

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: January 24, 2023

TO: Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

FROM: Emily Knoblauch, Engineering Specialist III, Division of Engineering *EK LK*

RE: Docket No. 20210098-WU - Application for staff-assisted rate case in Pasco County by A Utility Inc.

Please place the attached letter dated January 22, 2023, from customer, Al Hashemi, on the correspondence side for Docket No. 20210098-WU.

EK/jp

Attachment



Docket Number 20210098-WU
Comments of a Customer to A Utilities Inc. Rate Increase
PART II

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Email: clerk@psc.state.fl.us

January 22, 2023
Ref: AI-FPSC-2023-422

To the Honorable Commissioners,

I, Al Hashemi, am a resident of Tropical Park. In follow up to my Part I comment referenced under this Docket as D# 11829-2022 which I would invite the Hon. Commissioners to please read Part I first (Please See Attached Exhibit I, It is Included Herein) as it is prepared based on the same publicly available data that AUI, Staff, and Auditors have provided. Reality becomes a fiction of imagination as it so vividly lacks in the purpose of this particular Docket. I would ask the Hon. Commissioners to pay attention to the following in your evaluation of the rate increase request of AUI(A Utility Inc.)

EXECUTIVE SUMMARY

The profitability of this operation is verified twice by **Auditors (AS), and A Utility INC (AUI)**. (Please See Table 2 and 3 below.) After completion of the Audit on 3/30/2022 **D# 02154-2022** which is mostly based on 1/22/2022 D# **00041-2022**. After AUI received the Audit, she responded with a letter 6/2/2022 D# **03342-2022** which mostly the same iteration of 11/16/2022 letter. Staff, in accordance to my research did not receive any additional usable data to make its conclusion as provided by art. I Table 2. As reviewed in the same article. There (CS) generated an operation and maintenance sum for the test year which basically has no 2020 data support, merely based on AUI's say so or future data after request for Rate Increase was filed. It is my conclusion that the Auditor's response is more accurate and based on data. Regarding staff unrealistic \$25180.00 for operating and maintenance expense of the test year, I would urge the Hon. Commissioners pay attention to the Audit Report by AS and art. I Table 3 including Para. 3-16 in this comment in response to specifics of CS inflated and unsupported sum.



Then why is AUI calling for increase in rates? Why is it that Staff have made such huge adjustment to Operation and Maintenance to try to provide a 40+ % increase in Water Rate? Well, here are some reasons?

- A. Non-arms-length transactions which purely for the sole purpose of creating transient profit. (Transient Profit is defined in Paragraph 1 below)
- B. To support above, she has brought in a third party to evaluate the business, whom smart enough they have clearly indicated the responsibility on AUI's data which has no adjustment as per the Hon. Commission order.
- C. In the instance of long term loan, I have explained that in my PART I comment which is included as Exhibit I. One could compare this to someone giving a loan from one hand to the other hand also in the exchange determining a fictitious high rate of interest. The (AS) has side stepped this. (Please See Article I and II below).
- D. The (AS) & (CS) have not made the point of two totally unnecessary lots. After reviewing the reports, I believe (CS) has adjusted the real operational expenses just to allow their 40%+ become reasonable. Shouldn't (CS) redo its calculations?
- E. Ownership issues which seem (AS) and (CS) have side stepped. Majority of Distribution Main is on individually owned lots without any easement, it should not be the property of AUI, the Hon. Commissioners, I hope, would clarify this by requesting properly and timely recorded ownership documents and allow all stakeholders in the park have an electronic copy of these documents that show this ownership. Park does not have such documents. Previously because this matter was not raised, the Hon. Commissioners may have not known all the facts.
- F. The valuation made by third party missing basic elements incorporated by AS & CS, the existing whole system as I have valued is over valued at \$7582.00 +/- (less adjustment for the market value of the two unrelated lot which are not included in the calculation and the land value for the lot that West Pump sits on.)
- G. The Hon. Commissioners should ask this question, why should a very small entity gets multiple corporations and land trusts of her own involved? Interestingly all have the same ownership and address. It all point to substantial increase in profitability at the expense of the



poor folks who live in this mobile home park. These folks had their minimal social security payments increased by 8.7% and the increase of 40+% by CS which I have responded in Article I and II would make me pay all of increase to AUI for no properly substantiated reasons. You are our best hope to prevent the greed making most of us more helpless.

