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MARTIN S. FRIEDMAN, P.A. VALERIE L. LORD, OF COUNSEL (LICENSED IN TEXAS ONLY)

June 16, 2003

HAND DELIVERY

Chairman Lila Jaber Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Labrador Utilities, Inc. 2003 General Rate Increase Application Docket No. 030443-WS <u>Our File No. 30057.64</u>

Dear Chairman Jaber:

AUS

CAF CMP

COM CTR

ECR GCL OPC

MMS SEC

OTH

Supplementing our letter of May 14, 2003, requesting approval of a test year for Labrador Utilities, Inc. ("Utility"), we provide the following information:

(a) The Utility requests a historical test year ending June 30, 2003, for interim rate purposes, and December 31, 2003 for final rate purposes. The MFRs for interim rates will be filed on or before October 30, 2003, and for final rates on or before June 30, 2004.

(b) The requested test years are representative of a normal full year of operation. During the test years, there were no catastrophic events or occurrences that affected operations, no material alterations in plant or system capacity, no extraordinary increases in demand or consumption, or significant changes in weather patterns that would alter or affect current methods of operation.

(c) Since the Utility was acquired in 2002, the Utility has made major changes to plant and equipment, specifically, plant and equipment upgrades and modifications, safety and security improvements, and rehabilitative work to plant grounds and percolation ponds. Within that same period of time, there have been no major changes in operational methods.

(d) The pro formas are non growth-related.

0000MENT NEMITY DATE

CHRIS H. BENTLEY, P.A. ROBERT C. BRANNAN DAVID F. CHESTER F. MARSHALL DETERDING JOHN R. JENKINS, P.A. STEVEN T. MINDLIN, P.A. DAREN L. SHIPPY WILLIAM E. SUNDSTROM, P.A. DIANE D. TREMOR, P.A. JOHN L. WHARTON ROBERT M. C. ROSE, OF COUNSEL WAYNE L. SCHIEFELBEIN, OF COUNSEL Chairman Lila Jaber Florida Public Service Commission June 16, 2003 Page 2

(e) Pursuant to Section 367.081(8), Florida Statutes, the Utility requests that the Commission process this petition for rate relief using the proposed agency action procedure. The Utility also will request interim rates based on the projected test year.

Should you have any questions regarding this supplemental test year request, please do not hesitate to contact me.

Very truly yours,

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 MARTIN S. FRIEDMAN For the Firm

MSF/dmp

cc: Ms. Blanca Bayo, Commission Clerk and Administrative Services Director (by hand delivery)
Ms. Patricia Merchant, Division of Economic Regulation (by hand delivery)
Mr. Steven M. Lubertozzi
Mr. Donald W. Rassmussen
Mr. Patrick Flynn
Mr. David L. Orr
Mr. Frank Seidman