



# Public Service Commission

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RECORDS AND REPORTING

**DATE:** MAY 6, 1999

**TO:** DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYÓ)

**FROM:** DIVISION OF WATER AND WASTEWATER (FLETCHER, MUNROE) *SBS*  
DIVISION OF LEGAL SERVICES (JAEGER) *2/10/99* *AWM*

**RE:** DOCKET NO. 981243-WU - APPLICATION BY MARION UTILITIES, INC. FOR APPROVAL OF REVISED SERVICE AVAILABILITY CHARGES FOR SPRUCE CREEK SERVICE AREA AND NEW SERVICE AVAILABILITY POLICY FOR ITS WATER DIVISION IN MARION COUNTY.  
COUNTY: MARION

**AGENDA:** MAY 18, 1999 - REGULAR AGENDA - PROPOSED AGENCY ACTION - INTERESTED PERSONS MAY PARTICIPATE

**CRITICAL DATES:** 8-MONTH EFFECTIVE DATE: MAY 30, 1999

**SPECIAL INSTRUCTIONS:** NONE

**FILE NAME AND LOCATION:** S:\PSC\WAW\WP\981243.RCM

### CASE BACKGROUND

Marion Utilities, Inc. (Marion or utility) is a Class A utility providing water and wastewater service for approximately 4,382 water and 118 wastewater equivalent residential connections (ERCs) in Marion County. According to its 1997 Annual Report, for the twelve months ending December 31, 1997, the utility recorded operating revenues of \$963,249 and \$21,311 for water and wastewater, respectively. The utility's service areas are located in the St. Johns River Water Management District Water Conservation Area as designated by the Governing Board of the Water Management District.

The utility's service territory consists of four separate service areas, specifically Turning Pointe, Windgate Estates and Bordering Oaks Estates, Woods and Meadows, and Spruce Creek. Each of these service areas have separately authorized service

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availability charges. The Spruce Creek service area is comprised of seven (7) subdivisions, specifically Oak Crest, Emerald Point, Ohlerking, Cherrywood Estates, Sandy Pines, Ocala Waterway Estates, and Kingslands County Estates (Whispering Pines and Forest Glen).

On September 30, 1998, Marion filed an application for approval of revised service availability charges for its Spruce Creek service area. The utility's present service availability charges for its Spruce Creek service area were established in Order No. 25563, issued January 21, 1992. Spruce Creek's present service availability system capacity charge is \$445 per equivalent residential connection (ERC). Its present back flow preventor installation fee is actual cost for over 2" meter connections. Its current customer meter installation fees are \$100, \$130, and \$180 for 5/8" X 3/4", 1", and 1 1/2" meter connections, respectively, and are set at actual cost for 2" and over 2" meter connections.

The utility requested the following changes in its service availability charges for Spruce Creek. First, the utility requested to extinguish Spruce Creek's system capacity charge of \$445 per ERC. Second, the utility has proposed a prospective plant capacity charge and main installation charge of \$150 and \$500, respectively, for residential per ERC and a plant capacity charge and main installation charge of \$.4286 and \$1.4286, respectively, for all others per gallon. With regard to meter installation fees, the utility has requested a \$210 fee for each 5/8" X 3/4" meter connection, a \$247 fee for each 1" meter connection, a \$427 fee for each 1 1/2" meter connection, and actual cost for each meter connection over 1 1/2".

In its application, Marion also requested approval of a new service availability policy for its entire water division. A service availability policy is a section of a utility's tariff which sets forth a uniform method of determining service availability charges to be paid and conditions to be met by applicants for service in order to obtain water or wastewater service. On March 22, 1999, Marion filed revised tariffs for Tariff Sheets Nos. 31.0 and 32.0 which are part of the utility's proposed service availability policy for its water division. The utility modified the language contained in Sections 7.0 and 8.0 entitled off-site facilities and on-site facilities, respectively. At present, the utility does not have a tariffed service availability policy for its water division.

