

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificate to operate water utility in Lake County by TLP Water, Inc. | DOCKET NO. 080499-WU
ORDER NO. PSC-09-0542-PAA-WU
ISSUED: August 4, 2009

The following Commissioners participated in the disposition of this matter:

MATTHEW M. CARTER II, Chairman
LISA POLAK EDGAR
KATRINA J. McMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP

NOTICE OF PROPOSED AGENCY ACTION
SETTING RATES AND CHARGES
AND
FINAL ORDER GRANTING WATER CERTIFICATE

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein regarding approval of rates and charges is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

Background

On July 15, 2008, TLP Water, Inc (TLP, applicant, or utility) filed its application for an original water certificate in Lake County. The utility is located in the St. Johns River Water Management District (SJRWMD) area where water use restrictions apply. The utility provides water service to approximately 50 residential customers. Wastewater treatment is provided by septic tanks.

Three Lakes Mobile Home Park is a privately owned property formerly known as Cari's Camp. In 1945, Cari's Camp installed a small 4-inch well to provide water service to the area. A 1948 agreement required Cari's Camp to supply water to the residents on Lakeside Lane and Canal Street, which are located outside of the park. The camp became known as the Three Lakes Mobile Home Park in the 1960s. We received jurisdiction over Lake County in 1972.¹ In 1992, Three Lakes Mobile Home Park was incorporated as a nonprofit cooperative. The mobile home

¹ Order No. 5472, issued June 30, 1972, in Docket No. 5818-WS, In re: Jurisdictional Resolutions from Boards of County Commissioners adopting the Water and Sewer System Regulatory Law, Chapter 71-278, Laws of Florida, (Chapter 367, Florida Statutes). Resolution Adopted by Lake County.

DOCUMENT NUMBER-DATE

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PSC-COMMISSION CLERK

park believed it was exempt from our jurisdiction, pursuant to Section 367.022, Florida Statutes (F.S.); however, the utility continued to serve customers outside the cooperative, which actually rendered it subject to our jurisdiction.

In 2008, a customer complaint was filed with us against the utility indicating that it was providing water service to residents outside the co-op membership. Upon review of the complaint, our staff contacted the utility and informed it that it appeared that the utility was not exempt from our regulation. Also, our staff informed the utility that it needed to apply for and be granted a certificate to operate a water utility. Subsequently, in 2008, TLP Water, Inc. was incorporated as the water utility.

On July 15, 2008, the President of TLP filed an application for a certificate to operate a water utility. In January 2009, several customers objected to TLP's application. The objections were based upon the Lakeside Lane and Canal Street customers' belief that their 1948 contract agreement absolved them of the responsibility to pay the cost for repairs and renovations to the water system. Moreover, the Lakeside Lane and Canal Street customers objected because they wanted clarification on how the cost would be apportioned between co-op members and non-co-op members.

On February 12, 2009, we held an informal meeting with the interested parties of TLP. At the meeting, we addressed the Lakeside Lane and Canal Street customers' concerns and their objections. Also at the meeting, the parties agreed to the water service rate of \$39.00 per month, a continuation of a 2008 negotiated agreement between TLP and its customers on Lakeside Lane and Canal Street to recover the operational costs. On May 7, 2009, the representatives for TLP and the customers living on Lakeside Lane and Canal Street provided us with a letter indicating the withdrawal of their objections.

Pursuant to Section 367.031, F.S., we shall grant or deny an application for a certificate of authorization within 90 days after the official filing date of the completed application. TLP's application was complete on March 9, 2009; however, the objections filed in January 2009 were not withdrawn and resolved until May 8, 2009. Thus, the official filing date is deemed to be May 8, 2009.

This order addresses the application for an original water certificate. We have jurisdiction pursuant to Sections 367.031 and 367.045, F.S.

