BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for transfer of portion of Certificate No. 380-W in Marion County from A. P. Utilities, Inc. to Ocala Oaks Utilities, Inc., holder of Certificate No. 346-W, and amendment of certificates.

DOCKET NO. 981030-WU

In re: Application by Ocala
Oaks Utilities, Inc. for limited
proceeding to impose current
water rates, charges,
classifications, rules,
regulations, and service
availability policies on Hawks
Point and 49th Street Village
customers that are currently
served by A. P. Utilities, Inc.
in Marion County.

DOCKET NO. 981029-WU
ORDER NO. PSC-99-1925-PAA-WU
ISSUED: September 28, 1999

The following Commissioners participated in the disposition of this matter:

JOE GARCIA, Chairman
J. TERRY DEASON
SUSAN F. CLARK
JULIA L. JOHNSON
E. LEON JACOBS, JR.

ORDER APPROVING TRANSFER

AND

NOTICE OF PROPOSED AGENCY ACTION
ORDER APPROVING RATE BASE FOR PURPOSES OF TRANSFER AND
APPROVING OCALA OAKS UTILITIES, INC.'S REQUEST TO
IMPLEMENT RATES AND CHARGES

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the actions to approve rate base for the purposes of transfer, to decline to include an acquisition adjustment in

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FPSC-RECORDS/REPORTING

rate base and approve Ocala Oaks Utilities, Inc's request to impose its current water rates, charges, classifications, rules and regulations, and service availability policies are preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

BACKGROUND

A. P. Utilities, Inc. (APU, seller, or utility), is a Class B utility serving approximately 1,200 residential customers in Marion County. Certificate No. 380-W was transferred to A. P. Utilities, Inc. by Order No. 21762, issued August 21, 1989, in Docket No. 881603-WU. The utility's 1997 annual report lists annual revenues of \$219,215 and operating expenses of \$200,051, resulting in net operating income of \$19,164.

By Order No. 21762, issued August 21, 1989, in Docket No. 881603-WU, we approved the transfer of Certificate No. 380-W from North Central Florida Utilities, Inc. to APU. On November 30, 1990, Mr. Philip Woods purchased the assets of APU from Mr. Michael Blake, and by Order No. 24977, issued August 26, 1991, in Docket No. 910117-WU, we approved the transfer of majority organizational control. The purchase also included the Aqua Pure Water Company (Aqua Pure) and Marico Properties, Inc. (Marico). By Order No. 25063, issued September 13, 1991, in Docket No. 910119-WU, we approved the transfer of assets from Marico to APU, and by Order No. 25075, issued September 17, 1991, in Docket No. 910118-WU, we approved the transfer of assets from Aqua Pure to APU.

Since the transfer of assets of APU to Philip Woods, the utility has failed to correct deficiencies in its 1993 annual report, failed to timely file its 1994, 1995, 1996 and 1997 annual reports, failed to file its 1998 annual report, and failed to pay its regulatory assessment fees (RAFs) for each of the years 1991 through 1998. Therefore, we have repeatedly ordered the utility to show cause for failure to pay RAFs and file or correct deficiencies to annual reports.

For example, by Order No. PSC-98-1005-SC-WU, issued July 24, 1998, in Dockets Nos. 980729-WU and 971504-WU, APU was ordered to show cause, in writing, within 20 days, why it should not remit a penalty in the amount of \$3,037.50 for failure to correct deficiencies in its 1996 annual report, and why it should not remit a penalty of \$2,198.49 and interest in the amount of \$439.70 for

failure to remit 1997 RAFs. In addition, the order required APU to immediately remit \$10,992.47 in delinquent RAFs for 1997. APU failed to file a timely response to this order to show cause, and the penalties and interest set forth in that order were recorded as a statutory lien pursuant to Chapter 85, Florida Statutes, on the real and personal property of A.P. Utilities, Inc., and its directors, Philip and Joan Woods. Further, pursuant to Section 55.10, Florida Statutes, that same order was recorded as a lien on the real and personal property of A.P. Utilities, Inc., and its directors, for the amount of the utility's delinquent regulatory assessment fees being duly recorded with the Clerk of the County Court in Marion County, Florida. The liens total \$16,668.16 (RAFs: \$10,992.47; penalty and interest: \$5,675.69).

