

THE WOODS UTILITY COMPANY

November 18, 2019

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 20190125-WS - Application for staff-assisted rate case in Sumter County by The Woods Utility Company – *Response to Staff's Second Data Request*

Dear Commission Clerk:

The Woods Utility Company (The Woods) hereby submits its response to Staff's Second Data Request in the above referenced docket.

1. For The Woods' (Utility) water and wastewater service territories, please provide the following for each:
 - a. The total number of lots in the Utility's service territory. **Response:** 120
 - b. The total number of lots the Utility is currently serving. **Response:** 86
 - c. The total number of vacant lots in the Utility's service territory. **Response:** 34
 - d. The total number of double lots in the Utility's service territory. **Response:** 17
 - e. The total number of lots the Utility is unable to serve, and an explanation as to why this is the case.

Response: There is one lot that has a pond on it that cannot be served. In addition between the main subdivision and the three commercial customers on Hwy 301, there is vacant land that has several homes with private wells and septic tanks.

In the last full rate case (Docket No. 20100330-WS, the Commission approved used and useful in Order No. PSC-12-0102-FOF-WS, issued March 5, 2012 for The Woods water and wastewater system. In this Final Rate Order, the Commission approved the following used and useful:

Water Treatment Plant	100%
Water Distribution System	76%

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Wastewater Treatment Plant	100%
Wastewater Collection System	71%

In rendering the decision, the Final Rate Order stated:

As previously discussed, our policy is to rely on U&U decisions in prior orders when there has been no change in the facilities or operation of a system. We believe that a reduction in demand shall not be relied on to require a new U&U calculation. Performing a new U&U calculation in each rate case and ignoring prior decisions ignores the importance of regulatory certainty and results in costly evaluations, particularly when there has been no change in the facilities or operation of a system.

Eleven of the systems protested by OPC were found to be 100 percent U&U in Docket No. 080121-WS, including Arredondo Farms, Florida Central Commerce Park, Jungle Den, Kings Cove, Morningview, Rosalie Oaks, South Seas, Summit Chase, The Woods, Valencia Terrace, and Venetian Village. With no evidence to support a change in facilities or operation of any of these systems, we find that these systems shall be 100 percent U&U because they are essentially built out with no apparent potential for expansion. In addition, the Fairways and Peace River system, which were not included in AUF's last rate case, shall be considered 100 percent U&U because the service areas appear to be built out with no apparent potential for expansion

The Woods has virtually no growth. There have only been two additional new customers added in the last six (6) years. The service territory continues to be essentially built out. The Woods would further argue that if a service territory is built out then the water distribution and wastewater collection system should likewise be considered 100% used and useful as there is essentially no growth in customers.

In the Final Rate Order referenced above, the Commission stated:

As with WTPs, when systems are not experiencing growth, especially when a system is an older system, it is likely that a built-out condition exists. Finding a system to be 100 percent U&U is appropriate when the system is the minimum size necessary to serve the development or when the system is otherwise built out.

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If you have any questions, please do not hesitate to contact me at (727) 848-8292, ext. 245.

Respectfully,



Troy Rendell
Vice President
Investor Owned Utilities
// for The Woods Utility Company