

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: July 23, 2021
TO: Dorothy E. Menasco, Office of Commission Clerk
FROM: Kathryn G.W. Cowdery, Senior Attorney, Office of the General Counsel
RE: Docket No. 20220122-WS

Please place the attached documents into Docket No. 20210122-WS.

Please contact me at kcowdery@psc.state.fl.us if you have any questions. Thank you.

KGWC

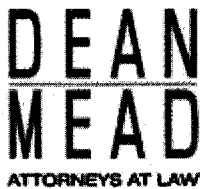
RECEIVED-FPSC
2021 JUL 23 AM 8:30
COMMISSION
CLERK

Kathryn Cowdery

From: Sevini Guffey
Sent: Thursday, July 22, 2021 8:53 AM
To: Kathryn Cowdery
Subject: FW: SERC Data Request to Water & Wastewater Utilities -- Rules 25-30.025, 445, 446, 455, 456, 565, and 4345, F.A.C.
Attachments: SERC Data Request Response (O3318062x9F8AD).docx

From: Martin S. Friedman <MFriedman@deanmead.com>
Sent: Monday, June 14, 2021 5:15 PM
To: Troy Rendell <trendell@uswatercorp.net>; Sevini Guffey <sguffey@psc.state.fl.us>; Mike Smallridge <mike@fus1llc.com>
Cc: Tripp Coston <TCoston@PSC.STATE.FL.US>
Subject: RE: SERC Data Request to Water & Wastewater Utilities -- Rules 25-30.025, 445, 446, 455, 456, 565, and 4345, F.A.C.

UIF's response is attached.



www.deanmead.com

Martin S Friedman
Attorney at Law
MFriedman@deanmead.com

D: 407-310-2077

Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A.
420 S. Orange Avenue, Suite 700, Orlando, FL 32801
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From: Troy Rendell <trendell@uswatercorp.net>
Sent: Monday, June 14, 2021 11:00 AM
To: Sevini Guffey <sguffey@psc.state.fl.us>; Martin S. Friedman <MFriedman@deanmead.com>; Mike Smallridge <mike@fus1llc.com>
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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

See attached responses.

Thanks.

Troy Rendell
Vice President - Investor Owned Utilities



4939 Cross Bayou Boulevard
New Port Richey, FL 34652
(Office) 727-848-8292 x245
(Mobile) 727-777-2508
(Fax) 727-848-7701
(E-Mail) trendell@uswatercorp.net

From: Sevini Guffey <sguffey@psc.state.fl.us>
Sent: Friday, June 11, 2021 1:35 PM
To: 'Martin S. Friedman' <MFriedman@deanmead.com>; 'Troy Rendell' <trendell@uswatercorp.net>; Mike Smallridge <mike@fus1llc.com>
Cc: Tripp Coston <TCoston@PSC.STATE.FL.US>
Subject: SERC Data Request to Water & Wastewater Utilities -- Rules 25-30.025, 445, 446, 455, 456, 565, and 4345, F.A.C.

Dear Mr. Friedman, Mr. Rendell, and Mr. Smallridge:

By this email, the Commission staff is requesting your utility company's input on potential cost savings/impacts that might result from the proposed revisions to Rules 25-30.025, 25-30.445, 25-30.446, 25-30.455, 25-30.456, 25-30.565, and 25-30.345, Florida Administrative Code.

Pursuant to Section 120.54(3)(b)1, Florida Statutes, agencies are encouraged to prepare a statement of estimated regulatory costs (SERC) before the adoption, amendment, or repeal of any rule. In order to prepare the SERC, staff includes questions which pertain to the proposed rule changes, as attached. Most recent draft rules are also attached.

Please provide me your responses by June 25, 2021 and contact me if you have any concerns regarding this data request.

Thank you.
Sevini

Sevini K. Guffey
Public Utility Analyst III
Division of Economics
Florida Public Service Commission
Email: sguffey@psc.state.fl.us
Phone: 850.413.6204

Statement of Estimated Regulatory Costs Data Request to Water and Wastewater Utilities

Rules 25-30.025, 25-30.445, 25-30.446, 25-30.455, 25-30.456, 25-30.565, and

25-30.4345, F.A.C.

Staff has proposed revisions to the above rules for the purpose of streamlining the limited proceeding application process for water and wastewater utilities. Considering the proposed revisions, please respond to the following questions. The most recent draft rules are attached.

Rule 25-30.445, F.A.C. General Information and Instructions Required of Water and Wastewater Utilities in an Application for a Limited Proceeding.

1. Proposed revisions to Sections (2)(c) and (4)(m)2 of Rule 25-30.445, F.A.C., reduces the number of paper copies of a limited proceeding application to be filed with the Commission from seven to three and, will require only an original and one copy of Billing Analysis Schedules instead of two copies. Do you expect any cost savings to your utility with these proposed revisions? If yes, please provide an estimate of the cost savings.

Response: Yes cost savings of approximately \$50 - \$60 per filing.

Rule 25-30.446, F.A.C., Notice of and Public Information for Application for Limited Proceeding Rate Increase.

2. Proposed revisions to Sections (2) and (3) of Rule 25-30.446, F.A.C., require that the notification to the governing body of each municipality and county within the utility's service areas clearly identify the Commission-assigned docket number and state that a copy of the petition and MFRs and application can be accessed on the Commission's website instead of mailing a copy to each municipality in the affected service area. Do you expect any cost savings to your utility with these proposed revisions? If yes, please provide an estimate of the cost savings.

Response: Yes cost savings of approximately \$225 per filing.

Rule 25-30.565, F.A.C., Application for approval of New or Revised Service Availability Policy or Charges.

3. Sections (1), (4)(w), and (5) of Rule 25-30.565, F.A.C., are being revised to require only one original and one copy of the policy or charges instead of one original and six copies, include only one proposed set of tariff sheets, and eliminate the requirement to place copies of the application and exhibits for public inspection at its local office serving the area affected by the charges. Do you expect any cost savings to your utility with these proposed revisions? If yes, please provide an estimate of the cost savings.

4. **Response:** Yes cost savings of approximately \$100 - \$150 per filing.

Rule 25-30.4345, F.A.C., Notice of Requests for New or Revised Service Availability Charges or Policies and Notice of Requests for Allowance for Funds Prudently Invested (AFPI) Charges.

5. Proposed revisions to Rule 25-30.4345(2), F.A.C., delete the requirements to place a copy of applications for service availability charges or policies or an application for AFPI charges at physical locations such as official headquarters, main county, library, local community center, and, instead, require that the notice of application include a statement that the utility's application can be accessed on the Commission's website. Do you expect any cost savings to your utility with these proposed revisions? If yes, please provide an estimate of the cost savings.

Response: Yes cost savings of approximately \$225 per filing.

6. Please discuss any other potential benefits to your utility from the overall proposed revisions to Rules 25-30.025, 25-30.445, 25-30.446, 25-30.455, 25-30.456, 25-30.565, and 25-30.4345, F.A.C., which are designed to streamline the limited proceeding application process for water and wastewater utilities.

Response: N/A

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Response: N/A