

# City of Vero Beach

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OFFICE OF THE  
CITY ATTORNEY

COMMISSION  
CLERK

March 29, 2011

Ms. Ann Cole, Commission Clerk  
Office of Commission Clerk  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**RE: City of Vero Beach Response to Commission Staff data request no. 2  
Docket No. 090524-EM – Complaint of Stephen J. Faherty and Glenn Fraser  
Heran against the City of Vero Beach**

Dear Ms. Cole:

Please allow this letter to serve as the City of Vero Beach's response to the Public Service Commission Staff's Data Request No. 2 transmitted on March 22, 2011 regarding Question No. 8 from Staff's Data Request No. 1. The response provided herein represents the information provided this office by the City's staff and is intended for clarification as to the available data. An original and five (5) copies of this response are provided as requested by Ms. Martha C. Brown, Senior Attorney.

The question presented by the Staff's Data Request No. 2 asks that the City use the same process that was used to determine the number of customers and meters in 2007 to generate comparable information for 2010. As more fully explained and clarified below, the process used in 2007 is not available to the City for calculation of 2010 numbers. However, as also explained, the 2007 data should still be statistically relevant. The previous question No. 8 and the City's response are restated for ease of reference.

- (8) Table 4-2 of the cost of service study indicates that the total estimated number of meters for the 2010 Test Year is 33,408. This table also provides a breakdown of the total number of meters by rate classification. Provide the number of customers within each rate classification, if that number is different than the number of meters by rate classification indicated on Table 4-2.

**Previous Response By COVB:** The number of meters would be different from the number of customers as historically shown by the 2007 numbers, but there are no existing reports that provide the exact numbers/data for the time period in question that makes possible an accurate comparison of the number of meters to customers. The cost of service study performed by the City's consultant was designed to focus on meters and the associated usage to properly determine cost and revenue and did not determine the number of customers.

COM \_\_\_\_\_  
APA \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL A \_\_\_\_\_  
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**COVB Response to Data Request No. 2:** The data regarding the number of customers versus the number of meters existing as of September 30, 2007 was determined using a custom report computer program that was specially written/created and run by a City employed Billing System Administrator utilizing approximately 1600 criteria to specifically take a "snapshot" of the City's billing system for a particular point back in time (September 30, 2007). The Billing System Administrator left employment with the City in June 2010 and the position has not been filled due to defunding of the position as a result of budgetary and fiscal constraints. The City does not have any other employee having the required knowledge, capabilities, or expertise in writing the required programming to now produce a report going back in time for a specified date. The City would have to contract with a qualified firm or individual to perform the programming at the expenditure of substantial time and monetary expense in order to take another "snapshot" back in time.

However, what can be readily determined is the number of meters as of December 31, 2010, which can be compared to the number determined for the 2007 date. That number for 2010 went down by approximately 144 from the 2007 number. Such a number being statistically de minimis, it is reasonable to presume that the 2007 numbers for both meters and customers are still relatively valid from a statistical comparison perspective.

The numbers previously determined for September 30, 2007 are restated below:

	<u>Retail Electric Customers</u>	<u>Retail Electric Meters</u>	
<b><u>Residential:</u></b>	<b><u>Inside</u></b>	<b><u>8,189</u></b>	<b><u>9,557</u></b>
	<b><u>Outside</u></b>	<b><u>15,208</u></b>	<b><u>17,748</u></b>
	<b><u>Total</u></b>	<b><u>23,397</u></b>	<b><u>27,305</u></b>
<b><u>Commercial:</u></b>	<b><u>Inside</u></b>	<b><u>2,317</u></b>	<b><u>2,704</u></b>
	<b><u>Outside</u></b>	<b><u>2,139</u></b>	<b><u>2,497</u></b>
	<b><u>Total</u></b>	<b><u>4,456</u></b>	<b><u>5,201</u></b>
<b><u>Industrial:</u></b>	<b><u>Inside</u></b>	<b><u>1</u></b>	<b><u>1</u></b>
<b><u>Grand Total:</u></b>		<b><u>27,854</u></b>	<b><u>32,507</u></b>

Respectfully submitted,

CITY OF VERO BEACH

Copies to: Stephen J. Faherty  
Glenn Fraser Heran  
Monte Falls, Interim City Manager



Wayne R. Coment  
Acting City Attorney