Decision

Operating without a Commission Certificate

Section 367.031, F.S., provides that "each utility subject to the jurisdiction of the commission must obtain from the commission a certificate of authorization to provide water or wastewater service." Moreover, Section 367.161(1), F.S., authorizes us to assess a penalty of not more than \$5,000 for each offense, if a utility is found to have knowingly refused to comply with, or to have willfully violated any provision of Chapter 367, F.S. Utilities are charged with the knowledge of our statutes and rules. Thus, any intentional act, such as TLP providing water

service to the public for compensation since 1948, without first obtaining a certificate of authorization from us would meet the standard for a “willful violation” of Section 367.161(1), F.S. In Order No. 24306, issued April 1, 1991, in Docket No. 890216-TL, In Re: Investigation Into The Proper Application of Rule 25-14.003, Florida Administrative Code (F.A.C.), Relating to Tax Savings Refund For 1988 and 1989 For GTE Florida, Inc., having found that the company had not intended to violate the rule, we nevertheless found it appropriate to order the utility to show cause why it should not be fined, stating that “in our view, ‘willful’ implies an intent to do an act, and this is distinct from an intent to violate a statute or rule.” Additionally, “it is a common maxim, familiar to all minds that ‘ignorance of the law’ will not excuse any person, either civilly or criminally.” Barlow v. United States, 32 U.S. 404, 411 (1833).

Although TLP’s failure to obtain certificates of authorization from us prior to charging the public for service is an apparent violation of the statute, there are circumstances which appear to mitigate the apparent violation. As stated previously, the utility has been providing water service to the public for compensation since 1948. In 1972, the County turned over jurisdiction to us; however, TLP believed that it was exempt from our rule and regulations. It was not until a complaint was filed by one of TLP’s customers that the utility learned that it was not exempt from our rules and regulation. The utility promptly began the application process for certification in 2008. In light of these circumstances, we do not believe that the apparent violation of Section 367.031, F.S., rises to the level of warranting a show cause order.

Therefore, for the reason stated above, we find that TLP shall not be show caused for providing water service to the public for compensation without first obtaining certificates of authorization from us in apparent violation of Section 367.031, F.S.

Unauthorized Rates

As stated previously, TLP has been charging unauthorized rates for water service to the public from 1972 to present. According to the information provided in the application, TLP initially believed its systems were exempt from our regulation. TLP was not aware that we received jurisdiction in the County in 1972. It was not until a complaint was filed by one of TLP’s customers that the utility learned that it was not exempt from our rules and regulation and that it not authorized to charge the public rates for its water service. At that point, TLP learned of the application process for certification and began its application.

Section 367.081(1), F.S., provides that a utility may only charge rates and charges that have been approved by us. Section 367.091(3), F.S., requires that each utility’s rates, charges, and customer service policies be contained in a tariff approved by and on file with us. Rule 25-30.135(1) and (2), F.A.C., requires utilities to file tariffs and prohibits utilities from modifying or revising their rules, regulations, or schedules of rates and charges until they file and receive approval from us for any such modification or revision. By charging the public for water service without our approval while subject to our jurisdiction, TLP is in apparent violation of the above-identified statutes and rule.

Section 367.161(1), F.S., authorizes us to assess a penalty of not more than \$5,000 for each offense, if a utility is found to have knowingly refused to comply with, or to have willfully

violated any provision of Chapter 367, F.S. By charging the public for water service since 1972 without our approval, the utility's act was "willful" in the sense intended by Section 367.161, F.S. In Order No. 24306, issued April 1, 1991, in Docket No. 890216-TL, In Re: Investigation Into The Proper Application of Rule 25-14.003, Florida Administrative Code, Relating to Tax Savings Refund For 1988 and 1989 For GTE Florida, Inc., having found that the company had not intended to violate the rule, we nevertheless found it appropriate to order the utility to show cause why it should not be fined, stating that "[i]n our view, 'willful' implies an intent to do an act, and this is distinct from an intent to violate a statute or rule." Additionally, "it is a common maxim, familiar to all minds that 'ignorance of the law' will not excuse any person, either civilly or criminally." Barlow v. United States, 32 U.S. 404, 411 (1833).

