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Public Service Commission

January 28, 2011

Mr. Charles deMenzes
Tradewinds Utilities, Inc.
P. O. Box 5220
1410 NE 8th Avenue
Ocala, FL 34478

Re: Docket No. 100127-WS - Application for an increase in water rates in Marion County, Florida by Tradewinds Utilities, Inc.

Dear Mr. deMenzes:

We have reviewed the revised minimum filing requirements (MFRs) submitted on January 10, 2011, on behalf of Tradewinds Utilities, Inc. (TUI or Utility). After reviewing this information, we find the MFRs to still be deficient. Explanations of the specific deficiencies are identified below.

1. Pursuant to Rule 25-30.436, Florida Administrative Code (F.A.C.), each page of the filing shall be consecutively numbered. However, none of the revised/supplemental MFR Schedule E-14 pages were numbered (consecutively or otherwise).
2. Pursuant to Rule 25-30.437, F.A.C., each utility applying for a rate increase shall provide the information required by Commission Form PSC/ECR 20-W (11/93), entitled "Class B Water and/or Wastewater Utilities Financial, Rate and Engineering Minimum Filing Requirements." Specifically, regarding MFR Schedule E-14, Billing Analysis Schedules, the Utility is required to:

"Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings provide the number of bills at each level by meter size or number of bills categorized by the number of units. Consumption is to be rounded to the nearest 1,000 gallons, and begin at zero. If a rate change occurred during the test year, provide a billing analysis which coincides with each period."

However, none of the pages of the revised/supplemental MFR Schedule E-14 conforms to this rule.

- (a) All of the pages of the revised/supplemental Schedule E-14 contain multiple title headings. On numerous pages, the title headings are not consistent with a prior title heading on the same page regarding either: i) customer class; ii) type of service (e.g., water or wastewater service); iii) meter size; or iv) some combination of these factors.

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(b) There is no residential service billing analysis corresponding to the period January 2009 through May 2009.

If these reconciliations require a corresponding change to any MFR schedules, those corrected schedules must also be submitted. Please be advised that, due to the deficiencies discussed above, a proper review of MFR Schedule E-2 will not be possible until the Utility files a MFR Schedule E-14 that is not deficient. Your petition will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than February 24, 2011. If you have any questions, please do not hesitate to contact Connie Davis at (850) 413-6932, or Jennie Lingo at (850) 413-6964.

Sincerely,



Marshall Willis
Director

MW/CD:kb

Cc: Division of Economic Regulation (Davis, Fletcher, Lingo, Maurey, Reiger, Daniel, Stallcup, Thompson)
Office of General Counsel (Jaeger)
Office of Commission Clerk (Docket No. 100127-WS)