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**REBUTTAL TESTIMONY OF FORREST L. LUDSEN**  
**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**  
**ON BEHALF OF**  
**SOUTHERN STATES UTILITIES, INC.**  
**DOCKET NO. 930880-WS**

DOCUMENT SUBMITTED

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1 Q. ARE YOU THE SAME FORREST L. LUDSEN WHO  
2 PREVIOUSLY FILED DIRECT TESTIMONY?

3 A. Yes, I am.

4 Q. DO YOU BELIEVE THAT UNIFORM RATES RESULT IN  
5 IMPROPER SUBSIDIES?

6 A. No. The uniform rates are established based on the cost of serving the

7 Company's customers. The only difference between the uniform rates  
8 and the pseudo-stand alone rate alternative advocated by Intervenor's is  
9 the size of the customer base considered. Southern States has

10 presented what we believe to be overwhelming evidence confirming  
11 that our Company should be treated as one utility company and our

12 customers should be treated as one customer base -- not artificially  
13 disaggregated. Given the comprehensive integration of Southern

14 States' services and operations, any disaggregation of the related costs  
15 only could be accomplished by the application of any number of  
16 imperfect, theoretical allocation methodologies. No true cost of

17 service would result. Moreover, we do not believe that alleged cross-  
18 subsidies would cease to exist under the pseudo-stand alone rates that

19 Sugarmill Woods customers are advocating. The history of the

20 Company's progression toward uniform rates indicates to us that the

21 Commission, Public Counsel and COVA would oppose any increase

in the single "system" if, as a company, Southern States were achieving



1 the rate of return authorized by the Commission. For instance, if rates  
2 are set on a pseudo-stand alone basis and Southern States is losing  
3 money on a particular system, we could not obtain a rate increase  
4 from the Commission for that specific system if we, as a Company,  
5 were earning at or near to our previously authorized rate of return. It  
6 appears that Mr. Cicchetti now joins COVA in supporting such a  
7 result. Also, it must be noted that even if Southern States could  
8 obtain a single system increase, we believe that given past experience  
9 as a guide, the Commission would require us to file MFR data for all  
10 of our Commission regulated systems. Therefore, the rate case  
11 expense alone could be expected to discourage a filing designed to  
12 recover deficiencies from a single system, particularly if other  
13 "systems" are making up for the deficiency.

14 To substantiate our belief, I refer the Commission to Docket  
15 No. 900329-WS. In that proceeding, the Commission was concerned  
16 with Southern States' request for a rate increase for Sugarmill Woods  
17 and 33 other "systems" because all of Southern States' "systems" were  
18 not included in that docket. If the Commission is looking at Southern  
19 States as one utility with one revenue requirement for rate-setting  
20 purposes, the common sense approach to ratemaking would dictate  
21 that uniform rates, not pseudo stand alone rates are called for. For  
22 example, it appears that under Mr. Cicchetti's total Company revenue

1 requirement stand alone rate method, the Commission would refuse to  
2 provide Southern States rate relief for the Sugarmill Woods "system"  
3 (even after evidence confirms a revenue deficiency for that system) if,  
4 on a total Company basis, Southern States was earning its allowed rate  
5 of return. Such a result would create a "subsidy" to Sugarmill Woods  
6 customers. COVA participated in Docket No. 900329-WS and argued  
7 against the Commission's granting rate relief to Southern States for  
8 that system because other "systems" which might be over-earning  
9 were not included in that rate application. In its Brief and Post-  
10 Hearing Statement of Issues and Positions (page 14), COVA states as  
11 follows:

12 ... SSU's sole criterion in determining which  
13 systems to include in this filing was alleged  
14 revenue deficiency. This systemically biases the  
15 case to the detriment of the 34 included systems  
16 because it deprives the customers of these  
17 systems of any potential benefits -- for example,  
18 from better rate of return performance or lower  
19 overall cost to serve -- that the other 98  
20 jurisdictional systems would bring to a  
21 consolidated rate structure.

22 Q. DO YOU HAVE ANY COMMENTS REGARDING THE



1           **REPEATED EXPRESSIONS OF CONCERN ABOUT**  
2           **SUBSIDIES IN UTILITY RATES?**

3           A.    Yes. Any person with experience in utility ratemaking knows that  
4           some level of subsidy exists in every utility rate. It is apparent from  
5           the facts I just described, that under COVA's concept of future rate  
6           filings and also the proposals made by Mr. Cicchetti, the customers  
7           served by revenue deficient systems would be subsidized by customers  
8           served by all of our other systems. Subsidy would exist. The  
9           converse also is true. If, on a pseudo-stand alone basis, Southern  
10          States is exceeding its authorized rate of return from a particular  
11          "system," the customers served by that system would not be provided  
12          lower rates unless, on a Company-wide basis, Southern States was  
13          over-earning. In theory, the customers served by the over-earning  
14          "system" would be subsidizing all other customers. Subsidy would  
15          exist.

16                Some level of subsidy will continue to exist in every rate  
17          unless and until a separate cost of service study is performed and a  
18          separate rate is established for every individual customer. The  
19          frequent example is the customer whose house is located next to the  
20          treatment plant. Obviously, the cost of serving that customer is lower  
21          than the cost of serving a customer located ten or twenty miles from  
22          the plant. Yet, even where customer by customer cost of service

1 studies are performed and individual rates are established, such rates  
2 would be imprecise (thus resulting in a subsidy) unless every customer  
3 was charged the precise cost incurred by the utility for every specific  
4 service rendered on behalf of that customer -- for instance, every call  
5 made by that customer to a customer service representative.

6 Obviously, it would be ludicrous to suggest that such precision is  
7 necessary. In addition, even were such precision possible, common  
8 costs would need to be allocated. By definition, any allocation is not  
9 precise. The bottom line is that every rate ever set by any regulatory  
10 authority has some degree of subsidy inherent in it. As long as the  
11 Commission can make a determination of just and reasonable rates  
12 based on the facts presented, such subsidies are not improper.

13 **Q. DO YOU BELIEVE THAT UNIFORM RATES PROVIDE SOME**  
14 **CUSTOMERS WITH IMMEDIATE BENEFITS AT THE**  
15 **EXPENSE OF OTHER CUSTOMERS?**

16 **A.** No. I believe that all of Southern States' customers are receiving  
17 immediate benefits from being a part of a larger utility that is  
18 dedicated and staffed to provide utility service "only" and that uniform  
19 rates are the best way to recognize this fact. Given the extent of  
20 consolidation of the Company, I do not even believe it is appropriate  
21 to refer to "subsidiaries" between "systems" because Southern States'

22 water and wastewater facilities are operated as one, consolidated



1 system. Also, "subsidies" generally occur between customer classes,  
2 not within a single class of customers. All of the customers affected  
3 by the uniform rates are in one customer class, residential, and all of  
4 the customers receive essentially the same service. Also, any attempt  
5 to disaggregate the systems would be merely theoretical and, therefore,  
6 I believe that it is not correct to characterize uniform rates as  
7 providing subsidies between systems. However, I do not believe that  
8 the reasonableness of and justification for uniform rates hinges upon  
9 these semantics.

10 The critical facts are that SSU is a company which will  
11 be there to provide quality service into the future and is  
12 equipped and has the financial backing to meet the  
13 environmental challenges facing all water and wastewater  
14 utilities in Florida. I believe that Sugarmill Woods wants all  
15 the benefits and cost savings related to the quality of service  
16 being provided by a larger utility and, in addition, wants to  
17 single out additional costs which will benefit them. For  
18 example, Mr. Hansen, on pages 8-9 of his testimony and also  
19 in his related exhibit at page 7, indicates that Sugarmill Woods'  
20 previous parent, Punta Gorda Isles, was hit hard by inflation  
21 and deeply in debt and had no funds to pay staff proposed

... I would suggest that if I was a homeowner in

1 Sugarmill Woods, I would be concerned about my home value  
2 if I was not being served by a healthy utility that could assure  
3 service, let alone quality of service, into the future. Being  
4 served by a large utility does not necessarily mean cheap rates,  
5 but moderate rates with quality, value, security and service  
6 supporting those rates. Mr. Hansen should recognize that value  
7 and quality do not always come at the cheapest price having  
8 worked for the Pontiac Division of General Motors. I'm sure  
9 he recognizes that either a Pontiac or a Yugo could get you  
10 from Point A to Point B, but that it is probably worth paying  
11 more for the Pontiac because you know it is a good quality car  
12 and that General Motors will be there tomorrow to provide you  
13 service. In addition, it is worth paying more for the inherent  
14 value and extras you get in a Pontiac.

15 **Q. DO YOU AGREE WITH MR. CICCHETTI'S ALLEGATIONS**  
16 **THAT UNIFORM RATES ARE ECONOMICALLY**  
17 **INEFFICIENT?**

18 **A.** No. I believe the opposite is true. Although perhaps not always  
19 quantifiable, we believe there will be significant efficiencies achieved  
20 in the customer service, accounting, reporting, rate administration and  
21 other areas. One confirmation of such efficiency is the fact that it  
22 now takes one day for our accounting personnel to download the



1 information for our annual reports to the Commission versus two  
2 weeks of downloading prior to the establishment of uniform rates.  
3 Uniform rates are economically efficient. Mr. William Grantmyre,  
4 President of Heater Utilities, Inc., also confirms that the other  
5 efficiencies I expect to occur have actually occurred for his utility  
6 under uniform rates. To further illustrate the benefits of uniform rates,  
7 I must repeat that uniform rates reflect Southern States' company-wide  
8 cost of service. One element of the many, many elements of our cost  
9 of service is depreciation. On a Company-wide basis, a pool of  
10 depreciation costs is created, in the amount of approximately \$8  
11 million or \$9 million. These funds are available to finance plant  
12 improvements, expansions and replacements statewide on a priority  
13 basis, regardless of the system or specific facility from which the  
14 depreciated costs arose. The use of depreciation funds to internally  
15 finance construction results in a cost savings to customers since  
16 outside sources of capital are minimized. The significance of these  
17 facts is confirmed in situations like those facing our Sugarmill Woods  
18 customers. As both Mr. Pennacchio and I indicated in our direct  
19 testimony, customers who paid high levels of CIAC when they  
20 connected will be the most severely effected, on a percentage basis, in  
21 terms of rate increases when the facilities serving them need to be  
22 rebuilt, improved or expanded. The result of high CIAC

1 contributions from Sugarmill Woods customers is that Southern States  
2 was left with a very small or no recovery of depreciation in rates. As  
3 I just explained, the pool of depreciation costs recovered Company-  
4 wide by Southern States from all of our other customers can be made  
5 available to internally finance investments in facilities serving our  
6 Sugarmill Woods customers thus reducing the costs of such  
7 investments. If these funds were not available, Southern States would  
8 be forced to enter the debt and equity markets to obtain the necessary  
9 funds. Additional financing cost and rate case expense would be  
10 incurred to restore rates designed to recover such cost.

11 A further flaw in Mr. Cicchetti's allegations of economic  
12 inefficiency is apparent from the fact that the uniform rates reduce the  
13 level of intergenerational discrimination between customers. Under  
14 pseudo-stand alone rates, the logical impact of capital investments in  
15 year 1 is higher rates in year 1. Over time, if all other things  
16 remained unchanged, rates could decrease as the associated plant is  
17 depreciated and rate base reduced. Thus, new customers who connect  
18 in year 10 would be paying lower rates than the rates that customers  
19 who existed in years 1 through 9 were paying. Under uniform rates,  
20 the initial capital investment is spread over a significantly larger  
21 customer base so this intergenerational inequity is reduced -- rates are  
22 more stabilized.



1 Q. WHY DON'T THE ANALYSES CONDUCTED BY MR.  
2 HANSEN OR MR. CICCETTI RECOGNIZE THE  
3 EXISTENCE OF THESE BENEFITS?

4 A. The fatal flaw in the analyses of Mr. Hansen and Mr. Cicchetti is that  
5 they both prefer to look only at today and not the long term. Their  
6 refusal to consider the long term impacts of uniform rates is  
7 symptomatic of the desire expressed by Mr. Hansen and other COVA  
8 representatives to be able to reap all of the benefits of being served by  
9 one large utility while attempting at the same time to benefit from the  
10 one factor, CIAC, which would serve to reduce their rates further if  
11 analyzed as if it were the sole determinant of rates. CIAC is not the  
12 sole determinant of rates but is one of a multitude of determinants.  
13 To focus solely on CIAC would be unfair to our remaining 100,000  
14 customers. As Mr. Hansen admits, the entity which owned and  
15 operated the Sugarmill Woods system prior to Southern States was  
16 experiencing financial difficulty. The prior owner not only lacked the  
17 financial resources to refund CIAC to Sugarmill Woods customers but  
18 also lacked the funds to invest in capital improvements in the  
19 Sugarmill Woods system. As the Commission is aware, if a utility is  
20 in financial straits, the cost of obtaining capital increases accordingly  
21 (if such capital can be obtained at all). In contrast to the prior

22 situation, the acquisition of the Sugarmill Woods system by

1 Southern States, the necessary investments were made in the system at  
2 a cost of capital which continues to decrease, as explained by  
3 Southern States' witnesses Vierima and Mr. Jerry W. Ford, Group  
4 Vice President and Manager of SunTrust Public Finance, a division of  
5 Trust Company Bank, Atlanta. In addition to these benefits, Sugarmill  
6 Woods customers benefit in the long and short term from the  
7 economies of scale in purchasing, managerial expertise and many  
8 other benefits associated with being a part of Southern States. Given  
9 these benefits, Southern States believes that Sugarmill Woods  
10 customers already are benefitted by their consolidation with Southern  
11 States' operations and the implementation of uniform rates.

