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Public Service Commission

June 29, 2011

Danny Mays
R.A.M. Golf Management, LLC
7500 South Highway, A1A
Melbourne Beach, FL 32951

STAFF'S FIRST DATA REQUEST

Re: Complaint No. 1009000W - Complaint by R.A.M. Golf Management, LLC against Aquarina Utilities, Inc. for improper billing.

Dear Mr. Mays:

By this letter, the Commission staff requests that R.A.M. Golf Management, Inc. (R.A.M.) provide responses to the following data requests. Please label and identify each response so it is clear which response corresponds to which question. In addition, please do not provide extraneous, additional information if it is not directly responsive to the question.

1. Have R.A.M. and Aquarina Utilities, Inc. (Aquarina) reached an agreement regarding the number of gallons of irrigation water that were used by The Island Links at Aquarina Golf Course (TILA) during the billing period in dispute? If yes, please provide the number of gallons used and total amount due, and please state whether R.A.M. has agreed to pay that amount.

If R.A.M. and Aquarina have not reached such an agreement, please answer the following questions.

Billing and Payment Information

2. Per Mr. Danny Mays's complaint letter to the Commission dated May 9, 2011, R.A.M. took over management of TILA pursuant to a 20-year lease that began on December 1, 2010. Please describe R.A.M.'s understanding regarding R.A.M.'s payment obligations for water and wastewater services provided to the entire golf course, including irrigation water, per its contract with the golf course owners. Please provide supporting documentation, if available.
3. There is conflicting information in the Commission's complaint records regarding when R.A.M. took over operation of TILA. Please clarify whether R.A.M. took over operation of TILA in November or December 2010.

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4. Please state with as much specificity as possible which months of water and wastewater service are included in R.A.M.'s billing dispute, and what amount is disputed for each month identified.
5. In Mr. Danny Mays's letter dated May 9, 2011, Mr. Mays states "The overcharges are easily \$20,000 over 5 months." Please provide additional information regarding R.A.M.'s calculation of the estimated overcharges.
6. In its May 30, 2011 complaint response to the Commission, Aquarina included Customer History Reports that provide a partial history of water and wastewater service billing to TILA through eight separate accounts. Please answer the following questions regarding TILA's billing history:
 - a. All eight accounts indicate that a wire transfer payment was posted on December 20, 2010. Did R.A.M. make the December 20, 2010 payments? If not, does R.A.M. have any knowledge of who made the payments and what billing period is represented by those payments?
 - b. The reports indicate that a (\$259,023.45) adjustment was made to the Golf Course Turf Account 707 on November 10, 2010 recorded as "former owner adjustment – clear bad debt." In addition, all eight accounts indicate that on February 3, 2011, the accounts were adjusted for negotiated adjustments for miscellaneous credit or water and for bad debt adjustments to clear bad debt. Does R.A.M. have any knowledge of these adjustments, such as why the adjustments were made and the billing period reflected by those adjustments? If so, please explain.
7. Please provide a list of all payments made by R.A.M. to Aquarina to date, specifying for which accounts the payments were made, for which period, and whether the payments were for disputed or undisputed bills.

Golf Course Meter and Meter Tests

8. Commission complaint records indicate that on June 2, 2011, Mr. Danny Mays informed a Commission staff member that the golf course irrigation system is computerized and measures water consumption. Documentation provided by R.A.M. includes a TILA Irrigation System Water Usage Summary that provides sprinkler head capacity information, but not exact usage on specific days.
 - a. Does R.A.M. have more specific water usage data from its irrigation system, such as a daily total of water actually used? If yes, please provide the detailed water usage reports for the entire time period in dispute.
 - b. If R.A.M. does not have specific water usage data, please provide information regarding the golf course's actual irrigation schedule during the time period in dispute, such as a schedule showing which sprinkler heads were run and for how long.

