

FLORIDA UTILITY SERVICES 1, LLC
5911 TROUBLE CREEK RD.
NEW PORT RICHEY, FL. 34652
863-904-5574

October 3, 2022

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

Re: Docket # 20220026. Application for a staff-assisted rate case in Marion County by Leighton Estates Utilities, LLC.

Dear Commission Clerk:

Meter Replacement Program

I. Please explain the reason why the Utility is requesting to replace or retrofit all meters with AMI meters.

Company Response: The Beacon, Advanced Metering system (Beacon) is beneficial for the customer and the utility. On the customer side with the system App, smart phone or with any internet connection, Beacon has features that will allow customers to do such things as monitor water usage, set leak detection alarms and receive communications from the utility via text, email etc. These features will help customers identify their usage and make adjustments as they wish along with water conservation and usage monitoring. This feature will be especially helpful to our snowbird customers.

On the utility side, Beacon allows the utility to electronically obtain meter readings, which eliminates the need for a manual meter reader, gives the utility access to real time meter data for regulatory reporting purposes, reduce customer service-related calls, decreased work order management trips and eliminates the need to send personnel for meter re-reads. The system includes free software updates, free software training for utility personnel.

I have enclosed some preprinted promotional materials from Badger Meter for reference.

2. The Utility submitted one bid from Badger Meter which included the costs of an AMI meter reading software (Beacon Software), two different new meter options, and meter retrofits.

a. Please provide the additional bids the Utility received for its requested meter replacement program (software and meters). If no additional bids were sought, please explain why.

Company Response: This Beacon system pricing for the meters and software comes directly from the manufacturer so there is no one else to get bids from. I did look into other manufacturers of similar type systems and found the Badger Beacon System was the only system that would work with my current billing system along with a better warranty on the meter battery.

b. The Utility is requesting to amortize the cost of this program amongst other Florida Utility Service I, LLC (FUS I) systems. Will the Beacon Software solely be used for Leighton Estates or will the software be utilized for other FUS I systems? If so, please identify which other systems will utilize the software.

Company Response: The Beacon software and Badger meters will be used by all of the FUS I systems. I have enclosed a revised list of my companies that will be using this system. This new list removes West Lakeland Wastewater as this is a wastewater system only.

c. The Utility requested to retrofit 42 meters and install 40 new meters. Please explain how the Utility decided between retrofitting some of its meters rather than replacing them with a new meter?

Company Response: The decision to retrofit as to replace was determined by the useful remaining life of the existing meter. The general industry rule is that manual read meters should be replaced at around 1,000,000 gallons or every ten years. The previously submitted meter reading sheets reflect meter reading over, at or near the 1,000,000-gallon mark. As I understand it, the manufacturers have the option of retrofitting a meter to save cost of replacing a meter that has more useful life.

d. In its amortization schedule the Utility indicated that Leighton Estates has 77 customers. If the Utility has 77 customers, please explain why a total of 82 meters are being requested?

Company Response: In its rate case application, the utility stated that there were 77 customers at the beginning of the last year or in this case when I purchased the system. Since I purchased the system, there have been an additional 4 customers connect to the system and one new unit under construction that will require a new meter install once the construction is completed.

e. Is there a monthly fee for the use of the Beacon Software?

Company Response: There are no monthly fees for the Beacon software, initial staff training and all system updates are free as well.

Used and Useful

1. In response to staffs first data request the Utility provided a map indicating the lots within its service territory and stated that the service territory is built-out (Document No. 03603-2022). While the Utility stated in its application that it serves 80 customers, the map indicates that there are substantially more lots within the service territory that could be served.

Company Response: As best I can tell, the Commission never established a used and useful calculation in the past for this utility. None of my filings have mentioned the utility was built out, as I have requested consideration of the opposite. This utility has experienced growth in multiple ways. There has and currently are new homes or multi family homes being constructed, existing homes that previously had private wells requesting to connect to the system and a new home being built on lots with service lines already to the property.

a. Please re-submit the map previously provided to staff indicating which exact lots are currently served by the Utility. As part of your response, please indicate the total number of lots within the service territory that are occupied but are not currently receiving service from the Utility and why.