12 **Q. CONSIDERING THE LONG TERM BENEFITS TO**  
13 **SUGARMILL WOODS CUSTOMERS WHICH YOU HAVE**  
14 **DESCRIBED, WHY DO YOU BELIEVE COVA HAS**  
15 **REMAINED STEADFAST IN THEIR OPPOSITION TO**  
16 **UNIFORM RATES?**

17 **A.** When I consider the opposition of our Sugarmill Woods customers to  
18 the Commission's uniform rate decision, I recall Mr. Pennacchio's  
19 direct testimony in this proceeding concerning his experience with  
20 General Motors in a rate proceeding involving Indiana-American  
21 Water Company. Mr. Pennacchio describes how General Motors  
22 opposed a uniform rate proposal in that proceeding because it would



1 not benefit immediately from the implementation of uniform rates.  
2 However, Indiana-American has now filed another rate application  
3 proposing uniform rates, and General Motors is not opposing them.  
4 Why? The uniform rates being requested are now lower than the  
5 "stand alone" rates General Motors would otherwise pay to Indiana-  
6 American. General Motors' actions clearly were guided solely by  
7 what was best for General Motors. The Commission should not limit  
8 its focus to a single system. Hernando County is not effected by the  
9 uniform rate but is a bulk wastewater customer served under a  
10 separate service classification. Citrus County is a customer --  
11 however, the uniform rates are lower than the pseudo-stand alone rates  
12 which Citrus County otherwise would be charged for service. It is not  
13 clear at this time how the taxpayers of Citrus County would react if  
14 they knew that their County was opposing a Commission decision  
15 which has reduced the rate the County, and the County's taxpayers,  
16 have to pay for service from Southern States.

17 We also are perplexed at how Citrus County can oppose  
18 uniform rates when customers of 10 out of 11 of SSU's Citrus County  
19 locations and most of our customers in Citrus County are paying  
20 lower rates with uniform rates than they would be paying with  
21 pseudo-stand alone rates. How can the County favor one of SSU's  
22 Citrus County locations at the expense of customers of ten other

1 Citrus County locations? Also, the County's opposition seems quite  
2 hypocritical since the County itself charges uniform rates to customers  
3 of Citrus County owned systems which are not connected by lines in  
4 the ground.

5 **Q. DO YOU BELIEVE THAT THE RATES FOR SERVICE FOR**  
6 **SUGARMILL WOODS CUSTOMERS WOULD BE LOWER**  
7 **THAN THE UNIFORM RATES IF SUGARMILL WOODS WAS**  
8 **TRULY "STAND ALONE"?**

9 A. No, I do not. First, as indicated by the testimony of Messrs. Vierima  
10 and Ford the cost of capital of a small system serving 1,700 customers  
11 almost surely would be higher than Southern States' cost of capital.  
12 Also, operating costs would be significantly higher because Sugarmill  
13 Woods would not have the economies of scale which are enjoyed as a  
14 result of Southern States' bulk purchases. In addition, the high level  
15 of CIAC on the Sugarmill Woods system would have two detrimental  
16 effects. First, there would be little depreciation costs returned to the  
17 hypothetical stand alone owner to finance replacements,  
18 improvements, etc. Therefore, the owner would have to fund all of  
19 such investments with debt or equity. Second, the owner would have  
20 little incentive to operate the system because there would be minimal  
21 opportunity for profit. Relatively small changes in operating costs  
22 could even place the owner in a loss position. History has shown that



1 owners in this precarious position, and particularly owners which also  
2 are developers, often are inclined to delay making further investments  
3 in systems or make cuts in operation expenses which may not be in  
4 the long term best interest of customers. Therefore, some additional  
5 profit incentive would have to be placed into the rates to ensure  
6 service of the quality currently being rendered by Southern States.  
7 These are only a few of the reasons why I believe the uniform rates  
8 are lower than the rates Sugarmill Woods customers would pay if it  
9 were truly stand alone.

10 In addition to the fact that I believe Sugarmill Woods  
11 customers already are benefitting both from the uniform rates  
12 and the fact that they receive service from Southern States, the  
13 high consumption and high CIAC characteristics of the  
14 Sugarmill Woods system lead to the possibility that "stand  
15 alone" rates would be higher than the rates indicated by  
16 Sugarmill Woods' witnesses due to the potential  
17 implementation by the Commission of inclining block  
18 conservation rates for that system (in addition to the percentage  
19 of O&M rate kicker I referred to previously).

20 Q. HAS SOUTHERN STATES MADE ANY ATTEMPT TO  
21 QUANTIFY THE STAND ALONE RATE FOR THE  
22 SUGARMILL WOODS SYSTEM IF IT WERE NOT PART OF

1                   **SOUTHERN STATES?**

2           A.     We have conducted a comparison of hundreds of utility rates being  
3                   charged by both public and private water and wastewater providers in  
4                   Florida. The uniform rate of \$17.15 for 10,000 gallons of water being  
5                   charged to the 1,700 customers of Sugarmill Woods is nearly \$3 lower  
6                   than the average rate (\$19.99) for the same consumption being  
7                   charged by 22 other utilities in the state serving between 1,001 and  
8                   2,500 customers.

9                   We made a similar comparison of rates for 10,000 gallons of  
10                  water for systems serving between 10,001 and 25,000 customers. This  
11                  would be the customer range into which Southern States' Spring Hill  
12                  system in Hernando County would fall. The uniform rate for our  
13                  Spring Hill customers for 10,000 gallons of water (\$17.15) is more  
14                  than \$5 cheaper than the average rate charged by 43 other public and  
15                  private providers for the same consumption (\$22.16). We believe  
16                  these facts indicate that it is as likely as not that our Sugarmill Woods  
17                  and Spring Hill customers would be paying higher rates if they were  
18                  truly stand alone.

19                 We also believe that these facts demonstrate that uniform rates  
20                 for Southern States are no different than uniform rates for any county  
                  or municipality. Uniform rates offer Southern States' customers the  
                  benefits of economies of scale and access to lower cost



1 capital markets, as those being obtained by customers served by  
2 counties and municipalities. As indicated in Southern States pre-fil  
3 direct testimony, the difference in cost of service between our syste  
4 located statewide probably is no greater than differences between n  
5 interconnected systems within the boundaries of a city or county--  
6 which boundaries are political only.

7 Q. DO YOU AGREE WITH THE REPRESENTATION OF  
8 COVA'S WITNESS HANSEN AS TO THE NUMBER OF  
9 CUSTOMERS BENEFICIALLY IMPACTED BY  
10 UNIFORM RATES?

11 A. No. As I previously indicated, all customers benefit  
12 immediately from uniform rates. Also, Mr. Hansen segregates  
13 water customers from wastewater customers to give the  
14 appearance that high percentages of both types of customers are  
15 paying high utility bills as a result of the Commission's  
16 decision. This is not practical. The vast majority of Southern  
17 States wastewater customers also are water customers.  
18 Customers receiving both water and wastewater service will be  
19 concerned with their total water and wastewater bill, not the  
20 charges for water or wastewater individually. As noted in the  
21 Commission's final order in Docket No. 920199-WS, the  
22 Commission compared the "stand alone" rates calculated on a

1 system by system basis to the final uniform statewide rates.

2 The Commission found at page 95 of the Final Order that:

3 In comparing the uniform statewide rates to the  
4 stand-alone rates, we found that for locations  
5 with both water and wastewater systems, at  
6 consumption levels of 6,000 gallons per month,  
7 approximately thirty locations (60 systems)  
8 would have paid uniform higher water and  
9 wastewater rates than the uniform rates; of those,  
10 approximately fourteen locations would have  
11 been paying \$40 to \$130 more than the uniform  
12 rates. Only seven locations would have had  
13 lower rates (sic) combined water and wastewater  
14 rates on a stand alone basis; of those, the  
15 difference between stand alone and uniform rates  
16 ranged from approximately \$19 to \$2.

17 In terms of customers, 52,402 customers have a lower  
18 combined water and wastewater bill as opposed to 50,682  
19 customers who have a higher combined bill.

20 **Q. DO YOU HAVE ANY COMMENTS CONCERNING**  
21 **HERNANDO COUNTY'S OPPOSITION TO THE UNIFORM**  
22 **RATE STRUCTURE THROUGH ITS SPONSORSHIP OF MR.**



1           **CICCHETTI?**

2           A.     I only wish to note that Hernando County is in the water and  
3                 wastewater business also and that Hernando County, like Citrus  
4                 County (Mr. Cicchetti's other sponsor), charges its customers uniform  
5                 rates despite the fact that it operates "systems" which are not  
6                 physically interconnected by lines in the ground. I also note that  
7                 Hernando County has expressed its desire to acquire our Spring Hill  
8                 system on several occasions in the past and such desire may be  
9                 contributing to their vocal opposition rather than the reasonableness or  
10                legality of the uniform rate concept.

11          **Q.     DO YOU HAVE ANY COMMENTS CONCERNING MR.**  
12                **CICCHETTI'S RELIANCE ON A COMMISSION ORDER**  
13                **REGARDING THE ACQUISITION OF SEBRING UTILITIES**  
14                **COMMISSION BY FLORIDA POWER CORPORATION TO**  
15                **SUPPORT HIS ARGUMENTS IN THIS PROCEEDING?**

16          A.     Yes. First, I note that the Commission order cited by Mr. Cicchetti  
17                 concludes as follows:

18                     ...unique problems require unique solutions, and  
19                     under this particular set of extraordinary  
20                     circumstances, we believe our decision is in the  
21                     best interest of all concerned. To those who  
22                     would view our decision here as precedent, we

1           uncategorically state that this decision has no  
2           precedential value. It is limited to the unique set  
3           of facts in this case. It does not signal a change  
4           in our regulatory policies in any way.

5           One of the policies which the Commission indicated it had not  
6           changed in the Sebring proceeding (and which the commission wished  
7           to reaffirm to the public) was the Commission's general rule that it  
8           would not permit utilities to identify a pool of debt costs and apply  
9           those costs to a particular set of customers. It is this general rule  
10          which benefits Sugarmill Woods customers significantly as a result of  
11          being part of one consolidated utility. COVA witness Hansen admits  
12          that the prior owner of Sugarmill Woods was in poor financial  
13          condition prior to the purchase by Southern States. It is generally  
14          understood that the poorer the financial condition of an entity in need  
15          of a debt or equity infusion, the higher the cost of debt or equity  
16          which will be made available, if any, to the entity. The record in

17          Docket No. 920199-WS contains a significant amount of testimony  
18          confirming that Southern States was able to minimize the cost of debt  
19          and equity, in a consolidated capital structure, as a result of credit  
20          support from Southern States' parent, Minnesota Power & Light  
21          Company -- a diversified electric utility whose financial condition was  
22          far from the condition of Sugarmill Wood's prior owner. Also, as Mr.



1 Vierima and Mr. Ford will testify in this proceeding, the existence of  
2 Southern States as a large, geographically diversified water and  
3 wastewater utility with a consolidated capital structure has enabled  
4 Southern States to minimize its cost of debt through a consolidated  
5 \$45 bond financing in addition to low cost Industrial Development  
6 Revenue Bonds. Despite the fact that these IDRBS were issued under  
7 the auspices of Lee and Collier Counties to finance construction on  
8 Southern States' Lehigh and Marco Island facilities, our entire  
9 customer base, including Sugarmill Woods customers, benefit from the  
10 reduction in Southern States' cost of debt.

11 The Sebring order also did not involve a CIAC issue --  
12 the almost singular focus of COVA's opposition to the  
13 Commission's uniform rate decision. I also note that in the  
14 Sebring order, the Commission found that the general body of  
15 Florida Power Corporation's ratepayers should share in Florida  
16 Power Corporation's recovery of its investment in the Sebring  
17 facilities. I believe that this finding is consistent with the  
18 Commission's treatment of Southern States' rate base for the  
19 127 systems included in Docket No. 920199-WS as one rate  
20 base to be recovered from all of our affected customers.

21 Q. DO YOU HAVE ANY COMMENTS CONCERNING THE  
22 IMPORTANCE WHICH SEVERAL OF THE INTERVENERS'

1           WITNESSES ALLEGE IS PLACED ON CIAC LEVELS WHEN  
2           PEOPLE ARE DECIDING WHETHER TO PURCHASE A  
3           HOUSE?

4           A.    Yes. First, I note Mr. Grantmyre's testimony that in his experience  
5           few customers understand the principles of utility ratemaking, and  
6           particularly the CIAC concept. I must say that Mr. Grantmyre's  
7           experience is the same as my own. I believe the witnesses for  
8           interveners are exaggerating the import of CIAC levels to a buyer's  
9           purchasing decision. Without referring to any text on the subject, of  
10          which I know there are many, I can think of perhaps twenty other  
11          factors considered when buying a home which bear equal weight to  
12          CIAC in the final determination to purchase a particular home. These  
13          include: proximity to family, proximity to friends, proximity to  
14          shopping, proximity to medical aid, proximity to golf courses and  
15          other entertainment media, proximity to a library, proximity to a fire  
16          department or fire hydrants, proximity to schools, quality of schools,  
17          appearance of exterior of home, appearance of interior of home,  
18          appearance of neighborhood, assessment of prospective neighbors,  
19          homeowner's association rules and regulations, applicable  
20          town/city/county ordinances (including zoning), property taxes and  
21          electric rates.

22                I also am aware that both the courts and the Commission



1 repeatedly have found that customers do not obtain ownership of  
2 utility facilities by paying CIAC. Therefore, counsel informs me that  
3 there appears to be little merit to claims of taking of property in  
4 violation of the Constitution.

5 Q. MR. HANSEN DISCUSSES THE RATIO OF CIAC TO PLANT  
6 AS THOUGH IT IS THE PRIMARY DETERMINANT OF THE  
7 LEVEL OF RATES FOR EACH SYSTEM. DO YOU AGREE?

8 A. No. I have attached Exhibit No. \_\_\_\_ (FLL-1) which is a graph  
9 showing the ratio of monthly net CIAC to net plant -- compared to the  
10 monthly CIAC revenue requirements per ERC. Each point on the  
11 lines represents a system with an ID number listed on pages 3 and 4.  
12 The top line represents the percent of net CIAC plant to net plant and  
13 the bottom line represents the monthly CIAC revenue requirement  
14 offset per ERC. ERCs have been used for the CIAC revenue  
15 requirement (bottom line) to establish an equivalent denominator  
16 consistent with that used to develop rates. As shown, the top line is  
17 rising, which means the percentage of CIAC is increasing for those  
18 systems. The bottom line shows, however, that the related CIAC  
19 revenue requirement impact is relatively flat even with the rise in the  
20 percent of contributions. This means that you cannot look at the  
21 CIAC percent as being the driving force behind the level of rates for  
22 systems in general. Other factors must be considered.