**DISCUSSION OF ISSUES**

**ISSUE 1:** Should the utility's tariff filing to modify its service availability charges for its Spruce Creek service area be approved as filed?

**RECOMMENDATION:** No. The Tariff Sheet No. 21.4 filed on September 30, 1998 should be denied. The Commission should approve the service availability charges shown on Schedule No. 1 and issue the order as Proposed Agency Action (PAA). If there is no timely protest to the Commission's PAA by a substantially affected person, the utility should file an appropriate revised tariff sheet within thirty days of the effective date of the Order, and staff should be given administrative authority to approve the revised tariff sheet upon staff's verification that the tariffs are consistent with the Commission's decision. If a revised tariff sheet is filed and approved, the service availability charges should become effective for connections made on or after the stamped approval date of the revised tariff sheet pursuant to Rule 25-30.475(2), Florida Administrative Code. (FLETCHER, MUNROE)

**STAFF ANALYSIS:** On September 30, 1998, Marion filed an application for approval of revised service availability charges for its Spruce Creek service area and for approval of tariffs which specify its service availability policy for its entire water division. By Order No. PSC-98-1562-PCO-WU, issued November 23, 1998, the Commission suspended Marion's proposed changes in service availability charges for its Spruce Creek service area and the utility's proposed tariffs which specify its service availability policy for its water division. The utility's proposed charges for its Spruce Creek service area are also reflected on Schedule No. 1.

**SPRUCE CREEK PLANT CAPACITY AND MAIN INSTALLATION CHARGES**

Marion stated the reason for its application was to recover part of the utility's investment in facilities to accommodate the fire flow requirement for new developments in its Spruce Creek service area. During the years 1997 and 1998, the utility completed the following additions: 1) a 12" well, 2) two 10,000 gallon hydropneumatic storage tanks, 3) the distribution system for Ocala Waterway Estates - Phase I, and 4) the distribution system for Kingslands County Estates - Whispering Pines and Forest Glen - Phase I. Also, the utility expects the distribution systems for Ocala Waterway Estates - Phase II & III and Kingslands County Estates - Whispering Pines and Forest Glen - Phase II to be completed in 1999.

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For the Spruce Creek service area, the utility proposed a plant capacity charge and a main installation charge of \$150 and \$500, respectively, as well as the extinguishment of its current system capacity charge of \$445. A system capacity charge is designed to defray a portion of the cost of the plant, as well as a portion of the cost of lines. A plant capacity charge represents the reimbursement by a developer or a customer to offset the cost of the plant. A main installation charge represents the reimbursement by a developer or a customer to offset the cost of the lines.

When calculating service availability charges, staff believes that it is more reasonable to have separate charges for the cost of plant and the cost of lines, instead of one system capacity charge. One reason for this delineation is to avoid a possible over-contribution by a customer. For instance, when a utility accepts donated lines from a developer and only has an authorized system capacity charge, this could create a situation in which the utility would not only accept the donated lines but also collect system capacity charges from customers for those lines that had been donated. Thus, the utility's contribution in aid of construction (CIAC) associated with the donated lines would essentially be accounted for twice, which would reduce the utility's rate base on an accelerated basis. To avoid this, staff believes it is prudent to discontinue system capacity charges when utilities request revised service availability charges. Therefore, staff recommends that Marion be allowed to extinguish its current system capacity charge and be allowed to implement a plant capacity charge and a main installation charge for its Spruce Creek service area.

In its application, the utility indicated that due to the comprehensive land plan and the land use plan, the fire flow requirement for its Spruce Creek service area is now 500 gallons per minute for a period of four hours. This equates to a fire flow requirement of 120,000 gallons per day (gpd). However, according to Marion County's Fire-Rescue Fire Prevention Division, the fire flow requirement for the Spruce Creek service area is 1,500 gallons per minute for a period of two hours. This requirement equates to a system demand of 180,000 gpd.

