FILED 3/31/2020 DOCUMENT NO. 01667-2020 FPSC - COMMISSION CLERK

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DIVISION OF ENGINEERING TOM BALLINGER DIRECTOR (850) 413-6910

Public Service Commission

March 31, 2020

Mr. Troy Rendell Royal Waterworks, Inc. 4939 Cross Bathe Utility Boulevard New Port Richey, Florida 34652 trendell@uswatercorp.net STAFF'S SECOND DATA REQUEST VIA EMAIL

Internet E-mail: contact@psc.state.fl.us

Re: Docket No. 20190170- WS - Application for transfer of facilities and Certificate Nos. 259-W and 199-S in Broward County from Royal Utility Company to Royal Waterworks, Inc.

Dear Mr. Rendell:

Please provide the additional information requested below regarding Royal Waterworks, Inc. (Royal or Utility) to the Office of Commission Clerk by **April 30, 2020**.

1. In its response to staff's first data request, item 4, the Utility stated that some items reflected in O&M expenses should have been capitalized instead. Please complete the table below by identifying the unsupported plant items that Royal believes should be included in rate base. Add additional rows as necessary.

NARUC	ITEM	ORIGINAL COST	
ACCT			IN SERVICE

2. Item 3 of staff's first data request asked the Utility to explain which outsourced contract work would be eliminated by Royal. Additionally, staff requested the Utility quantify any savings achieved as a result of economies of scale, and Royal's response failed to do so.

PSC Website: http://www.floridapsc.com

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Please use the table below to identify the specific work functions the previous owner performed through outside contractors, the cost of said work, and what the work would have cost if it had been performed under contract with U.S. Water. The first column of the table lists functions cited in Royal's application, but may not be exhaustive. Modify as appropriate.

NATURE OF	CONTRACTOR	ANNUAL COST		EQUIVALENT COST	
CONTRACT/PERSONNEL				FOR U.S. WATER TO	
FUNCTION				PERFORM WORK	
		2017	2018	2017	2018
ACCOUNTING					
BILLING					
CUSTOMER SERVICE					
SYSTEM OPERATOR					
REPAIR					
METER READING					
ETC.					

- 3. In its November 7, 2019 response to staff inquiries, Royal attached a list of improvements that it has made to better the water quality. As we discussed on March 25, 2020, please provide invoices, and other documentation as appropriate, to support the cost of these improvements.
- 4. Rule 25-30.0371, Florida Administrative Code, states that, in determining whether extraordinary circumstances have been demonstrated pursuant to a request for a positive acquisition adjustment, the Commission shall consider, among other things, evidence provided to the Commission such as anticipated improvements in the utility's compliance with regulatory mandates. During the previous ownership, Royal Utility Company demonstrated timely compliance when correcting deficiencies and complying with regulatory mandates of the Department of Environmental Protection. If there are any other regulatory compliance issues the previous owner had, please identify them and state how Royal anticipates improving the Utility's compliance with regulatory mandates.

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Please file all responses electronically at the Commission's website at www.floridapsc.com, by selecting the Clerk's Office and Electronic Filing Web Form. Should the Utility have any questions, please feel free to contact me at (850) 413-6952 or email me at mwatts@psc.state.fl.us.

Sincerely,

/s/ Melinda Watts

Melinda Watts Engineering Specialist

MW:jp

cc: Office of Commission Clerk (Docket No. 20190170- WS)