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# Public Service Commission

April 22, 2014

Gary Deremer  
LP Waterworks, Inc.  
5320 Captains Court  
New Port Richey, FL 34652

## STAFF'S THIRD DATA REQUEST

RE: Docket No. 130153-WS- Application for staff-assisted rate case in Highlands County, by L.P. Utilities Corporation c/o LP Waterworks, Inc.

Dear Mr. Deremer

By this letter, the Commission staff requests that LP Waterworks, Inc. (LPW), provide responses to the following data requests.

1. Questions 1 and 2 are follow-up questions related to LPW's Response to Staff's First Data Request, item number 5, dated January 27, 2014 (FPSC Document No. 00427-14). The Company's Response included a summary sheet titled "FGUA Benchmarking Results," showing Customer Service Cost and O&M Cost (\$/account) for FGUA South systems.
  - a. For comparative purposes, how do the Customer Service Cost and O&M Cost (\$/account) for Florida Government Utility Authority (FGUA) South systems compare to the same metrics for private systems U.S. Water serves under contract? Please include in your response an explanation why the average Customer Service Cost and O&M Cost (\$/account) for FGUA South systems are lower than U.S. Water's contract with LPW.
  - b. If known, please state which FGUA South systems were identified to determine the \$50.58 average Customer Service Cost per account and the \$213 average O&M Cost per account.
  - c. Is there an FGUA South system that serves approximately the same number of customers as LPW? If so, how does the U.S. Water Agreement For Service contract for that FGUA South system compare to LPW's U.S. Water Agreement For Service contract?
  - d. Please identify all specific services that are included in LPW's U.S. Water Agreement For Service contract that are included under the FGUA South contract.
  - e. Please identify all specific services that are not included in LPW's U.S. Water Agreement For Service contract that are included under the FGUA South contract.

- f. If the response to sub-part (c) above is affirmative, please provide a copy of the U.S. Water Agreement For Service contract for that company.
2. The Company's Response included a summary sheet titled "FGUA Benchmarking Results," showing Customer Service Cost and O&M Cost (\$/account) for FGUA West systems.
  - a. For comparative purposes, how do the Customer Service Cost and O&M Cost (\$/account) for Florida Government Utility Authority (FGUA) West systems compare to the same metrics for private systems U.S. Water serves under contract? Please include in your response an explanation why the average Customer Service Cost and O&M Cost (\$/account) for FGUA West systems are lower than U.S. Water's contract with LPW.
  - b. If known, please state which FGUA West systems were identified to determine the \$38.51 average Customer Service Cost per account and the \$225 average O&M Cost per account.
  - c. Is there an FGUA West system that serves approximately the same number of customers as LPW? If so, how does the U.S. Water Agreement For Service contract for that FGUA West system compare to LPW's U.S. Water Agreement For Service contract?
  - d. Please identify all specific services that are included in LPW's U.S. Water Agreement For Service contract that are included under the FGUA West contract.
  - e. Please identify all specific services that are not included in LPW's U.S. Water Agreement For Service contract that are included under the FGUA West contract.
  - f. If the response to sub-part (c) above is affirmative, please provide a copy of the U.S. Water Agreement For Service contract for that company.
3. Questions 3 and 4 are follow-up questions related to information provided in an email from Troy Rendell, dated April 16, 2014. The attachment to the email included a spreadsheet listing planned repairs or improvements (a/k/a pro forma) by year, and this question pertains to the column identified as 2013.
  - a. For 2013, a \$1,138 water project is shown on this document. Please identify any cost savings that will result from completing this project.
  - b. For 2013, a \$559 wastewater project is shown on this document. Please identify any cost savings that will result from completing this project.
  - c. For 2013, a \$981 wastewater project is shown on this document. Please identify any cost savings that will result from completing this project.
  - d. For 2013, a \$18,477 wastewater project is shown on this document. Please identify any cost savings that will result from completing this project.

4. The attachment to the email included a spreadsheet listing planned repairs or improvements (a/k/a pro forma) by year, and this question pertains to the column identified as 2014.
  - a. For 2014, a \$3,800 water project is shown on this document. Please identify any cost savings that will result from completing this project.
  - b. For 2014, a \$6,000 water project is shown on this document. Please identify any cost savings that will result from completing this project.
  - c. For 2014, the first of two \$2,873 water projects is shown on this document. Please identify any cost savings that will result from completing this project.
  - d. For 2014, a \$10,000 project is shown on this document. Please identify any cost savings that will result from completing this project.
  - e. For 2014, the second \$2,873 water project is shown on this document. Please identify any cost savings that will result from completing this project.
  - f. For 2014, a \$8,560 meter replacement project is shown on this document. Please identify any cost savings that will result from completing this project.
  - g. For 2014, a \$2,500 water project is shown on this document. Please identify any cost savings that will result from completing this project.
  - h. For 2014, a \$7,000 wastewater repair project is shown on this document. Please identify any cost savings that will result from completing this project.
  - i. For 2014, a \$7,600 wastewater project is shown on this document. Please identify any cost savings that will result from completing this project.
  - j. For 2014, a \$1,300 wastewater project is shown on this document. Please identify any cost savings that will result from completing this project.
  - k. For 2014, a \$10,000 wastewater project is shown on this document. Please identify any cost savings that will result from completing this project.
  - l. For 2014, a \$7,000 project is shown on this document. Please identify any cost savings that will result from completing this project.

Please file the original and five copies of the requested information by May 2, 2014, with Ms. Carlotta Stauffer, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6191 if you have any questions.

Respectfully,



Charles W. Murphy  
Senior Attorney

CWM/dml

cc: Office of Commission Clerk