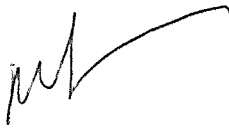
Company Response: Please see enclosed map. The service territory lays out as follows:

1. 18 serviceable lots with utility pipes at the property but current owner on a private well.
2. 16 serviceable vacant lots with utility pipes at the property.
3. 49 existing homes with no pipes at the property.
4. 27 vacant lots with no pipes at property.

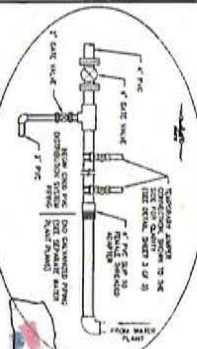
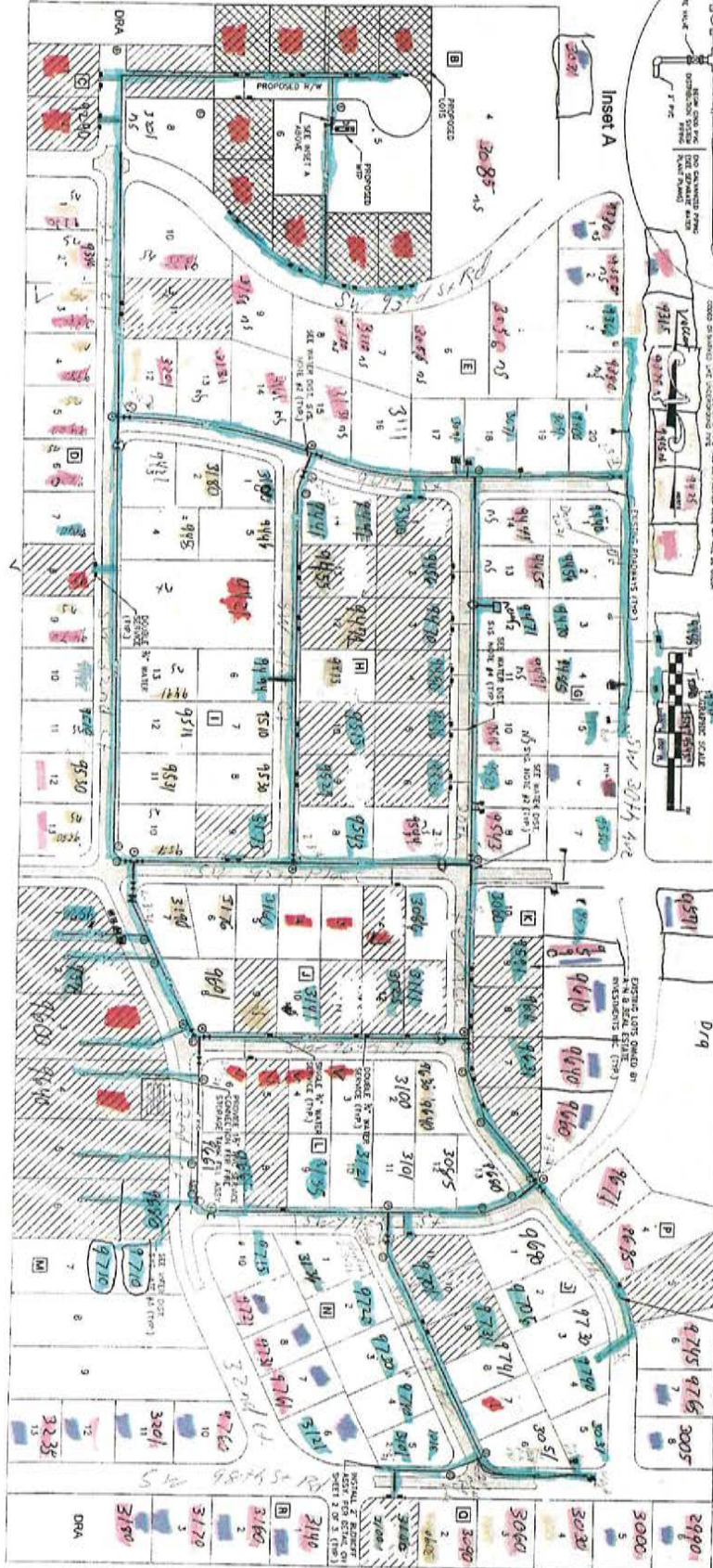
Please explain why the service area is built-out if there are additional lots within the service territory that are occupied and could be served by the Utility?

