

ORIGINAL

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(407) 830-6331
FAX (407) 830-8522

REPLY TO ALTAMONTE SPRINGS

MARTIN S. FRIEDMAN, P.A.
VALERIE L. LORD

October 4, 2004

HAND DELIVERY

RECEIVED-PPSC
04 OCT -4 AM 10:49
COMMISSION
CLERK

Ms. Blanca Bayo
Commission Clerk and Administrative Services Director
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No.: 030443-WS; Application of Labrador Utilities, Inc., for Rate Increase
in Pasco County, Florida
Our File No.: 30057.64

Dear Ms. Bayo:

Labrador Utilities, Inc., provides the following **supplemental** response to Staff's data requests dated July 27, 2004:

DATA REQUEST NO. 1:

For each individual person, in each firm providing consulting services to the applicant pertaining to this docket, provide the billing rate, and an itemized description of work performed. Please provide detail of hours worked, associated with each activity. Also, provide a description and associated cost for all expenses incurred to date.

CMP _____

COM _____

CTR RESPONSE: Please refer to the attachments.

ECR _____

DATA REQUEST NO. 2:

For each firm or consultant providing services for the applicant in this docket, please provide copies of all invoices for services provided to date.

MMS _____

RCA RESPONSE: Please refer to the attachments which update legal rate case expense through the end of September 2004.

SCR _____

SEC 1

OTH _____

DOCUMENT NUMBER-DATE
10634 OCT-4 04
FPSC-COMMISSION CLERK

Ms. Blanca Bayo
October 4, 2004
Page 2

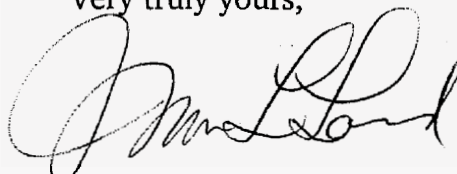
DATA REQUEST NO. 5:

Please provide an estimate of costs to complete the rate case by hour for each consultant or employee, including a description of estimated work to be performed, and detail of the estimated remaining expense to be incurred through the PAA process.

RESPONSE: Please refer to the responses to Data Requests Nos. 1 and 2.

Should you have any questions regarding these responses, please do not hesitate to give me a call.

Very truly yours,



VALERIE L. LORD
For the Firm

VLL/tlc
Enclosures

cc: Ms. Tricia Merchant (w/enclosures) (via hand delivery)
Ms. Denise Greene (w/enclosures) (via hand delivery)
Mr. Steven M. Lubertozzi (w/enclosures)
Mr. Patrick C. Flynn (w/enclosures)

M:\1 ALTAMONTE\UTILITIES INC\LABRADOR UTILITIES\(.64) LABRADOR 2003 RATE CASE\PSC Clerk 14 (Response to Data Requests -2- supp).ltr.wpd

LABRADOR UTILITIES, INC.
 SCHEDULE OF ACTUAL AND ESTIMATED RATE CASE LEGAL EXPENSE
 ASSUMING RESOLUTION AT PAA
 DOCKET NO.: 030443-WS

ROSE, SUNDBLUM & BENTLEY, LLP
ACTUAL BILLINGS

<u>Month of Service</u>	<u>Invoice Date</u>	<u>Time Charges</u>	<u>Expenses</u>	<u>Total</u>
April 2003	05/19/03	\$ 202.50	\$ 0.00	\$ 202.50
May 2003	06/13/03	\$ 382.50	\$ 14.97	\$ 397.47
June 2003	07/16/03	\$ 630.00	\$ 16.84	\$ 646.84
July 2003	08/15/03	\$ 112.50	\$ 10.50	\$ 123.00
August 2003	09/17/03	\$ 45.00	\$ 5.00	\$ 50.00
September 2003	10/15/03	\$ 22.50	\$ 0.00	\$ 22.50
October 2003	11/17/03	\$ 1,710.00	\$ 4,211.25 ¹	\$ 5,921.25
November 2003	12/17/03	\$ 585.00	\$ 39.05	\$ 624.05
December 2003	01/21/04	\$ 855.00	\$ 33.29	\$ 888.29
January 2004	02/16/04	\$ 504.00	\$ 360.96	\$ 864.96
February 2004	03/17/04	\$ 4,248.00	\$ 66.49	\$ 4,314.49
March 2004	04/15/04	\$ 2,160.00	\$ 39.00	\$ 2,199.00
June 2004	07/16/04	\$ 2,712.00	\$ 589.48	\$ 3,301.48
July 2004	08/18/04	\$ 5,784.00	\$ 470.50	\$ 6,254.50
August 2004	09/20/04	\$10,776.00	\$ 229.42	\$11,005.42
TOTAL ACTUAL BILLINGS THROUGH 09/30/04		\$30,729.00	\$ 6,086.75	\$36,815.75

