

**Ruth Nettles**

090349-WS

**From:** Trina Collins [TCollins@RSBattorneys.com]  
**Sent:** Tuesday, January 19, 2010 11:29 AM  
**To:** Filings@psc.state.fl.us  
**Cc:** smlubertozzi@uiwater.com; keweeks@uiwater.com; jdwilliams@uiwater.com; pcflynn@uiwater.com; Curt Mouring; Stan Rieger; Jennifer Brubaker; Martin Friedman; Christian W. Marcelli; Trina Collins  
**Subject:** Filing in Docket No. 090349-WS; Cypress Lakes Utilities, Inc.'s Application for a Limited Proceeding Water and Wastewater Rate Increase in Polk County, Florida  
**Importance:** High  
**Attachments:** PSC Clerk 16 (Response to Used and Useful).ltr.pdf

- a. Martin S. Friedman, Esq.  
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- b. Docket No. 090349-WS; Cypress Lake Utilities, Inc.'s Application for a Limited Proceeding Water and Wastewater Rate Increase in Polk County, Florida - Filing the Utility's response to Staff's request for additional information regarding the position of Cypress Lakes Utilities, Inc. that its wastewater treatment plant is 100% used and useful in the public service.
- c. Cypress Lakes Utilities, Inc.
- d. 25 Pages.
- e. Letter to Commission Clerk and response attachments - 25 pages.

DOCUMENT NUMBER-DATE

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January 19, 2010

E-FILING

Ann Cole, Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

Re: Docket No. 090349-WS; Cypress Lake Utilities, Inc.'s Application for a Limited Proceeding Water and Wastewater Rate Increase in Polk County, Florida  
Our File No. 30057.182

Dear Ms. Cole:

This letter is in response to Staff's request for additional information regarding the position of Cypress Lakes Utilities, Inc. (the "Utility") that its wastewater treatment plant ("WWTP") is 100% used and useful in the public service. In addition to the explanation below, the Utility is attaching data and schedules in support of its position.

The WWTP should be considered 100% used and useful because the projected 5-year customer growth analysis indicates the system will reach buildout within five (5) years of the test year, as contemplated in Section 367.081(2)(a)2, Florida Statutes, and Rule 25-30.432, Florida Administrative Code. Since the Utility's last rate case,<sup>1</sup> the Utility has increased the capacity of its WWTP by 15,000 gpd (or 8.57%). Since then, the buildout lot count has increased by 120 lots (or 8.06%). Schedule 3, attached hereto, indicates that the annual rate of growth is 65 residential ERCs.

As demonstrated on Schedule 3 and Schedule 4, attached hereto, at the historic rate of growth and taking into account the recent housing slowdown, the service area would be built out in less than four (4) years. Conservation, especially due to economic conditions, may affect this, but the plant was designed and in place prior to that occurrence. Since the last rate case, the number of accounts has grown each year and

<sup>1</sup> By Order No. PSC-07-0199-PAA-WS, issued March 5, 2007 in Docket No. 060257-WS, the Commission found the water treatment plant to be 100% used and useful and the WWTP to 95.71% used and useful.

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Ann Cole, Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
January 19, 2010  
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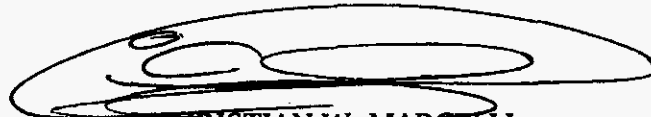
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the number of year-round residents has increased. There are now 141 new water accounts and 138 new wastewater accounts, yet the maximum 3-month average daily flow has been reduced each year since the last rate case and is now virtually the same as it was in the 2005 test year. This reduction in water and wastewater flows is the result of the customers' conservation efforts.

In addition, portions of the modifications that resulted in an increase in plant capacity would have been required regardless of the need to increase capacity. Per Rule 25-30.432, Florida Administrative Code, the Commission may consider such factors as the allowance for growth, the extent to which the area served by the plant is built out and flow decreases due to conservation. All of these factors lead to the conclusion that the plant, as modified, remains at 100% used and useful.