The utility was also investigated for potential overearnings. By Order No. PSC-98-0044-PCO-WU, issued January 6, 1998, in Docket No. 971504-WU, we initiated an investigation into APU's rates and charges for potential overearnings. By that order, we required APU to hold its revenues subject to refund pending our investigation of the utility's possible overearnings, and provide security in the form of a bond, letter of credit or escrow agreement to guarantee any potential refund of its revenues.

Mr. Woods informed our staff that he was interested in leaving the utility business. He indicated having a pending contract to transfer two of the APU systems, 49th Street and Hawks Point, to Ocala Oaks Utilities, Inc. (Ocala Oaks or buyer) and he was in negotiations with Marion County for the sale of three other systems, Raven Hill, South Oak, and Peppertree. The sixth and final system, Quail Run, was not included in either sale.

Before we could consider any applications for transfer of systems from APU, the utility's outstanding RAFs, penalties, interest and annual report penalties, as well as potential overearnings, had to be addressed. By Order No. PSC-99-1459-PAA-WU, issued July 27, 1999, in Docket No. 971504-WU, we approved a settlement offer from Mr. Woods, which resolved all outstanding RAF payments, associated penalties and interest and penalties for failure to file or correct deficiencies to annual reports. By that order, we also approved the release of the overearnings escrow account to apply funds in that account toward payment of past RAF and annual report liabilities. The settlement requires certain payment from the proceeds of the sale of APU to Ocala Oaks, which will be addressed later in this Order.

On August 14, 1998, APU submitted an application for transfer of two of its six water systems to Ocala Oaks, holder of Certificate No. 346-W. Ocala Oaks is a Class B utility, serving approximately 1,409 residential customers in Marion County. Ocala Oaks' 1998 annual report lists annual revenue of \$376,252 and operating expenses of \$282,280, resulting in a net operating income of \$26,659. The two water systems to be transferred are 49th Street Village Water System with 98 customers and Hawk's Point Water System with 124 customers. A special clause to the contract for purchase of the two systems is that the contract is contingent upon the Commission authorizing the buyer to levy its current rates and charges on the two acquired systems.

On August 14, 1998, Ocala Oaks submitted an application for limited proceeding to impose its current water rates, charges, classifications, rules and regulations, and service availability policies on the two transferred systems. Because the sale is contingent upon our approval of this application, both dockets were considered together.

A customer meeting was held between the two service areas in Ocala, Florida, on November 4, 1998. A total of fifteen customers attended the meeting, with one from the 49th Street system and fourteen from the Hawks Point system.

APPLICATION

The application is in compliance with the governing statute, Section 367.071, Florida Statutes, and other pertinent statutes and administrative rules concerning an application for transfer. The application contains a check in the amount of \$750, which is the correct filing fee pursuant to Rule 25-30.020, Florida Administrative Code. The applicant has provided evidence, in the form of a warranty deed, that the utility owns the land upon which the utility's facilities are located as required by Rule 25-30.037(2)(q), Florida Administrative Code.

In addition, the application contains proof of compliance with the noticing provisions set forth in Rule 25-30.030, Florida Administrative Code. No objections to the application were received, and the time for the filing of such objections has expired. A description of the territory being transferred is appended to this Order as Attachment A.

The application contains a statement of how the transfer is in the public interest, pursuant to Rule 25-30.037(j), Florida Administrative Code. The statement indicates that APU no longer desires to be in the water utility business. It also provides that Ocala Oaks has been in existence since 1977 and certificated since December 23, 1981, and has the financial ability to provide service to these systems as demonstrated in its annual reports. We contacted the Department of Environmental Protection and learned that there are no outstanding notices of violation against the utility.

