

State of Florida

Commissioners:

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DIVISION OF LEGAL SERVICES
NOREEN S. DAVIS
DIRECTOR
(904) 413-6199

ORIGINAL
FILE COPY

Public Service Commission

Matthew Feil, Esquire
Staff Attorney
Southern States Utilities, Inc.
1000 Color Place
Apopka, Florida 32703

Re: Docket No. 950495 -- Application for rate increase and change in service availability charges for Orange-Osceola Utilities, Inc. in Osceola County, and in Bradford, Brevard, Charlotte, Citrus, Clay, Collier, Duval, Highlands, Lake, Lee, Marion, Martin, Nassau, Orange, Pasco, Putnam, Seminole, St. Johns, St. Lucie, Volusia, and Washington Counties by Southern States Utilities, Inc.

Dear Mr. Feil:

This letter is in response to your September 16, 1996, correspondence regarding SSU's public record request of Staff workpapers in this docket. Your September 16, 1996, letter requested that Staff provide all of the workpapers that SSU previously requested. In order to avoid unnecessary duplication and confusion, Staff has provided on this date any documentation which it may have erroneously failed to include in the first response to SSU's request.

Of particular concern to SSU was the revised revenue requirement accounting files. SSU only received documents on diskette which were dated prior to the first Special Agenda Conference. Staff fully intended to provide both the original and revised files, and with this letter, we have enclosed diskettes containing the revised files.

The September 16, 1996, letter also referenced histograms and rate calculations which were mentioned at the August 15, 1996, Special Agenda conference. Those documents are included with this letter. As we have discussed by telephone, Staff has made the diskette with service availability calculations available to the utility.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE

10170 SEP 24 86

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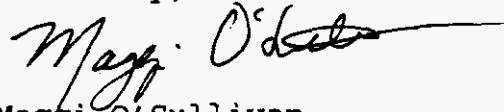
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FPSC-RECORDS/REPORTING

Mr. Matt Feil
September 20, 1996
Page Two

Please contact me at (904) 413-6199 if you have any questions regarding this letter or the attached materials.

Sincerely,

A handwritten signature in black ink, appearing to read "Maggi O'Sullivan", with a long horizontal flourish extending to the right.

Maggi O'Sullivan
Staff Counsel

cc: Division of Water and Wastewater (Hill, Willis)
Division of Legal Services (Davis)
Division of Records and Reporting

Enclosures



Southern States Utilities • 1000 Color Place • Apopka, FL 32703 • 407/880-0058

Florida Public Service Commission

RECEIVED

1996

September 16, 1996

LEGAL DIVISION

Ms. Maggi O'Sullivan
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0865

by fax & Federal Express

Re: Docket No. 950495-WS -- Application for rate increase and change in service availability charges for Orange-Osceola Utilities, Inc. in Osceola County, and in Bradford, Brevard, Charlotte, Citrus, Clay, Collier, Duval, Highlands, Lake Lee, Marion, Martin, Nassau, Orange, Pasco, Putnam, Seminole, St. Johns, St. Lucie, Volusia, and Washington Counties by Southern States Utilities, Inc.

Dear Maggi:

Pursuant to § 119.07, Florida Statutes, I write on behalf of Southern States Utilities, Inc. ("SSU") to again request copies of all staff workpapers supporting the staff recommendations in the above docket.

As you are aware, SSU initially requested the foregoing workpapers by letter dated July 18. Thereafter, I have written letters dated August 5 and August 27 concerning this request, and you and I have spoken regarding the request several times in the last two weeks. Thus far, all I can safely conclude is that SSU's efforts have yielded incomplete workpapers and mixed signals.

On August 13, Mr. Hill and Ms. Jaber wrote me that I had received all of staff's workpapers. Yet, staff acknowledges it is yet to send SSU a diskette containing service availability calculations.¹ In addition, at the August 15 Special Agenda, staff members stated that staff had made a number of calculation runs under various rate scenarios and had created histograms; SSU has not received workpapers evidencing such.

While I was in Tallahassee on September 3, Mr. Hill told me he was

¹ My August 27 letter erroneously states that the Commission altered only one of SSU's requested service availability charges. I mistakenly failed to except plant capacity charges from that statement. In any event, all workpapers supporting staff's recommended service availability should have been provided.