1 Q. WHAT DO YOU BELIEVE IS THE PRIMARY DETERMINANT  
2 OF RATES, OVERALL, WHICH DETERMINES THE LEVEL  
3 OF RATES FOR A PARTICULAR SYSTEM?

4 A. I do not believe you can say there is one principal determinant of rates  
5 which will hold true for all systems, but when you compare the  
6 systems that pay a "subsidy" against those that receive a "subsidy,"  
7 there are two key factors which differ between the groups -- customer  
8 density and consumption levels. Exhibit No. \_\_\_\_ (FLL-2) compares  
9 data from the two groups as follows:

	<u>Uniform Systems/Water</u>	
	Paying	Receiving
	<u>Subsidy</u>	<u>Subsidy</u>
13 Avg. Number of Customers per System	5,650	233
14 Average Consumption/mo(gw)	10,943	6,257

15 Those systems paying a subsidy on average have almost twice the  
16 number of customers as those systems receiving a subsidy. The  
17 economies of scale impact of high density is shown in the lower base  
18 charge of \$3.48 for water systems paying a subsidy compared to \$7.94  
19 for water systems receiving a subsidy. Likewise, the consumption for  
20 those systems paying a subsidy is almost double the consumption of  
21 those systems receiving a subsidy. This results in a low gallonage

22 of \$6.44 for subsidizing systems versus \$2.50 for the subsidized



1 systems. Clearly, the low gallonage charge is related to high  
2 consumption and does not send a good conservation signal to  
3 customers using large amounts of water. The current uniform water  
4 rate of \$5.05 base and \$1.21 gallonage (with recent indexing) is  
5 certainly reasonable and sends a more appropriate conservation signal.  
6 In any event, there certainly is a clear indication from this data that,  
7 overall, the primary determinants of the level of rates are the customer  
8 density of the system and the level of consumption by customers, not  
9 CIAC.

10 **Q. MR. HANSEN CLAIMS THAT CIAC IS THE PRIMARY**  
11 **FACTOR IN DETERMINING WHETHER A CUSTOMER**  
12 **PAYS OR RECEIVES A SUBSIDY UNDER UNIFORM**  
13 **RATES. DO YOU AGREE?**

14 **A.** No. I have attached Exhibit \_\_\_\_ (FLL-3) which contains  
15 graphs for water and wastewater showing the monthly revenue  
16 subsidy per ERC by system compared to the monthly CIAC  
17 revenue offset per ERC. The top line shows the monthly  
18 revenue subsidy between stand-alone and uniform rates per  
19 ERC for each system. The systems paying a subsidy appear on  
20 the point below "\$0" and those systems receiving a subsidy  
21 appear above the "\$0" point. As shown, the top line trends  
22 and rises sharply towards the

1 end, indicating higher subsidies. The bottom line represents  
2 the monthly CIAC revenue requirement per ERC and shows a  
3 fairly flat pattern across the graph with spikes for a few  
4 systems. Clearly, the overall view of the graph shows that  
5 CIAC revenue requirements do not track revenue subsidy as  
6 Mr. Hansen indicates. In fact, some of the highest contributors  
7 of CIAC on a revenue requirement per ERC basis are the most  
8 subsidized, such as Fountains, Gospel Island, and Silver Lake  
9 Oaks.

10 Q. DOES A SIMILAR PATTERN FOR CIAC EXIST WHEN  
11 YOU COMPARE TOTAL SYSTEM REVENUE  
12 REQUIREMENTS TO CIAC REVENUE  
13 REQUIREMENTS?

14 A. Yes. Attached as Exhibit \_\_\_\_ (FLL-4) is a graph similar to  
15 Exhibit \_\_\_\_ (FLL-3) except comparing the monthly revenue  
16 requirements per ERC for each system against monthly CIAC  
17 revenue requirements per ERC. The top line shows total  
18 system revenue requirements and the bottom line shows CIAC  
19 revenue requirements. Again, as total revenue requirements for  
20 each system rises, the CIAC revenue requirements stay  
21 relatively flat which indicates that the amount of CIAC does  
not change proportionately for each system. In



1 fact, several systems with the highest stand-alone rates and  
2 revenue requirements also have the highest CIAC revenue  
3 requirement offset. This again supports the argument that  
4 CIAC does not drive rates but that density and consumption are  
5 your primary determinants of rate levels.

6 **Q. ARE THERE OTHER FACTORS WHICH YOU CAN**  
7 **IDENTIFY AS A COMMON THREAD BETWEEN ALL**  
8 **SYSTEMS WHICH IMPACTS THE LEVEL OF RATES?**

9 A. I have not been able to identify any one factor or combination of  
10 factors which definitely will result in higher or lower rates. There are  
11 many combinations of factors in addition to density and consumption  
12 which can affect the rates for an individual system such as CIAC,  
13 O&M expenses, investment cost and the age of the plant. These costs,  
14 however, can occur in different combinations for each system and do  
15 not each individually dictate the level of rates for a system or all  
16 systems. An example is Gospel Island water with a ratio of net CIAC  
17 to net plant of 95.69%, or 22.33% of total revenue requirements.

18 Gospel Island is, however, the second highest revenue beneficiary  
19 from uniform rates at \$94.03 per ERC. This is a density and  
20 consumption situation which in most cases overrides other rate  
21 determinants. Gospel Island has 8 customers and average

22 consumption of 6,000 gallons per month. There obviously are no

1 economies of scale benefits in this system on a "stand alone" basis.

2 Q. DO YOU HAVE ANY COMMENTS CONCERNING MR.  
3 HANSEN'S REPEATED REFERENCES TO "UNIQUE" OR  
4 "SPECIAL" CIRCUMSTANCES WHENEVER HIS ATTEMPT  
5 TO DRAW A DIRECT RELATIONSHIP BETWEEN CIAC AND  
6 RATE LEVELS DOES NOT HOLD TRUE?

7 A. Yes. Mr. Hansen attempts to blame the many instances where his  
8 CIAC analysis does not hold true on "unique" or "special"  
9 circumstances. Mr. Hansen refuses to recognize that no analysis can  
10 be done of solely one element of the hundreds of elements which are  
11 considered when determining revenue requirements which will explain  
12 conclusively why rates are high, moderate or low. As I have  
13 demonstrated, the frequency of alleged unique or special circumstances  
14 skewing the results of Mr. Hansen's analysis is due to the fact that  
15 there are many factors which effect rates and any one of those factors  
16 may be the primary determinant of the level of rates. For Sugarmill  
17 Woods, the primary determinant of rates may be CIAC. For another  
18 "system", the primary determinant may be customer base or customer  
19 density, for another, it may be age of the facilities -- these are not  
20 unique circumstances, these are typical.

21 Q. DO YOU HAVE ANY OTHER CONCERNS IF THE  
COMMISSION WERE TO FOCUS UNDUE ATTENTION ON



1           **CIAC?**

2           A.    Yes. At pages 7 and 8 of his pre-filed direct testimony Staff witness  
3               Williams identifies a primary flaw in a ratesetting approach which  
4               places undue emphasis on CIAC levels. As Mr. Williams indicates,  
5               the ratio of CIAC to plant investment can swing dramatically from  
6               one year to the next as investments are made in utility plant. If the  
7               next Citrus County sinkhole was to develop at Sugarmill Woods'  
8               water treatment plant site, the CIAC contribution level could decrease  
9               dramatically. Similarly, if a particular "system" is built out, additional  
10              investments in facilities serving the system would directly decrease the  
11              CIAC ratio to plant. These situations further confirm the impropriety  
12              of placing undue emphasis on CIAC for ratesetting purposes as well  
13              as the necessity to view ratesetting from a long term perspective.

14          **Q.    DO YOU BELIEVE THAT WATER AND WASTEWATER**  
15          **UTILITIES SHOULD BE TREATED DIFFERENTLY THAN**  
16          **ELECTRIC OR GAS UTILITIES REGARDING RATE**  
17          **STRUCTURE?**

18          A.    No, not if the water and wastewater utility provides service to multiple  
19               areas of the state and has consolidated management and operations to  
20               the extent that Southern States has consolidated them. Although  
21               opponents to uniform rates continue to claim that uniform rates are not  
22               appropriate for Southern States because many of our "systems" are not

1 interconnected by lines in the ground, this argument has little  
2 significance for rate-setting purposes. A cost of electric service study  
3 can be performed for any selected county, subdivision or home in the  
4 same way that such studies can be performed for a water utility. If  
5 performed, the electric cost of service study will indicate wide-ranging  
6 costs of providing service to different counties, subdivisions or  
7 individual homes. The point is that common sense dictates against  
8 establishing rates in such fashion. Uniform rates are established for  
9 residential customers of individual electric utilities primarily because  
10 there is one provider and the service provided, electricity, is  
11 essentially the same. These facts hold true for Southern States.  
12 Despite Mr. Cicchetti's assertions to the contrary, Southern States is  
13 one utility -- not a conglomeration of low cost and high cost  
14 providers. At this point in time, our management and operations are  
15 consolidated to the maximum extent possible and, I believe, as much  
16 as any utility's management and operations can be consolidated.  
17 Uniform rates make sense now for Southern States and our customers.

18 **Q. DO YOU HAVE ANY COMMENTS REGARDING THE**  
19 **CONCERNS RAISED ABOUT COMMISSION ENFORCEMENT**  
20 **OF SOUTHERN STATES' COMPLIANCE WITH CIAC**  
21 **GUIDELINES?**

22 A. Satisfaction of the CIAC guidelines is monitored by the Commission



1 and its staff in every rate case in which I have been involved. The  
2 Commission's final order in Docket No. 920199-WS requires Southern  
3 States to initiate a service availability charge proceeding within two  
4 years which would apply to all of the 127 systems included in that  
5 docket. Also, it should be noted that the rule simply sets forth  
6 guidelines. Southern States does not believe that the Commission,  
7 Commission Staff, Southern States or any other entity has been  
8 derelict in complying with or monitoring compliance with the rule's  
9 guidelines.

10 **Q. COULD YOU SUMMARIZE THE BENEFITS SOUTHERN**  
11 **STATES BELIEVES ARE DERIVED FROM UNIFORM**  
12 **RATES?**

13 **A.** Yes. However, before doing so, I must emphasize that rather than  
14 focus on the immediate, and we believe short term, attributes of the  
15 Commission's uniform rate decision, Southern States has attempted to  
16 provide the Commission with evidence of both the long and short  
17 term, universal benefits of uniform rates for Southern States'  
18 customers. As Messrs. Stewart and Waller have indicated, the  
19 potential for adverse geographical and environmental hazards to our  
20 customers, particularly those in Citrus County, is real. Such adverse  
21 events could result in the doubling or tripling of an individual  
22 system's rates, on a pseudo stand alone basis. Uniform rates would

1 make it highly unlikely that such rate shock would ever occur. I agree  
2 with the analogy made by both Messrs. Gutzke and Grantmyre of  
3 uniform rates as an effective insurance policy against rate shock. I  
4 also believe that the Commission Staff's analysis of the perceived  
5 advantages and disadvantages of uniform rates (as communicated to  
6 the Commission in relation to an attempt by two legislators to  
7 eliminate legislatively the Commission's discretion to establish  
8 uniform rates) conflicts with Mr. Cicchetti's claim that there are no  
9 long term benefits from uniform rates. Therefore, I believe it is  
10 important to identify and discuss Commission Staff's findings here.

11 The short and long term advantages identified by Commission  
12 Staff were as follows:

13 Short Run

14 1. Lower rates for utility's customers.

15 The average costs of operations and major plant capital  
16 expenditures are spread over the entire body of utility  
17 customers rather than over the customer base of one particular  
18 system.

19 2. Insulation of Customers from rate shock.

20 Major capital investments to meet increased environmental  
21 standards or to replace obsolete existing plant may result in  
22 dramatic increases in revenue requirements. A system's



1 customers could experience an immediate doubling, tripling  
2 or even higher increase of rates. Averaging rates of multiple  
3 systems allows a given increase to be smaller on a per  
4 customer basis. Individual systems make such investments at  
5 varying times, therefore averaging of rates benefits all  
6 customers over time as different systems require major capital  
7 investments.

8 3. Lower rate case expense.

9 Allowing the systems to be combined for ratemaking purposes  
10 results in lower total rate case expense. These avoided  
11 expenses benefit all systems.

12 4. Ease of understanding by customers.

13 Customers question why systems located near each other, or  
14 within the same county, have different rates. A uniform  
15 structure eliminates this confusion.

16 Long Run

17 5. Industry restructure.

18 There is a national trend to reorganize and consolidate the  
19 water industry due to the cost pressures of implementing the  
20 Safe Drinking Water Act and the Clean Air Act. Uniform rates  
21 encourage this restructure by providing an incentive to larger  
systems to acquire small systems with the possibility of

1 implementing uniform rates after a take-over.

2 6. Administrative efficiencies and economies of scale in  
3 accounting, and operations and maintenance.

4 All administrative functions of the individual utilities can be  
5 consolidated in one location, with one set of records (billing,  
6 maintenance, etc.) rather than separate books and records  
7 maintained at each individual system location with separate  
8 billing. These efficiencies translate into cost savings for the  
9 utility and ultimately its customers.

10 7. Reduce frequency of rate case filings.

11 Averaging rates over the entire rate base and customer base of  
12 the utility allow the utility to offset individual system revenue  
13 deficiencies with other individual system revenues, thus  
14 minimizing or eliminating the need for filing rate cases on a  
15 frequent basis. Customers benefit by maintaining their existing  
16 rate level for a longer period of time.

17 8. Access to capital.

18 Uniform rates in multi-systems utilities allow the utility to  
19 minimize the operating risk across all systems. Reduced risk  
20 and stabilized revenue flows make the utility a viable candidate  
21 for participating in higher end capital markets.

22 Northern States agrees that each of the advantages identified by Staff



1 exists. We believe that the existence of these advantages provide  
2 overwhelming evidence in support of the Commission's uniform rate  
3 decision.

