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DIVISION OF ENGINEERING
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Public Service Commission

August 21, 2020

Martin S. Friedman, Esquire
Dean & Mead Law Firm
420 South Orange Ave. Suite 700
Orlando, FL 32801
mfriedman@deanmead.com

VIA EMAIL

Re: Docket No. 20200185-WS - Application for certificates to provide water and wastewater service in Lake and Sumter Counties, by Gibson Place Utility Company, LLC.

Dear Mr. Friedman:

Florida Public Service Commission (Commission) staff has reviewed the application for original water and wastewater certificates (application) submitted on behalf of Gibson Place Utility Company, LLC (GPU or Utility) on July 22, 2020. After reviewing this information we find the application to be deficient. The specific deficiencies are identified as:

- 1. Ownership Information.** Rule 25-30.033(1)(e), Florida Administrative Code (F.A.C.), requires that the applicant provide the name(s), address(es), and percent ownership of each entity or person who owns more than a 5 percent interest in the utility. Please provide the addresses of the persons and entities named in the application who own more than a 5 percent interest in GPU.
- 2. Requests for Service.** Rule 25-30.033(1)(k)2., F.A.C., requires that the applicant provide a copy of all requests for service from property owners or developers in areas not currently served. Please provide the required documents.
- 3. Proposed Rates and Charges.** Rule 25-30.033(1)(p), F.A.C., requires that the applicant provide the following to support the proposed rates and charges:
 1. The existing and projected cost of the system(s) and associated depreciation by year until design capacity is reached using the National Association of Regulatory Utility Commissioners (NARUC) 1996 Uniform System of Accounts (USOA), which is incorporated by reference in Rule 25-30.115, F.A.C. The applicant shall identify the year that 80 percent of design capacity is anticipated. If the utility will be built in phases, this shall apply only to the first phase;
 2. The existing and projected annual contributions-in-aid-of-construction (CIAC) and associated amortization by year including a description of assumptions regarding

- customer growth projections using the same projections used in subparagraph (1)(k)1. above for the proposed service area. The projected CIAC shall identify cash and property contributions and amortization at 100 percent of design capacity and identify the year when 80 percent of design capacity is anticipated. The projected CIAC shall be consistent with the service availability policy and charges in the proposed tariff provided in paragraph (q) below, the schedule provided in subparagraph (1)(p)6. below, and the CIAC guidelines in Rule 25-30.580, F.A.C. If the utility will be built in phases, this shall apply only to the first phase;
3. A schedule showing the projected capital structure including the methods of financing the construction and operation of the utility until the utility reaches 80 percent of the design capacity of the system. If the utility will be built in phases, this shall apply only to the first phase;
 4. The current annual operating expenses and the projected annual operating expenses at 80 percent of design capacity using the NARUC USOA. If the utility will be built in phases, this shall apply only to the first phase;
 5. A schedule showing how the proposed rates were developed;
 6. A schedule showing how the proposed service availability policy and charges were developed, including meter installation, main extension, and plant capacity charges, and proposed donated property; and,
 7. A schedule showing how the customer deposits and miscellaneous service charges were developed, including initial connection, normal reconnection, violation reconnection, and premises visit fees, consistent with Rules 25-30.311 and 25-30.460, F.A.C.
4. **Tariff.** Rule 25-30.033(1)(q), F.A.C., requires that the applicant provide a tariff containing all rates, classifications, charges, rules, and regulations which shall be consistent with Chapter 25-9, F.A.C. Please provide a tariff as required.

Staff acknowledges that the Utility is seeking a temporary waiver from the requirement of Rules 25-30.033(1)(p) and (q), F.A.C. However, in the event that the Commission denies the Utilities request for waiver, the requirements of these rules are included as deficiencies at the present time. Should the Commission subsequently grant GPU's request for waiver, the staff will evaluate the sufficiency and timeliness of the Utility's rate information filing at the time specified in the Commission's Order regarding the request for temporary waiver. Your application will not be deemed filed until the deficiencies identified in this letter have been corrected or otherwise addressed by Commission order. These corrections and the filing fee should be submitted no later than September 21, 2020, to the following address:

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

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Should you have any questions concerning the information in this letter, please feel free to contact Mrs. Melinda Watts by phone at (850) 413-6952 or email mwatts@psc.state.fl.us for technical questions, or Mr. Kurt Schrader by phone at (850) 413-6234 or email kschrade@psc.state.fl.us for legal questions. Please include the docket number on all submissions to the Commission Clerk.

Sincerely,

/s/ Melinda Watts

Melinda Watts
Engineering Specialist

MW:jp

cc: Office of the Commission Clerk (Docket No. 20200185-WS)