

FILED MAR 10, 2016 DOCUMENT NO. 01292-16 FPSC - COMMISSION CLERK

March 10, 2016

VIA E-FILING

Carlotta S. Stauffer, Commission Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

RE: Docket No. 150269-WS; Application for limited proceeding water rate increase in Marion, Pasco, and Seminole Counties, by Utilities, Inc. of Florida. Our File No. 30057.224

Dear Ms. Stauffer:

The following are the responses of Utilities, Inc. of Florida, ("Utility") to the Staff's Secondt Data Request dated February 25, 2016:

1. The following items relate to the Utility's requested rate case expense.

a) For each individual person, in each firm providing consulting services to the applicant pertaining to this docket, provide the billing rate and an itemized description of work performed. Please provide detail of hours worked associated with each activity. Also, provide a description and associated cost for all expenses incurred to date.

Response: See Attachment "2-1".

b) For each firm or consultant providing services for the applicant in this docket, please provide copies of all invoices for services provided to date.

Response: See Attachment "2-1".

c) If rate consultant invoices are not broken down by hour, please provide reports that detail by hour a description of actual duties performed, and amount incurred to date.

Response: N/A

d) Please provide an estimate of costs to complete the case by hour for each consultant or employee, including a description of estimated work to be performed, and detail of the estimated remaining expense to be incurred through the Limited Proceeding process.

Response: See Attachment "2-1".

e) Please provide an itemized list of all other costs estimated to be incurred through the Limited Proceeding process.

<u>Response</u>: See Attachment "2-1". The in-house expenses are unchanged from the original Schedule B-10, except to add the outside costs for copying the MFRs in the amount of \$103.09, and that Invoice is included in this attachment.

2. Do the current rates presented on Schedule No. 13, Column (b), include a gross-up for regulatory assessment fees for Marion, Pasco Phases I & II, and Seminole?

<u>Response</u>: The rates included in Column (b) are the currently approved rates for each County. These rates were approved for UIFs last index and pass-through application. The index and pass-through application calculation included a gross-up for regulatory assessment fees.

3. Please provide the Pasco County water utility expenses for 2015 in the same format as Schedules W-10(a) and W-10(b) used in the Class "A" or "B" Annual Report.

<u>Response</u>: Please see Attachment "2-3" which are Schedules W-10(a) and W-10(b) for Pasco County. Please note that these Schedules include allocated overhead from our parent company. Also, the numbers in the Schedules have not been finalized by our Corporate Office.

4. Please indicate on the 2015 Schedules W-10(a) and W-10(b) which expenses are being eliminated or reduced as a result of the abandonment of the wells in Pasco County.

<u>Response</u>: The following water utility expense accounts are impacted by the abandonment of the four Summertree wells: 615, purchased power; 618, chemicals; 620, materials and supplies, 635, contractual services – testing; 659, Insurance; 675 Misc. expense.

5. Please provide a justification for retaining each expense that is not totally eliminated in Column (d) – ".1 Source of Supply and Expenses – Operations," Column (e) – ".2 Source of Supply and Expenses – Maintenance," Column (f) – ".3 Water Treatment Expenses – Operations," and Column (g) – ".4 Water Treatment Expenses – Maintenance" as shown on the 2015 Schedules W-10(a) and W-10(b) for Pasco County.

<u>Response</u>: As noted in the Utility's March 2, 2016 response to Item 20 of OPC's Issues and Concerns Request, the abandonment of the Summertree wells is not expected to result in any decrease in manpower. The same number of field staff will be employed thereafter in order to comply with applicable FDEP rules and regulations regarding the operation, maintenance and repair of the water distribution and wastewater collection systems, to respond to alarms and abnormal events at any time, to respond to customer requests and inquiries, and otherwise maintain the Utility's infrastructure throughout its systems located in Pasco and Pinellas counties. Thus, no reduction in annual operating expense is to occur with respect to salaries and wages or employee pensions and benefits, Accounts 601 and 604, respectively.

Account 620, Materials and supplies expense, is expected to decrease to approximately \$10,400 per year from \$15,434. The Utility will continue to incur expenses associated with the operation, maintenance and repair of distribution system components and facilities such as: water mains; service lines; hydrants; valves; valve boxes; meters; meter boxes; tools; paint; personal protective equipment; and misc. fittings, brass works, and supplies.

