

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: February 11, 2016

TO: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk

FROM: Kyesha Mapp, Attorney, Office of the General Counsel

RE: Docket No. 150230-WU - Application for amendment of Certificate of Authorization No. 247-W, to extend water service area to include land in Seminole County, by Sanlando Utilities Corporation.

Please place the attached correspondence from Martin S. Friedman in the above-referenced docket file.

KRM/as

From: [Martin S. Friedman](#)
To: [Kyesha Mapp](#)
Cc: [John Hoy](#); [Patrick Flynn](#); [Christie H. Kincaid](#); [Jared Deason](#)
Subject: UIF (Sanlando) Territory Amendment
Date: Wednesday, February 10, 2016 4:03:23 PM

Kyesha,

You have asked that I expand upon the financial burden/hardship that will the Utility (and subsequently the 111 or so lot owners in the new territory) will incur if the Utility is required to file the documentation required by Rule 25-30.565, F.A.C. That Rule requires a substantial number of financial schedules and detailed statements relating to the Sanlando system as a whole, which serves approximately 10,172 water customers throughout an expansive service area. Many of the required schedules are similar to those filed in a file and suspend rate case, and the cost to satisfy the Rule requirements would probably reach \$10,000. And to exacerbate the problem, the information that is derived from that documentation would have no bearing on the cost recovery from there 111 lots of the cost of extending lines to serve them. The Utility's proposal is for the 111 customers that benefit from the line extension to pay the cost of the extension. The new customer base upon connection of all properties is about a 1% increase in the Utility's customer base, certainly an immaterial increase.

In addition to the needless financial burden/hardship, as I pointed out previously, Commission precedence does not require compliance with the Rule in circumstances such as this. Please do not hesitate to contact me should you have any questions. Regards, Marty

MARTIN S. FRIEDMAN, ESQ.
Shareholder



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