ESTIMATE TO COMPLETE THROUGH PAA

Review Staff data requests, prepare responses to same;
 prepare rate case expense schedule, telephone conferences
 with Mr. Lubertozzi and Mr. Seidman re same; review
 staff recommendation; conferences with client and
 Mr. Seidman concerning same; travel to Tallahassee
 and attend PSC Agenda Conference; review PAA
 Order; draft customer notices, revised Tariffs and
 miscellaneous post PAA matters - 50.0 hours

Total Estimate to Complete	\$12,000.00	\$1000.00 ²	\$13,000.00
TOTAL ACTUAL & ESTIMATED LEGAL EXPENSE	\$42,729.00	\$7,086.75	\$49,815.75

¹Includes \$4,000 filing fee

² Includes travel, food and accommodation (mileage @ \$0.375 per mile Altamonte Springs to Tallahassee), to attend agenda conference, postage, photocopying, telephone, facsimile and other expenses.

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TALLAHASSEE, FLORIDA 32302-1567

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WHEN REMITTING

FE.I. # 59-2783536

UTILITIES, INC
C/O MS. SUE AYLIN
2335 SANDERS RD
NORTHBROOK, IL 50062

INVOICE # 29038
JULY 16, 2004
FILE # 30057-0064

PAGE 1

MATTER	LABRADOR UTILITIES, INC - 2003 RATE CASE	
06/07/04	TELEPHONE CONFERENCE WITH MF. FLYNN WHO TELEPHONED REGARDING BILLING.	0.20
06/10/04	TELEPHONE CONFERENCE WITH MR. LUBERTOZZI WHO TELEPHONED REGARDING MFR'S.	0.30
06/17/04	REVIEW CORRESPONDENCE FROM MS. GREENE AND MS. MERCHANT RE: LABRADOR SERVICE AVAILABILITY CHARGES; REVIEW PRIOR PSC ORDER; SEVERAL TELEPHONE CONFERENCES WITH MR. LUBERTOZZI RE: SAME; TELEPHONE CONFERENCE WITH MS. MERCHANT; TELEPHONE CONFERENCE WITH MR. FLYNN.	1.50
06/17/04	TELEPHONE CONFERENCE WITH MS. MERCHANT AND MS. GREENE REGARDING SERVICE AVAILABILITY CHARGES AND BILLING ISSUES;	0.00
06/22/04	TELEPHONE CONFERENCE WITH MR. LUBERTOZZI CONCERNING SAME.	0.50
06/22/04	TELEPHONE CONFERENCE WITH CLIENT, PSC STAFF RE: CUSTOMER NOTICES; REVIEW FILE RE: TIMING OF NOTICES.	0.30
06/24/04	SEVERAL TELEPHONE CONFERENCES WITH MR. LUBERTOZZI IN PREPARATION FOR FINALIZING MFR'S; DRAFT SERVICE AVAILABILITY LANGUAGE; LETTER TO MR. LUBERTOZZI REGARDING SAME; REVIEW STAFF RECOMMENDATION ON R.V. PARK'S MOTION AND LETTER TO MR. LUBERTOZZI REGARDING SAME.	2.80
06/24/04	REVIEW DRAFT OF MFR'S AND TELEPHONE CONFERENCE WITH MR. LUBERTOZZI REGARDING SAME; TELEPHONE CONFERENCE WITH MR. FLYNN.	0.00
06/25/04	TELEPHONE CONFERENCE WITH MR. LUBERTOZZI RE: LEVERAGE FORMULA; PREPARE APPLICATION, TARIFF SHEETS.	0.60
06/25/04	TELEPHONE CONFERENCE WITH S. LUBERTOZZI RE: LEVERAGE FORMULA; PREPARE APPLICATION, TARIFF SHEETS.	0.50
06/28/04	TELEPHONE CONFERENCE WITH PSC STAFF RE: NOTICES AND HEARINGS; COMMUNICATIONS	0.30

SF 1416.00
11/19/04
OCT 01 2004 11:32

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UTILITIES, INC

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JULY 16, 2004
FILE # 30057-0064

