

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for a Limited Alternative Rate
Increase in Hardee, Manatee, Marion, Polk and Pasco
Counties for Charlie Creek Utilities, LLC, Crestridge Utilities,
LLC, East Marion Utilities, LLC, Heather Hills Utilities, LLC,
Holiday Gardens Utilities, LLC, Lake Yale Utilities, LLC,
McLeod Gardens Utilities, LLC, Orange Land Utilities, LLC.

_Docket # 2022-TBD_WS _____ /

PETITION FOR WAIVER OF
RULE 25-30.020(2)(f), FLORIDA ADMINISTRATIVE CODE

Florida Utility Services (“FUS”) pursuant to Section 120.542, Florida Statutes, hereby petitions the Florida Public Service Commission for a waiver of a requirement of Rule 25-30.020, Florida Administrative Code, as specifically identified below. In support of this Petition, FUS asserts the following:

1. The name and address of the Petitioner is:

Michael Smallridge
5911 Trouble Creek Rd.
New Port Richey, FL 34652
Telephone: (352) 302-7406

2. The name, address and telephone number of the person to contact concerning this

Petition is:

Michael Smallridge
5911 Trouble Creek Rd.
New Port Richey, FL. 34652
352-302-7406
mike@fusllc.com

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COMMISSION
CLERK

3. This Application is for waiver of per utility filing fees which in the case of my LARI filing is \$13,000. This creates a substantial economic hardship for the utility and its customers. As for the utility, the \$13,000 filing fees greatly places a limit on the utilities cash reserves and inhibits my ability to deal with emergencies in a proper manner. Should the utility have to borrow the money additional cost would exist. As for the customers, the excess filing fees will have to be paid back though rate case expense and in some cases with the utilities allowed rate of return. The way this rule reads my customers would be paying the commission to do the work one time and pay 10 times the amount for the work. By filing a LARI for common costs only, commission staff will have to make one calculation and apply that calculation 11 times, as they would do anyway.

In contrast, If I were to file for just one utility, the staff allocation rate of common costs would be approved by the commission and from that point carry forward.

Please keep in mind, the creation of a LARI was to give utilities the ability to make filings that would save time and money, therefore reducing costs to the utility and its customers that have to pay the money back in rate case expense. I feel this type of filing of a LARI for common costs only, is the next natural evolution of the spirit and intent of the LARI filing.

4. Pursuant to Rule 28-104.002(1), Florida Administrative Code, a copy of this Petition is being sent to the Joint Administrative Procedures Committee.

5. Please note that normally the LARI filing of this type, I would have included Leighton Estates Utilities, LLC in Marion County but this utility is currently under a SARC and is not eligible for a LARI filing. The same identical documents have been filed in that Docket.

WHEREFORE, FUS, requests this Commission grant a Waiver of the provision of Rule 25-30.020(2)(f), Florida Administrative Code and determine the appropriate filing fee falls under 25-30.020 (2) (F) (3) “for utilities with existing capacity to serve more than 200 ERC’S, \$1,000.

On behalf of my utilities and its customers,

Mike Smallridge

A handwritten signature in blue ink, appearing to be 'MS', followed by the date '11/2/22' written in the same ink.