

ORIGINAL
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE; Application for Rate Increase)
in Citrus County by Southern States) Docket No. 920199-WS
Utilities, Inc.)
_____)

APPLICATION FOR INTERVENTION

Comes now CYPRESS AND OAK VILLAGES ASSOCIATION of Homosassa, Florida and files this application to intervene in the above identified application, and in support thereof states and alleges as follows:

1. CYPRESS AND OAK VILLAGES ASSOCIATION is a voluntary association of approximately 1100 householders residing within the service area served by Southern States Utilities, Inc. The Association was formed under Articles of Incorporation filed on August 18, 1980.

2. As shown in the attached exhibits the Association and its members have a number of special concerns over being lumped into common rate setting procedures for all 127 systems.

3. The Association and its members have never been properly apprised of the resolution of the previous rate case Docket No. 900329-WS.

4. Rate case synopsis available for study at various locations contains deceptive material and does not include testimony of utility personnel and consultants.

5. The address of the Association is:

91 Cypress Boulevard West
Homosassa, Florida 34446

Telephone: 904-382--1145

Respectfully submitted this 14th day of August, 1992



HARRY C. JONES, P.E. President
Cypress and Oak Villages Association

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DOCUMENT NUMBER-DATE
09187 AUG 17 1992
FPSC-RECORDS/REPORTING

EXHIBIT LIST

CYPRESS AND OAK VILLAGES ASSOCIATION (COVA) representing the homeowners at Sugarmill Woods (SMW) in Citrus County, has prepared the following exhibits

- Exhibit A Pages 1-4 Highlights the confusing and deceptive information presented by the Utility to its customers.**
- Exhibit B Page 1 Shows the staff recommended interim rates and notes COVA comments on the bottom of the page.**
- Exhibit C Pages 1&2 Provides a true comparison between the current staff recommendations in this rate case and those in previous case Docket No. 900329-WS.**

Letter August 10, 1992 Addresses following items:

- Lack of timely notice**
- Incorrect determination of ERC's.**
- Incorrect determination of used and useful.**
- Incorrect sewer cap.**
- Incorrect sewer charge.**
- Incorrect fire protection reserve**
- Excessive customer notification charges.**
- New wells included in 1991 went on stream in April 1992.**
- Base Facility Charge excessive.**
- Exhibit A Pages 1-5**
- Exhibit B Page 1**

**SUGAR MILL WOODS
CITRUS COUNTY
(Monthly Rates)**

(SSU MAILING ON RATES TO SMW CUSTOMERS EARLY AUGUST 1992.)

CLASS/ METER SIZE	PRESENT RATES	PROPOSED RATES	
		INTERIM	FINAL
PRESENT RATES		1990 INTERIM	
<u>WATER</u>			
Residential and General Service			
\$2.00	5/8" x 3/4"	\$2.67	\$7.64
3.00	3/4"	\$4.00	\$11.48
5.00	1"	\$6.67	\$19.10
10.00	1 1/2"	\$13.35	\$38.20
16.00	2"	\$21.35	\$61.12
	3"	\$42.69	\$122.24
	4"	\$66.71	\$191.00
	6"	\$133.42	\$382.00
	8"	---	\$654.40
	10"	---	\$878.60
\$0.58 / M gal			
Gallonge Charge (per 1,000 gallons)		\$0.77	\$0.75

Above column
added by COVA

Above 1990
Interim rates
still being
charged at SMW

MISCELLANEOUS SERVICE CHARGES

Initial Connection	\$15.00	No Change	No Change
Normal Reconnection	\$15.00	No Change	No Change
Violation Reconnection	\$15.00	No Change	No Change
Premises Visit	\$10.00	No Change	No Change

