State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE:

SEPTEMBER 10, 1998

TO:

DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYÓ)

FROM:

DIVISION OF WATER AND FLETCHER) MERCHÂNT. WASTEWATER (WILLIS,

DIVISION OF LEGAL SERVICES (VACCARO)

RE:

DOCKET NO. 960444-WU - APPLICATION POR RATE INCREASE AND FOR INCREASE IN SERVICE AVAILABILITY CHARGES IN LAKE

COUNTY BY LAKE UTILITY SERVICES, INC.

COUNTY: LAKE

AGENDA:

SEPTEMBER 22,1998 - REGULAR AGENDA - DECISION PRIOR TO

HEARING - INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: 8-MONTH EFFECTIVE DATE: FEBRUARY 8, 1999

SPECIAL INSTRUCTIONS: NONE

S:\PSC\WAW\WP\960444.RCM FILE NAME AND LOCATION:

CASE BACKGROUND

Lake Utility Services, Inc., (LUSI or utility) is a Class B utility located in Lake County. LUSI is a wholly-owned subsidiary of Utilities, Inc. and provides no wastewater service. The service area is composed of eighteen subdivisions, which are served by twelve water plants. All of the plants are basically pump and chlorinate with hydro pneumatic tanks. There are ten plants in the South Clermont Region. In this region there are groups of two (Oranges-Vistas), three (Clermont I-Amber Hill-Lake Ridge Club) and four (Highland Point-Crescent Bay-Crescent West-Lake Crescent Hills) interconnected plants with one stand alone plant (Clermont II). The other two plants (Lake Saunders & Four Lakes) are outside The minimum filing requirements (MFRs) filed in this docket indicate that the service area contained a total of 915 customers at the end of 1995. The utility reported adjusted test year operating revenues of \$313,946 for its water operations for

DOCUMENT NUMBER-DATE

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1995. According to the St. Johns River Water Management District, LUSI is in a water conservation area.

The utility filed this application for a rate increase on June 3, 1996. The utility was notified of several deficiencies in the filing by staff. Those deficiencies were corrected, and the official filing date was established as July 9, 1996. The utility's requested test year for both interim and final rates is the historical period ended December 31, 1995. Also, the utility requested that this case be processed using the Proposed Agency Action (PAA) procedure pursuant to Section 367.081(8), Florida Statutes.

During the course of this PAA rate case, staff identified a large number of errors in both the MFRs and the utility books. The attempts to correct these errors resulted in several staff information requests and three five-month statutory time extensions. The responses from the utility contained more errors. The first numbers resulted in a negative rate base. Although the second set of numbers indicated a relatively small rate base, it was staff's opinion that this rate case should proceed without further delays.

The Commission issued PAA Order No. PSC-97-0531-FOF-WU on May 9, 1997. In that order, rates were set and an overall rate of return of 9.26% was approved. On May 30, 1997, LUSI filed a Petition on Proposed Agency Action, protesting certain portions of the PAA Order No. PSC-97-0531-FOF-WU. Pursuant to Section 120.80 (13)(b), Florida Statutes, those portions of the PAA Order which were not protested are deemed stipulated. On July 21, 1997, the Office of Public Counsel (OPC) filed a notice of intervention in this docket. By Order No. PSC-97-0899-PCO-WU, issued July 30, 1997, the Commission acknowledged OPC's intervention.

On September 17, 1997, LUSI filed an offer of settlement to avoid the time and expense of further litigation in this docket. LUSI also filed a motion for continuance, requesting that further activity in this docket cease, pending final negotiation with the By Order No. PSC-97-1092-PCO-WU, issued September 19, 1997, LUSI's motion was granted. Pending the Commission's review of the utility's offer of settlement, LUSI filed three eight-month statutory time extensions. By PAA Order No. PSC-98-0683-AS-WU, issued May 18, 1998, the Commission accepted LUSI's settlement offer. OPC opposed the settlement at the time of the Commission's consideration of that matter. On June 8, 1998, OPC filed a petition on PAA, protesting Settlement Order No. PSC-98-0683-AS-WU and requesting a hearing on its protest. As a result of OPC's protest of Order No. PSC-98-0683-AS-WU, this matter was scheduled to proceed to hearing on September 15-16, 1997.

