

Jumper Creek Utility Company

April 24, 2015

Office of Commission Clerk
Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Re: Docket No. 140147-WS - Application of Jumper Creek Utility Company for Staff Assisted Rate Case in Sumter County- Response to OPC's Letter of Concerns

Dear Commission Clerk,

Jumper Creek Utility Company (Jumper Creek) hereby submits its response to the Office of Public Counsel's (OPC) letter of and concerns dated April 22, 2015.

Chemicals

On September 29, 2014, Jumper Creek filed its response to Staff's Engineering Data Request dated September 18, 2014. See Document No. **05483-14**. Attached to that response document, as requested Jumper Creek submitted copies of its invoices for Chemical Expense for the test year. Below is a summary of these submitted expenses.

Water:

<u>Invoice</u>	<u>Date</u>	<u>Amount</u>
280175	5/22/2013	\$ 32.50
284880	7/17/2013	\$ 19.50
26125	11/22/2013	\$ 18.20
302482	2/14/2014	\$ 9.10
314668	7/21/2014	\$ 19.50
Total		\$ 98.80

Wastewater

<u>Invoice</u>	<u>Date</u>	<u>Amount</u>
279722	5/20/2013	\$ 39.00
288991	9/3/2013	\$ 97.50
296126	11/22/2013	\$ 130.00
302483	2/14/2014	\$ 130.00
307058	4/14/2014	\$ 97.50
314669	7/2/2014	\$ 143.00
Total		\$ 637.00

5320 Captains Court, New Port Richey, Florida 34652
Mailing: C/O 4939 Cross Bayou Boulevard, New Port Richey, Florida 34652
Tel: 727-848-8292

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Contractual Services – Other

Jumper Creek refers the staff to its previously submitted letters concerning Contractual Services – Other in Documents No. 06670-14; 01303-15; and 01603-15. As previously stated, Jumper Creek is being subsidized by \$7,353.08 for water and \$909.34 for wastewater – not the other way around. The only costs included for the regulated utilities are for a operator and a maintenance technician. If the utility were required to hire its own employees for all the required services necessary for continued quality service to its customers, the costs would be significantly higher. These low dollar amounts were utilized in recognition of the size of this small utility and its customer base. The requirements for the operations of the water treatment plant and wastewater treatment plant are the same regardless of the number of customers. As explained in Document 01603-15, a licensed operator is required for both the water and wastewater treatment facilities. Pursuant to DEP Rule No. 62-699.310, Florida Administrative Code, for the wastewater facility, a licensed operator is required for 1/2 hour a day/ 5 days a week and one weekend visit. This is 6 days a week for the permitted capacity of Jumper Creek’s wastewater treatment plant. Likewise, for the Jumper Creek water treatment plant, Rule 62-699.310 required 5 days a week visit and one weekend visit, for a total of 6 visits a week by a licensed operator.

The Office of Public Counsel alludes to the fact that another approach should be considered when comparing the O&M expenses and contractual services. This give the appearance of when an appropriate analysis is presented which does not comport to OPC’s position, it diverts the attention to one that has previously been rejected by this Commission. Jumper Creek has provided ample unrefuted evidence which supports its position that the related party contractual services for operation,, maintenance, administration, and customer service is well below the fair market value (See Documents 06670-14; 01303-15; and 01603-15). These responses will not be repeated in this response since the information has previously been provided numerous times. This AWWA study provides third party independent verification that the U.S. Water operation and maintenance costs are well below the market rate. As stated in GTE V. Deason , 642 So 2d 545 (Fla 1994), the Florida Supreme Court, “The mere fact that a utility is doing business with an affiliate does not mean that unfair or excess profits are being generated.”

The “market” comparison is drawn on by both the AWWA study provided to both the Commission and OPC for nation-wide utility companies. This market comparison is paramount in providing finality to Jumper Creeks’ unrefuted evidence that these costs are well below market, and not above as required by the Florida Supreme Court.

Instead, OPC offers a comparison table to three other Class C utilities. It is important to note that in OPC’s table it includes information from the Annual Reports of two utilities and an order establishing initial rates. None of this information and data has not been audited nor verified by the Commission. There is no indication that OPC has a baseline understanding of the condition of each of these facilities. Likewise, there is no showing of whether the utilities in this minute peer group are in need of rate relief, whether they are operating at a loss, or whether they have a service company. Finally, the corporate structures, expenses, operating standards, and environmental compliance records of the utilities in this small group have not been considered.