CLASS/ METER SIZE	PRESENT RATES	PROPOSED RATES	
		INTERIM	FINAL
<u>WASTEWATER</u>			
Residential Service			
	5/8" x 3/4"	\$8.06	\$5.87
	3/4"	\$8.06	\$8.81
	1"	\$8.06	\$14.68
	1 1/2"	\$8.06	\$29.35
	2"	\$8.06	\$46.96
	3"	\$8.06	\$93.92
	4"	\$8.06	\$146.75
	6"	\$8.06	\$293.50
	8"	---	\$469.60
	10"	---	\$675.05

Gallonge Charge (per 1,000 gallons)			
0 - 6,000 gallons	\$2.21	\$0.92	\$0.99
6,001 - 10,000 gallons	No Charge	\$0.92	\$0.99
All Excess Gallons	No Charge	No Charge	No Charge

General Service			
	5/8" x 3/4"	8.06	5.87
	3/4"	\$12.09	\$8.81
	1"	\$20.13	\$14.68
	1 1/2"	\$40.27	\$29.35
	2"	\$64.43	\$46.96
	3"	\$128.86	\$93.92
	4"	\$201.34	\$146.75
	6"	---	\$293.50
	8"	---	\$469.60
	10"	---	\$675.05

Gallonge Charge (per 1,000 gallons)			
All Gallons	\$2.65	\$0.92	\$0.99

COVA contends that SSU mislead and deceived SMW customers by quoting the 1990 Interim rates instead of the true Present rates. This deception appears designed to conceal the real extent of the rate increase as demonstrated in page 2 of this Exhibit. One of our residents complains about a 45% billing increase when, in fact, it is 94% for 10,000 gal/mo with a 5/8" X 3/4" meter as depicted in the chart on page 3 of this Exhibit. This same deceit was compounded by the wrong rates being fed to the news media.

BLH
8/12/92

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copy

75 Sycamore Circle
Homosassa, FL 34446
August 4, 1992

Director, Div. of Records & Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0650

Re: Docket # 920199-WS-In
re: Application of Southern
States Utilities, Inc. For
Increased Water and Wastewater
Rates in Citrus County at
Sugarmill Woods.

Dear Director;

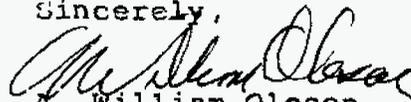
I calculate that the Proposed Final Rates will represent a minimum monthly increase of 45% in my billing. This is inordinate, inapprehensible and inappropriate. Have you ever found a price change of this magnitude in any other marketplace, even an noncompetitive, regulated one????

Further, this is especially tough medicine to swallow when you consider that I am up North for 5 months annually, not even using the sewer system I am billed for!!!

Please regulate and reign in this over-aggressive utility.

Thank you.

Sincerely,


A. William Oleson

DOCKET NO. 920199-WS
AUGUST 6, 1992

SCHEDULE NO. 4

RATE SCHEDULE
WATER

UTILITY: Southern States Utilities, Inc./Deltona Utilities, Inc.
SYSTEM: SUGAR MILL WOODS
COUNTY: CITRUS
TEST YEAR ENDED: December 31, 1991

Monthly Rates

	<u>Current</u>	<u>Utility Requested Interim</u>	<u>Staff Recommended Interim</u>	<u>Staff Alternate Interim</u>	<u>Staff Required System Rates</u>
<u>Residential and General Service</u>					
Base Facility Charge:					
Meter Size:					
5/8"x3/4"	\$2.00	\$7.64	\$3.23	\$2.63	\$4.24
3/4"	\$3.00	\$11.46	\$4.85	\$3.95	\$6.36
1"	\$5.00	\$19.10	\$8.08	\$6.58	\$10.60
1-1/2"	\$10.00	\$38.20	\$16.16	\$13.17	\$21.19
2"	\$16.00	\$61.12	\$25.86	\$21.07	\$33.91
3"	\$31.99	\$122.24	\$51.70	\$42.12	\$67.80
4"	\$49.99	\$191.00	\$80.79	\$65.82	\$105.95
6"	\$99.98	\$382.00	\$161.58	\$131.63	\$211.91
Gallorage Charge per 1,000 G.	\$0.58	\$0.75	\$0.88	\$0.76	\$1.23