Although TLP's failure to obtain our approval prior to charging its rates from 1972 to present is an apparent violation of Sections 367.081(1) and 367.091(3), F.S., and Rule 25-30.135, F.A.C., there are circumstances which appear to mitigate the utility's apparent violation. As stated, the utility mistakenly believed that it was exempt from our regulation. For example, to resolve a dispute concerning rate increase, TLP and some of its customers negotiated an agreement of \$39 per month. When the utility became aware that it subject to our regulations, TLP took the appropriate steps to correct its violation. TLP has filed for an original certificate and its application was deemed complete on May 8, 2009. We note that prior to the 2008 agreement to increase the water service rate to \$39 per month between TLP and its customers on Canal Street and Lakeside Lane, the utility has not increased its monthly rates since it was first implemented in 1948. Also, upon review of the utility's existing rates, we note that the revenues generated from the existing water service rates appear to be less than the cost of providing those services. We do not believe that the customers have been harmed by the unauthorized rates and charges. Therefore, we do not believe that the apparent violation of Sections 367.081(1) and 367.091(3), F.S., and Rule 25-30.135, F.A.C., rises in these circumstances to the level which warrants the initiation of a show cause proceeding.

For the foregoing reasons, we decline to order TLP to show cause for charging unauthorized rates from 1972 to present. However, we place the utility on notice that it must charge our approved rates and charges until authorized to change by us, and that such apparent statutory and rule violations will not be tolerated in the future.

Annual Report

Rule 25-30.110(3), F.A.C., provides that each utility shall file with the Commission annual report. The obligation to file an annual report for any year shall apply to any utility which is subject to this Commission's jurisdiction as of December 31 of that year, whether or not the utility has actually applied for or has been issued a certificate. During the time that the utility was subject to our jurisdiction, it failed to file its annual reports; therefore, the utility is in apparent violation of Rule 25-30.110(3), F.A.C. Rule 25-30-110(6), F.A.C., provides that a penalty shall be assessed against any utility that fails to file annual report unless the utility demonstrates good cause for noncompliance. Further, the rule states that we may, in our discretion, impose penalties for noncompliance that are greater or lesser than provided by the rule.

Utilities are charged with the knowledge of our rules and statutes. As stated, "it is a common maxim, familiar to all minds that ignorance of the law will not excuse any person, either civilly or criminally" Barlow, 32 U.S. at 411. Thus, any intentional act, such as the utility's failure to file its annual report for any given year, would meet the standard for a "willful violation." Also, as stated, In re: Investigation Into The Proper Application of Rule 25-14.003, F.A.C., Relating To Tax Savings Refund for 1988 and 1989 For GTE Florida, Inc., having found that the company had not intended to violate the rule, we nevertheless found it appropriate to order it to show cause why it should not be fined, stating that willful implies an intent to do an act, and this is distinct from an intent to violate a statute or rule." Id. at 6. Section 367.161, F.S., authorizes us to assess a penalty of not more than \$5,000 for each offense, if a utility is found to have knowingly refused to comply with, or to have willfully violated any of our rules, order or provision of Chapter 367, F.S.

However, we believe that there are mitigating circumstances in this case which lead us to believe that show cause proceedings are not warranted at this time, and we shall not assess penalties against the utility for failure to file annual reports from 1972 to 2007. As discussed above, TLP initially believed it was exempt from regulation because of its nonprofit cooperative status. It was not until a complaint was filed by a customer that the utility learned that it was not exempt from regulation. We note that the utility has been very cooperative in its efforts to come into compliance with our rules and statutes, and has filed its 2008 annual report. Under these circumstances, we believe that the apparent violation of 25-30.110(3), F.A.C., does not rise in these circumstances to the level of warranting the initiation of a show cause proceeding. Moreover, we believe that TLP has demonstrated good cause for its apparent noncompliance, and shall not be assessed a penalty.

