#### LAW OFFICES

### Rose, Sundstrom & Bentley, LLP

2548 Blairstone Pines Drive Tallahassee, Florida 32301

Frederick L. Aschauer, Jr. Chris H Bentley, P.A. Robert C. Brannan F. Marshall Deterding John R. Jenkins, P.A. Kyle L. Kemper Steven T. Mindlin, P.A. Chasity H. O'Steen William E. Sundstrom, P.A. Diane D. Tremor, P.A. John L. Wharton

(850) 877-6555 Fax (850) 656-4029 www.rsbattorneys.com CENTRAL FLORIDA OFFICE SANLANDO CENTER 2180 W. STATE ROAD 434, SUITE 2118 LONGWOOD, FLORIDA 32779 (407) 830-6331 FAX (407) 830-8522

REPLY TO CENTRAL FLORIDA OFFICE

Martin S. Friedman, P.A. Christian W. Marcelli Brian J. Street

REPLY TO CENTRAL PLORIDA OFFICE

ROBERT M. C. ROSE (1924-2006)

May 19, 2009

### **E-FILING**

Ann Cole, Commission Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

RE: Docket No. 080249-WS; Labrador Utilities, Inc.'s Application for an Increase in Water and

Wastewater Rates in Pasco County, Florida

Our File No.: 30057.157

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket is Labrador Utilities, Inc.'s Supplemental Response to Staff's First Data Request, Item No. 1, dated March 5, 2009.

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

Very truly yours,

CHRISTIAN W. MARCELLI

For the Firm

CWM/tlc Enclosure

cc: Curtis Mouring, Division of Economic Regulation (w/enclosure) (via e-mail)

Ralph Jaeger, Esquire, Office of General Counsel (w/enclosure) (via e-mail)

Ms. Kirsten Weeks (w/enclosure) (via e-mail)

Patrick C. Flynn, Regional Director (w/enclosure) (via e-mail)

Ms. Deborah Swain (w/enclosure) (via e-mail)

Mr. Frank Seidman (w/enclosure) (via e-mail)

Employee Name	Region Cla	Classified As	Full Yr Employee in 2007?	Full Yr Employee in 2007 at Labrador?	Pro Forma Salary Increase Resulting From?	Increase Attributable	Per TY	Employee for Labrador in 2003?
Bonagura, John	FL/South Ope	perator	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(162) 23 37	1,192	No, business manager position created in 2006
Chard, Ronald	FL Ope	perator	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	3,014 105	-	No, cross connection specialist position created in 2007
Davis, Nevile	FL Ope	perator	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	2,867 100	-	No, part time position created in 2006
Durham, Rick	FL/South Ope	perator	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	933 74	1,179	No, regional VP position created in 2006
Flynn, Patrick	FL Ope	perator	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	151 (80) 77	2.142	V
Franklin, Kennedy	FL Ope	perator	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	3,324 116	2,143	No, replaced Christopher Lanni who was a 2003 employee
Harper, Scott	FL Ope	perator	Yes	Yes	Should not be allocated to Labrador	(30,101)	30,101	
Haws, Scotty	FL/South Ope	perator	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(170) 34 39	1 247	No office and compliance are consistent and in 2007
Hoy, John	FL/South Ope	perator	No	No	No longer in position (Rick Durham replaced)	(699)		No, safety and compliance manager position created in 2006 N/A
Neal, William	FL Ope	perator	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(127) 154 161	4 572	No, replaced Gary Armstrong who was a 2003 employee
Rainey, Shantavious	FL Ope	perator	No	No	No longer in position (Jason Wright replaced)	(23,977)	23,977	
Wilson, Michael	FL/South Ope	perator	Yes	No	Allocating portion of current year salary to TV based on TYE ERCs Cost of living increase	4,257 149	-	No, replaced Garth Armstrong who was a 2003 employee

Worrell, David	FL	Operator	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	3,312 116	- No, new operator position created in 2008
							- 100, new operator position created in 2006
Wright, Jason	FL	Operator	No	No	Annualization for full year current salary allocated at TYE ERCs	42,897	
					Cost of living increase	1,501	
							- No, was a replacement to Shantavious Rainey
Leadership Ops	FL	Operator	N/A	N/A	Included in officers	(1,660)	
1 1		•					1,660 N/A
T-t-l Oti						6.469	72 227 (time to total annual description)
Total Operations						6,468	66,770 73,237 (ties to total requested operator salaries)