- H. Why are there two unrelated lots that have no significance in water distribution? AUI could sell and payout the non-arm's length loan, if there is such a viable loan and if anyone can locate this loan and what was it for?
- I. With the valuation provided by the Auditors, how would any bank give a loan to this utility based on the data as determined by the Auditors? Would this not be the story of Non-Arms-Length transactions I have tried in many format to describe?
- J. One can give the benefit of the doubt that increase based on inflation is a reasonable one, as determined in Exhibit I table 1 to be \$16.63 per month starting after legal starting period.
- K. In a scenario of a possible bankruptcy, which has scared all the poor stakeholders of the park, I am ready to persuade without failure purchase by a friendly corporation with values as quoted above plus the lot it is sitting on without other unrelated lots. With one time approval of the Hon Commissioners I guarantee as long as I am managing and for as long as I am alive not to increase the water rate beyond the yearly inflation.
- L. I remind the Hon. Commissioners that the East Well and the land it sits on does not belong to AUI. This is the one that the shed is in complete lack of repair as noted by another comment. AUI must present reliable and properly recorded documents to prove otherwise.

In conclusion, the Hon. Commissioners, you have my prayers and many other silent folks in this park whom may wish to remain quiet. It is blasphemy to raise the rates by 40+% there is nothing proper to support it. The Hon. Commissioners are our hope to make the adjustments reasonable, and I would urge you to accept my proposed increase from any level to \$16.63 per month as provided in Table 1 of Exhibit I. I would swear to our Lord and all the goodness that one can soul search and find that I have not tried in any way to hamper proper and reasonable increase for AUI utility rate, after all she is supplying our water. I am highly educated in two engineering fields and business administration and all my life I have walked a straight line.



ARTICLE I

RESPONSE TO STAFF'S (CS) FIRST REPORT AND AUDITORS (AS) REPORT

(D#) 10823-2022 & (D#) 02154-2022

1. What is a Transient Profit? When non-arm length transaction is done between similarly owned entities, or a transaction is created to substitute profit for expense then it is all a wash, which is created arbitrarily by the person as an expense that creates revenue in another entity which in fact is a wash transaction as both entities have the same owners.
2. What is a Transient Equity? When non-arm length transaction is done between similarly owned entities, or a transaction is created to substitute equity for a long term loan then it is all a wash, which is created arbitrarily by the person as a loan that creates revenue in another entity, therefore, a wash transaction as both entities have the same owners.
3. Table 2 Item 2 below has the following information, please see Table 3 for breakdown below. The Operating & Maintenance Expense: CS \$25180 compared to AS \$7582.00 and AH \$7582.00.
4. **General comments**, the test year is 2020 and most of the items taken from 2021 were exercised after the request for rate increase. The Hon. Commissioners should consult their conscience, why was the 2020 a test year now that we have the full 2022, without accepting any changes to be made in 2023 and reruning the numbers.
5. All the numbers used from 2021 to increase the 2020 reported numbers is not a true responsible mean of achieving the correct rate.
6. Table 3 Item 601 Payroll - There is no tax records for payroll and in a very small company creating so many expenses with a push of a pencil is simply unwarranted, specially being a public utility, the owner can't deduct salaries and management fees when he is the only person(s) (husband and wife) benefiting from the operation sufficiently enough. Therefore, it is there for the soul purpose of rate increase and should be discarded.



