



May 4, 2023

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

*Re: Docket No. 20220201-WS – Explanation of differences on “E” Schedules*

Dear Commission Clerk,

In response to staff inquiries on the differences of number of “bills” on the E-2 and E-14 Schedules, Florida Community Water Systems, Inc. (FCWS) hereby provides the following explanation.

**Schedule E-2w and E-2s**

On the E-2w and E-2s schedules, this calls for the number of Test Year “Bills” by customer class by meter size. When obtaining this information from the utility’s billing system, a further analysis is required if there was a rate change during the test year period. For instance, if there were an index increase or a four year rate reduction during the test period, the utility is required to pro-rate the increase/decrease during the month it is effective. This is required by the Commission depending on the number of days under the old rate and the number of days under the new rate. The billing system data reflects two “charges” during that month for a single customer. Thus, the raw data will show two base facility charges in one month for a single customer, but it was actually one bill. (Example attached) Thus, when reflecting the actual number of “Bills”, these extra “charges” must be removed. To do otherwise would overstate the actual number of bills in that particular month and result in an understated resulting base facility charge on an ongoing basis. This would result in the utility not recovering its appropriate amount of base facility charge revenue. Therefore, on the Schedule E-2w and E-2s, in Column (2), entitled “Number of Bills,” this actually reflects the actual number of bills – and not “charges.”

This has consistently been done in past affiliated utilities’ file and suspend rate cases and staff assisted rate case. (See Docket No. 20220066-WS) In the instant docket, these “duplicate” charges have been removed on the E-2w and E-2s Schedules to properly reflect the actual number of “Bills” and not the number of “Charges.” Similarly, in the past there have been

instances where "Final" or "Open" bills have been removed for similar reasons as these don't reflect a full month charge. This particular adjustment was not done in the current rate restructuring docket.

#### **Schedule E-14**

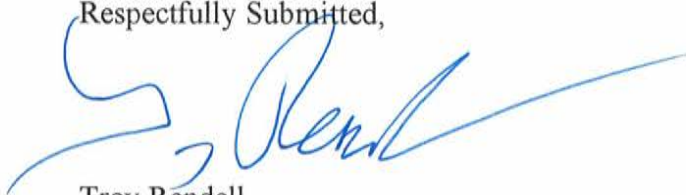
Schedule E-14 is the billing analysis for each customer class by meter size. This schedule is necessary to analyze the number of gallons charged to each customer class during the test year. These schedules are often used by the Commission in order to determine the appropriate inclining gallonage rate structure by gallons. In order to appropriately reflect the actual "Charged Gallons," these duplicate "charges" by gallons are not removed. Following the billing logic above, during a month in a test year where a rate change occurs, a certain number of gallons will be charged at the old rate and a certain number of gallons will be charged at the new rate. These two "charges" will be reflected on one bill during that month. To appropriately reflect the actual number of "charged gallon" both "charges" must be reflected on the E-14 schedule. To do otherwise would reduce the actual gallons charged and would overstate the resulting gallonage charge on a going forward basis. In contrast to the above, this may result in the utility over recovering its gallonage charge revenue.

Thus on the Schedule E-14's filed in the instant case, in Column (2) titled "Number of Bills" and Column (3) titled "Cumulative Bills" – these are actually "Charges" and not bills. As these appropriately reflect the charged gallons and not bills. As previously stated, these charged gallons may be reflected on a single bill and not actually two bills.

FCWS acknowledges that the number of "bills" on the E-2 and E-14 schedules do not and will not equal using this analysis; however, FCWS believes this methodology appropriately reflects the actual number of "Bills" on the E-2 Schedules and the actual number of "charged" gallons on the E-14 Schedules.

If you have any questions, please contact me at (727) 848-8292, ext. 245.