Employee Name	Region	Classified As	Full Yr Employed in 2007?	Full Yr Employee in 2007 at Labrador?	Pro Forma Salary Increase Resulting From?	Increase Attributable	Per TY	ployee for Labrador in 2003?
Abbott, Loretta	FL/South	Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(77) 31 17		
							544 Yes	
Baranska, Debora	FL/South	Office	Yes	Yes	No longer in position (Leanne Loeffel replaced)	(462)	462 Yes	
Bennett, Kimberly	FL/South	Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary	(86) (5)		
					Cost of living increase	18	606 Yes	
Borges, Robert	FL/South	Office	Yes	No	Position terminated	(389)	389 N/A	
Ceballos, Isabel	FL/South	Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary	(81) (1)		
					Cost of living increase	17	569 No, replace	d Sarah Gentilucci who was a 2003 employee
Chandler, Matthew	FL/South	Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(73) 33 17		
					Cost of Itving Increase	1,	513 Yes	
Christian, Elise	FL/South	Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(129) 32 28		
							908 Yes	
Copley, Wanda	FL/South	Office	Yes	No	No longer in position (Susan Dipasquale replaced)	(452)	452 N/A	
Dipasquale, Susan	FL/South	Office	No	Yes	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	156 16		
							299 No, was a r	eplacement to Wanda Copley
Hanks, Peggy	FL/South	Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	439 15		
							- No, was a r	eplacement to Jackie Tappan

Mayeski, Lorie	FL/South Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	568 20	- No, new position created in 2008
Loeffel, Leanne	FL/South Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	568 20	- No, replaced Debora Baranska who was a 2003 employee
Noell, Sandra	FL/South Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(70) 29 16	493 Yes
Patricio, Rheginald	FL/South Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	474 17	- No, new position created in 2008
Paulk, Stella	FL/South Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(93) 31 21	653 Yes
Raponi, Ann	FL/South Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(84) 18 18	589 Yes
Ratliff, Josephine	FL/South Office	Yes	Yes	Position terminated	(499)	499 Yes
Sasic, Karen	FL/South Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(155) (26) 32	1,091 Yes
Sillitoe, Jacqueline	FL/South Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(78) (36) 15	552 No, replaced Kathleen Kinsley who was a 2003 employee
Trovinger, Ferrellyn	FL/South Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(89) 27 20	627 Yes
Other	FL/South Office	N/A	N/A	Accruals/accounting entries	(198)	198 N/A
Other	FL/South Office	N/A	N/A	Unreconcilable difference	(14)	14
Total Regional Office				<u> </u>	(384)	9,455 9,071 (ties to total requested FL office salaries)

Employee Name	Region Classified A	Full Yr Employ in 2007?	ree Full Yr Employee in 2007 at TV?	<u>Pro Forma Salary</u> <u>Increase Resulting From?</u>	Increase Attributable	<u>Employee for Labrador</u> <u>Per TY</u> <u>in 2003?</u>
Arnoux, Diane	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(19) (38) 10	344 Yes
Barrett, Jason	Corporate Office	Yes	Yes	Should not be allocated to Labrador	(253)	253 N/A
Bartusch, Lee	Corporate Office	No	No	Position terminated	(144)	144 N/A
Bell, William	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	32 16	416 No, corporate operations director position created in 2007
Campuzano, Linda	Corporate Office	Yes	Yes	No longer in position (Agnes Chlebowicz replaced)	(178)	178 N/A
Carrie, Dennis	Corporate Office	Yes	Yes	No longer in position	(503)	503 N/A
Casados Jr, Jimmy	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(31) 49 20	550 Yes, but was transferred to billing and corporate customer service manager position created in 2008
Chang, Tae	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	146 5	- No, was a replacement to Ellisa Gallis
Chlebowicz, Agnes	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	191 7	- No, was a replacement to Linda Campuzano
Constable, Alissa	Corporate Office	No	No	No longer in position (Stacy Krugman replaced)	(42)	42 N/A
Crossett, Lisa	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(61) 81 20	1,099 Yes
Dann, Brian	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	276 10	- No, replaced Karen Gingery who was a 2003 employee
Dave, Hardik	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	192 8	44 No, replaced Erica Berlet Gamauf who was a 2003 employee