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	WITH PSC STAFF RE: FOUR-MILE LIST; TELEPHONE CONFERENCE WITH R. REDEMANN RE: SAME; TELEPHONE CONFERENCE WITH S. LUBERTOZZI RE: SAME.		
06/29/04	PREPARE MFR'S AND ADDITIONAL ENGINEERING INFORMATION FOR FILING; TELEPHONE CONFERENCE WITH S. LUBERTOZZI, P. FLYNN RE: SAME.	4.00	
06/30/04	TELEPHONE CONFERENCE WITH S. LUBERTOZZI RE: MFR SCHEDULES.	0.30	
		11.30	2,712.00
	LONG DISTANCE CALLS	3.00	
	TRAVEL EXPENSE	191.12	
	TELECOPIER	5.00	
	FILING FEE	2,000.00	
	PHOTOCOPIES	287.61	
	PHOTOCOPIES	102.75	
	TOTAL COSTS ADVANCED		2,589.48
	TOTAL STATEMENT		\$5,301.48

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F.E.I. # 58-2783538

UTILITIES, INC
C/O MS. SUE AYLIN
2335 SANDERS RD
NORTHBROOK, IL 60062

INVOICE # 29197
AUGUST 18, 2004
FILE # 30057-0064

PAGE 1

MATTER LABRADOR UTILITIES, INC - 2003 RATE CASE

07/01/04	TELEPHONE CONFERENCE WITH MS. MERCHANT OF PSC WHO TELEPHONED; TELEPHONE CONFERENCE WITH MR. LUBERTOZZI.	0.40
07/02/04	PREPARE REVISED CASE SCHEDULE; COMMUNICATIONS WITH CLIENT RE: SAME; TELEPHONE CONFERENCE WITH PSC STAFF RE: DATA REQUESTS, CASE SCHEDULE; TELEPHONE CONFERENCE WITH P. FLYNN, S. LUBERTOZZI RE: SAME; COMMUNICATIONS AND TELEPHONE CONFERENCE WITH CLIENT RE: REVENUE REPORTS.	0.80
07/02/04	COMMUNICATIONS WITH CLIENT RE: RESPONSES TO REQUESTS.	0.60
07/02/04	TRAVEL TO TALLAHASSEE FOR AGENDA ON HOA'S MOTION.	2.10
07/06/04	PREPARE FOR AND ATTEND PSC AGENDA ON HOA'S MOTIONS; TELEPHONE CONFERENCE WITH MR. LUBERTOZZI REGARDING SAME; RETURN TO ALTAMONTE SPRINGS.	7.50
07/07/04	COMMUNICATIONS WITH CLIENT RE: NOTICES TO CUSTOMERS; TELEPHONE CONFERENCE WITH PSC STAFF RE: CUSTOMER SERVICE HEARING.	0.50
07/08/04	COMMUNICATIONS WITH PSC STAFF RE: OFFICIAL FILING DATE, DEFICIENCIES, DISCOVERY.	0.20
07/09/04	PREPARE SYNOPSIS AND COMBINED CUSTOMER NOTICE.	2.00
07/12/04	LETTER TO B. BAYO RE: INTERIM REVENUE REPORT; COMMUNICATIONS WITH CLIENT RE: SAME; PREPARE SYNOPSIS AND COMBINED CUSTOMER NOTICE.	1.20
07/16/04	PREPARE SYNOPSIS AND COMBINED NOTICE; TELEPHONE CONFERENCE WITH C. KEATING OF PSC RE: DATA REQUESTS AND DEFICIENCY LETTER; COMMUNICATIONS WITH CLIENT AND	1.20

