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Public Service Commission

March 5, 2025

STAFF'S SECOND DATA REQUEST

via email

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

RE: Docket No. 20240108-SU – Application for increase in wastewater rates in Monroe County by K W Resort Utilities Corp.

Dear Mr. Friedman:

By this letter, the Commission staff requests that KW Resort Utilities, Corp. (KWRU) provide responses to the following data requests:

1. According to MFR Schedule B-6, the following expense accounts had substantial variations in certain months of the test year when compared to other months. For each of the accounts listed below, please provide explanations for the variations, as well as the Utility's calculations, basis, and work papers for each listed month.
 - a. Account 711 Sludge Removal Expense: August, October, and June
 - b. Account 718 Chemicals Expense: May and August
 - c. Account 750 Transportation Expenses: August, November, March, and June
 - d. Account 760 Advertising Expense: March, April, May, and June
 - e. Account 775 Miscellaneous Expenses: November, January, February, and May

2. Please provide documentation for all filled and vacant positions as well as employee names including executive/officer names, their titles, and salaries, during the test year.
3. Please provide, for each year from 2017-2024, the total payroll costs incurred by KWRU, by category of employee.
4. Please provide, for each year from 2017-2024, the total overtime costs allocated or charged to KWRU.
5. Please provide the Utility's policy for employee and executive/officer raises.
6. Please provide the amount of any employee severance costs incurred by KWRU in each of the last five years and as reflected in the test year claim.
7. Please provide the total relocation expenses incurred by KWRU in each of the last five years and as reflected in the test year claim.
8. Please provide a description of all incentive compensation programs provided to employees. For each program, please provide:
 - a. a description of the program
 - b. the performance criteria or factors used to determine awards
 - c. the amount included in the Utility's claim
 - d. the actual costs incurred in each of the past five years
 - e. the current number of participants.

9. Provide a list of all benefits offered to employees.
10. Provide a list of all benefits offered to officers.
11. Please provide a description of all incentive compensation programs provided to executives/ officers. For each program, please provide:
 - a. a description of the program
 - b. the performance criteria or factors used to determine awards
 - c. the amount included in the Utility's claim
 - d. the actual costs incurred in each of the past five years
 - e. by title, a list of all officers eligible to participate.
12. Please identify and quantify all officer compensation by component, including incentive awards and bonuses, paid in each of the past five years and indicate the portion of each component that is included in the Utility's proposed revenue requirement. Please also identify, by title, the officers whose compensation is included in this response.
13. Please describe any changes to incentive compensation programs over the past five years or that are projected for the future.
14. Please describe any changes in benefits offered to a) officers or b) employees in any of the past five years or projected for the future.
15. For each employee benefit, please provide the total costs incurred by the Utility in each of the past five years and as reflected in the test year claim.

16. Please fully describe any Supplemental Executive Retirement Plan (SERP) benefits or benefits associated with non-qualified retirement plans, and quantify the costs associated with such non-qualified plans that are included in the test year claim.
17. Please identify all compensation, bonuses, and benefits provided to members of the Board of Directors in each of the last five years and as included in the Utility's test year claim.
18. Please provide the Utility's General Ledger for the test year.
19. Please provide the 13-month average cash balance for the 2020-2024 and explain any variations in the level.
20. For the pro forma adjustments to annualize O&M expense on MFR Schedule B-3, please provide detailed work papers to support the Utility's calculations.
21. Please provide the most recent actual and estimated rate case expense, in addition to detailed explanations, support documentation, and calculations to justify actual and estimated expense to complete this rate case.
22. Please provide documentation of the most current millage rate.
23. On MFR Schedule B-8, the Utility references competitive wages charged by FCAA and KES. Please provide support documentation for the level of employee and officer/director salaries being requested in the instant docket.

Staff's Second Data Request

March 5, 2025

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Please file all responses electronically no later than Wednesday, March 26, 2025, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gcl@psc.state.fl.us.*

Please feel free to call me at (850) 413- 6218 if you have any questions.

Sincerely,

/s/ Suzanne Brownless
Suzanne Brownless
Special Counsel

SBr/ds

cc: Office of Commission Clerk