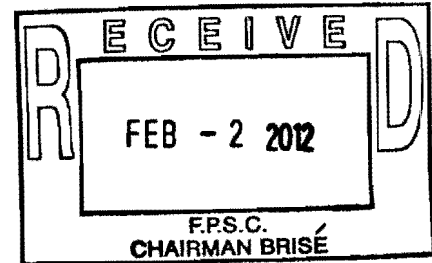


120037 - WS

February 1, 2012

OVERNIGHT DELIVERY

Chairman Ronald A. Brisé
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850



RE: Utilities, Inc. of Pennbrooke
2011 General Rate Increase Application
Our File No. 30057.205

Dear Chairman Brisé:

This letter, pursuant to Rule 25-30.430, Florida Administrative Code, requests approval of a test year for Utilities, Inc. of Pennbrooke (the "Company"). The Company intends to submit an application for general rate relief to the Florida Public Service Commission for its water and wastewater systems located in Lake County, Florida. The Company intends to submit the minimum filing requirements ("MFRs") on or before March 31, 2012.

The Company's last rate proceeding was in Docket No. 090392-WS utilizing a test year ending December 31, 2008, which culminated in Order No. PSC 10-0400-CO-WS dated July 31, 2010.

The Company requests a historic test year ending September 30, 2011. The requested test year is representative of a normal full year of operation. However, there will be pro forma adjustments to expenses to reflect expenses in the year when rates will be in effect.

Since the Company's last rate proceeding, the Company has experienced increases in O & M expense, including the expense categories of: taxes; cleaning supplies; sewer testing/monitoring; and office landscape/mowing.

The Company anticipates including the following pro forma plant addition, which is a water related project to be constructed within 24 months of the proposed test year end of September 30, 2011:

DOCUMENT NUMBER DATE

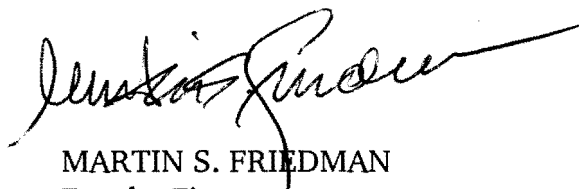
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Well # 1 Replacement. This project is required to replace the existing well casing that has become detached at a point where a liner was previously installed. This condition allows the well casing to move within the bore hole and strike the rotating well pump assembly with each pump run cycle. The project cost is approximately \$500,000.

Pursuant to Section 367.081 (8), Florida Statutes, the Company requests that the Commission process this Application 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

cc: John Hoy, Chief Regulatory Officer (via email)
Ms. Kirsten E. Markwell (via email)
Patrick C. Flynn, Regional Director (via email)
John Williams, Director of Governmental Affairs (via email)
Mr. Andrew Maurey, Division of Economic Regulation (via email)
Mr. Bart Fletcher, Division of Economic Regulation (via email)