

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

120235-WS

DATE: September 19, 2012
TO: Ann Cole, Commission Clerk, Office of Commission Clerk
FROM: Pamela Paultre, Executive Secretary to Chairman Brisé
RE: New Docket

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 COMMISSION
 CLERK

Please assign the enclosed document on behalf of Ni Florida, LLC to a new docket number.
Thank you.

DOCUMENT NUMBER-DATE

06306 SEP 19 2012

FPSC-COMMISSION CLERK

RUTLEDGE, ECENIA & PURNELL

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

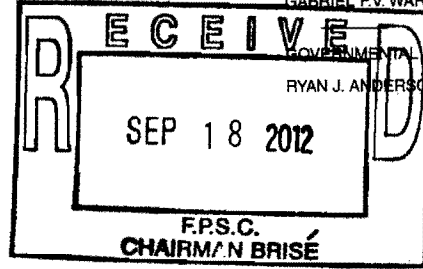
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September 18, 2012

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120235-WS

Via Hand Delivery

Chairman Brisé
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: Ni Florida, LLC
General rate increase application for its wastewater facility in Pasco County (SU 915)
and water facility in Lee County (WU 920)

Dear Chairman:

Pursuant to Rule 25-30.430, Florida Administrative Code, please consider this correspondence a formal request for approval of a test year for Ni Florida, LLC ("Ni Florida"). Ni Florida intends to submit an application for general rate relief to the Florida Public Service Commission for its water and wastewater systems located in Florida. The company intends to submit the Minimum Filing Requirements ("MFRs") on or before October 15, 2012. The company's last rate proceeding for its wastewater facility in Pasco County, Florida was in Docket No. 090182-SU which culminated in Order No. PSC-10-0168-PAA-SU issued March 23, 2010. The company's last rate proceeding for the water system in Lee County was in Docket No. 100149 which culminated in Order No. PSC-11-0199-PAA-WU issued April 22, 2011.

Ni Florida requests an historic test year ending December 31, 2011. The requested test year is representative of a normal full year of operation.

The MFRs will include pro forma adjustments for purchased wastewater treatment expense due to increased wastewater flow due to recalibration, an erroneous billing multiple by Pasco county, processing fees for a new online bill payment option, increased bad debt expense, purchased water for a regulated system due to a price increase and expected fixed asset expenditures budgeted through December 31, 2012.

Pursuant to section 367.01(8), Florida Statutes, Ni Florida requests that the Commission process the petition for rate relief using the proposed agency action procedure.

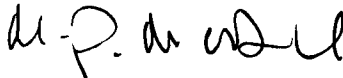
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RUTLEDGE, ECENIA & PURNELL

Chairman Brisé
Florida Public Service Commission
September 18, 2012
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Ni Florida will also request interim rates based on the historic test year. Should you or any member of the staff have any questions regarding this request, please do not hesitate to contact me.

Sincerely,


Martin P. McDonnell

MPM/vp