

August 3, 2022
via e filing

Adam Teitzman, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 20220032-WS – Application for staff-assisted rate case in Polk County by Anglers Cove West, Ltd.

Dear Mr. Teitzman:

The following are Anglers Cove West, Ltd.'s responses to Staff's Second Data Request dated July 19, 2022:

1. Please provide an estimate for rate case expense incurred through the Proposed Agency Action (PAA) process. Please include any estimated attorney's fees that will be incurred after the date of issuance of the Staff Report. – **See attached schedule.**
2. Please refer to the staff audit report, pages 12 and 13. The Utility balance for Salaries & Wages – Employees is \$29,117 for water and \$33,828 for wastewater. Please provide a detailed explanation of the duties and responsibilities of the employees. Please include the appropriate documentation and support for the salaries. - **The requested information was sent to Dale Buys on 7/26/22.**
3. Please refer to the Utility's response to Staff's First Data Request, No. 5. Please explain the increase in gallons purchased for the December bill (PDF page 29). – **The increase in the gallons purchased is due to the seasonality of our communities. We have many snowbirds, that leave for the summer months and return for the winter months. It is typical that the consumption rises in the winter months due to this.**
4. Please provide the following for the water meter replacement pro forma project:
 - a. Please provide a detailed explanation of the work performed for this project as listed in the Utility's response to Staff's First Data Request, No. 17, Attachment 1. - **The work has already been performed. The meters have all been replaced. The invoices and checks for payments have been provided. The final total for the project was \$101,957.76. This included parts and labor to remove the old meters and install the new meters.**
 - b. Please provide any documentation supporting the original cost for the meters that were replaced. **These were the original meters installed and we cannot find this documentation.**
 - c. Please explain each line item on the Empire Pipe & Supply Bid ID # 5014535 and the work performed. - **The details of the actual invoices are as follows:**

Invoice No. 2080373: Line 1 – Cost of a 5/8”x 3/4” meter ; Line 6 – Cost of a 2” Meter; Line 7 – Cost of a 1” meter

Invoice No. 2080374: Line 1 – Cost of a 5/8”x 3/4” meter ; Line 5 – Cost of a 1” meter

Invoice No. 2082546: Line 1 – The cost to change out a 5/8”x 3/4” meter (labor); Line 2 – The cost to change out a meter hot (without a curb stop to shut off water – Labor); Line 3 – Plumbing work – to install curb stops before the meter (we were charged for 25); Line 4 – The cost to change out a 1” meter (labor); Line 5 – The cost to change out a 2” meter (labor)

Invoice 2083951: Line 1 – The cost of curb stops (to allow us to shut water off before the meter at the home)

Invoice 2081664: Line 1 – Cost for a 3/4’x5/8” ball valve (parts used during meter replacement); Line 2 - Plumbing parts used for meter replacement; Line 3 - Meter Couplings - parts used during meter replacements.

- d. Please explain the inconsistency in the quantity of meters being replaced on the bid and the number of meters listed on page W-3 in the Utility’s 2021 Annual Report. (There are more meters being replaced than denoted in the Annual Report) – **There are currently 340 total residential water meters (5/8x3/4). The Annual Report states 338, so we will update the Annual Report to reflect the correct number of 340. 344 meters were purchased – the additional 4 meters were purchased to have as back-ups.**
 - e. Please explain why in the original application the Utility requested an amount of \$42,176.67 for replacement of 154, 5/8-inch meters and 3, 1-inch meters, but in its response to Staff’s First Data Request, No. 17, the cost increased to \$99,836.33 for replacement of ALL meters. – **This was not the only estimate provided. There was another estimate totaling \$52,436.07 that should have been included in addition to the other one. As mentioned before, the work has already been completed and has been detailed above. The total cost of the meter replacement project was \$101,957.76.**
 - f. Please refer to the Utility’s response to Staff’s First Data Request, No. 17, Attachment 1. Please indicate whether or not this project has been completed. If so, please provide the final invoice. If not, please provide the revised expected completion date.- **Yes, this project has been completed. Final Invoice and check submitted for payment have been provided.**
5. Please refer to the Utility’s response to Staff’s First Data Request, No. 17. Please explain how the Utility determined that the retention pond required repairs. – **There were serious erosion problems with the perc ponds (rapid infiltration basins). The ponds are right next to the wastewater plant. The erosion was creating voids next to the plant walls. There were concerns that further erosion of the sides of the ponds could create a serious problem with the walls of the plant by negatively impacting the structural integrity of the plant walls. The issues were easily recognizable in person.**
 - a. Please provide a more detailed explanation of the work performed for the retention pond refurbishment pro forma project. Please provide any supporting documentation for the cost of the various components of the project, i.e., permitting, engineering, and inspection that were not included in Estimate #22-425752 from

