



WITHLACOOCHEE
RIVER
ELECTRIC
COOPERATIVE, INC.

August 23, 2007

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COMMISSION
CLERK

Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

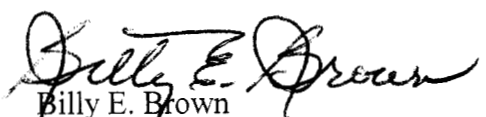
Dear Ms. Cole:

Please find enclosed five (5) copies of Withlacoochee River Electric Cooperative, Inc.'s revised Tariff Sheets No. 5.1.0 and 5.3.0 both containing a consumer charge of \$11.50 per month. These revisions have been approved by our Board of Trustees to become effective January 1, 2008.

Also enclosed is one (1) copy of the revised tariff sheets in legislative format and documentation supporting the revision.

If you have any questions or require further information regarding this filing, please do not hesitate to let me know.

Very truly yours,


Billy E. Brown
General Manager

- CMP _____
- COM _____
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- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC _____
- OTH _____

Enclosures

DOCUMENT NUMBER - DATE
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FPSC-COMMISSION CLERK

P.O. Box 278, Dade City, FL 33526-0278

Phone (352) 567-5133 / Fax (352) 521-5971

REQUEST FOR CONSUMER CHARGE INCREASE

EFFECTIVE JANUARY 1, 2008

Introduction

Withlacoochee River Electric Cooperative, Inc. (the "Cooperative" or "WREC") provides electric service to approximately 200,000 member-consumers in central Florida, ninety percent (90%) of which are residential and nine percent (9%) are general service consumers. These residential and general service consumers are billed under Rate Schedule "RR" and "GS" respectively. Both rate schedules employ a two-part monthly rate structure consisting of a Consumer Charge and a flat Energy Charge. Although the tariff sheets showing the present charges in Rate Schedules "RR" and "GS" having an effective date of April 1, 1999, the Consumer Charge of \$9.75 has actually been in effect for both rate schedules since January 1, 1993.

Given the substantial increases in the cost of labor and materials experienced by the Cooperative in recent years, it is necessary for the Cooperative to increase its revenues to recover those cost increases and maintain a sound financial position. As described below, the Cooperative's management and Board of Trustees believe the most appropriate way to produce the needed revenue increase is to raise the Consumer Charge in Rate Schedule "RR" and "GS" effective January 1, 2008.

Basis for Consumer Charge Increase

Raising the present Consumer Charge applicable to residential and general service consumer is a reasonable, cost-based rate revision. While changes in wholesale purchased power expenses can

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be recovered via the Cooperative's Wholesale Power Adjustment Clause and Fuel Adjustment Clause, increased costs associated with the Cooperative's electric distribution system have no corresponding cost recovery adjustment mechanism. Thus, the base rate components of the tariff must be revised to recover increases labor, materials and other costs incurred by the Cooperative to deliver power and energy to its member-consumers. Since these two rate classes comprises the vast majority of the Cooperative's consumers, and since the Consumer Charge is designed to recover only distribution system costs, it is appropriate to revise that base rate component to recover some increase in those costs.

The Consumer Charge should recover that portion of the distribution system costs related to customer-related expenses such as customer accounts (meter reading, billing, records and collection) and customer service and information (customer assistance, advertising). These expenses are labor intensive and customer service driven. They mainly vary with the number of customers served rather than the amount of the customer's energy consumption or maximum demand. The Consumer Charge should also recover expenses associated with WREC owning, operating, and maintaining the customer-related portion of the Cooperative's electric distribution system. Those expenses include operations, maintenance, depreciation, and interest expense on distribution system utility plant items such as meters and service drops, and the customer-related portion of transformers, overhead and underground conductors, and poles. Those expenses are a function of the costs of both labor and materials.

Labor costs include not only wages and salaries, but overhead costs such as medical benefits as well. During the past three years, these labor overhead costs have increased an average of forty-four percent (44%). Labor and overhead cost increases have also impacted the costs of using outside

contractors to perform right-of-way maintenance and pole testing services, contributing to an increase in right-of-way expenses of twenty-six percent (26%) compared to three years ago.

The high demand for construction materials since Hurricanes Rita and Katrina, particularly steel, has caused tremendous increases in the cost of transformers, conductors, and other items that the Cooperative must continually purchase for upgrading and extending its electric distribution system, and for ordinary replacements. For example, the cost of a commonly installed 50 kVA pad mounted transformer has increased from an average installed cost of \$948 in 2004 to a current average installed cost of \$1,442, or fifty-two percent (52%). Similarly, the current cost of 1/0 triplex overhead conductor of \$3.29 per installed foot reflects an increase of \$.59 per foot, or twenty-two percent (22%), compared to the \$2.70 per foot cost in 2004.