Respectfully Submitted,



Troy Rendell  
Vice President  
Investor Owned Utilities  
*// for Florida Community Water Systems, Inc.*

# FL COM WATER SYSTEM

## USW Utility Billing Center

P.O. Box 151245  
Cape Coral, FL 33915

If you have any questions please contact our customer service number: 1-888-228-2134

Account Number ..... 118284  
Bill Date ..... 07/27/2022  
Due Date ..... 08/16/2022  
Total Amount Due ..... **\$95.08**

For Service To:  
[REDACTED]

Usage Data	Billing Period	Days	Meter Readings	Usage	Units
	06/10/2022	32	6105 Actual	6105	TGAL
	07/12/2022		6193 Actual	6193	
Total Days:		32	Total Usage: 88		TGAL

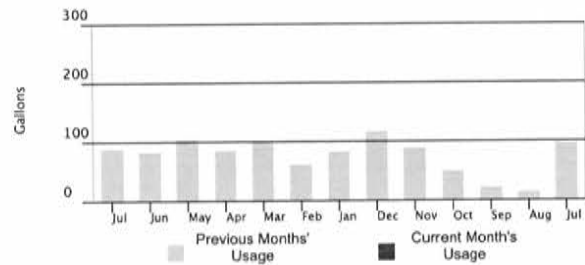
### \$ Billing Detail

Amount Owed From Last Bill ..... - \$27.94  
Adjustments ..... \$0.00  
Total Payments Received ..... \$0.00  
Prior Balance ..... - \$27.94

**New Charges**  
Base Charge..... \$6.30  
Water 58 @ 1.300000..... \$75.40  
Base Charge..... \$3.22  
Water 30 @ 1.270000..... \$38.10  
**Total Water 88 TGAL Charges ..... \$123.02**  
**Total Current Charges ..... \$123.02**

**Total Amount Due 08/16/2022..... \$95.08**

### Water Use History



### Message Center

- View the Harbor Hills 2021 Water Quality Report at: [mywaterservice.com/harborhills2021](http://mywaterservice.com/harborhills2021) The report contains important information about the source and quality of your drinking water. We detected 13 contaminants, none above EPA acceptable level for drinking water. If you prefer a copy mailed to you please call 866 753 8292 or check the box on the back of your payment stub.
- Your statement reflects all payments received and posted through July 21, 2022. Any payments posted after that date will be reflected on your next statement.
- Pay your bill online. Visit [www.mywaterservice.com](http://www.mywaterservice.com) to pay by credit card. A \$2.60 service fee will apply.
- Pay by phone, call 1-844-500-7358.

Please detach along perforation and return this portion with your payment. Keep top portion for your records.

000118284 0009508

**Make Checks Payable To:**  
FL COM WATER SYSTEM  
Billing & Payment Processing Center  
P.O. Box 151245  
Cape Coral, FL 33915-1245

Check this box for address correction or message. Please print on reverse side.  
Acct#: 118284 [REDACTED]

**DO NOT PAY**  
DO NOT PAY - account is being drafted for the amount owed.

[REDACTED]  
[REDACTED]  
LADY LAKE FL 32159

EFT - No Envelope



FL COM WATER SYSTEM  
**C/O US WATER**  
P.O. BOX 151245  
CAPE CORAL, FL 33915-1245

# FL COM WATER SYSTEM

## USW Utility Billing Center

P.O. Box 151245  
Cape Coral, FL 33915

If you have any questions please contact our customer service number: 1-888-228-2134

Account Number ..... 54799034  
Bill Date ..... 07/27/2022  
Due Date ..... 08/16/2022  
Total Amount Due ..... \$136.39

For Service To:

Usage Data	Billing Period	Days	Meter Readings	Usage	Units
	06/09/2022	32	1249 Actual	1249	TOTAL
	07/11/2022		1276 Actual	1276	
	Total Days:	32	Total Usage:	27	TGAL

## \$ Billing Detail

Amount Owed From Last Bill ..... \$104.22  
Adjustments ..... \$0.00  
Total Payments Received ..... \$104.22  
Prior Balance ..... \$0.00

### New Charges

Base Charge..... \$6.00  
Water 17 @ 1.300000..... \$22.10  
Base Charge..... \$3.51  
Water 10 @ 1.270000..... \$12.70

**Total Water 27 TGAL Charges ..... \$44.31**

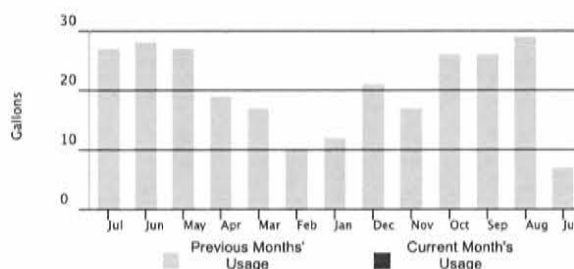
Base Charge..... \$20.39  
Sewer 6 @ 5.040000..... \$30.24  
Base Charge..... \$11.93  
Sewer 6 @ 4.920000..... \$29.52