Should you or the Staff have any questions regarding this filing, please do not hesitate to give me a call.

Very truly yours,



CHRISTIAN W. MARCELLI  
For the Firm

CWM/tlc  
Enclosures

cc: Steven M. Lubertozi, Executive Director of Regulatory Accounting and Affairs (w/enclosures) (via e-mail)  
Kirsten E. Weeks, Manager of Regulatory Accounting (w/enclosures) (via e-mail)  
John Williams, Director of Governmental Affairs (w/enclosures) (via e-mail)  
Patrick C. Flynn, Regional Director (w/enclosures) (via e-mail)  
Curt Mouring, Division of Economic Regulation (w/enclosures) (via e-mail)  
Stan Rieger, Division of Economic Regulation (w/enclosures) (via e-mail)  
Jennifer Brubaker, Esquire, Office of General Counsel (w/enclosures) (via e-mail)

M:\1 ALTAMONTE\UTILITIES INC\CYPRESS LAKES\(.182) 2009 RATE CASE\PSC Clerk 16 (Response to Used and Useful).ltr.docx

### Cypress Lakes - 2006 Flows

2006 Limit	FLOW			
	Total	An Avg mgd 0.175	Mo Avg mgd	Peak mgd
January	4.244	0.122	0.137	0.165
February	4.063	0.122	0.145	0.181
March	4.455	0.121	0.144	0.156
April	4.075	0.122	0.136	0.164
May	3.38	0.122	0.109	0.139
June	3.104	0.121	0.103	0.141
July	3.335	0.121	0.108	0.146
August	3.101	0.121	0.100	0.116
September	3.201	0.121	0.107	0.146
October	3.411	0.120	0.110	0.132
November	4.022	0.121	0.134	0.149
December	4.065	0.122	0.131	0.165
<b>Total</b>	<b>44.456</b>			
<b>Average</b>		0.121	0.122	0.150
<b>Minimum</b>		0.120	0.100	0.116
<b>Maximum</b>		0.122	0.145	0.181

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### Cypress Lakes - 2006 Daily Flows

#### FLW-01

Day	1	2	3	4	5	6	7	8	9	10	11	12
January	0.134	0.133	0.142	0.137	0.120	0.156	0.145	0.153	0.128	0.126	0.125	0.130
February	0.136	0.122	0.144	0.181	0.165	0.138	0.136	0.152	0.131	0.140	0.135	0.158
March	0.130	0.113	0.146	0.136	0.148	0.148	0.152	0.148	0.142	0.148	0.153	0.156
April	0.144	0.152	0.132	0.146	0.135	0.122	0.141	0.131	0.152	0.155	0.146	0.134
May	0.128	0.139	0.108	0.105	0.120	0.094	0.121	0.118	0.120	0.120	0.114	0.111
June	0.104	0.101	0.126	0.098	0.097	0.089	0.092	0.086	0.099	0.091	0.099	0.073
July	0.074	0.079	0.091	0.142	0.106	0.099	0.115	0.115	0.113	0.108	0.106	0.115
August	0.101	0.098	0.099	0.077	0.082	0.099	0.096	0.074	0.095	0.109	0.104	0.116
September	0.103	0.110	0.110	0.113	0.123	0.111	0.115	0.112	0.110	0.104	0.112	0.113
October	0.117	0.110	0.104	0.101	0.107	0.111	0.113	0.115	0.113	0.116	0.105	0.112
November	0.124	0.124	0.121	0.122	0.121	0.124	0.140	0.149	0.138	0.135	0.127	0.129
December	0.133	0.135	0.142	0.137	0.137	0.129	0.120	0.129	0.122	0.116	0.019	0.150

