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REPLY TO CENTRAL FLORIDA OFFICE

August 17, 2006

MARTIN S. FRIEDMAN, P.A.  
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BRIAN J. STREET

HAND DELIVERY

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

RECEIVED-FPSC  
06 AUG 18 AM 10:50  
COMMISSION  
CLERK

RE: Docket No. 060255-SU; Tierra Verde Utilities, Inc.'s Application for Rate Increase in Pinellas County, Florida  
Our File No.: 30057.111

Dear Ms. Bayo:

The following are the Utility's responses to the Commission Staff's July 21, 2006, correspondence identifying further deficiencies in the MFRs:

1. Rule 25-30.440 (2), F.A.C., requires that each applicant for a rate increase shall provide to the Commission a list of chemicals used for water and wastewater treatment, *by type, showing the dollar amount and quantity purchased, the unit prices paid and the dosage rates utilized.* (emphasis added) This rule does not apply to Tierra Verde Utilities, Inc. (Docket No. 060255-SU) because it has a wastewater collection system only. The deficiency responses for the other above referenced utilities reflected only a list of chemical(s) average usage levels and unit prices. In addition, based on the chemicals reflected in the MFRs of its last rate proceeding, the response for Alafaya Utilities, Inc. (Docket No. 060256-SU) failed to include all chemicals used in its wastewater treatment plant. In order to assist in meting the requirements of this Rule, please provide all information necessary in the same or similar format as shown on Attachment A. Attachment

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SGA \_\_\_\_\_  
SEC   1    
JTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

07437 AUG 18 06

FPSC-COMMISSION CLERK

Ms. Blanca Bayo  
Commission Clerk and Administrative Services Director  
Florida Public Service Commission  
August 17, 2006  
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A is the list of chemicals submitted in Docket No. 050281-WS which satisfies the requirements of Rule 25-30.440(2), F.A.C.

**RESPONSE:** The utility purchases wastewater treatment from the City of St. Petersburg. It does not use chemicals.

2. Rule 25-30.440 (8), F.A.C., requires that each applicant for a rate increase shall provide to the Commission one copy of a list of all field employees, their duties, responsibilities, and certificates held, and an explanation of each employee's salary allocation method to the Utility's capital or expense accounts. The responses to staff's first deficiency letters in the above dockets provided a list of employees that does not completely reconcile to the employees reflected in Utilities, Inc.'s cost allocation manuals for June 30, 2005, September 30, 2005, and December 31, 2005. However, the responses do not clearly show or identify what the duties are for each field employee. As such, staff suggests that the specific duties for each employee should appear immediately after the name to enable staff to identify the respective duties of each field employee. In addition, the responses to staff's first deficiency letters failed to provide an explanation of each employee's salary allocation method to each respective utility's capital or expense accounts as required by this Rule. In order to assist in meeting the requirements of this Rule, please provide all information necessary in the same or similar format as shown on Attachments B through F. Further provide a narrative explanation of how each employee's salary was allocated to each respective utility's capital or expense accounts.

**RESPONSE:** Please refer to Exhibit "A" attached hereto.

3. With regard to Schedule B-8, Comparative O&M Expenses - Wastewater for only Cypress Lakes Utilities, Inc. (Docket No. 060257-WS), the utility is required to explain any differences which are not attributable to the change in customer growth and the CPI-U. In the first deficiency letter for this docket, staff indicated that this schedule was deficient because the utility did not provide an explanation for the increase in Miscellaneous Expenses. In its response, the utility did not provide the proper explanation; rather it referred to its Exhibit G, which consists of revised cost of capital schedules. This response does not relate to the deficiency.

Ms. Blanca Bayo  
Commission Clerk and Administrative Services Director  
Florida Public Service Commission  
August 17, 2006  
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RESPONSE: Not applicable.

Very truly yours,



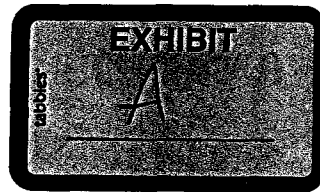
MARTIN S. FRIEDMAN  
VALERIE L. LORD  
For the Firm

VLL/mp  
Enclosures

cc: Martha Brown, Esquire, Office of General Counsel (w/o encs. - by hand delivery)  
Mr. Marshall Willis, Division of Economic Regulation (w/o encs. - by hand delivery)  
Mr. Troy Rendell, Division of Economic Regulation (w/encs. - by hand delivery)  
Ms. Mahnaz Massoudi, Division of Economic Regulation (w/encs. - by hand delivery)  
Ms. Sam Merta, Division of Economic Regulation (w/encs. - by hand delivery)  
Mr. Steve Lubertozzi (w/encs.)  
Ms. Kirsten Weeks (w/encs.)  
Mr. John Hoy (w/o encs.)  
Mr. Patrick C. Flynn (w/encs.)  
Mr. Frank Seidman (w/encs.)  
Ms. Deborah Swain (w/encs.)  
Steve Reilly, Esquire, Office of Public Counsel (w/ encs.)