Account 636, Contractual services – other, will be reduced to approximately \$1,800 per year (an average of \$150 per month) from \$3,216 per year reflecting the ongoing cost of sampling, analyzing and reporting the Summertree distribution system's water quality and flow data as mandated by FDEP's rules and regulations. This includes daily, monthly, quarterly, annual and triennial sampling events. Once the existing Summertree Water Use Permit, as issued by Southwest Florida Water Management District, is cancelled, a Wholesale Public Supply Permit will be issued by the District, which will contain specific monitoring and reporting requirements that will generate annual expense.

Account 659, Insurance expense, is expected to decrease as a consequence of well abandonment by \$2,296 reflecting the removal of the buildings and equipment from the well sites.

Account 675, Misc. expenses, is expected to decrease by approximately \$3,900 per year after the wells are abandoned. However, the Utility will continue to incur annual expenses such as: employee training and travel expense; uniforms; office utilities; office supplies; alarm systems; meter reading expenses; billing; postage; shipping; printing supplies; answering service; license fees; communications expense; and misc. other expenses.

In total, the Utility expects annual operating expense to decrease by approximately \$48,600 after the wells are abandoned.

6. Please explain the reason for the decrease in the Pasco County water utility purchased power expense from 2014 to 2015.

<u>Response</u>: The reduction in purchased power was mainly due to the loss of our irrigation customers at the end of 2014.

Carlotta S. Stauffer, Commission Clerk March 10, 2016 Page 4

Should you or Staff have any questions regarding this filing, please do not hesitate to give me a call.

Very truly yours,

Um site Juan

MARTIN S. FRIEDMAN For the Firm

MSF/ Enclosures

cc: John Hoy (via email) Patrick Flynn (via email) Danijela Janjic, Esquire (via email) Erik Sayler, Esquire (via email) Utilities, Inc. of Florida Docket No. 150269-WS Friedman & Friedman, P.A.

- Actual Attorney Fees through March 7, 2016 (Invoices & Report Attached): \$3,276.00.
- Actual Costs through March 7, 2016 (Invoices Attached): \$758.75
- Filing Fee: \$2,250.00 (not included in costs above)

ESTIMATE TO COMPLETE RATE CASE THROUGH PAA ORDER

Hours	Description
10.0 hrs.	Respond to formal and informal data requests from Staff and OPC and any other discovery requests, and miscellaneous correspondence and telephone conferences with client;
15.0 hrs.	Attend customer meetings in New Port Richey and Ocala;
2.5 hrs.	Review Staff recommendation; Conference with client and consultants regarding recommendation; Conference with Staff regarding recommendation.
15.0 hrs.	Travel to and from Tallahassee; Prepare for and attend Agenda conference, discuss Agenda with client and Staff.
1.0 hrs.	Review PAA Order; conference with client and consultants regarding PAA Order.
3.0 hrs.	Prepare revised tariff sheets, obtain Staff approval of tariffs; Draft customer notice, obtain Staff approval; Draft Affidavit of Mailing; Coordinate mailing of customer notices and implementation of tariffs.
46.5 hrs. @ \$360/hr.	\$16,740.00 – TOTAL ESTIMATED ATTORNEYS FEES

Estimate of costs to complete:

- \$ 860.00 Attend Two Customer Meetings, & Agenda Conference (travel/meals/hotel)
- <u>\$ 10.00</u> Estimated photocopier costs

\$ 870.00 TOTAL ESTIMATED AND UNBILLED COSTS

TOTAL ACTUAL AND ESTIMATED LEGAL FEES: <u>\$20,016.00</u> TOTAL ACTUAL AND ESTIMATED COSTS: <u>\$1,628.75</u> FILING FEE: <u>\$2,250.00</u>

Friedman & Friedman, P.A. 766 North Sun Drive, Suite 4030

766 North Sun Drive, Suite 4030 Lake Mary, Florida 32746 Phone: (407) 830-6331

F.E.I.: 46-4480334

May 5, 2015

	Total Fees & Disbursements		\$108.00
	Total Fees	0.30	\$108.00
04/13/15 M	ISF Review, research and respond to corres from Ms. DiPasquale regarding legal de format		\$108.00
FEES		Hou	<u>Amount</u>
FEES	Balance Due Now		\$108.00
RE:	UTILITIES INC. OF FLORIDA 2015 LIMITE	D PROCEEDING	
Attention:	John Stover	INVOICE	SE REFER TO NUMBER WHEN EMITTING.
Northbrook,	IL 60062 USA	File No.:	30057.224
Utilities, Inc. 2335 Sanders		Invoice No.:	1806