MAGGI O' SULLIVAN
PAGE 2

looking into whether staff had properly filled SSU's request, but Mr. Fuchs told me staff already sent SSU all of its workpapers. When I spoke with Trish Merchant, Bob Crouch and Tom Walden on September 11 in an effort to resolve matters, additional questions concerning SSU's request arose. Bob and Tom did not seem clear as to whether there was a schedule reflecting the revised used and useful percentages, but Trish pulled from a file folder (which contained a number of other documents) a copy of what appears to be before and after agenda used and useful percentages. Attached hereto are two of the pages Trish handed me. Trish then informed me that staff did not retain a copy of what it had provided SSU, thus making it impossible for staff to positively confirm it had sent SSU all staff workpapers. As you can see from the attached printout listing the accounting files staff provided SSU, none of the files are dated after July 24 -- the day the revenue requirement recommendation was filed. This corroborates the statement in my August 27 letter that SSU was certain it did not receive revised revenue requirement workpapers. The workpapers and disks SSU received on August 14, after the rates recommendation was filed, contained only rate design and AFPI information.

I appreciate the effort staff has made to respond to SSU's request; however, considering the above, I am frustrated in pursuit of a clear and complete response which meets both the letter and intent of the Public Records Act. Therefore, I ask that by no later than Friday, September 20, staff provide SSU all of the workpapers SSU has previously requested.

If you have any questions or comments, please call me at (407) 884-8777, ext. 260.

Sincerely yours,


Matthew Feil, Esq.
Staff Attorney

Revised 6-18-96

SSU - WATER SYSTEMS WITH GROUND STORAGE

6-17-96

Item Description	[ferm sto]	[ferm sto]	[ferm sto]	[ferm sto]	[ferm sto]	[ferm sto]	[ferm sto]
	AMELIA ISLAND	APPLE VALLEY	BEACON HILLS	BUENA-VENTURA	BURNT STORE	CHULUOTA	CITRUS SPGS
NON USED/USEFUL PERCENTAGES							
SUPPLY WELLS & PUMPING							
Accounts: 304.2, 305.2, 306.2, 307.2, 308.2, 309.2	0.00%	0.00%	0.00%	5.72%	47.28%	54.58%	0.00%
Account 311.2	n/a	n/a	0.00%	5.72%	n/a	n/a	n/a
NO. OF ERCS INCLUDED IN MARGIN RESERVE	0	0	290	340	182	21	0
NON USED/USEFUL WITHOUT MARGIN RESERVE	0.00%	0.00%	7.19%	9.81%	55.65%	55.66%	0.00%
SSU REQUESTED NON-USED AND USEFUL	0.00%	0.00%	0.00%	7.88%	0.00%	53.27%	0.00%
HIGH SERVICE PUMPING							
Account 311.2	0.00%	0.00%	n/a	n/a	0.00%	33.56%	15.73%
NO. OF ERCS INCLUDED IN MARGIN RESERVE	0	0			0	21	86
NON USED/USEFUL WITHOUT MARGIN RESERVE	0.00%	0.00%			0.00%	34.27%	17.09%
SSU REQUESTED NON-USED AND USEFUL	0.00%	0.00%			0.00%	7.05%	0.00%
WATER TREATMENT PLANT							
Accounts: 320.3, 321.3	n/a	n/a	n/a	n/a	30.27%	n/a	n/a
NO. OF ERCS INCLUDED IN MARGIN RESERVE					182		
NON USED/USEFUL WITHOUT MARGIN RESERVE					41.33%		
SSU REQUESTED NON-USED AND USEFUL					11.93%		
FINISHED WATER STORAGE							
Account: 330.4	0.00%	0.00%	0.00%	0.00%	15.34%	0.00%	0.00%
NO. OF ERCS INCLUDED IN MARGIN RESERVE	0	0	0	0	182	0	0
NON USED/USEFUL WITHOUT MARGIN RESERVE	0.00%	0.00%	0.00%	0.00%	21.79%	0.00%	0.00%
SSU REQUESTED NON-USED AND USEFUL	0.00%	0.00%	0.00%	0.00%	8.64%	0.00%	0.00%
HYDROPNEUMATIC TANKS (included under finished water storage)							
TRANSMISSION/DISTRIBUTION LINES							
Account: 331.4	31.58%	0.00%	0.00%	0.00%	86.30%	0.00%	83.34%
NO. OF ERCS INCLUDED IN MARGIN RESERVE	134	0	0	0	0	0	57
NON USED/USEFUL WITHOUT MARGIN RESERVE	33.10%	0.00%	0.00%	0.00%	86.30%	0.00%	83.76%
SSU REQUESTED NON-USED AND USEFUL	0.00%	0.00%	0.00%	0.00%	86.30%	0.00%	57.29%
ALL OTHER ACCOUNTS							
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

old

New Agenda

DOCKET NO. 960496-WB, ATTACHMENT B
 SSU - WATER SYSTEMS WITH GROUND STORAGE
 7-22-98 - Staff Recommended %'s are Highlighted