Cypress Lakes - 2006 Daily Flows

13	14	15	16	17	18	19	20	21	22	23	24	25
0.138	0.127	0.148	0.124	0.137	0.126	0.142	0.130	0.133	0.148	0.054	0.135	0.135
0.146	0.130	0.128	0.129	0.143	0.111	0.135	0.164	0.143	0.164	0.140	0.166	0.173
0.153	0.154	0.139	0.140	0.134	0.149	0.145	0.149	0.148	0.153	0.142	0.140	0.145
0.065	0.135	0.121	0.144	0.155	0.157	0.145	0.127	0.140	0.152	0.164	0.156	0.128
0.116	0.109	0.110	0.111	0.115	0.100	0.095	0.104	0.104	0.095	0.108	0.109	0.096
0.141	0.111	0.094	0.103	0.101	0.100	0.111	0.096	0.109	0.130	0.114	0.098	0.108
0.146	0.114	0.108	0.109	0.112	0.103	0.105	0.097	0.098	0.121	0.119	0.136	0.107
0.106	0.115	0.115	0.105	0.099	0.103	0.098	0.113	0.101	0.087	0.100	0.101	0.080
0.091	0.105	0.107	0.087	0.103	0.101	0.108	0.146	0.117	0.102	0.095	0.100	0.103
0.122	0.089	0.121	0.108	0.105	0.119	0.113	0.121	0.119	0.112	0.103	0.111	0.094
0.126	0.137	0.129	0.148	0.147	0.143	0.135	0.128	0.143	0.128	0.137	0.138	0.133
0.116	0.121	0.125	0.080	0.126	0.142	0.152	0.154	0.154	0.150	0.165	0.153	0.162

Cypress Lakes - 2006 Daily Flows

26	27	28	29	30	31	TOTAL	AVG	MAX
0.157	0.157	0.140	0.165	0.164	0.155	4.244	0.137	0.165
0.163	0.158	0.132				4.063	0.145	0.181
0.141	0.147	0.142	0.136	0.134	0.144	4.455	0.144	0.156
0.104	0.083	0.111	0.138	0.160		4.075	0.136	0.164
0.096	0.083	0.106	0.103	0.111	0.111	3.380	0.109	0.139
0.117	0.097	0.093	0.120	0.106		3.104	0.103	0.141
0.094	0.096	0.104	0.099	0.098	0.106	3.335	0.108	0.146
0.093	0.105	0.106	0.105	0.104	0.115	3.101	0.100	0.116
0.110	0.115	0.103	0.106	0.066		3.201	0.107	0.146
0.103	0.114	0.119	0.059	0.123	0.132	3.411	0.110	0.132
0.140	0.141	0.137	0.137	0.141		4.022	0.134	0.149
0.106	0.147	0.149	0.150	0.150	0.094	4.065	0.131	0.165

### Cypress Lakes - 2007 Flows

2006	FLOW			
	Limit	Total	An Avg mgd 0.175	Mo Avg mgd
January	4.170	0.122	0.135	0.175
February	4.388	0.123	0.157	0.175
March	4.654	0.123	0.150	0.168
April	4.281	0.124	0.143	0.175
May	3.379	0.124	0.109	0.125
June	3.174	0.122	0.097	0.130
July	3.430	0.124	0.111	0.132
August	3.310	0.124	0.107	0.139
September	3.308	0.124	0.110	0.127
October	3.825	0.125	0.123	0.154
November	3.898	0.125	0.130	0.151
December	4.078	0.125	0.132	0.150
<b>Total</b>	<b>45.895</b>			
<b>Average</b>		0.124	0.125	0.150
<b>Minimum</b>		0.122	0.097	0.125
<b>Maximum</b>		0.125	0.157	0.175



