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MARSHALL WILLIS, DIRECTOR **DIVISION OF ECONOMIC REGULATION** (850) 413-6900

Hublic Service Commission

March 10, 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 (MFR) information submitted on February 25, 2011, on behalf of Tradewinds Utilities, Inc. (TUI or Utility). After reviewing this information, we find that pages of MFR Schedule E-14, with the exception of p. 109 (see no. 4 below) are no longer deficient. However, as stated in the deficiency letter to you dated January 28, 2011, a proper review of Schedule E-2 was not possible until the Utility filed a MFR Schedule E-14 that was not deficient. Based on our review of MFR Schedule E-2 as it relates to the corrected pages of MFR Schedule E-14, we find that Schedule E-2 is still deficient. Explanations of the specific deficiencies are identified below.

- 1. Schedule E-2 (water - revision 1), p. 81, indicates residential gallons sold during the January 2009 - May 2009 period (period 1) equals 11,239,000 (11,239 kgals), while residential gallons sold during the June 2009 - December 2009 period (period 2) equals 14,540 kgals. However, on p. 102a of Schedule E-14 (water - revision 4) the actual residential kgals sold during period 1 is 12,393 kgals, while p. 103a of Schedule E-14 (water - revision 4) indicates that actual residential kgals sold during period 2 is 16,102 kgals. Please revise Schedule E-2 (water) p. 81 such that it reflects the actual kgals sold during periods 1 and 2 as reported on Schedule E-14 (water - revision 4) pp. 102a and 103a.
- 2. Schedule E-2 (water - revision 1), p. 81, indicates the sum of the general service gallons sold during period 1 equals 2,889 kgals, while p. 108c of Schedule E-14 (water – revision 4Σ indicates that the actual general service kgals sold during period 1 is 3,033 kgals. Similarly, Schedule E-2 (water - revision 1), p. 81, indicates the sum of the general service gallons sold during period 2 equals 3,815 kgals, while p. 108c of Schedule E-14 (water – revision 4) $\frac{1}{2}$ indicates that the actual general service kgals sold during period 2 is 4.001 kgals. Please \mathbf{z} revise Schedule E-2 (water - revision 1) p. 81 such that it reflects the actual kgals sold during periods 1 and 2 as reported on Schedule E-14 p. 108c. 000

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- 3. Schedule E-2 (water revision 1), p. 81, indicates that the rate for a general service customer on a 5/8" x 3/4" meter during period 1 was \$9.02; however, the correct rate should be \$9.03. Please revise Schedule E-2 (water revision 1) p. 81 to reflect this correction.
- 4. A review of Schedule E-14 (wastewater revision 4) p. 109 indicates that the consolidated factor calculation shown in column (7) equals the cumulative kgals billed figures in column (5). This is incorrect. Please revise this page, following the instructions for the correct calculation of consolidated factor figures for this schedule. In addition, please ensure that the resulting corrected consolidated factor at the 10 kgal consumption level is appropriately reflected on Schedule E-2 (wastewater revision 1), p. 83, for period 1.

Please be sure to make all associated mathematical recalculations to the schedules discussed above. In addition, if any correction or recalculation requires a corresponding change to any MFR schedules (including, but not limited to, any MFR F schedule that indicates actual gallons sold during the year), those corrected schedules must also be submitted. 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 April 11, 2011. If you have questions, please do not hesitate to contact Jennie Lingo at (850) 413-6964.

Sincerely, ncereiy, Nadel Walter-

Marshall Willis Director

MW/FJL

Cc: Division of Economic Regulation (Bulecza-Banks, Maurey, Fletcher, Daniel, Stallcup, Lingo, Rieger)

Office of General Counsel (Crawford, Jaeger) Office of Commission Clerk (docket file)