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December 26, 2019
VIA E-FILING

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

RE: Docket No. 20190199-WS; Application for Quick Take Amendment of Certificates 278-W and 225-S in Seminole County by Utilities, Inc. of Florida
Our Matter No. 072563

Dear Mr. Teitzman:

The following is Utilities, Inc. of Florida's ("UIF") response to the Staff's First Data Request dated December 26, 2019.

1. As required by Section 120.542(5)(d), Florida Statutes (F.S.), please explain how the variance or the waiver requested would serve the purposes of the underlying statute?

Response: The purpose of Section 25-30.030(5)(b), F.A.C., that existing customers be noticed of an application for an extension of service area is so that they may evaluate the impact it may have on their rates and/or service and to express a position accordingly. In this case the application will add only 24 single family residences to UIF's water and wastewater systems, which consist of over 34,000 customers, which is a de minimis percentage, and potential impact on existing customers. The Commission has recognized the insignificant impact of small additions such as this by adopting the "quick take" amendment process with minimal documentation.

2. How would the Commission's application of Rule 25-30.030(5)(b), Florida Administrative Code, create a substantial hardship for the Utility, or violate principles of fairness as defined in Section 120.542(2), F.S.?

Response: The definition of "substantial hardship" in Section 120.542(2), F.S., includes economic hardship to the person requesting the waiver or variance. As noted in the Petition for Partial Variance or Waiver, the personnel, paper, printing, envelopes and postage to mail over 34,000 individual notices is over \$16,000. That economic cost far outweighs any benefit that those 34,000 existing customers will receive from getting the notices, given the de minimis impact this proceeding will have on the existing customers as discussed above.

Further, this Commission granted a substantially similar request in Order No. PSC-2017-0387-PAA-SU. As was required by the Commission in that Order, UIF is willing to post the Notice on its website for 30 days. The other noticing requirements have been complied with.

Should you or Staff have any questions regarding this response please do not hesitate to contact me.

Very truly yours,

/s/ Martin S. Friedman
MARTIN S. FRIEDMAN
For the Firm

MSF/

cc: Bryan Gongre (via email)
Bianca Lherisson, Esquire (via email)