Friedman & Friedman, P.A. 766 North Sun Drive, Suite 4030

766 North Sun Drive, Suite 4030 Lake Mary, Florida 32746 Phone: (407) 830-6331

F.E.I.: 46-4480334

January 5, 2016

Utilities, Inc.					
2335 Sanders	s Road		Invoice No.:		2527
Northbrook,	IL 60062	USA	File No.:	30	057.224
Attention:	John St			PLEASE REFE VOICE NUMBE REMITTIN	R WHEN
RE:	UTILIT	TIES INC. OF FLORIDA 2015 LIMITED	PROCEEDING	9	
	Ba	lance Due Now			\$2,891.49
FEES					
				Hours	Amount
12/27/15 M	1SF	Review Prior PSC Orders and letter to M others regarding loss of irrigation revenue SAPs in various Tariffs and letter to Mr. I others concerning same;	es; Review	0.70	\$252.00
М	1SF	Review and revise Application and letter and others concerning same;	to Mr. Hoy	0.30	\$108.00
12/29/15 M	1SF	Review and comment upon draft MFRs; Conference with Mr .Hoy who telephone concerning same; Finalize application and Mr. Deason;	d	0.70	\$252.00
		Total Fees		1.70	\$612.00

DISBURSEMENTS

Litilities Inc.

Amount

	Total Fees & Disbursements	\$2,891.49
	Total Disbursements	\$2,279.49
12/22/15	FedEx	\$29.49
12/16/15	Filing Fee	\$2,250.00

Friedman & Friedman, P.A. 766 North Sun Drive, Suite 4030

766 North Sun Drive, Suite 4030 Lake Mary, Florida 32746 Phone: (407) 830-6331

F.E.I.: 46-4480334

February 5, 2016

Utilities, Inc	2.				
2335 Sander			Invoice No.:		2605
Northbrook,		2 USA	File No.:		30057.224
Attention:	John S	tover	Π	PLEASE RI NVOICE NUM REMITT	BER WHEN
RE:	UTILI	FIES INC. OF FLORIDA 2015 LIMITED I	PROCEEDIN	G	
	Ba	lance Due Now			\$1,396.20
FEES					
FEES				Hours	Amount
01/23/16 N	ASF	Research and draft letters to County Admi Marion, Pasco and Seminole Counties; Correspondence with Mr. Flynn; Research separate Initial Customer Notices; Letter t Mouring at PSC concerning same;	n and draft	2.10	\$756.00
01/26/16 N	ASF	Review Staff's first data request and letter and others concerning same; Corresponde Mr Mouring at PSC Staff regarding notice	nce with	0.20	\$72.00
01/27/16 N	ASF	Finalize Customer Notices and draft Affid Mailing and letter to Mr. Hoy and others of same;		0.30	\$108.00
01/28/16 N	ASF	Research and draft letters to librarians; Le Mouring at PSC;	etter to Mr.	0.30	\$108.00
01/29/16 N	ASF	Finalize and mail letters to librarians; corr with PSC attorney; letter to Mr. Flynn;	respondence	0.30	\$108.00

	Total Fees	3.20	\$1,152.00
DISBURSEM	ENTS		
			Amount
01/29/16	Legal Advertisment	•	\$244.20
	Total Disbursements		\$244.20
	Total Fees & Disbursements	- <u></u>	\$1.396.20

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Friedman & Friedman, P.A. 766 North Sun Drive, Suite 4030 Lake Mary, Florida 32746 Phone: (407) 830-6331