TABLE 2: Comparable Numbers from AUI, AS, CS, and AH

NARUC-USOA Or Item Number	Description of NARUC	AUI Numbers	Auditors (AS) Numbers	Staff (CS)	Consumer (AH) Al Hashemi	Explanation
OPERATING INCOME						
1	Operating Revenue	\$20,722.00	\$20,858.00	\$21,608.00	\$20,858.00	No Comments
2	Operating & Maintenance Exp.	\$7,658.00	\$7,582.00	\$25,180.00	\$7,582.00	Please See Art. I Para. 3-16
3	Depreciation Expense	\$3,817.00	\$433.00	\$433.00	\$433.00	No Comments
4	Amortization Expense	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
5	Taxes Other Than Income	\$1,384.00	\$1,681.00	\$1,464.00	\$1,681.00	No Comments
6	Income Taxes	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
7	Total Operating Expenses	\$12,859.00	\$9,697.00	\$27,078.00	\$9,697.00	No Comments
8	OPERATING INCOME (LOSS)	\$7,863.00	\$11,161.00	\$5,470.00	\$11,161.00	No Comments
RATE BASE						
9	Utility Plant in Service	\$97,700.00	\$54,593.00	\$54,593.00	\$54,593.00	No Comments
10	Land	\$19,300.00	\$1,000.00	\$1,000.00	\$1,000.00	No Comments
11	Accumulated Depreciation	\$15,268.00	\$48,959.00	\$48,645.00	\$48,959.00	No Comments
12	CIAC	\$0.00	\$26,625.00	\$26,625.00	\$26,625.00	No Comments
13	Accumulated Amortization of CIAC	\$0.00	\$26,625.00	\$26,625.00	\$26,625.00	No Comments
14	Working Capital Allowance	\$0.00	\$948.00	\$3,105.00	\$948.00	No Comments
15	RATE BASE	\$101,732.00	\$7,582.00	\$10,053.00	\$7,582.00	No Comments
CAPITAL STRUCTURE						
16	Common Equity	\$38,176.00	\$0.00	\$0.00	\$6,582.00	No Comments
17	Transient Equity	\$0.00	\$0.00	\$0.00	\$117,000.00	Please See Art. I Para. 2
18	Transient Equity Denial	\$0.00	\$0.00	\$0.00	\$117,000.00	Please See Art. I Para. 2
19	Long Term Debt	\$118,000.00	\$118,000.00	\$10,053.00	\$1,000.00	Please See Art. I Para. 2
20	Short Term Debt	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
21	Accumulated Deferred Income Tax	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
22	Investment Tax Credits	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
23	Customer Deposits	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
24	TOTAL EQUITY & LIABILITY	\$156,176.00	\$118,000.00	\$10,053.00	\$7,582.00	No Comments

7. Table 3 item 615 – Purchased Power - The original amount was \$401.00 provided in first set and the missing ones extrapolated from the future years by the 3rd set of data request is \$286.58. These missing data reflects 2021 & 2022 data and they are only during the high seasons which is when the park is close to fully occupied the other 7 months only about 30% are here. Assuming consumption patterns are the same for 2021 & 2022 it comes to a total of \$687.58 not \$1173.00.



8. Table 3 item 620 – AUI indicated the average for 2017 to 2020 was \$146.00 but failed to provide the invoices therefore, for the test year the chemical consumption as it was paid and used was \$84.00.
9. Table 3 item 631- Contractual Services – Professional. \$3450.00 accurately present the expenses over 2020, the practice of jacking this up using the next year is not justified. Regardless the record shows that for 2020 all such work orders and testing, etc. was included and there is a possibility of counting the test fees twice once in para. 11 and once here.
10. Table 3 Item 632 - Contractual Services – Accounting. I recall seeing a \$300.00 bill for accounting, in the first data set, hope it has not been counted elsewhere. It is a stretch for the respectable CS to request \$3900.00 or 20%+/- of total revenues for an outside accountant when the AUI is responsibly, like any owner of a private small business, using Quick Books. If creating the reporting templates and accounts list to become in line with NARUC-USOA and the regulations and any help AUI needs doing this, I would be happy to provide free of charge. The correct maximum amount for accounting of 100 expense items and 120 revenue and 80 max misc. items set at \$400.00 is in line with proper valuation.
11. Table 3 Item 635 – Contractual Services – Testing. The record shows the total testing that was invoiced by the operator was \$288.00 including two testing for each year not \$3529.00. If staff has invoices I have not found please kindly let the Hon. Commissioners know in you final report.
12. Table 3 Item 636 - Contractual Services – Lawn Care. AUI has presented a contract that starts in 2023 for \$1440 for doing three lots of which only one has to do with water distribution the others can be taken care of with AUI's discretionary income. What is a discretionary income in this case? For the last many years a stakeholder in the park, has agreed to park his boat in one of the slots of unrelated lots and he would do the lawn care for free. Giving the scope of his future 2023 contract one could conclude the value of the boat slot used by stake holder is \$1440.00 there seems to be 6 such slots at that price there are a total of \$8640.00 in non-reported income which must be added to his yearly revenue and subsequently reduce CS's operation and maintenance assessment by the same amount. As it stands there is no lawn care fee paid by AUI. Additionally if AUI is unhappy with free lawn care, then there is a