Following OPC's protest, the parties attempted to settle this case in lieu of proceeding to a hearing. During settlement negotiations, review of data presented in LUSI's 1997 annual report suggested that LUSI may be overearning under the interim rates set in this docket, due to increased customer growth. Settlement negotiations reached a stalemate, and, as a result, on August 27, 1998, LUSI filed a Notice of Withdrawal of Offer of Settlement and Notice of Withdrawal of Protest of PAA. By its notice, LUSI indicated its intent to withdraw its September 17, 1997 settlement offer and to withdraw its May 30, 1997 petition on PAA, by which it protested Order No. PSC-97-0531-FOF-WU. It is LUSI's opinion that its withdrawal makes Order No. PSC-98-0683-AS-WU moot, eliminates the need for a hearing and allows Order No. PSC-97-0531-FOF-WU to be effective on the date the utility provided its notice. Following LUSI's notice of withdrawal, a Prehearing Conference was held on August 31, 1998.

At the Prehearing Conference, the Prehearing Officer continued that proceeding, based on staff's recommendation that the prehearing and hearing dates be rescheduled by the Chairman to give staff sufficient time to bring this recommendation to the earliest possible Agenda Conference. The Chairman's office postponed further action pending review of this recommendation which addresses LUSI's withdrawal of its settlement offer and petition on PAA, as well as the resolution of the case.

DISCUSSION OF ISSUES

<u>ISSUE 1</u>: Should the Commission acknowledge Lake Utility Services, Inc.'s Notice of Withdrawal of Offer of Settlement and Notice of Withdrawal of Protest of PAA?

RECOMMENDATION: No. The Commission should not acknowledge Lake Utility Services, Inc.'s notice of withdrawal, because the utility is precluded from withdrawing its settlement offer and protest. Furthermore, the Commission, on its own motion, should dismiss the utility's application for increased rates and service availability charges without prejudice. (VACCARO, MERCHANT, FLETCHER)

STAFF ANALYSIS: As stated in the Case Background, LUSI has filed a notice of withdrawal of its settlement offer and withdrawal of its May 30, 1997 protest of the first PAA order in this docket. Staff notes that this is a case of first impression, and in order for staff to properly address this matter, it is necessary to turn back to LUSI's protest of Order No. PSC-97-0531-FOF-WU and then proceed to each subsequent event. In doing so, it will become apparent how each event affects the preceding events, and how the outcome supports staff's recommendation.

<u>Discussion Regarding Notice of Withdrawal</u>

On May 30, 1997, LUSI filed a petition on PAA, protesting Order No. PSC-97-0531-FOF-WU. LUSI limited its protest to the following issues contained in that order: the proposed findings regard to LUSI's quality of service; the proposed determination of the amount of plant in service; the proposed determination of the amount of non-used and useful plant; the proposed determination of contributions in aid of construction to be deducted from rate base; the proposed determination of rate case expense; the proposed determination of fall-out issues including depreciation. accumulated reserve, depreciation, amortization, accumulated amortization, revenue requirement and monthly rates, as affected by the preceding issues; and the proposed service availability charges. Pursuant to Section 120.80 (13)(b), Florida Statutes, those portions of the PAA Order which were not protested were deemed stipulated. The portions of the PAA Order which were protested ceased to exist, because LUSI's request for a hearing on those issues "is a de novo proceeding, which . . . is intended 'to formulate final agency action, not to review action taken earlier and preliminarily.'" See Florida Department of Transportation v. J.W.C. Company, Inc., 396 So. 2d 778, 786-787 (Fla. 1st DCA 1981) citing McDonald v. Department of Banking and Finance, 346 So. 2d 569 (Fla. 1st DCA 1977).

Following the utility's protest and its prefiling of direct testimony, staff made discovery requests on the utility and conducted depositions of its witnesses. Based on the information provided by LUSI, staff prefiled its direct testimony, which supported higher rates and charges than those approved by the Commission in the PAA Order, but lower than those requested by LUSI. As a result of staff's testimony, the utility filed an offer of settlement, in which it stated that "in order to avoid the time and expense of litigation it [was] willing to compromise its position and to accept the rates and charges supported by the staff's testimony as the basis for a settlement of this rate proceeding."

