

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for an increase in water and
wastewater rates in Charlotte, Highlands, Lake,
Lee, Marion, Orange, Pasco, Pinellas, Polk,
and Seminole Counties by Utilities, Inc. of Florida

Docket No. 20200139-WS

REBUTTAL TESTIMONY

OF

CHRIS SNOW

on behalf of

Utilities, Inc. of Florida

1 **Q. Please state your, name profession and address.**

2 A. My name is Chris Snow. I am Director of External Affairs for Utilities, Inc. of Florida. My
3 business address is 200 Weathersfield Ave., Altamonte Springs, Florida, 32714.

4 **Q. Please briefly state your educational background and experience.**

5 A. I received a Bachelor of Arts degree from Florida State University in social science in
6 2004. Prior to my work at Utilities, Inc. of Florida (UIF) I worked 10 years for the quasi-
7 government agency Space Florida both as the Director of Government Affairs but also as
8 a Director of Business Development, managing community affairs. Before then I worked
9 in Washington, D.C. on Capitol Hill and at a trade association analyzing and as an advocate
10 for legislative policy.

11 **Q. Have you previously pre-filed direct testimony in this proceeding?**

12 A. No.

13 **Q. What is the purpose of your rebuttal testimony?**

14 A. The purpose of my rebuttal testimony is to primarily address the pre-filed testimony of
15 OPC witnesses Lewis and Crane.

16 **Q. Do you agree with OPC witness Lewis' findings when it comes to billing complaints?**

17 A. No, I do not. The procedure of UIF for a high-bill complaint involves checking with the
18 customer to see if there could be a leak. If there is a leak, we have instituted a leak
19 adjustment policy to reduce the customer's bill to help them through that challenge. If it is
20 not a leak, we work with them to determine whether there is a meter malfunction by means
21 of re-reading the meter and/or a meter test to determine its accuracy. We work with each
22 customer individually to address each of their concerns.

23 **Q. Do you agree with OPC witness Lewis in regard to customer Dana Elliot's comments?**

24 A. No, UIF has not received a complaint from Ms. Elliot about her water quality in the more

1 than 14 years she has been a customer. As with all customers, we are more than happy to
2 investigate individual customers concerns first to try to address them but second to assure
3 there isn't a larger systemic issue involved.

4 We are aware of iron levels in the water at our Pennbrooke system. This is a function of the
5 source groundwater containing a significant concentration of iron. UIF adds an iron
6 sequestrant as part of the water treatment process to keep the iron in solution. We previously
7 investigated treatment alternatives with the Pennbrooke Homeowners Association after they
8 expressed interest in UIF making specific additional investments to remove iron from the
9 water. The Pennbrooke Homeowners Associations declined to support the treatment upgrade
10 due to the prospective impact on their water bill.

11 **Q. Do you agree with OPC witness Lewis in regard to customer Russakov's comments?**

12 A. No, UIF has not received a complaint about water quality from Ms. Russakov in the
13 approximately 20 years she has been a customer. We are happy to investigate the customer's
14 concerns but are happy to hear she hasn't had any in more than a year.

15 **Q. Do you agree with OPC witness Lewis in regard to customer Saylor's comments?**

16 A. No, UIF has not received a complaint about water quality in the time Mr. Saylor has been a
17 customer. Again, as a customer of Pennbrooke the source water is high in iron content, as
18 previously mentioned, which correlates with Mr. Saylor's concerns. The water quality in
19 Pennbrooke routinely meets all DEP standards and requirements. We are happy to work with
20 Mr. Saylor to resolve his individual concerns.

21 In regard to his billing concerns, we offer irrigation audits for our customers and are happy
22 to provide information on how he can save money by reducing his water usage. For instance,
23 over the last two years Mr. Saylor has averaged 16,000 gallons of water per month. We
24 typically find that irrigation is the primary driver of high water usage. We offer free irrigation

1 audits as well as information on our website on how to conserve water as provided by the St.
2 Johns River Water Management District including guidelines for watering. The District's
3 guidance may help Mr. Saylor and others conserve water and reduce their bills.

4 **Q. Do you agree with OPC witness Lewis that Utilities, Inc. of Florida did not respond to**
5 **complaints until after the customer reached out to the Public Service Commission?**

6 A. No, when customers contact us, we respond via phone, email, or social media messages. We
7 are happy to respond to each customer concern brought to us. Sometimes customers choose
8 to contact the Public Service Commission before reaching out to us, but that is their choice
9 as a consumer. If there are specific instances that Ms. Lewis is referring to, we would be
10 happy to address them individually.

11 **Q. Do you agree with OPC witness Crane's testimony about lobbying costs in your revenue**
12 **requirement claim?**

13 A: No, I do not. In response to OPC Interrogatory 34 we were asked to identify any organization
14 that is involved in lobbying activity. We did so. However, in Interrogatory 140 we were asked
15 to show the total payments to these entities that related to lobbying activities which is simply
16 \$45,827.13 to the Gunster law firm. The lobbying activity was related to the passage of Fair
17 Market Value legislation which not only benefits UIF but also the customer. First, the
18 acquisition of underfunded systems would benefit the customers of those systems by virtue
19 of UIF offering robust financial and operational resources. Additionally, the legislation, if
20 enacted, would help our current customers by allowing us to spread individual system costs
21 over a larger customer base thus achieving economies of scale for the systems acquired. This
22 would reduce the cost to each individual customer similar to the economies of scale realized
23 by the electric and gas industries in Florida.

1 UIF is a member of other organizations that offer training, certification, technology
2 information and strategic planning resources, all of which are beneficial to the customers by
3 assisting in UIF's mandate to provide safe and reliable service.

4 **Q. Do you agree with OPC witness Hicks that Utilities, Inc. of Florida that the potential**
5 **rule violations for lack of responding to customers in a timely manner is a current**
6 **problem?**

7 **A:** No, I do not. In reviewing the PSC complaints pointed out by OPC witness Hicks I found
8 that these four potential rule violations were from 2015, 2017, and 2018. There are none from
9 2019 or 2020. We work diligently to assure we are responding to the customer, and PSC, in
10 a thorough and expedient manner. We have a team that handles PSC complaints that come
11 in and we have reorganized our Customer Experience department to prioritize the customer.
12 Additionally, we strive to provide information to the customer in their preferred method. To
13 that end, UIF now provides customer information and feedback on Facebook, Twitter,
14 Google and through our app/webportal MyUtilityConnect.

15 **Q. Do you agree with the assessment made by your customer, Mr. David Joswick, during**
16 **the December 4th Service Hearing?**

17 **A:** No, I do not. Mr. David Joswick raised concerns in regard to UIF's customer service. Mr.
18 Joswick is correct in that he received an incorrect meter read in February of 2020. What he
19 did not mention in his testimony is that UIF apologized, reread the meter and corrected his
20 bill. The second item mentioned by Mr. Joswick is from November 30 of 2017 when he
21 called requesting UIF loosen the valve to allow him to turn off his water for repairs. UIF
22 visited his residence the next day and loosened the valve for the customer.

23 **Q. Does that conclude your direct testimony?**

24 **A.** Yes, it does.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-mail to the following parties this 14th day of December, 2020:

J. R. Kelly, Esquire
Stephanie Morse, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
morse.stephanie@leg.state.fl.us
kelly.jr@leg.state.fl.us

Jennifer Crawford, Esquire
Walter Trierweiler, Esquire
Bianca Lherisson, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
wtrierwe@psc.state.fl.us
jcrawfor@psc.state.fl.us
BLheriss@psc.state.fl.us

/s/ Martin S. Friedman

Martin S. Friedman