**Cypress Lakes - 2007 Daily Flows**

**FLW-01**

Day	1	2	3	4	5	6	7	8	9	10	11	12
January	0.172	0.174	0.157	0.135	0.148	0.151	0.155	0.151	0.098	0.090	0.150	0.120
February	0.165	0.168	0.173	0.175	0.156	0.171	0.150	0.141	0.145	0.151	0.165	0.171
March	0.157	0.156	0.157	0.153	0.168	0.147	0.134	0.130	0.134	0.154	0.155	0.137
April	0.106	0.157	0.160	0.153	0.123	0.134	0.147	0.146	0.163	0.172	0.175	0.154
May	0.121	0.108	0.112	0.103	0.116	0.116	0.125	0.113	0.108	0.113	0.113	0.116
June	0.103	0.123	0.130	0.105	0.116	0.110	0.102	0.101	0.105	0.104	0.110	0.104
July	0.114	0.117	0.124	0.112	0.132	0.114	0.113	0.113	0.110	0.116	0.108	0.105
August	0.115	0.121	0.139	0.110	0.110	0.105	0.110	0.102	0.105	0.100	0.100	0.120
September	0.114	0.111	0.110	0.123	0.109	0.113	0.101	0.116	0.118	0.108	0.116	0.078
October	0.112	0.108	0.126	0.114	0.111	0.142	0.122	0.125	0.117	0.113	0.103	0.116
November	0.127	0.134	0.111	0.130	0.124	0.108	0.116	0.151	0.118	0.124	0.135	0.132
December	0.142	0.130	0.122	0.143	0.108	0.135	0.130	0.121	0.142	0.131	0.138	0.132

Cypress Lakes - 2007 Daily Flows

13	14	15	16	17	18	19	20	21	22	23	24	25
0.159	0.162	0.078	0.108	0.157	0.154	0.164	0.149	0.142	0.087	0.132	0.147	0.105
0.165	0.166	0.144	0.155	0.153	0.145	0.158	0.155	0.141	0.138	0.150	0.135	0.160
0.137	0.143	0.165	0.131	0.167	0.158	0.142	0.153	0.156	0.152	0.142	0.141	0.158
0.163	0.141	0.163	0.170	0.150	0.141	0.137	0.137	0.130	0.135	0.131	0.123	0.116
0.113	0.111	0.110	0.115	0.106	0.110	0.115	0.109	0.106	0.094	0.112	0.103	0.099
0.105	0.108	0.097	0.098	0.093	0.106	0.110	0.105	0.102	0.093	0.105	0.105	0.109
0.103	0.102	0.104	0.102	0.103	0.107	0.101	0.109	0.110	0.112	0.105	0.132	0.116
0.115	0.103	0.104	0.098	0.100	0.095	0.104	0.101	0.103	0.097	0.082	0.118	0.112
0.080	0.121	0.124	0.127	0.112	0.102	0.093	0.111	0.125	0.111	0.113	0.120	0.115
0.104	0.115	0.121	0.114	0.110	0.103	0.128	0.131	0.136	0.154	0.143	0.119	0.117
0.143	0.129	0.127	0.125	0.132	0.109	0.107	0.151	0.139	0.132	0.148	0.135	0.143
0.125	0.122	0.139	0.150	0.134	0.116	0.124	0.122	0.123	0.130	0.138	0.134	0.137

Cypress Lakes - 2007 Daily Flows

26	27	28	29	30	31	Total	Avg.	Max.
0.175	0.126	0.090	0.082	0.106	0.146	4.170	0.135	0.175
0.160	0.171	0.161				4.388	0.157	0.175
0.156	0.151	0.166	0.144	0.148	0.162	4.654	0.150	0.168
0.132	0.140	0.132	0.130	0.120		4.281	0.143	0.175
0.097	0.106	0.104	0.104	0.099	0.102	3.379	0.109	0.125
0.110	0.102	0.100	0.104	0.109		3.174	0.106	0.130
0.108	0.103	0.101	0.107	0.114	0.113	3.430	0.111	0.132
0.114	0.124	0.110	0.102	0.092	0.099	3.310	0.107	0.139
0.109	0.091	0.117	0.103	0.117		3.308	0.110	0.127
0.136	0.130	0.140	0.138	0.145	0.132	3.825	0.123	0.154
0.135	0.138	0.130	0.128	0.137		3.898	0.130	0.151
0.116	0.133	0.137	0.132	0.147	0.145	4.078	0.132	0.150