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Central Sumter Utility Company, LLC provides service to 3,334 water customers and 3,177 wastewater customers. Naturally when dividing O&M expenses by this large number of customers will obviously produce lower per customer amounts arithmetically. Again, Jumper Creek provides service to just 43 water and 43 wastewater customers. Also, Central Sumter Utility Company has never had a full rate case processed by this Commission, and thus its books and records have not been audited by this Commission. Based on these facts alone, no comparison may be extracted using this utility. In Order No. PSC-14-0180-FOF-WS, issued April 18, 2014, the Commission granted an extension to serve an additional 2,041 water and wastewater customers for this utility.

Likewise, Continental Utility, Inc. also provides service to 800 individual residential customers and approximately 100 customers in a master-metered condominium building. Again, when dividing O&M expenses by this large number of customers will obviously produce lower per customer amounts arithmetically. Again, Jumper Creek provides service to just 43 water and 43 wastewater customers. Continental's operating revenues for 2014 were \$245,521 for water and \$262,892 for wastewater. According to this utility's Annual Report, Continental pays \$72,000 for "management fees" to a related party, and also has a positive Acquisition Adjustment which totals \$188,976 for 2014. This utility also has a long-term loan of \$642,809 with an interest rate of 7.45%. Any analysis would need to consider the interest expense paid by this utility. This is consistent with considering the capital structure pursuant to Order No. PSC-12-0102-FOF-WS, issued March 5, 2012. Jumper Creek has no debt and no interest expense which must be paid and has a negative Acquisition Adjustment. Based on these facts alone, no comparison may be extracted using this utility.

OPC also included Orange Blossom Utilities, Inc. and referenced Order No. PSC-08-025-PAA-WS, issued April 24, 2008. What OPC doesn't recognize is that this order is for "Initial Rates and Charges." Thus, the O&M expenses in this order were projected expenses which were not audited by the Commission due to the fact they were not actual expenses, but merely projections. This Order states, "The utility anticipates providing water and wastewater service to a total of approximately 174 residential and 36 general service customers when it reaches build out." The Order also states, "The first phase of the service area includes 11 general service customers (a hotel, an office building, two restaurants, and seven stores), all owned by affiliated developers." Jumper Creek has no general service customers and the customers are not owned by any affiliates.

Further, in its Order, the Commission stated, "OBU's proposed rates are based on its projected rate base, cost of capital, operating and maintenance expenses, and customer growth." Based on this Order, the utility's projected revenue requirements were \$108,931 and \$189,582 for water and wastewater, respectively. Included in this projected revenue requirement was a pro forma capital structure consisting of 40% equity and 60% debt. The utility proposed a cost of equity of 12.01%, with a range of plus or minus 100 basis points. Also, the utility proposed debt anticipated to be financed at 5.00%. Orange Blossom has never had a full rate case processed by this Commission and thus its books and records have not been audited by the Commission. Jumper Creek has no debt and no interest expense which must be paid and has a negative Acquisition Adjustment. Based on these facts alone, no comparison may be extracted using this utility.

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It should be noted that the Commission has previously considered this approach by OPC at analyzing affiliated transactions of related parties (which has been attempted at least twice before by OPC) and stated the following in Order No. PSC-12-0102-FOF-WS, issued March 5, 2012:

In evaluating whether and how much affiliate costs should be included in rates, we are aware of the relevant statutes and cases on rates and affiliate transactions. Section 367.081(2)(a)1., F.S., sets forth our responsibility in rate setting, and specifically states:

The commission shall, either upon request or upon its own motion, fix rates which are just, reasonable, compensatory, and not unfairly discriminatory. In every such proceeding, the commission shall consider the value and quality of the service and the cost of providing the service, which shall include, but not be limited to, debt interest; the requirements of the utility for working capital; maintenance, depreciation, tax, and operating expenses incurred in the operation of all property used and useful in the public service; and a fair return on the investment of the utility in property used and useful in the public service. . . .