stakeholder that can do it for \$10 each time for a total of 13 times a year at \$130.00 for the only water distribution lot.

13. Table 3 Item 650 - Transportation Expenses. AUI indicates it does not have any detailed log info, how does IRS accept this without a log book. Let's assume for a second that AUI as per his own telling once a week travels to the site (a round trip of 12 miles a week,) even making that assumption the CS's calculation is off the chart it is not 1200 miles it is 52 weeks x 12. At any rate IRS does not accept travel from your home to work. AUI has not indicated it is using home office, if he does and if it keeps the log then he can use the Mileage. As it stands there is no transport expense.
14. Table 3 Item 670 - Bad Debt Expense. How can CS create a bad debt when there is none? Therefore, no bad debt expense.
15. Table 3 Item 675 – Misc. Expense. Well AUI did not have any such expense the CS's scheduled amount is not very clear if it was counted with taxes and other items reported. I would think some of it could have been paid or charged by the operator.
16. Table 3 Item Total. Comparing the above numbers with what (AS) has determined, the AUI numbers given by (AS), I believe, is correct while there is almost a \$1000 difference between AS and the CS as far as initial AUI numbers in 2020 is concerned, that goes to the heart of the fact that CS has extended itself and there could also be a double counting as well. Regardless AH's number shows that CS has over extended the Operation and Maintenance Expenses. Knowing that all the CS staff are extremely professional, I am hoping that they will review their own interpretation of other years upon non reported items in 2020 and furthermore, making sure they have not double counted.



TABLE 2: Comparable Numbers from AUI, AS, CS, and AH

NARUC-USOA Or Item Number	Description of NARUC	AUI Numbers	Auditors (AS) Numbers	Staff (CS)	Consumer (AH) Al Hashemi	Explanation
OPERATING INCOME						
1	Operating Revenue	\$20,722.00	\$20,858.00	\$21,608.00	\$20,858.00	No Comments
2	Operating & Maintenance Exp.	\$7,658.00	\$7,582.00	\$25,180.00	\$7,582.00	Please See Art. I Para. 3
3	Depreciation Expense	\$3,817.00	\$433.00	\$433.00	\$433.00	No Comments
4	Amortization Expense	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
5	Taxes Other Than Income	\$1,384.00	\$1,681.00	\$1,464.00	\$1,681.00	No Comments
6	Income Taxes	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
7	Total Operating Expenses	\$12,859.00	\$9,697.00	\$27,078.00	\$9,697.00	Please See Note 2
8	OPERATING INCOME (LOSS)	\$7,863.00	\$11,161.00	\$5,470.00	\$11,161.00	Please See Note 3
RATE BASE						
9	Utility Plant in Service	\$97,700.00	\$54,593.00	\$54,593.00	\$54,593.00	Please See Note 4
10	Land	\$19,300.00	\$1,000.00	\$1,000.00	\$1,000.00	Please See Note 5
11	Accumulated Depreciation	\$15,268.00	\$48,959.00	\$48,645.00	\$48,959.00	Please See Note 6
12	CIAC	\$0.00	\$26,625.00	\$26,625.00	\$26,625.00	No Comments
13	Accumulated Amortization of CIAC	\$0.00	\$26,625.00	\$26,625.00	\$26,625.00	Please See Note 7
14	Working Capital Allowance	\$0.00	\$948.00	\$3,105.00	\$948.00	No Comments
15	RATE BASE	\$101,732.00	\$7,582.00	\$10,053.00	\$7,582.00	No Comments
CAPITAL STRUCTURE						
16	Common Equity	\$38,176.00	\$0.00	\$0.00	\$6,582.00	No Comments
17	Transient Equity	\$0.00	\$0.00	\$0.00	\$117,000.00	Please See Art. I Para. 2,3
18	Transient Equity Denial	\$0.00	\$0.00	\$0.00	\$117,000.00	Please See Art. I Para. 2,3
19	Long Term Debt	\$118,000.00	\$118,000.00	\$10,053.00	\$1,000.00	Please See Art. I Para. 2,3
20	Short Term Debt	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
21	Accumulated Deferred Income Tax	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
22	Investment Tax Credits	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
23	Customer Deposits	\$0.00	\$0.00	\$0.00	\$0.00	No Comments
24	TOTAL EQUITY & LIABILITY	\$156,176.00	\$118,000.00	\$10,053.00	\$7,582.00	Please See Note 8