Under the specific terms of the settlement, LUSI agreed to accept the following: staff's calculated individual account balances of plant in service; the amount of CIAC calculated by staff; rate case expense in the amount contained in the PAA Order; staff's fall-out calculations, including depreciation, accumulated depreciation, amortization, accumulated amortization, revenue requirement and rates; staff's calculation of service availability charges; a return on equity of 11.61 percent; and amortization of rate case expense over four years. LUSI further indicated in its settlement that it did not agree to staff's position regarding methodology and calculation of used and useful, or any other issue not specifically addressed in the offer of settlement.

By Order No. PSC-98-0683-AS-WU, issued May 18, 1998, the Commission accepted the utility's settlement offer. In that Order, the Commission specifically stated that it accepted LUSI's offer of settlement "as a reasonable resolution of this matter." The Commission reiterated on page six of the Order that the issues which were not protested were deemed stipulated and stated that its acceptance of the settlement offer "resolves all issues in PAA Order No. PSC-97-0531-FOF-WU." (Emphasis added.) Therefore, this second Order superseded the original PAA Order, thus, eliminating the existence of the original PAA Order, with regard to the disputed issues. Further, because LUSI's settlement offer specifically excluded the protested issues of used and useful and quality of service, and because Order No. PSC-98-0683-AS-WU resolved the first PAA Order, those issues cease to exist in this docket.

On June 8, 1998, OPC filed a petition on PAA, protesting Order No. PSC-98-0683-AS-WU, and requesting a formal hearing on its protest. OPC protested the following issues approved in the Commission's Order: plant in service; CIAC; fall-out issues, including accumulated depreciation and revenue requirement; service availability charges; and return on equity. OPC did not protest the approved rate case expense, and pursuant to Section 120.80(13), Florida Statutes, that issue is deemed stipulated. OPC also raised

the following issues in its protest: LUSI's quality of service; the appropriate calculation of LUSI's used and useful plant; LUSI's cost of capital and capital structure; and LUSI's alleged over collection of allowances for fund prudently invested charges. OPC is precluded from raising these issues, because they go beyond the scope of Order No. PSC-98-0683-AS-WU.

Based on OPC's protest and the foregoing analysis, staff believes that LUSI is precluded from withdrawal of its settlement offer. Order No. PSC-98-0683-AS-WU accepted LUSI's settlement offer as a resolution of the protested issues in the original PAA Order. Rule 25-22.029(4), Florida Administrative Code, provides, in part, that one whose substantial interest will be affected by the Commission's proposed action may file a petition for a Section 120.57, Florida Statutes, hearing. This is exactly what OPC did; it filed a protest of the Commission's Order as provided for by rule. Staff is unaware of any provision in the Florida Administrative Code or Chapter 120, Florida Statutes, which allows a utility to withdraw a settlement offer once the Commission issues a proposed agency action accepting that offer, and a substantially affected person files a protest of that action.

Furthermore, LUSI is precluded from withdrawing its protest of the original PAA Order. Order No. PSC-98-0683-AS-WU superseded the original PAA Order, thus, eliminating the existence of the original PAA Order, at least with regard to the disputed issues. Therefore, with regard to those issues in dispute, the original PAA Order no longer exists. Section 367.011(2), Florida Statutes, grants the Commission exclusive jurisdiction over each utility with respect to its rates. OPC has requested a formal hearing based on issues under the exclusive jurisdiction of the Commission. LUSI's withdrawal of its PAA protest is an attempt to divest the Commission of its jurisdiction over OPC's protest, which it is prohibited from doing. See Wiregrass Ranch, Inc. v. Saddlebrook Resorts, Inc., 645 So. 2d 374 (Fla. 1994). Based on the foregoing, staff recommends that the Commission should not acknowledge Lake Utility Services, Inc.'s notice of withdrawal, because the utility is precluded from withdrawing its settlement offer and protest. Nevertheless, as set forth below, staff believes that this case should not proceed to hearing.

Dicussion Regarding Dismissal of Case

During the settlement negotiations after OPC's protest was filed, staff became aware that the utility had dramatically increased its customer base since 1995 and also may have understated its earnings in its 1997 annual report. When staff reviewed this, we found several areas of concern. In 1995, the utility reported 920 customers of record. As of the end of 1997, the utility reported 1,518 customers, or a 65 percent increase in

two years. Further, the utility reflected that its achieved rate of return on its 1997 annual report was 5.31 percent. When staff recalculated LUSI's achieved rate of return, using the parent's capital structure, consistent with the capital structure used for rate setting purposes, we found that the utility had overstated income tax expense in its annual report. Staff's prima facie calculation reflected that LUSI was earning approximately 11.06 percent on its unadjusted rate base.

