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Public Service Commission

October 21, 2015

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Mr. F. Marshall Deterding
Sundstrom & Mindlin, LLP
2548 Blairstone Pines Drive
Tallahassee, FL 32301

STAFF'S FIRST DATA REQUEST

Re: Docket No. 150170-WS - Application for increase in water and wastewater rates in Lee and Pasco Counties by Ni Florida, LLC.

Dear Mr. Deterding:

By this letter, the Commission staff requests that Ni Florida, LLC (Ni Florida or utility) provide responses to the following data requests:

1. Please refer to MFR Schedule B-3, lines 2-4. Please provide support documentation reflecting the new rates and the effective dates of the increases for purchased water and wastewater.
2. Please refer to MFR Schedule B-3, line 8. Please provide an explanation of the "Adjustment to reflect new contract for reconnections" and provide any related support documentation.
3. According to MFR Schedule B-5, the following water operations and maintenance (O&M) test year expenses increased substantially in the months indicated below compared to other months. Please explain the increase and provide an itemized breakdown of the costs for each month. For Purchased Water, Regulatory Commission Expense, and Contractual Services - Other, please provide all the invoices for each month.
 - a. The \$9,099, \$9,717, \$10,536, \$7,874, \$6,170, and \$8,906 amounts shown for January 2014, February 2014, March 2014, April 2014, November 2014 and December 2014, respectively, for Purchased Water, Acct. No. 610.
 - b. The \$3,945 amount shown in April 2014 for Contractual Services - Other, Acct. No. 636.
 - c. The \$2,320 and \$3,093 amounts shown for January 2014 and February 2014, respectively, for Reg. Comm. Exp. - Rate Case Amort., Acct. No. 666.

- d. The \$1,888 and \$100,594 amounts shown for August 2014 and December 2014, respectively, for Miscellaneous Expenses, Acct. No. 675.
4. According to MFR Schedule B-6, the following wastewater O&M test year expenses increased substantially in the months indicated below compared to other months. Please explain the increase and provide an itemized breakdown of the cost for each month. For Contractual Services – Other and Regulatory Commission Expense, please provide all invoices for each month.
 - a. The \$12,640, \$12,779, \$10,698, \$10,147, \$19,292, \$26,117, \$11,260, and \$21,336 amounts shown in March 2014, April 2014, June 2014, July 2014, August 2014, October 2014, November 2014, and December 2014, respectively, for Contractual Services - Other, Acct. No. 736.
 - b. The \$8,729 and \$11,637 amounts shown for January 2014 and February 2014, respectively, for Regulatory Commission Expense – Amortization of Rate Case Expense, Acct. No. 766.
 - c. The \$1,088 and \$380,577 amounts shown in June 2014 and December 2014, respectively, for Miscellaneous Expenses, Acct. No. 775.
 5. Please explain the increase in Bad Debt Expense (409.38 percent) and Miscellaneous Expenses (84.36 percent) between the prior test year and the current test year as referenced in MFR Schedule B-7.
 6. Please explain the increase in Contractual Services - Legal (2,691.72 percent), Contractual Services – Other (29.54 percent), and Miscellaneous Expenses (157.14 percent) between the prior test year and the current test year as referenced in MFR Schedule B-8.
 7. The following items relate to the Utility's requested rate case expense on MFR Schedule B-10.
 - a. For each individual person, in each firm providing consulting services to the applicant pertaining to this docket, provide the billing rate, and an itemized description of work performed. Please provide detail of hours worked associated with each activity. Also provide a description and associated cost for all expenses incurred to date.
 - b. For each firm or consultant providing services for the applicant in this docket, please provide copies of all invoices for services provided to date.
 - c. If rate consultant invoices are not broken down by hour, please provide reports that detail by hour, a description of actual duties performed, and amount incurred to date.
 - d. Please provide an estimate of costs to complete the case by hour for each consultant or employee, including a description of estimated work to be performed, and detail of

the estimated remaining expense to be incurred through the Proposed Agency Action (PAA) process.

- e. Please provide an itemized list of all other costs estimated to be incurred through the PAA process.
8. On MFR Schedule E-4, page 2 of 2, for wastewater, the utility indicated that the proposed rates for reconnections and meter re-reads are based on a new contract with Pasco County. Please provide a copy of the Pasco County contract.
9. For the water and wastewater systems, please provide, separately, the name and address of each general service customer by meter size.
10. For the water system, please provide the total number of units in the RV park. Please indicate whether the RV park has a clubhouse, pool, or other common area.
11. For the wastewater system, the utility provides service to a mobile home park as a bulk customer; please provide the number of units in the mobile home park. Please indicate whether the mobile home park has a clubhouse, pool, or other common area.
12. As filed, Schedule F-1 provides information for a test-year ended September 2012. Please provide Schedule F-1 for the historical test-year ended on December 31, 2014.
13. Regarding the retirements related to the Hudson Beach lift station project and the Tower Drive collection system replacement project identified on Schedule A-3, please describe how the retirement amounts were developed.
14. If any plant addition has been made or will be required due to a written order from a governmental agency, please provide a copy of that order.
15. Please fill out the spreadsheet attached concerning any pro forma items included in the Utility's filing. Please include:
 - a. a description of the pro forma project,
 - b. anticipated start date and completion date of the project,
 - c. the estimated cost of the project,
 - d. the appropriate NARUC account number,
 - e. any bid proposals or contracts for the pro forma items, and
 - f. if there are any associated retirements for the NARUC account.

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Please file all responses electronically no later than Thursday, November 12, 2015, from the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6550 or by email at tbrown@psc.state.fl.us, if you have any questions.

Best regards,

A handwritten signature in black ink, appearing to read 'TMB', with a long horizontal flourish extending to the right.

Todd M. Brown
Public Utilities Supervisor
Division of Accounting and Finance

cc: Office of Commission Clerk (Docket No. 150170-WS)