



February 13, 2015

E-FILING

Carlotta S. Stauffer, Director
Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Docket No. 140135-WS; Application for increase in water and wastewater rates in Pasco
County by Labrador Utilities, Inc.
Our File No.: 30057.216

Dear Ms. Stauffer:

In Order No. PSC-14-0521-FOF-WS, the Commission established a methodology for determining the amount of the expense of Project Phoenix that should be included in the revenue requirement of Utilities Inc. subsidiaries, including the regulatory assets established in prior Commission Orders for most such subsidiaries. That methodology provides that "the total current number of total ERCs would be divided by the total company ERCs in place at the time Phoenix Project was implemented." In addition, it is appropriate to pro forma those additional ERC's known to connect subsequent to the test year. Attached is a schedule showing the change in ERCs.

Further, Order No. PSC-14-0521-FOF-WS allocated \$3,136 (\$784 annually) in rate case expense that should be included in the rate case expense in this Docket. Should you or the staff have any questions please do not hesitate to contact me.

Very truly yours,

MARTIN S. FRIEDMAN
For the Firm

MSF/
Enclosure

cc: John Hoy (via e-mail)
Patrick Flynn (via e-mail)
Darrien Pitts (via e-mail)
Kyesha Mapp, Esquire (via e-mail)
Penny Buys (via email)
Steve Reilly, Esquire (via email)

Utilities, Inc.

ERC Totals Used for Allocations

	End of Year ERCs				
	Total	Annual Change		Cumulative Change	
		Number	% from 2008	Number	% from 2008
2008	296,950				
2009	278,347	(18,603)	-6.3%	(18,603)	-6.3%
2010	270,837	(7,510)	-2.5%	(26,113)	-8.8%
2011	270,351	(486)	-0.2%	(26,599)	-9.0%
2012	265,278	(5,073)	-1.7%	(31,672)	-10.7%
2013	268,218	2,939	1.0%	(28,732)	-9.7%
2014	270,076	1,858	0.6%	(26,874)	-9.1%

	2015 Acquisition Status				
Density	272,453	2,377	0.8%	(24,497)	-8.2% Closed 1/13/15
Heritage Hills	277,665	5,212	1.8%	(19,285)	-6.5% Under contract/Approval pending from NY PSC
WTSO	280,160	2,495	0.8%	(16,790)	-5.7% Under contract/Approval pending from LA PSC
TESI	297,085	16,925	5.7%	135	0.0% Under contract/Approval pending from LA PSC