SUNDSTROM, FRIEDMAN & FUMERO, LLP Attorneys | Counselors

766 NORTH SUN DRIV. SUITE 403 LAKE MARY, FLORIDA 3274

> PHONE (407) 830-633 FAX (407) 830-852

> > www.sfflaw.cor

August 1, 2013

VIA E-FILING

FILED AUG 01, 2013 DOCUMENT NO. 04437-13 FPSC - COMMISSION CLERK

Ann Cole, Commission Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Re: Docket No. 120209-WS; Application for increase in water and wastewater rates in Marion, Orange, Pasco, Pinellas, and Seminole Counties by Utilities, Inc. of Florida. Our File No.: 30057.207

Dear Ms. Cole:

The following are the responses of Utilities, Inc. of Florida ("Company") to the Auditor's Report, Audit Control No 12-254-1-1.

Audit Finding No. 1- Commission Ordered Adjustments

The Company agrees with Staff's methodology for the adjustments to the Commission Ordered Adjustments, but has come up with a different adjustment amount for the increase in Seminole County's Wastewater Net Depreciation. On Staff's schedule in Audit Finding No.1, the Amort Other Tangible Plt for Seminole County Wastewater was incorrectly included as a credit balance instead of the debit balance shown in the General Ledger. Therefore, the Company believes that Seminole County's Wastewater Net Depreciation should not be increased by \$4,257; rather, it should only be increased by \$697. Please see schedule wp AF 1/1.

<u>Audit Finding No. 2- Contributions-in-Aid-of Construction</u> The Company accepts audit finding no. 2.

<u>Audit Finding No. 3- Operating Revenue</u> The Company notes audit finding no. 3 is made for information purposes only.

Audit Finding No. 4-Operations and Maintenance Expense-Reclassifications The Company accepts audit finding no. 4.

<u>Audit Finding No. 5- Operations and Maintenance Expense- Adjustments</u> The Company accepts audit finding no. 5. Ann Cole, Commission Clerk Office of Commission Clerk Florida Public Service Commission August 1, 2013 Page 2

<u>Audit Finding No. 6- Marion County – O&M Expense</u> The Company is willing to make adjustments in Marion County if it is appropriate to do so.

<u>Audit Finding No. 7- Taxes Other than Income.</u> The Company notes audit finding no. 7 is made for information purposes only.

If you have any questions, please feel free to contact me.

Very truly yours,

tuden

MARTIN S. FRIEDMAN For the Firm

cc: Kirsten Markwell (via e-mail) Darrien Pitts (via email) Patrick Flynn (via e-mail) Todd Brown (via e-mail) Steve Reilly (via email)

| NARUC Acct Description | MFR Schedule A-12 and A-14 | | | | | | Audit | | | | |
|---------------------------------|----------------------------|-----------|---------------------|----|----------------------------------|----|--------------------------------|------|-----------------------------------|----|--------------------------------|
| | 1: | 2/31/2011 | 13-Month Average | | 13-Month Average djustment | | 13-Month Average Balance | 1:57 | 13-Month Average Adjustment | | 13-Month Average Balance |
| Seminole County - Water | | | | | | | | | | | |
| 271 CIAC Other Tangible Plt | \$ | (396,273) | \$ (396,273) | \$ | ÷ | \$ | (396,273) | \$ | 296,212 | \$ | (100,061 |
| 272 A/A CIAC Other Tangible Plt | | 176,518 | 174,115 | | 416,248 | | 590,363 | | (117,931) | | 472,432 |
| Seminole County - Wastewater | | | | | | | | | | | |
| 271 CIAC Other Tangible Plt | | (269,264) | (269,264) | | = | | (269,264) | | 269,264 | | - |
| 272 A/A CIAC Other Tangible Plt | | 557 | 2,195 | | 373,271 | | 375,446 | | (2,195) | | 373,271 |
| Pasco County - Water | | | | | | | | | | | |
| 272 A/A CIAC Other Tangible Plt | | 164,993 | 164,803 | | (19,534) | | 145,269 | | (30,610) | | 114,659 |
| Pasco County - Wastewater | | | 14 | | | | | | | | |
| 272 A/A CIAC Other Tangible Plt | | 28 | <u>-</u> | | 129,115 | | 129,115 | | (23,424) | | 105,691 |

| | | Audit | | | |
|------------------------------|-------------|------------|-------------|------------|------------|
| Seminole County - Water | 12/31/2011 | Adjustment | Balance | Adjustment | Balance |
| 403 Dep Other Tangible Plt | (34,367) | (7,406) | (41,773) | 34,367 | (7,406) |
| 407 Amort Other Tangible Plt | (4,806) | 4,806 | | | |
| Net Depreciation | \$ (39,173) | \$ (2,600) | \$ (41,773) | \$ 34,367 | \$ (7,406) |

Seminole County - Wastewater

| (2,453) | (229) | (2,682) | 2,472 | (210) |
|-------------------|-------------|-------------|---------------|-----------------------|
| 1,775 | | 1,775 | (1,775) | |
| \$ (678.00) \$ | (229.00) \$ | (907.00) \$ | 697.00 \$ | (210.00) |
| \$ | 1,775 | 1,775 - | 1,775 - 1,775 | 1,775 - 1,775 (1,775) |