As reflected in the statute cited above, we are required to set reasonable rates, but we must also set rates that are compensatory. The provisions in the statute require that we consider the cost of providing service, which includes operating expenses incurred in the operation of all property used and useful in the public service, as well as a fair return on the investment of the Utility in property used and useful in the public service. In conducting our analysis of the appropriate operating expenses to be included, we are mindful of two Florida Supreme Court cases. In the case of Keystone Water Co v. Bevis, 278 So. 2d 606 (Fla. 1973), the Court held that a utility is entitled to a fair rate of return on property used or useful in public service. In Keystone, the Court further found that rates which do not yield a fair rate of return are unjust, unreasonable, and confiscatory and their enforcement deprives a utility of due process.¹ Additionally, in GTE v. Deason, 642 So. 2d 545 (Fla. 1994), the Florida Supreme Court laid out the standard of review for affiliate transactions, stating:

The mere fact that a utility is doing business with an affiliate does not mean that unfair or excess profits are being generated, without more. Charles F. Phillips, Jr., *The Regulation of Public Utilities* 254-55 (1988). We believe the standard must be whether the transactions exceed the going market rate or are otherwise inherently unfair. . . . If the answer is “no,” then the PSC may not reject the utility’s position.

GTE v. Deason, 645 So. 2d at 547-548. We have reviewed the record evidence and applied the holdings in Keystone v. Bevis and GTE v. Deason as appropriate. (pages 99 – 100)

¹ See Keystone Water Co. v. Bevis, 278 So. 2d 606, 609 (Fla. 1973).

The Commission, in arriving at its final decision stated:

While we agree with OPC witness Dismukes that AUF's Market Based Study does not offer a realistic comparison of market based rates, we also agree with AUF witness Szyzgiel that the peer group analysis presented by witness Dismukes does not provide an adequate comparison. We note that in AUF's 2008 rate case we also disagreed with witness Dismukes' previous recommendation to use a comparison of Commission-regulated utilities to AUF in evaluating affiliate-provided services. In the Utility's 2008 rate case, we specifically found "[t]hat the comparison analysis proposed by witness Dismukes does not provide an appropriate basis to warrant an adjustment being made."² As acknowledged by witness Dismukes, there are complexities associated with determining the reasonableness of affiliate transactions. *To that point, we find that witness Dismukes' peer group comparison does not adequately compare the duties, activities, and responsibilities for the Utility's affiliate-provided services.*

(Emphasis added)

The Commission further stated:

Moreover, just because the costs to operate a utility are high, this does not necessarily mean that a utility is operating inefficiently. Other factors may influence the costs to provide service to customers. Therefore, we believe a review of this particular Utility's history is helpful in understanding the costs associated with providing service.

Jumper Creek respectfully submits that the comparison of other regulated utilities expenses, although useful and informational, should not be the sole basis of any disallowance of prudently incurred operating expenses. The Commission has previously stated, "In overturning a prior Commission decision, the Florida Supreme Court enunciated the standard which we should use in reviewing affiliate transactions stating, "(w)e believe the standard must be whether the transactions exceed the going market rate or are otherwise inherently unfair."³ Order No. PSC-12-0102-FOF-WS.

Basis for the Costs

OPC also refers to Jumper Creek's response in Document 0603-15 in reference to the "US Water Engineering Support Activities." It appears that OPC is confused by Jumper Creek's response. Upon further review of Jumper Creek's response, it may be somewhat confusing. However, as previously stated, these actual costs are for the Operator. This was mislabeled on the cost model provided. The operator is responsible for all operations of the water and wastewater treatment plants, including all required DEP testing and reporting required by Rules

² See Order No. PSC-09-0385-FOF-WS, p. 78.

³ GTE v. Deason, 642 So. 2d 545, 548 (Fla. 1994).

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62-699; 62-555; and 62-602, Florida Administrative Codes. This is not the same as the Field Services.

The Field Services are related to the Maintenance Technician which includes meter reading, turn ons, turn offs, leak repairs, meter repairs and/or replacements, maintenance, line locates, customer service including premise visits concerning billing questions or water quality issues, as required by Rules 62-699; 62-555; and 62-602, Florida Administrative Codes. These duties do not overlap.

OPC also refers to Attachment "G" and the margin included. Jumper Creek takes exception to OPC's assertion that there is double recovery. Per the USW contract, the utility is responsible for any repair or improvement above \$400. There are no differences in how Attachment G works for repairs verses improvements. However, these would be for items that are required above and beyond the normal services already being provided through the actual service contract. These would be in reference to the pro forma plant items included in Document No. 01693-15, filed on March 27, 2015.