Company Response: As I understand this, the commission as never set a used and useful calculation for the prior owner of the utility. I do not know why the prior owner would have designated the utility as built out.

On behalf of the utility,



Michael Smallridge.

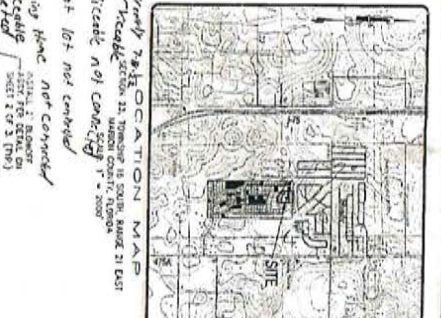


- General Notes:**
1. CONSTRUCTION OF THIS SYSTEM SHALL BE IN ACCORDANCE WITH THE CITY OF CHICAGO WATER DEPARTMENT SPECIFICATIONS.
 2. ALL MATERIALS SHALL BE APPROVED BY THE CITY OF CHICAGO WATER DEPARTMENT.
 3. ALL WORK SHALL BE DONE IN ACCORDANCE WITH THE CITY OF CHICAGO WATER DEPARTMENT SPECIFICATIONS.
 4. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS FROM THE CITY OF CHICAGO WATER DEPARTMENT.
 5. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROTECTING ALL EXISTING UTILITIES AND STRUCTURES.
 6. THE CONTRACTOR SHALL BE RESPONSIBLE FOR MAINTAINING ACCESS TO ALL ADJACENT PROPERTIES.
 7. THE CONTRACTOR SHALL BE RESPONSIBLE FOR RESTORING ALL AREAS DAMAGED DURING CONSTRUCTION.
 8. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY GUARDRAILS AND SAFETY SIGNALS.
 9. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY SIGNAGE.
 10. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY LIGHTING.
 11. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY FENCING.
 12. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY EROSION CONTROL MEASURES.
 13. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY SLOPE PROTECTION MEASURES.
 14. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY DRAINAGE MEASURES.
 15. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY CURB AND GUTTER MEASURES.
 16. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY SIDEWALK MEASURES.
 17. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY BIKEWAY MEASURES.
 18. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY STREET LIGHT MEASURES.
 19. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY STREET FURNITURE MEASURES.
 20. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL NECESSARY STREET SCENIC MEASURES.

- WATER DISTRIBUTION SYSTEM CONSTRUCTION NOTES:**
1. ALL WATER MAINS SHALL BE 4" DIA. AND SHALL BE INSTALLED AT A DEPTH OF 48" BELOW FINISHED GROUND SURFACE.
 2. ALL WATER MAINS SHALL BE INSTALLED IN ACCORDANCE WITH THE CITY OF CHICAGO WATER DEPARTMENT SPECIFICATIONS.
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- WATERMAIN LINE CLEARANCE REQUIREMENTS:**
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- Legend:**
- 1. 4" WATER MAIN
 - 2. 2" WATER SERVICE
 - 3. 1/2" WATER METER
 - 4. 1/2" WATER SERVICE
 - 5. 1/2" WATER SERVICE
 - 6. 1/2" WATER SERVICE
 - 7. 1/2" WATER SERVICE
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 - 16. 1/2" WATER SERVICE
 - 17. 1/2" WATER SERVICE
 - 18. 1/2" WATER SERVICE
 - 19. 1/2" WATER SERVICE
 - 20. 1/2" WATER SERVICE



1 of 3
 Leighton Estates Water Distribution System
 MICHAEL W. RADCLIFFE ENGINEERING, INC.
 2011 55 Lake View Avenue, Suite 101, (531)242-1500 FAX (531)242-1618
 Certificate No. 03-000480

PSC Regulated Utilities Only

Utility	# Cust	%
ALT	56	1.82%
CCU	166	5.40%
CMU	0	0.00%
CRU	614	19.97%
EMU	113	3.67%
HGU	456	14.83%
HHU	353	11.48%
LAN	0	0.00%
LEU	77	2.50%
LYU	408	13.27%
MGU	98	3.19%
OLU	72	2.34%
PCU	143	4.65%
SSU	262	8.52%
SUN	257	8.36%
SVU	0	0.00%
WLW	0	0.00%
	3,075	100%

