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## Public Service Commission

November 17, 2014

Mr. Martin S. Friedman, Esquire  
766 North Sun Drive, Suite 4030  
Lake Mary, Florida 32746  
mfriedman@sfllaw.com

**STAFF'S SECOND DATA REQUEST**  
*via e-mail*

**Re: Docket No. 140135-WS - Application for increase in water/wastewater rates in Pasco County by Labrador Utilities, Inc.**

Dear Mr. Friedman:

By this letter, the Commission staff requests that Labrador Utilities, Inc. (Labrador) provide responses to the following data requests.

**For the following requests, please refer to MFR Schedule B-5, lines 1-26.**

1. According to MFR Schedule B-5, the following operations and maintenance (O&M) water test year expenses increased substantially in the months indicated below compared to other months. Please explain the increase and provide an itemized breakdown of the costs for each month. For Purchased Power, Engineering Contractual Services, and Other Contractual Services, please provide all the invoices for each month.
  - a. The \$6,288 amount shown in August 2013 for Salaries and Wages for Employees, Acct. No. 601.
  - b. The \$548 negative amount shown in December 2013 for Salaries and Wages for Officers, Acct. No. 603.
  - c. The \$1,427 amount shown in November 2013 for Employee Pensions and Benefits, Acct. No. 604.
  - d. The \$1,021 amount shown in October 2013 for Purchased Power, Acct. No. 615.
  - e. The \$2,014 amount shown in April 2013 for Materials and Supplies, Acct. No. 620.
  - f. The \$3,833 amount shown in August 2013 for Engineering Contractual Services, Acct. No. 631.
  - g. The \$7,705 amount shown in August 2013 for Other Contractual Services, Acct. No. 636.

**For the following requests, please refer to Schedule B-6, lines 1-18.**

2. According to MFR Schedule B-6, the following O&M wastewater test year expenses increased substantially in the months indicated below compared to other months. Please explain the increase and provide an itemized breakdown of the cost for each month. For Chemicals, Other Contractual Services, and Transportation, please provide all invoices for each month.
  - a. The \$6,217 amount shown in August 2013 for Salaries and Wages for Employees, Acct. No. 701.
  - b. The \$4,239 amount shown in March 2013 for Chemicals, Acct. No. 718.
  - c. The \$7,577, \$2,915 and the \$3,073 amounts shown for August 2013, October 2013 and November 2013, respectively, for Other Contractual Services, Acct. No. 736.
  - d. The \$1,347 amount shown in January 2013 for Transportation, Acct. No. 750.

**For the following requests, please refer to MFR Schedule B-11, lines 4-6.**

3. Please provide a copy of all the invoices for the \$54,260 deferred Tank Maintenance project costs for August 2006 through July 2011.
4. Did the Company perform the water tank maintenance that it received funding for in Order No. PSC-12-0206-PAA-WS? If the maintenance was not performed, please explain the delay and state when the Company expects to complete the maintenance.
5. Please explain how the deferred water tank maintenance in the amount of \$54,260 for August 2006 to July 2011 differs from the \$30,138-amount approved by the Commission in Labrador's last rate case, Docket No. 110264-WS, Order No. PSC-12-0206-PAA-WS.
6. Has the Company performed any additional water tank maintenance since July 2011? If so, please provide invoices for all Water Tank Maintenance expenses from August 2011 to date. If not, why not?
7. Please provide a copy of all the invoices for the five-year permit costs of \$6,900 for the period of March 2010 to February 2015.
8. Please describe what is involved in the Tank Main and Rep Swr cost of \$10,035 for the period July 2012 through June 2017, and explain why those costs are amortized over 20 years instead of five years. Also, please provide a copy of all the invoices for this project.

Docket No. 140135-WS  
Staff's Second Data Request  
November 17, 2014

**For the following request, please refer to MFR Schedule B-12, Pages 1-13, lines 1-56.**

9. Please provide a copy of the organizational charts and cost allocation manuals for Utilities, Inc., and any of its subsidiaries, that identifies each of the companies for which costs are allocated to and from Labrador, and the methodologies used to allocate those costs.

Please file the original and five copies of the requested information by Monday, December 15, 2014, with Carlotta Stauffer, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6230 if you have any questions.

Sincerely,

*/s/Kyשה Mapp*

Kyשה Mapp  
Attorney

KRM/as

cc: Office of Commission Clerk  
Office of Public Counsel (Kelly, Reilly)