Table 3 - Discussion of Extremely High Operating and Maitenance Cost by CS

Item No	Description	Sub - Amount	Adjust-ments	Final Amounts	AH Adjustment for CS's Numbers	AH's Final After Adj. for CS's Numbers	Explanation
1	AUI Numbers	\$7,658.00		\$7,658.00	\$0.00	\$7,658.00	
2	Auditors (AS) Numbers	\$7,582.00		\$7,582.00	\$0.00	\$7,582.00	
3	Consumer (AH) Al Hashemi's Numbers	\$7,582.00		\$7,582.00	\$0.00	\$7,582.00	
4	Staff's (CS) Numbers	\$25,180.00		\$25,180.00	\$15,404.42	\$9,775.58	
	(CS) Numbers Break Down	Actual 2020	2021 Adj	CS's Final			
601	Salaries and Wages – Employees	\$0.00	\$3,874.00	\$3,874.00	\$3,874.00	\$0.00	See Para. 6
615	Purchased Power	\$401.00	\$772.00	\$1,173.00	\$485.42	\$687.58	See Para. 7
618	Chemicals	\$84.00	\$95.00	\$179.00	\$95.00	\$84.00	See Para. 8
620	Materials and Supplies	\$3,723.00	\$76.00	\$3,647.00	\$0.00	\$3,647.00	No Comment
631	Contractual Services – Professional	\$3,745.00	\$1,876.00	\$5,621.00	\$1,876.00	\$3,745.00	See Para. 9
632	Contractual Services – Accounting	\$300.00	\$3,600.00	\$3,900.00	\$3,500.00	\$400.00	See Para. 10
635	Contractual Service – Testing	\$288.00	\$3,529.00	\$3,529.00	\$3,241.00	\$288.00	See Para. 11
636	Contractual Services – Lawn Care	\$0.00	\$1,440.00	\$1,440.00	\$1,440.00	\$0.00	See Para. 12
650	Transportation Expense	\$0.00	\$756.00	\$756.00	\$756.00	\$0.00	See Para. 13
665	Rate Case Expense	\$0.00	\$341.00	\$341.00	\$0.00	\$341.00	No Comment
670	Bad Debt Expense	\$0.00	\$432.00	\$432.00	\$432.00	\$0.00	See Para. 14
675	Misc Expense	\$0.00	\$583.00	\$583.00	\$0.00	\$583.00	See Para. 15
	TOTALS	\$8,541.00	\$17,222.00	\$25,475.00	\$15,699.42	\$9,775.58	See Para. 16

