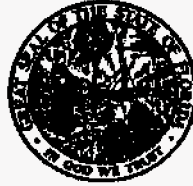


State of Florida

12

Commissioners:
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DIVISION OF WATER &
WASTEWATER
CHARLES HILL
DIRECTOR
(904) 488-8482

Public Service Commission

May 21, 1992

ORIGINAL
FILE COPY

Mr. Kenneth A. Hoffman
Messer, Vickers, Caparello, Madsen,
Lewis, Goldman & Metz, P.A.
P.O. Box 1876
Tallahassee, Florida 32302-1876

RE: Docket No. 920199-WS, Application of Southern States Utilities, Inc. and
Deltona Utilities, Inc. for increased water and wastewater rates.

Dear Mr. Hoffman:

We have reviewed the minimum filing requirements filed on behalf of the above
mentioned utilities and found them to be deficient. The specific deficiencies are identified
below:

1. Volume I, Book 3 of 4, Volume II, Books 1 through 6 of 11 and Volume III,
Books 1 through 3 of 6, Schedule B-7. The calculations have been made using
Average Equivalent Residential Connections. The minimum filing requirements
require the calculations to be made using customers, not Equivalent Residential
Connections.

ACK _____

2. Volume II, Book 7 of 11. Schedule D-4 has been omitted for Minnesota
Power and Light.

AFA _____

APP _____

CAF _____

3. Volume II, Book 11 of 11. Schedule F-3 for the Fern Park water system has
been omitted from the filing.

CMU _____

CTR _____

4. Volume II, Book 8 of 11 and Volume III, Book 4 of 6. Schedule E-2A for all
systems includes proposed miscellaneous service charge revenues in the "present
rates" column. The schedules should be corrected to include present miscellaneous
service revenues in the "present rates" column and refiled.

EAC _____

LEE _____

LIN _____

OSC _____

5. Volume II, Book 8 of 11:

RCI _____

SEC / _____

A. Fountains. There is no billing analysis to support the bills and gallons
that are identified on Schedule E-2A, page 297.

WAS _____

QTH _____

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- B. Fountains. Schedule E-2B has been omitted.
 - C. Fountains. Schedule E-3 has been omitted.
 - D. Intercession City. Separate billing analyses must be filed to support the SP and RG classes of service identified on Schedule E-2A, page 309.
 - E. Intercession City. The rates by meter size are not identified by meter size on Schedule E-1A, page 33.
 - F. Marion Oaks Utilities. The rates by meter size for the residential class of service are not identified on Schedule E-1A, page 47.
 - G. Meredith Manor. Separate billing analyses must be filled for the RG and SP Commercial classes as indicated in Schedule E-2A, page 324.
 - H. Palisades Country Club. Schedule E-2A must be supported by a billing analysis. The billing analysis on page 465 of Volume II, Book 10 of 11 does not support Schedule E-2A as required.
 - I. Quail Ridge. Schedule E-2A must be supported by a billing analysis. The billing analysis on page 539 of Volume II, Book 10 of 11 does not support Schedule E-2A as required.
 - J. Zephyr Shores. A billing analysis must be filed to support the separate Commercial class of service for 3 inch and 4 inch meters as well the PF class of service on Schedule E-2A, page 375.
 - K. Zephyr Shores. The billing analysis does not support the bill and gallons listed for the 1 1/2 inch and 2 inch meters on page 374-375 on Schedule E-2A.
6. Volume III, Book 4 of 6:
- A. Palm Terrace. A billing analysis must be filed to support the separate Residential RS2 class of service on Schedule E-2A, page 154.
 - B. South Forty. The billing analysis for residential customers on page 800 of Volume III, Book 5 of 6, does not support Schedule E-2A as required.
7. Volume II, Books 1 through 6 and 8 of 11 and Volume III, Books 1 through

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4 of 6. The E-2 schedules for water and wastewater showing total proposed revenues should match Schedules B-1 and B-2 that also lists the total proposed revenues. These schedules do not match. Either revised schedules must be filed or another set of schedules must be provided that reconciles this difference.

One further problem exists with the filing that is not a true deficiency. Generally, when a utility requests interim rates, the filing will include two extra columns on Schedule E-2 after present rates and revenues that identifies interim rates and revenues. This allows verification of present, interim and final rates using bills and gallons. Volume I, Book 1 of 4, does include schedules that list total interim revenues by system and another set of schedules that list interim rates by system. There is no combination of these elements that also lists bills and gallons. We believe that it is appropriate and necessary for the utility to provide that information with the filing of the deficiencies, either as separate schedules or included into the existing Schedules E-2A for both water and wastewater.

Please be advised that your petition will not be deemed filed until we have received the above mentioned information. This information should be submitted no later than June 10, 1992.

Sincerely,



Charles H. Hill
Director

cc: ✓ Division of Records and Reporting
Division of Legal Services (Feil, Bedell, Summerlin)
Division of Water and Wastewater (Willis, Merchant, Crouch, Messer)