

COMMISSIONERS:
ART GRAHAM, CHAIRMAN
LISA POLAK EDGAR
RONALD A. BRISÉ
JULIE I. BROWN
JIMMY PATRONIS

STATE OF FLORIDA



OFFICE OF THE GENERAL COUNSEL
CHARLIE BECK
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

October 7, 2015

STAFF'S FOURTH DATA REQUEST

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

Re: Docket No. 150102-SU - Application for increase in wastewater rates in Charlotte County by Utilities, Inc. of Sandalhaven

Dear Mr. Friedman:

By this letter, Commission staff requests that Utilities, Inc. of Sandalhaven (Sandalhaven or utility) provide responses to the following data requests:

1. In Staff's Second Data Request, Question No. 17, the utility was asked to provide a list of all general service customers by meter size. In response, the utility provided a list that identified the general service customers by meter size as either "256 Sandalhaven Wastewater General Service" or "256 Sandalhaven Wastewater Multi-Residential". For the list provided by the utility in its response, please specify the names and addresses of the general service and multi-residential customers. For multi-residential customers, please indicate the number of units.
2. For each general service and multi-residential customer, please provide the test year gallons associated with the respective customer.
3. Please provide the name and address of the general service customer that requested to down-size its meter from 1.5" to 5/8" x 3/4".
4. In Staff's Second Data Request, Question No. 14, the utility was asked to provide a schedule showing the number of equivalent residential connections (ERCs) connected, to date, by year since the implementation of the Allowance for Funds Prudently Invested (AFPI) charges established by Charlotte County. The Utility provided a table indicating the number of ERCs at year end from 2010 through 2014. Please provide a response to the following questions in regards to the table.

- a. The year-end number of ERCs for 2010 was indicated as 1,006.5. The note provided in Table 24 of the Charlotte County recommended rate report indicated the number of existing ERCs as of December 31, 2010 were 1,123, which included the Reserve Capacity ERCs. Please explain the difference in the number of ERCs.
 - b. The year end number of ERCs for 2012 decreased from the year end number for 2011. The number of ERCs would not decrease when evaluating the ERCs for AFPI. AFPI charges are a one-time charge paid per ERC at the time of an initial connection. Therefore, the number of ERCs would increase over time. However, when counting ERCs based on existing customers, the number may fluctuate. Please explain why the number of ERCs provided for purposes of AFPI fluctuated.
 - c. Please provide the number of ERCs remaining to build out.
5. To follow up on questions from staff's September 15, 2015 site visit, please complete the following table. Please make necessary corrections, if any, for the lift station power meters.

| SANDALHAVEN | | | | |
|------------------|------------------|--------------------|-----------------|----------------|
| LIFT STATIONS | | | | |
| Lift Station No. | Address/Location | Power Meter Number | Pump Motor (hp) | Capacity (gpm) |
| LS-1 | | KJ14780 | | |
| LS-2 | | AC83591 | | |
| LS-3 | | KJ15654 | | |
| LS-4 | | | | |
| LS-5 | | ACD1553 | | |
| LS-6 | | ACD9841 | | |
| LS-7 | | ACD8684 | | |
| LS-8 | | AC74086 | | |
| LS-9 | | KJ15653 | | |
| LS-10 | | AC74135 | | |
| LS-11 | | KJJ6694 | | |
| LS-12 | | KJ15642 | | |
| LS-13 | | 6NL4409 | | |

6. When did the Utility realize that the growth it had projected during its 2006 rate case with the Commission was not going to materialize?

7. Since that time, what steps has the Utility taken to mitigate the cost impact(s) of the unrealized growth?
8. Please refer to the Utility's response to questions 20-23 of Staff's Second Data Request dated August 25, 2015. Staff understands that the services provided by some of the vendors involved in constructing the interconnection force main would be unaffected by the size of the force main.. Given this, please estimate the incremental cost difference, if any, between having a 1,000,000 gallons per day (gpd) force main and a 500,000 gpd force main. Please explain your response.
9. Please refer Schedule F-7 of the Minimum Filing Requirements.
 - a. In the paragraph pertaining to the force main, the Utility states it "constructed a 12" force main, adequate to handle anticipated demand." Please explain the Utility's basis at that time for anticipating a demand of 1,000,000 gpd for the force main while negotiating a contract with Englewood Water District for a maximum capacity of 500,000 gpd.
 - b. In the paragraph pertaining to the master lift station serving the force main, the Utility states it "constructed a receiving well for the master lift station adequate for total demand," and equipped it with "pumping capacity adequate for current demand and near term growth." Please provide the capacities, in gallons per day, of the receiving well constructed and the pumps installed in the master lift station.

Please respond to staff's data request by October 17, 2015 to allow this docket to be processed within the statutory time frame. Furthermore, please submit the following information to the Office of Commission Clerk, Docket No. 150102-SU, Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399-0850. The information should not be addressed to staff. If you have any questions, please feel free to contact me at (850) 413-6218.

Sincerely,

/s/ Suzanne Brownless

Suzanne Brownless
Senior Attorney

SBr/as

cc: Office of Commission Clerk