



Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A.
420 South Orange Avenue, Suite 700
P.O. Box 2346 (ZIP 32802-2346)
Orlando, FL 32801

(407) 841-1200
(407) 423-1831 Fax
www.deanmead.com

Attorneys and Counselors at Law
Orlando
Fort Pierce
Tallahassee
Viera/Melbourne

MARTIN FRIEDMAN
407-310-2077
mfriedman@deanmead.com

September 9, 2020
VIA E-FILING

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

RE: Docket No.: 20200185-WS; Application for original water and wastewater certificates in Lake and Sumter Counties by Gibson Place Utility Company, LLC
Our Matter No.: 073275

Dear Mr. Tietzman:

The following are Gibson Place Utility Company, LLC's responses to the Deficiency Letter dated August 21, 2020.

- Ownership Information.** Rule 25-30.033(1)(e), Florida Administrative Code (F.A.C.), requires that the applicant provide the name(s), address(es), and percent ownership of each entity or person who owns more than a 5 percent interest in the utility. Please provide the addresses of the persons and entities named in the application who own more than a 5 percent interest in GPU.

RESPONSE:

Name	% Ownership	Address
Mark G. Morse	5.9	3619 Kiessel Road The Villages, FL 32163
Jennifer L. Parr	5.9	3619 Kiessel Road The Villages, FL 32163

Tracy M. Dadeo	5.9	3619 Kiessel Road The Villages, FL 32163
Lindsey Blaise as Trustee of the Tracy Morse Dynasty Trust	10	3619 Kiessel Road The Villages, FL 32163
Kelsea Manly as Trustee of the Mark Morse Dynasty Trust	10	3619 Kiessel Road The Villages, FL 32163
Harper Boone and Paige Boone as Co-Trustees of the Jennifer Morse Parr Dynasty Trust	10	3619 Kiessel Road The Villages, FL 32163

2. **Requests for Service.** Rule 25-30.033(1)(k)2., F.A.C., requires that the applicant provide a copy of all requests for service from property owners or developers in areas not currently served. Please provide the required documents.

RESPONSE: There are no written requests for service. The service area is part of The Villages PUD which is being developed by a related party and thus they have not seen it necessary to have a written agreement. This is consistent with several prior proceedings before this Commission.

3. **Proposed Rates and Charges.** Rule 25-30.033(1)(p), F.A.C., requires that the applicant provide the following to support the proposed rates and charges:

1. The existing and projected cost of the system(s) and associated depreciation by year until design capacity is reached using the National Association of Regulatory Utility Commissioners (NARUC) 1996 Uniform System of Accounts (USOA), which is incorporated by reference in Rule 25-30.115, F.A.C. The applicant shall identify the year that 80 percent of design capacity is anticipated. If the utility will be built in phases, this shall apply only to the first phase;
2. The existing and projected annual contributions-in-aid-of-construction (CIAC) and associated amortization by year including a description of assumptions regarding customer growth projections using the same projections used in subparagraph (1)(k)1. above for the proposed service area. The projected CIAC shall identify cash and property contributions and amortization at 100 percent of design capacity and identify the year when 80 percent of design capacity is anticipated. The projected CIAC shall be consistent with the service availability policy and charges in the proposed tariff provided in paragraph (q) below, the schedule provided in subparagraph (1)(p)6. below, and the CIAC guidelines in Rule 25-30.580, F.A.C. If the utility will be built in phases, this shall apply only to the first phase;
3. A schedule showing the projected capital structure including the methods of financing the construction and operation of the utility until the utility reaches 80 percent of the design capacity of the system. If the utility will be built in phases, this shall apply

only to the first phase;

4. The current annual operating expenses and the projected annual operating expenses at 80 percent of design capacity using the NARUC USOA. If the utility will be built in phases, this shall apply only to the first phase;

5. A schedule showing how the proposed rates were developed;

6. A schedule showing how the proposed service availability policy and charges were developed, including meter installation, main extension, and plant capacity charges, and proposed donated property; and,

7. A schedule showing how the customer deposits and miscellaneous service charges were developed, including initial connection, normal reconnection, violation reconnection, and premises visit fees, consistent with Rules 25-30.311 and 25-30.460, F.A.C.

RESPONSE: This information is subject to a Motion to Bifurcate and for Rule Waiver, and will be filed in sufficient time to be evaluated by staff before service has begun.

4. **Tariff.** Rule 25-30.033(1)(q), F.A.C., requires that the applicant provide a tariff containing all rates, classifications, charges, rules, and regulations which shall be consistent with Chapter 25-9, F.A.C. Please provide a tariff as required.

RESPONSE: The Tariff is subject to a Motion to Bifurcate and for Rule Waiver and will be filed in sufficient time to be evaluated by staff before service has begun.

The Deficiency Letter also stated that the filing fee had to be paid by the response deadline. The filing fee has been received by the Commission Clerk. See Document #04057-2020.

Should you have any questions, please do not hesitate to give me a call.

Very truly yours,



MARTIN S. FRIEDMAN
For the Firm

MSF/

cc: Trey Arnett (via e-mail)
Kurt Schrader, Esquire (via e-mail)