Typical Residential Bills

<u>5/8" x 3/4" meter</u>					
3 M	\$3.74	\$9.89	\$5.87	\$4.92	\$7.93
5 M	\$4.90	\$11.39	\$7.64	\$6.45	\$10.39
10 M	\$7.80	\$15.14	\$12.04	\$10.27	\$16.53
15 M	10.70	18.89	16.43	14.03	22.69
<u>1" meter (Added by COVA)</u>					
3 M	\$6.74	\$21.35	\$10.72	\$8.86	\$14.29
5 M	7.90	22.85	12.48	10.38	16.75
10 M	10.80	26.60	16.88	14.18	22.90
15 M (Average residential usage at SMW)	13.70	30.35	21.28	17.98	29.05
20 M	16.60	34.10	25.68	21.78	35.20
30 M	22.40	41.60	34.48	29.38	47.50
40 M	28.20	49.10	43.28	36.98	59.80

• COVA Comments: We take exception to any interim rates which approach or exceed the SSU Requested Interim rate. They significantly overstated the percent used and useful for the water distribution lines at 50% and the water plant at 100% in the MFR's. Our calculations show the respective percentages should be 22% and 73%--all figures include margin reserve. Our data for the corrected used and useful is shown in Exhibit "A", part of COVA's letter to the PSC ON August 10, 1992. The 31.5% increase in the present rates as shown in the column for Staff Alternate Interim rates appears to be the most fair. Both the BFC and the gallorage increases for that amount will be more understandable and acceptable by the SMW residents. COVA will support the Staff Alternate Interim rate.

BLH
8/13/92

DOCKET NO. 920199-WS
AUGUST 6, 1992

SCHEDULE NO. 4

**RATE SCHEDULE
WASTEWATER**

UTILITY: Southern States Utilities, Inc./Deltona Utilities, Inc.
SYSTEM: SUGAR MILL WOODS
COUNTY: CITRUS
TEST YEAR ENDED: December 31, 1991

	<u>Monthly Rates</u>				
	<u>Current</u>	<u>Utility Requested Interim</u>	<u>Staff Recommended Interim</u>	<u>Staff Alternate Interim</u>	<u>Staff Required System Rates</u>
Residential					
Base Facility Charge:					
Meter Size:					
5/8"x3/4"	\$8.06	\$5.87	\$11.96	\$12.13	\$8.06
3/4"	\$8.06	\$8.81	\$13.91	\$12.13	\$8.06
1"	\$8.06	\$14.68	\$17.80	\$12.13	\$8.06
1-1/2"	\$8.06	\$29.35	\$27.55	\$12.13	\$8.06
2"	\$8.06	\$46.96	\$39.24	\$12.13	\$8.06
3"	\$8.06	\$93.92	\$70.42	\$12.13	\$8.06
4"	\$8.06	\$146.75	\$105.50	\$12.13	\$8.06
6"	\$8.06	\$293.50	\$202.95	\$12.13	\$8.06
Gallage Charge per 1,000 G.	\$2.21	\$0.92	\$3.26	\$3.32	\$2.21
Gallage Cap *	6M	10M	6M	6M	6M
General Service					
Base Facility Charge:					
Meter Size:					
5/8"x3/4"	\$8.06	\$5.87	\$11.96	\$12.13	\$8.06
3/4"	\$12.09	\$8.81	\$17.94	\$18.19	\$12.09
1"	\$20.13	\$14.68	\$29.87	\$30.28	\$20.13
1-1/2"	\$40.27	\$29.35	\$59.76	\$60.58	\$40.27
2"	\$64.43	\$46.96	\$95.61	\$96.93	\$64.43
3"	\$128.86	\$93.92	\$191.22	\$193.86	\$128.86
4"	\$201.34	\$146.75	\$298.78	\$302.90	\$201.34
6"	---	\$293.50	---	---	---
Gallage Charge per 1,000 G.	\$2.65	\$0.92	\$3.91	\$3.99	\$2.65