The 18% markup was derived at by using factors of 8% overhead and 10% profit. According to RS Means®, (1) the "Average Fixed Overhead for all services across the United States is 17.9%; (2) the Overhead varied from a low of 11% to a high of 16%; (3) while the Profit across all services was at 10%. Thus the Overall Overhead and Profit across all services across the United States varied from a low of 47.4% to a high of 80.4%. (See attached schedule). This 18% markup is also consistent with the FGUA contracts which were selected through the competitive bid process across the state. The 18% markup for overhead and profit is **below** the market percentage markups nationwide.

The same Attachment is utilized for all of the regulated utilities throughout the state of Florida.

Jumper Creek is extremely cognizant to the impact needed improvements will have on customer rates. Jumper Creek constantly and consistently explores ways to minimize such impacts to its customers. In addition, as discussed in Staff's Report, Jumper Creek currently has very minimal rate base and therefore any such improvements has little to no impact on customer rates. Jumper Creek has consistently been operating at a loss and any such needed repairs and/or replacements has been solely funded through its shareholders' additional paid in capital with no expectations of a return due to the utility's minimal rate base.

As enunciated in Document No. 01603-15, if the actual costs were charged to Jumper Creek for the overall operations of the utility, the expenses would be higher. Jumper Creek's previous letters give clear convincing succinct evidence that the costs charges are below market value, are currently being subsidized, and include reductions due to ERCs which do not currently exist. This was not addressed by OPC's letter of concerns.

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Bad Debt Expense

The community of Jumper Creek is a financially imperiled neighborhood. The customers of Jumper Creek discussed the fact that there are numerous houses in foreclosure and many houses in disrepair. This OPC alludes to the misconceived perception that the high bad debt “may” have been caused by actions (or lack thereof) of the previous owner. This is not correct. OPC fails to identify the fact that **no** previous Accounts Receivables were transferred from the previous owner to Jumper Creek. The previous owner retained the accounts receivables during the sale. Thus, the new owners (Jumper Creek) began with no Accounts Receivables on its books and started anew. Also, **no** customer deposits were transferred from the previous owner to Jumper Creek. The previous owner appropriately disposed of any customer deposits it may have had on its books by applying them to the outstanding AR or refunding to customer.

OPC also alludes to the fact that the bad debt “may” be caused by Jumper Creek’s actions (or lack thereof). Jumper Creek takes exception to this. Jumper Creek procedures do require shut off of service for all accounts over 60 days over the threshold of \$50 balances. Thus the amounts recorded in the utility’s bad debt expense are inactive accounts which have been turned off. In addition, Jumper Creek has a Commission approved late payment charge of \$5.00 to encourage timely payment of bills. In addition, if a customer has a customer deposit with the utility, this amount is applied to the outstanding balance prior to submission to the collection agency. Therefore, the amount of actual bad debt is the net balance of each outstanding account.

Jumper Creek follows all Commission rules and regulations in relation to customer service. Jumper Creek charges late payments for untimely payments. Jumper Creek follows through with disconnection of services for outstanding accounts. Jumper Creek also charges additional customer deposits for customers who have previously had service disconnected for nonpayment. Finally, Jumper Creek has obtained the services of a collection agency for disconnected accounts over 60 days. To date, \$2,392 in uncollectables have been turned over to the collection agency. Also to date, no amount has been collected on this amount. Jumper Creek is proud of its customer service and works with customers who may have financial difficulties in making payments by offering payment plans.

Unfortunately, Jumper Creek’s bad debt expense is not overstated. Below is a summary of Jumper Creek’s Aged Accounts Receivables as of December 31, 2014.

<u>Current</u>	<u>30 Days</u>	<u>60 Days</u>	<u>90 Days</u>	<u>120 Days</u>	<u>Total</u>
\$ 1,878.39	\$ 826.51	\$ 326.14	\$ 212.07	\$ 2,704.08	\$ 5,947.19

Miscellaneous Expense

OPC offers comments on Jumper Creek’s DEP Operating License. Attached is Jumper Creek’s most recent annual operating permit invoice from FDEP (Invoice 035480). This is an annual amount invoiced and paid to FDEP for Jumper Creek’s water system.

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Taxes Other Than Income

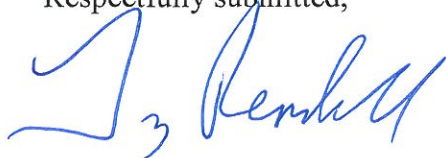
OPC also discussed Jumper Creek's property taxes. Attached is Jumper Creek's property tax bills for 2014. These paid bills total \$4,722.54 which were paid in November 2014. Therefore, the amount in the Staff Report is understated by \$373.54. Jumper Creek requests that the appropriate amount of actual property taxes be included in staff's recommendation.

