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September 30, 2009

## HAND DELIVERY

Chairman Matthew M. Carter II Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re:

SSC

SGA

ADM

CLK

Utilities, Inc. of Florida

2009 General Rate Increase Application

Our File No. 30057.179

Dear Chairman Carter:

This letter, pursuant to Rule 25-30.430, Florida Administrative Code, requests approval of a test year for Lake Placid Utilities, Inc. (the "Company"). The Company intends to submit an application for general rate relief to the Florida Public Service Commission for its water and wastewater systems located in Marion, Orange, Pasco, Pinellas and Seminole Counties, Florida. The Company intends to submit the minimum filing requirements ("MFRs") on or before December 31, 2009.

The Company's last rate proceeding and review of rate base was in Docket No. 060253-WS, utilizing a test year ending December 31, 2005, which culminated in Order No. PSC-07-0505-PAA-WS, issued June 13, 2007.

The Company requests an historic test year ending December 31, 2008. The requested test year is representative of a normal full year of operation. However, there will be pro forma adjustments to expenses to reflect expenses in the year when rates will be in effect.

Since the Company's last rate proceeding, the Company has made major changes to plant and equipment for its water and wastewater systems, including refurbishment and/or replacement of pumps, valves, pipes, generators, fire hydrants and service lines. The Company has also refurbished and/or replaced storage tanks and other plant as well as converted disinfection systems to more effective systems and replaced distribution system components. Within that same period of time, there have been no major changes in operational methods.

DOCUMENT NUMBER - DATE

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The Company proposes to make the following major pro forma plant additions (with estimates in parenthesis):

- Replace a portion of Buena Vista TP distribution system (Phase 4) (\$300,000)
- Replace regional office telephone system (\$100,000)
- Replace electrical equipment at Weathersfield WTP (\$120,000)
- Construct Park Ridge emergency interconnect with Sanford (\$80,000)
- Replace Park Ridge distribution system components (\$250,000)
- Correct Ravenna Park collection system deficiencies (\$120,000)
- Replace electrical equipment at Ravenna Park WTP (\$80,000)
- Replace standby generator at Ravenna Park WTP (\$70,000)

The pro formas are non growth-related.

Pursuant to Section 367.081(8), Florida Statutes, the Company requests that the Commission process this petition for rate relief using the proposed agency action procedure. The Company also will request interim rates based on the historic test year.

Should you or members of the Staff have any questions regarding this request, please do not hesitate to contact me.

Very truly yours,

CHRISTIAN W. MARCELLI

For the Firm

**CWM** 

cc: John Hoy, Chief Regulatory Officer
Ms. Kirsten E. Weeks
Patrick C. Flynn, Regional Director
John Williams, Director of Governmental Affairs
Ms. Cheryl Bulecza-Banks, Division of Economic Regulation
Mr. Bart Fletcher, Division of Economic Regulation

Ms. Deborah Swain

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