Pursuant to Rule 25-30.515(b), Florida Administrative Code, an ERC means the number of gallons a utility demonstrates is the average daily flow for a single residential unit. The utility derived its 554 gpd per ERC for the Spruce Creek service area by dividing the 388,000 gpd average maximum day flow from July 1997 to June 1998 by its 700 average ERCs for the same period. With regard to the system demand from future ERCs to be connected to the Spruce Creek plant, staff believes it is appropriate to use this

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historical flow data from July 1997 to June 1998 for the purpose of calculating Spruce Creek's service availability charges. Thus, based on the 554 gpd per ERC, staff calculated its recommended service availability charges for the Spruce Creek service area.

In its application, the utility indicated that 550 future ERCs will be connected to its Spruce Creek system within two years. However, pursuant to Order No. PSC-98-0452-FOF-WU, issued March 31, 1998, titled In Re: Application for amendment of Certificate No. 347-W to add territory in Marion County by Marion Utilities, Inc., the Commission found the following:

There will be initially 400 residential homes built in this area with another 150 planned to be constructed. Ultimately the utility believes that 1,500 homes will be built in the area. With the expansion of the Spruce Creek water treatment plant the utility has adequate capacity to serve this area in the future.

Based on its responses to staff data requests, the utility anticipates that 148 ERCs from five older subdivisions and 825 ERCs from the new developments will connect to its Spruce Creek system within the next ten years. Also, the utility does not anticipate any changes or modifications to the Spruce Creek plant within the next ten years to accommodate these additional 973 ERCs. At present, the Spruce Creek plant has a rated capacity of 1,180,000 gpd. Based on our review of the average peak day and maximum peak day flows, staff has determined that the Spruce Creek plant has the capacity to serve these additional 973 ERCs. If the staff recommended service availability charges are approved, it must be noted that 50 of the 973 ERCs will be connected prior to the effective date of the revised tariffs. Thus, staff's recommended service availability charges are based on 923 future ERCs to be connected to the Spruce Creek plant.

Pursuant to Rule 25-30.580(1)(a), Florida Administrative Code, the maximum amount of CIAC, net of amortization, should not exceed 75% of the total original cost, net of accumulated depreciation, of the utility's facilities and plant and plant when the facilities and plant are at their design capacity. The purpose of this cut-off point is to ensure that the utility retains a 25% investment in its facilities so that it will maintain an interest in the facilities. Pursuant to Rule 25-30.580(1)(b), Florida Administrative Code, the minimum amount of CIAC should not be less than the percentage of such facilities and plant that is represented by the water transmission and distribution and sewage collection systems.

The utility's requested plant capacity charge of \$150 and main installation charge of \$500 for its Spruce Creek service area are inappropriate because these charges are projected to place the Spruce Creek system in excess of the 75% maximum CIAC level prescribed by Rule 25-30.580(1)(a), Florida Administrative Code. Staff's calculations of the appropriate service availability charges for the Spruce Creek service area are shown on Schedule No. 2. If the staff recommended service availability charges are approved, the new charges will not cause the utility's contribution level to exceed the maximum 75% limit prescribed by Rule 25-30.580(1)(a), Florida Administrative Code. Based on staff's analysis of our recommended charges, the utility will meet the minimum CIAC threshold requirement prescribed by Rule 25-30.580(1)(b), Florida Administrative Code. Therefore, staff recommends a plant capacity charge of \$95 and a main installation charge of \$510. Based on discussions with the utility, the utility agrees with staff's recommended charges.

