

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water and)
wastewater rates in Alachua, Brevard, DeSoto,)
Hardee, Highlands, Lake, Lee, Marion, Orange,)
Palm Beach, Pasco, Polk, Putnam,)
Seminole, Sumter, Volusia, and Washington)
Counties by Aqua Utilities Florida, Inc.)
_____)

DOCKET NO. 100330-WS

Dated: November 3, 2011

SUPPLEMENTAL REBUTTAL TESTIMONY

OF

SUSAN CHAMBERS

on behalf of

Aqua Utilities Florida, Inc.

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1 AQUA UTILITIES FLORIDA, INC.

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5

6 **Q. What is the purpose of your supplemental rebuttal testimony?**

7 A. The Company has been given the opportunity to file supplemental testimony in
8 order to give the Commission and parties a report on AUF's efforts to address
9 customer comments raised at the customer service hearings that were held in 10
10 locations throughout the State.

11

12 **Q. Can you summarize AUF's approach to issues raised by customers at the**
13 **various service hearings?**

14 A. Yes. AUF's billing, customer service and operations teams thoroughly
15 investigated each customer issue. The vast majority of the customers who spoke
16 expressed concerns over the level of the rates that AUF is requesting in this
17 proceeding and did not speak on quality of service. Many customers spoke about
18 issues that have already been resolved prior to the service hearing, and other
19 customer issues were resolved on site at the hearings. Other customers were
20 contacted following the hearing in an attempt bring a final resolution to their
21 issues.

22

23

1 **Q. Is your supplemental rebuttal testimony focused on any particular area?**

2 A. Yes. I will be addressing and explaining billing-related issues raised by AUF's
3 customers at the customer service hearings. It is my understanding that Preston
4 Luitweiler will be providing supplemental testimony to address and explain
5 environmental and operational issues, and Troy Rendell will address and explain
6 rate making issues that were raised by customers.

7

8 **Greenacres Service Hearing**

9 **Q. At the service hearing in Greenacres Ms. Eleanor Cummings stated that she**
10 **did not receive a refund check related to a leak adjustment. Did AUF follow**
11 **up with Ms. Cummings on this issue?**

12 A. Yes. After the customer service meeting, the Company confirmed that Ms.
13 Cummings did receive a refund check. The Company contacted Ms. Cummings
14 and also had a field technician deliver a hard copy of the endorsed check to
15 eliminate any confusion on the matter.

16

17 **Sebring Service Hearing**

18 **Q. Were there any billing related issues raised during the Sebring customer**
19 **service hearing which AUF investigated?**

20 A. Yes. AUF's investigation shows that Ms. Mary Phillis Koloze experienced a
21 billing issue that was resolved over three years ago. More recently, Ms. Koloze
22 has contacted the Company about water usage levels. On March 31, 2011 AUF
23 tested her meter and it tested accurately. Our review also shows that the usage

1 and bill amounts appear normal based on the customer's historical consumption.
2 This customer specifically indicated that the Company's customer service
3 representative with whom she worked was very nice and very gracious. Ms.
4 Koloze also spoke at the Lakeland customer meeting.

5
6 Ms. Mattie Daniels questioned her water usage levels. After the hearing, AUF
7 representatives offered to visit with Ms. Daniels but she did not express a desire
8 for further follow up. It appears that Ms. Daniels was under the mistaken belief
9 that if there was a leak on an AUF main, her bill would go up. The Company has
10 reviewed her usage over the 12 months and her usage appears to be normal.

11

12 **Oviedo Service Hearing**

13 **Q. Were there any billing related issues raised at the Oviedo service hearing**
14 **which AUF subsequently investigated?**

15 A. Yes. Ms. Carol Lawrence discussed a number of issues, including a leak
16 adjustment. The Company's records indicate that Ms. Lawrence was provided
17 information on its leak adjustment policy. However, there are no records or
18 information which suggest that Ms. Lawrence has requested a leak adjustment, or
19 provided the necessary documentation. I have explained AUF's leak adjustment
20 policy in greater detail on page 25 of my rebuttal testimony.

