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Public Service Commission

February 27, 2015

Mr. Martin S. Friedman, Esquire
766 North Sun Drive, Suite 4030
Lake Mary, Florida 32746
mfriedman@sfflaw.com

STAFF'S EIGHTH DATA REQUEST
via e-mail

Re: Docket No. 140135-WS - Application for increase in water/wastewater rates in Pasco County by Labrador Utilities, Inc.

Dear Mr. Friedman:

By this letter, the Commission staff requests that Labrador Utilities, Inc. (Labrador) provide a response to the following data requests.

Rate Case Expense

- 1) Please clarify if any of the Water Service Corporation (WSC) employees' capitalized time spent on the rate case was compensated as overtime pay for hourly employees or bonuses for salaried employees. If so, please provide a breakdown of the amount by employee.
- 2) Based on the itemized descriptions of rate case work performed by WSC employees, approximately 27 hours of various MFR preparation are recorded for Patrick Flynn. In addition, Darrien Pitts' hours reflect approximately 53 hours for preparation of MFR schedules A, B, D, and E, and an additional 25 hours for the preparation of the chemical and transportation schedules. Please explain why the WSC In-House hours related to MFR preparation are not duplicative of the approximately 357 hours for MFR preparation and review that Milian, Swain and Associates, Inc. documented in its rate case expense support documentation.
- 3) Based on the itemized descriptions of rate case work performed by WSC employees, Darrien Pitts spent approximately 144 hours responding to audit requests. Please provide a detailed description of the work performed and information provided for each entry, including whether the time was related to prior Commission-ordered adjustments the Utility had not made.

Miscellaneous Expense

- 4) According to the affiliate audit conducted for Utilities, Inc. in this docket, audit staff noted expenses totaling approximately \$46,000 in Account 6185 - Travel/Lodging related to a leadership meeting held at the Rosen Center Hotel during the test year ending December 31, 2013.
 - a) Please provide a breakdown by vendor, amount, and allocation of the total expenses associated with this meeting.
 - b) Please explain the details of the meeting, including, but not limited to its purpose, who at Labrador Utilities, Inc. attended, and how often it has been held annually. In addition, please explain why the level of expense is reasonable and should be allocated to the Utility.

Please file the original and five copies of the requested information by Monday, March 10, 2015, with Carlotta Stauffer, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6230 if you have any questions.

Sincerely,

/s/ Kyesha Mapp

Kyesha Mapp
Attorney

KRM:as

cc: Office of Commission Clerk
Office of Public Counsel (Kelly, Reilly)