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REPLY TO ALTAMONTE SPRINGS

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

October 13, 2004

**HAND DELIVERY**

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 responses to Staff's data requests dated July 27, 2004:

**DATA REQUEST NO. 4:**

For each Utilities, Inc. or Water Services Corp., employee that incurs costs that will be recorded as rate case expense for this docket, please provide a copy of all time sheets supporting those costs with a breakdown by job function performed and including the hourly rate charged.

CMP \_\_\_\_\_

COM \_\_\_\_\_

CTR \_\_\_\_\_ **RESPONSE:** Please refer to the attachment.

ECR \_\_\_\_\_ **DATA REQUEST NO. 5:**

GCL \_\_\_\_\_ 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.

MMS \_\_\_\_\_

RCA \_\_\_\_\_ **RESPONSE:** Please refer to the response to Data Request No. 4.

SCR \_\_\_\_\_

SEC   /  

OTH \_\_\_\_\_

DOCUMENT NUMBER - DATE

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FPSC - COMMISSION CLERK

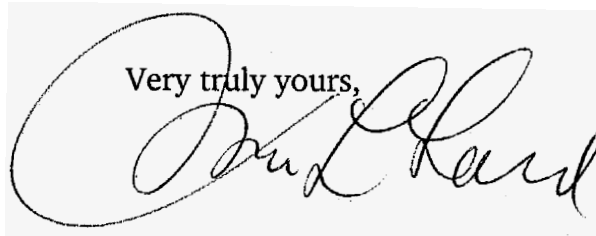
Ms. Blanca Bayo  
October 13, 2004  
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**DATA REQUEST NO. 6:**

Please provide an itemized list of all other costs estimated to be incurred through the PAA process.

**RESPONSE:** Please refer to the responses to Data Requests Nos. 4 and 5.

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)  
Mr. Jay Revell (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 024 (Response to Data Requests -2 -supp -2).ltr.wpd

**Labrador Utilities, Inc.**  
**Rate Case Expense**

ACTUAL EMPLOYEE TIME (THROUGH JULY 2004)

<u>Employee</u>	<u>2003 Hours Worked</u>	<u>2004 Hours Worked</u>		<u>2003 Hourly Rate</u>	<u>2004 Hourly Rate</u>	<u>Total</u>	<u>Job Function</u>
		<u>6/30/2004</u>	<u>12/31/2004</u>				
Dihel, Steve	14	9	30	\$ 29	\$ 29	\$ 1,537	supportive role, involved in regulatory process, rate case filing, administrative duties
Weeks, Kirsten	4	17	56	\$ 31	\$ 36	\$ 2,667	supportive role, involved in regulatory process, rate case filing, administrative duties
Lubertozzi, Steve	33	49	64	\$ 70	\$ 71	\$ 10,284	management role, involved in regulatory process, rate case filing, administrative duties, assisted in preparation of MFRs
		24		\$ 70		\$ 1,680	correcting MFR deficiencies
Flynn, Patrick			43	\$ 58	\$ 58	\$ 2,483	preparation of MFR information, preparation of system maps, on-site meetings with PSC staff, attendance at the customer meeting, responses to staff requests, analyzing issues involved in responses
						<u>\$ 18,651</u>	

Labrador Utilities, Inc.  
Rate Case Expense

ESTIMATED EMPLOYEE TIME (FOR AUGUST 2004 THROUGH END OF RATE CASE)

Employee	Estimated Hours to Complete	Hourly Rate	Total	Job Function
Dihel, Steve	55	\$ 29	\$ 1,595	supportive role, answering data requests, discovery responses, administrative duties
Weeks, Kirsten	55	\$ 36	\$ 1,980	supportive role, answering data requests, discovery responses, administrative duties
Lubertozzi, Steve	85	\$ 71	\$ 6,035	management role, involved in regulatory process, data requests, discovery responses, administrative duties
Flynn, Patrick	55	\$ 58	\$ 3,176	telephone conversations with PSC staff, meetings and telephone conversations with corporate staff, consultants, and legal counsel, responses to data requests
			<u>\$ 12,786</u>	

ESTIMATED COSTS TO COMPLETE RATE CASE

Type of Expense	Costs to Date	Estimated Costs to Complete	Total Rate Case Expense
WSC employees (through 3/03)	18,651.25	12,786.25	31,437.50
WSC miscellaneous (through 4/03):			
Travel	-	1,075.00	1,075.00
Printing/Copying	337.66	163.14	500.80
Postage	777.27	533.74	1,311.01
Envelopes	51.69	51.69	103.39
	<u>19,817.87</u>	<u>14,609.82</u>	<u>34,427.70</u>

\* Estimated Costs to Complete include airfare of \$55 lodging of \$320 (2 nights @ \$160), and a per diem of \$35/day (\$35 \* 3=105), and miscellaneous of \$10 for parking, etc.

**Labrador Utilities, Inc.**  
**Rate Case Expense**

Regarding Actual Postage:

\$443.53 of postage is due to Federal Express expenses. Also, one mailing was sent out to 902 customers  $(902 * .37) = \$333.74$

Regarding Actual Printing and Travel:

These expenses are included on the general ledger in rate case expense account 1863014.

Regarding Actual Envelopes:

\$51.69 is due to envelopes for one mailing.

**Labrador Utilities, Inc.**  
**Rate Case Expense**

Regarding estimates:

Travel: We anticipate one more trip for employees from the corporate office in Northbrook, IL to Florida for the Labrador rate case.

Printing: We are planning on sending out 1 more mailing in Labrador. We anticipate the mailing to be 1 page long. The mailing will go out to approximately 902 customers. This is an expense of approximately \$63.14

$(902 * \$0.07/\text{sheet} * 1 \text{ sheet}) = \$63.14$

We are also estimating another \$100 for any miscellaneous printing/copying expenses.

Postage: \$200 of postage is for estimated Federal Express mailings remaining in this rate case. The remainder is for postage; 902 customers for 1 mailing at \$0.37 per piece of postage.  
 $(902 \text{ customers} * \$0.37) = \$333.74$

Envelopes: The approximate cost of envelopes for one more mailing is as follows:  
 $(902 \text{ customers} * .05731) = \$51.69$