The effect of these cost increases has been understandably detrimental to the Cooperative's overall financial position. In fact, the June 2007 year-to-date operating margin is a deficit of just over \$1,000,000.

Revision to Consumer Charge

When the present residential and general service Consumer Charge of \$9.75 was implemented nearly 15 years ago, WREC's allocated cost of service study (based on a calendar year 1991 test period) indicated that the customer-related cost for the residential rate class was \$10.83 per month. Given the increases in the Cooperative's distribution system expenses described above, there is no doubt that a current cost-based Consumer Charge should be much higher than the present \$9.75. Although WREC has not performed a recent allocated cost of service study, other electric cooperatives in Florida have conducted such studies and used them to support increasing the

Consumer Charge in their residential rate schedules. In one instance, Choctawhatchee ECI recently raised both its residential and general Customer Charge from \$18.00 to \$24.00 (single-phase) and \$34.60 for three phase on the basis that its calendar year 2000 cost of service study indicated a customer-related cost in excess of that amount. Even more recently, Gulf Coast ECI increased its residential Customer Charge from \$10.00 to \$19.45 and its general service to \$22.50, effective September 1, 2007.

In light of the foregoing, the Cooperative's Board of Trustees recently approved an increase in the residential and general service Consumer Charges to be phased-in over a five-year period. These charges will be increased by \$1.75 effective January 1st each year for years 2008 through 2012. The Consumer Charges resulting from the first step of the phase-in beginning January 1, 2008 will be \$11.50. The Consumer Charges resulting from the second step of the phase-in effective January 1, 2009 will be \$13.25, and so on. After the phase-in is completed, the Customer Charges for these two rate classes billed on and after January 1, 2012 will be \$18.50. Although that charge is significantly higher than WREC's present charge of \$9.75, the overall change will be experienced gradually by WREC's consumers over five years, a much less abrupt increase than the two cooperative examples cited above. Furthermore, the \$18.50 Consumer Charge that would not be effective until calendar year 2012 is lower than the Customer Charges already being billed by those two electric cooperatives.

Provided herewith is the revised tariff Sheet No. 5.1.0 that contains the Consumer Charge of \$11.50 effective January 1, 2008. Subsequent tariff sheet revisions incorporating each \$1.75 increase in the Customer Charge during the following four years of the phase-in period will be submitted for review by the Staff of the Florida Public Commission each year prior to implementation.

**WITHLACOOCHEE RIVER ELECTRIC
COOPERATIVE, INC.**

RESIDENTIAL SERVICE

RATE SCHEDULE "RR"

AVAILABLE:

Available throughout the area served by the Cooperative.

APPLICABLE:

Applicable for all domestic uses (lighting, cooking, heating, refrigeration and incidental power) of a residential consumer in a separately metered, single-family dwelling unit.

LIMITATIONS:

Subject to all of the rules and regulations of this tariff and rules and regulations of the Cooperative. Resale of electric service not permitted.

MONTHLY RATE:

Consumer Charge: \$11.50 per month

Energy Charge: \$.04420 per Kwh

MINIMUM CHARGE:

Consumer Charge.

TERMS OF PAYMENT:

Bills rendered hereunder are due and payable upon receipt subject to Terms of Payment described in Section 400 and contained in the Cooperative's Rules and Regulations for Electric Service.

(Continued on Sheet No. 5.1.1)

**WITHLACOCHEE RIVER ELECTRIC
COOPERATIVE, INC.**

GENERAL SERVICE NON-DEMAND

RATE SCHEDULE "GS"

AVAILABLE:

Throughout the area served by the Cooperative subject to the Cooperative's Rules and Regulations for Electric Service.

APPLICABLE:

To any general service consumer for light and power purposes whose highest measured 15-minute interval demand has not exceeded 49 KW during the current billing period, unless the demand exceeds 24 KW and it is beneficial to the consumer to be billed on Rate Schedule "LP". Service hereunder is not applicable to standby, emergency or resale service.

CHARACTER OF SERVICE:

Single or three phase, sixty (60) hertz, at available standard voltage.

MONTHLY RATE:

Consumer Charge: \$11.50 per month

Energy Charge: \$.04220 per Kwh

MINIMUM CHARGE:

The Consumer Charge.

TERMS OF PAYMENT:

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(Continued on Sheet No. 5.3.1)

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Issued By Billy E. Brown Effective January 1, 2008
General Manager

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