As discussed earlier, the interim rates from this current docket were in effect for all of 1997. When staff attempted to estimate the revenues that would have been collected prior to interim, we could not reconcile the revenues reported with the number of customers or bills that were reported. This made it appear that the utility understated its 1997 revenues by more that \$60,000. Had the utility collected this amount in revenues during 1997, the overearnings would have been even greater. Coupled with the fact that LUSI's 1997 annual report was not adjusted for the numerous rate base adjustments found during the PSC staff audit and discovery during this rate case, staff is very uncomfortable accepting the 1997 annual report figures without the opportunity to audit these amounts.

Based on our discussions with the utility, as well as reading utility Witness Rasmussen's prefiled rebuttal testimony, it appears that the utility is currently undertaking numerous capital improvement projects with estimated costs of \$1.4 million from 1998 to the year 2000. The majority of this construction will take place in 1999. Based on our cursory review, it appears that most of this construction will be non-revenue producing and relates to interconnecting the facilities and improving water pressure to current customers.

Based on all of the above points, staff does not believe that the 1995 test year is reasonable to establish rates on a going-forward basis. This case has been a regulatory quagmire from the beginning. The minimum filing requirements had to essentially be refiled twice, and the auditors had to perform a 100 percent review of all plant and rate base documentation from either the date of inception or purchase of the individual facilities, due to the lack of supporting documentation retained by the utility. The staff engineers also had an extremely difficult time determining the amount of used and useful plant because of inaccurate flow data, no support for the margin reserve and inadequate maps of the systems. In the two plus years that this docket has been open, staff has spent more that double the amount of time on this Class B utility than we do on a staff assisted rate case.

While staff is greatly frustrated by this case, we do believe that we could establish reasonable and representative rates for this utility in the future. However, given the constraints of this case, the material growth in customers, and the staleness of the test year, we do not believe that the Commission, at this time, will be able to approve rates which are just, reasonable, compensatory, and not unfairly discriminatory, as required by Section 367.081(2)(a), Florida Statutes. Based on the foregoing circumstances, staff recommends that the Commission, on its own motion, dismiss LUSI's application for increased rates and service availability charges without prejudice, allowing the utility to refile if it so chooses.

ISSUE 2: Should interim rates be refunded and what rates should be placed into effect?

RECOMMENDATION: If the Commission approves staff's recommendation in Issue No. 1, the utility should refund all interim rates collected. The refund should be made with interest in accordance with Rule 25-30.360(4), Florida Administrative Code. The utility treat any unclaimed refunds as CIAC pursuant to Rule 25-30.360(8), Florida Administrative Code. Further, the utility should file revised tariffs reflecting the rates established in Order No. PSC-96-0504-AS-WU and attached to this recommendation as Schedule 1. The utility should also file a proposed customer notice to reflect the appropriate rates. The approved rates should be effective for service rendered on or after the stamped approval date on the tariff sheets pursuant to 25-30.475(1), Florida Administrative Code. The rates should not be implemented until proper notice has been received by the customers. The utility should provide proof of the date notice was given no less than 10 days after the date of notice. (MERCHANT)

STAFF ANALYSIS: In Order No. PSC-96-1187-FOF-WU (Interim Order), issued on September 23, 1996, the utility's proposed rates were suspended and interim water rates were approved subject to refund, pursuant to Sections 367.082, Florida Statutes. The approved interim revenue is shown below:

 Revenues
 \$ Increase
 % Increase

 Water
 \$399,013
 \$85,067
 27.10

The test period for establishment of interim and final rates in this case was the historical twelve months ended December 31, 1995. As discussed in the Interim Order, the utility's rates prior to interim were a result of a settlement in Docket No. 950232-WU. By Order No. PSC-96-0504-AS-WU, the Commission accepted the stipulation that the rates included in "Staff Proposed Rate Structure (Revised)", became LUSI's current Commission approved rates immediately prior to any interim adjustment in this rate case. For interim rates in this current docket, staff applied the 27.10 percentage across the board to the rates stipulated in the settlement.