Operating Ratio

Section 367.0814(9), Florida Statutes provides that the Commission may, by rule, establish standards and procedures for setting rates and charges of small utilities using criteria other than those set forth in Sections 367.081(1) , (2)(a), and (3) , F.S. Rule 25-30.456, F.A.C., provides an alternative to a staff-assisted rate case as described in Rule 25-30.455, F.A.C. As an alternative, utilities with total gross annual operating revenue of less than \$275,000 per system may petition the Commission for staff assistance using alternative rate setting. Jumper Creek did petition the Commission for alternative rate setting under the aforementioned rule. This methodology has been applied in cases in which the traditional calculation of the revenue requirement would not provide sufficient revenue to protect against potential variances in revenues and expenses. As previously stated, Jumper Creek has never had a rate case processed by this Commission. Jumper Creek's customer base is very low at just 43 water and wastewater customers. The neighborhood consists of homes in foreclosure and in disrepair. The operating requirements are established by FDEP, regardless of the number of customers being served. It is true that the customers are benefitting from the owner's purchase of the utility at a below rate base price. The customers are also benefitting from a reduction in operating expenses by the amortization of the negative acquisition adjustment. However, the majority of the costs are requirements established by FDEP in the operation of the water and wastewater utility. As previously stated, Jumper Creek is being subsidized by not being charged the actual costs required for this utility's operation by U.S. Water Services. The margin included in the contract is merely 8%, which does not cover the actual overhead and margin of U.S. Water Services. This lowered margin was in consideration of the small customer base and the fact the utility has not had a rate case previously. This is the overhead of U.S. Water Services, not Jumper Creek.

Jumper Creek believes that an operating ratio is appropriate for this small utility consistent with past Commission practice.

Respectfully submitted,



Troy Rendell
Manager of Regulated Utilities
// for Jumper Creek Utility Company



Florida Department of Environmental Protection

Bureau of Finance & Accounting

P.O.Box 3070

Tallahassee, FL 32315-3070

Drinking Water Annual Operating License Fee

INVOICE

July 1, 2014 through June 30, 2015

INVOICE NO: 035480

DATE: 7/10/2014

www.dep.state.fl.us

PWS # 6605002; email: RDEROSSETT@USWATERCORP.NET

RON DEROSSETT

U.S. WATER SERVICES

4939 CROSS BAYOU BLVD.

NEW PORT RICHEY, FL 34652

Accounting Information

Object Code : 002216

Org code: 37 35 40 60 000

Expansion Option: TA

FLAIR Code: 37202526001373504000000020000

PWS # 6605002

PWS #	SYSTEM NAME	INVOICE AMOUNT
6605002	JUMPER CREEK UTILITY COMPANY	2,000.00

Invoice amount represents only current year fee assessment.

This fee is assessed pursuant to Rule 62-4.053, Florida Administrative Code, and is **DUE August 15, 2014**. A copy of the rule may be found at <http://www.dep.state.fl.us/legal/Rules/shared/62-4/62-4.doc>.

Payments can be made by personal, business, or cashier's check, money order, electronic fund transfer or by credit card. To pay online, visit <http://www.dep.state.fl.us/> and select the link 'DEP Business Portal'. Then select 'Pay Fees'. Under the category for Water select 'Drinking Water Annual Operating License Fees'. Then follow the instructions to register or login.

If you represent a municipality (city/county government) or entity thereof, you may be eligible for a reduction or waiver of permit processing fees pursuant to Section 218.075, Florida Statutes. To obtain the most 'current' guidance for submitting a fee waiver request please register or login to the DEP Business Portal at the web link above.

If you have any questions about this fee, payment, or fee waiver eligibility please email Noreen.Biernacki@dep.state.fl.us or call (850) 245-8577.

NOTICE OF AD VALOREM TAXES AND NON-AD VALOREM ASSESSMENTS

PARCEL NUMBER	ESCROW CD	ASSESSED VALUE	EXEMPTIONS	TAXABLE VALUE	MILLAGE CODE
N24A118		SEE BELOW	SEE BELOW	SEE BELOW	1001

R 5850046

7 - 41899

ALL OF TRACTS 4 5 & 6 OF JUMPER
CREEK MANOR PG 9 PGS 5-5B

JUMPER CREEK UTILITY COMPANY
5320 CAPTAINS CT
NEW PORT RICHEY FL 34652-3089



TAXES BECOME DELINQUENT APRIL 1. NO PERSONAL OR BUSINESS CHECKS ACCEPTED AFTER APRIL 1.