Item Description	(em stg)	(em stg)	(em stg)	(em stg)	(em stg)	(em stg)	(em stg)	(em stg)	(em stg)	
	AMELIA ISLAND	APPLE VALLEY	BEACON HILLS	BUENA-VENTURA	BURNT STORE	CHULUOTA	CITRUS SPGS **	DELTONA LAKES	DOL RAY MANOR	
NON USED/USEFUL PERCENTAGES										
SUPPLY WELLS & PUMPING										
Accounts: 304.2, 305.2, 306.2, 307.2, 308.2, 309.2	0.00%	0.00%	0.00%	5.72%	47.28%	54.58%	0.00%	15.25%	0.00%	
Account 311.2	n/a	n/a	0.00%	5.72%	n/a	n/a	n/a	n/a	n/a	
NO. OF ERCS INCLUDED IN MARGIN RESERVE	0	0	290	340	182	21	0	997	0	
NON USED/USEFUL WITHOUT MARGIN RESERVE	0.00%	0.00%	7.18%	9.81%	55.65%	55.66%	0.00%	18.34%	0.00%	
SSU REQUESTED NON-USED AND USEFUL	0.00%	0.00%	0.00%	0.00%	0.00%	53.27%	0.00%	11.43%	0.00%	
HIGH SERVICE PUMPING										
Account 311.2	0.00%	0.00%	n/a	n/a	0.00%	33.56%	15.73%	0.00%	63.00%	
NO. OF ERCS INCLUDED IN MARGIN RESERVE	0	0			0	21	86	0	0	
NON USED/USEFUL WITHOUT MARGIN RESERVE	0.00%	0.00%			0.00%	34.27%	17.09%	0.00%	63.00%	
SSU REQUESTED NON-USED AND USEFUL	0.00%	0.00%			0.00%	7.05%	0.00%	0.00%	63.00%	
WATER TREATMENT PLANT										
Accounts: 320.3, 321.3	n/a	n/a	n/a	n/a	30.27%	n/a	n/a	n/a	n/a	
NO. OF ERCS INCLUDED IN MARGIN RESERVE					182					
NON USED/USEFUL WITHOUT MARGIN RESERVE					41.33%					
SSU REQUESTED NON-USED AND USEFUL					11.83%					
FINISHED WATER STORAGE										
Account: 330.4	0.00%	0.00%	0.00%	0.00%	15.34%	0.00%	0.00%	0.00%	0.00%	
NO. OF ERCS INCLUDED IN MARGIN RESERVE	0	0	0	0	182	0	0	0	0	
NON USED/USEFUL WITHOUT MARGIN RESERVE	0.00%	0.00%	0.00%	0.00%	21.79%	0.00%	0.00%	0.00%	0.00%	
SSU REQUESTED NON-USED AND USEFUL	0.00%	0.00%	0.00%	0.00%	8.64%	0.00%	0.00%	0.00%	0.00%	
HYDROPNEUMATIC TANKS (included under finished water storage)										
TRANSMISSION/DISTRIBUTION LINES										
Account: 331.4	31.58%	37.06%	0.00%	0.00%	88.01%	34.12%	83.34%	29.77%	23.38%	
NO. OF ERCS INCLUDED IN MARGIN RESERVE	134	21	0	0	122	14	57	664	0	
NON USED/USEFUL WITHOUT MARGIN RESERVE	35.10%	38.28%	0.00%	0.00%	88.75%	35.36%	83.78%	31.51%	23.38%	
SSU REQUESTED NON-USED AND USEFUL	0.00%	0.00%	0.00%	0.00%	86.30%	0.00%	57.29%	10.70%	0.00%	
ALL OTHER ACCOUNTS	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	