The application contains a copy of the contract for sale which includes the purchase price, terms of payment and a list of the assets purchased and liabilities assumed. Based on the application, there are no guaranteed revenue contracts or customer advances. The seller will remain responsible for the existing debts of the utility with the exception of an existing mortgage in the amount of approximately \$97,122 which the buyer will assume. The buyer has agreed to be responsible for payment of the 1999 RAFs. The buyer shall provide us written confirmation of the transfer closing within 60 days of the closing.

No customer deposits will be transferred to the buyer, because the seller refunded them to the customers of these two systems in September and October, 1998. Ocala Oaks has provided a statement that it will fulfill the commitments, obligations, and representations of the seller. Additionally, the buyer has stated that it will maintain and operate the system in compliance with all appropriate laws and rules.

As previously discussed, APU developed an extensive history of unfiled annual reports and unpaid RAFs, which lead to penalties and interest being assessed against the utility. In addition, liens totaling \$16,668.16 were filed on the utility's and Mr. and Mrs. Woods' properties based upon the utility's failure to pay 1997 RAFs and for failure to correct deficiencies to its 1996 annual report. On July 6, 1999, we approved a settlement offer from Mr. Woods. Pursuant to Order No. PSC-99-1459-PAA-WU, we approved the release of APU's overearnings escrow account to be applied toward payment That escrow account totals the aforementioned liens. of \$14,194.41. The settlement order also provided that proceeds from the sale to Ocala Oaks shall be applied to the outstanding balance owed for the liens.

Subtracting the escrow funds from the liens leaves an outstanding balance of \$2,473.75. The purchase price of \$103,561.05 less mortgage assumed by the buyer of approximately \$97,122.10, leaves proceeds of the sale in the amount of approximately \$6,428.95. Therefore, APU shall apply \$2,473.75 from the proceeds of the sale to Ocala Oaks toward payment of the liens on APU's and Mr. and Mrs. Woods' property. Upon satisfaction of these liens, APU's outstanding RAF and annual report penalty balance will total \$34,584.89, which, pursuant to the settlement order, will be paid from an upcoming sale of additional APU systems to Marion County. An application for transfer of APU systems to Marion County will be docketed in the near future.

Based on the above, we find that the transfer of assets and facilities from A. P. Utilities, Inc., to Ocala Oaks Utilities, Inc., the amendment of Water Certificate No. 380-W to remove the two transferred systems, and the amendment of Water Certificate No. 346-W to add the two transferred systems, is in the public interest. The transfer is hereby approved contingent upon receipt of written confirmation of the sale, which shall be submitted within 60 days of the closing, and satisfaction of the liens within 30 days of this Order.

RATE BASE

According to the application, the net book value of the two systems being transferred as of the date of the application was \$108,263. Ocala Oaks proposed a rate base for Hawks Point of \$69,814, based upon Docket No. 881603-WU, and for 49th Street of \$38,449, based upon Docket No. 910116-WU. The rate base for 49th Street was established based upon an original cost study performed However, the application failed to subtract the by our staff. \$7,000 land value from the rate base before calculating for current In making this correction, the current rate base for 49th Street is \$39,674. Also, the rate base for Hawks Point was established based upon information which was subsequently believed to be unreliable. Therefore, our staff performed an original cost study in September 1998. The rate base determined for Hawks Point was \$91,686.

A reliable audit could not be performed on the books and records of APU due to the fact that it failed to maintain them in compliance with the 1994 NARUC USOA, as required by Rules 25-30.115, Florida Administrative Code. Because the owner is in the process of selling the systems that make up APU, we are not

requiring the utility to maintain its records as required by Rules 25-30.115, Florida Administrative Code. However, because APU does not have a buyer identified for the Quail Run system, APU shall be required to establish its books and records in compliance with the NARUC USOA, if APU does not have a contract pending for the system by December 31, 1999.