4 The disadvantages identified by Commission Staff, and  
5 Southern States' comments concerning them, are as follows:

- 6 1. Customers who paid significant CIAC charges to connect to a  
7 utility system may lose the benefit of lower monthly rates when  
8 grouped for ratemaking with systems which have lower CIAC  
9 contributions.

#### 10 Southern State's Comments

11 The alleged direct relationship between CIAC levels and rate levels  
12 does not exist -- in short, the payment of higher amounts of CIAC by  
13 customers does not in and of itself translate into lower rates.

14 Moreover, as I indicated previously in this testimony, it would be  
15 unfair to consider CIAC payments by Sugarmill Woods customers in a  
16 vacuum. By the admission of one of the witnesses for Sugarmill  
17 Woods, the prior owner of that system was in poor financial condition,  
18 and Southern States is aware that the prior owner was unable to make  
19 necessary investments in that system to maintain compliance with  
20 applicable laws and standards. Southern States then bought the system  
21 and invested the funds necessary to maintain compliance and provide  
22 satisfactory service to our customers. Also, as I previously indicated,

1 the uniform rates are approximately \$3 lower for 10,000 gallons of  
2 water than the average rate for systems of similar size to Sugarmill  
3 Woods which are owned and operated by other utility providers. It  
4 appears from these facts that Sugarmill Woods customers already have  
5 benefited and are benefitting from Southern States' ownership.

6 2. Average rates may not reflect the cost of service for any  
7 particular system in isolation.

8 Because the rate is average, some customers pay less than the  
9 cost of service and some customers pay more.

10 Southern States' Comments

11 Southern States does not recognize this fact as a problem. The  
12 "averaging" of rates across the state is the key ingredient to revenue  
13 stability and rate stability which is a primary goal of utility  
14 ratemaking. Rate "averaging" (uniform rates) minimizes rate shock,  
15 reduces Southern State's capital costs, administrative costs and  
16 customer service costs, reduces customer confusion and provides  
17 financial and managerial flexibility not otherwise available to Southern  
18 States.

19 3. Loss of flexibility to design rates to deal with specific  
20 geographic problems.

21 Rates that have a unique structure such as inverted block for  
22 the city of Miami could not be implemented for systems with



1 high per-capita consumption in water supply caution areas.

2 Southern States' Comments

3 Southern States does not agree. Conservation rates could be  
4 implemented in either of two ways which we believe would be as  
5 effective as stand alone inverted rates. Uniform inverted rates could  
6 be implemented which would apply statewide. The systems with  
7 lower consumption levels would be factored into the equation to  
8 determine the rate blocks which we believe will reduce the level of  
9 consumption at which the initial block will be set. Thus, the  
10 "conservation" effect would kick in at a lower level of consumption.  
11 In the alternative, if system specific conservation rates were desired, a  
12 conservation add-on could be determined for the desired systems.

13 4. Cross-subsidy between systems based on treatment type.

14 Customers in systems with low cost, traditional treatment  
15 processes may subsidize customers in systems with advanced  
16 types of treatment technologies in the short run.

17 Southern States' Comments

18 Southern States agrees with Mr. Gartzke that this problem is a public  
19 policy consideration. The fact remains that many of Southern States'  
20 systems, if considered on a theoretical or pseudo "stand alone" basis,  
21 would have costs of service equal to or in excess of the cost of service

of many other systems. Systems using "traditional treatment

1 processes," such as our Point O'Woods system discussed by Mr.  
2 Gartzke, can and do "go dry" or experience sinkholes, water  
3 degradation, or any number of other circumstances which can cause  
4 the cost of service to rise to a level similar to that of an advanced  
5 treatment system. Whether these possibilities justify the combination  
6 of all systems, standard and advanced, into one consolidated rate may  
7 turn upon whether the resulting rate would be fair, just and reasonable  
8 to all customers.

9 5. Cross-subsidy based on the phase of development in the service  
10 area.

11 Customers in larger, more mature communities (with larger  
12 customer bases) are forced to subsidize customers in tiny  
13 communities that are in the initial phases of development (with  
14 small customer bases) in the short run.

15 Southern States' Comments

16 Southern States agrees that the problem identified is a short term  
17 problem, particularly if rates to be charged to customers in developing  
18 areas are reasonable. It is the future growth in the customer base from  
19 developing areas that will benefit the more mature, built out systems  
20 which, by definition, have much less growth potential in the future.

21 The Commission should not lose sight of the fact that monthly rates of

22 \$1.00 for 10,000 gallons of water would not be conducive



1 to growth. In this regard, I also would like to note that Southern  
2 States is puzzled by Mr. Cicchetti's insinuations that the social welfare  
3 of our customers would be benefitted from "stand alone" rates at such  
4 levels.

5 **Q. DO YOU HAVE ANY CONCLUDING REMARKS IN**  
6 **REBUTTAL TO THE INTERVENORS' WITNESSES?**

7 A. Yes, I disagree with Mr. Cicchetti and other witnesses who suggest  
8 that uniform rates offer no long term benefits to Southern States and  
9 our customers. The uniform rates represent the culmination of a  
10 succession of steps toward the consolidation of Southern States into  
11 one utility. Uniform rates are a common sense reaction to the  
12 alternative -- \$50, \$80 and even \$100 monthly charges for water --  
13 which have resulted primarily due to new, more stringent and more  
14 strictly enforced laws and standards designed to protect the  
15 environment and the public health and safety. At this time, we believe  
16 the only truly "stand alone" element of Southern States' revenue  
17 requirement for any individual system is the electricity necessary to  
18 power the pumps and light the lights. In contrast, as a large,  
19 consolidated, professionally managed and operated utility, Southern  
20 States has been able to keep the cost of serving our customers as low  
21 as possible -- by capitalizing on economies of scale, by participating  
22 in rulemaking proceedings of environmental regulators to prevent the

1 passage of rules which would dramatically increase the cost of public  
2 water supplies, by accessing capital markets heretofore inaccessible,  
3 and any number of other methods available to Southern States as a  
4 result of our size and staffing with utility professionals. CIAC  
5 contributions are only one of the hundreds of elements which  
6 comprise Southern States' revenue requirement. CIAC should not be  
7 viewed in a vacuum. Rather, the many long and short term benefits I  
8 and other witnesses for Southern States have described must be  
9 considered in determining fair and reasonable rates for all of our  
10 customers. After due consideration of the whole picture, we believe  
11 uniform rates are fair and reasonable to our customers.

12 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

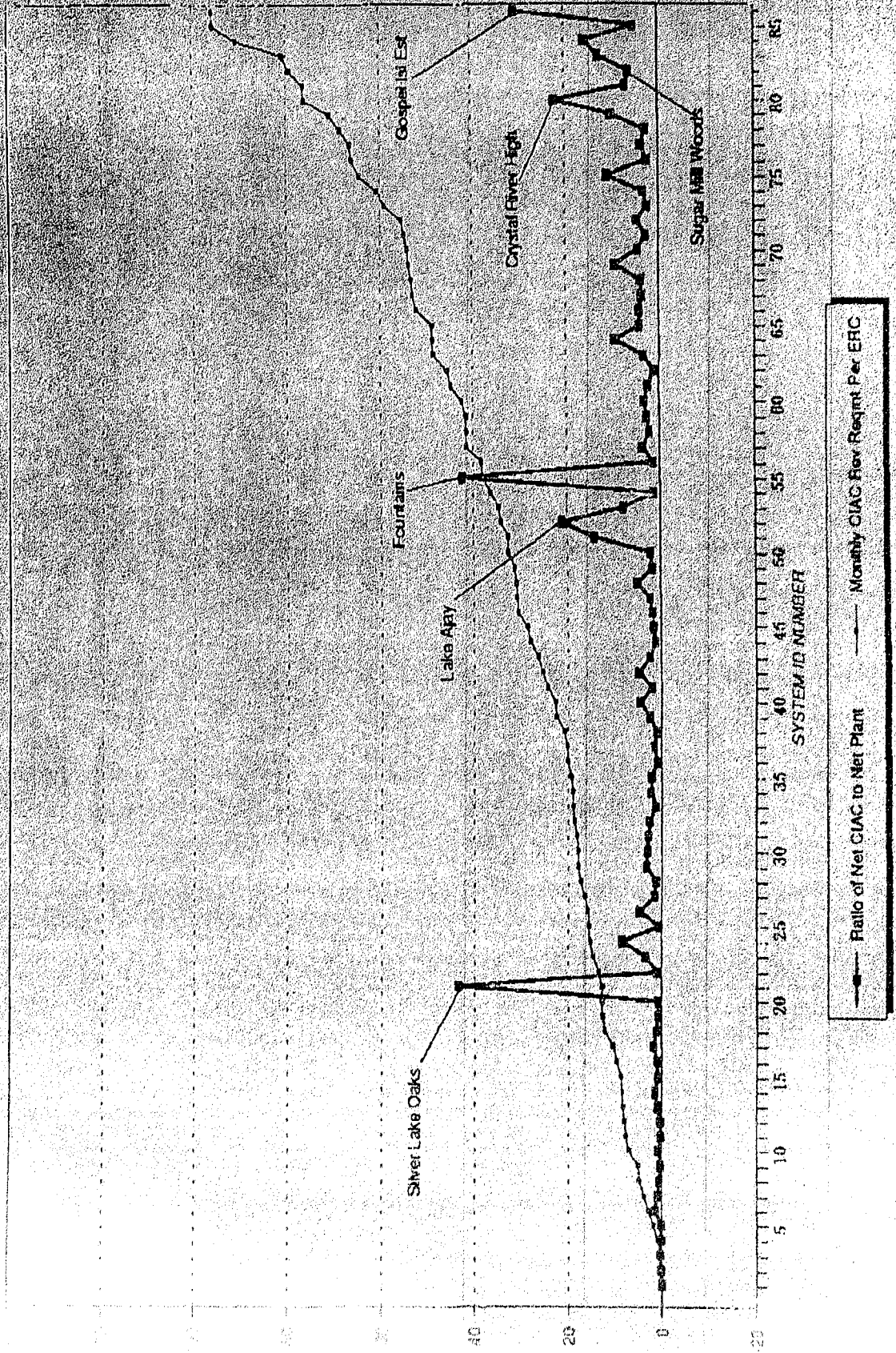
13 **A.** Yes, it does.  
14



# SOUTHERN STATES UTILITIES

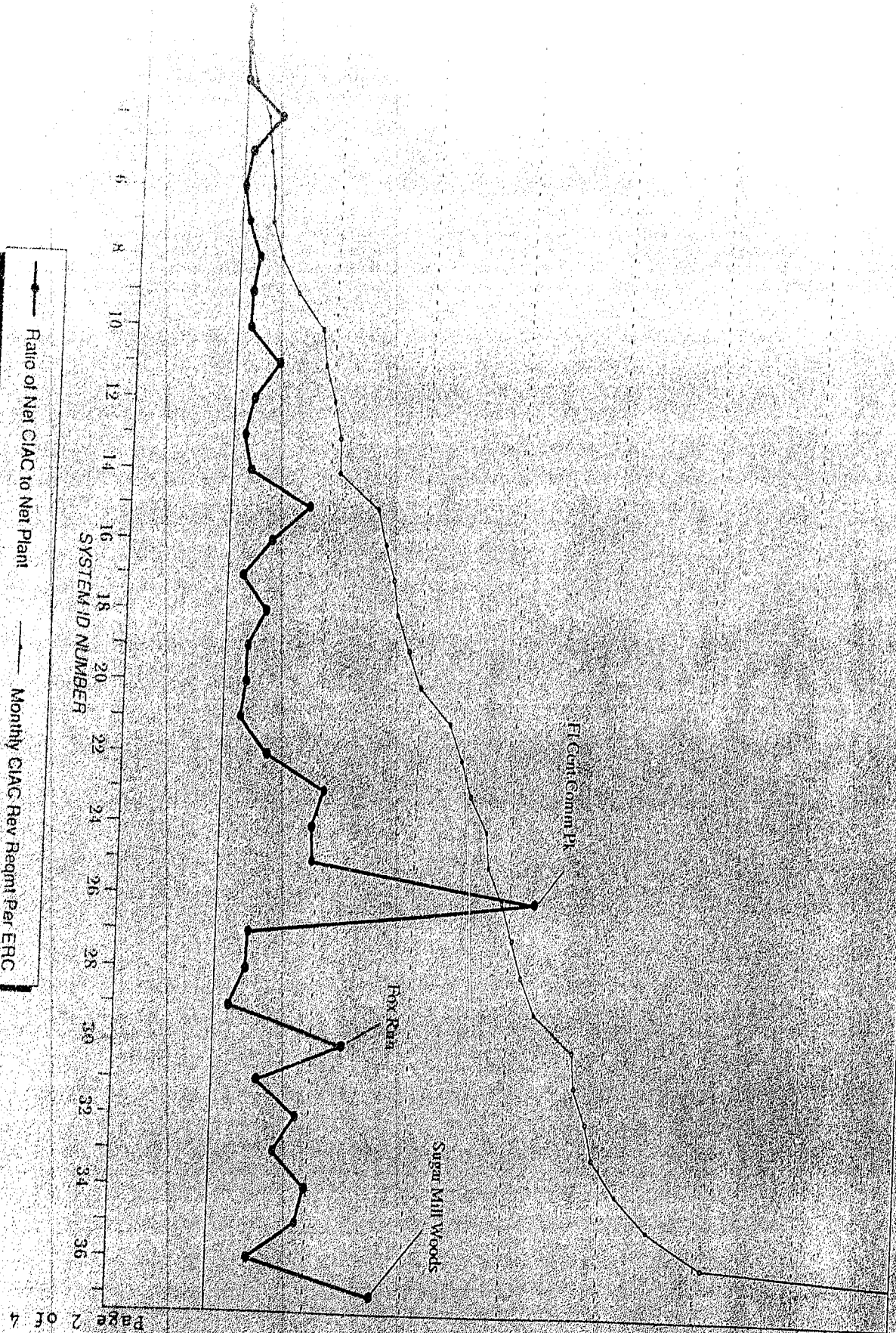
## WATER COMPARISON

Ratio of Net CIAC to Net Plant -- to -- Monthly CIAC Revenue Reqmts per ERC



# **SOUTHERN STATES UTILITIES WASTEWATER COMPARISON**

Ratio of Net CIAC to Net Plant -- to -- Monthly CIAC Revenue Reqmts per ERC





SOUTHERN STATES UTILITIES  
WATER COMPARISON  
RATIO OF NET CIAC TO NET PLANT - TO - MONTHLY CIAC REVENUE REQUIREMENTS PER CIAC