Therefore, we find that the utility shall not be ordered to show cause why it should not be fined for its failure to file its annual reports from 1972 to 2007. Moreover, we find that no penalties shall be assessed against TLP. As stated, the utility has filed its 2008 annual report.

Regulatory Assessment Fees

Pursuant to Sections 350.113(3)(e) and 367.145, F.S., and Rule 25-30.120(1), F.A.C., each water and wastewater utility shall remit to us annually RAFs in the amount of 0.045 of its gross operating revenue. Pursuant to Rule 25-30.120(2), F.A.C., "the obligation to remit the RAFs for any year shall apply to any utility which is subject to our jurisdiction on or before December 31 of that year or for any part of that year, whether or not the utility has actually applied for or has been issued a certificate. Accordingly, TLP is responsible for RAFs for the time period of 1972 through December 31, 2008. In failing to remit the RAFs for this time period, TLP is in apparent violation of the above-referenced statutory and rule provisions.

Utilities are charged with the knowledge of our rules and statutes. As previously stated, "it is a common maxim, familiar to all minds that ignorance of the law will not excuse any person, either civilly or criminally." Barlow, 32 U.S. at 411. Thus, any intentional act, such as the utility's failure to remit its RAFs, would meet the standard for a "willful violation." Also, as previously stated, In re: Investigation Into The Proper Application of Rule 25-14.003, F.A.C.,

Relating To Tax Savings Refund for 1988 and 1989 For GTE Florida, Inc., having found that the company had not intended to violate the rule, we nevertheless found it appropriate to order it to show cause why it should not be fined, stating that willful implies an intent to do an act, and this is distinct from an intent to violate a statute or rule. Id. at 6. Section 367.161, F.S., authorizes us to assess a penalty of not more than \$5,000 for each offense, if a utility is found to have knowingly refused to comply with, or to have willfully violated any of our rules, order or provision of Chapter 367, F.S.

As discussed above, we believe that there are mitigating circumstances in this case which leads us to believe that show cause proceedings are not warranted at this time. As previously discussed, the utility was established in 1948. The County turned over jurisdiction to the Commission in 1972. TLP believed that as a non-profit co-op, it was exempt from our jurisdiction. However, the primary purpose of paying RAFs is to defray costs incurred by us in regulating jurisdictional utilities. We note that we have not expended any resources or dollars regulating TLP until 2008, the year the utility filed for its certificate. Section 350.113(3), F.S., states that RAFs shall to the extent practicable, be related to the cost of regulating such type of regulated company. We therefore believe that it is appropriate that we assess TLP RAFs for 2008. Finally, TLP has been very cooperative with in its efforts to come into compliance with our rules. TLP has paid its 2008 RAFs in the amount of \$1,013.40. This amount was calculated based upon annual revenues of approximately \$22,520 for the 12 months ended December 30, 2008, as filed with the company's annual report.

For the foregoing reasons, we do not believe that the apparent violation of Sections 350.113(3)(e) and 367.145, F.S., and Rule 25-30.120(1), F.A.C., rises in these circumstances to the level of warranting the initiation of a show cause proceeding. Therefore, we decline to order TLP to show cause, in writing within 21 days, why it should not be fined for its failure to remit its RAFs from 1972 through 2007.

Application for Water Certificate

TLP filed its completed application for an original water certificate to provide service in Lake County on March 9, 2009. The application is in compliance with the governing statute, Section 367.045, F.S., and other pertinent statutes and administrative rules concerning an application for original certificate. In addition, the application contains proof of compliance with the noticing provisions set forth in Rule 25-30.030, F.A.C. As previously mentioned, there were several objections to the notice of application; however, all objecting parties withdrew their objections on May 8, 2009.