### Cypress Lakes - 2008 Flows

2008 Limit	FLOW			
	Total	An Avg mgd 0.175	Mo Avg mgd	Peak mgd
January	4.674	0.126	0.151	0.172
February	4.447	0.126	0.153	0.182
March	4.820	0.127	0.155	0.175
April	4.107	0.126	0.137	0.187
May	3.426	0.126	0.111	0.131
June	3.319	0.127	0.111	0.127
July	3.421	0.127	0.110	0.137
August	3.472	0.128	0.112	0.136
September	3.098	0.127	0.103	0.124
October	3.557	0.126	0.115	0.141
November	3.724	0.126	0.124	0.167
December	3.987	0.126	0.129	0.146
<b>Total</b>	<b>46.052</b>			
<b>Average</b>		0.127	0.126	0.152
<b>Minimum</b>		0.126	0.103	0.124
<b>Maximum</b>		0.128	0.155	0.187

## Cypress Lakes - 2008 Daily Flows

### FLW-01

Day	1	2	3	4	5	6	7	8	9	10	11	12	13	14
January	0.168	0.153	0.130	0.137	0.141	0.155	0.157	0.160	0.135	0.118	0.144	0.150	0.160	0.163
February	0.145	0.143	0.149	0.150	0.149	0.148	0.157	0.158	0.147	0.151	0.141	0.142	0.164	0.151
March	0.141	0.152	0.156	0.168	0.168	0.156	0.154	0.173	0.164	0.146	0.148	0.145	0.161	0.156
April	0.147	0.109	0.167	0.160	0.159	0.161	0.187	0.171	0.161	0.144	0.130	0.130	0.146	0.150
May	0.114	0.112	0.109	0.111	0.111	0.112	0.105	0.096	0.113	0.114	0.114	0.110	0.105	0.100
June	0.113	0.114	0.115	0.107	0.111	0.111	0.114	0.110	0.106	0.106	0.106	0.087	0.117	0.118
July	0.110	0.110	0.106	0.107	0.099	0.121	0.106	0.103	0.118	0.099	0.105	0.105	0.105	0.112
August	0.113	0.116	0.112	0.105	0.117	0.102	0.094	0.060	0.134	0.126	0.115	0.109	0.106	0.106
September	0.116	0.110	0.113	0.098	0.106	0.095	0.105	0.104	0.101	0.099	0.117	0.056	0.115	0.113
October	0.107	0.100	0.105	0.091	0.112	0.115	0.128	0.130	0.141	0.136	0.110	0.117	0.125	0.116
November	0.120	0.126	0.136	0.133	0.138	0.128	0.119	0.121	0.123	0.122	0.121	0.121	0.167	0.138
December	0.144	0.130	0.123	0.121	0.112	0.135	0.118	0.120	0.133	0.128	0.138	0.130	0.123	0.138

Cypress Lakes - 2008 Daily Flows

15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
0.159	0.135	0.135	0.168	0.165	0.171	0.149	0.152	0.156	0.151	0.159	0.148	0.172	0.153	0.149	0.140
0.138	0.144	0.162	0.160	0.174	0.137	0.148	0.167	0.157	0.182	0.163	0.160	0.169	0.155	0.136	
0.161	0.156	0.153	0.175	0.153	0.153	0.159	0.150	0.167	0.171	0.158	0.142	0.147	0.148	0.141	0.151
0.140	0.104	0.127	0.120	0.122	0.124	0.128	0.135	0.126	0.129	0.130	0.112	0.117	0.118	0.138	0.115
0.117	0.089	0.108	0.119	0.121	0.131	0.119	0.104	0.123	0.110	0.107	0.119	0.109	0.111	0.100	0.108
0.111	0.119	0.107	0.113	0.101	0.098	0.094	0.127	0.120	0.110	0.117	0.125	0.115	0.105	0.109	0.113
0.106	0.113	0.123	0.119	0.124	0.105	0.098	0.096	0.082	0.120	0.121	0.117	0.111	0.115	0.137	0.115
0.116	0.125	0.119	0.116	0.110	0.116	0.109	0.113	0.136	0.130	0.117	0.114	0.100	0.103	0.102	0.104
0.124	0.104	0.099	0.095	0.087	0.105	0.105	0.108	0.114	0.105	0.063	0.114	0.108	0.101	0.107	0.111
0.111	0.109	0.104	0.109	0.112	0.114	0.114	0.110	0.114	0.124	0.129	0.119	0.117	0.119	0.105	0.107
0.166	0.128	0.128	0.102	0.091	0.083	0.113	0.103	0.091	0.124	0.129	0.134	0.125	0.134	0.124	0.136
0.145	0.119	0.124	0.122	0.129	0.129	0.127	0.115	0.116	0.129	0.126	0.137	0.137	0.125	0.138	0.130