Delgado, Daniel	Corporate Office	Yes	Yes	No longer in position (Ron Kazlo replaced)	(864)	864 Yes
Di Marca, Michelle	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	328 13	34 No, replaced Michelle Cohn who was a 2003 employee
Dryjanski, Michael	Corporate Office	Yes	Yes	Should not be allocated to Labrador	(503)	503 N/A
Duggan, Michael	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	270 9	- No, replaced Chris Kocan who was a 2003 employee
Federico, Antoinette	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(16) 36 11	289 No, accounts payable manager position created in 2006
Friedman, Avelina	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(17) 35 11	
Gallis, Ellisa	Corporate Office	No	No	No longer in position (Tae Chang replaced)	(31)	303 Yes 31
Georgiev, Lena	Corporate Office	Yes	Yes	Should not be allocated to Labrador	(381)	381 N/A
Gomez, Samuel	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(11) 23 7	100 V
Granite, Deborah	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(17) 9 10	198 Yes
Guidice, Joyce	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(16) 18 10	301 No, new billing specialist position created in 2006  294 Yes
Harrell, Janice	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(10) 40 7	
Harris, Khalifat	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(18) 37 12	177 No, new A/P clerk position created in 2004
Haynes Jr, John	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	676 24	<ul> <li>No, capital projects accountant position created in 2006</li> <li>Yes</li> </ul>

Hopkins, John	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(19) 157 17	349 No, replaced Justine Silvey who was a 2003 employee
Hoy, John	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	142 36	894 No, replaced Steve Lubertozzi (transferred to CFO position)
Kazlo, Allen	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	676 24	- No, replaced Daniel Delgado who was a 2003 employee
Kim, Christine	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(27) 39 17	482 No, accounting manager position created in 2006
Krugler, Adrienne	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(19) 28 13	350 Yes
Krugman, Stacy	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	160 13	204 No, was a replacement to Alissa Constable
Lau, Alice	Corporate Office	Yes	Yes	No longer in position (Elizabeth Triggiani replaced)	(260)	260 N/A
Lawrence, Brent	Corporate Office	No	No	Position terminated	(93)	93 N/A
Lingeman, Samuel	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	248 11	52 No, was a replacement to Joseph Mischik
Lubertozzi, Steven	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(57) 59 36	1,034 Yes, but was a replacement to Lawrence Schumacher (transferred to CEO position)
Luppino, Nancy	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(15) 14 10	274 Yes

Luppino, Phyllis	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(14) 35 9	246 Yes
Martinov, Slobodan	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	270 9	- No, fixed asset accountant position created in 2007
Marzouk, Michelle	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(188) 111 6	246 No, accounting and regulatory administrative assistant position created in 2006
Matthews, Mary	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(18) 19 12	328 Yes
McGrain, Pamela	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(16) 27 10	280 Yes
McLean, Pamela	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	153 10	141 No, payroll manager position created in 2006
Melchiorre, Barbara	Corporate Office	No	No	No longer in position (Lawanda Valrie replaced)	(16)	16 N/A
Miranda, Margarita	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(13) 17 8	235 No, A/P clerk position created in 2006
Muema, Ruth	Corporate Office	No	No	Position terminated	(50)	50 N/A
Ostler, Tom	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	595 21	- No, hired into IT manager position (Jim Casados's previous position)
Mischik, Joseph	Corporate Office	Yes	Yes	No longer in position (Sam Lingeman replaced)	(292)	292 N/A
Murphy, John	Corporate Office	No	No	No longer in position (Slobodan Martinov replaced)	(312)	312 N/A
Neyzelman, Dimitry	Corporate Office	Yes	Yes	Should not be allocated to Labrador	(377)	377 N/A

Pannos, Nicholas	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(12) 23 8	216 No, IT specialist position created in 2006
Paule, Nancy	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(8) 54 7	144 Yes
Pietras, Victoria	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	325 11	- No, replaced Igor Turov who was a 2003 employee
Povich, Erin	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(15) 544 28	272 No, replaced Kirsten Weeks (who was promoted to manager for regulatory)
Rochow, Michelle	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(17) 584 30	300 No, regulatory accountant position created in 2006
Rose, Kendra	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	229 13	137 No, safety coordinator position created in 2007
Scherer, William	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	408 14	- No, tax accountant position created in 2008
Schiopu, Mircea	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(11) 15 7	196 Yes
Schumacher, Lawrence	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(105) 108 66	1,886 Yes
Serrill III, George	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(23) 31 15	409 No, replaced Brad Bernardi who was a 2003 employee
Shrake, Brian	Corporate Office	No	No	Should not be allocated to Labrador	(173)	173