05

31

468,779,008 bytes free

116 file(s) 15,421,130 bytes

Directory of I:\RATES\FPSC\WORKPAPE

Volume in drive I is SYS4

Volume Serial Number is 0670-7CF3

104W	WK4	142,760	07-23-96	12:24p
1054W	WK4	142,652	07-23-96	12:24p
105W	WK4	142,648	07-23-96	11:19a
106W	WK4	144,564	07-23-96	1:21p
1094W	WK4	143,400	07-23-96	1:45p
1095W	WK4	142,736	07-23-96	4:44p
1106W	WK4	143,956	07-23-96	1:45p
1113W	WK4	142,800	07-23-96	11:53a
1115W	WK4	142,756	07-24-96	9:46a
1117W	WK4	142,948	07-24-96	9:46a
1118W	WK4	142,432	07-23-96	11:46a
121W	WK4	142,696	07-23-96	10:11a
122W	WK4	142,644	07-23-96	11:25a
1279W	WK4	143,112	07-23-96	1:45p
1298W	WK4	142,624	07-23-96	11:55a
1427W	WK4	143,128	07-23-96	11:34a
1429W	WK4	143,356	07-23-96	1:28p
1518W	WK4	143,956	07-23-96	10:43a
1701W	WK4	142,792	07-23-96	1:44p
1702W	WK4	142,648	07-23-96	2:27p
1801W	WK4	143,472	07-23-96	11:15a
1802W	WK4	143,036	07-23-96	1:45p
1806W	WK4	145,400	07-23-96	11:48a
2101W	WK4	142,984	07-23-96	11:23a
2201W	WK4	143,668	07-23-96	11:20a
2202W	WK4	143,880	07-23-96	11:12a
2301W	WK4	142,616	07-23-96	4:57p
2302W	WK4	142,644	07-23-96	11:30a
2401W	WK4	143,300	07-10-96	1:54p
2601W	WK4	145,032	07-23-96	1:50p
2602W	WK4	143,928	07-23-96	1:48p
2801W	WK4	143,436	07-23-96	3:16p
2901W	WK4	145,556	07-23-96	12:24p
3000W	WK4	144,316	07-23-96	11:41a
323W	WK4	142,960	07-23-96	12:24p
324W	WK4	142,648	07-23-96	10:20a
325W	WK4	142,832	07-23-96	12:24p
326W	WK4	142,240	07-23-96	11:06a
330W	WK4	143,336	07-23-96	1:42p
332W	WK4	142,976	07-23-96	11:08a
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335W	WK4	143,448	07-23-96	11:15a
336W	WK4	142,556	07-23-96	10:47a
340W	WK4	142,468	07-23-96	1:20p
438W	WK4	142,396	07-23-96	1:19p
440W	WK4	143,268	07-23-96	1:32p
442W	WK4	142,612	07-23-96	11:26a
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555W	WK4	142,716	07-23-96	11:13a
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559W	WK4	143,060	07-23-96	1:24p
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573W	WK4	142,928	07-23-96	11:05a
574W	WK4	143,244	07-23-96	11:46a
575W	WK4	142,256	07-23-96	11:10a
578W	WK4	142,536	07-23-96	11:30a
579W	WK4	143,088	07-23-96	1:39p
573W	WK4	142,876	07-23-96	11:49a
575W	WK4	143,148	07-23-96	1:54p
579W	WK4	142,728	07-23-96	1:33p
772W	WK4	142,664	07-23-96	11:50a
773W	WK4	143,116	07-23-96	1:45p
780W	WK4	143,204	07-23-96	1:14p
781W	WK4	142,860	07-23-96	11:24a
782W	WK4	142,672	07-23-96	4:44p
783W	WK4	142,680	07-23-96	11:26a
784W	WK4	142,652	07-23-96	11:09a
886W	WK4	143,852	07-23-96	11:10a
888W	WK4	143,368	07-23-96	11:26a
906W	WK4	143,716	07-23-96	11:17a
907W	WK4	142,908	07-23-96	4:53p
950495A	RCM	990,359	07-24-96	10:59a
984W	WK4	142,672	07-23-96	11:18a
986W	WK4	142,596	07-23-96	11:55a
987W	WK4	143,168	07-23-96	11:19a
988W	WK4	142,612	07-23-96	11:26a
989W	WK4	143,944	07-23-96	12:04p
990W	WK4	142,900	07-23-96	10:30a
992W	WK4	142,404	07-23-96	2:51p
993W	WK4	143,016	07-23-96	2:26p
994W	WK4	143,120	07-23-96	11:48a
995W	WK4	142,676	07-23-96	12:24p
ALLOC	WK4	297,832	07-08-96	10:52a
ATTMTSSU	WOA	18,271	07-29-96	1:42p
ATTMTSSU	WK4	17,768	07-16-96	9:43a
AVG1994	WK4	49,524	07-25-96	8:45a
AVG94WW	WOA	40,808	07-29-96	1:44p
AVG94WW	WK4	30,440	07-25-96	8:46a
B-INDEX	WK4	20,140	06-27-96	11:13a
COC96	WK4	13,360	07-23-96	11:57a
CONSER	WK4	7,400	07-24-96	2:08p
EXPADJ	WK4	5,372	07-24-96	2:37p
FINADJ	WK4	5,792	07-24-96	2:21p
I100ADJ	WK4	3,076	07-24-96	2:35p
KEYHAPT	WK4	4,192	07-24-96	2:37p
PLANTADD	WK4	46,380	07-24-96	2:37p
RATECAS	WOA	48,721	07-29-96	10:59a
RATECAS	WK4	30,308	07-24-96	2:07p
REVENUE	WK4	45,016	07-23-96	5:22p
SUMMARY	WK4	140,816	07-23-96	4:35p
TEST	WK4	141,872	06-27-96	2:54p
TOTCONXP	WK4	22,552	07-16-96	5:54p
UUNWWTR	WK3	63,191	07-17-96	2:36p
UUSTG	WK4	274,640	07-17-96	1:24p

JUPOSTG	WK3	177,684	07-17-96	2:10p
WORKCAP	WK4	13,672	07-24-96	2:38p
REPRADJ	WK4	38,444	07-24-96	2:25p