**Total Sewer Charges ..... \$92.08**

**Total Current Charges ..... \$136.39**

**Total Amount Due 08/16/2022..... \$136.39**

## Water Use History



## Message Center

- View the Harbor Hills 2021 Water Quality Report at: [mywaterservice.com/harborhills2021](http://mywaterservice.com/harborhills2021) The report contains important information about the source and quality of your drinking water. We detected 13 contaminants, none above EPA acceptable level for drinking water. If you prefer a copy mailed to you please call 866 753 8292 or check the box on the back of your payment stub.
- Your statement reflects all payments received and posted through July 21, 2022. Any payments posted after that date will be reflected on your next statement.
- Pay your bill online. Visit [www.mywaterservice.com](http://www.mywaterservice.com) to pay by credit card. A \$2.60 service fee will apply.
- Pay by phone, call 1-844-500-7358.

Please detach along perforation and return this portion with your payment. Keep top portion for your records.

054799034 0013639

### Make Checks Payable To:

FL COM WATER SYSTEM  
Billing & Payment Processing Center  
P.O. Box 151245  
Cape Coral, FL 33915-1245

Check this box for address correction or message. Please print on reverse side.  
Acct#: 54799034 [REDACTED]  
DRIVE

[REDACTED]  
[REDACTED]  
LADY LAKE FL 32159



Amount Due by 08/16/2022	\$136.39
Amount Enclosed: \$	

FL COM WATER SYSTEM  
C/O US WATER  
P.O. BOX 151245  
CAPE CORAL, FL 33915-1245

# FL COM WATER SYSTEM

**USW Utility Billing Center**  
 P.O. Box 151245  
 Cape Coral, FL 33915

If you have any questions please contact our customer service number: 1-888-228-2134

Account Number ..... 118624  
 Bill Date ..... 07/27/2022  
 Due Date ..... 08/16/2022  
**Total Amount Due ..... \$78.17**

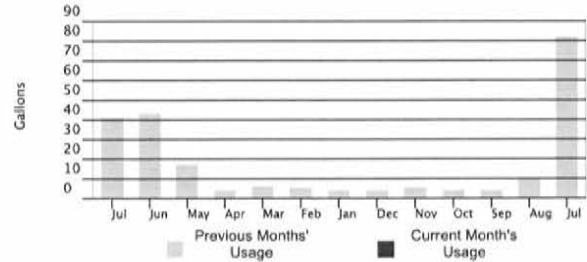
For Service To:

Usage Data	Billing Period	Days	Meter Readings	Usage	Units
	06/09/2022	34	3259 Actual	3259	TOTAL
	07/13/2022		3300 Actual	3300	
	<b>Total Days:</b>	<b>34</b>		<b>Total Usage: 41</b>	<b>TGAL</b>

## \$ Billing Detail

Amount Owed From Last Bill .....	\$76.86
Adjustments .....	\$0.00
Total Payments Received .....	\$76.86
Prior Balance .....	\$0.00
<b>New Charges</b>	
Base Charge.....	\$16.51
Water 27 @ 1.300000.....	\$35.10
Base Charge.....	\$8.78
Water 14 @ 1.270000.....	\$17.78
<b>Total Water 41 TGAL Charges .....</b>	<b>\$78.17</b>
<b>Total Current Charges .....</b>	<b>\$78.17</b>
<b>Total Amount Due 08/16/2022.....</b>	<b>\$78.17</b>

## Water Use History



## Message Center

- View the Harbor Hills 2021 Water Quality Report at: [mywaterservice.com/harborhills2021](http://mywaterservice.com/harborhills2021) The report contains important information about the source and quality of your drinking water. We detected 13 contaminants, none above EPA acceptable level for drinking water. If you prefer a copy mailed to you please call 866 753 8292 or check the box on the back of your payment stub.
- Your statement reflects all payments received and posted through July 21, 2022. Any payments posted after that date will be reflected on your next statement.
- Pay your bill online. Visit [www.mywaterservice.com](http://www.mywaterservice.com) to pay by credit card. A \$2.60 service fee will apply.
- Pay by phone, call 1-844-500-7358.