- c. Absent the information requested in questions 8(a) and 7(b) above, please provide an estimate of the total gallons of water that R.A.M. believes is used for golf course irrigation, broken down by each month in dispute. Please provide any supporting documentation used by R.A.M. to estimate the irrigation gallons.
9. Please describe the type of devices that measure water usage within the irrigation system and where these devices are located in relation to the utility's water meter.
10. Commission complaint records indicate that on June 2, 2011, Mr. Danny Mays informed a Commission staff member that corrosion in the pipe supplying water to the meter reduced the pipes capacity by 50 percent. Also on June 2, 2011, Mr. Tom DeShazo informed a Commission staff member that the reduced pipe capacity and 110 pounds per square inch (psi) caused a vortex, which caused the meter to over-record consumption. Please provide additional information or supporting documentation used by R.A.M. to make these determinations.
11. In Mr. Danny Mays's letter dated May 9, 2011, Mr. Mays states "We are aware that the fire system has numerous faults from a fire system inspection report we secured in January 2011." Please provide a copy of that report and any other information that R.A.M. is aware of regarding the fire system.
12. Commission complaint records indicate that on June 2, 2011, Mr. Tom DeShazo advised a Commission staff member that the problem of the over-recording of consumption was resolved when the corroded pipe supplying the meter was replaced on May 18, 2011. Please verify whether R.A.M. agrees with the accuracy of the meter readings since May 18, 2011, or whether this issue is still in dispute.
13. Mr. Tony Crocco's May 30, 2011 letter to Mr. Reginald Burge indicates that SysteMatic Services, Inc. tested the golf course water meter in May 2011 and found it to be within a 1.5 percent degree of accuracy. Also, Aquarina's May 30, 2011 complaint response to the Commission indicates that the meter was certified accurate and calibrated on May 25, 2011 by SysteMatic Services, Inc. Based upon these test results, have Aquarina and R.A.M. agreed that the meter is now accurately recording consumption since May 25, 2011? If not, why not?

Golf Course Water Needs

14. In Mr. Danny Mays's complaint letter dated May 9, 2011, Mr. Mays discusses the failure of the utility to provide adequate water to the golf course. Please provide additional information regarding the quantity of water needed by the golf course versus the quantity of water that has been provided by the utility. Please be specific with respect to daily water needs, variation of water needs from month-to-month, and variation of water needs for a golf course trying to improve versus maintain turf conditions.
15. Please explain how the location of the TILA golf course on a barrier island impacts the golf course's irrigation needs as compared to golf courses located further inland.
16. Please explain whether the age of a golf course and its irrigation system impact water needs.

17. Aquarina's May 30, 2011 complaint response to the Commission indicates that the golf course is allotted 230,000 of the 313,000 gallon per day withdrawal limit set by the Consumptive Use Permit (CUP) issued by the St. Johns County Water Management District. Please explain if R.A.M. is aware of the 230,000 gallon per day allotment to the golf course and whether this impacts the golf course's irrigation needs.
18. Has R.A.M. taken any actions to inspect the golf course irrigation lines for leaks that could potentially contribute to water loss within the irrigation system? If yes, please describe the results of the inspection, any subsequent repairs, and the date(s) of the inspection and/or repairs.
19. Please describe any repairs or adjustments that R.A.M. has made to the irrigation system since taking over management of the golf course not described in response to question 18 above.
20. Aquarina's May 30, 2011 complaint response to the Commission indicates that Aquarina is willing to install an air-relief valve at whatever point in the golf course system that R.A.M. feels would most benefit them. Has R.A.M. discussed this option with Aquarina? If yes, what was the result of that discussion?

Please file the original and five copies of the requested information by **Friday, July 8, 2011**, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6076 if you have any questions.

Sincerely,



Anna R. Norris
Senior Attorney
Office of the General Counsel

ARN/sh

cc: Office of Commission Clerk
Holly Burge, Aquarina Utilities, Inc.