

R+K

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DIVISION OF WATER &
WASTEWATER
CHARLES HILL
DIRECTOR
(904) 413-6900

Public Service Commission

March 12, 1996

Mr. Frank R. Manno
c/o Conservation Billing Services, Inc.
90 S. Newtown Street Road, Suite 3
Newtown Square, Pennsylvania 19073-4035

Dear Mr. Manno:

Re: Docket No. 960009-WS, Request for exemption from Florida Public Service Commission regulation for provision of water and wastewater service in Pinellas County by Brookgreen Apartments.

Thank you for taking the time to meet with staff on February 22nd regarding the proposed methodology for metering Brookgreen Apartments. Based on the discussion at that meeting, please provide the following supplemental information:

1. **Hot Water Usage.** According to information provided in the application and at the meeting, CBSI has established a conversion factor of hot water usage to total water usage of 3.5, plus or minus three percent (3%). Staff cannot make a recommendation to the Commission regarding an unconventional methodology absent any supporting documentation. At a minimum, please provide:

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC /
- WAS _____
- OTH _____

a) More detailed information on how the 3.5 ratio was established by CBSI. For instance, how many of the ninety-four (94) communities were used for the study? How long were they metered? What were the actual results by community?

b) Please identify any prior reseller exemptions filed by CBSI which utilized hot water metering methodology.

c) At the meeting, you indicated there is virtually no difference in the 3.5 ratio for units with different numbers of rooms, square footage or number of occupants. Please identify all variables studied by CBSI and the results.

DOCUMENT NUMBER-DATE

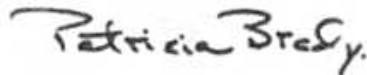
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While staff will make every effort to file a recommendation in this docket on or before the currently scheduled due date of May 3, 1996, the original case management schedule did not anticipate that the recommendation would have to be taken to agenda for Commission vote. As a result, the schedule may need to be revised. Should this turn out to be the case, I apologize in advance for the oversight.

If you have any questions regarding the information being requested, please feel free to contact me at 904/413-6686.

Sincerely,



Patricia Brady
Regulatory Analyst III
Bureau of Policy Development
and Industry Structure

PLB:plb

cc: Raj Agarwal, Division of Legal Services
Records and Reporting

Ms. Victoria L. Peterson
Conservation Billing Services, Inc.
5452 West Crenshaw, Suite 4
Tampa, Florida 33634

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- d) Please provide details of typical resident reaction to hot water usage methodology including the extent to which measurable water conservation resulted. Also please indicate the extent to which initial resident reaction temporarily distorted the ratio and the degree and duration of the distortion.
 - e) Please identify any independent studies known to CBSI regarding hot water usage methodology. Where possible, provide a copy of the study. Otherwise, please summarize how the study was designed and the overall results.
 - f) Please identify the extent to which CBSI is aware of hot water metering currently being utilized in Florida and other states.
2. **Fictitious Name.** According to Florida's Department of State, Division of Corporation, Brookgreen Apartments is not registered as a fictitious name for Clearwater Apartments I Limited Partnership. Instead, it appears to be a fictitious name for Owners Property Management Corporation, Inc. Please provide an explanation of the discrepancy or an explanation of the linkage between Owners Property Management Corporation, Inc., and Clearwater Apartments I Limited Partnership.
3. **Meter Deposits.** Attachment No. 11 to the application indicates an agreement between CBSI and the reseller regarding resident deposits. In the attachment it was stated that "residents moving in are subject to paying a water deposit as established by the reseller within the guidelines of the PSC." Subsequent to the filing of this application, you were notified by legal staff that deposits not held by the reseller are controversial. If the request for customer deposits is being withdrawn, please provide a statement to that effect signed by the applicant.

The original and four copies of CBSI's response to the information requested above should be filed by April 10, 1996, with the:

**Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850**