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# Public Service Commission

June 19, 2025

Mr. F. Marshall Deterding, Esq.  
Sundstrom & Mindlin, LLP  
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Tallahassee, FL 32301  
[mdeterding@sflaw.com](mailto:mdeterding@sflaw.com)

## STAFF'S THIRD DATA REQUEST VIA EMAIL

**Re: Docket No. 20250023-WS – Application for staff-assisted rate case in Polk County, by North Carolina Real Estate Projects LLC d/b/a Grenelefe Utility.**

Dear Mr. Deterding:

By this letter, the Commission staff requests that North Carolina Real Estate Projects LLC d/b/a Grenelefe Utility (Grenelefe or Utility) provide responses to the following data request:

1. Grenelefe reported no bad debt expense in its 2022, 2023, or 2024 Annual Reports filed with the Commission. Please confirm whether this is correct. If this is incorrect, please provide the actual bad debt expense for each of the above-mentioned years.

Please refer to “North Carolina Real Estate Projects LLC d/b/a Grenelefe Inc.’s application for staff-assisted rate case in Polk County” for the following questions:<sup>1</sup>

2. Please provide the name, position title, and a detailed description of responsibilities for both the Accounting and Operations Manager and the Owner. Additionally, specify the number of hours per month each individual devotes to Utility-related activities.
3. Please indicate whether the requested salaries of \$96,000 for the Accounting and Operations Manager and \$100,000 for the Owner include payroll taxes. If not, provide the amount of payroll taxes associated with each salary and how the amounts were calculated.
4. Please indicate whether any employment benefits will be provided to the requested Accounting and Operations Manager and the Owner. If so, please identify the type of benefit(s) and the associated cost(s).

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<sup>1</sup> Document No. 00204-2025, filed January 10, 2025, in Docket No. 20250023-WS.

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5. Please explain how the Utility intends to finance its proposed pro forma additions and provide any supporting documentation.
6. Please confirm whether expenses for contract laborers obtained through the Profession Employer Organization (PEO) will be recorded under Account 635 Contractual Services – Testing and/or Account 636 Contractual Services – Other. If not, identify the account(s) under which these expenses will be recorded.
7. Please identify and describe the specific factors that contribute to the increased monthly plant operations expenses of \$25,000.
8. With the addition of in-house personnel, please explain whether the utility anticipates a reduction of future contractual service expenses. If so, identify which contractual services will be reduced and the expected reduction amount.
9. Please indicate whether the Owner has any ownership interest in any other utilities in which he devotes labor hours towards.
10. Please provide copies of any bids, quotes, or invoices related to the two hydro-pneumatic pressure tank inspections. If bids, quotes, or invoices are not available, please explain how the associated costs were estimated.

Please file all responses no later than **Thursday, July 3, 2025**, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20250023-WS) and also please email the filed response to [discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us). Please contact me by phone at (850) 413-6974 or by email [aramirez@psc.state.fl.us](mailto:aramirez@psc.state.fl.us), if you have any questions.

Sincerely,

*s/ Ailynee Ramirez-Abundez*

Ailynee Ramirez-Abundez  
Public Utility Analyst  
Division of Engineering

ARA:da

cc: Office of Commission Clerk (Docket No. 20250023-WS)