ARTICLE II

RESPONSE TO AUI LETTERS

DATED 6/2/2022 D# 03342-2022 &

DATED 11/16/2022 D# 11370-2022

17. AUI has indicated that Staff's determination will terminate its existence (I could not personally see any reasonable doubt in such termination and I believe (CS) has over extended its 40%+ rate increase. It should not be more than the inflation as given in Exhibit I, Table 1) (Please Also See Table 4 below, would you kindly review the explanations) :



TABLE 4. Declaration of AUI Amounts & Real Valuation As To Related Expenses						
AUI Letter Dated 6/2/2022 D# 03342-2022 & Dated 11/16/2022 D# 11370-2022						
AUI Declaration			Real Value Categories			
AUI Priority Order	AUI Description	AUI Declared Amount	Transient Profit Adjustment	Un-necessary Adjustment	Amount Allocation to AUI Expense	Explanation
1	A Utility inc. has not been able to pay the monthly Mortgage Payment of \$975.00 since May of 2019 the annual cost of 12 monthly payments are	\$11,700.00	(\$11,700.00)	\$0.00	\$0.00	I have gone over this in the PART I comments. The Honorable Commissioners must ask the Staff to fully investigate this matter.
2	Salaries have not been paid since January 1 2017 the annual Cost of Salaries in 2021 are	\$3,874.26	(\$3,874.26)	\$0.00	\$0.00	If the salary is paid by AUI surely it has tax documents to prove them, to whom and for what when the operating the well is being run by a third company as invoiced. Paying salary to himself must be properly documents that will show with IRS filings for the AUI.
3	Management fees have not been paid since January 1 2017 the annual Cost of Management Fees in 2021 are	\$1,257.20	(\$1,257.20)	\$0.00	\$0.00	This Simply is unexplainable. The management fee must be the net result of AUI operation. Adding their other companies of their own and creating unrelated expense does not meet the justifiability treshhold. This is nothing but Transient Profit.
4	A Utility inc. Has not been able to hire a CPA for the purpose of Complying with the Uniform System of Accounting with a quoted Annual cost of	\$3,600.00	\$0.00	(\$3,200.00)	\$400.00	Any business that spends more than 2% of its revenue on accounting must certainly fail. From the appearance of the schedules AUI is using Quick Books to do her accounting, total correct accounting fee should not be more than \$400.00 each year.
5	A Utility inc. Has not been able to hire Lawn service on a full time bases our quote is for \$120.00 monthly or Annually at	\$1,440.00	\$0.00	(\$1,310.00)	\$130.00	This is also explainted in Art. I Para. 12. Furthermore there has not been any charges as the lawn is being taken care of by a stakeholder in agreement with parking his boat on one of the unrelated lots. The \$130 reflect the 13 times of cuttings every year for each lot. since two of the lots are unrelated to water distribution, they must be paid from discretinary income. Art 1. Para. 12 well explains this, there should not be any such charges for the 2020 test year. 2017 to 2022 they are all zero.
FINAL Note: Of the Total Unrelated Expenses Given by AUI in Her Letter of 11/15/2022 in the Amount of \$21871.46 only \$530.00 is Justifiable.						

ARTICLE III

OWNERSHIP OF AUI ASSETS

18. My research indicates that the assets are not in the name of AUI. I have located relationship between multiple land trusts and corporations (among a dozen +/-corporations and land trusts all managed from the same address and post box, and all belonging to the same persons.), and a non-arm's length mortgage, all belonging to the same manager or related entities of the AUI manager.
19. The West Pump housing, the pump, and the land belong to the husband and wife through a multiple shifting land trust and the 2 different corporation but not by AUI. (The Hon.



Commissioners should carefully pay attention to why so many land trusts and corporations are needed to run such minute business?)

20. The pump housing and the East Pump are leased from the park to AUI, subject to no association fee for the 3 lots (only one lot relates to water distribution) for free water to the park's club with very little consumption (there is no pool). AUI does not own the well or the land. (I am sure the Park at the time must have had a very good reason to make such imbalanced transaction, specially the two unrelated lots have nothing to do with water distribution and must pay their association fee.)
21. There are very little easement and most of the lots have their piping without any easement. As it stands individual owners own the main distribution on their properties.
22. If there is a Florida statute that requires the properties and the well and pump and distribution system belong to the AUI, that doesn't hold here.
23. Commission in its discretion should investigate and make sure the ownership is properly in the AUI's name if that is the law.