F.E.I.: 46-4480334

March 4, 2016

T 14:1141- T				
Utilities, Inc 2335 Sander	rs Road		Invoice No.:	2705
Northbrook,	, IL 60062	2 USA	File No.:	30057.224
Attention:	John St	tover		EASE REFER TO ICE NUMBER WHEN REMITTING.
RE:	UTILI	TIES INC. OF FLORIDA 2015 LIMITED I	PROCEEDING	
	Ba	lance Due Now		\$1,745.06
FEES				
			He	ours <u>Amount</u>
02/12/16 M	1SF	Review proposed responses and documen Flynn and begin draft of response to staff's request;		60 \$216.00
02/14/16 N	1SF	Review and incorporate customer compla response	ints into 0.2	20 \$72.00
02/15/16 N	1SF	Review documents and responses from M and incorporate in first data request responses		80 \$288.00
02/24/16 N	ASF	Begin research and draft of responses to C concerns; Research and draft Customer M Notices and letter to PSC Staff concerning	leeting	80 \$288.00
02/25/16 N	1SF	Telephone Conference with Mr. Deason w telephoned regarding responses to OPC Is Review Staff's 2nd Data Request and letter Hoy and other concerning same; Review,	sues; er to Mr.	80 \$288.00

	incorporate Mr. Deason's responses response to OPC Issues and Concerns;		
02/29/16 MSF	Review comments from PSC Staff on Customer Meeting Notices, and revise Notices accordingly; Draft Affidavit of Mailing and letter to Mr. Hoy and others concerning same;	0.30	\$108.00
	Total Fees	3.50	\$1,260.00
DISBURSEMENT	rs · · · · · · · · · · · · · · · · · · ·		
		,	Amount
	Photocopies		\$59.25
02/05/16	Legal Notice-Seminole		\$49.50
02/15/16	Legal Notice-Pasco		\$49.50
02/18/16	Advertise Legal Notice		\$244.20
02/23/16	FedEx-Overnight Delivery	÷	\$45.70
	FedEx-Overnight Delivery		\$36.91
	Total Disbursements		\$485.06
	Total Fees & Disbursements		\$1,745.06

Mar/ 8/2016

Friedman & Friedman, P.A. Time Listing Mar/ 1/2016 To Mar/ 7/2016

	Mar/	/ 1/2016 To Mar/ 7/2016				
Lwyr Lawyer Date Matter	Client Matter Description		Law Type			
Entry # Task			Law TAbe	Hours	Rate	Total
MSF Martin S. Friedma Mar 2/2016 30057.224 31842	D Utilities, Inc. UTILITIES INC. OF FLORIDA 2015 L		util			
No Hold BWM	Review, revised and incorporate OPC's First Concerns and letter			0.30	360.00	108.00
32093 No Hold BWM	Otilities, Inc. UTILITIES INC. OF FLORIDA 2015 L Review customer correspondence f responses and letter to Mr. Moy	IMITED PROCEEDING iled in docket and staff		0.10	360.00	36.0
	*** :	Summary by Task Code ***				
Task Code			Eouri		Amount	
· · · · · ·		*** Billable ***		_		
BWM - Billable Work Mo:	ithly	-	0.40		144.00	
Total Billable			0.40	0	144.00	
Total:		•	0.40	δ	144.00	
	*** Sum	mary by Working Lawyer ***				
Working Lawyer			Hours	•	Amount	
MSF - Martin S. Friedman			0.4	o	144.00	
Total:		•	0.4		144.00	
REPORT SELECTIONS - Time						
Layout Template	Default					
Advanced Search Filter	None					
Requested by	MSF		_			
Finished		March 08, 2016 at 11:46:01	1 AM			
Ver		.1.20150324)				
Date Range		016 To Mar/ 7/2016				
Matters	30057.22	4				
Clients	All	,				
Major Clients	A11					
Client Intro Lawyer	A11					
Matter Intro Lawyer	A11					
Responsible Lawyer	All					
Type of Law	A11					
Select From	Active,	Inactive, Archived Matters				
Working Lawyer	A11					
Task	All					
Summarize by Type of Law	No					
	Order En	itered				
Sorted by	Both					
Sorted by Time/Fee						
	No					
Time/Fee Include Daily totals	No No					
Time/Fee Include Daily totals Include Held Items only	No					
Time/Fee Include Daily totals						

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12/30/2015	2:14:00 PH EST	
Team Member: Doshia W.		
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SAL F		

BW 1S Copy/Print 959 0 0.1000 T 000001 Reg. Price 0.12 Regular Total 115.08 Discounts 19.18 Total 95.90

Sub-Total	95.90
Tax	7.19
Deposit	0.00
Total	103.09
AmEx (S) Account: 7009 Auth: 526063 (A)	103.09
Total Tender	103.09
Change Due	0.00