Typical Residential Bills

<u>5/8" x 3/4" meter (1991 Ave. meters - 154)</u>					
3 M	\$14.69	\$8.63	\$21.74	\$22.10	\$14.69
5 M	\$19.11	\$10.47	\$28.26	\$28.75	\$19.11
Maximum Bill *	\$21.32	\$15.07	\$31.52	\$32.07	\$21.32
<u>1" meter (1991 Ave. meters at SMW -1,572)</u>					
3 M	\$14.69	\$17.44	\$27.58	\$22.10	\$14.69
5 M	19.11	19.28	34.10	28.75	19.11
Maximum	21.32	23.88	37.36	32.07	21.32

COVA Comment: Both the Staff Recommended and the Alternate Interim rates are considerably higher than the Utility Requested rates. In fact, all the rates shown here are too high when considering the zero rate base for sewer at SMW. We propose the PSC Staff Recommended 1991 Test Year rates, Docket No. 900329-WS, as shown on page 2 of this Exhibit "C".

DOCKET NO. 900329-WS
MAY 16, 1991

~~Page 2 of 2~~

SCHEDULE 4
SUMMARY OF RATES

CITRUS COUNTY continued

	Present Rates	Interim Rates	COMPANY REQUESTED		STAFF RECOMMENDED STAND-ALONE RATES	
			County-wide	Cross-county	1989 Test Year	1991 Test Year
WASTEWATER						
SUGARMILL WOODS (Monthly Residential)						
All Meter Sizes - base facility charge	\$8.06	\$8.06	\$8.42	\$14.87	\$4.81	\$4.53
Gallage Charge per 1,000 gallons	\$2.21	\$2.21	\$2.01	\$3.89	\$1.30	\$1.20
Gallage Cap	6M	6M	8M	10M	6M	6M
Typical Residential Bills - 5/8"x3/4" Meter						
3M	14.69	14.69	14.45	26.54	8.71	8.13
5M	19.11	19.11	18.47	34.32	11.31	10.53
Maximum	21.32	21.32	24.50	53.77	12.61	11.73
General Service						
5/8" x 3/4"	\$8.06	\$8.06	\$8.42	\$14.87	\$4.81	\$4.53
3/4"	\$12.09	\$12.09	\$12.63	\$22.31	\$7.22	\$6.80
1"	\$20.13	\$20.13	\$21.05	\$37.18	\$12.03	\$11.32
1.5"	\$40.27	\$40.27	\$42.10	\$74.35	\$24.05	\$22.65
2"	\$64.43	\$64.43	\$67.36	\$118.96	\$38.48	\$36.24
3"	\$128.86	\$128.86	\$134.72	\$237.92	\$76.96	\$72.48
4"	\$201.34	\$201.34	\$210.50	\$371.75	\$120.25	\$113.25
6"	--	--	\$421.00	\$743.50	\$240.50	\$226.50
Gallage Charge per 1,000 gallons	\$2.65	\$2.65	\$2.41	\$4.67	\$1.56	\$1.44

COVA proposes that the STAFF RECOMMENDED 1991 TEST YEAR RATES be used for the SMW Interim Wastewater Rates. It corrects for the erroneous percent used and useful of 49% for the collection lines which SSU used in their MFR's in the current rate case. Our calculations show in Exhibit "A", page 4, letter to the PSC of August 10, 1992, that the correct used and useful should be 21%--both figures include margin reserve.

BLH
8/13/92

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Cypress & Oak Villages Association, Inc.

91 CYPRESS BOULEVARD WEST • SUGARMILL WOODS • HOMOSASSA, FLORIDA 32646

August 10, 1992

Florida Public Service Commission
101 E. Gaines Street
Tallahassee, Fl. 32399-0850

Docket No.920199-WS

Gentlemen:

COVA, the governing body for the homeowners of Sugarmill Woods, would like to bring to your attention the following points relating to the application of Southern States Utilities for increased rates.

