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DIVISION OF ENGINEERING
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Public Service Commission

May 16, 2013

RECEIVED-FPSC
13 MAY 16 PM 2:00
COMMISSION
CLERK

Mr. Martin P. McDonnell
Rutledge, Ecenia & Purnell
119 South Monroe Street, Suite 202
Tallahassee, FL 32301-1841

Re: Docket No. 130010-WS – Application for increase in water rates in Lee County and wastewater rates in Pasco County by Ni Florida, LLC.

Dear Mr. McDonnell:

The technical staff of the Commission has reviewed the revised minimum filing requirements (MFRs) submitted on April 30, 2013, on behalf of Ni Florida, LLC. At this time, the revised MFRs are still deficient and the specific deficiencies are identified below:

1. Rule 25-30.437, F.A.C., requires that each Class A utility applying for a rate increase shall provide the information required by Commission Form PSC/ECR 19-W (11/93), titled "Class A Water and/or Wastewater Utilities Financial, Rate and Engineering Minimum Filing Requirements." The following MFR schedules, as filed, do not comply with Rule 25-30.437, F.A.C.
 - a. MFR Schedule B-8, Schedule of Operation & Maintenance Expense Comparison, page 1 of 1, column (2) does not tie to the amount approved in Order No. PSC-10-0168-PAA-SU.
2. Rule 25-30.436, F.A.C. requires that each schedule be cross-referenced to identify related schedules as either supporting or recap schedules. The Utility did not list recap schedules on MFR Schedules A-12 and D-1.
3. A review of MFR Schedule E-14, page 1 of 165 indicates the Utility incorrectly calculated reverse bills presented in column 6 for the residential class.
4. A review of MFR Schedule E-14, pages 2-14 indicates the Utility incorrectly calculated reverse bills presented in column 6 for general service class.
5. A review of MFR Schedule E-14 indicates the consolidated factor presented in column 7 is calculated incorrectly for the water system.

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Martin McDonnell

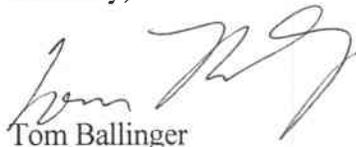
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6. Total gallons indicated for 5/8", 1", and 1 1/2" meter sizes for the general service class shown on MFR Schedule E-2, page 1 of 2 do not match the cumulative gallons shown on MFR Schedule E-14, pages 2, 3, and 7.
7. Total residential gallons shown on MFR Schedule E-2, page 1 of 2 do not match cumulative gallons shown on MFR Schedule E-14.
8. Total general service bills shown on MFR Schedule E-3, page 1 do not match total bills shown MFR Schedule E-2, page 1 of 2.
9. Total general service bills shown on MFR Schedule E-3 do not match total bills shown on MFR Schedule E-2, page 2 of 2.
10. A review of MFR Schedule E-14, page 15 indicates the Utility incorrectly calculated reverse bills presented in column 6 for residential wastewater.
11. A review of MFR Schedule E-14, pages 16-165 indicates the Utility did not calculate reverse bills presented in column 6 for the general service class.
12. A review of MFR Schedule E-14 indicates the consolidated factor presented in column 7 is calculated incorrectly for the wastewater system.

If any above corrections require a corresponding change to any other MFR schedules, those corrected schedules must also be submitted in accordance with Rule 25-30.436(4)(e), F.A.C. These corrections should be submitted no later than June 17, 2013. Your petition will not be deemed filed until the deficiencies identified in this letter have been corrected.

Sincerely,



Tom Ballinger
Director, Division of Engineering

ML

cc: Division of Engineering (L'Amoreaux, Rieger)
Division of Accounting & Finance (A. Smith)
Division of Economic (Bruce, Hudson)
Office of General Counsel (Brownless, Crawford)
Office of Commission Clerk (Docket No. 130010-WS)