M:\1 ALTAMONTE\UTILITIES INC\TIERRA VERDE\(.111) 2005 RATE CASE\PSC Clerk 04 (deficiency response 2).ltr.wpd

Tierra Verde Utilities, Inc.  
Docket No. 060255-SU  
Deficiency #2 Response



<u>Line No.</u>	<u>Employee Name</u>	<u>Total 2005</u>	<u>Acct 701</u>	<u>Capitalized Amount</u>	<u>Duties</u>
1	Michael T Dunn	\$ 4,579	\$ 4,206.50	\$ 372.50	Regional Manager; Manages operations and employees for all West Coast operations. West Coast operations include all systems located in South Florida and West Florida.
2	Patrick C Flynn	\$ 1,858	\$ 1,858.00	\$ -	Regional Director; Oversees all operations and employees in Florida.
3	John G Holdman	\$ 2,031	\$ 2,031.00	\$ -	Area Manager; Supervises the day-to-day operations for the systems within the West Coast Operation area.
4	William Lee Neal	\$ 17,314	\$ 17,314.00	\$ -	Area Manager; Supervises the day-to-day operations for the systems within the West Coast Operation area.
5	Richard Wayne Retz	\$ 2,987	\$ 2,641.00	\$ 346.00	Regional Manager; Manages operations and employees for all West Coast operations. West Coast operations include all systems located in South Florida and West Florida.
6	Anthony Wierzbicki	\$ 3,047	\$ 522.50	\$ 2,524.50	Project Manager; Manages capital projects and developer activity within South Florida and West Coast operations areas.
7	David Ray Rodriguez	\$ 900	\$ 900.00	\$ -	Area Manager; Supervises the day-to-day operations for the systems within the West Coast Operation area.
8	<b>Total</b>	<b>\$ 32,716</b>	<b>\$ 29,473</b>	<b>\$ 3,243</b>	

Note Each employee's salary is allocated to the respective company based on the number of customer equivalents.

ORIGINAL

Timolyn Henry

**From:** ROBERTS.BRENDA [ROBERTS.BRENDA@leg.state.fl.us]  
**Sent:** Friday, August 18, 2006 2:00 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Bill Walker; Cheryl Martin/Florida Public Utilities Company; John Rogers; POUCHER.EARL; Paul Lewis; CHRISTENSEN.PATTY; Cochran Keating; damund williams; Jeffrey A. Stone; John Burnette; John McWhirter; John\_Butler@fpl.com; karen white; Lee Willis; Lisa Bennett; McGLOTHLIN.JOSEPH; MERCHANT.TRICIA; Mike Twomey; Norman H. Horton; R. Alexander Glenn; Schef Wright; Tim Perry; Wade Litchfield  
**Subject:** e-filing (Dkt. 060001-EI)  
**Attachments:** 060001.fpl.nos.efiled version.doc

Electronic Filing

a. Person responsible for this electronic filing:

Patricia A. Christensen, Associate Public Counsel  
Office of Public Counsel  
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(850) 488-9330  
christen.patty@leg.state.fl.us

b. Docket No. 060001-EI

In re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive

c. Document being filed on behalf of Office of Public Counsel

d. There are a total of 3 pages.

e. The document attached for electronic filing is Citizens' Notice of Service

(See attached file: 060001.fpl.nos.efiled version.doc)

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SGA \_\_\_\_\_  
SEC   1   \_\_\_\_\_  
OTH \_\_\_\_\_

Thank you for your attention and cooperation to this request.

Brenda S. Roberts  
Office of Public Counsel  
Telephone: (850) 488-9330  
Fax: (850) 488-4491

DOCUMENT NUMBER-DATE

07456 AUG 18 06

FPSC-COMMISSION CLERK

8/18/2006

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power )  
Cost Recovery Clause with )  
Generating Performance Incentive )  
Factor )  
\_\_\_\_\_ )

DOCKET NO. 060001-EI

FILED: August 18, 2006

NOTICE OF SERVICE

Pursuant to Section 350.0611, Florida Statutes, the Citizens of the State of Florida, by and through Harold McLean, Public Counsel, serve this notice that they have served their Second Set of Interrogatories (Nos. 3-8) and their Second Set of Requests for Production of Documents (No. 5) to John T. Butler, P.A., Florida Power & Light Company, 9250 West Flagler Street, Miami, FL 33174 on the 18<sup>th</sup> day of August, 2006.

Harold McLean  
Public Counsel

s/ Patricia A. Christensen  
Patricia A. Christensen  
Associate Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Attorney for the Citizens  
of the State of Florida

DOCUMENT NUMBER-DATE

07456 AUG 18 06

FPSC-COMMISSION CLERK

DOCKET NO. 060001-EI  
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Office of Public Counsel's Notice of Service of their Second Set of Interrogatories (Nos. 3-8) and their Second Set of Requests for Procudion of Documents (No. 5) to Florida Power & Light Company has been furnished by electronic mail and U.S. Mail on this 18<sup>th</sup> day of August, 2006, to the following:

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Associate Public Counsel