ARTICLE IV

CONCLUSION

The Hon. Commissioners should ask themselves this question, why should a very small entity gets multiple corporations and land trusts of her own involved?

Interestingly all have the same ownership and address. It all point to substantial increase in profitability against the poor folks who live in this mobile home park.

These folks had their minimal social security payments increased by 8.7% on ground of inflation and the unwarranted increase of 40+% by Staff which I have responded in Article I and II would make me, like others, pay all of his to this utility for no properly substantiated reasons. You are our best hope to prevent the greed making most of us more helpless.

I thank you for your consideration.



Al Hashemi

37427 Ray Dr., Zephyrhills, FL 33541 T:(803)310-3337 F:(505)213-9020 hashemi.al@gmail.com

I remain yours with my prayers for a very happy 2023.

A handwritten signature in blue ink, appearing to read 'Al Hashemi', with a long, sweeping flourish extending to the right.

Al Hashemi

37427 Ray Dr.

Zephyrhills, FL 33541

Hashemi.al@gmail.com

(919) 633-6337



Docket Number 20210098-WU

Response of a Customer to A Utilities Inc. Rate Increase

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Email: clerk@psc.state.fl.us

November 30, 2022
Ref: AI-FPSC-2022-418

To the Honorable Commissioners,

I am a resident of Tropical Park, where A Utilities, Inc. (Referred hereinafter as AUI) is providing the water distribution. I have reviewed 4 Documents: the Staff Report 10823-2022; Original Request of AUI 04075-2021; Response to Staff's Information Request 00041-2022 (only the first 373 pages); and AUI response to Staff's Report 11370-2022 making additional claims and requests which are simply unrelated in my point of view to water distribution system. As a person with 48 years of experience in managing businesses. I would not consider running a business with \$20,000+/- revenue be a credible work if not run by the proprietor himself. Based on invoices and associate water system costs this is a profitable operation without any increase in the rate, now maybe additional discretionary income would be necessary for AUI. Does the owner of the AUI has other businesses? It probably seems to be the case. When such consolidated operation is reported then maybe it becomes justifiable and the requested items by AUI could be shared among the consolidated business.

Now referring to the Staff's Report 10823-2022, staff is trying to accommodate some of AUI's requests which I believe is excessive. As I have reviewed the documents provided by AUI, I am, in all honesty, unable to even consider them as questions arise regarding AUI's unrelated charges including those filed on November 16 including but not limited to the 10% interest (7% above prime rate at the time) on 100% private financing in a non-arm's length transaction (in fact all purchase and financing is non-arm's length) as all transactions are with related families and his own companies therefore, nothing but transient profit. The actual value of what was purchased in 2017 which seems partially irrelevant to the water distribution system and its valuation. Therefore, this response refers to Staff Report 10823-2022, as I strongly believe the staff's 40.96% Increase is simply excessive and should be reduced to the maximum of inflation for the periods of 2021 and 2022. Please allow me to file a single combined table with explanation of why the rate increase in-line with inflation is more reasonable than the staff's suggested 40.96% increase. The said combined table will take a few extra days for me to prepare with each item well explained.



Executive Summary

The honorable Commission Members, I am 70+ and I want to make sure the commission understands I am looking for fairness. Imagine the chain reaction of increasing the cost beyond the nominal inflation then inflation increase by many folds and carries itself up and down the supply chain. Inflation is an evil which should not be helped and should be crushed, the ugly greed loves inflation so it can use it as an excuse for multi fold increase in profiteering, I believe staff are highly qualified and they are up to this challenge.

My mobile home is my residence and on a limited budget. Probably half the park is like me, the other half snow birdies. I don't think there are any wealthy people living here.