SPRUCE CREEK METER INSTALLATION AND BACKFLOW PREVENTOR FEES

In its application, the utility requested revised meter installation fees for its Spruce Creek service area which included the installation of a backflow preventor as a cost component of the requested revised meter installation fees. The utility's proposed meter installation fees and the backflow preventor cost component of these proposed fees for each meter size installation is reflected below:

<u>Meter Size</u>	<u>Meter Installation Fee</u>	<u>Backflow Preventor Cost Component</u>
5/8" X 3/4"	\$210	\$118
1"	\$247	\$125
1 1/2"	\$427	\$155
Over 1 1/2"	Actual Cost	Actual Cost

By Order No. PSC-93-1719-FOF-WU, issued November 30, 1993, titled In Re: Petition for a Limited Proceeding to Adjust Water Rates in Pasco County by Betmar Utilities, Inc., the Commission found the following:

The DEP rules do not require that a backflow prevention device be used for detection purposes on every customer connection. Rules 17-555.360(2) and (3), Florida Administrative Code, state that "community water systems shall establish a routine cross-connection control program to detect and prevent cross-connections that create or may create an imminent and substantial danger

to public health...." The Rule further states the "upon discovery of a prohibited cross-connection, public water systems shall either eliminate the cross-connection by installation of an appropriate backflow prevention device...or shall discontinue service until the contaminant source is eliminated."

We believe that if the customer creates a cross-connection that presents an imminent and substantial danger to public health, then that customer should bear the responsibility for its elimination.

Order No. PSC-93-1719-FOF-WU at 7 and 9. Thus, staff recommends that the backflow preventor devices should be removed as a cost component of the utility's proposed meter installation fees because the Commission has previously determined that the DEP rules do not require a backflow prevention device to be used for detection purposes on every customer connection. Further, based on the Commission's finding in the Betmar case, staff recommends the utility be allowed to install these backflow preventor devices when a cross-connection hazard is discovered that creates an imminent and substantial danger to public health or when a customer requests installation of a backflow preventor device.

The utility indicated that a company named U.S. Filter would be the primary vendor for the backflow preventors and that a double-check backflow preventor with ball valves would be the type of backflow preventor used. Staff requested and received a quote from U.S. Filter for double-check backflow preventors with ball valves for 5/8" X 3/4", 1", and 1 1/2" meter connections, which is reflected in the table below. Using the labor and transportation costs provided in the utility's application, staff's recommended backflow preventor fees are reflected in the table below:

<u>Meter Size</u>	<u>Quote From US Filter</u>	<u>Backflow Preventor Fees</u>
5/8" X 3/4"	\$ 61.92	\$113
1"	\$ 69.12	\$120
1 1/2"	\$151.20	\$217

With regard to the backflow preventor fees for meter connections over 1 1/2", the utility requested that these fees be set at actual cost. Based on a comparative analysis of other utilities under the Commission's jurisdiction with authorized fees for backflow preventor devices, staff believes that its recommended fees for 5/8" X 3/4", 1", and 1 1/2" meter connections and the utility's proposed fees for meter connections over 1 1/2" at actual cost are reasonable.

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Based on discussions with the utility, the utility does not dispute staff's recommendation regarding implementation of a separate fee for the backflow preventors. Further, the utility requested that it be allowed to continue charging its existing meter installation fees for the Spruce Creek service area. Spruce Creek's existing meter installation fees are the same scale of fees authorized for the utility's Turning Pointe and Woods and Meadows service areas. Staff believes that Spruce Creek's existing meter installation fees are reasonable and we recommend that the Commission continue to authorize the utility to charge these fees.

In summary, staff's recommended meter installation fees and backflow preventor fees for the utility's Spruce Creek service area are reflected by meter size in the table below:

<u>Meter Size</u>	<u>Meter Installation Fees</u>	<u>Backflow Preventor Fees</u>
5/8" X 3/4"	\$100	\$113
1"	\$130	\$120
1 1/2"	\$180	\$217
Over 1 1/2"	Actual Cost	Actual Cost

#### SUMMARY

Staff recommends that the utility's application for approval of revised service availability charges for its Spruce Creek service area should be denied. Staff recommends that the appropriate service availability charges are shown on Schedule No. 1. If there is no timely protest to the Commission's PAA by a substantially affected person, the utility should file an appropriate revised tariff sheet within thirty days of the effective date of the Order, and staff should be given administrative authority to approve the revised tariff sheet upon staff's verification that the tariffs are consistent with the Commission's decision. If a revised tariff sheet is filed and approved, the service availability charges should become effective for connections made on or after the stamped approval date of the revised tariff sheet pursuant to Rule 25-30.475(2), Florida Administrative Code, if no protest is filed.



