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DIVISION OF
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ANDREW L. MAUREY
DIRECTOR
(850) 413-6900

Public Service Commission

August 9, 2019

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

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COMMISSION
CLERK

Re: Docket No. 20190118-WU – Application for increase in water rates in Gulf County by Lighthouse Utilities Company, Inc.

Dear Mr. May:

We have reviewed the minimum filing requirements (MFRs) submitted July 12, 2019, 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 25-30.110(2), F.A.C., the MFRs shall be consistent and reconcilable with the Utility's annual reports. The following MFR schedules do not reconcile to the Utility's 2018 Annual Report. Please reconcile these amounts.
 - a. MFR Schedule A-19 (Comparative Balance Sheet – Equity Capital and Liabilities), Lines 21-23.
2. Pursuant to Rule 25-30.436(1)(b), F.A.C., the applicant should provide the names and addresses of all persons who own five percent or more of the applicant's stock. The applicant provided in (2)(c) of the application the names of said stockholders. However, the Utility did not provide the addresses. Please provide the addresses for all persons who own five percent or more of the applicant's stock.
3. Pursuant to Rule 25-30.437, F.A.C., each utility applying for a rate increase shall provide the information required by Commission Form PSC/ECR 19 (11/93), entitled "Class B Water and/or Wastewater Utilities Financial, Rate and Engineering Minimum Filing Requirements." Please revise the following items in accordance with this rule.
 - a. MFR Schedule B-1, Line 9 references MFR Schedule A-1 as a supporting schedule. However, the Utility's adjustment and final rate base listed on

Schedule B-1 does not reconcile with Schedule A-1. Please revise the incorrect schedule, along with all necessary fall-out schedules affected by the revision.

- b. The rate for the residential 2" meter size shown on MFR Schedule E-2 does not correspond with the rate indicated on the Utility's currently approved tariff.
 - c. The number of gallons shown in column (3) on MFR Schedule E-2 does not match the gallons shown on MFR Schedules E-14.
 - d. The instructions of MFR Schedule F-1, Gallons of Water Pumped, Sold and Unaccounted For in Thousands of Gallons, require the gallons pumped should match the supporting documentation. The gallons sold information on schedule F-1 does not match the gallons sold figures on the corresponding schedules E-2 and E-14.
4. Pursuant to Rule 25-30.440(1)b., F.A.C., the applicant should provide a detailed map showing the location and respective classification of the applicant's customers. Please provide a map that indicates the location and respective classification of the Utility's customers.
 5. Pursuant to Rule 25-30.440(2), F.A.C., the applicant should provide a list of chemicals used for water treatment, by type, showing the dollar amount and quantity purchased, the unit prices paid and the dosage rates utilized. Please provide the dosage rates utilized for each chemical used for water treatment.
 6. Pursuant to Rule 25-30.440(3), F.A.C., the applicant should provide a copy of the most recent chemical analyses for each water system conducted by a certified laboratory covering the inorganic, organic turbidity, microbiological, radionuclide, secondary and unregulated contaminants specified in chapter 62-550, F.A.C. Please provide the results of the Utility's most recent chemical analyses for inorganic, organic turbidity, microbiological, radionuclide, secondary and unregulated contaminants.
 7. Pursuant to Rule 25-30.440(8), F.A.C., the applicant should provide a list of all field employees, their duties, responsibilities, and certificates held, and an explanation of each employees' salary allocation method to the utility's capital or expense accounts. Please provide an explanation of the salary allocation method to the Utility's capital or expense accounts for each employee listed on page 215 of the Utility's MFR – Volume III Engineering Information.

Mr. D. Bruce May, Jr.

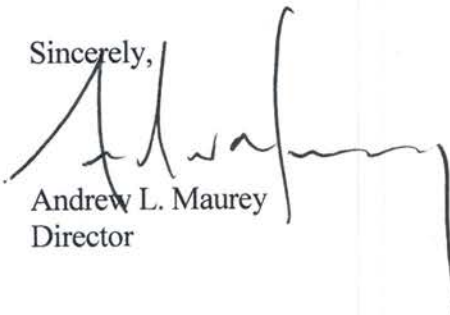
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8. Pursuant to Rule 25-30.440(9), F.A.C., the applicant should provide a list, by serial number and description, of all vehicles owned or leased by the utility showing the original cost or annual lease expense, who the vehicle is assigned to, and the method of allocation to the utility. Please provide the serial numbers and a description of all vehicles owned or leased by the Utility, as well as the original cost or annual lease expense, who the vehicle is assigned to, and the method of allocation.
9. Pursuant to Rule 25-30.440(10), F.A.C., the applicant should provide a list, by customer, of all complaints received during the test year, with an explanation of how each complaint was resolved. Please provide an explanation of how each complaint starting at page 224 of the Utility's MFR – Volume III Engineering Information was resolved.
10. Pursuant to Rule 25-30.440(11), 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 that the Utility has received regarding DEP secondary water quality standards during the past five years or indicate that no complaints were received.

If any above corrections require a corresponding change to any other MFR schedules, those corrected schedules must also be submitted in accordance with Rule 25-30.436(4)(e), F.A.C. 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 September 9, 2019.

Sincerely,



Andrew L. Maurey
Director

ALM:da

cc: Division of Accounting and Finance (D. Andrews, Bulecza-Banks, Fletcher, Norris, Thurmond)
Division of Economics (Bruce, Draper, Hudson)
Division of Engineering (Graves, King, Knoblauch, Salvador)
Office of the General Counsel (J. Crawford, Simmons)
Office of Commission Clerk (Docket No. 20190118-WU)
Office of the Public Counsel