

COMMISSIONERS:  
ART GRAHAM, CHAIRMAN  
JULIE I. BROWN  
DONALD J. POLMANN  
GARY F. CLARK  
ANDREW GILES FAY

STATE OF FLORIDA



DIVISION OF ECONOMICS  
JUDY HARLOW  
DIRECTOR  
(850) 413-6842

September 30, 2019

Martin S. Friedman, Esquire  
Dean Mead  
420 S. Orange Ave., Suite 700  
Orlando, FL 32801

**STAFF'S THIRD DATA REQUEST**

**Re: Docket No. 20190031-WU - In re: Application for increase in water rates in Highlands County by Placid Lakes Utilities, Inc.**

Dear Mr. Friedman:

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

1. Please provide the updated rate case expense with all support documentation for Placid Lakes Utilities, Inc. In addition, please include an updated estimate of rate case expense to be incurred through the completion of the rate case.
2. At the customer meeting on September 12, 2019, Mr. David Abbott indicated that he contacted the Utility about a water leak.
  - a. Please provide all documentation recorded by the Utility related to his complaint.
  - b. Please explain how this water leak was fixed.
  - c. Please explain the steps taken by the Utility to address this complaint.
  - d. Does Placid Lakes have the capability to identify a water leak in its system? Please explain your answer.
3. At the customer meeting on September 12, 2019, Mr. Steve Whitworth inquired about the flushing frequency.
  - a. Please provide the flushing frequency.
  - b. Please provide the estimated amount of water used for flushing.
  - c. Please explain why the flushing is necessary.
4. After the customer meeting on September 12, 2019, Ms. Jackie Spears (238 Sheppard Rd. NW – resident) approached staff, in the parking lot, to discuss the quality of service. Please describe the Utility's follow up actions concerning Ms. Spears' complaint.
5. Please refer to Placid Lakes' response to staff's first data request, question 11b. The Utility responded that a separate proposal would not be requested "for the complete system, until such time as the Utility is satisfied with the interim solution. The Utility anticipates requesting the final proposal in a couple of years." Please explain why the Utility has decided to seek a complete inner panel to replace the interim solution control system at this time.

RECEIVED-FPSC  
2019 SEP 30 PM 2:44  
COMMISSION CLERK

Mr. Martin S. Friedman

Page 2

September 30, 2019

6. In Order No. PSC-02-1657-PAA-WU, an average cost of \$25 per meter and \$26 per meter box was established for retirement purposes, which was also utilized in Placid Lakes' last rate proceeding. Why does the Utility believe a retirement cost of 75 percent of the new meter cost is more appropriate in the current proceeding?
7. Please provide a Used and Useful calculation based on the non-traditional method relied on in Placid Lakes' last rate case.

Please file all responses electronically no later than October 14, 2019, at the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office and Electronic Filing Web Form. Should you have any questions, please feel free to contact me at (850) 413-6473 or email me at [mramos@psc.state.fl](mailto:mramos@psc.state.fl).

Sincerely,



Marissa Ramos  
Public Utility Analyst III

cc: Division of Commission Clerk (Docket No. 20190031-WU)  
Martin S. Friedman