Beacon Engagement Fee

Engagement Fee	Billing Integration Fee	Training	TOTAL	
3850.00	1733.00	2625.00	8208.00	
70.11	31.56	47.80	149.48	ALT
207.84	93.55	141.71	443.10	CCU
0.00	0.00	0.00	0.00	CMU
768.75	346.04	524.15	1638.93	CRU
141.48	63.68	96.46	301.63	EMU
570.93	256.99	389.27	1217.19	HGU
441.97	198.94	301.34	942.25	HHU
0.00	0.00	0.00	0.00	LAN
96.41	43.40	65.73	205.53	LEU
510.83	229.94	348.29	1089.06	LYU
122.70	55.23	83.66	261.59	MGU
90.15	40.58	61.46	192.19	OLU
179.04	80.59	122.07	381.71	PCU
328.03	147.66	223.66	699.35	SSU
321.77	144.84	219.39	686.00	SUN
0.00	0.00	0.00	0.00	SVU
0.00	0.00	0.00	0.00	WLW
3,850.00	1,733.00	2,625.00	8,208.00	



Badger Meter

BEACON® Advanced Metering Analytics

With ORION® Network as a Service (NaaS)

OVERVIEW

The BEACON® Advanced Metering Analytics (AMA) Solution with ORION® Network as a Service (NaaS) presents a simple, yet powerful solution to bring a new level of utility optimizing information to light.

The solution combines our intuitive BEACON AMA Software as a Service (SaaS) with a NaaS approach using proven ORION Cellular endpoints to deliver greater visibility and control over utility management.

Built-in infrastructure management services and a system design that keeps you in step with technology advancements, allows you to do what you do best—manage your water utility. Plus, built-in consumer engagement tools help enhance customer service, increase satisfaction and reduce costs.

SOFTWARE APPLICATIONS

BEACON Advanced Metering Analytics (AMA)

With tools beyond meter reading and network management, BEACON AMA software offers targeted Advanced Metering Analytics. BEACON AMA software puts interval meter data to work to increase efficiency in day-to-day utility operations and address demands for actionable intelligence.

- **Problem solver** – User intuitive data tools place the power of water consumption data at your fingertips, allowing you to rapidly respond to customer inquiries and quickly resolve—and even eliminate—many billing issues.
- **Customized design** – A customizable dashboard delivers information configured to user security access level in a format matched to the utility's individual requirements, providing data management integrity, security and control.
- **Works with you** – Integration with utility systems—billing, work order, inventory, Customer Relationship Management (CRM) and Geographic Information Systems (GIS)—streamlines and improves utility operations without disrupting the current utility billing interface file transfer process.
- **Find out fast** – Alert conditions can be set to monitor and notify users of system exceptions, including continuous flow, for faster leak detection.
- **Innovation at your service** – Secure, hosted platform with automatic software upgrades ensures the latest technology and features are always available.

EyeOnWater®

The BEACON AMA software suite includes informative consumer outreach tools to improve customer service consisting of the EyeOnWater consumer engagement website, smartphone mobile apps, and email or SMS text alerts, providing easy access to personal consumption data and alerts to potential leaks. With these tools, water consumers are able to view their usage activity, and gain greater understanding and control of what they use and the value you provide.

BEA-DS-00554-EN-10 (August 2020)



HARDWARE

ORION NaaS is powered by the proven ORION system for interval data capture and two-way communication. The solution employs cellular endpoints which, as they leverage the public cellular network and require no proprietary gateways to operate, dramatically reduce infrastructure requirements compared to a traditional fixed network. This speeds installations and simplifies expansion as a system evolves.

- **High resolution data** – ORION Cellular endpoints are programmed to automatically broadcast 15-minute meter reading and event data to the BEACON software up to four (4) times per day. The high resolution data helps identify potential customer-side leaks and other anomalies in water use, and provides the utility with a potent tool to enhance its customer service.
- **Two-way communication** – BEACON AMA software communicates with ORION Cellular endpoints to accomplish a number of system tasks, including requesting additional information from the endpoint and synchronizing the internal endpoint clock. If needed, the ORION two-way system architecture sends upgrades to the endpoint firmware over the air via the network, utilizing the powerful BEACON AMA software suite.
- **Data integrity** – Each message from the ORION Cellular endpoint is securely transported to the BEACON AMA software only via private network and never over the public internet.