The application includes a proprietary lease in the name of the TLP Water, Inc., which includes the water facilities that are located on lot 9 in the Three Lakes Park mobile home community. Adequate service territory and system maps and a territory description have been provided as prescribed by Rule 25-30.033(1)(l),(m) and (n), F.A.C. A description of the territory requested by the applicant is appended to this memorandum as Attachment A.

The applicant appears to have the financial and technical ability to provide water service to the proposed service area. Regarding financial ability, the application indicates that the Three Lakes Park Co-op, Inc. has and continues to provide necessary funds to cover the operational shortfalls of TLP Water, Inc. However, the operational expenses of the utility are depleting the park's reserves, and adequate funding is needed; therefore, the utility has applied for a staff assisted rate case (SARC).²

Regarding the applicant's technical ability, the applicant has been operating and maintaining the utility over the years with the help of a licensed plant operator. The utility contracts for testing. There are no outstanding issues with St. Johns River Water Management District. There are outstanding issues with the Department of Environmental Protection (DEP), including distribution system replacements; however, DEP is working with the utility to resolve these issues.

The applicant is aware that it must maintain its books and records according to the National Association of Regulatory Utility Commissioners Uniform System of Accounts. TLP has filed its 2008 annual report and has paid its 2008 RAFs. In addition, the applicant is aware that it may not change rates, serve outside its certificated territory, or sell the utility without prior Commission approval.

Based on the above information, we find that it is in the public interest to grant TLP Water, Inc. Certificate No. 644-W to serve the territory described in Attachment A, effective the date of our vote. The resultant order should serve as the utility's water certificate and it shall be retained by TLP Water, Inc.

Rates and Charges

According to the application, the existing flat \$39 monthly rate was based on the utility's 2007 operating and maintenance expenses and was agreed to by all customers in a 2008 mediation. In the mediation, the utility reported revenue of \$13,860 and operating and maintenance expenses of \$25,273. Therefore, we find that the existing water rate charged by TLP, as shown on Schedule No. 1, attached hereto, shall be approved. As previously noted, the utility has already applied for a SARC to address its revenue shortfall, as well as capital improvements being required by DEP. TLP shall be required to charge the approved rate until authorized to change by us in a subsequent proceeding. The rate shall be effective for services rendered or connections made on or after the stamped approval date on the tariff sheets pursuant to Rule 25-30.475, F.A.C.

Miscellaneous Service Charges and Late Fees

The utility's request for miscellaneous service charges and a late payment fee were accompanied by its reason for requesting the charges, as well as the cost justification required by Section 367.091, F.S. The utility's proposed miscellaneous service charges and late payment

² Docket No. 090244-WU, In re: Application for a staff-assisted rate case in Lake County by TLP Water, Inc., filed April 28, 2009.

charge are shown on Schedule No. 1. Pursuant to Rule 25-30.460, F.A.C., all water and wastewater utilities may apply for miscellaneous service charges. These charges include initial connections, normal reconnections, violation reconnections, and premises visit charges.

The utility's requested miscellaneous service charges are based on the hourly rate of the plant operator and bookkeeper and overhead costs including transportation, supplies, and billing expenses. The utility will only be charging miscellaneous service charges when a specific customer requests the service or is responsible for the service. The utility's justification for the miscellaneous service charges is to place the burden of these charges on the cost-causer rather than the general body of ratepayers.

Based on the utility's expenses, the proposed miscellaneous service charges appear to be reasonable. Therefore, we find that the utility's proposed miscellaneous service charges, as shown on Schedule No. 1, shall be approved.

In addition to the miscellaneous service charges, the utility proposed a \$5.00 late payment fee. The late payment fee is designed to encourage customers to pay their bills on time to ensure that the cost associated with late payment is not passed onto customers who do pay on time. The estimated cost provided by the utility appears reasonable. Therefore, the utility's requested late fee of \$5.00 shall be approved.

