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GENERAL COUNSEL  
PATRICK L. "BOOTER" IMHOF  
(850) 413-6199

Public Service Commission

September 25, 2009

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COMMISSION  
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F. Marshall Deterding  
Rose, Sundstrom & Bentley, LLP  
2548 Blairstone Pines Dr.  
Tallahassee, FL 32301

Staff's First Data Request  
Nos. 1-7

**Re: 080695-WU, In re: Application for general rate increase by Peoples Water Service Company of Florida, Inc.**

Dear Mr. Deterding:

By this letter, the Commission staff requests that Peoples Water Service Company of Florida, Inc. (company or utility), provide responses to the following data and document requests:

1. For purposes of the following questions, please refer to Commission Staff's Final Audit Report for Peoples Water Service Company of Florida, Inc., dated September 16, 2009. Audit Finding No. 3 states that, based on a judgmental sample of billing data for Multi-Residential customers with meter sizes greater than 5/8", the utility failed to apply the appropriate corresponding monthly gallonage allotment (minimum) to customers' bills. Instead, the utility applied the 5/8" gallonage allotment (minimum) to all non-5/8" bills.
  - a. Please explain the reason(s) for treating the Multi-Residential customers in this manner.
  - b. Please provide the month and year that the utility began the billing practice for Multi-Residential customers referenced in Audit Finding No. 3 above.
  - c. Please provide, by individual meter, a monthly listing of the beginning and ending meter reading for all Multi-Residential customers. Please provide the information in the format provided below.

DOCUMENT NUMBER - DATE

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| <u>Customer Name</u> | <u>Meter Size / Meter No.</u> | <u>Service Address of Meter</u> | <u>Month/Year</u> | <u>Beginning Meter Reading</u> | <u>Ending Meter Reading</u> |
|----------------------|-------------------------------|---------------------------------|-------------------|--------------------------------|-----------------------------|
|                      |                               |                                 |                   |                                |                             |
|                      |                               |                                 |                   |                                |                             |
|                      |                               |                                 |                   |                                |                             |

- d. Did the utility treat any of its General Service customers in the same manner as the Multi-Residential customers referenced in Audit Finding No. 3 above?
- e. If the response to subsection (d) is negative, please explain why, for billing purposes, the utility treated the General Service customers differently than the Multi-Residential customers referenced in Audit Finding No. 3 above.
- f. If the response to subsection (d) is affirmative, please explain the reason(s) for treating the General Service customers in this manner.
- g. If the response to subsection (d) is affirmative, please provide the month and year that the utility began the billing practice for those General Service customers.
- h. Please provide, by individual meter, a monthly listing of the beginning and ending meter reading for all General Service customers. Please provide the information in the format provided below:

| <u>Customer Name</u> | <u>Meter Size / Meter No.</u> | <u>Service Address of Meter</u> | <u>Month/Year</u> | <u>Beginning Meter Reading</u> | <u>Ending Meter Reading</u> |
|----------------------|-------------------------------|---------------------------------|-------------------|--------------------------------|-----------------------------|
|                      |                               |                                 |                   |                                |                             |
|                      |                               |                                 |                   |                                |                             |
|                      |                               |                                 |                   |                                |                             |

- i. Did the utility treat any of its Public Authority customers in the same manner as the Multi-Residential customers referenced in Audit Finding No. 3 above?

- j. If the response to Audit Finding No. 3 is negative, please explain why, for billing purposes, the utility treated the Public Authority customers differently than the Multi-Residential customers referenced in Audit Finding No. 3 above.
- k. If the response to Audit Finding No. 3 is affirmative, please explain the reason(s) for treating the Public Authority customers in this manner.
- l. If the response to Audit Finding No. 3 is affirmative, please provide the month and year that the utility began the billing practice for those Public Authority customers.
- m. Please provide, by individual meter, a monthly listing of the beginning and ending meter reading for all Public Authority customers. Please provide the information in the format provided below:

| <u>Customer Name</u> | <u>Meter Size / Meter No.</u> | <u>Service Address of Meter</u> | <u>Month/Year</u> | <u>Beginning Meter Reading</u> | <u>Ending Meter Reading</u> |
|----------------------|-------------------------------|---------------------------------|-------------------|--------------------------------|-----------------------------|
|                      |                               |                                 |                   |                                |                             |
|                      |                               |                                 |                   |                                |                             |
|                      |                               |                                 |                   |                                |                             |

- 2. Schedule B-13 notes that Peoples Water Service Company of Florida, Inc., made adjustments to adopt Public Service Commission (PSC) guideline rates beginning in the test year. Please list depreciation rates by account which the company was using for utility plant prior to the test year.
- 3. Schedule A-5 shows a test year adjustment of \$213,444 for Meters and Meter installations. Please describe what this work was for and if the job is now complete.
- 4. Schedule B-10 of the MFRs shows an estimate of \$25,000 for work performed by Robert Nixon of Cronin, Jackson, Nixon, and Wilson. Please provide invoices for all rate case work performed by Mr. Nixon in connection with Docket No. 080695-WU. Invoices should include the date of the work performed, the number of hours spent on each task, the hourly rate charged, a description of the work performed, and any estimated cost to complete the rate case, if any.

F. Marshall Deterding

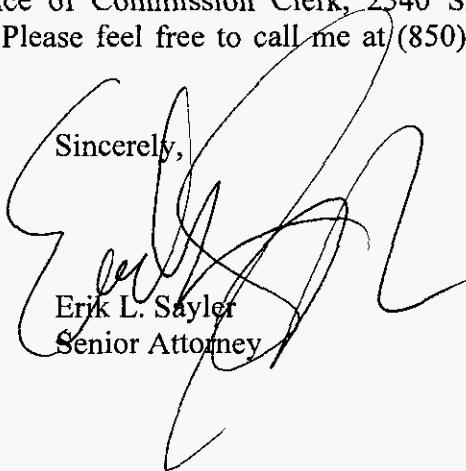
Page 4

September 25, 2009

5. Schedule B-10 of the MFRs shows an estimate of \$35,000 for work performed by Paul DeChario of Cronin, Jackson, Nixon, and Wilson. Please provide invoices for all rate case work performed by Mr. DeChario in connection with Docket No. 080695-WU. Invoices should include the date of the work performed, the number of hours spent on each task, the hourly rate charged, a description of the work performed, and any estimated cost to complete the rate case, if any.
6. Schedule B-10 of the MFRs shows an estimate of \$35,000 for work performed by F. Marshall Deterding of Rose Sundstrom & Bentley. Please provide invoices for all rate case work performed by Mr. Deterding of Rose Sundstrom & Bentley in connection with Docket No. 080695-WU. Invoices should include the date of the work performed, the number of hours spent on each task, the hourly rate charged, a description of the work performed, and any estimated cost to complete the rate case, if any.
7. Schedule B-10 of the MFRs shows an estimate of \$25,000 for Notices, customer meeting, misc. Please provide invoices for all company rate case expenses incurred in connection with Docket No. 080695-WU along with any estimated costs to complete the rate case, if any.

Please file the original and five copies of the requested information by October 9, 2009, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6084 if you have any questions.

Sincerely,



Erik L. Saylor  
Senior Attorney

ELS/av

cc: Office of Commission Clerk  
Peoples Water Service Company of Florida, Inc.  
Economic Regulation  
Regulatory Compliance