Line No. System Name County CIAC Pay Ratio Net Plant Ratio

1	Lakeview Villas	Clay	\$0.00	0.00%
2	Quail Ridge	Lake	\$0.06	0.20%
3	Palmdale County CB	Lake	\$0.22	0.42%
4	Harmony Homes	Seminole	\$0.11	0.63%
5	Kingwood	Brevard	\$0.04	1.23%
6	Salt Springs	Maitland	\$1.44	2.85%
7	Salt Springs Harbor	Palm Bay	\$0.80	3.67%
8	Hermite Cove	Palm Bay	\$0.26	4.77%
9	Hobby Hills	Lake	\$0.66	5.08%
10	Intercession City	Osceola	\$0.14	8.94%
11	Oakwood	Brevard	\$1.03	7.80%
12	East Lake Harbor	Lake	\$1.33	8.21%
13	Old Hills	Seminole	\$0.81	8.06%
14	De Ray Manor	Seminole	\$0.65	9.68%
15	Morningview	Lake	\$0.93	9.87%
16	Keystone Heights	Clay	\$1.75	10.30%
17	Bay Lake Estates	Osceola	\$1.06	12.07%
18	Pinet Woods	Lake	\$0.87	12.42%
19	Topical Park	Osceola	\$0.62	12.55%
20	River Park	Palm Bay	\$0.81	12.57%
21	Silver Lake Oaks	Palm Bay	\$3.48	13.33%
22	Fern Park	Seminole	\$8.23	14.61%
23	Burnt Store	Charl. Lake	\$0.51	15.32%
24	Sunshine Parkway	Lake	\$4.61	15.48%
25	Balms Mobile Home Pk	Lake	\$1.45	15.77%
26	Grand Terrace	Lake	\$1.25	16.51%
27	Lake Conway Park	Orange	\$3.57	17.32%
28	Meadell Manor	Seminole	\$2.87	17.80%
29	Stone Mountain	Lake	\$2.62	17.93%
30	Chuluota	Seminole	\$2.33	18.06%
31	Postmaster Village	Clay	\$1.17	18.60%
32	Holiday Heights	Orange	\$1.17	18.91%
33	St. Johns Highlands	Palm Bay	\$2.14	19.05%
34	River Grove	Palm Bay	\$0.78	19.20%
35	Clarus Springs Hill	Clarus	\$0.78	20.11%
36	Golden Terrace	Clarus	\$5.00	20.20%
37	Friendly Center	Lake	\$0.86	20.84%
38	Fern Terrace	Lake	\$2.37	22.48%
39	Lake Branley	Seminole	\$4.05	22.60%
40	Beachfront Point	Palm Bay	\$2.01	24.36%
41	Palm Port	Maitland	\$4.53	25.48%
42	Maitland Oaks Hill	Washington	\$2.37	26.38%
43	Sunny Hills Hill	Palm Bay	\$1.50	26.50%
44	Romona Park	Palm Bay	\$1.75	30.40%
45	Interlachen Lk Est	Lake	\$2.35	30.50%
46	Skycrest	Lake	\$1.91	30.75%
47	Piccola Island	Clarus	\$4.71	31.20%
48	Imperial Mobile Home	Lake	\$3.13	32.49%
50	Lake Harriet Estates	Seminole	\$14.04	33.07%
51	Fox Run	Maitland	\$21.02	33.33%
52	Lake Alay Estates	Osceola	\$7.73	34.08%
53	Maitland Shores Hill	Clarus	\$1.42	37.87%
54	Zephyr Shores	Pasco	\$42.11	38.33%
55	Fountains	Pasco	\$3.85	41.38%
56	Palm Terrace	Palm Bay	\$2.17	41.42%
57	Apple Valley	Palm Bay	\$2.71	41.44%
59	Danwyler Shores	Orange	\$3.17	42.52%
60	Lillian Heights	Maitland	\$2.42	44.83%
61	Apache Shores	Clarus	\$1.25	45.63%
62	Jungle Den	Volusia	\$2.72	48.58%
63	Oak Forest	Clarus	\$3.34	48.71%
64	Waresong	Osceola	\$0.93	48.84%
65	Lakeside Lakes	Higginbotham	\$4.09	52.19%
66	Pointe Du Marais	Clarus	\$4.13	52.90%
67	Lakewood Village	Lake	\$3.70	53.28%
68	Spur - Lakewood	Higginbotham	\$3.75	53.63%
69	Pointe Du Marais	Osceola	\$8.27	54.18%
70	Deer Creek Estates	Volusia	\$4.34	54.91%
71	Wetlands	Lake	\$2.76	55.60%
72	Wetlands	Clarus	\$4.90	59.00%
73	Wetlands	Lake	\$2.52	60.38%
74	Wetlands	Lake	\$3.18	64.04%
75	Wetlands	Lake	\$1.00	100.00%

**SOUTHERN STATES UTILITIES  
WASTEWATER COMPARISON**
**RATIO OF NET CIAC TO NET PLANT - TO - MONTHLY CIAC REVENUE REQUIREMENTS PER CIAC**

Line No.	System	County	CIAC Rev Reqmt Per ERC	Ratio of Net CIAC To Net Plant
1	South Forty	Marion	\$0.23	0.20%
2	Sunny Hills Util	Washington	\$0.05	0.28%
3	Park Manor	Putnam	\$0.24	1.75%
4	Chuluota	Seminole	\$7.32	4.56%
5	Morningview	Lake	\$1.53	5.33%
6	Citrus Springs Util	Citrus	\$0.27	6.13%
7	Deltona Utilities	Volusia	\$1.38	6.24%
8	Citrus Park	Marion	\$3.96	8.45%
9	Marion Oaks Util	Marion	\$2.79	12.03%
10	Rain Port	Putnam	\$2.54	17.30%
11	Sunshine Parkway	Lake	\$8.65	18.23%
12	Burnt Store	Charl / Lee	\$3.89	20.24%
13	Apache Shores	Citrus	\$2.20	21.76%
14	Lellani Heights	Martin	\$3.77	21.97%
15	Jungle Den	Volusia	\$15.94	30.04%
16	Point O' Woods	Citrus	\$8.56	31.91%
17	Fisherman's Haven	Martin	\$3.00	33.80%
18	Woodmere	Duval	\$8.01	34.80%
19	Beecher's Point	Putnam	\$4.49	37.35%
20	Apple Valley	Seminole	\$4.36	40.02%
21	Palm Terrace	Pasco	\$3.49	46.34%
22	Silver Lake Oaks	Putnam	\$8.99	48.99%
23	Amelia Island	Nassau	\$20.98	51.06%
24	Marco Shores Util	Collier	\$18.70	54.50%
25	University Shores	Orange	\$19.06	55.21%
26	Fla. Cant. Comm. Pk.	Seminole	\$65.04	58.31%
27	Salt Springs	Marion	\$8.55	60.54%
28	Holiday Haven	Lake	\$6.18	62.62%
29	Zephyr Shores	Pasco	\$3.05	65.68%
30	Fox Run	Martin	\$26.12	73.78%
31	Spring Hill Util	Hernando	\$8.98	74.38%
32	Venetian Village	Lake	\$17.17	76.97%
33	Meredith Manor	Seminole	\$12.74	78.41%
34	Sugar Mill	Volusia	\$19.44	83.30%
35	Beacon Hills	Duval	\$17.80	90.08%
36	Leisure Lakes	Highlands	\$8.09	101.51%
37	Sugar Mill Woods	Citrus	\$33.43	209.89%
AVERAGE - SEWER			\$11.05	52.76%



**SOUTHERN STATES UTILITIES, INC.**  
 ...DATA FOR SYSTEM PLANNING AND DESIGNING SUBSIDY - WATER AND WASTEWATER

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## SOUTHERN STATES UTILITIES, INC.

## SUMMARY OF REVENUES AND BILLING DATA FOR SYSTEMS PAYING AND RECEIVING SUBSIDY - WATER

(Sorted by Revenue Subsidy)

(Sorted by Revenue Subsidy)																	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
							STAND ALONE		UNIFORM		REVENUE REQUIREMENT						
Line #	DESCRIPTION	County	Number Of Customers	Number Of BAs	Factored ERCs	Gallons Sold	Base Facility Charge	Gallage Charge	Base Facility Charge	Gallage Charge	System Revenue Requirement	Calculated Revenue Stand Alone	Calculated Revenue Uniform	Revenue Subsidy (12)-(13)	Revenue Subsidy Per ERC (14)/(5)	Average Consumption Per ERC (16)/(5)/(100)	Average Consumption Per Customer (16)/(3)/(100)
PAYING SUBSIDY																	
1	Spring Hill Ltd	Hamadish	22,628	271,533	303,822	2,295,838	\$3.88	\$0.89	\$5.00	\$1.19	\$3,749,226	3,664,021	4,842,157	(1,176,136)	(\$3.89)	9,227	12.25
2	Delaware Lakes	Volusia	21,671	262,447	263,628	2,655,963	\$4.03	\$1.11	\$5.00	\$1.19	\$4,203,631	4,091,140	4,576,736	(187,596)	(\$1.72)	9,354	12.23
3	Sugar Hill Woods	Coke	1,826	21,674	51,705	116,602	\$2.57	\$0.84	\$5.00	\$1.19	\$416,542	415,626	659,061	(243,454)	(\$1.71)	6,510	12.20
4	Sugar Lake Estates	Lake	1,213	14,554	16,250	260,971	\$3.51	\$0.52	\$5.00	\$1.19	\$203,762	199,762	401,605	(202,043)	(\$11.07)	14,130	12.19
5	Bayview Hills	Duval	2,662	31,202	32,102	439,572	\$5.04	\$0.82	\$5.00	\$1.19	\$519,413	506,663	560,991	(154,328)	(\$4.61)	11,131	12.18
6	University Shores	Orange	2,822	33,964	37,652	315,650	\$1.44	\$1.06	\$5.00	\$1.19	\$513,984	522,964	587,684	(64,720)	(\$1.72)	8,975	12.17
7	Amelia Island	Nassau	1,175	14,101	26,370	264,056	\$4.72	\$1.06	\$5.00	\$1.19	\$356,827	368,522	446,077	(57,554)	(\$2.18)	10,214	12.16
8	Apple Valley	Seminole	817	11,602	11,650	121,612	\$4.34	\$0.88	\$5.00	\$1.19	\$163,064	157,696	203,004	(45,368)	(\$3.90)	10,441	12.15
9	Woodcrest	Duval	1,075	12,900	17,652	180,565	\$4.75	\$0.39	\$5.00	\$1.19	\$265,496	262,635	300,162	(40,526)	(\$2.30)	10,236	12.14
10	Lake Heights	Martin	359	4,668	4,668	45,855	\$5.30	\$1.13	\$5.00	\$1.19	\$81,784	77,793	79,197	(1,405)	(\$0.30)	9,325	12.13
Sub-Total			56,337	577,965	768,725	7,116,714	\$3.98	\$0.96	\$5.00	\$1.19	10,542,751	10,286,734	12,761,895	(2,475,161)	(\$3.15)	8,450	12.12
RECEIVING SUBSIDY																	
11	Fort Terrace	Lake	122	1,460	1,496	11,150	\$4.45	\$1.27	\$5.00	\$1.19	\$21,523	20,827	20,759	68	\$0.05	7,443	12.11
12	Lake Hamlet Estates	Seminole	265	3,416	3,416	29,242	\$4.91	\$1.22	\$5.00	\$1.19	\$54,031	52,750	52,216	574	\$0.17	8,650	12.10
13	Pensola Island	Lake	132	1,568	1,602	11,868	\$5.01	\$1.44	\$5.00	\$1.19	\$25,560	25,170	22,162	2,988	\$1.86	7,782	12.09
14	Fisherman's Haven	Martin	157	1,646	1,646	9,304	\$4.43	\$1.66	\$5.00	\$1.19	\$23,278	22,745	19,312	3,434	\$2.06	6,577	12.08
15	Timothy Center	Lake	20	242	242	1,418	\$9.48	\$2.90	\$5.00	\$1.19	\$6,631	6,406	2,697	3,509	\$14.50	4,122	12.07
16	Cadogan Village	Lake	183	1,716	1,236	6,556	\$5.18	\$1.53	\$5.00	\$1.19	\$21,155	20,007	16,362	3,845	\$2.95	6,222	12.06
17	Samoa Villas	Martin	2	24	156	1,151	\$12.04	\$3.47	\$5.00	\$1.19	\$5,668	5,872	2,150	3,723	\$23.86	4,417	12.05
18	Stone Mountain	Lake	6	74	74	1,263	\$14.97	\$4.15	\$5.00	\$1.19	\$6,379	6,349	1,560	4,469	\$60.39	7,149	12.04
19	Harvest Manor	Seminole	674	6,062	9,121	72,366	\$4.73	\$1.29	\$5.00	\$1.19	\$141,261	137,450	132,731	4,719	\$5.51	7,121	12.03
20	Palms Harbor Home Pt.	Lake	64	730	730	2,107	\$9.48	\$1.90	\$5.00	\$1.19	\$11,048	10,924	6,157	4,766	\$6.55	6,227	12.02
21	Wooden	Putnam	11	206	206	413	\$17.51	\$1.31	\$5.00	\$1.19	\$6,937	6,862	1,521	5,361	\$26.02	5,361	12.01
22	Lake Bandy	Seminole	66	796	796	7,056	\$7.46	\$1.79	\$5.00	\$1.19	\$19,128	18,568	12,377	6,192	\$7.75	6,192	12.00
23	Shirley	Lake	115	1,376	1,376	5,330	\$7.33	\$1.54	\$5.00	\$1.19	\$20,479	19,693	15,223	6,671	\$4.65	6,671	11.99
24	Harborview	Lake	15	414	552	1,520	\$7.93	\$2.64	\$5.00	\$1.19	\$13,773	13,670	6,949	6,721	\$12.18	6,721	11.98
25	Orlando Park	Lake	13	226	226	1,140	\$13.11	\$5.57	\$5.00	\$1.19	\$9,358	9,339	2,497	6,842	\$20.01	6,842	11.97
26	Orlando Park	Martin	153	4,230	4,230	24,629	\$4.35	\$1.59	\$5.00	\$1.19	\$61,566	57,561	56,459	7,102	\$1.68	6,222	11.96
27	Harvest Manor	Seminole	64	764	764	8,065	\$8.71	\$1.75	\$5.00	\$1.19	\$25,461	25,128	17,766	7,362	\$4.65	7,362	11.95
28	Yonkers Village	Lake	151	1,570	1,570	8,333	\$6.77	\$1.73	\$5.00	\$1.19	\$25,461	25,128	17,766	7,362	\$4.65	7,362	11.94
29	Harvest	Orange	122	1,466	1,466	11,353	\$6.19	\$1.69	\$5.00	\$1.19	\$29,262	28,312	29,576	7,436	\$5.07	7,436	11.93
30	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.92
31	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.91
32	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.90
33	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.89
34	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.88
35	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.87
36	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.86
37	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.85
38	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.84
39	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.83
40	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.82
41	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.81
42	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.80
43	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.79
44	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.78
45	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.77
46	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.76
47	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.75
48	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.74
49	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.73
50	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.72
51	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.71
52	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.70
53	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.69
54	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.68
55	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.67
56	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.66
57	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.65
58	Harvest	Orange	11	156	156	368	\$35.00	\$5.54	\$5.00	\$1.19	\$8,662	8,673	1,226	7,445	\$47.12	7,445	11.64
59	Harvest	Orange	11	156	156	368	\$35.00	\$5.									