1. As consumers we did not receive timely notice to prepare for this case. The MFR's were returned to the utility June 17. We received notice on July 25. The meeting for staff recommendations was scheduled for August 6 and the interim rate decision will be August 18.

2. Southern States Utilities (SSU) is incorrect in using meter size to determine ERC's. Previous Public Service Commission decisions used residential units. SSU used a figure of 4291 ERC's for water distribution whereas the correct figure is 1845. For sewer, SSU used a figure of 4168 ERC's, whereas the correct figure is 1818. Refer to COVA Exhibit "A".

3. SSU is incorrect in its determination of used and useful percentages. The 1990-1 rate decision, Docket No. 900329) is based on lower used and useful. Since that decision three new wells have been added and growth has averaged only 6%. Obviously the used and useful percentage requested by SSU is now too high. The water distribution used and useful

Cypress & Oak Villages Association, Inc.

91 CYPRESS BOULEVARD WEST • SUGARMILL WOODS • HOMOSASSA, FLORIDA 32846

calculates to be 22%. SSU uses 50%. The water plant used and useful calculates to be 73%. SSU uses 100%. The sewer collection used and useful calculates to be 21%. SSU uses 49%. All the above percentages include margin reserve. Refer to COVA Exhibit "A".

4. The sewer cap should be 6000 gallons. The prior rate case and prior history proves that any higher cap results in lot owners who do not have wells paying sewer usage charge on lawn irrigation.

5. SSU is incorrect in basing sewer charge on meter size. It should be a flat rate. In the 1990-1 rate case, Docket No. 900329, final staff recommendations were for a reduction in both base sewer rates and sewer usage charges.

6. The fire protection reserve of 2500 GPM is impractical. In the 1990-1 rate case, Docket No.900329, fire protection reserve was not considered. Since that case, 1800 GPM of new wells have been added to the total capacity. The fire protection reserve would consume all this new capacity plus over 20% of the previous capacity. This is one more reason why the used and useful is too high. All things considered, 1500 GPM seems a practical limit for fire protection. Refer to COVA Exhibits "A" and "B".

7. SSU's anticipated rate case expense is \$1,772,200, which includes \$412,253 for customer notification. On the face, this latter amount seems disproportionate. Have the costs charged to SSU staff that show in other accounts been duplicated in the above rate case expense?

8. SSU has included the entire cost of the three new wells for 1991. The wells did not go on stream until April, 1992.

Cypress & Oak Villages Association, Inc.

91 CYPRESS BOULEVARD WEST • SUGARMILL WOODS • HOMOSASSA, FLORIDA 32646

9. The increase in Base Facility Charge appears unreasonably great. This is probably because in the case of smaller utilities, when many residents leave for the summer, the flow is inadequate to provide sufficient revenue. In Sugarmill Woods, our flow remains constant throughout the year. It is not conducive to water conservation to have an unreasonably high Base Facility Charge and a low usage charge.

Thank you for your thoughtful consideration of the above items and for allowing us to bring to your attention additional points as our research continues.

Very truly yours,



Harry C. Jones, P.E.

President of COVA

WATER--ERC and USED & USEFUL CORRECTIONS**DISTRIBUTION:**

SSU has used connected ERC's based on the meter size concept which for the 1991 test year per Schedule F-9 gives a very high average of 4,291 ERC's as compared to 1707 ERC's in the 1989 test year for the 1990 rate case, Docket No. 900329-WS. That rate case used a single family residential connection as equalling one ERC--this is in accordance with the 1985 Twin County Utility rate case, Docket No. 840206-WS, PSC Orders 14380 (5/17/85) and 15440 (12/12/85). These orders defined for SMW's a water usage of 500 gallons per day for a single family residential connection as being equal to one ERC.

