

RUTLEDGE ECENIA

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

MICHAEL J. BARRY
STEPHEN A. ECENIA
RICHARD M. ELLIS
DIANA M. FERGUSON
MARTIN P. McDONNELL
J. STEPHEN MENTON
R. DAVID PRESCOTT

POST OFFICE BOX 551, 32302-0551
119 SOUTH MONROE STREET, SUITE 202
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

February 14, 2013

MARSHA E. RULE
GARY R. RUTLEDGE
MAGGIE M. SCHULTZ
GABRIEL F.V. WARREN
GOVERNMENTAL CONSULTANT
JONATHAN M. COSTELLO
OF COUNSEL
HAROLD F. X. PURNELL

VIA HAND DELIVERY

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

Re: Docket No. 130010-WS
Application for Increase in Water Rates in Lee County (WU 920) and
Wastewater Rates in Pasco County (SU 915)

RECEIVED-FPSC
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COMMISSION
CLERK

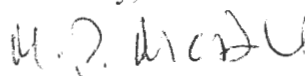
Dear Chairman Brise:

On January 2, 2013, Ni Florida, LLC ("Ni Florida") sought approval of a test year ending September 30, 2012 as it intends to submit an application for general rate relief to the Florida Public Service Commission for its water and wastewater systems located in Florida. Accompanying that letter as Exhibit A was Ni Florida's detailed Pro Forma Adjustments to the requested test year. By letter dated, January 11, 2013, you approved the requested historic test year, and advised that Ni Florida should file the Minimum Filing Requirements ("MFRs") no later than February 28, 2013.

In finalizing the MFRs, Ni Florida identified pertinent revisions to the Pro Forma Adjustments reflecting additional capital expenses and revisions to bad debt. The revised Pro Forma Adjustments reflect Ni Florida's pertinent financial status on a going forward basis. A copy of the revised Pro Forma Adjustments is attached hereto as Exhibit A.

Ni Florida still wishes to file its MFRs on or before February 28, 2013. If these revised Pro Forma Adjustments in any way alter the January 11, 2013 letter approving our test year, it would be greatly appreciated if you could please let me know. Otherwise, we will remain vigilant in order to file our MFRs prior to the recommended filing date of February 28, 2013.

Sincerely,



Martin P. McDonnell

Attachment

DOCUMENT NUMBER - DATE

00862 FEB 15 2013

FPSC-COMMISSION CLERK

NI FLORIDA, LLC
REVISED PRO FORMA ADJUSTMENTS¹

Plant In Service – Sewer - \$577,500 (Capital Expenditures to be completed by June 30, 2013)

Operation and Maintenance (O&M) – Water

Purchases Water	\$5,615 (to reflect price change)
Bank Charges	4,893 (to reflect charges for the new online Payment Processing System)
Bad Debts	3,079 (to reflect higher bad debt expense)
Legal Expenses related to prior rate case	(103) (to adjust legal expense)

Operation and Maintenance (O&M) – Sewer

Purchases Treatment	\$19,200 (to annualize price increase)
Contract Line Cleaning Program	100,000 (to uncover and repair I and I issues)
Bank Charges	17,992 (to reflect charges for the new online Payment Processing System)
Bad Debts	(16,838) (to reflect lower bad debt expense)

¹ Only changes from the Pro Forma Adjustments filed January 2, 2013 are to Plant In Service expenditures and bad debt expense.

