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Commissioners: Art Graham, Chairman Julie I. Brown Donald J. Polmann Gary F. Clark Andrew Giles Fay



Division of Accounting and Finance Andrew L. Maurey Director (850) 413-6900

Public Service Commission

October 26, 2018

Mr. D. Bruce May, Jr. Holland & Knight LLP 315 South Calhoun Street, Suite 600 Tallahassee, FL 32301

Re: Docket No. 20180179-WU – Application for limited proceeding rate increase in Gulf County, by Lighthouse Utilities Company, Inc.

Dear Mr. May:

We have reviewed the minimum filing requirements (MFRs) submitted on September 26, 2018, on behalf of Lighthouse Utilities Company, Inc. (Lighthouse or Utility). After reviewing this information, we find the MFRs to be deficient. The specific deficiencies are identified below:

- 1. Pursuant to Rule 25-30.445(4)(d), Florida Administrative Code (F.A.C.), if a utility's application includes a request for recovery of plant in service, accumulated depreciation and depreciation expense, supporting detail shall be provided by primary account as defined by the National Association of Regulatory Utility Commissioners (NARUC) Uniform System of Accounts (USOA). Please provide supporting detail by primary account for the requested plant in service, accumulated depreciation expense.
- 2. Pursuant to Rule 25-30.445(4)(f)2., F.A.C., if a utility is requesting recovery of operating expenses, the total cost by primary account pursuant to the NARUC USOA shall be provided. Please provide the operating expenses by primary account.
- 3. Pursuant to Rule 25-30.445(7), F.A.C., the applicant shall provide a statement in its filing to the Commission which addresses whether the utility's rate base has declined or whether any expense recovery sought by the utility is offset by customer growth since its most recent rate proceeding or will be offset by future customer growth expected to occur within one year of the date new rates are implemented. Please provide a statement addressing the above.
- 4. Pursuant to Rule 25-30.445(3), F.A.C., the applicant should provide a filing fee as required by Rule 25-30.020(g), F.A.C. Rule 25-30.020(g)5., F.A.C., requires a utility with the existing capacity to serve from 2,001 to 4,000 ERCs to remit a fee of \$1,750.

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The Utility paid a filing fee of \$1,000 at the time that its application was filed; therefore, the Utility should remit the remaining balance of \$750.

- 5. Pursuant to Rule 25-30.445(4)(o)1., F.A.C., the applicant should provide a copy of all customer complaints that the utility has received regarding DEP secondary water quality standards during the past five years. Please provide all customer complaints, received by the Utility, regarding DEP secondary water quality standards during the past five years.
- 6. Pursuant to Rule 25-30.445(4)(o)2., F.A.C., the applicant should provide a copy of the most recent secondary water quality standards test results. Please provide the results of the Utility's most recent secondary water quality standards test.

Your petition will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than November 26, 2018.

Sincerely. Andrew L. Maurev Director

ALM:da

 cc: Division of Accounting and Finance (D. Andrews, Bennett, Bulecza-Banks, Fletcher, Norris) Division of Economics (Daniel, Friedrich, Hudson)
Division of Engineering (Graves, King, Knoblauch, Salvador)
Office of the General Counsel (Crawford, Nieves)
Office of Commission Clerk (Docket No. 20180179-WU)
Office of the Public Counsel