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FRIEDMAN, FRIEDMAN & LONG, P.A. ATTORNEYS & COUNSELORS

DOCKET NO. 140060-WS

March 24, 2014

Chairman Art Graham Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Sanlando Utilities Corporation 2013 General Rate Increase Application Our File No. 30057.214

Dear Chairman Graham:

This letter, pursuant to Rule 25-30.430, Florida Administrative Code, requests approval of a test year for Sanlando Utilities Corporation (the "Company"). The Company intends to submit an application for general rate relief to the Florida Public Service Commission for its water and wastewater systems located in Seminole County, Florida. The Company intends to submit the minimum filing requirements ("MFRs") on or before July 1, 2014.

The Company's last rate proceeding was in Docket No. 110257-WS, utilizing a test year ending December 31, 2010, which resulted in the issuance of Order No. PSC-13-0085-PAA-WS dated February 14, 2013.

The Company requests an historic test year ending December 31, 2013. The requested test year is representative of a normal full year of operation. However, there will be pro forma adjustments to expenses to reflect expenses in the year when rates will be in effect.

Since the Company's last rate proceeding, the Company has experienced increases in O&M expense such as salaries and wages, insurance, purchased power, and chemicals that were not completely offset by reductions in other annual operating expenses or annual indexing rate increases. Additionally, the Company has made major changes to plant and equipment in its wastewater system. The pro forma adjustments are non growth-related. Within this same period of time, the Company has made a major change in its operational methods, the diversion of raw wastewater from its Des Pinar WWTP to its Wekiva Hunt Club WWTP. This diversion resulted in avoidance of significant capital investment in the Des Pinar WWTP that was otherwise necessary in order to meet newly established nutrient limits set by the Florida Department of Environmental Protection.

Additionally, the Company completed the construction of a 6.5-mile long reuse transmission main that allows the Company to dispose of reuse-quality effluent effectively and reliably.

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The Company anticipates including the following pro forma plant additions, all of which are wastewater projects, and all of which will be completed and placed into service within 24 months of the proposed test year end of December 31, 2013:

- 1. <u>Wekiva Hunt Club WWTP EQ Tank and Headworks</u>: This project consists of the engineering design, permitting, and construction of a 0.850 million gallon equalization tank, headworks improvements, pumping equipment, piping, instrumentation, and associated items. Increases in peak and average day flow impair the plant's performance by frequently reducing the effluent quality below reclaimed water standards resulting in permitted discharges into a tributary of the Wekiva River. Additionally, the existing splitter box is at the end of its service life and must be replaced. The projected capital cost is \$2,200,000.
- 2. <u>Wekiva Hunt Club WWTP Electrical Improvements</u>: The project includes the engineering design, permitting, fabrication and installation of electrical equipment including motor control centers, distribution panels, the main electrical bus, and associated equipment that replaces equipment that is at the end of its service life but critical to the operation of the treatment facility. The projected cost of the project is \$600,000.
- 3. <u>Sanlando Collection System Improvements</u>: The project includes an investigation of portions of the Sanlando collection system that are likely to have deficiencies that allow excess inflow and infiltration to enter the collection system. It also includes making improvements to the collection system to correct any deficiencies found. The projected capital cost is \$1,000,000.

Pursuant to Section 367.081(8), Florida Statutes, the Company requests that the Commission process this petition for rate relief using the proposed agency action procedure. The Company also will request interim rates based on the historic test year.

Should you or members of the Staff have any questions regarding this request, please do not hesitate to contact me.

Very truly yours,

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Martin S. Friedman For the Firm

cc: John Hoy (via e-mail) Patrick C. Flynn (via e-mail) Darrien Pitts (via email) John Williams (via e-mail)