Corrosion Control. - Additional dirt was imported to rebuild the pond walls next to the plant walls. Approximately 400 yards of fill were brought in and compacted to rebuild the banks, provide support for the walls of the sewer plant and provide a safe walkway around the plant so that normal maintenance operations can be safely performed by the operator and vendors. Various size rock and gravel were added to the banks to create a stronger bank and prevent further erosion.

- b. Please provide an estimate of the life of the retention pond refurbishment, and identify how often does this work has to be performed. - We would estimate this should last at least 10 years or longer.
6. Please refer to the letter dated July 12, 2022, regarding necessary upgrades to the electronic meter reading equipment. Please explain how it was determined that the electronic meter reading equipment required upgrades. - It was necessary to upgrade parts of our reading system, as we were having trouble capturing all the readings and data from the meters. Our existing reading system has become outdated and does not function properly with the newer meters.
- a. Please provide a more detailed explanation of the work to be performed for the upgrades to the electronic meter reading equipment. As part of this response, please indicate whether equipment will be replaced. - The equipment being replaced is the receiver, charger, and reading antenna. We will also be switching to a new reading software. Since it is the new version it will allow our system to properly read and communicate with all of our meters. The new software will be integrated with our reading equipment and billing system and software. The staff will be trained on the new software and it will be fully integrated with all other aspects, as previously mentioned.
 - b. Please describe how replacing the water meters and upgrading the electronic meter reading equipment will affect the time required to read the meters and collect billing data. - The new water meters will allow us to automatically read them with the reading equipment by driving through the community. The reading equipment is placed in the vehicle and driven once through the community and will pick up the meter readings from the new meters as it gets near the meter. The data is then transmitted to our billing software. This will reduce the meter reading time significantly, as we have previously been reading the meters in person by walking from meter to meter and hand writing meter readings. The meter readings were sent to our billing dept. and entered by hand into the system.

Sincerely,
/s/ Brian Altman
Brian Altman

cc: Takira Thompson (via email)

Anglers Cove West, Ltd
Docket No. 20220032-WS
Estimated Rate Case Expense

- Estimated Attorney Fees from Staff Report through implementing PAA Order:

<u>Hours</u>	<u>Description</u>
1.0 hrs.	Review preliminary Staff Report and discuss with client
3.0 hrs.	Correspondence with Staff to provide additional information in response preliminary Staff Report, and to respond to miscellaneous Staff requests including those related to comments at the Customer Hearing
1.0 hrs.	Participate in virtual Customer Meeting and discuss with client afterwards
1.0 hrs.	Review Staff recommendation; Conference with client regarding recommendation;
2.5 hrs.	Travel to and from Tallahassee; Prepare for and attend Agenda conference, discuss outcome with client [This is the allocated amount split among all four SARCS so if they are not all heard at the same Agenda the amount will increase accordingly]
1.5 hrs.	Review PAA Order; conference with client and consultants regarding PAA Order.
2.0 hrs.	Prepare revised tariff sheets, obtain Staff approval of tariffs; Draft and revise customer notice, obtain Staff approval; Coordinate mailing of customer notices and implementation of tariffs and filing Affidavit; Prepare, review and filing of post-Order requirements
12 hrs. @ \$390/hr.	\$4,680.00 total estimated attorneys' fees

SUMMARY:

Filing Fee: \$2,000.00

Customer Notices (2): \$ 508.00¹

Estimated Legal Fees: \$ 4,680.00

Estimated Travel Expense to PSC Agenda:² \$ 150.00

TOTAL RATE CASE EXPENSE: \$ 7,338.00

¹ Approximately \$100 for envelopes and paper for the notices. Postage will be \$408 (340 homes x \$0.60 postage rate x 2 mailings).

² This is the allocated amount split among all four SARCS so if they are not all heard at the same Agenda the amount will increase accordingly