Based on the foregoing, we find that rate base for transfer purposes shall be \$39,674 for 49th Street and \$91,686 for Hawks Point for a total of \$131,360, as shown on Schedule No. 1. A synopsis of our adjustments is shown on Schedule No. 2. The rate base calculation is used solely to establish the net book value of the property being transferred and does not include the normal ratemaking adjustments of working capital calculations and used and useful adjustments.

ACQUISITION ADJUSTMENT

An acquisition adjustment results when the purchase price differs from the original cost calculation adjusted to the time of the acquisition. The acquisition adjustment resulting from the transfer would be calculated as follows:

Purchase Price \$103,561

Commission Approved rate base \$131,360

Negative Acquisition adjustment \$ 27,799

In the absence of extraordinary circumstances, it is Commission policy that a subsequent purchase of a utility system at a premium or discount shall not affect the rate base calculation. Because the circumstances in this exchange do not appear to be extraordinary, and an acquisition adjustment was not requested by the applicant, no acquisition adjustment is included in rate base.

LIMITED PROCEEDING

Ocala Oaks' approved rates were effective November 27, 1998, pursuant to a price index for 1998 and pass-through of ad valorem taxes. Service availability charges were effective August 6, 1996, pursuant to an application for rate increase filed in Docket No. 960408-WU.

On August 14, 1998, Ocala Oaks submitted an application for limited proceeding to impose its current water rates, charges, classifications, rules and regulations, and service availability policies on the two transferred systems. Enclosed with the request was a check in the amount of \$500 pursuant to Sections 367.0822 and 367.145, Florida Statutes, and Rule 25-30.020, Florida Administrative Code.

Rule 25-9.044(1), Florida Administrative Code, provides that:

In cases of change of ownership or control of a utility which places the operation under a different or new utility...the company which will thereafter operate the utility business must adopt and use the rates, classification and regulations of the former operating company (unless authorized to change by the Commission).

Ocala Oaks has requested through the limited proceeding process that the rates of the 49th Street and Hawks Point systems be changed to those approved for the other systems it owns in Marion County.

The rates for 49th Street and Hawks Point were effective pursuant to Order No. 24977, issued February 11, 1992. Because these rates have not been adjusted in over seven years, they are artificially low and non-reflective of rates needed to keep a business running properly. In fact, as discussed previously, Mr. Woods did not pay any RAFs until 1998, when he decided to leave the utility business. According to the January 1, 1999 Comparative Cost Statistics, these rates are very low for the County, with only three out of fourteen water-only utilities having rates lower than those of APU.

Ocala Oaks provided information in support of its request to increase the 49th Street and Hawks Point rates to those of Ocala Oaks. A projection of the revenue increase which would be necessary to support the two systems on a "stand alone" basis with positive earnings indicates that rates would be higher than the proposed Ocala Oaks rates. We project a 400% increase in revenue in order to put the two systems on a stand-alone make-whole basis. We note that the revenue requirement used for calculating stand alone rates is an estimate of personnel and general operating expenses. Calculating the "true" revenue requirement for the stand alone systems would entail the filing of a rate case. A comparison

of the rates of APU, Ocala Oaks, and a stand alone utility is provided in Schedule No. 3.

A total of fifteen customers attended the November 4, 1998, meeting, with one from the 49th Street system and fourteen from the Hawks Point system. Seven customers spoke at the meeting. Many of the customers indicated that they were on fixed incomes and would have trouble paying higher bills. The customers believed they received adequate service from APU; however, as the discussion proceeded, several customers expressed concern about sediment in the water, varying quality of the water and low water pressure. The customers were informed about the buyer's intent to replace the Hawks Point generator and to work on the water pressure issue as initial areas of concentration upon the transfer of the two systems.

An increase in rates is always a concern of this Commission; however, we do not believe there are many reliable options for the two systems. The current owner intends to leave the utility business. Maintaining the systems as stand-alone utilities would potentially result in much higher rates to the customers than those of Ocala Oaks. Approval of the transfer to Ocala Oaks results in two systems being acquired by a larger, financially secure and operationally sound utility. Also, Ocala Oaks will have a more stable and diverse customer base and, through economies of scale, be better able to soften future rate shock in the long run, as opposed to maintaining the systems as stand-alone utilities.