PLEASE PAY IN U.S. FUNDS (NO POST DATED CHECKS) TO RANDY MASK, TAX COLLECTOR 220 E. McCOLLUM AVE • BUSHNELL, FL 33513 (352) 569-6740
TAXES CAN BE PAID ON-LINE AT WWW.SUMTERTAXCOLLECTOR.COM, BY MAIL, OR IN OFFICE. SEE BACK FOR ON-LINE PAYMENT DETAILS.

AD VALOREM TAXES						
TAXING AUTHORITY	MILLAGE RATE	ASSESSED VALUE	EXEMPTION AMOUNT	TAXABLE VALUE	TAXES LEVIED	
SUMTER COUNTY	5.9000	20,220	0	20,220	119.30	
SUMTER CO SCHOOL BOARD	6.0260	20,220	0	20,220	121.84	
SWFWMD	.3658	20,220	0	20,220	7.40	
TOTAL MILLAGE	12.2918	AD VALOREM TAXES			\$248.54	

NON-AD VALOREM ASSESSMENTS		
LEVYING AUTHORITY	RATE	AMOUNT
<p>Act 408 C 11-6-14</p> <p>COA Code: _____ Approved: _____ Paid: _____ Date: _____</p>		
NON-AD VALOREM ASSESSMENTS		\$0.00

COMBINED TAXES AND ASSESSMENTS	\$248.54	See reverse side for important information.
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If Paid By Please Pay	Nov 30, 2014	Dec 31, 2014	Jan 31, 2015	Feb 28, 2015	Mar 31, 2015
	\$238.60	\$241.08	\$243.57	\$246.05	\$248.54

RETAIN THIS PORTION FOR YOUR RECORDS

← IF PAID BY

PARCEL NUMBER	ESCROW CD	ASSESSED VALUE	EXEMPTIONS	TAXABLE VALUE	MILLAGE CODE
CPN24A118-09		SEE BELOW	SEE BELOW	SEE BELOW	1001

P 5788474

7 - 41903

JUMPER CREEK UTILITY CO
C/O GARY DEREMER
5320 CAPTAINS CT
NEW PORT RICHEY FL 34652-3089



TAXES BECOME DELINQUENT APRIL 1. NO PERSONAL OR BUSINESS CHECKS ACCEPTED AFTER APRIL 1.

PLEASE PAY IN U.S. FUNDS (NO POST DATED CHECKS) TO RANDY MASK, TAX COLLECTOR 220 E. McCOLLUM AVE • BUSHNELL, FL 33513 (352) 569-6740
TAXES CAN BE PAID ON-LINE AT WWW.SUMTERTAXCOLLECTOR.COM, BY MAIL, OR IN OFFICE. SEE BACK FOR ON-LINE PAYMENT DETAILS.

AD VALOREM TAXES						
TAXING AUTHORITY	MILLAGE RATE	ASSESSED VALUE	EXEMPTION AMOUNT	TAXABLE VALUE	TAXES LEVIED	
SUMTER COUNTY	5.9000	404,991	25,000	379,991	2,241.95	
SUMTER CO SCHOOL BOARD	6.0260	404,991	25,000	379,991	2,289.82	
SWFWMD	.3658	404,991	25,000	379,991	139.00	
TOTAL MILLAGE		12.2918	AD VALOREM TAXES		\$4,670.77	

RETAIN THIS PORTION FOR YOUR RECORDS

NON-AD VALOREM ASSESSMENTS		
LEVYING AUTHORITY	RATE	AMOUNT
Entered: _____		
COA Code: _____		
Approved: _____		
Paid: _____		
NON-AD VALOREM ASSESSMENTS		\$.00

Act 408
e
11-6-14

Date: _____		NON-AD VALOREM ASSESSMENTS	\$4,670.77	See reverse side for important information.
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COMBINED TAXES AND ASSESSMENTS					
If Paid By	Nov 30, 2014	Dec 31, 2014	Jan 31, 2015	Feb 28, 2015	Mar 31, 2015
Please Pay	\$4,483.94	\$4,530.65	\$4,577.35	\$4,624.06	\$4,670.77

← IF PAID BY