In both the 1990 rate case and this current case, SSU used a potential of 9054 ERC's based on the single family residential connection concept. In fact, the 9054 ERC's is an adjusted figure proposed by COVA and accepted for use by SSU and the PSC.

Changing back to the single family residential connections for the customers on the water distribution system will get the used and useful calculations on an apples-to-apples basis. The following calculations are based on data from Schedule: E-2A, page 0359, which shows that for the 1991 test year, there were 21,223 residential water bills and a water consumption of 323,695,000 gallons. That is an average of 15,252 gallons per month per connection or about 500 gallons per day--identical to the 1985 definition of an ERC for water at SMW.

Dividing the annual bills by 12 months, show an average of 1769 residential connections--1769 ERC's.

For general use customers, there were 451 bills with a usage of 13,107,000 gallons or 29,062 gallons per month per connection. This is an average daily use of 956 gallons per customer or about the equivalent of 2 ERC's for each of (451 bills/12 months) 38 connections for a total of 76 General ERC's.

Total ERC's on the system are (1769 + 76) 1,845.

$$\begin{aligned} \text{Distribution system percent used and useful} &= \frac{1,845}{9,054} \text{ ERC} \\ &= 20 \% \end{aligned}$$

Per Schedule F-9, page 0570, the average annual growth is 6.3 %.

$$\begin{aligned} \text{Margin reserve is} &= 116 \text{ ERC} \\ \text{Percent used and useful} &= \frac{1,845 + 116}{9,054} \text{ ERC} \\ &= 22 \% \text{ with margin reserve} \end{aligned}$$

That is a substantial reduction from the 47% and the 50% erroneously submitted by SSU in their MFR's. Rate base, depreciation and other factors should reflect the change.

WATER PLANT:

SSU in the MFR's stated that they were going to determine the water treatment plant as though 2,500 GPM would be required for fire protection as per Citrus County Ordinance No. 86-10, and that one of the largest wells would be out of service. However, Schedule F-3, page 0566, shows that they took two out of service in calculating the used and useful.

The reserve for fire protection has been a controversial issue at SMW starting with the Twin County Utility 1981 rate case, but the situation does seem to be improving with the installation of 3-10" wells that went on the line in mid-1992. The homes in SMW are predominately of cinder block and stucco construction with 15' or more spacing between homes except in some multi-family zoned areas, the villas may be close to each other on one side.

A large percentage of the homes are on side streets that end in a cul-de-sac. The side streets are serviced by 6" water mains with a 6" water hydrant at the head of the cul-de-sac. The 6" service may run as far as 1,200' from main to hydrant. It appears that the piping and hydrant friction losses will limit the fire flow to about 1,500 GPM. This falls within the Insurance Services Office Needed Fire Flow requirement for 1-and 2-family dwellings not exceeding 2 stories in

height. With a distance of 11-30' between buildings, the needed fire flow is 1,000 GPM, and at 10' or less is 1,500 GPM. (EXHIBIT "B")

Secondly, the 2,500 GPM SSU has used in their used and useful calculations, will take 4-10" inch wells to supply. At a system cost of about \$300,000 per well for a total of \$1.2 million, it fails to be cost effective for the price range of homes in SMW. Down the road when large ground level tanks and high pressure service pumps are installed, the 2,500 GPM fire flow may make sense.

Lastly, during the 1991 drouth and the SWIFTMUD enforcement of water rationing, SMW residents cooperated with a COVA plan to conserve water and to only irrigate in off-peak periods to enable the water plant to meet the domestic demand until the new 3-10" wells came on line. A check of water usage for the 1989 test year as compared to the current 1991 test year shows a decrease in water usage from 20,098 gallons per month to 15,252 per residential connection--a 24% reduction.