Please detach along perforation and return this portion with your payment. Keep top portion for your records.

000118624 0007817

**Make Checks Payable To:**  
 FL COM WATER SYSTEM  
 Billing & Payment Processing Center  
 P.O. Box 151245  
 Cape Coral, FL 33915-1245

Check this box for address correction or message. Please print on reverse side.  
 Acct#: 118624 [REDACTED]

[REDACTED]  
 [REDACTED]  
 LADY LAKE FL 32159



Amount Due by 08/16/2022	<b>\$78.17</b>
--------------------------	----------------

Amount Enclosed: \$
---------------------

FL COM WATER SYSTEM  
**C/O US WATER**  
 P.O. BOX 151245  
 CAPE CORAL, FL 33915-1245

# FL COM WATER SYSTEM

## USW Utility Billing Center

P.O. Box 151245  
Cape Coral, FL 33915

If you have any questions please contact our customer service number: 1-888-228-2134

Account Number ..... 54826448  
Bill Date ..... 07/25/2022  
Due Date ..... 08/14/2022  
Total Amount Due ..... \$129.71

For Service To: [REDACTED]

Usage Data	Billing Period	Days	Meter Readings	Usage	Units
	06/08/2022	34	41 Actual	41	TGAL
	07/12/2022		47 Actual	47	
Total Days:		34	Total Usage: 6		TGAL

## \$ Billing Detail

Amount Owed From Last Bill ..... \$36.25  
Adjustments ..... \$0.00  
Total Payments Received ..... \$36.25  
Prior Balance ..... \$0.00

### New Charges

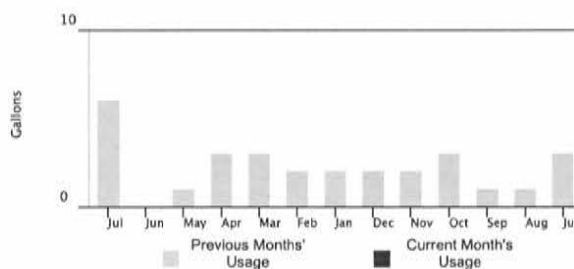
Base Charge..... \$12.70  
Water 4 @ 5.540000..... \$22.16  
Base Charge..... \$7.65  
Water 2 @ 5.390000..... \$10.78  
**Total Water 6 TGAL Charges ..... \$53.29**

Base Charge..... \$12.99  
Wastewater 4 @ 9.340000..... \$37.36  
Base Charge..... \$7.85  
Wastewater 2 @ 9.110000..... \$18.22  
**Total Sewer Charges ..... \$76.42**

**Total Current Charges ..... \$129.71**

**Total Amount Due 08/14/2022..... \$129.71**

## Water Use History



## Message Center

- View the Lakeside Waterworks 2021 Water Quality Report at: [mywaterservice.com/lakeside2021](http://mywaterservice.com/lakeside2021) The report contains important information about the source and quality of your drinking water. We detected 7 contaminants, none above EPA acceptable level for drinking water. If you prefer a copy mailed to you please call 866 753 8292 or check the box on the back of your payment stub.
- Your statement reflects all payments received and posted through July 18, 2022. Any payments posted after that date will be reflected on your next statement.
- Pay your bill online. Visit [www.mywaterservice.com](http://www.mywaterservice.com) to pay by credit card. A \$2.60 service fee will apply.
- Pay by phone, call 1-844-500-7358.

Please detach along perforation and return this portion with your payment. Keep top portion for your records.

054826448 0012971

### Make Checks Payable To:

FL COM WATER SYSTEM  
Billing & Payment Processing Center  
P.O. Box 151245  
Cape Coral, FL 33915-1245

Check this box for address correction or message. Please print on reverse side.  
Acct#: 54826448 [REDACTED]  
TREE DRIVE

[REDACTED]  
LEESBURG FL 34788

EFT - No Envelope



**DO NOT PAY**

DO NOT PAY - account is being drafted for the amount owed.

FL COM WATER SYSTEM  
**C/O US WATER**  
P.O. BOX 151245  
CAPE CORAL, FL 33915-1245