Based on the above, Ocala Oaks request to implement its rates and charges, classifications, rules, regulations and service availability policies on the 49th Street and Hawks Point water systems is hereby approved. Ocala Oaks shall file tariff sheets consistent with our decision within 30 days of the transfer, if no timely protests are received. The tariff shall be effective for services provided or connections made on or after the stamped approval date, in accordance with Rule 25-30.475, Florida Administrative Code, provided the customers have received notice.

This docket shall remain open for an additional three months to allow our staff to verify release of APU's liens and to verify that Ocala Oaks has submitted proof of the closing and the necessary tariff sheets. If no timely protest is received to the proposed agency action issues, upon expiration of the protest period, the order shall become final and effective upon the issuance of a consummating order. Once proof of the closing,

tariffs and release of liens has been submitted, these dockets shall be closed administratively.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that the transfer of the 49th Street and Hawks Point water systems from A. P. Utilities, Inc., 3925 S.E. 45th Court, Suite E, Ocala, Florida 34480 to Ocala Oaks Utilities, Inc., 1343 N.E. 17th Road, Ocala, Florida 34470, is hereby approved. It is further

ORDERED that the transfer of facilities from A.P. Utilities, Inc. to Ocala Oaks Utilities, Inc. is approved contingent upon receipt of written confirmation of the sale, which shall be submitted within 60 days of the closing, and satisfaction of the liens within 30 days of this Order. It is further

ORDERED that all matters contained in the schedules and attachment to this Order are, by reference, incorporated herein. It is further

ORDERED that A.P. Utilities, Inc. shall be required to establish its books and records in compliance with the National Regulatory Utility Commissioners Uniform System of Accounts, if A.P. Utilities, Inc. does not have a contract pending for its Quail Run system by December 31, 1999. It is further

ORDERED that A.P. Utilities, Inc. shall apply \$2,473.75 from the proceeds of the sale to Ocala Oaks Utilities, Inc. toward payment of the liens filed by the Commission in Dockets Nos. 971504-WU and 980729-WU. It is further

ORDERED that rate base for transfer purposes shall be \$39,674 for 49th Street and \$91,686 for Hawks Point for a total of \$131,360. It is further

ORDERED that an acquisition adjustment shall not be approved in this docket. It is further

ORDERED that Ocala Oaks Utilities, Inc.'s request to impose its current water rates, charges, classifications, rules and regulations, and service availability policies on the 49th Street and Hawks Point water systems is hereby approved. It is further

ORDERED that Ocala Oaks Utilities, Inc. shall file tariff sheets consistent with our decision within 30 days of the transfer, if no timely protests are received. The tariff shall be effective for services provided or connections made on or after the stamped approval date, in accordance with Rule 25-30.475, Florida Administrative Code, provided the customers have received notice. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that if no timely protest is received to the proposed agency action issues, upon expiration of the protest period, the order shall become final and effective upon the issuance of a consummating order. Once proof of the closing, tariffs and release of liens has been submitted, these dockets shall be closed administratively.

By ORDER of the Florida Public Service Commission this <u>28th</u> day of <u>September</u>, <u>1999</u>.

BLANCA S. BAYÓ, Director

Division of Records and Reporting

(SEAL)

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Commissioner J. Terry Deason dissented from the Commission's decision in this docket to not approve an acquisition adjustment to rate base.