Siegel, Trisha	Corporate Office	No	No	Position terminated	(20)	20 N/A
Silvey, Justine	Corporate Office	Yes	Yes	No longer in position (John Hopkins replaced)	(412)	412 Yes
Simmons, Rodney	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	171 12	166 No, office specialist position created in 2007
Smutny Jr., Thomas	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(10) 167 12	173 No, systems specialist position created in 2005
Sowell, George	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	392 14	- No, new accounting manager position created in 2008
Stoica, Monica	Corporate Office	Yes	Yes	No longer in position	(333)	333 N/A
Stone, Leslie	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	128 12	217 No, replaced Sue Aylin who was a 2003 employee
Stover, John	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(60) 100 39	1,080 No, corporate council position created in 2007
Sudduth, Donald	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(48) 50 30	868 No, business director position created in 2006
Tabang, Liliana Popa	Corporate Office	No	No	Position terminated	(3)	3 N/A
Triggiani, Elizabeth	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	216 8	- No, was a replacement to John Hopkins (promoted to HR manager)
Valrie, Lawanda	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	143 6	19 No, was a replacement to Barb Melchiorre
Ward, Inger	Corporate Office	No	No	No longer in position	(47)	47 N/A
Weeks, Kirsten	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(24) 813 43	441 Yes

Williams, John	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(12) 344 19	220 No, director of governmental affairs position created in 2006
Yap, Lowell	Corporate Office	Yes	Yes	Should not be allocated to Labrador	(220)	220 N/A
Yount, Darrin	Corporate Office	Yes	Yes	Adjusting to TYE ERCs Adjusting to current salary Cost of living increase	(30) 58 20	549 No, director of strategic planning position created in 2006
Yount, Sherri	Corporate Office	Yes	Yes	No longer in position	(22)	22 N/A
Zawacki, Maureen	Corporate Office	Yes	Yes	Position terminated	(187)	187 N/A
Zawadzki, Diane	Corporate Office	No	No	Annualization for full year current salary allocated at TYE ERCs Cost of living increase	82 13	297 No, operation's analyst position created in 2007
Other	Corporate Office	N/A	N/A	Unreconcilable difference	1,058	(1,058)
Total Corporate Office					5,398	21,729 27,128 ties to total requested corporate office salaries
Total - All Salaries					11,482	97,954 109,436

	<u>2003</u>	<u>2007</u>	<b>Difference</b>	<u>Percentage</u>	
Operator Salary Expense	41,074	73,237	32,163	78.31%	(1)(3)
Capitalized Time	(35,515)	(6,012)	29,503	-83.07%	(2)
<b>Total Operator Expense</b>	5,559	67,225	61,666		
	2003	<u>2007</u>	<u>Difference</u>	Percentage	
Florida Office Expense	12,856	9,071	(3,785)	-29.44%	(4)
	2003	<u>2007</u>	<u>Difference</u>	<u>Percentage</u>	
Corporate Office Expense	14,781	27,128	12,347	83.54%	(5)