A small operation like this one wouldn't need a CPA or an accountant spending 20% of revenue on accounting reports. A maximum of 100 transactions per year doesn't require a CPA. A single bank account that all income or expense transactions are made and a yearly spreadsheet of these transactions should be sufficient for preparing financial statements and the Staff's professional valuation of such spreadsheet would suffice in my opinion. If need be I would assist AUI free of charge to set this spreadsheet up and how easy he can prepare all his financial statements.

An increase beyond the applicable inflation is disparaging and only a discretionary income for the applicant, Chart 1 and Table 1 show the inflation over the last two years.

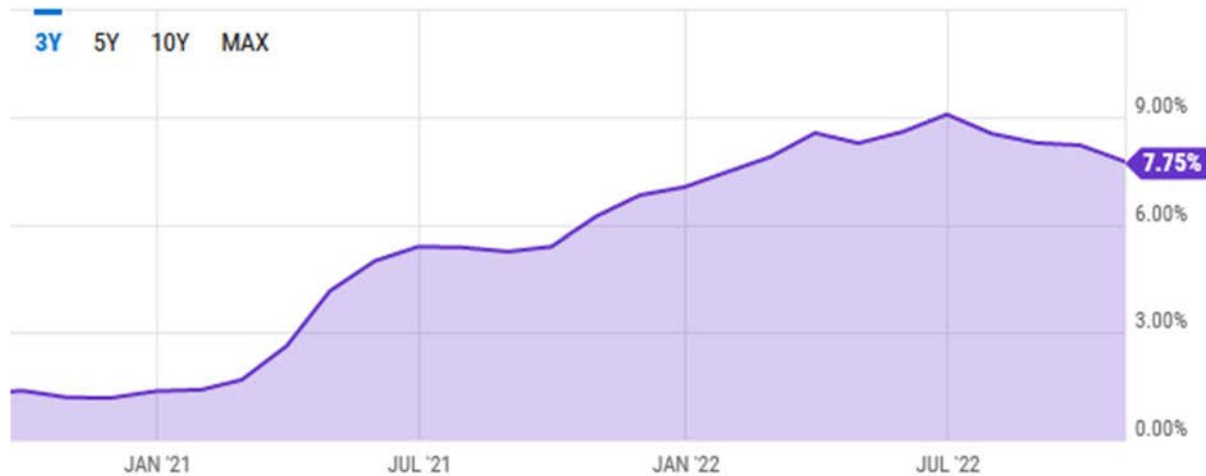


Chart 1: Monthly depiction of Inflation rate over the 2021 and first 10 months of 2022



Table 1. Fair and Reasonable Increased Rate for 2023

Year	Actual Monthly Water Rate	Average Inflation Rate	Calculated Inflation to Reach 2023 Rates	Calculated Monthly Water Rate For 2023
2020	\$14.66			
2021	\$14.79	4.69%	\$0.69	
2022	\$15.26	8.25%	\$1.27	
2023				\$16.61

Note: Inflation rates based on average of 12 months for 2021 and 10 months for 2022

The matter of lack of filtering at the plant level is pronounced in the Picture 1. Which shows one week of filtering at home for about 4.5 Gallons.



Picture 1. A Week of Residue in Water Filter



Al Hashemi

37427 Ray Dr., Zephyrhills, FL 33541 T:(803)310-3337 F:(505)213-9020 hashemi.al@gmail.com

I have spoken with AUI owner and he is a nice person, but my depiction of this particular business activity and the calculated rate of \$16.61 a month (Please See Table 1) is credible and sufficient together with the accumulated depreciation (which seems totally disregarded) to profitably run this business.

I hope the commission will consider all relevant factors which directly relate to the distribution system, not the disparaging charges I have observed in AUI's data and to a significantly lesser degree in Staff's Report.

I thank you for your consideration.

I remain yours with my prayers for a very Happy Holidays and a very Merry Christmas to everyone.

A handwritten signature in blue ink, appearing to read 'Al Hashemi', with a long, sweeping flourish extending to the right.

Al Hashemi

37427 Ray Dr.
Zephyrhills, FL 33541
Hashemi.al@gmail.com
(919) 633-6337