With 1,500 GPM for fire protection and one 600 GPM well down, the water plant used and useful calculates to be:

Maximum day demand, gallons per minute pumped	1,298
Fire protection reserve, gallons per minute	<u>1,500</u>
Total demand, gallons per minute	<u>2,798</u>
4,800 GPM capacity less 600 GPM (1-10" well)	4,200
Percent used and useful	67 %
Margin reserve, gallons per minute (1.5 yrs & 6.3% annual growth, but no growth in fire protection) $1,298 \times 1.5 \times 0.063 =$	123
Total demand including margin reserve, GPM	2,921
Percent used and useful	70%
If fire protection included, margin reserve, GPM	264
Total demand, gallons per minute	3,062
Percent used and useful	73 %

MFR Schedule F-5, page 0567, shows 100% used and useful. Use of our figures will buy SSU a little more time for planning and engineering and level out our rates for awhile.

SEWER--COLLECTION:

The MFR's show that SSU used ERC's based on meter size rather than the 255 gallons per day for a single family connection as specified and intended in the Twin County Utility rate case, Docket No. 840206-WS. However, as in water distribution, the potential 9054 ERC's, based on the single family residential connection was used--so, we are not apples-to-apples again.

Schedule: E-2A, page 0165, shows 20,602 billings for wastewater for the 1991 test year, which on a monthly basis calculates to be an average of 1717 sewer residential connections, or 1717 ERC's.

For general service, the schedule shows a consumption of 9,440,000 gallons for the test year. With 325 bills for the year, there is an average flow of 29,046 gallons per month per customer or 955 gallons per day. An ERC for sewer was established at 255 gallons per day in the 1985 rate case, so there are (955/255) 3.75 ERC's per connection. The number of connections are (325 annual bills/12months) an average of 27 which at 3.75 ERC's each, the total for general service is 101 ERC's.

ERC's, residential	1,717
ERC's, general service	<u>101</u>
Total ERC's	<u>1,818</u>
Potential system ERC's	9,054
Percent used and useful	20 %
Margin reserve (1 yr at 6% growth)	109
Total ERC's including margin reserve	1,927
Percent used and useful	21 %

In MFR Schedule F-8, page 0202, SSU showed usage of 1.5 years for margin reserve for collection lines, and on Schedule F-6, page 0200, they showed used and useful percentages at 46% and 49% . Correction of their error in overstating the connected ERC's has made a very significant reduction in the collection system used and useful.

SEWER--DISPOSAL PLANT:

COVA has no problem with the used and useful calculations for the disposal plant, but we do have a question regarding the flow meter at the Parshall flume.

At the PSC formal hearing on Docket No. 900329-WS, it was brought out that the maximum flow to the sewage plant in the peak month of February 1989 averaged 290,000 gallons per day. This was less than for some of the prior years before they took over in December, 1988.

COVA contended that the reduction was primarily due to the good work done by the local maintenance people in stopping ground water infiltration into the system. However, Mr. Charles Sweat, SSU, was firm in his belief that the meter was reading low and would probably be replaced. Was that done, and if so, when? Over two years later, in March 1991, an average peak flow of 270,742 gallons per day was reported for the 1991 test year--a decrease of over 19,000 gallons per day is not significant unless you take into account the 6% average annual growth.

8/10/92

BLH

340. CALCULATION OF NEEDED FIRE FLOW (NFF_i):

$$NFF_i = (C_i)(O_i)(X + P)_i$$

When a wood shingle roof covering on the building being considered, or on exposed buildings, can contribute to spreading fires add 500 gpm to the Needed Fire Flow

The Needed Fire Flow shall not exceed 12,000 gpm nor be less than 500 gpm.

The Needed Fire Flow shall be rounded off to the nearest 250 gpm if less than 2500 gpm and to the nearest 500 gpm if greater than 2500 gpm.

Note 1: For 1- and 2-family dwellings not exceeding 2 stories in height, the following Needed Fire Flows shall be used.

Distance between buildings	Needed Fire Flow
Over 100'	500 gpm
31-100'	750
11-30'	1000 *
10' or less	1500

Note 2: Other habitational buildings, up to 3500 gpm maximum.