21

22 Ms. Christen Castro discussed a bill that remains outstanding. Currently, Ms.
23 Castro is not an active customer of AUF and her outstanding balance has been

1 sent to collections. The Company has reviewed this account in detail over the past
2 several years and AUF representatives have personally met with Ms. Castro
3 several times to address her billing and water quality concerns. Ms. Castro filed a
4 formal complaint with the Commission on August 3, 2010 regarding a high bill
5 which she disputed. In response to the complaint, AUF reviewed the account and
6 determined that billing statements were issued on actual readings. A meter test
7 was also performed and the meter tested accurate. Total consumption was 29,200
8 gallons for the billing period in question -- July 19, 2010 to August 19, 2010. A
9 Company representative attempted to reach Ms. Castro on August 20, 2010 and
10 left a message. Ms. Castro returned the call on August 24, 2010 and she stated
11 that her pool is filled by a pump but did not elaborate if the pool had been filled or
12 refilled during the period in question. Ms. Castro stated that she has not used her
13 irrigations system; however she stated she was going to check with her husband.
14 The Commission closed the complaint on November 12, 2010.

15
16 In the fall of 2010, at the customer's request, an AUF representative again
17 reviewed this customer's usage and visited the property. The AUF representative
18 confirmed that the amount of water usage on her bill was correct. He did note,
19 and informed the customer, that one of the heads on her irrigation system was
20 leaking.

21
22 Company representatives again met with Ms. Castro to discuss her bill on May 4,
23 2011. The Company informed her that, as of the end of March 2011, the

1 customer had an outstanding water bill of \$1,259.33, since the customer had not
2 made a payment since last September 2010. The Company sent a letter to Ms.
3 Castro dated April 13, 2011 offering a leak adjustment that resulted in a reduction
4 of the customer's bill to \$1,050.80. The amount of the adjustment was calculated
5 by adjusting her usage to an average for the period of July through August 2010.

6

7 Mr. Jason Ream spoke about a billing issue that has been resolved well over two
8 years ago. The Company explained to both Mr. Ream and to Staff that his house
9 was built by Morrison Homes and the builder had applied for water service when
10 it built the homes. When the house was sold to the owner, the billing system was
11 only set up to bill for water service and not wastewater. The Company worked
12 with the customer and, as of April 2009, both water and wastewater charges were
13 corrected. Since that time, Mr. Reams' account has received actual reads and his
14 last bill for water and wastewater services was \$58.92

15

16 **Gainesville Service Hearing**

17 **Q. Did AUF look into any billing-related comments raised by customers at the**
18 **Gainesville service hearing?**

19 A. Yes. The Company reviewed the account of Mr. Clifton Pridgen in detail. Mr.
20 Pridgen's service had been disconnected after proper notice in July 2011 due to
21 his inability to maintain his payment arrangement. Although the customer
22 ultimately made a payment, it was made late and was not received in time to stop
23 the disconnect. Based on our review of the customer account, Mr. Pridgen had

1 been delayed in responding due to an unexpected issue with his car and was not
2 able to make the payment prior to the service being terminated. After service
3 was terminated, the customer made a payment and his service was restored but an
4 outstanding balance still remained on his account. AUF has further reviewed the
5 account and based on these specific circumstances, the Company has applied a
6 courtesy credit to his account. The Company posted a \$426.22 abatement on
7 September 26, 2011. The Company called the customer on September 13, 2011
8 to explain the issue but the call was not answered so the Company representative
9 left a message. AUF has subsequently called the customer and left messages on
10 two other occasions.

11
12 The Company has reviewed the account of Ms. Laura Denmark in detail. Ms.
13 Denmark moved to her present location from another trailer lot within the Park.
14 At the time of the move, she had a previous outstanding balance with AUF that
15 was transferred to her new account. Ms. Denmark moved into the new property
16 and called for service effective June 24, 2011. She is currently an active customer
17 with an outstanding balance. Her average usage ranges from 1,100 to 4,400
18 gallons per month. The Company has contacted Ms. Denmark to set her up on
19 payment arrangement, and has provided the customer with additional contact
20 information and phone numbers if she has further questions.

21
22 The Company has also reviewed the account of Ms. Nerilyn Evans. The customer
23 was not being charged wastewater service and thus was billed for the undercharge

1 for 12 months of service. The customers was given a payment arrangement and
2 subsequently defaulted on that payment arrangement in December 2010. In lieu of
3 disconnection, her payment arrangement was reset. The customer defaulted on
4 this second payment arrangement in March 2011. Again, in lieu of disconnection,
5 her payment arrangement was reset. The customer defaulted on this third payment
6 arrangement in July, 2011, at which time after proper notice the Company
7 disconnected service due to the default. Based on its review, the Company
8 believes the customer may not have clearly understood how to comply with the
9 payment arrangement. Following the customer service hearing, Company
10 representatives contacted Ms. Evans to re-establish a payment arrangement of
11 \$50.00 going forward and provide additional explanations.