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**ISSUE 2:** Should the utility's proposed service availability policy for its water division be approved?

**RECOMMENDATION:** No. The utility's proposed tariff sheets which specify its service availability policy for its water division, filed on September 30, 1998 and March 22, 1999, should be denied. Staff has recommended changes to the utility's proposed service availability policy which we believe are appropriate. The Commission should approve the changes set forth in the staff analysis below and issue the order as Proposed Agency Action (PAA). If there is no timely protest to the Commission's PAA by a substantially affected person, the utility should file appropriate revised tariff sheets within thirty days of the effective date of the Order, and staff should be given administrative authority to approve the revised tariff sheets upon staff's verification that the tariffs are consistent with the Commission's decision. If revised tariff sheets is filed and approved, the service availability policy for the utility's water division should become effective for connections made on or after the stamped approval date of the revised tariff sheet pursuant to Rule 25-30.475(2), Florida Administrative Code. (FLETCHER, MUNROE)

**STAFF ANALYSIS:** Marion requested approval of its proposed tariff sheets which specify its service availability policy for its entire water division. At present, the utility does not have an approved service availability policy. A service availability policy is a section of a utility's tariff which sets forth a uniform method of determining service availability charges to be paid and conditions to be met by applicants for service in order to obtain water or wastewater service. At present, the utility also does not have a tariffed service availability policy for its wastewater division because the utility only provides wastewater service to one subdivision which is built-out. Thus, there is no apparent need to establish one at this time for its wastewater division.

Based on a discussion with the utility, the utility agreed that its provisions for off-site facilities and on-site facilities on proposed Tariff Sheets Nos. 31.0 and 32.0, respectively, were inconsistent with its developer agreements. As stated in the case background, Marion filed revised tariffs on March 22, 1999 for Tariff Sheet Nos. 31.0 and 32.0. The utility modified the language contained in Sections 7.0 and 8.0 entitled off-site facilities and on-site facilities, respectively, which resolved the inconsistency with the developer agreements.

Staff has throughly reviewed the utility's proposed service availability policy for its water division. During our review,

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staff discovered areas of concern with the utility's proposed service availability policy. Staff believes certain changes, discussed below, are appropriate. These changes affect all of the utility's proposed tariff sheets specifying its service availability policy for its water division.

First, the utility's proposed service availability policy has two Tariff Sheets Nos. 29.0 and two Tariff Sheets Nos. 40.0. This is simply a typographical error. Staff recommends that the Tariff Sheet No. 29.0, which contains part of the index to the proposed policy, should be labeled Tariff Sheet No. 28.1. Further, Tariff Sheet No. 40, which contains a table of daily flows, should be corrected after all of staff's recommended changes are made because the changes could affect what the appropriate tariff sheet number should be.

Second, the utility has proposed provisions for the Calculation of Plant Capacity Charges, Treatment Plant Capacity Allocations, Calculation of System Capacity Charges, and System Capacity Allocations which state that each single family residence in the Spruce Creek service area shall be equal to 1.58 ERCs. The utility derived its 554 gpd per ERC for the Spruce Creek service area by dividing the 388,000 gpd average maximum day flow from July 1997 to June 1998 by its 700 average ERCs for the same period. Then it divided the 554 gpd per ERC by the industry standard of 350 gpd to equate a 1.58 ERCs for each single family residence in the Spruce Creek service area. According to Exhibit VI of its application, these single family residences in the Spruce Creek service area have a 5/8" x 3/4" meter size. Pursuant to industry standards, a 5/8" x 3/4" meter equals one (1) ERC. Staff believes that it is inappropriate for the utility to redefine an ERC. Accordingly, staff believes that the reference of 1.58 ERCs in the provisions stated above should be removed.

