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ACTING GENERAL COUNSEL  
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(850) 413-6199

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## Public Service Commission

October 15, 2009

F. Marshall Deterding  
Rose, Sundstrom & Bentley, LLP  
2548 Blainstone Pines Dr.  
Tallahassee, FL 32301

Staff's First Data Request  
Nos. 8-17

**Re: 080695-WU, In re: Application for general rate increase by Peoples Water Service Company of Florida, Inc.**

Dear Mr. Deterding:

By this letter, the Commission staff requests that Peoples Water Service Company of Florida, Inc. (company or utility), provide responses to the following data and document requests:

8. Data request No. 4 stated:

Schedule B-10 of the MFRs shows an estimate of \$25,000 for work performed by Robert Nixon of Cronin, Jackson, Nixon, and Wilson. Please provide invoices for all rate case work performed by Mr. Nixon in connection with Docket No. 080695-WU. Invoices should include the date of the work performed, the number of hours spent on each task, the hourly rate charged, a description of the work performed, and any estimated cost to complete the rate case, if any.

A statement was provided in response to the data request. Detailed invoices were not provided as requested. Please provide detailed invoices as requested above.

9. Data request No. 5 stated:

Schedule B-10 of the MFRs shows an estimate of \$35,000 for work performed by Paul DeChario of Cronin, Jackson, Nixon, and Wilson. Please provide invoices for all rate case work performed by Mr. DeChario in connection with Docket No. 080695-WU. Invoices should include the date of the work performed, the number of hours spent on each task, the hourly rate charged, a description of the work performed, and any estimated cost to complete the rate case, if any.

A statement was provided in response to the data request. Detailed invoices were not provided as requested. Please provide detailed invoices as requested above.

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10. On the Carlstedt, Jackson, Nixon, & Wilson statement, please explain or describe what was the "unbilled expense" for September 2009, and please provide itemized detail.
11. On the Carlstedt, Jackson, Nixon, & Wilson statement, please explain or describe what the "out-of-pocket" expenses were for each month billed, and please provide itemized detail.
12. Please explain or describe the relevance of the acquisition of the Innerarity utility system mentioned on the Rose, Sundstrom, & Bentley invoices as it relates to rate case expense in this proceeding. As part of this response, please supply any necessary supporting documentation.
13. Please explain or describe the relevance of "cutoff of Mobile Home Park" to rate case expense mentioned on the July 9, 2009 Rose, Sundstrom, & Bentley invoice.
14. Please supply the number of hours and dollar amounts billed for curing test year and MFR filing deficiencies. Please include any itemized amounts billed by Carlstedt, Jackson, Nixon, & Wilson, and Rose, Sundstrom, & Bentley.
15. The summary of "Actual and Estimated Rate Case Expense Through PAA Order" included "Filing Fees \$2,000" for a company expense. Rose, Sundstrom, & Bentley included a \$4,500 filing fee with its June 10, 2009, billing. Please explain or describe for what purpose the \$2,000 filing fee was included.
16. Original Invoice # 38568 shows a total cost of \$2,786. The October 12 Bill and payment report shows a total cost of \$1,532.30 for Invoice # 38568. Please explain or describe which invoice is correct and submit a copy of correct invoice.
17. Please provide a copy of the Rose, Sundstrom, & Bentley invoice for September 2009, in the amount of \$10,037.50. If the invoice is not itemized, please provide an itemized break down of this invoice

Please file the original and five copies of the requested information by October 23, 2009, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6084 if you have any questions.

Sincerely,

  
Erik L. Saylor, Senior Attorney

ELS/els

cc: Office of Commission Clerk ✓  
Peoples Water Service Company of Florida, Inc.  
Economic Regulation (Kummer, Stallcup, Lingo, Piper, Thompson)  
Regulatory Compliance (Casey, Polk, Beard)