- (1) Actual operator salaries for Labrador increased by 78.31% over four years. This increase is attributable to several reasons. First, the Company gives a standard cost of living increase to its employees on an annual basis. Second, the adjustment in 2007 has been annualized to account for full year salaries of all personnel allocated to Labrador. The last rate case, Docket No. 030443-WS, included only actual salaries, not annualized salaries. Annualizing is a normal practice in determining revenues and expenses for a full test year. Third, between 2003 and 2007, six new positions were created within the Company, including a regional vice president serving the Florida and South regions, a business manager serving the same, and a cross connection specialist, an operator, and a part-time operator, all of whom are allocated to various Florida companies. The new employees alone account for \$13,940 of the difference between 2003 and 2007. A current annual operator expense of \$73,237 is not unreasonable to efficiently run both a water and wastewater system consisting of over 1,567 ERCs in total. In fact, if Labrador were a stand-alone system, it would be difficult to run it efficiently and effectively for a little over \$73,000. Labrador benefits by being among a group of well-run systems in Florida.
- (2) One of the reasons that net salaries appeared as low as they were in 2003 is due to capitalized time. As evidenced above, Labrador had a heightened amount of capitalized time in 2003, due to the fact that the system was dilapidated at purchase. There were several capital projects put into place shortly after purchase, causing capitalized time to be unusually high. High capitalized time causes net salary expense to be reduced, and is not representative of the actual salary cost to run the system.
- (3) Regarding the part-time operator, this position was created in order to assist the field operator and to provide support for the water and wastewater systems. This position parallels a part-time position in 2003, held by Justin Weber. Cross connection is a mandated DEP rule; the new cross connection specialist position reflects the requirements of this rule. The necessity of weekend checks, also mandated by the DEP in order to maintain Labrador's operating permit fulfilled the need for another full time operator. All the positions currently held at Labrador help maintain the integrity and the efficient operating status of the plant. The company also notes that during its last rate case, customers had requested additional measures by the Company in order to uphold, continue, and improve the water and wastewater facilities. Finally, the Company created a regional vice president position, as well as a business manager and safety and compliance manager position. Prior to the creation of the RVP, field operations staff all reported to the RD, who in turn reported directly to the chief operating officer in Northbrook, who had direct responsibility for operations in 17 states. The customer service staff reported through a different chain of command. The size of operations in Florida, the wide area of responsibility for the COO, and the greater demands on the operating staff dictated the need for a leadership position with primary focus on the Florida region. The RVP position was created, and all Florida operations were consolidated into one functional area within the individual located in the regional office to direct and manage the increased demands at the local level. The business manager position was also created to assist the RVP in making strategic decisions for the respective region. Please note that the RVP and business manager position for Florida oversee both the Florida and South regions of the Company. The RVP and business manager duties include:
  - developing a strategic plan for the region which entails looking out long term at the supply, resources, and demand conditions and formulating plans to meet those needs
  - establishing annual and long term goals and measures to focus operations on meeting the balanced needs of customers, regulators, shareholders, and employees
  - establishing annual capital plans and operating budgets to improve the cost effectiveness of operations
  - developing the business case and securing the resources from the parent company to meet the regional needs of the Florida and South regions
  - bringing together field operations and customer service and providing the tools to improve the level of service to the customer
  - providing additional resources and focus to regulatory compliance and safety within the organization

The safety and compliance manager position was created to stay abreast of and ensure compliance with the increasing local, state, and federal regulations governing the delivery of safe and reliable water, treatment and disposal of wastewater, and reuse in both the Florida and South regions. The Company owns and manages over 400 water and wastewater facilities, well sites, and lift stations in the state. In addition, the position is responsible for employee safety and training. Given the level of responsibility and the importance of the duties, the safety and compliance manager reports directly to the RVP. Specific duties include:

- developing and implementing new processes to ensure compliance with all regulations impacting company operations
- staying abreast of all new regulations to determine the impact on the Company and developing plans to meet new or revised requirements
- monitoring all monthly tests and reports
- coordinating the development and distribution of the annual CCR reports and any customer notifications regarding water quality
- developing and implementing a cross connections control program state-wide
- serving as the primary point of contact for the regulatory agencies responsible for compliance and following up on any issues to ensure timely completion and closure
- performing local safety inspections and training
- providing reports to senior management to demonstrate compliance with company policies and environmental regulations
- (4) The Company has been able to reduce its Florida office expense over the past four years due to more efficient practices and the combining of some positions. Also, the Florida office now performs many duties for the South region, as the office in Louisiana has closed. Therefore, certain regional costs, including Florida office salaries, are now allocated to the South region as well.
- (5) Corporate office salaries have increased by 83% in four years. However, there have been several needs of the Company that have required this increase. Generally speaking, Utilities, Inc. was in a growth period between 2003 and 2007. Total revenues in 2007 were \$107,492,665. Compared to 2003 total revenues of \$78,242,046, that's growth of over \$29,250,000 in four years. In addition, the Corporate office was understaffed for a number of years, and due to the growth in the Company, the 2003 through 2007 time period was a good time to increase staffing to an adequate level to keep the corporate level of the business running smoothly. It is important to note that while several new positions were created, the Company also terminated some positions, determining that these positions were not required for the Company to run its business in an effective manner. The new positions created include:
  - Corporate operations director reports to the COO, manages projects in the corporate office, and ensures
    that the maintenance in the corporate office is done, as well as making sure the office meets building code
    requirements, etc.
  - Corporate customer service and billing manager manages all billing in the new CC&B system, performs refunds, tracks A/R
  - A/P manager with the increase in revenue comes increased expenses, an A/P manager was needed to
    oversee the A/P clerks and to ensure timely paying of bills, etc.
  - Billing specialist due to the increased customers, a second billing specialist was required to make rate changes, track customer billings, bill customers, etc.
  - A/P clerks increased Company expenses and growth required more A/P clerks to ensure that bills are paid on time
  - Capital projects accountant position created to track capital projects, assist with budgeting; works directly
    with RDs, RVPs, business managers, and safety and compliance managers
  - Accounting managers the Company's structure in accounting did not have a manager to oversee month end closings, accruals, various entries, etc; part of a new reporting structure in accounting
  - Fixed asset accountants hired to track assets in the new accounting system, ensure correct depreciation rates, perform retirement and depreciation entries
  - Accounting and regulatory administrative assistant assists these two departments with pulling invoices, photocopying, calling vendors, and other various duties upon request
  - Payroll manager with the increase in employees, the need for a payroll manager surfaced  $\,$
  - IT specialist as the Company's headcount increased, an additional IT specialist was needed to address related issues
  - Safety coordinator works directly with safety and compliance coordinators in the field to ensure regulatory requirements, necessary tariff changes, etc.
  - Tax accountant specialized position created in order to help with tax returns, annual reports, deferred tax entries, and other accounting needs related to tax
  - Systems specialist created to assist with specific IT systems needs, specifically Microsoft packages
  - Corporate counsel created to help with general legal issues of a growing company and to work with attorneys in the states in which the Company operates. Also leads any lawsuits or legal issues the Company may have at any given point in time
  - Business development director specifically in charge of seeking out acquisitions and divestments
  - Director of governmental affairs part of the regulatory department, helps with relations with Commissions, consumer advocates, customers, and other Company employees; keeps up on rules and regulations affecting rate cases
  - Director of strategic planning helps with streamlining expenses in operations, assists with budgeting and operations management
  - Operations analyst assists with overall operations management

# LABRADOR UTILITIES, INC. DOCKET NO. 080249-WS ADDITIONAL SALARY INFORMATION FOR AGENDA INCREASE SUBTOTALS AND COMPARISONS

Total

<u>Comparing 2007 to 2003</u>		Amount in \$61,666	<u>Percentage</u>	
Operators - net salary increase  New positions created (includes any annualization or cost of living increase for	61,666			
employees added since 2003) Cost of living increase over four years for employees existing in both 2003 and		13,940	22.61%	
2007 Change in salary and cost of living increase for employees that replaced		196	0.32%	
employees existing in 2003 Employees with the Company in 2003 but not with the Company in 2007		24,151	39.16%	
(either not replaced or replaced internally) Decrease in capitalized time from 2003 to 2007 (results in increase in salary expense - see footnote 2 from "Summary Explanations for explanation of		(6,125)	-9.93%	
change in captime)		29,503	47.84%	
Total		61,666	100.00%	
2007 Pro Forma Increase Subtotals		Amount in \$11 023		Percentage
2007 FTO FORMA INCREASE SUBIOLAIS		Amount in \$11,023		rercentage
Total increase requested in salaries over per books amount	11,023			
Adjusting to TYE ERCs				
Operators		(307)		
Regional Office		(1,016)		
Corporate		(977)	(2.300)	-20.87%
			(2,300)	-20.87%
Adjusting to current salary/annualization for full year for allocated employees Operators		60,736		
Regional Office		2,339		
Corporate		10,136		
			73,210	664.13%
Cost of living increase		2.477		
Operators Regional Office		2,477 307		
Corporate		899		
Corporate		677	3,682	33.40%
Terminated positions/no longer in position			- ,	
Operators		(24,676)		
Regional Office		(1,801)		
Corporate		(3,810)	(20.297)	274.750/
Should not be allocated			(30,287)	-274.75%
Operators		(30,101)		
Regional Office		-		
Corporate		(1,907)		
			(32,008)	-290.36%
Accruals/adjustments		4 440		
Operators		(1,660)		
Regional Office		(212)		
Corporate		1,058	(815)	-7.39%
			()	
Increase in capitalized time due to salary increases			(459)	-4.16%

11,023

100.00%