Third, in Issue 1, staff has recommended approval of new plant capacity and main installation charges, as well as the cancellation of the existing system capacity charge for the Spruce Creek service area. If Issue 1 is approved, no reference should be made to the Calculation of System Capacity Charges and System Capacity Allocations provisions for the Spruce Creek service area because its charge would be discontinued.

Fourth, the utility's proposed provision for a Customer Service Line Installation Charge states the following:

When it is necessary to install a customer service line from an existing main to the point of delivery, a customer service line installation charge will be paid by

the individual customer. The amount of the charge will be the actual cost as determined by whether or not a road crossing is required. This charge will be imposed only when facilities previously installed have no service line to the Contributor's property.

This provision is a request for a new charge. Based on our analysis, staff believes this charge at actual cost is reasonable. This will allow the utility to collect from the customer causing the expense, instead of from the general body of ratepayers. Since this charge is applicable to the utility's entire water division, staff believes the charge should also be reflected in the tariff schedules of fees and charges for the utility's Turning Pointe (21.1), Windgate Estates and Bordering Oaks Estates (21.2), Woods and Meadows (21.3), and Spruce Creek (21.4) service areas.

Lastly, if staff's recommended backflow preventor fees for its Spruce Creek service area are approved (Issue 1), the utility's service availability policy for its water division should include a provision for the installation of such devices. Specifically, the backflow preventor provision should include the following:

The installation of a backflow preventor device shall be required when a cross-connection hazard is discovered that creates an imminent and substantial danger to public health. Also, the installation of a backflow preventor device is permitted upon customer request. The fees required for backflow preventor devices are as shown on Sheets 21.1 through 21.4.

In addition, Sheets 21.1 through 21.4 should contain a reference to this provision.

Based on staff's changes above, staff believes that the utility's service availability policy for its water division will contain sufficient detail to inform prospective customers of activities and charges for which they will be responsible. Thus, staff recommends that the utility's proposed tariff sheets which specify its service availability policy for its water division, filed on September 30, 1998 and March 22, 1999, should be denied. If there is no timely protest to the Commission's PAA by a substantially affected person, the utility should file an appropriate revised tariff sheet within thirty days of the effective date of the Order, and staff should be given administrative authority to approve the revised tariff sheet upon staff's verification that the tariffs are consistent with the Commission's decision. If a revised tariff sheet is filed and approved, the service availability charges should become effective

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for connections made on or after the stamped approval date of the revised tariff sheet pursuant to Rule 25-30.475(2), Florida Administrative Code.

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**ISSUE 3:** Should this docket be closed?

**RECOMMENDATION:** No. The docket should remain open for thirty days from the effective date of the Order to allow the utility time to file revised tariff sheets, if no timely protest is filed by a substantially affected person. (JAEGER, FLETCHER)

**STAFF ANALYSIS:** If no timely protest is filed by a substantially affected person, the docket should remain open for thirty days from the effective date of the Order to allow the utility time to file revised tariff sheets. Further, in the event of such protest, staff will prepare an additional recommendation to address additional issues in this docket.

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**Marion Utilities, Inc. - Spruce Creek  
Docket No. 981243-WU  
Service Availability Charges - Water Only**

**Schedule No. 1**

	<u>Present</u>	<u>Company Proposed</u>	<u>Staff Recommended</u>
<b><u>System Capacity Charge:</u></b>	\$ 445.00	No Charge	No Charge
<b><u>Plant Capacity Charge:</u></b>			
Residential-per ERC (554 gpd)	None	\$ 150.00	\$ 95.00
All other-per gallon	None	\$ 0.4286	\$ 0.1715
<b><u>Main Installation Charge:</u></b>			
Residential-per ERC (554 gpd)	None	\$ 500.00	\$ 510.00
All other-per gallon	None	\$ 1.4286	\$ .9206
<b><u>Plan Review Charge:</u></b>	Actual Cost	No Change	No Change
<b><u>Inspection Charge:</u></b>	Actual Cost	No Change	No Change
<b><u>Meter Installation Fees:</u></b>			
5/8" X 3/4"	\$ 100.00	No Change	No Change
1"	\$ 130.00	No Change	No Change
1 1/2"	\$ 180.00	No Change	No Change
2"	Actual Cost	No Change	No Change
Over 2"	Actual Cost	No Change	No Change
<b><u>Back Flow Preventor Installation Fee:</u></b>			
5/8" X 3/4"	None	\$ 169.00	\$ 113.00
1"	None	\$ 176.00	\$ 120.00
1 1/2"	None	\$ 221.00	\$ 217.00
2"	None	Actual Cost	Actual Cost
Over 2"	Actual Cost	No Change	No Change
<b><u>Customer Service Line Installation Charge:</u></b>			
All meter sizes	None	Actual Cost	Actual Cost