Since staff has recommended that the case be dismissed, the utility should be required to refund all of its interim rates collected. The refund should be made with interest in accordance with Rule 25-30.360(4), Florida Administrative Code. The utility

should treat any unclaimed refunds as CIAC pursuant to Rule 25-30.360(8), Florida Administrative Code.

The utility should be required to file revised tariff sheets and a proposed customer notice to reflect the appropriate rates. These rates are attached to this recommendation as Schedule No. 1. The approved rates should be effective for service rendered on or after the stamped approval date on the tariff sheets pursuant to 25-30.475(1), Florida Administrative Code. The rates should not be implemented until proper notice has been received by the customers. The utility should provide proof of the date notice was given no less than 10 days after the date of notice.

ISSUE 3: Should this docket be closed?

RECOMMENDATION: Yes. This docket should be closed after the time for filing an appeal has run, upon staff's verification that the utility has completed the required refunds with interest and the proper revised tariff sheets and customer notice have been filed by the utility and approved by staff. Further, the utility's corporate undertaking may be released upon staff's verification that the refund has been completed. (VACCARO)

STAFF ANALYSIS: If the Commission approves staff's recommendation, this docket should be closed if an interested person to this docket does not file a notice of appeal 32 days after the issuance of the final order, and upon staff's verification that the utility has completed the required refunds with interest, and the proper revised tariff sheets and customer notice have been filed by the utility and approved by staff. Further, the utility's corporate undertaking may be released upon staff's verification that the refund has been completed.

LAKE UTILITY SERVICES, INC

COUNTY:

SCHEDULE NO. 1-A

LAKE DOCKET NO. 960444-WU

RATE SCHEDULE - MONTHLY WATER RATES (BI-MONTHLY BILLING CYCLE)

TEST YEAR ENDING: DECEMBER 31, 1995

CRESCENT BAY, PRESTON COVE, SOUTH CLERMONT REGION AND ALL FUTURE AREAS SERVED

	Rates Prior to	Rates Approved	Commission Approveds	Utility Requested	Staff Recommended
Residential	Eiling	In Seitlement	Interim Sec	Enal	Rates
Base Facility Charge:					
Meter Size:					
5/8 x 3/4"	\$16.52	\$6.80	\$8.64	\$18.00	\$6.80
3/4"			\$0.00	~-	-
1"		\$17.00	\$21.61	\$27.00	\$17.00
1 1/2"		\$34.00	\$43.21	\$45.00	\$34.00
2"		\$54.40	\$69.14	\$90.00	\$54.40
3"			\$0.00	\$144.00	
4"			\$0.00	\$288.00	
6"			\$0.00	\$450.00	
Gallonage Charge per 1,000 Gallons	\$1.86	\$0.84	\$1.07	\$2.195	\$0.84
General Service Base Facility Charge:					
Meter Size:					
5/8 x 3/4"	\$16.52	\$6.80	\$8.64	\$18.00	\$6.80
3/4"	\$24.74		\$0.00		
1"	\$41.24	\$17.00	\$21.61	\$27.00	\$17.00
1 1/2"	\$82.49	\$34.00	\$43.21	\$45.00	\$34.00
2"	\$131.97	\$54.40	\$69.14	\$90.00	\$54.40
3"	\$263.94		\$0.00	\$144.00	
4"	\$412.41		\$0.00	\$288.00	
6"			\$0.00	\$450.00	
Gallonage Charge per 1,000 Gallons	\$1.86	\$0.84	\$1.07	\$2.195	\$0.84
				riek ditinak Inchirancia	
5/8" x 3/4" meter			pical Residentia di	A STATE OF THE STA	
3,000 Gallons	\$22.10	\$9.32	\$11.85	\$24.59	\$9.32
5,000 Gallons	\$25.82	\$11.00	\$13.98	\$28.98	\$11.00
10,000 Gallons	\$35.12	\$15.20	\$19.32	\$39.95	\$15.20
•					

LAKE UTILITY SERVICES, INC

SCHEDULE NO. 1-B

COUNTY: LAKE

DOCKET NO. 960444-WU

RATE SCHEDULE - MONTHLY WATER RATES (BI-MONTHLY BILLING CYCLE)

TEST YEAR ENDING: DECEMBER 31, 1995

CLERMONT I & II, AMBER HILL, HIGHLAND POINT, THE ORANGES, LAKE RIDGE CLUB, CRESCENT WEST, LAKE CRESCENT HILLS, THE VISTAS I & II

