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February 2, 2024

VIA E-PORTAL

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20240022 - WS - Proposed amendment of Rule 25-30.0371, FAC, Acquisition Adjustments [Statement of Estimated Regulatory Costs (SERC) Data Request for Proposed Amendment of Rule 25-30.0371, Florida Administrative Code (F.A.C.), Acquisition Adjustments]

Dear Mr. Teitzman:

Attached for filing, please find Ni Florida, Inc.'s Responses to Staff's SERC Data Requests of January 18, 2024.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

MEK

Cc: (PSC Staff – Guffey)
(Ni Florida – Sorensen)

ATTACHMENT

1. With reference to amended Subsection (3)(b)l. through 13., F.A.C., regarding the information to be included in the petition for a positive acquisition adjustment for non-viable utility, please explain and state the estimated cost to your utility to prepare the data and information listed for each requirement of Subsection (3)(b), F.A.C.

Company Response: It is estimated that the required information could be prepared using internal resources with no incremental costs other than for legal review and filing.

2. With reference to amended Subsection (4)(b)1. through 1 2., F.A.C., regarding the information to be included in the petition for a positive acquisition adjustment for viable utility, please explain and state the estimated cost to your utility to prepare the data and information listed for each requirement of Subsection (4)(b), F.A.C.

Company Response: It is estimated that the required information could be prepared using internal resources with no incremental costs other than for legal review and filing.

3. Referring to the proposed new Subsection (8), F.A.C., Notice, please provide the anticipated costs to your utility to prepare and provide the notice. Please note that lines 7 through 9 of Subsection (8), F.A.C., allow for the notice required by this rule to be combined with the notice of Application for Authority to Transfer issued pursuant to Rule 25-30.030, F.A.C. Therefore, any incremental costs could be impacted depending on whether your utility combines the notices required by Rules 25-30.030 and 25-30.0371, F.A.C, or does separate mailings. Please provide the incremental costs for both scenarios.

Company Response: For combined notices, it is estimated that the required information could be prepared using internal resources with no incremental costs other than for legal review and filing. For separate notice mailings, the cost would depend on the size of the notice and the number of recipients. If both are small, the utility could mail notice with little incremental cost. If larger, a 3rd party printing and mailing service would be required, with the costs commensurate with market rates.

A "small business " is defined by Section 288.703(6), F.S., as an independently owned and operated business concern that employs 200 or fewer permanent full-time employees and that, together with its affiliates, has a net worth of not more than \$5 million or any firm based in this state, which has a Small Business Administration 8(a) certification. As to sole proprietorships, the \$5 million net worth requirement shall include both personal and business investments.

4. Considering the above stated definition of a "small business," please state if your water and/or water and wastewater utility is a small business.

Company Response: Not a small business.

5. If yes, please state if the proposed rule would have an adverse, minimal, or no financial impact on your utility.

Company Response: Not applicable.

6. Would the proposed rule directly or indirectly result in incremental regulatory costs to your utility in excess of \$200,000 in the aggregate in Florida within 1 year after implementation of the rule?

Company Response: It is anticipated that it would not.

7. Would the proposed rule revisions have an adverse incremental impact on economic growth, private-sector job creation or employment, and private-sector investment in excess of \$1 million in the aggregate within 5 years after implementation of the rule?

Company Response: It is anticipated that it would not.

8. Would the proposed rule revisions have an adverse incremental impact on business competitiveness, productivity, and innovation in excess of \$1 million in the aggregate within 5 years after implementation of the rule?

Company Response: It is anticipated that it would not.

9. Would the proposed rule revisions result in incremental regulatory costs, including any transactional costs ("transactional costs" include filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used, procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring or reporting, and any other costs necessary to comply with the rule) to your utility, in excess of \$1 million in the aggregate within 5 years after the implementation of the rule? If yes, please explain.

Company Response: It is anticipated that it would not.

A "small city" is defined by Section 120.52(18), F.S., as any municipality that has an unincorporated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by Section 120.52(19), F.S., as any county that has an unincorporated population of 75,000 or less according to the most recent decennial census.

10. Considering the above definitions of a "small city" and "small county", please state if your utility serves a small city or several small cities, or a small county /counties? Would the small city/cities /county/counties served by your utility have financial impacts or no impacts due to the proposed rule revisions?

Company Response: The Company doesn't serve in a small city or county.

11. Please provide any additional information, including any tasks not identified above, which would result in incremental costs or savings to your utility, due to the proposed revisions to the rule, which the Commission may determine useful. [120.541 (2)(f), F.S.]

Company Response: The Company is aware of no other incremental costs or savings that will attach to the utility as a result of the adoption of the proposed rule.