

August 11, 2020

Ms. Kathryn Cowdery
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: *Docket No. 20200199-WS – Proposed amendment of Rules 25-30.335, F.A.C. – Customer Billing*

Dear Ms. Cowdery,

In response to the Commission data request dated August 5, 2020 in the above referenced docket (Customer Billing), I respectfully submit the following comments.

I am the Vice President of Investor Owned Utilities representing the following utilities, hereafter referenced as “**Collective Utilities**” regulated by the Florida Public Service Commission:

Black Bear Waterworks, Inc.
Brendenwood Waterworks, Inc.
Brevard Waterworks, Inc.
Country Walk Utilities, Inc.
Duval Waterworks, Inc.
Gator Waterworks, Inc.
Harbor Waterworks, Inc.
HC Waterworks, Inc.
Jumper Creek Utility Company
Lake Idlewild Utility Company
Lake Talquin Waterworks, Inc.
Lakeside Waterworks, Inc.
LP Waterworks, Inc.
Merritt Island Utility Company
North Charlotte Waterworks, Inc.
Okaloosa Waterworks, Inc.
Pine Harbour Waterworks, Inc.
Raintree Waterworks, Inc.
Royal Waterworks, Inc.
Seminole Waterworks, Inc.
Sunny Hills Utility Company
The Woods Utility Company

Collective Utilities submits that the historical industry practice throughout Florida has been based upon a twelve (12) month period of discontinued service. Due to the transient nature of typical “snow bird” customers, some customers may be outside the State of Florida for more than six months. The attached tariff sheets of the largest investor-owned water and wastewater utility, Aqua Utilities Florida provides documentation that the Florida Public Service Commission has previously approved this twelve month period. See Water Tariff Sheet No. 3.5 and Wastewater Tariff Sheet No. 3.5. Both of these tariffs were approved by the FPSC staff on March 26, 2007. These historic tariffs state:

TEMPORARY DISCONTINUANCE OF SERVICE – If service is terminated and resumed at the same address to the same Customer within twelve (12) months or less from the date of termination, a monthly standby charge equivalent to the Base Facility Charge will be collected by the Company as a condition precedent to restoration of service to that Customer. If the Base Facility rate structure is not in effect, one half of the approved minimum bill will be charged for each billing period. The standby charge will be collected for each month, not to exceed twelve (12) months.

This has been the standard industry-wide practice for water & wastewater utilities. The Collective Utilities above have been abiding by this practice since inception of the various utilities. To shorten this period of time would be burdensome and could result in lost revenues which would be borne by the remaining general body of ratepayers. Collective Utilities believes this would be discriminatory towards full time customers who do not leave the state. The majority of the utilities listed above do have Miscellaneous Service Charges including reconnection charges. These charges are designed to recover the cost (labor, truck, gas, etc.) of two trips to the customer’s residence. One trip to disconnect the customer and one trip to reconnect the customer. There are also administrative costs related to the account record keeping.

Collective Utilities attempted to compile the requested data; unfortunately its outside contractor could not obtain the specific information requested. They could not find a way to quantify the counts. However, the contractor stated they believe this occurs once or twice a month.

Thank you for your consideration, and if you have any questions, please do not hesitate to contact me at (727) 848-8292, ext. 245, or via e-mail at trendell@uswatercorp.net.

Respectfully submitted,



Troy Rendell
Vice President
Investor Owned Utilities

RULES AND REGULATIONS

(Continued from Section III Sheet No. 3.4)

- 27.0 **DELINQUENT BILLS** - Bills for water service are due when rendered. However, the Company shall not consider the Customer delinquent in paying any bill until the twenty-first (21) day after the Company has mailed or presented the bill to the Customer for payment. Water service may then be discontinued only after the Company has mailed or presented within five (5) working days a written notice to the Customer in accordance with Rule 25-30.320, Florida Administrative Code. Water service shall be restored only after the Company has received payment for all past-due bills and penalties, and reconnect charges from the Customer.

There shall be no liability of any kind against the Company for the discontinuance of water service to a Customer for that Customer's failure to pay the bills on time.

- 28.0 **NO PARTIAL PAYMENT** - Partial payment of a bill for water service rendered will not be accepted by the Company, except by the Company's agreement thereof or by direct order from the Commission.

- 29.0 **PAYMENT OF WATER AND WASTEWATER SERVICE BILLS CONCURRENTLY** - When both water and wastewater service are provided by the Company, payment of any water service bill rendered by the Company to a Customer shall not be accepted by the Company without the simultaneous or concurrent payment of any wastewater service bill rendered by the Company. The Company may discontinue both water service and wastewater service to the Customer's premises for non-payment of the water service bill or wastewater service bill or if payment is not made concurrently.

The Company shall not reestablish or reconnect water service and/or wastewater service until such time as all water and wastewater service charges and all the other expenses or charges established or provided for by these Rules and Regulations are paid.

- 30.0 **TEMPORARY DISCONTINUANCE OF SERVICE** - If service is terminated and resumed at the same address to the same Customer within twelve (12) months or less from the date of termination, a monthly standby charge equivalent to the Base Facility Charge, will be collected by the Company as a condition precedent to restoration of service to that Customer. If the Base Facility rate structure is not in effect, one half of the approved minimum bill will be charged for each billing period. The standby charge will be collected for each month, not to exceed twelve (12) months.

During a period that service is not being furnished to the premises, upon application to the Company by the Customer, as confirmed by the Company, a standby charge will be made.

(Continued to Section III Sheet No. 3.6)

FLORIDA PUBLIC SERVICE COMMISSION

APPROVED

AUTHORITY NO. WS-06-0103

DOCKET NO. 060643-WS

ORDER NO. PSC-06-0973-FOF-WS

EFFECTIVE: March 26, 2007

Tim Devlin

DIRECTOR
DIVISION OF ECONOMIC AND REGULATION

RULES AND REGULATIONS (Cont.)

(Continued from Section III Sheet No. 3.4)

- 28.0 **PAYMENT OF WATER AND WASTEWATER SERVICE BILLS CONCURRENTLY** - When both water and wastewater service are provided by the Company, payment of any water service bill rendered by the Company to a customer shall not be accepted by the Company without the simultaneous or concurrent payment of any wastewater service bill rendered by the Company. The Company may discontinue both water service and wastewater service to the Customer's premises for non-payment of the water service bill or wastewater service bill or if payment is not made concurrently.

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During a period that service is not being furnished to the premises, upon application to the Company by the Customer, as confirmed by the Company, a standby charge will be made.

- 30.0 **CHANGE OF OCCUPANCY** - When a change of occupancy takes place on any premises supplied by the Company with wastewater service, written notice thereof shall be given at the office of the Company not less than three (3) days prior to the date of change by the outgoing Customer. The outgoing Customer shall be held responsible for all wastewater service used on such premises until such written notice is so received by the Company and the Company has had reasonable time to discontinue the wastewater service. However, if such written notice has not been received, the application of a succeeding occupant for wastewater service will automatically terminate the prior account. The Customer's deposit may be transferred from one service location to another, if both locations are supplied wastewater service by the Company; the Customer's deposit may not be transferred from one name to another.

Notwithstanding the above, the Company will accept telephone orders, for the convenience of its Customers, to discontinue or transfer wastewater service from one service address to another and will use all reasonable diligence in the execution thereof. However, oral orders or advice shall not be deemed binding or be considered formal notification to the Company.

(Continued to Section III Sheet No. 3.6)

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