



June 19, 2017

VIA E-FILING

Carlotta S. Stauffer, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Docket No.: 160176-WS; Application for Staff Assisted Rate Case in Polk County by
Four Lakes Golf Club, Ltd.
Our File No.: 45027.02

Dear Ms. Stauffer:

Four Lakes Golf Club, Ltd., (“Utility”) has the following comments on two issues in the Staff’s Preliminary Report dated June 9, 2017:

Issue 6 – Contractual Services – Billing. The Utility will address this issue in its response to Staff’s Third Data request.

Issue 8 – Rate Structure. The Preliminary Staff Report recommends that 40% of the water revenue requirement be recovered through the base facility charge. While the Commission typically sets the bfc is no greater than 40%, when the customer base is seasonal, the recovery of the revenue requirement through the bfc is higher. The customer base at Four Lakes is estimated at 30% which puts it in the seasonal classification. When the Commission has determined the customer base is 30% seasonal the bfc has been established at percentages between 50% and 56%. See PSC Orders Nos. PSC-17-0209-PAA-WU (56%), PSC-12-0433-PAA-WS (55%), PSC-14-0335-PAA-WS, and PSC-15-0208-PAA-WS (50%). Even with some seasonality of 24% the Commission has set the bfc at 50%. PSC Order No. PSC-15-0592-PAA-WU. The Utility requests that 55% of the revenue requirement be recovered through the bfc.

Please do not hesitate to contact me should you or technical staff have any questions regarding this filing.

Very truly yours,

/s/ Martin S. Friedman

MARTIN S. FRIEDMAN
For the firm

MSF/

cc: Brian Altman (via email)