Cypress Lakes - 2008 Daily Flows

31	TOTAL	AVG	MAX
0.141	4.674	0.151	0.172
	4.447	0.153	0.182
0.146	4.820	0.155	0.175
	4.107	0.137	0.187
0.105	3.426	0.111	0.131
	3.319	0.111	0.127
0.113	3.421	0.110	0.137
0.127	3.472	0.112	0.136
	3.098	0.103	0.124
0.107	3.557	0.115	0.141
	3.724	0.124	0.167
0.146	3.987	0.129	0.146

### Cypress Lakes - 2009 Flows

2009	FLOW			
	Limit	Total	An Avg mgd 0.175	Mo Avg mgd
January	4.321	0.124	0.139	0.164
February	3.973	0.122	0.142	0.169
March	4.498	0.121	0.145	0.179
April	3.933	0.122	0.131	0.155
May	3.573	0.124	0.115	0.142
June	3.187	0.124	0.106	0.135
July	3.734	0.124	0.120	0.145
August	3.981	0.125	0.128	0.157
September	3.603	0.126	0.120	0.142
October	3.915	0.127	0.126	0.145
November	3.921	0.128	0.131	0.157
December				
<b>Y-T-D</b>	<b>42.639</b>			
<b>Average</b>		0.124	0.125	0.150
<b>Minimum</b>		0.122	0.097	0.125
<b>Maximum</b>		0.125	0.157	0.175







Cypress Lakes - 2009 Flows

31	Total	Avg.	Max.
0.149	4.321	0.139	0.164
	3.973	0.142	0.169
0.157	4.498	0.145	0.179
	3.933	0.131	0.155
0.103	3.573	0.115	0.142
	3.187	0.106	0.135
0.125	3.734	0.120	0.145
0.127	3.981	0.128	0.157
	3.603	0.120	0.142
0.142	3.915	0.126	0.145
	3.921	0.131	0.157

**Year End Customer Accounts**

2005		2006		2007		2008		2009	
Water	Sewer	Water	Sewer	Water	Sewer	Water	Sewer	Water	Sewer
1,330	1,292	1,419	1,380	1,449	1,408	1,467	1,426	1,471	1,430

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Wastewater Used & Useful Calculation

Schedule 1

Cypress Lakes Utilities, Inc.  
 Docket No. 090349-WS  
 Test Year Ended: December 31, 2008

Line No.			
		Primary calculation - Where property needed for post test year period based on growth in ERCs, per PSC rule.	
1	(A)	Used and useful flow (000):	
2		3MADF - year 2008	<u>154,896</u>
3	(B)	Property needed for post test year period (see Sch 2)	<u>34,085</u>
4	(C)	Permitted capacity after modification	<u>190,000</u>
5	(D)	Used and useful percentage	<u>99.46%</u>
		see Note	
		Use:	<u>100.00%</u>
6	(E)	Non-used and useful percentage	<u>0.54%</u>
		Use:	<u>0.00%</u>

Note:

Per PSC Rule 25-30.432, the Commission may consider such factors as the allowance for growth, the extent to which the area served by the plant is built out and flow decreases due to conservation. As indicated on Schedule 4, at the historic rate of growth, the service area would be built out in less than the allowed statutory five year period. Conservation, especially due to economic conditions, may affect this, but the plant was designed and in place prior to that occurrence. In addition, portions of the modifications that resulted in an increase in plant capacity, would have been required regardless of the need to increase capacity. All of these factors lead to the conclusion that the plant, as modified, remains at 100% used and useful.