15F 26216.00
LL 3168.00

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F.E.I. # 89-2783536

UTILITIES, INC

INVOICE # 29197
AUGUST 18, 2004
FILE # 30057-0064

PAGE 2

DATE	DESCRIPTION	AMOUNT
07/19/04	F. SEIDMAN AND PSC STAFF RE: SAME; LETTER TO CLIENT RE: REVISED CASR. PREPARE RATE CASE EXPENSE SCHEDULE; TELEPHONE CONFERENCE WITH T. MERCHANT, C. KEATING RE: SAME; COMMUNICATIONS RE: PAYMENT OF FILING FEE.	1.60
07/20/04	TELEPHONE CONFERENCE WITH G. EDWARDS OF PSC RE: FILING FEE.	0.20
07/21/04	COMMUNICATIONS AND TELEPHONE CONFERENCE WITH D. GREENE OF PSC RE: COMBINED NOTICE AND SYNOPSIS; TELEPHONE CONFERENCE WITH S. LUBERTOZZI RE: COMBINED NOTICE AND CONSUMPTION DATA;	1.00
07/21/04	PREPARE COMBINED NOTICE AND SYNOPSIS; LETTER TO B. BAYO RE: REFUND OF FILING FEE.	0.00
07/22/04	TELEPHONE CONFERENCE WITH D. GREENE RE: CUSTOMER NOTICE; COMMUNICATIONS WITH D. GREENE RE: SAME.	0.30
07/26/04	TELEPHONE CONFERENCE WITH MR. LUBERTOZZI WHO TELEPHONED REGARDING DATA REQUEST.	0.30
07/26/04	TELEPHONE CONFERENCE WITH C. KEATING OF PSC. CLIENT RE: CUSTOMER NOTICES; PREPARE NOTICE OF HEARING;	0.50
07/27/04	COMMUNICATIONS WITH PSC STAFF RE: SAME. REVIEW STAFF'S SECOND DATA REQUESTS; COMMUNICATIONS WITH CLIENT RE: SAME;	0.50
07/29/04	PREPARE CUSTOMER NOTICE. REVIEW PROPOSED RESPONSES TO PSC STAFF DEFICIENCY LETTER AND RAI AND TELEPHONE CONFERENCE WITH MR. LUBERTOZZI REGARDING SAME.	0.40
07/29/04	PREPARE RESPONSES TO STAFF'S FIRST DATA REQUESTS; TELEPHONE CONFERENCE WITH S. LUBERTOZZI RE: SAME.	3.00
07/30/04	TELEPHONE CONFERENCE WITH MR. LUBERTOZZI WHO TELEPHONED REGARDING REVISIONS TO MFR'S.	0.20
		24.10

5,784.00
P.05

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UTILITIES, INC

INVOICE # 29197
AUGUST 18, 2004
FILE # 30057-0064

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LONG DISTANCE CALLS	4.50	
FEDERAL EXPRESS	39.34	
TELECOPIER	4.50	
PHOTOCOPIES AND BINDING	131.91	
PHOTOCOPIES	290.25	
TOTAL COSTS ADVANCED		470.50
TOTAL STATEMENT		\$5,254.50

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FEJ. # 59-2783538

UTILITIES, INC
C/O MS. SUE AYLIN
2335 SANDERS RD
NORTHBROOK, IL 60062

INVOICE # 29299
SEPTEMBER 20, 2004
FILE # 30057-0064

PAGE 1

MATTER	LABRADOR UTILITIES, INC - 2003 RATE CASE	
08/02/04	REVIEW COMMENTS FROM MR. FLYNN AND MR. LUBERTOZZI IN RESPONSE TO LETTER FROM MS. GREENE.	0.20
08/02/04	TELEPHONE CONFERENCE WITH T. MERCHANT RE: CUSTOMER NOTICES; TELEPHONE CONFERENCE WITH S. LUBERTOZZI RE: SAME; PREPARE RESPONSES TO DEFICIENCY LETTER; TELEPHONE CONFERENCE WITH S. LUBERTOZZI AND P. FLYNN RE: SAME.	3.00
08/03/04	PREPARE RESPONSE TO DEFICIENCY LETTER; REVIEW CONSUMPTION NOTICE; COMMUNICATIONS WITH CLIENT RE: DATA REQUESTS; CONFERENCE WITH CLIENT RE: DATA REQUESTS.	3.50
08/04/04	PREPARE COMBINED NOTICE OF CUSTOMER MEETING AND TARIFF SHEETS REFLECTING NEW CLASSES OF SERVICE; COMMUNICATIONS WITH PSC RE: SAME.	3.00
08/05/04	TELEPHONE CONFERENCE WITH D. GREENE AND S. LUBERTOZZI RE: COMBINED NOTICE TO CUSTOMERS; PREPARE SAME; COMMUNICATIONS WITH PSC AND CLIENT RE: SAME; COMMUNICATIONS WITH CLIENT RE: DATA REQUESTS AND RATE STRUCTURE; PREPARE	2.50
08/05/04	TARIFF SHEETS.	0.00
08/06/04	TELEPHONE CONFERENCE WITH S. LUBERTOZZI RE: TARIFFS, NOTICE TO CUSTOMERS.	0.20
08/09/04	REVIEW STAFF RECOMMENDATION SUSPENDING RATES AND LETTER TO MR. LUBERTOZZI REGARDING SAME; TELEPHONE CONFERENCE WITH MR. LUBERTOZZI WHO TELEPHONED.	0.60
08/09/04	PREPARE TARIFF SHEETS; COMMUNICATIONS WITH PSC STAFF RE: SAME.	1.00
08/10/04	COMMUNICATIONS WITH S. LUBERTOZZI RE: STAFF'S SECOND SET OF DATA REQUESTS;	2.00