UTHERN STATES UTILITIES, INC  
SUMMARY OF REVENUES AND BILLING DATA FOR SYSTEMS PAYING AND RECEIVING SUBSIDY - WATER  
Filed by Previous Subsidy

(Rev. 10-1-79)

Line Item	Description	Country		Of Customer	Number	DEB#	Number	EFC#	Sales	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change	Base Charge	Change
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Line	Entity Name	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	2100	2101	2102	2103	2104	2105	2106	2107	2108	2109	2110	2111	2112	2113	2114	2115	2116	2117	2118	2119	2120	2121	2122	2123	2124	2125	2126	2127	2128	2129	2130	2131	2132	2133	2134	2135	2136	2137	2138	2139	2140	2141	2142	2143	2144	2145	2146	2147	2148	2149	2150	2151	2152	2153	2154	2155	2156	2157	2158	2159	2160	2161	2162	2163	2164	2165	2166	2167	2168	2169	2170	2171	2172	2173	2174	2175	2176	2177	2178	2179	2180	2181	2182	2183	2184	2185	2186	2187	2188	2189	2190	2191	2192	2193	2194	2195	2196	2197	2198	2199	2200	2201	2202	2203	2204	2205	2206	2207	2208	2209	2210	2211	2212	2213	2214	2215	2216	2217	2218	2219	2220	2221	2222	2223	2224	2225	2226	2227	2228	2229	2230	2231	2232	2233	2234	2235	2236	2237	2238	2239	2240	2241	2242	2243	2244	2245	2246	2247	2248	2249	2250	2251	2252	2253	2254	2255	2256	2257	2258	2259	2260	2261	2262	2263	2264	2265	2266	2267	2268	2269	2270	2271	2272	2273	2274	2275	2276	2277	2278	2279	2280	2281	2282	2283	2284	2285	2286	2287	2288	2289	2290	2291	2292	2293	2294	2295	2296	2297	2298	2299	2300	2301	2302	2303	2304	2305	2306	2307	2308	2309	2310	2311	2312	2313	2314	2315	2316	2317	2318	2319	2320	2321	2322	2323	2324	2325	2326	2327	2328	2329	2330	2331	2332	2333	2334	2335	2336	2337	2338	2339	2340	2341	2342	2343	2344	2345	2346	2347	2348	2349	2350	2351	2352	2353	2354	2355	2356	2357	2358	2359	2360	2361	2362	2363	2364	2365	2366	2367	2368	2369	2370	2371	2372	2373	2374	2375	2376	2377	2378	2379	2380	2381	2382	2383	2384	2385	2386	2387	2388	2389	2390	2391	2392	2393	2394	2395	2396	2397	2398	2399	2400	2401	2402	2403	2404	2405	2406	2407	2408	2409	2410	2411	2412	2413	2414	2415	2416	2417	2418	2419	2420	2421	2422	2423	2424	2425	2426	2427	2428	2429	2430	2431	2432	2433	2434	2435	2436	2437	2438	2439	2440	2441	2442	2443	2444	2445	2446	2447	2448	2449	2450	2451	2452	2453	2454	2455	2456	2457	2458	2459	2460	2461	2462	2463	2464	2465	2466	2467	2468	2469	2470	2471	2472	2473	2474	2475	2476	2477	2478	2479	2480	2481	2482	2483	2484	2485	2486	2487	2488	2489	2490	2491	2492	2493	2494	2495	2496	2497	2498	2499	2500
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**SOUTHERN STATES UTILITIES, INC.**  
**SUMMARY OF WATER CIRC. LEVEL BY SYSTEM AND RELATED REVENUE REQUIREMENTS**  
(Issued By Review Subject)

Line Item	Location	County	Number of Customers	NET CAC TO NET PLANT RATIO				CAC REVENUE REQUIREMENT										MONTHLY REVENUE REQUIREMENT PER LINE																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
				Net CAC	Net Plant	Ratio	Ratio	Rate Base	Rate Base	CAC	Rate Base	CAC	Rate Base	CAC	Rate Base	CAC	Rate Base	CAC	Rate Base	CAC	Rate Base																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
1	Spring Hill	Hamilton	21,628	11,947,915	15,368,982	51.28%	11,801,000%	631,801	207,570	1,066,573	1,127,772	\$1,749,226	11,176,194	201,022	\$1.75																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								</

### SUMMARY OF WATER O&M LEVEL BY SYSTEM AND RELATED REVENUE REQUIREMENTS

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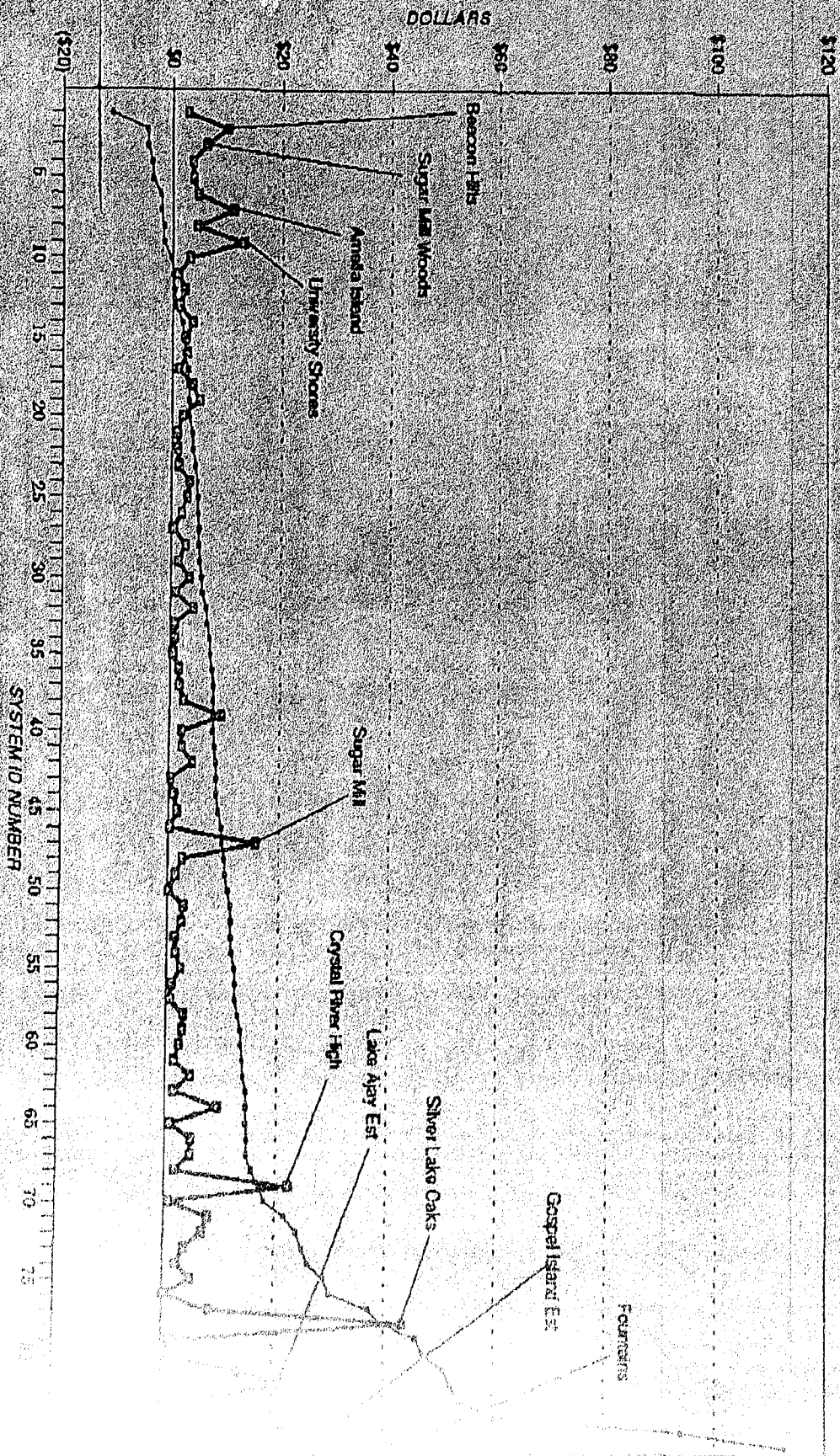


**SOUTHERN STATES UTILITIES, INC.**  
**SUMMARY OF SEVER CAC LEVEL BY SYSTEM AND RELATED REVENUE REQUIREMENTS**  
 (Based on Revenue Study)

Line No.	Description	County	Number of Customers	SEI CAC TO NET PLANT RATIO				CAC REVENUE REQUIREMENT										MONTHLY REVENUE REQUIREMENT PER EIC				
				Net Plant	Net CAC	CAC LEVEL	Rate Base	Rate Base	CAC	CAC	Rate Base	Total	CAC	Rate Base	Total	System Revenue	Revenue	Per System	Per EIC	Per EIC	Per EIC	Per EIC
				Full	Full	Level	Factor	Factor	Level	Level	Factor	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level
1	Spring Hill	Hamilton	4,446	4,215,493	(3,135,349)	74.38%	13,801,000%	412,719	318,674	551,255	577,075	1,531,657	706,572	64,318	\$6.92							
2	Spring Hill	David	1,714	2,159,136	(1,426,961)	209.60%	13,801,000%	610,977	82,742	693,719	776,467	1,562,715	128,571	21,771	\$3.43							
3	Spring Hill	David	2,469	1,225,076	(2,805,748)	54.06%	13,801,000%	401,031	105,533	506,564	596,434	1,103,478	109,426	29,504	\$1.30							
4	Spring Hill	Madison	1,005	1,966,475	(2,005,548)	54.06%	13,801,000%	280,946	78,602	359,548	376,910	736,458	103,526	17,770	\$2.38							
5	Spring Hill	Orange	2,562	5,756,819	(3,175,146)	52.71%	13,801,000%	439,791	125,475	565,266	605,560	1,170,826	111,526	\$19.26								
6	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
7	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
8	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
9	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
10	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
11	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
12	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
13	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
14	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
15	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
16	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
17	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
18	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
19	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
20	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
21	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
22	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
23	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
24	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
25	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
26	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
27	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
28	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
29	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
30	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
31	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
32	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
33	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
34	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
35	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
36	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
37	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
38	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
39	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
40	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
41	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
42	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
43	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
44	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
45	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
46	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
47	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
48	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
49	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
50	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
51	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
52	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
53	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
54	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
55	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
56	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
57	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
58	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							
59	Spring Hill	Orange	6	1,181,501	(1,016,551)	63.62%	13,801,000%	13,501	4,678	18,179	19,031	37,210	10,459	6,232	\$1.65							