Therefore, we find that TLP's proposed miscellaneous service charges and late fee, shown on Schedule No. 1, are consistent with Commission rules and shall be approved. The deposits and charges shall be effective for services rendered on or after the stamped approval date on the tariff sheets pursuant to Rule 25-30.475, F.A.C.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that TLP Water, Inc. is granted Certificate No. 644-W to provide water service in the territory described in Attachment A, which is attached to this Order and incorporated herein, effective July 14, 2009. It is further

ORDERED that TLP Water, Inc., shall not be ordered to show cause for operating a water utility without a certificate of authorization in apparent violation of Section 367.031, F.S. It is further

ORDERED that TLP Water, Inc., shall not be ordered to show cause for charging unauthorized rates in apparent violation of Section 367.08(1) & 367.091(3), F.S., and Rule 25-30.135, F.A.C. It is further

ORDERED that TLP Water, Inc., shall not be ordered to show cause for failing to file annual reports in apparent violation of Rule 25-30.110(3), F.A.C. It is further

ORDERED that TLP Water, Inc., shall not be ordered to show cause for failing to remit its regulatory assessment fees in apparent violation of Section 367.145, F.S., and Rule 25-30.120, F.A.C. It is further

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ORDERED that the TLP Water, Inc.'s rates and charges are approved as set forth herein. It is further

ORDERED that the miscellaneous service charges and late fees are approved for TLP Water, Inc., as set forth herein. It is further


ORDERED that TLP Water, Inc.'s rates and charges shall be effective for services rendered or connections made on or after the stamped approval date of the tariff sheets pursuant to Rule 25-30.475, Florida Administrative Code. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto.

ORDERED that if no timely protest is filed by a substantially affected person to proposed agency action, a consummating order should be issued upon expiration of the protest period and the docket should be closed.

By ORDER of the Florida Public Service Commission this 4th day of August, 2009.

ANN COLE
Commission Clerk

By: 
Dorothy E. Menasco
Chief Deputy Commission Clerk

(SEAL)

KY

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

As identified in the body of this order, our action regarding the rates and charges is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Office of Commission Clerk, at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on August 25, 2009. If such a petition is filed, mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing. In the absence of such a petition, this order shall become effective and final upon the issuance of a Consummating Order.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

Any party adversely affected by the Commission's final action in this matter may request: (1) reconsideration of the decision by filing a motion for reconsideration with the Office of Commission Clerk, within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or (2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water or wastewater utility by filing a notice of appeal with the Office of Commission Clerk and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

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Attachment A
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TLP Water, Inc.
Description of Water Territory
Lake County

Three Lakes Mobile Home Park and Sunset View

In Sections 19 and 30, Township 19 South, Range 26 East:

The Southwest quarter of Section 19, less and except that finger of land lying north and west of the Dead River Canal outlet to Lake Eustis; and,

In Section 30, Township 19 South, Range 26 East, the Northwest quarter of Section 30 lying north of US Highway 441, less the east 330 feet thereof.

FLORIDA PUBLIC SERVICE COMMISSION
authorizes
TLP Water, Inc.
pursuant to
Certificate Number 644-W

to provide water service in Lake County in accordance with the provisions of Chapter 367, Florida Statutes, and the Rules, Regulations, and Orders of this Commission in the territory described by the Orders of this Commission. This authorization shall remain in force and effect until superseded, suspended, cancelled or revoked by Order of this Commission.

<u>Order Number</u>	<u>Date Issued</u>	<u>Docket Number</u>	<u>Filing Type</u>
PSC-09-0542-PAA-WU	08/04/09	080499-WU	Original Certificate

TLP WATER, INC.
Residential and General
Monthly Service Rate

Meter Size

Flat Rate

All Meter Sizes

\$ 39.00

MISCELLANEOUS SERVICES CHARGES

	Office Hours	After Hours
Initial Connection	\$30.00	\$ 45.00
Normal Reconnection	\$30.00	\$ 45.00
Violation Reconnection	\$30.00	\$ 45.00
Premises Visit	\$15.00	\$ 30.00
Late Fee	\$ 5.00	