECEIVED-FPSC
13 JAN -2 PM 12:54
COMMISSION CLERK

Re: Ni Florida, LLC
Application for increase in water rates in Lee County (WU 920) and wastewater rates in Pasco County (SU 915)

Dear Chairman:

Pursuant to Rule 25-30.430, Florida Administrative Code, please consider this correspondence a formal request for approval of a test year for Ni Florida, LLC ("Ni Florida"). Ni Florida intends to submit an application for general rate relief to the Florida Public Service Commission for its water and wastewater systems located in Florida. The company intends to submit the Minimum Filing Requirements ("MFRs") on or before January 31, 2013. The company's last effective rate proceeding for the water system in Lee County was in Docket No. 100149 which culminated in Order No. PSC-11-0199-PAA-WU issued April 22, 2011.¹ The company's last effective rate proceeding for its wastewater facility in Pasco County, Florida was in Docket No. 090182-SU which culminated in Order No. PSC-10-0168-PAA-SU issued March 23, 2010.

Ni Florida requests an historic test year ending September 30, 2012. The requested test year is representative of a normal full year of operation.

The MFRs will include pro forma adjustments for capital expenditures, purchased wastewater treatment expense due to increased wastewater flow, processing fees for a new online bill payment option, increased bad debt expense, purchased water due to a price increase, a wastewater cleaning program and legal fees related to a prior rate case. The amounts of the estimated pro forma adjustments are attached hereto as Exhibit A.

¹ On September 19, 2012, Ni Florida filed a formal request for approval of a test year of December 31, 2011 in anticipation for filing for general rate relief in both its water and wastewater systems. On November 27, 2012, prior to filing the MFRs, Ni Florida withdrew its request for filing the rate case and the docket was administratively closed on November 28, 2012. (Docket No. 120235)

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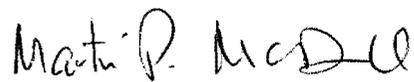
FPSC-COMMISSION CLERK

RUTLEDGE ECENIA

Pursuant to section 367.01(8), Florida Statutes, Ni Florida requests that the Commission process the petition for rate relief using the proposed agency action procedure.

Should you or any member of the staff have any questions regarding this request, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Martin P. McDonnell". The signature is written in a cursive style with a large initial 'M' and a distinct 'P'.

Martin P. McDonnell

MPM/vp
Attachment (Exhibit A)

NI FLORIDA, LLC
PRO FORMA ADJUSTMENTS

Plant in Service – Sewer - \$367,500 (Capital Expenditures to be completed by March 31, 2013)

Operation and Maintenance (O&M)-Water

Purchases Water	\$5,615 (to reflect price change)
Bank Charges	4,893 (to reflect charges for the new Payment Processing System)
Bad Debts	3,079 (to reflect higher bad debt expense)
Legal Expenses related to prior rate case	(103) (to adjust legal expense)

Operation and Maintenance (O&M) – Sewer

Purchases Treatment	\$ 19,200 (to annualize price increase)
Contract Line Cleaning Program	100,000 (to uncover and repair I & I issues)
Bank Charges	17,992 (to reflect charges for the new Payment Processing System)
Bad Debts	(43,610) (to reflect lower bad debt expense)

\\Ni Florida\2proforma.list.doc