12

13 The Company previously explained in detail Ms. Eugene Davis' account in
14 Exhibit A to AUF's Response to YES Companies, LLC D/B/A Arredondo Farms'
15 Memorandum in Opposition to Rate Increase Application. The Company's
16 actions with respect to this customer are also described in my affidavit filed
17 October 4, 2011.

18

19 The Company has reviewed Ms. Regina Lewis' account in detail and has
20 previously addressed Ms. Lewis' billing history in my affidavit filed on October
21 4, 2011.

22

1 The Company has reviewed the account of Ms. Joyce Helm in detail and has
2 previously addressed Ms. Helm's billing history in Exhibit A to Aqua Utilities
3 Florida, Inc.'s Response to YES Companies, LLC D/B/A Arredondo Farms'
4 Memorandum in Opposition to Rate Increase Application.

5
6 Mr. Earl McKeever expressed concern about water quality and about
7 consumption that took place at his property while he was away. A Company field
8 technician visited the property on September 15, 2011 and found no leaks or other
9 problems. The Company also provided a high consumption kit to the customer.

10 Upon review of this account, the customer averages approximately 5,000 gallons
11 a month with a range of approximately 3,700 gallons per month to approximately
12 5,200 per month. Mr. McKeever's July 2011 bill showed consumption at 4,700
13 gallons, his August 2011 bill showed consumption at 4,500 gallons, and his
14 September 2011 bill showed consumption at 4,000 gallons.

15
16 The Company has reviewed the account of Michelle Einmo in detail. This
17 customer had a billing issue that arose in 2007 and was already addressed in
18 AUF's last rate case in Docket No. 080121-WS. Since that time, the customer's
19 bills are correct. Ms. Einmo also expressed a concern about fluoride which is
20 addressed in Mr. Luitweiler's supplemental rebuttal testimony.

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1 **Charles Milton**

2 The customer filed a complaint on July 7, 2011 [1017444W] concerning water
3 service that had been disconnected after proper notice on September 16, 2010, due
4 to his failure to pay. The account then was designated as “inactive.” From
5 September 16, 2010 through July, 2011 there was consumption registering on the
6 meter but there was no active customer of record. Consequently, AUF turned off
7 and blocked the service with a lock. As Mr. Milton acknowledged during his
8 testimony, that the lock was taken off by an employee of YES. On July 11, 2011
9 a Company representative spoke with Mr. Milton and confirmed that the service
10 had been restored. At that time, Mr. Milton also confirmed that he was using the
11 service since the water was shut off on September 16, 2010. Therefore, AUF
12 issued Mr. Milton a bill for 298 days of service and he entered into a payment
13 arrangement for the service used during that time. A Company representative
14 spoke to Mr. Milton on October 19, 2011, and a new payment agreement was
15 established which lowered the monthly installment amount and extended the
16 agreement from 13 months to 25 months.

17

18 The Company has reviewed the account of Judy Donavin (William Wright)
19 in detail and has previously addressed Ms. Wright’s billing history Exhibit A to
20 Aqua Utilities Florida, Inc.’s Response to YES Companies, LLC d/b/a Arredondo
21 Farms’ Memorandum in Opposition to Rate Increase Application.

22

23

1 **Eustis Service Hearing**

2 **Q. Were there billing-related issues raised by customers at the Eustis service**
3 **hearing which AUF subsequently followed up on?**

4 A. Yes. Ms. June Longnecker, who is a resident of Scottish Highlands, testified at
5 the meeting and provided AUF with bills from four customers. The Company
6 contacted Ms. Longnecker after the service hearing and assured her that the
7 Company would review the accounts that she mentioned at the customer service
8 meetings. I've summarized the Company's review of the four accounts:

9 **1) Joseph Solien**

10 As promised, the Company contacted this customer to discuss his payment
11 arrangement and he appeared to understand the basis for and the term of the
12 payment arrangement.

13 **2) Joyce Watkins**

14 Review of Ms. Watkins' account shows that she uses a high volume of water
15 services. This customer's usage averages approximately 25,000 gallons per
16 month. After the customer meeting, the Company tested Ms. Watkins' meter and
17 it was found to be accurate. The field technician noted that this customer has
18 high usage due to heavy irrigation. The Company contacted Ms. Watkins to
19 address her concerns and discuss the results of the service order. To date, the
20 Company has left several messages for the customer which have not been
21 returned.