Cypress Lakes Utilities, Inc.  
Docket No. 090349-WS  
Test Year Ended: December 31, 2008

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Wastewater Treatment & Related Facilities

$$PN = EG \times PT \times U$$

where:

1	EG =	Equivalent annual growth in ERCs (see F-10)	65 ERCs/yr
2	PT =	Post test year period per statute	5 yrs
3	U =	Unit of measure utilized in U&U calculations	106 gpd/CUST **
4	PN =	Property needed expressed in U units	34,085 gpd

Source:

Sch 3, line 13

Sch 1, line 2/Sch 3, col. 7, line 5

Line 1 x line 2 x line 3

\*\* Based on 2008 3MADF divided by 2008 ERCs from Schedule 3.

Projected Growth in Customers and Flows

Schedule 3

Cypress Lakes Utilities, Inc.  
 Docket No. 090349-VS  
 Test Year Ended: December 31, 2008

Source of data: Item 5 of the 10/5/09 reponse to Staff's second data request.

Line No.	(1)	(2) SFR Customers		(4)	(5)	(6)	(7)	(8)	(9)
	Year	Beginning	Ending	Average	SFR Capped Gallons Sold	Gallons/SFR (5)/(4)	Total Capped Gallons Sold	Total ERCs (7)/(6)	Annual % Incr. in ERCs
1	2004	1,175	1,194	1,185	44,364,000	37,454	46,553,000	1,243	
2	2005	1,194	1,284	1,239	49,312,000	39,800	51,080,000	1,283	3.26%
3	2006	1,284	1,381	1,333	51,404,000	38,577	52,995,000	1,374	7.04%
4	2007	1,381	1,421	1,401	49,977,000	35,672	51,564,000	1,445	5.22%
5	2008	1,421	1,426	1,424	48,161,000	33,833	49,648,000	1,467	1.52%
Average Growth Through 5-Year Period (Col. 8)									4.59%

Regression Analysis per Rule 25-30.431(2)(C)

		X	Y
6	Constant:	1179.28647	1 1,243 Actual
7	X Coefficient:	61.1078016	2 1,283 Actual
8	R^2:	0.96803282	3 1,374 Actual
9			4 1,445 Actual
10			5 1,467 Actual
11		TY + 5 years	10 1,790 Projected
12	Projected 5 year growth	323 ERCs	
13	Annual average growth	65	

Note: The developer projects 1608 residences at buildout. In the TY, per the above, there were 43 general service ERCs. If the general service ERCs remain unchanged, then there will be 1608+43 = 1651 ERCs at buildout. Therefore, buildout will be reached in less than five years at the historic growth rate reflected in the linear regression projection.

Calculation of 3MADF

Schedule 4

Cypress Lakes Utilities, Inc.  
 Docket No. 090349-WS  
 Test Year Ended: December 31, 2008