SECURITY

BEACON AMA is ISO 27001 certified and SOC 2 examined for security, availability and confidentiality.

Product Data Sheet

TECHNICAL SUPPORT AND TRAINING

Configured for the utility, safe and secure BEACON AMA SaaS provides utilities with regular software updates, long-term support and maintenance. Comprehensive BEACON AMA training courses are available for online or on-site delivery at the time of system deployment. To maintain best practices, a library of online resources and options for group web-based training and support are also available. Once deployed, our technical support specialists can be contacted by phone, email and web to provide ongoing, customer-friendly support. Customized one-on-one training is available (fee applies) to further enhance user expertise.

Additionally, Badger Meter offers extended customized training to further enhance user expertise.

TECHNICAL REQUIREMENTS

BEACON AMA

Developed as a hosted software platform, BEACON AMA is a cloud-based application accessed through a standard web browser. Internet access is required. User logins provide secure access.

BEACON AMA supported web browsers include the latest and next previous major releases of Google® Chrome, Microsoft® Edge, Mozilla® Firefox®, Microsoft® Internet Explorer® (IE 11 only); and Apple® Safari®.

EyeOnWater Consumer Engagement

The EyeOnWater consumer engagement website is a cloud-based application accessed through a standard web browser. Internet access is required. Water consumer user logins provide secure access to their information.

Supported web browsers include the latest and next previous major releases of Google® Chrome, Microsoft® Edge, Mozilla® Firefox®, Microsoft® Internet Explorer® (IE 11 only); and Apple® Safari®.

EyeOnWater smartphone applications require Android 6.0 or iOS 9.1 or later, and can be downloaded from Google Play or the Apple Store.

SMART WATER IS BADGER METER

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www.badgermeter.com

Conserving Water With EyeOnWater

Tools to Get Your Customers Engaged With Water Conservation

Water conservation is top of mind for most every utility and a leading priority in many states. With BEACON® AMA SaaS already in place, accomplishing your conservation goals will be even more effective if your customers use the EyeOnWater® consumer engagement tool.

Conserving Water With BEACON AMA and EyeOnWater

Together, this analytics suite provides a wealth of powerful, yet easy-to-use water conservation tools:

- **Leak analytics** identify continuous flow conditions that represent potential leaks. When user-definable usage thresholds are crossed, the system can automatically notify you via email and text message. BEACON AMA also lets you export contact information for notifying customers by phone, email, regular mail or door hanger.
- **Reduction goal filters** provide one-click access to accounts that met or failed to meet mandated water use reduction goals.
- **Parity filters** monitor usage based on whether a premise has an odd or even numbered street address. Parity filters let you identify and notify customers who aren't in compliance with watering (irrigation) restriction rules.
- **High/Low consumption filters** count and select meters where usage falls above or below utility-defined thresholds of normal water use.
- **District Metering Area (DMA)** support lets you monitor usage across your water distribution network. The ability to compare usage between supply meters and demand meters lets you spot and quantify non-revenue water at its source.
- **EyeOnWater® consumer engagement tool**, iOS and Android smartphone apps along with a web portal, lets your customers monitor their water use and get notified of potential leaks via email and text messages.

EyeOnWater Conservation Toolkit

To assist your utility in improving customer engagement with EyeOnWater, we've created a toolkit with resources you can leverage to explain what the tool is and how consumers can benefit from it. Conservation toolkit resources include:

- **Email** you can deploy right to your customers' inboxes for reference now and later
- **Social media posts** to share on your utility's social channels
- **Customer service scripts** your representatives can use to explain EyeOnWater to customers
- **Step-by-Step instructions** to share with customers as they go through the signup process

- **Handout** your utility can pass out to customers, set out on the counter in the office, etc.
- **Doorhanger** your utility can leave behind after visiting a customer's home

These assets are available to help you connect with your customers in a way that works best for you.

[Visit Portal](#)