UTILITY NAME: UTILITIES, INC. OF FLORIDA

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SYSTEM NAME / COUNTY : Pasco County

ACCT. NO. (a)	ACCOUNT NAME (b)		CURRENT YEAR (c)		.1 URCE OF PPLY AND PENSES - ERATIONS (d)	SUPPLY AND EXPENSES -		
601	Salaries and Wages - Employees	s	163,400	s	35,948	s	9,804	
001	Salaries and Wages - Employees Salaries and Wages - Officers,	_°—	105,400		55,746		5,001	
603	Directors and Majority Stockholders		8,792					
603	Employee Pensions and Benefits		52,620		11,576	-	3,157	
604	Purchased Water		52,020		11,570	-	5,157	
010	Furchased water					-		
615	Purchased Power		26,765		26,765	-		
616	Fuel for Power Purchased		-					
618	Chemicals		9,189		9,189			
620	Materials and Supplies		38,585		15,434		3,858	
631	Contractual Services-Engineering		0		0			
632	Contractual Services - Accounting	1-	7,210					
633	Contractual Services - Legal		(144)					
634	Contractual Services - Mgt. Fees		-					
635	Contractual Services - Testing		-					
636	Contractual Services - Other		13,215					
641	Rental of Building/Real Property		232					
642	Rental of Equipment		35					
650	Transportation Expenses		11,486		2,527		689	
656	Insurance - Vehicle		-	_				
657	Insurance - General Liability		18,719					
658	Insurance - Workman's Comp.		-					
659	Insurance - Other		4,101		902		246	
660	Advertising Expense		-					
	Regulatory Commission Expenses							
666	- Amortization of Rate Case Expense		-			_		
667	Regulatory Commission ExpOther		197			_		
668	Water Resource Conservation Exp.		-					
670	Bad Debt Expense		12,823					
675	Miscellaneous Expenses		42,629					

W-10(a) GROUP _____ UTILITY NAME:

UTILITIES, INC. OF FLORIDA

YEAR OF REPORT 31-Dec-15

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SYSTEM NAME / COUNTY : Pasco County

asco county

WATER EXPENSE ACCOUNT MATRIX								
.3 WATER TREATMENT EXPENSES - OPERATIONS (f)	.4 WATER TREATMENT EXPENSES - MAINTENANCE (g)	.5 TRANSMISSION & DISTRIBUTION EXPENSES - OPERATIONS (h)	.6 TRANSMISSION & DISTRIBUTION EXPENSES - MAINTENANCE (i)	.7 CUSTOMER ACCOUNTS EXPENSE (j)	.8 ADMIN. & GENERAL EXPENSES (k)			
\$ <u>35,948</u> <u>11,576</u>	\$3,157	\$18,417	\$4,736	\$	\$ <u>2</u> <u>8,792</u> <u>2</u>			
		16,206	3,087	6,607	7,210 -144 			
2,527	689 	4,020	1,034		232 35 1 25,255			
				12,823 21,315	0 197 21,315			
\$50,953	\$13,896	\$ 97,268	\$23,932	\$40,745	\$69,504			