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1 **3) Carol Clendinen**

2 Ms. Clendinen had previously complained about a high bill in June 2011. The
3 Company made a field visit to check for leaks and to verify the read on June 30,
4 2011. The Company's field notes from that visit indicate that the customer had
5 installed new sod at the property during the month in question, i.e., June 2011.
6 The Company made a subsequent field visit on July 20, 2011 to test the meter.
7 The meter tested as accurate. The customer's usage in June of 2011 was 72,000
8 gallons. Subsequent bills show consumption in July at 7,300 gallons, in August at
9 8,700 gallons, in September at 8300 gallons, and in October at 5,700 gallons.
10 Following the customer service hearing, the Company spoke with Mr. Clendinen
11 who advised that there are no further issues at this time.

12 **4) Esther Pierce**

13 The customer called about a high bill on July 26, 2011. The Company made a
14 field visit on July 29, 2011 to check for leaks and to verify the read. No problems
15 were detected. Field notes made at that time indicated that this could be possibly
16 an irrigation issue. The Company made a subsequent field visit on September 28,
17 2011 to test the meter, which tested accurate. Ms. Pierce's last three bills show
18 consumption in August at 3,000 gallons, September at 2,700 gallons and October
19 at 2,500 gallons.

20
21 The Company also investigated the comments made by David Storch. As a result
22 of the zero consumption read, Mr. Storch received but did not pay for water
23 through his irrigation meter for approximately twenty months. As Mr. Storch

1 stated at the hearing, he uses large volumes of water for irrigation
2 (20,000/month). Mr. Dortch was billed for 12 months of service even though he
3 received approximately 20 months of water at no charge. Mr. Storch is current on
4 his account and has made no calls to the Company since November of 2009.

5
6 **Lakeland Service Hearing**

7 **Q. Where there any billing-related issues raised at the Lakeland service hearing**
8 **that AUF followed up on?**

9 A. Yes. The Company reviewed the account of Clint Going who expressed concern
10 about a bill that covered 34 days of service. The Company confirmed that Mr.
11 Going did receive a bill which had 34 days of service included in the monthly
12 charge. However, upon review of this bill, it shows the volumetric charges were
13 all included in the Tier 1 consumption block. A review of the bill confirmed that
14 the customer was not charged at a higher tiered rate due to the 34 days of service
15 bill.

16
17 The Company has also reviewed the account of Ms. Linda Gadd. This customer
18 has filed three complaints with the Commission in the last 6 months. In July, 2011
19 she complained about being disconnected for non-payment. The July
20 Commission complaint has been closed without any finding of apparent violation.
21 On September 13, 2011, she complained she was entitled to a credit due to a
22 water outage that lasted from 3:00 a.m. to 11:00 a.m. on September 12, 2011. On
23 October 17, 2011, she complained about a high bill. The Company has made a

1 series of field visits to check Ms. Gadd's meter and check for leaks. In each
2 instance the meter has tested as accurate, and no leaks have been detected. To
3 further address Ms. Gadd's concerns, the Company has coordinated with
4 Commission Staff to have a Staff member present when the meter was tested on
5 November 2, 2011.

6

7 The Company has reviewed the account of Mr. Dennis Leonis who expressed
8 concern about customer service representative demeanor. The Company reviewed
9 the calls coming in to the call center regarding this account. Based on our review
10 of the calls, the Company believes the customer service representative handled the
11 call in a professional and courteous manner. On September 14, 2011, Mr. Leonis
12 sent an email to the Company stating the particular customer service
13 representative that contacted him on September 13, 2001 was very nice on the
14 phone.

15

16 Our investigation of Mr. Gordon Mehrman's account shows that he was billed for
17 an undercharged due to a zero consumption read. The bill for the undercharge
18 was properly issued for 12 months of service.

19

20 Ms. Peggy Mounts questioned the fact that she received two bills for the same
21 amount. Our investigation shows that her usage was actually the same for both
22 May and June 2011. Since then, her usage has differed, but only slightly.

23

1 Our records show that Ms. Theresa Robinson has had a 1 inch meter since she
2 moved into her home in 2004. In April of 2011, Ms. Robinson requested that her
3 meter be downsized from a 1 inch meter to a 5/8 inch meter. The Company
4 complied with her request and, consistent with its policy, did not charge her for
5 the downsize. Company representatives spoke with Ms. Robinson at the service
6 hearing and confirmed that her meter measured 5/8 x 3/4 inches, which is the
7 smallest size available for customers.

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9 **Q. Does this conclude your testimony?**

10 **A. Yes.**

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