**Marion Utilities, Inc. - Spruce Creek Plant**  
**Docket No. 981243 WU**  
**Water Operation**

**SCHEDULE NO. 2**

<b>Staff Recommended:</b>												
<b>Plant Capacity Charge:</b>	<b>\$95</b>	<b>Backflow Preventor fee:</b>						<b>\$113</b>				
<b>Main Installation Charge:</b>	<b>\$510</b>											
<b>Meter Installation Fee</b>	<b>\$100</b>											
	<u>1997</u>	<u>1998</u>	<u>1999</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>
<b>Capacity</b>	420,000	1,180,000	1,180,000	1,180,000	1,180,000	1,180,000	1,180,000	1,180,000	1,180,000	1,180,000	1,180,000	1,180,000
<b>Demand</b>	107,700	568,000	772,426	855,526	884,888	914,250	943,612	972,974	1,002,336	1,031,698	1,061,060	1,089,868
<b>% Used</b>	25.64%	48.14%	65.46%	72.50%	74.99%	77.48%	79.97%	82.46%	84.94%	87.43%	89.92%	92.36%
<b>Growth</b>			350	150	53	53	53	53	53	53	53	52
<b>Utility Plant</b>	771,251	1,254,247	1,269,247	1,274,547	1,279,847	1,285,147	1,290,447	1,295,747	1,301,047	1,306,347	1,311,547	
<b>Accumulated Depreciation</b>	(98,692)	(130,593)	(170,338)	(210,403)	(250,635)	(291,033)	(331,599)	(372,331)	(413,231)	(454,297)	(454,379)	
<b>Net Plant</b>	<u>672,559</u>	<u>1,123,654</u>	<u>1,098,909</u>	<u>1,064,144</u>	<u>1,029,212</u>	<u>994,114</u>	<u>958,848</u>	<u>923,415</u>	<u>887,816</u>	<u>852,050</u>	<u>857,168</u>	
<b>CIAC</b>	196,335	455,545	561,295	598,660	636,025	673,390	710,755	748,120	785,485	822,850	886,540	
<b>Accumulated Amortization</b>	(59,700)	(74,230)	(90,246)	(108,515)	(127,961)	(148,584)	(170,385)	(193,362)	(217,516)	(242,848)	(243,851)	
<b>Net CIAC</b>	<u>136,635</u>	<u>381,315</u>	<u>471,049</u>	<u>490,145</u>	<u>508,064</u>	<u>524,806</u>	<u>540,370</u>	<u>554,758</u>	<u>567,969</u>	<u>580,002</u>	<u>642,689</u>	
<b>Net Investment</b>	<u>535,925</u>	<u>742,339</u>	<u>627,859</u>	<u>573,999</u>	<u>521,148</u>	<u>469,308</u>	<u>418,478</u>	<u>368,658</u>	<u>319,847</u>	<u>272,047</u>	<u>214,478</u>	
<b>CIAC Ratio</b>	<u>20.32%</u>	<u>33.94%</u>	<u>42.87%</u>	<u>46.06%</u>	<u>49.36%</u>	<u>52.79%</u>	<u>56.36%</u>	<u>60.08%</u>	<u>63.97%</u>	<u>68.07%</u>	<u>74.98%</u>	