W-10(b) GROUP _____

UTILITY NAME: UTILITIES. INC. OF FLORIDA

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YEAR OF REPORT 31-Dec-14

SYSTEM NAME / COUNTY : Pasco County

WASTEWATER UTILITY EXPENSE ACCOUNT MATRIX								
			.1	.2	.3	.4	.5	.6
ACCT. NO.	ACCOUNT NAME	CURRENT YEAR	COLLECTION EXPENSES- OPERATIONS	COLLECTION EXPENSES- MAINTENANCE	PUMPING EXPENSES - OPERATIONS	PUMPING EXPENSES - MAINTENANCE	TREATMENT & DISPOSAL EXPENSES - OPERATIONS	TREATMENT & DISPOSAL EXPENSES - MAINTENANCE
(a)	(b)	(c)	(d)	(e)	(1)	(g)	(h)	(i)
701	Salaries and Wages - Employees	\$ 14,773	\$ 443	\$ 1,773	\$ 2,955	\$ 739	s <u>7,091</u>	s <u>1,773</u>
703	Salaries and Wages - Officers, Directors and Majority Stockholders	781	<u></u>					
704	Employee Pensions and Benefits	5,957	179	417	715	298	l,787	715
710	Purchased Sewage Treatment	185,644	the second s	11.11.11.11.11.11.11.11.11.11.11.11.11.	₩anapara at 1	the second second from	185,644	
711	Sludge Removal Expense	9,302	and the set		Summer in 1		9,302	
715	Purchased Power	5,525		projection 🗓 🐔	1,381		4,144	
716	Fuel for Power Purchased	-		front after the second		the design of the second		
718	Chemicals	4,942					4,942	
720	Materials and Supplies	11,799	472	1,888	2,832	708	4,719	1,180
731	Contractual Services-Engineering	0						
732	Contractual Services - Accounting	640						i
733	Contractual Services - Legal	(13)						
734	Contractual Services - Mgt. Fees	-		-		l		
735	Contractual Services - Testing							\
736	Contractual Services - Other	1,306						
741	Rental of Building/Real Property	21]	———		
742	Rental of Equipment	3				I		
750	Transportation Expenses	1,020	31	122	204	51	490	122
756	Insurance - Vehicle	-						
757	Insurance - General Liability	1,942			1		I	
758	Insurance - Workman's Comp.	<u> </u>				<u> </u>	I	I
759	Insurance - Other	425						
760	Advertising Expense	· · · ·					Complete Scales (C.). Colors	
766	Regulatory Commission Expenses - Amortization of Rate Case Expense	<u> </u>					aliverial	
767	Regulatory Commission ExpOther	17						
770	Bad Debt Expense	12						1997 - 19
775	Miscellaneous Expenses	4,236					·	
	Total Wastewater Utility Expenses	\$	s <u>1,125</u>	\$ <u>4,200</u>	\$ <u>8,087</u>	\$ <u>1,796</u>	\$ 218,119	s <u>3,790</u>

S-10(a) GROUP

YEAR OF REPORT 31-Dec-15

UTILITY NAME: UTILITIES, INC. OF FLORIDA

SYSTEM NAME / COUNTY : Pasco County

WASTEWATER UTILITY EXPENSE ACCOUNT MATRIX

		.7	.8	.9	.10	.11	.12
				RECLAIMED	RECLAIMED	RECLAIMED	RECLAIMED
				WATER	WATER	WATER	WATER
ACCT.		CUSTOMER	ADMIN, &	TREATMENT	TREATMENT	DISTRIBUTION	DISTRIBUTION
NO.	ACCOUNT NAME	ACCOUNTS	GENERAL	EXPENSES-	EXPENSES-	EXPENSES-	EXPENSES-
		EXPENSE	EXPENSES	OPERATIONS	MAINTENANCE	OPERATIONS	MAINTENANCE
(a)	(b)	(j)	(k)	(1)	(m)	(n)	(0)
701	Salaries and Wages - Employees	s	S	S	S	\$	\$
703	Salaries and Wages - Officers,						
	Directors and Majority Stockholders		781				
704	Employee Pensions and Benefits	1,847					
710	Purchased Sewage Treatment		States and a state of the little	Contemport in	State of the second second		Second Statistics of
711	Sludge Removal Expense				Supervision of the second		
715	Purchased Power						
716	Fuel for Power Purchased						
718	Chemicals	S. Philippines (Section					
720	Materials and Supplies						
731	Contractual Services-Engineering		0				
732	Contractual Services - Accounting		640				
733	Contractual Services - Legal		-13				
734	Contractual Services - Mgt. Fees						
735	Contractual Services - Testing		0				
736	Contractual Services - Other	653	652				
741	Rental of Building/Real Property		21				
742	Rental of Equipment		3				
750	Transportation Expenses						
756	Insurance - Vehicle						
757	Insurance - General Liability		10,311				
758	Insurance - Workman's Comp						
759	Insurance - Other		425				
760	Advertising Expense		0				
766	Regulatory Commission Expenses - Amortization of Rate Case Expense		0			TUR	
767	Regulatory Commission ExpOther		17				
770	Bad Debt Expense	12		and the strength		A DESCRIPTION OF	and the second second
775	Miscellaneous Expenses	2,118	2,118				
Т	Total Wastewater Utility Expenses	\$4,630	\$14,955	s <u> </u>	s	\$	s

S-10(b) GROUP