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March 19, 2010

HAND DELIVERY

Chairman Nancy Argenziano
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

100149-WU

RECEIVED-FPSC
10 MAR 29 AM 10:31
COMMISSION
CLERK

Re: Ni Florida, LLC - Tamiami
General Rate Increase Application for Lee County System
Our File No.: 43053.04

Dear Chairman Argenziano:

This letter, pursuant to Rule 25-30.430, Florida Administrative Code, requests approval of a test year for Ni Florida, LLC (the "Company"). The Company intends to submit an application for general rate relief to the Florida Public Service Commission for its water system located in Lee County, Florida. The Company intends to submit the minimum filing requirements ("MFRs") on or before September 30, 2010.

The Company's last rate proceeding was a Rate Case in Docket No. 910560-WS, which culminated in PSC Order No. PSC-92-0807-FOF-WS, issued August 31, 1992, based upon a July 31, 1991, Test Year. Rate base was established as of December 31, 2007, in PSC Order No. PSC-09-0260-PAA-WU, issued in Docket No. 080183-WU on April 27, 2009.

The Company requests an historic test year ending December 31, 2009. The requested test year is representative of a normal full year of operation.

COM _____
APA _____
ECR 1 In the most recent 18 months, the Company has made major changes to plant and equipment, specifically, distribution system improvements.

GCL 1
RAD _____ The MFRs will include pro forma adjustments for increases in contract services costs as well as adjustments for capital expenditures related to replacing isolations
SSC _____

ADM _____
OPC 1
CLK _____

Argenziano

DOCUMENT NUMBER-DATE

02198 MAR 29 2010

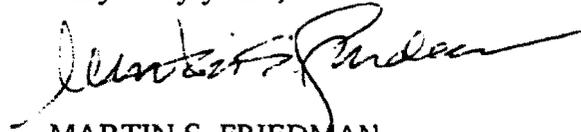
FPSC-COMMISSION CLERK

values, and for meter replacement and update piping. 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,



MARTIN S. FRIEDMAN
For the Firm

MSF/mp/der

cc: Ed Wallace, President (via e-mail)
Mr. Benny Wilkinson (via e-mail)
Mr. Donald Clayton (via e-mail)
Mr. Bart Fletcher (via e-mail)