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

As identified in the body of this order, our actions to approve rate base for the purposes of transfer, to decline to include an acquisition adjustment are rate base and to approve to Ocala Oaks Utilities, Inc's request to impose its current water rates, charges, classifications, rules and regulations, and service availability policies are preliminary in nature. Any person whose substantial interests are affected by the actions proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. petition must be received by the Director, Division of Records and Reporting, at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on October 19, 1999. a petition is filed, mediation may be available on a case-by-case If mediation is conducted, it does not affect a basis. substantially interested person's right to a hearing. absence of such a petition, this order shall become effective and final upon the issuance of a Consummating Order.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

Any party adversely affected by the Commission's final action in this matter may request: (1) reconsideration of the decision by filing a motion for reconsideration with the Director, Division of Records and Reporting within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or (2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water or wastewater utility by filing a notice of appeal with the Director, Division of Records and Reporting and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be

completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

ATTACHMENT A

OCALA OAKS UTILITIES, INC.

WATER SERVICE AREA

MARION COUNTY

HAWKS POINT SUBDIVISION

The SE 1/4 of Section 26, Township 16 South, Range 22 East, Marion County, Florida: Less and Except the East 12 1/2 chains thereof, and Less the North 10 chains thereof: and Except the West 1/2 of the SW 1/4 of the SE 1/4, and Except the SE 1/4 of the SW 1/4 of the SE 1/4, Except the East 30 feet.

THE SUBDIVISIONS OF 49TH STREET VILLAGE, STONEGATE AND COUNTRY ROADS

The following described lands located in portions of Sections 27 and 34, Township 14 South, Range 22 East, Marion County, Florida:

Section 27

The South 1/2 of the SW 1/4 of the SW 1/4

Section 34

The North 1/4 of the NW 1/4 The SW 1/4 of the NE 1/4 of the NW 1/4

SCHEDULE NO. 1

49TH STREET AND HAWKS POINT SCHEDULE OF WATER SYSTEMS RATE BASE AS OF SEPTEMBER, 1998

DESCRIPTION	BALANCE PER APPLICANT	COMMISSION ADJUSTMENTS	BALANCE PER COMMISSION
Utility Plant in Service 49th Street Hawks Point	\$75,641 117,598	(\$7,000)(1) 23,964(2)	\$68,641 141,562
Land 49th Street Hawks Point	0 0	\$7,000(3) 6,000(4)	\$7,000 6,000
Accumulated Depreciation 49th Street Hawks Point	(13,237) (23,759)	1,225(5) (8,092)(6)	•
Contributions-in- aid-of-Construction 49th Street Hawks Point	(29,036) (31,000)	0	(29,036) (31,000)
Amortization of Accumulated CIAC 49th Street Hawks Point	5,081 <u>6,975</u>	0 0	5,081 6,975
TOTAL	<u>\$108,263</u>	<u>\$23,097</u>	<u>\$131,360</u>

SCHEDULE 2

49TH STREET AND HAWKS POINT SCHEDULE OF WATER SYSTEMS RATE BASE ADJUSTMENTS (Numbers in parentheses refer to Staff Adjustments on Schedule 1)

	EXPLANATION	ADJUSTMENT		
	ity Plant in Service 49th Street - Land value deducted(1) Hawks Point - New original cost study(2) Total	(\$7,000) 23,964 16,964		
Land 1. 2.	49th Street - Land value added(3) Hawks Point - Land value added(4) Total	7,000 <u>6,000</u> 13,000		
Accumulated Depreciation 1. 49th Street - Removed depreciated land value(5) 1,225 2. Hawks Point - Adjusted for new original cost study(6)(8,092) Total (6,867)				
	TOTAL ADJUSTMENT	<u>\$23,097</u>		

SCHEDULE NO. 3

49TH STREET AND HAWKS POINT SCHEDULE OF SAMPLE WATER BILLS AS OF SEPTEMBER, 1998

DESCRIPTION	EXISTING AP RATES	PSC ESTIMATED STAND ALONE	EXISTING OCALA OAKS
5/8x3/4" Base Facility Cl	harge \$5.67	\$28.31	\$13.11
Gallonage Charge	\$1.06/1,000	\$1.06/1,000	\$1.12/1,000
Monthly Bill at 6,000 Gallons 7,600 Gallons 8,000 Gallons	\$12.73 13.73 14.15	\$34.67 36.36 36.79	\$19.83 21.62 22.07