	MONTHLY FLOWS GALS(000)	ANNUAL FLOWS GALS(000)	3 MOS FLOWS GALS(000)	DAYS	TMADF GPD	TMADF ANNUAL MAX
January, 2005	4.075					
February	4.087					
March	4.664		12.826	90	142.511	
April	3.762		12.513	89	140.596	
May	3.348		11.774	92	127.978	
June	3.548		10.658	91	117.121	
July	3.493		10.389	92	112.924	
August	3.069		10.110	91	111.099	
September	3.082		9.644	91	105.978	
October	3.626		9.777	92	106.272	
November	3.776		10.484	91	115.209	
December	3.753	44.283	11.155	92	121.250	142.511
January, 2006	4.244		11.773	92	127.967	
February	4.063		12.060	91	132.527	
March	4.455		12.762	91	140.242	
April	4.075		12.593	90	139.922	
May	3.380		11.910	92	129.457	
June	3.104		10.559	91	116.033	
July	3.335		9.819	92	106.728	
August	3.101		9.540	91	104.835	
September	3.201		9.637	91	105.901	
October	3.411		9.713	92	105.576	
November	4.022		10.634	91	116.857	
December	4.065	44.456	11.498	92	124.978	140.242
January, 2007	4.170		12.257	92	133.228	
February	4.388		12.623	90	140.256	
March	4.654		13.212	90	146.800	
April	4.281		13.323	89	149.697	
May	3.379		12.314	92	133.848	
June	3.174		10.834	91	119.055	
July	3.430		9.983	92	108.511	
August	3.310		9.914	91	108.945	
September	3.308		10.048	91	110.418	
October	3.825		10.443	92	113.511	
November	3.898		11.031	91	121.220	
December	4.078	45.895	11.801	92	128.272	149.697
January, 2008	4.674		12.650	92	137.500	
February	4.447		13.199	90	146.653	
March	4.820		13.941	90	154.896	
April	4.107		13.374	89	150.265	
May	3.426		12.353	92	134.270	
June	3.319		10.852	91	119.253	
July	3.421		10.166	92	110.500	
August	3.472		10.212	91	112.220	
September	3.098		9.991	91	109.791	
October	3.557		10.127	92	110.076	
November	3.724		10.379	91	114.055	
December	3.987	46.0516	11.268	92	122.478	154.896
January, 2009	4.321		12.032	92	130.783	
February	3.973		12.281	90	136.456	
March	4.498		12.792	90	142.133	
April	3.933		12.404	89	139.371	
May	3.573		12.004	92	130.478	
June	3.187		10.693	91	117.505	
July	3.734		10.494	92	114.065	
August	3.981		10.902	91	119.802	
September	3.603		11.318	91	124.374	
October	3.915		11.499	92	124.989	
November	3.921		11.439	91	125.703	
December	4.152	46.791	11.988	92	130.304	142.133



	A	B	C	D	E	F	G	H	I	J
1										
2			Res	Res Mgals		GS 5/8"	GS 1"	GS 1.5"		
3	1	2004	1175	4020		16	65	83		
4	2			3848		9	57	75		
5	3			3968		33	60	76		
6	4			4692		38	65	119		
7	5			4277		10	46	99		
8	6			4406		30	61	114		
9	7			3637		27	92	82		
10	8			2888		14	68	76		
11	9			2477		5	54	69		
12	10			2382		4	71	128		
13	11			3348		23	65	115		
14	12		1194	4421	44364	32	61	147	2189	46553
15	1	2005		4267		21	38	149		
16	2			4409		24	52	88		
17	3			5043		24	35	25		
18	4			5297		28	45	184		
19	5			4922		26	41	83		
20	6			4015		23	57	66		
21	7			3163		19	37	70		
22	8			2642		10	39	62		
23	9			3926		26	58	59		
24	10			3533		19	51	58		
25	11			3532		20	46	59		
26	12		1284	4563	49312	24	34	68	1768	51080
27	1	2006		3602		20	35	145		
28	2			4197		21	32	97		
29	3			4416		20	19	106		
30	4			5562		22	38	100		
31	5			5608		19	39	90		
32	6			4982		16	38	64		
33	7			4004		13	41	55		
34	8			3190		6	47	49		
35	9			3182		11	55	41		
36	10			3225		8	52	32		
37	11			4624		19	47	61		
38	12		1381	4812	51404	51	38	44	1591	52995
39	1	2007		4415		41	45	55		
40	2			4860		45	43	59		
41	3			4465		29	37	66		
42	4			5412		64	44	82		
43	5			4919		54	44	66		
44	6			4843		48	41	58		
45	7			3404		28	46	41		
46	8			3202		30	41	47		
47	9			3256		23	42	43		
48	10			3016		10	43	37		
49	11			3824		37	40	55		
50	12		1421	4361	49977	26	33	44	1587	51564
51	1	2008		4581		24	34	53		
52	2			4433		20	30	60		
53	3			4428		24	36	71		
54	4			4528		32	48	64		
55	5			4499		21	63	67		

	A	B	C	D	E	F	G	H	I	J
56	6			4465		17	0	63		
57	7			3909		15	164	52		
58	8			2771		15	54	47		
59	9			2916		8	44	53		
60	10			3637		13	45	49		
61	11			3796		12	37	46		
62	12		1426	4198	48161	18	37	51	1487	49648