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November 12, 2019

Adam Teitzman, Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

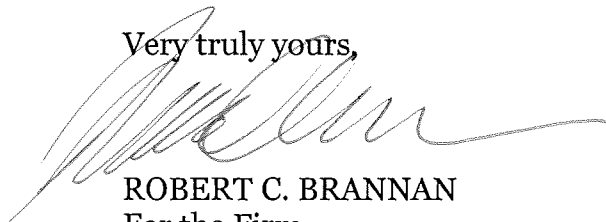
RE: Docket No.: 20190168-WS, Application for Original Certificate of Authorization  
and Initial Rates and Charges for Water and Wastewater Service  
Our File No.: 48070.01

Dear Mr. Teitzman,

Pursuant to Staff's First Data Request of November 7, 2019, please find our  
response attached hereto.

Should you have any questions regarding this filing, please do not hesitate to give  
me a call.

Very truly yours,



ROBERT C. BRANNAN  
For the Firm

Enclosure

**First Coast Regional Utilities, Inc.**  
**RATES & RATE STRUCTURE**

1. Please explain the methodology behind the Utility's percent allocation of its revenues between the base facility charge and gallonage charge for its water and wastewater systems.

**RESPONSE:**

The methodology used was in line with the Utility's objectives to maintain rates that will not only provide revenue stability but allows customers to pay rates more closely associated with the actual cost of providing service. Excessive consumption is discouraged through conservation levels.

**MISCELLANEOUS SERVICE CHARGES**

2. Regarding the Utility's labor calculation for its requested miscellaneous service charges, the Utility calculated the labor component using an hourly salary of \$20 and 1.33 hours to administer miscellaneous services. Typically, the Commission evaluates the labor component of requested miscellaneous service charges based on the separate administrative and field duties involved with administering miscellaneous services. Furthermore, the Commission typically approves miscellaneous service charges based on one-fourth hour of administrative labor and one-third hour of field labor.
  - a. Please specify how much of the 1.33 hours is attributable to administrative and field labor respectively and the job functions performed by each.

**RESPONSE:**

The total 1.33 hours is allocated to field labor and supervisor labor in the amount of 1.25 hours and .08 hour respectively. Job functions include the initial connection for new customers, normal reconnection of service, premise visits in lieu of disconnection and supervision of these services. There is no allocation to administrative as this function is included in contracted services account 632/732.

3. Please explain if there is supervisory labor performed while processing miscellaneous service charges as similarly indicated while processing the Utility's requested late payment charge. If not, please explain why.

**RESPONSE:**

Yes. Supervisory labor is performed and included in the cost as indicated in response to 2 a. above.