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# Public Service Commission

July 19, 2022

Mr. Martin S. Friedman  
Dean Mead Law Firm  
420 S. Orange Ave., Ste. 700  
Orlando, FL 32801  
[mfriedman@deanmead.com](mailto:mfriedman@deanmead.com)

## STAFF'S SECOND DATA REQUEST VIA EMAIL

**Re: Docket No. 20220032-WS – Application for staff-assisted rate case in Polk County by Anglers Cove West, Ltd.**

Dear Mr. Friedman:

By this letter, Commission staff requests that Anglers Cove West, Ltd. (Utility) provide responses to the following questions:

1. Please provide an estimate for rate case expense incurred through the Proposed Agency Action (PAA) process. Please include any estimated attorney's fees that will be incurred after the date of issuance of the Staff Report.
2. Please refer to the staff audit report, pages 12 and 13. The Utility balance for Salaries & Wages – Employees is \$29,117 for water and \$33,828 for wastewater. Please provide a detailed explanation of the duties and responsibilities of the employees. Please include the appropriate documentation and support for the salaries.
3. Please refer to the Utility's response to Staff's First Data Request, No. 5. Please explain the increase in gallons purchased for the December bill (PDF page 29).
4. Please provide the following for the water meter replacement pro forma project:
  - a. Please provide a detailed explanation of the work performed for this project as listed in the Utility's response to Staff's First Data Request, No. 17, Attachment 1.
  - b. Please provide any documentation supporting the original cost for the meters that were replaced.
  - c. Please explain each line item on the Empire Pipe & Supply Bid ID # 5014535 and the work performed.

- d. Please explain the inconsistency in the quantity of meters being replaced on the bid and the number of meters listed on page W-3 in the Utility's 2021 Annual Report. (There are more meters being replaced than denoted in the Annual Report)
  - e. Please explain why in the original application the Utility requested an amount of \$42,176.67 for replacement of 154, 5/8-inch meters and 3, 1-inch meters, but in its response to Staff's First Data Request, No. 17, the cost increased to \$99,836.33 for replacement of ALL meters.
  - f. Please refer to the Utility's response to Staff's First Data Request, No. 17, Attachment 1. Please indicate whether or not this project has been completed. If so, please provide the final invoice. If not, please provide the revised expected completion date.
5. Please refer to the Utility's response to Staff's First Data Request, No. 17. Please explain how the Utility determined that the retention pond required repairs.
- a. Please provide a more detailed explanation of the work performed for the retention pond refurbishment pro forma project. Please provide any supporting documentation for the cost of the various components of the project, i.e., permitting, engineering, and inspection that were not included in Estimate #22-425752 from Corrosion Control.
  - b. Please provide an estimate of the life of the retention pond refurbishment, and identify how often does this work has to be performed.
6. Please refer to the letter dated July 12, 2022, regarding necessary upgrades to the electronic meter reading equipment. Please explain how it was determined that the electronic meter reading equipment required upgrades.
- a. Please provide a more detailed explanation of the work to be performed for the upgrades to the electronic meter reading equipment. As part of this response, please indicate whether equipment will be replaced.
  - b. Please describe how replacing the water meters and upgrading the electronic meter reading equipment will affect the time required to read the meters and collect billing data.

Mr. Martin S. Friedman

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Please file all responses electronically no later than **August 9, 2022**, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20220032-WS). If you have any questions, please contact me by phone at (850) 413-6592 or by email at [tthomps@psc.state.fl.us](mailto:tthomps@psc.state.fl.us).

Sincerely,

*/s/Takira Thompson*

Takira Thompson  
Engineering Specialist

TTT:jp

cc: Office of Commission Clerk (Docket No. 20220032-WS)

Richard Gentry, Office of Public Counsel

Steven Baird, Office of Public Counsel