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MARSHALL WILLIS, DIRECTOR
DIVISION OF ECONOMIC REGULATION
(850) 413-6900

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Public Service Commission

May 16, 2012

STAFF'S SIXTH DATA REQUEST

Mr. Martin S. Friedman
Sundstrom, Friedman & Fumero, LLP
766 North Sun Drive, Suite 4030
Lake Mary, Florida 32746

Re: Docket No. 110200-WU – In re: Application for increase in water rates in Franklin County by Water Management Services, Inc.

Dear Mr. Friedman:

Staff needs the following information to complete its review of the application filed by Water Management Services, Inc. (WMSI or Utility).

Items 1-6 relate to an invoice from Radey, Thomas, Yon & Clark, to WMSI, dated March 7, 2012, produced in response to OPC POD No. 40. That particular invoice indicates that the total balance due was approximately \$146,400 for services billed during the last rate case, Docket No. 100104-WU.

1. Does WMSI dispute this amount or any part of it? If so, what portion does it dispute and on what basis?
2. Has WMSI paid any portion of the approximately \$146,400 figure? If so, please provide proof of any payments.
3. If WMSI has not made any payments to Radey, Thomas, Yon and Clark for legal services rendered in Docket No. 100104-WU, what, if any, arrangements have been made for payment?
4. Has Radey, Thomas, Yon & Clark taken any legal action to collect this debt? If yes, describe the action taken, and WMSI's response.

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5. As of the date of this request, does Radey, Thomas, Yon & Clark have a lien or judgment against WMSI or Gene Brown for legal services rendered during Docket No. 100104-WU? If so, please provide a copy of the lien or judgment.
6. How much has WMSI paid Radey, Thomas, Yon & Clark for legal services rendered in Docket No. 100104-WU?
7. As of the date of this request, please state the payments WMSI has made to the following Consultants for services rendered to WMSI during Docket No. 100104-WU, and provide supporting documentation and proof of payments.

<u>Consultants</u>	<u>Commission Approved Amount</u>
M&R Consultants, Inc. - Frank Seidman	\$65,428
Post, Buckley, Schuh, & Jernigen, Inc. -- Scibelli	\$2,879
Barbara Withers	<u>\$2,700</u>
Total	<u>\$71,007</u>

8. As of the date of this request, do any of the Consultants named in Question 7 have a lien or judgment against WMSI or Gene Brown for unpaid services related to fees for Docket No. 100104-WU? If so, please provide a copy of the lien or judgment.
9. By Order No. PSC-11-0010-SC-WU, issued January 3, 2011, on pages 50 and 64, the Commission required WMSI to provide proof by April 4, 2011 (90 days from the date of the Order), that the adjustments for all the applicable NARUC USOA primary accounts were made. In its response to Staff's First Data Request, Item 17, issued December 12, 2011, WMSI stated that it believed that all the adjustments made would be shown in the MFRs, filed by the Utility on November 7, 2011. After reviewing the Utility's MFRs, staff has concluded that the MFRs did not provide proof that the adjustments have been made. As of the date of this request, no proof of Commission-ordered adjustments has been received by staff. Please provide proof that the adjustments for all the applicable NARUC USOA primary accounts have been made. In this response, please include all journal entries made to adjust the Utility's general ledger for the Commission-ordered adjustments.

Mr. Martin S. Friedman
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Please submit the above information to the Office of Commission Clerk by May 30, 2012. If you have any questions, please contact Todd Brown by phone at (850) 413-6550 or by e-mail at tbrown@psc.state.fl.us.

Sincerely,



Todd M. Brown
Regulatory Analyst IV

cc: Division of Economic Regulation (Maurey, Fletcher, Beeler, Cicchetti, Springer, Daniel, Reiger, King, Stallcup)
Office of the General Counsel (Barrera, Jaeger)
Office of Commission Clerk (Docket No. 110200-WU)
Office of Public Counsel