Continued

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F.E.I. # 59-2783536

UTILITIES, INC

INVOICE # 29299
SEPTEMBER 20, 2004
FILE # 30057-0064

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DATE	DESCRIPTION	AMOUNT
08/10/04	PREPARE RESPONSES TO DATA REQUESTS, SYNOPSIS; TELEPHONE CONFERENCE WITH S. LUBERTOZZI RE: SAME; TELEPHONE CONFERENCE WITH T. MERCHANT RE: CUSTOMER MEETING; COMMUNICATOINS WITH PSC STAFF RE: SYNOPSIS; PREPARE SUPPLEMENTAL RESPONSE TO STAFF'S DEFICIENCY LETTER.	0.00
08/11/04	PREPARE RESPONSES TO STAFF'S SECOND SET OF DATA REQUESTS, SUPPLEMENT TO STAFF'S FIRST SET OF DATA REQUESTS; TELEPHONE CONFERENCE WITH S. LUBERTOZZI, P. FLYNN RE: SAME; COMMUNICATIONS WITH S. DIHEL, S. LUBERTOZZI, P. FLYNN RE: SAME.	4.50
08/16/04	TRAVEL TO TALLAHASSEE FOR AGENDA CONFERENCE.	4.00
08/17/04	ATTEND PSC AGENDA CONFERENCE AND TELEPHONE CONFERENCE WITH MR. LUBERTOZZI REGARDING SAME; RETURN TO ALTAMONTE SPRINGS.	5.00
08/17/04	TELEPHONE CONFERENCE WITH T. MERCHANT RE: SYNOPSIS; ORIGINAL APPRAISAL VALUE OF LAND; PREPARE SYNOPSIS.	2.50
08/18/04	PREPARE REVISED SYNOPSIS; COMMUNICATIONS WITH PSC STAFF RE: SAME; LETTER TO B. BAYO RE: INTERIM REVENUE REPORT.	2.50
08/19/04	COMMUNICATIONS WITH PSC STAFF RE: SYNOPSIS; PREPARE SYNOPSIS.	1.00
08/20/04	REVIEW DATA REQUEST FROM PSC ATTORNEY AND LETTER TO MR. LUBERTOZZI REGARDING SAME; TELEPHONE CONFERENCE WITH MR. LUBERTOZZI.	0.50
08/20/04	PREPARE NOTICE OF FILING (AFFIDAVIT OF MAILING); LETTER TO B. BAYO RE: SAME; COMMUNICATIONS WITH D. GREENE (PSC) RE: SYNOPSIS.	0.40
08/23/04	TELEPHONE CONFERENCE WITH MS. MERCHANT WHO TELEPHONED; TELEPHONE CONFERENCE WITH MR. FLYNN REGARDING SAME.	0.50
08/24/04	TRAVEL TO ZEPHERHILLS AND CONFERENCE WITH MR. FLYNN; ATTEND CUSTOMER MEETING;	7.20

Continued

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UTILITIES, INC

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08/25/04	RETURN TO ALTAMONTE SPRINGS. TELEPHONE CONFERENCE WITH MR. FLYNN AND MR. LUBERTOZZI WHO TELEPHONED REGARDING METER ISSUES.	0.40
08/26/04	TELEPHONE CONFERENCE WITH MS. MERCHANT REGARDING METER READINGS, ETC.	0.30
08/30/04	TELEPHONE CONFERENCE WITH S. LUBERTOZZI RE: APPRAISAL ON PLANT.	0.10
		44.90
		10,776.00
	LONG DISTANCE CALLS	6.75
	FEDERAL EXPRESS	49.02
	TRAVEL EXPENSE	95.81
	TELECOPIER	35.00
	PHOTOCOPIES	32.84
	LEXIS SERVICE	10.00
	TOTAL COSTS ADVANCED	229.42
	TOTAL STATEMENT	\$11,005.42

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