	Rates Prior to	Rates Approved	Commission Approved	Utility Requested	Staff Recommended
Residential and General Service	<u> Filing</u>	In Settlement	Interior	Final	Rates
Base Facility Charge:					
Meter Size:					
5/8 x 3/4"	\$7.035 A	\$6.80	\$8.64	\$18.00	\$6.80
3/4"	~-		\$0.00		
1"		\$17.00	\$21.61	\$27.00	\$17.00°
1 1/2"		\$34.00	\$43.21	\$45.00	\$34.00
2"		\$54.40	\$69.14	\$90.00	\$54.4 0 .
3 ^H			\$0.00	\$144.00	
4"	~~		\$0.00	\$288.00	
6"	~ <u>~</u>		\$0.00	\$450.00	
Gallonage Charge per 1,000 Gallons	\$0.69	\$0.84	\$1.07	\$2.195	\$0.84
			ostosta tarta arabanda Propistraj la Pridestra		
5/8" x 3/4" meter:	To Constitute the Constitute of the Constitute o	Ŋ		3111	
3,000 Gallons	\$7.04	\$9.32	\$11.85	\$24.59	\$9.32
5,000 Gallons	\$7.04	\$11.00	\$13.98	\$28.98	\$11.00
10,000 Gallons	\$10.49	\$15.20	\$19.32	\$39.95	\$15.20
(A) Includes 5,000 gallons per mon	th				

LAKE UTILITY SERVICES, INC

SCHEDULE NO. 1-C

COUNTY: LAKE

DOCKET NO. 960444-WU

RATE SCHEDULE - MONTHLY WATER RATES (BI-MONTHLY BILLING CYCLE)

TEST YEAR ENDING: DECEMBER 31, 1995

HARROR OAKS AND FOUR LAKES SURDIVISIONS

	Rates Prior to	Commission Approved	Utility Requested	Staff Recommended
sidential and General Service	Bling	<u>្នាស់ វិកិន្ទ ខ</u>	<u> </u>	Rates
Base Facility Charge:				
Meter Size:				
5/8 x 3/4"	\$5.54 (A)	\$7.04	\$18.00	\$5.54 (A
3/4"		\$0.00		
1"		\$0.00	\$27.00	
1 1/2"		\$0.00	\$45.00	••
2"		\$0.00	\$90.00	•• \(\frac{1}{2} \)
3"		\$0.00	\$144.00	
4"	4-	\$0.00	\$288.00	_ 1.
6"		\$0.00	\$450.00	
Gallonage Charge per 1,000 Gallons	\$0.81	\$1.03	\$2.195	\$0.81
SUN 13/4W interfer		3.18.12		
3,000 Gallons	\$5.54	\$10.13	\$24.59	\$5.54
5,000 Gallons	\$7.16	\$12.19	\$28.98	\$7.16
10,000 Gallons	\$11.21	\$17.34	\$39.95	\$11.21
(A) Includes 3,000 gallons per month				

LAKE UTILITY SERVICES, INC

SCHEDULE NO. 1-D

COUNTY: LAKE

DOCKET NO. 960444-WU

RATE SCHEDULE - MONTHLY WATER RATES (BI-MONTHLY BILLING CYCLE)

TEST YEAR ENDING: DECEMBER 31, 1995

LAKE SAUNDERS ACRES

	Rates Prior to	Commission Approved	Utility Requested	Staff. Recommended
Residential and General Service 1994 and Service	an Zilinge	Interim	Final and	Rates
Base Facility Charge:				
Meter Size:				
5/8 x 3/4"	\$16.52	\$21.00	\$18.00	\$16.52
3/4"		\$0.00	·	
1"		\$0.00	\$27.00	
1 1/2"		\$0.00	\$45.00	
2"		\$0.00	\$90.00	:
3"		\$0.00	\$144.00	
4"		\$0.00	\$288.00	<u> </u>
6"		\$0.00	\$450.00	
Gallonage Charge per 1,000 Gallons	\$1.86	\$2.36	\$2.195	\$1.86
/8" x 3/4" meter		oical Residential E		
3,000 Gallons	\$22.10	\$28.09	\$24.59	\$22.10
5,000 Gallons	\$25.82	\$32.82	\$28.98	\$25.82
10,000 Gallons	\$35.12	\$44.64	\$39.95	\$35.12