# **SOUTHERN STATES UTILITIES WATER COMPARISON**

Revenue Subsidy to CIAC Revenue Requirement Monthly, Per ERC



Monthly Rev Subsidy Per ERC

Monthly CIAC Rev Reqmt Per ERC

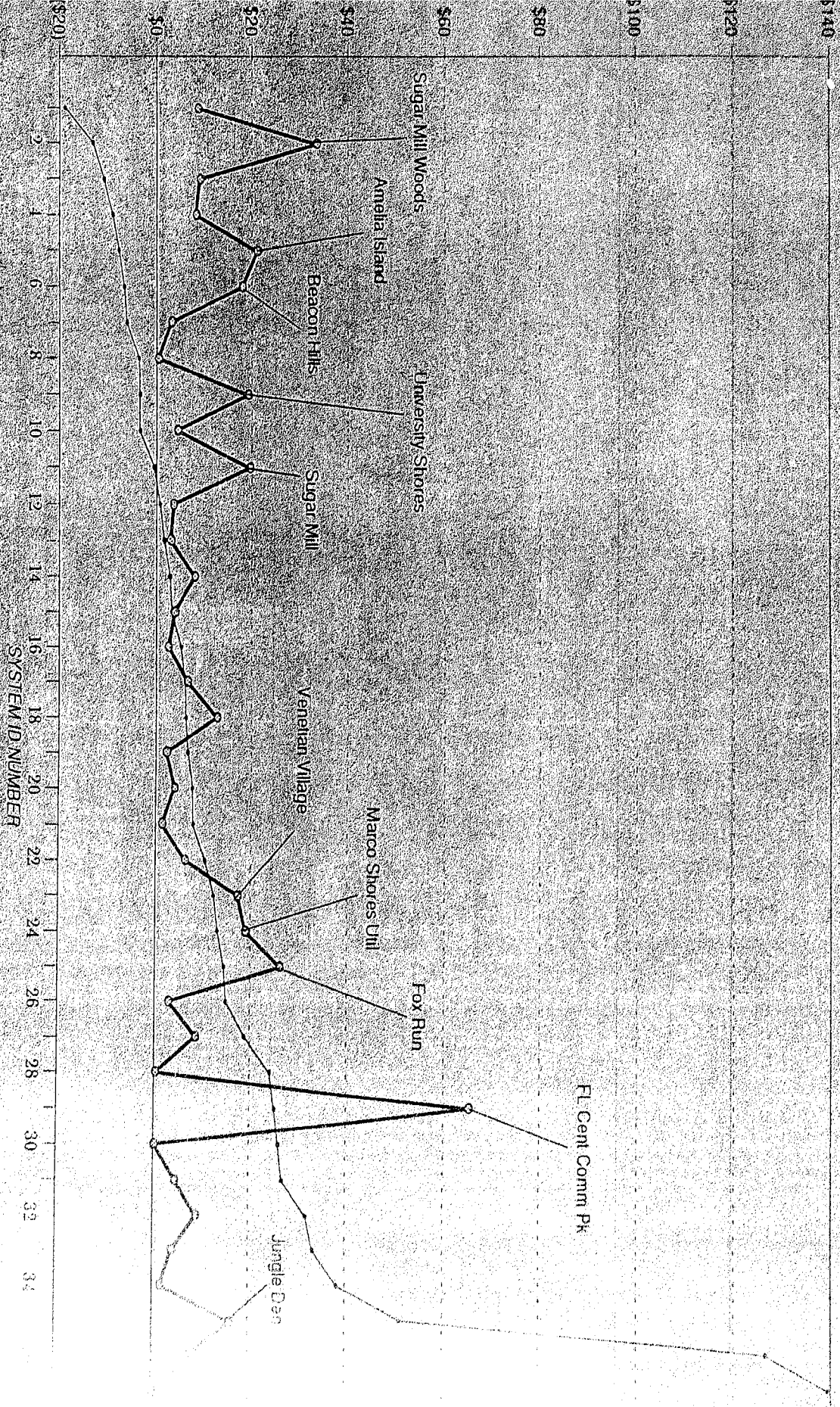
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# SOUTHERN STATES UTILITIES

## WASTEWATER COMPARISON

Revenue Subsidy to CIAC Revenue Requirement (Monthly, Per ERC)



Monthly Rev. Subsidy Per ERC

Monthly CIAC Rev. Reqmt. Per ERC

**SOUTHERN STATES UTILITIES  
WATER COMPARISON  
REVENUE SUBSIDY TO CIAC REVENUE REQUIREMENTS (MONTHLY, PER ERC)**

Page 3 of 4

Line No.	System	County	Revenue Subsidy Per ERC	CIAC Rev Reqmt Per ERC
1	Silver Lake Estates	Lake	\$11.07	\$2.72
2	Beacon Hills	Duval	\$4.81	\$10.00
3	Sugar Mill Woods	Citrus	\$4.71	\$8.09
4	Apple Valley	Seminole	\$3.90	\$3.65
5	Spring Hill Utl	Hernando	\$3.83	\$3.75
6	Woodmere	Duval	\$2.90	\$4.52
7	Amelia Island	Nassau	\$2.18	\$10.92
8	Deltona Utilities	Volusia	\$1.72	\$4.04
9	University Shores	Orange	\$1.72	\$12.75
10	Leland Heights	Manon	\$0.20	\$3.57
11	Fern Terrace	Lake	\$0.05	\$0.88
12	Lake Hamel Estates	Seminole	\$0.17	\$2.13
13	Meredith Manor	Seminole	\$0.81	\$1.25
14	Citrus Park	Manon	\$1.86	\$3.65
15	Piccola Island	Lake	\$1.86	\$2.35
16	Fisherman's Haven	Manon	\$2.08	\$2.57
17	Druid Hills	Seminole	\$2.86	\$1.03
18	Canion Village	Lake	\$2.95	\$3.70
19	Pine Ridge Estates	Citrus	\$3.02	\$4.91
20	Imperial Mobile Terr	Lake	\$3.03	\$1.71
21	Fern Park	Seminole	\$3.73	\$0.94
22	Keystone Heights	Clay	\$3.82	\$0.98
23	Piney Woods	Lake	\$4.39	\$1.08
24	Venetaan Village	Lake	\$4.60	\$3.18
25	Oakwater Shores	Orange	\$4.79	\$2.71
26	Skycrest	Lake	\$4.85	\$1.75
27	East Lk Harris Em	Lake	\$5.03	\$0.24
28	Westmont	Orange	\$5.07	\$2.58
29	Romona Park	Putnam	\$5.28	\$1.24
30	Oak Forest	Citrus	\$5.37	\$3.34
31	Tropical Park	Osceola	\$5.70	\$0.87
32	Point O' Woods	Citrus	\$6.33	\$4.73
33	Palms Mobile Home Pk	Lake	\$6.53	\$0.21
34	River Park	Putnam	\$7.05	\$0.62
35	Hobby Hills	Lake	\$7.22	\$0.26
36	Zephyr Shores	Pasco	\$7.46	\$1.42
37	Interlachen Lk Est	Putnam	\$7.73	\$1.50
38	Lake Branley	Seminole	\$7.78	\$2.37
39	Pine Ridge Estates	Osceola	\$7.80	\$9.27
40	Palm Port	Putnam	\$7.82	\$2.01
41	Citrus Springs Utl	Citrus	\$8.10	\$2.14
42	Laurel Lakes	Highlands	\$8.40	\$4.09
43	Oakwood	Brevard	\$8.53	\$0.14
44	Golden Terrace	Citrus	\$8.53	\$0.78
45	Lake Conway Park	Orange	\$8.87	\$1.45
46	Harmony Homes	Seminole	\$8.82	\$0.11
47	Sugar Mill	Volusia	\$9.68	\$15.88
48	Apache Shores	Citrus	\$10.14	\$2.42
49	St. John's Highlands	Putnam	\$10.32	\$1.17
50	Kingswood	Brevard	\$10.76	\$0.04
51	Holiday Haven	Lake	\$11.35	\$2.76
52	Sunny Hills Utl	Washington	\$11.38	\$2.37
53	Jungle Den	Volusia	\$11.46	\$1.25
54	Dol Roy Manor	Seminole	\$11.59	\$1.39
55	Holiday Heights	Orange	\$12.14	\$2.38
56	Morningview	Lake	\$12.18	\$0.81
57	Hermis Cove	Putnam	\$12.23	\$0.50
58	Chuluota	Seminole	\$12.81	\$2.97
59	Postmaster Village	Clay	\$13.44	\$2.82
60	River Grove	Putnam	\$13.51	\$2.18
61	Palm Terrace	Pasco	\$13.87	\$1.42
62	Beacher's Point	Putnam	\$13.93	\$4.35
63	Friendly Center	Lake	\$14.50	\$1.38
64	Windsong	Osceola	\$14.52	\$9.39
65	Saratoga Harbour	Putnam	\$14.57	\$0.85
66	Grand Terrace	Lake	\$14.72	\$4.61
67	Manon Oaks Utl	Manon	\$14.72	\$4.53
68	Bay Lake Estates	Osceola	\$15.76	\$1.75
69	Crystal River Highl	Citrus	\$17.20	\$22.25
70	Intercession City	Osceola	\$17.95	\$0.69
71	Marco Shores Utl	Collier	\$21.76	\$7.73
72	Samra Village	Manon	\$23.88	\$6.88
73	Burnt Store	Charl/ Lee	\$24.92	\$3.48
74	Wapleins	Putnam	\$26.02	\$2.17
75	Reeking Green/Rosemont	Citrus	\$28.79	\$9.00
76	Chapel Ridge	Lake	\$30.01	\$0.06
77	Deer Park Parkway	Lake	\$37.05	\$8.23
78	Palmdale Village	Putnam	\$39.61	\$33.13
79	Palmdale Hills	Manon	\$46.79	\$1.44
80	Palmdale Hills	Lake	\$47.10	\$1.00
81	Palmdale Hills	Manon	\$50.64	\$14.91
82	Palmdale Hills	Manon	\$52.17	\$2.18
83	Palmdale Hills	Manon	\$53.67	\$0.10
84	Palmdale Hills	Manon	\$60.34	\$1.07
85	Palmdale Hills	Manon	\$94.01	\$0.10
86	Palmdale Hills	Manon	\$112.11	\$2.18

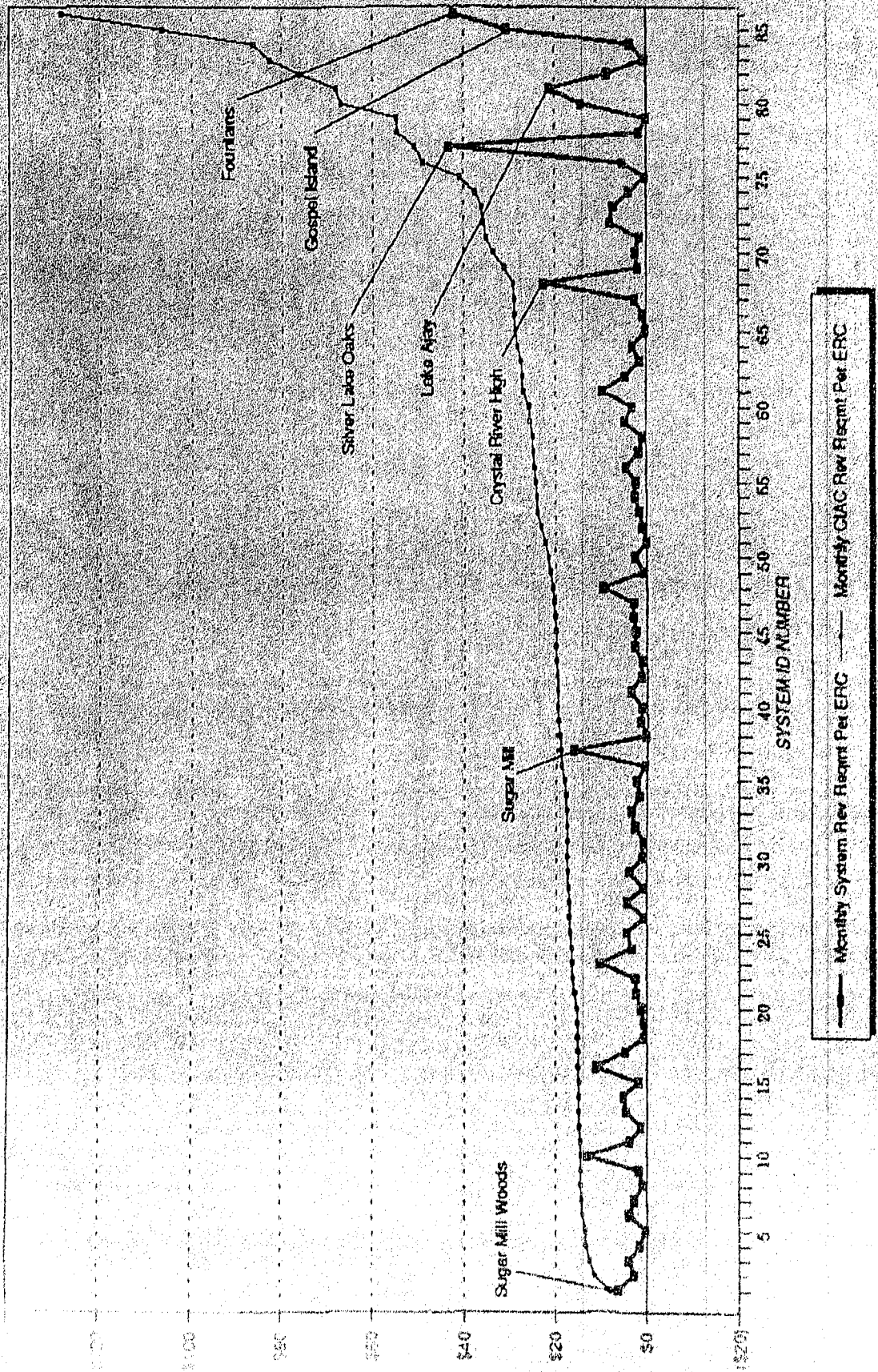


# WASTEWATER COMPARISON REVENUE SUBSIDY TO CIAC REVENUE REQUIREMENTS (MONTHLY, PER ERC)

Line No.	System	County	Revenue Subsidy Per ERC	CIAC Rev Reqmt Per ERC
1	Sunshine Parkway	Lake	(\$18.82)	\$8.85
2	Sugar Mill Woods	Citrus	(\$13.11)	\$33.48
3	Spring Hill Util	Hernando	(\$10.89)	\$8.98
4	Leisure Lakes	Highlands	(\$9.00)	\$8.09
5	Amelia Island	Nassau	(\$7.79)	\$20.98
6	Beacon Hills	Duval	(\$6.69)	\$17.80
7	Zephyr Shores	Pasco	(\$6.17)	\$3.05
8	Citrus Springs Util	Citrus	(\$3.65)	\$0.27
9	University Shores	Orange	(\$3.51)	\$19.08
10	Apple Valley	Seminole	(\$3.45)	\$4.36
11	Sugar Mill	Volusia	(\$0.53)	\$19.44
12	Palm Terrace	Pasco	\$0.68	\$3.49
13	Fisherman's Haven	Martin	\$1.63	\$3.00
14	Woodmere	Duval	\$2.87	\$8.01
15	Lillian Heights	Martin	\$3.20	\$3.77
16	Palm Port	Putnam	\$5.14	\$2.54
17	Salt Springs	Marion	\$6.10	\$8.55
18	Meredith Manor	Seminole	\$6.20	\$12.74
19	Apache Shores	Citrus	\$6.63	\$2.20
20	Burnt Store	Charl / Lee	\$7.74	\$3.89
21	Deltona Utilities	Volusia	\$7.80	\$1.38
22	Holiday Haven	Lake	\$10.34	\$6.18
23	Venetian Village	Lake	\$12.20	\$17.17
24	Marco Shores Util	Collier	\$13.07	\$18.70
25	Fox Run	Martin	\$14.46	\$26.12
26	Marion Oaks Util	Marion	\$14.91	\$2.79
27	Point O' Woods	Citrus	\$18.83	\$8.56
28	Park Manor	Putnam	\$24.12	\$0.24
29	Fla. Cent. Comm. Pk	Seminole	\$25.13	\$65.04
30	Sunny Hills Util	Washington	\$26.10	\$0.05
31	Beecher's Point	Putnam	\$26.84	\$4.49
32	Silver Lake Oaks	Putnam	\$31.88	\$8.99
33	Citrus Park	Marion	\$33.33	\$3.96
34	Morningview	Lake	\$38.34	\$1.53
35	Jungle Den	Volusia	\$51.10	\$15.94
36	Chuluota	Seminole	\$126.64	\$7.32
37	South Forty	Marion	\$139.43	\$0.23
AVERAGE - WASTEWATER				\$11.05

