

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: April 5, 2013
TO: Ann Cole, Commission Clerk, Office of Commission Clerk
FROM: Cindy B. Miller, Senior Attorney, Office of the General Counsel *CM*
RE: Docket No. 120246-WS, Revision to Rule 25-30.335, Customer Billing, Revision to Rule 25-30.350, Backbilling, Adoption of Rule 25-30.351, Unauthorized Use, F.A.C.

RECEIVED-FPSC
13 APR -5 PM 12:02
COMMISSION
CLERK

Please place the attached correspondence in the docket file.

CBM:tf
Attachment

DOCUMENT NUMBER-DATE
01710 APR-5 2013
FPSC-COMMISSION CLERK

Cindy Miller

From: Mike Smallridge <utilityconsultant@yahoo.com>
Sent: Tuesday, February 26, 2013 4:49 PM
To: Cindy Miller
Subject: response to docket#120246WS

Dear Ms. Miller,

Please add my comments to the docket .

1. Page 4 line 7. This may be problematic for some of my fellow utility owners if there billing program doesn't allow " estimated" to be printed on the actual invoices. Some may have to write or stamp on the invoice to comply with the rule.

2. Page 2 line 14-17. " after any second estimated Bill in a 12 month period." my concern about this for example if I send a estimated bill in February I wont remember to provide a written explanation if I have to send them a estimated bill in November. Please consider revising the language to " after a second **consecutive** estimated bill.

3. Page 4 18-20. My billing program allows me to do this, but my fellow class c utility owners may struggle with this

4. Page 7 line 15-20. This should be made easier to read. I would submit as follows.

(2) in the event of an over billing, the utility shall refund the overage to the customer. The customer may elect to receive the refund as a credit to future billings, or as a one time payment. If the commencement date of the over billing cannot be determined, then an estimate of the over billing shall be made be based on the customers past consumption **or if a new customer, the two months average bill of the utility.**

5. Page 7 Line 20. The statement of " or as a one time payment" gives me some serious heartburn. I would choose to delete this altogether, simply because if the customer chooses to get a one time payment, I may have to spend money on such things as stamps , staff time to print the check, envelopes, paper etc. it may cost me more to issue the check than the amount of the check.

If you must keep this, I would suggest putting a dollar limit to it, so that it doesn't cost the utility money to issue a \$5.00 check to a customer when that small amount could be placed in the customer account and credited to the next month invoice.

6. Page 8 line 2-4. This is a little unclear to me. Some tariff sheets have Meter tampering fees. Does this paragraph mean I can charge "based on the customer past consumption" **and** a meter tampering fee? Also, what do you do if the customer has no history? Can we add, " based on the customer's past consumption or if a new customer the average two months bill for the utility"?

I hope this helps.

Mike Smallridge