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October 28, 2005

HAND DELIVERY

Chairman Braulio L. Baez
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Utilities, Inc. of Longwood
2005 General Rate Increase Application
Our File No. 30057.118

Dear Chairman Baez:

This letter, pursuant to Rule 25-30.430, Florida Administrative Code, requests approval of a test year for Utilities, Inc. of Longwood ("Company"). The Company intends to submit an application for general rate relief to the Florida Public Service Commission for its wastewater system located in Seminole County, Florida. The Company intends to submit the minimum filing requirements ("MFRs") on or before December 31, 2005.

The Company has not had a rate proceeding since it was acquired in 1995. In Docket No. 950959-SU, the Commission approved the transfer of the wastewater system and established rate base in Order No. PSC-96-0448-FOF-SU, dated March 29, 1996.

The Company requests a historic test year ending June 30, 2005.

The requested test year is representative of a normal full year of operation. Although during the test year, the Company experienced some disruption from the three hurricanes that affected Seminole County, any extraordinary costs and expenses attributable to any material changes in operations and or reconstruction and repairs above and beyond those usual and customary for plant and equipment of the same age and usage patterns will be factored out of the Company's MFRs.

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Chairman Braulio L. Baez
October 28, 2005
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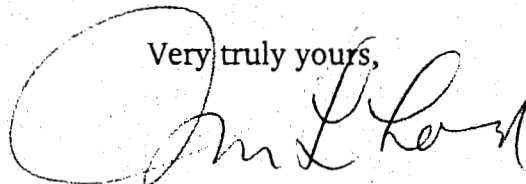
Since the Company's last rate proceeding, the Company has made major changes to plant and equipment unrelated to the effects of the hurricanes, specifically, plant and equipment upgrades and modifications, safety and security improvements, and rehabilitative work to plant grounds and percolation ponds. Within that same period of time, there have been no major changes in operational methods.

Attached is a Schedule showing major pro forma plant additions. The MFRs will include pro forma adjustments for increases in health care, insurance, purchased power, tuition reimbursement and other costs, which will be requested in this proceeding. The pro formas are non growth-related.

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

Should you or members of the Staff have any questions regarding this request, please do not hesitate to contact me.

Very truly yours,



VALERIE L. LORD
For the Firm

VLL/tlc
Enclosure

cc: Ms. Blanca Bayo, Director, Division of Commission Clerk and Administrative Services
(via hand delivery) (w/enclosure)
Mr. Troy Rendell, Division of Economic Regulation (by hand delivery) (w/enclosure)
Mr. Steve Lubertozi (w/enclosure)
Mr. Patrick C. Flynn (w/enclosure)

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Capital Projects - List

Longwood

* = has been Amended

System# State	Region #	Project Name	Start Date Complete Date	Estimated Cost Total Spent	Other Information
0648 FL	Utilities, Inc. of Longwood -- Florida	DRIVEWAY APRON AT ENTRANCE TO PLANT			
ID# 3731	Capital Planning		Past Completion Date		
0648 FL	Utilities, Inc. of Longwood -- Florida	Install clay liner around pond #3	04/01/2002 04/05/2002	\$10,000.00 \$9,660.00	96.60%
ID# 421	Closed	W/O#: 068-0648-116-02-01			
0648 FL	Utilities Inc. of Longwood -- Florida	Blower #3 Repair	01/13/2003 01/31/2003	\$5,912.00*	0.00%
ID# 1062	Closed	068-0648-3804005			
0648 FL	Utilities, Inc. of Longwood -- Florida	Shadow Hills WWTF Painting Maintenance	02/07/2003 02/08/2003	\$5,650.00	0.00%
ID# 1142	Closed	068-0648-1862063			
0648 FL	Utilities, Inc. of Longwood -- Florida	Shadow Hills WWTF Handrail Rehab.	03/01/2003 09/01/2003 *	\$12,500.00 \$9,500.00	76.00%
ID# 1122	Closed	W/O#: 068-0648-116-03-01			
0648 FL	Utilities, Inc. of Longwood -- Florida	Chlorine Conversion to Bleach - Longwood WWTP	04/01/2003 06/01/2003	\$7,300.00 \$1,527.50	20.92%
ID# 1236	Closed	W/O#: 068-0648-116-03-02			
0648 FL	Utilities, Inc. of Longwood --	Blower Set-up #1 Bearing Replacement & Rehab	09/15/2003 11/01/2003	\$8,589.81	0.00%
ID# 1620	Closed	068-0648-3804005			
0648 FL	Utilities, Inc. of Longwood -- Florida	Refurbish Surge Tank / Blast/ Coal Tar / Paint	12/01/2003 06/30/2004 *	\$41,044.00 \$52,871.18	128.82%
ID# 1299	*Completed	068-0648-1862064		*** OVER BUDGET! ***	
0648 FL	Utilities, Inc. of Longwood -- Florida	Lake Emma Road Widening Construction	10/01/2004 06/01/2006 *	\$9,720.00	0.00%
ID# 2313	Open	W/O#: 068-0648-116-04-01			
0648 FL	Utilities, Inc. of Longwood -- Florida	Longwood WWTP Chlorine Contact Chamber Rehab	07/01/2005 09/30/2005	\$24,740.00 \$24,246.25	98.00%
ID# 207	*Completed	W/O#: 068-0648-116-05-01			
0648 FL	Utilities, Inc. of Longwood -- Florida	L/S LW-5 Rehab & Ground Stabilization	08/01/2005 11/30/2005 *	\$23,500.00	0.00%
ID# 3294	Open	W/O#: 068-0648-116-05-02			

Capital Projects - List

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System# State	Region #	Project Name	Start Date Complete Date	Estimated Cost Total Spent	Other Information
0648 FL -- Florida	Utilities, Inc. of Longwood	Manhole rehab at Township Plaza	09/01/2005 12/31/2005	\$100,000.00	0.00%
ID# 209	Capital Planning	Priority: 4 - Maintenance			
0648 FL -- Florida	Utilities, Inc. of Longwood	Design & Permitting-Lake Emma Rd. Utility Relocation	09/01/2005 02/28/2006	\$25,000.00	0.00%
ID# 1302	Capital Planning	Priority: 1 - Regulatory			
0648 FL -- Florida	Utilities, Inc. of Longwood	Rehab L/S LW-7 - Sandalwood	09/01/2005 01/31/2006	\$20,000.00	0.00%
ID# 1871	Capital Planning	Priority: 4 - Maintenance			
0648 FL -- Florida	Utilities, Inc. of Longwood	Longwood Lift Station Electrical Improvements	01/01/2006 09/30/2006	\$75,000.00	0.00%
ID# 3295	Capital Planning	Priority: 4 - Maintenance			
0648 FL -- Florida	Utilities, Inc. of Longwood	Longwood L/S LW-2 Electrical Improvements	04/01/2006 06/30/2006	\$11,000.00	0.00%
ID# 2636	Capital Planning	Priority: 4 - Maintenance			
0648 FL -- Florida	Utilities, Inc. of Longwood	Engineering for Manhole Rehab - Township Plaza	05/01/2006 09/30/2006	\$7,000.00	0.00%
ID# 1868	Capital Planning	Priority: 3 - Cost Reduction			
0648 FL --	Utilities, Inc. of Longwood	Longwood WWTP Generator & ATS	06/01/2006 12/01/2006	\$75,000.00	0.00%
ID# 3458	Capital Planning	Priority: 4 - Maintenance			