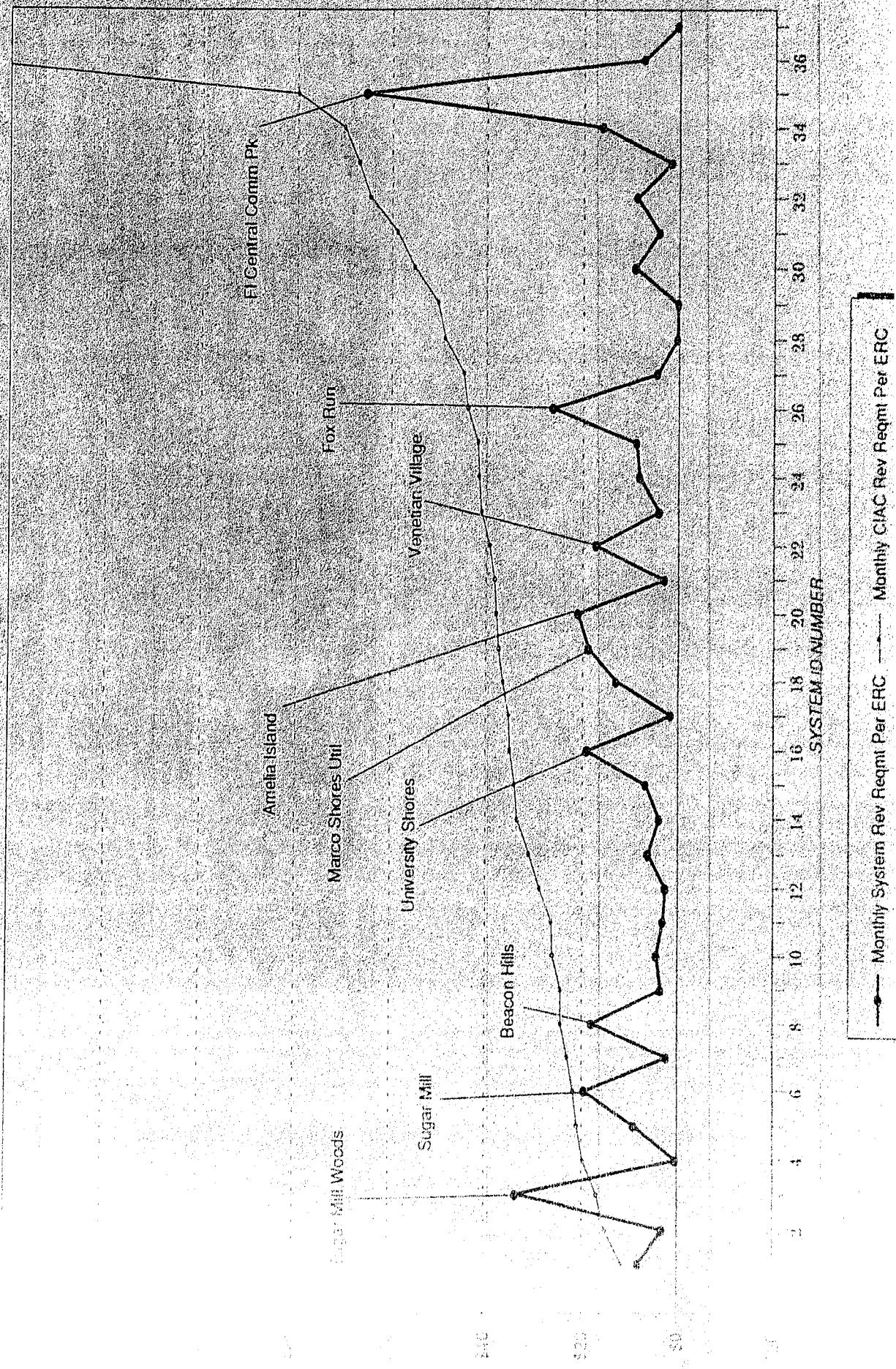
# **SOUTHERN STATES UTILITIES WATER COMPARISON**

**System Revenue Requirement to CIAC Revenue Requirement (Monthly, Per ERC)**





# SOUTHERN STATES UTILITIES WASTEWATER COMPARISON System Revenue Requirement to CIAC Revenue Requirement (Monthly, Per ERC)



**SOUTHERN STATES UTILITIES  
WATER COMPARISON  
SYSTEM REVENUE REQUIREMENTS TO CIAC REVENUE REQUIREMENTS (MONTHLY, PER ERC)**

Exhibit  
Page 3 of 4

Line No.	System	County	CIAC Rev Reqmt Per ERC	System Rev Reqmt Per ERC
1	Sugar Mill Woods	Citrus	\$8.09	\$8.08
2	Silver Lake Estates	Lake	\$2.72	\$11.17
3	Spring Hill Util.	Hernando	\$3.75	\$12.37
4	Zephyr Shores	Pasco	\$1.42	\$13.12
5	East Lk Harris Est.	Lake	\$0.24	\$13.24
6	Apple Valley	Seminole	\$3.65	\$14.00
7	Risherman's Haven	Manion	\$2.57	\$14.13
8	Fern Terrace	Lake	\$0.86	\$14.37
9	Imperial Mobile Terr.	Lake	\$1.71	\$14.44
10	University Shores	Orange	\$12.75	\$14.43
11	Citrus Park	Manion	\$3.65	\$14.58
12	Pomona Park	Pulham	\$1.24	\$14.62
13	Dakota Utilities	Volusia	\$4.34	\$14.82
14	Pine Ridge Utilities	Citrus	\$4.91	\$14.88
15	Skycrest	Lake	\$1.75	\$14.88
16	Amelia Island	Nassau	\$10.92	\$15.01
17	Woodmere	Duval	\$4.52	\$15.04
18	River Park	Pulham	\$0.62	\$15.08
19	Palms Mobile Home Pk.	Lake	\$0.51	\$15.13
20	Meredith Manor	Seminole	\$1.25	\$15.15
21	Lake Hammer Estates	Seminole	\$2.13	\$16.73
22	Piccolo Island	Lake	\$2.35	\$15.97
23	Beacon Hills	Duval	\$10.00	\$18.18
24	Venetian Village	Lake	\$3.18	\$18.23
25	Poin O' Woods	Citrus	\$4.13	\$18.70
26	Tropical Park	Osceola	\$0.67	\$18.76
27	Leisure Lakes	Highlands	\$4.09	\$18.85
28	Fern Park	Seminole	\$0.94	\$17.03
29	Carlton Village	Lake	\$3.70	\$17.14
30	Keystone Heights	Clay	\$0.98	\$17.23
31	Golden Terrace	Citrus	\$0.78	\$17.25
32	Apache Shores	Citrus	\$2.42	\$17.28
33	Lorain Heights	Manion	\$3.17	\$17.45
34	Interlachen Lk Est.	Pulham	\$1.50	\$17.40
35	Palm Port	Pulham	\$2.01	\$17.82
36	Hooby Hills	Lake	\$0.26	\$18.32
37	Sugar Mill	Volusia	\$15.68	\$18.76
38	Oakwood	Brevard	\$0.14	\$19.03
39	Jungle Den	Volusia	\$1.25	\$19.31
40	St. John's Highlands	Pulham	\$1.17	\$19.55
41	Oak Forest	Citrus	\$3.34	\$19.54
42	Piney Woods	Lake	\$1.08	\$19.63
43	Druid Hills	Seminole	\$1.03	\$19.83
44	Westmont	Orange	\$2.58	\$19.96
45	Citrus Springs Util.	Citrus	\$2.14	\$19.98
46	Holiday Haven	Lake	\$2.78	\$20.01
47	Oakwyler Shores	Orange	\$2.71	\$20.28
48	Pine Ridge Estates	Osceola	\$9.27	\$20.51
49	Hermits Cove	Pulham	\$0.50	\$20.93
50	Sunny Hills Util.	Washington	\$2.37	\$21.32
51	Kingswood	Brevard	\$0.04	\$22.17
52	Safelogs Harbour	Pulham	\$0.65	\$23.06
53	Lake Conway Park	Orange	\$1.45	\$23.84
54	Lake Brantley	Seminole	\$2.37	\$24.03
55	River Grove	Pulham	\$2.18	\$24.19
56	Beachers Point	Pulham	\$4.35	\$24.45
57	Palm Terrace	Pasco	\$1.42	\$24.78
58	Morningview	Lake	\$0.81	\$24.95
59	Manion Oaks Util.	Manion	\$4.53	\$25.56
60	Chulola	Seminole	\$2.97	\$26.68
61	Windsong	Osceola	\$0.39	\$26.94
62	Grand Terrace	Lake	\$4.61	\$27.14
63	Friendly Center	Lake	\$1.38	\$27.40
64	Postmaster Village	Clay	\$2.82	\$28.23
65	Harmony Homes	Seminole	\$0.11	\$28.60
66	Intercession City	Osceola	\$0.69	\$28.93
67	Holiday Heights	Orange	\$2.38	\$28.98
68	Crystal River Highl.	Citrus	\$22.25	\$29.16
69	Bay Lake Estates	Osceola	\$1.75	\$31.20
70	Wootches	Pulham	\$2.17	\$33.67
71	Dal Ray Manor	Seminole	\$1.35	\$35.32
72	Matiza Shores Util.	Collier	\$7.73	\$35.84
73	Swanwick Village	Manion	\$6.88	\$36.33
74	Burnt Store	Charl / Lee	\$3.48	\$37.78
75	Quail Ridge	Lake	\$0.06	\$41.09
76	Redfish Creek (Brevard)	Citrus	\$5.00	\$49.00
77	Quail Creek Util.	Pulham	\$43.13	\$50.82
78	Quail Creek Util.	Manion	\$1.44	\$54.67
79	Quail Creek Util.	Clay	\$0.00	\$54.82
80	Quail Creek Util.	Manion	\$14.04	\$66.87
81	Quail Creek Util.	Manion	\$21.02	\$67.81
82	Quail Creek Util.	Manion	\$0.23	\$75.41
83	Quail Creek Util.	Manion	\$0.32	\$82.58
84	Quail Creek Util.	Manion	\$3.42	\$86.28
85	Quail Creek Util.	Manion	\$30.46	\$100.30
86	Quail Creek Util.	Manion	\$22.77	\$100.30



**SOUTHERN STATES UTILITIES  
WASTEWATER COMPARISON**

Exhibit (FLL-4)

Page 4 of 4

**SYSTEM REVENUE REQUIREMENTS TO CIAC REVENUE REQUIREMENTS (MONTHLY, PER ERC)**

Line No.	System	County	CIAC Rev Reqmt Per ERC	System Rev Reqmt Per ERC
1	Leisure Lakes	Highlands	\$8.09	\$11.52
2	Zephyr Shores	Pasco	\$3.05	\$15.03
3	Sugar Mill Woods	Citrus	\$33.43	\$16.85
4	Citrus Springs Util	Citrus	\$0.27	\$19.77
5	Spring Hill Util	Hernando	\$8.98	\$21.02
6	Sugar Mill	Volusia	\$19.44	\$21.87
7	Apache Shores	Citrus	\$2.20	\$22.93
8	Beacon Hills	Duval	\$17.80	\$24.41
9	Palm Terrace	Pasco	\$3.49	\$24.43
10	Apple Valley	Seminole	\$4.36	\$26.08
11	Fisherman's Haven	Martin	\$3.00	\$26.36
12	Palm Port	Putnam	\$2.54	\$28.78
13	Holiday Haven	Lake	\$9.18	\$31.00
14	Lallan Heights	Martin	\$3.77	\$33.46
15	Salt Springs	Marion	\$6.55	\$34.04
16	University Shores	Orange	\$19.06	\$35.04
17	Deltona Utilities	Volusia	\$1.38	\$35.29
18	Meredith Manor	Seminole	\$12.74	\$36.47
19	Marco Shores Util	Collier	\$18.70	\$37.45
20	Amelia Island	Nassau	\$20.98	\$37.80
21	Marion Oaks Util	Marion	\$2.79	\$38.19
22	Venetian Village	Lake	\$17.17	\$39.23
23	Burnt Store	Charl / Lee	\$3.89	\$40.94
24	Woodmere	Duval	\$8.01	\$41.43
25	Point O Woods	Citrus	\$8.56	\$41.71
26	Fox Run	Martin	\$28.12	\$43.86
27	Beecher's Point	Putnam	\$4.49	\$44.70
28	Park Manor	Putnam	\$0.24	\$48.66
29	Sunny Hills Util	Washington	\$0.05	\$50.13
30	Silver Lake Oaks	Putnam	\$8.99	\$55.05
31	Citrus Park	Marion	\$3.96	\$58.65
32	Sunshine Parkway	Lake	\$8.65	\$64.42
33	Morningview	Lake	\$1.53	\$66.97
34	Jungle Den	Volusia	\$15.94	\$68.98
35	Fla. Cent. Comm. Pk	Seminole	\$65.04	\$79.93
36	Chuluota	Seminole	\$7.32	\$152.42
37	South Forty	Marion	\$0.23	\$200.77
AVERAGE - WASTEWATER			\$11.05	\$30.79