

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: February 23, 2017

TO: Office of Commission Clerk (Stauffer)

FROM: Division of Economics (Johnson, Hudson) *ST PD GS*
Division of Accounting and Finance (Golden, Wilson) *msj*
Office of the General Counsel (Lherisson) *BL matt for ky*

RE: Docket No. 160145-WU – Application for limited revenue proceeding in St. Johns County, by Camachee Island Company, Inc. d/b/a Camachee Cove Yacht Harbor Utility.

AGENDA: 03/07/17 – Regular Agenda – Proposed Agency Action – Except Issue Nos. 2 and 3 – Interested Persons May Participate

COMMISSIONERS ASSIGNED: All Commissioners

PREHEARING OFFICER: Graham

CRITICAL DATES: None

SPECIAL INSTRUCTIONS: None

RECEIVED-FPSC
2017 FEB 23 AM 11:33
COMMISSION
CLERK

Case Background

Camachee Island Company, Inc. d/b/a Camachee Cove Yacht Harbor Utility (Camachee or utility) is a Class C utility providing service to approximately 100 water customers in St. Johns County. The utility began operations in 1977. Camachee was granted an original certificate to operate a water utility in St. Johns County in 1988, subsequent to the county turning jurisdiction over to the Commission. The county rescinded Commission jurisdiction in 1989. On January 16, 2009, St. Johns County returned jurisdiction to the Commission. The utility applied for a

grandfather certificate on April 13, 2009, and a staff-assisted rate case (SARC) on April 24, 2009. The utility's rates and charges were last approved in a staff-assisted rate case in 2010.¹

On June 7, 2016, Camachee filed its application for a limited proceeding pursuant to Section 367.0822, Florida Statutes (F.S.). A reduction in water usage has led to the utility being unable to achieve its previously approved revenues with the utility's current rates. Unlike a full rate case, Camachee's request consists of only the recovery of the revenue requirement authorized by the Commission in Docket No. 090230-WU, plus the price index increases authorized since that time, rate case expense incurred in this proceeding, and regulatory assessment fees (RAFs). The utility is seeking to recover no new items of expense, investment, or changes to cost of capital. Staff believes that Camachee has met the filing requirements of Rule 25-30.445, Florida Administrative Code (F.A.C.).

A customer meeting was held October 17, 2016, in the service of area of the utility in St. Augustine and twelve customers attended the meeting. The main concerns brought to staff's attention were that the reduction in water usage might have occurred solely because of a lack of yachts in the marina during the recession, as well as the overall amount of the requested increase. In addition, customers provided written comments expressing that the Commission order the utility to file a SARC, so that a full investigation of Camachee's financials and operations can take place. In addition, on January 25, 2017, the Office of Public Counsel (OPC) requested that the utility file for a SARC in lieu of a limited proceeding. By letter dated February 20, 2017, the utility confirmed its interest in maintaining the request for a limited proceeding.

This recommendation addresses the utility's filing for a limited proceeding rate increase and whether the Commission should grant it. The Commission has jurisdiction to consider this matter pursuant to Sections 367.0822 and 367.0816, F.S.

¹Order No. PSC-10-0126-PAA-WU, issued March 3, 2010, in Docket No. 090230-WU, *In re: Application for staff-assisted rate case in St. Johns County by Camachee Island Company, Inc. d/b/a Camachee Cove Yacht Harbor Utility.*

Discussion of Issues

Issue 1: Should the Commission approve the utility's request for a limited proceeding?

Recommendation: The Commission should approve the utility's request for a limited proceeding rate increase. Camachee should be allowed an annual increase of \$38,196 (43.31 percent), resulting in an adjusted revenue requirement of \$126,395. The adjusted revenue requirement is reflected on Schedule No. 1-A. The appropriate monthly water rates are shown on Schedule No. 2. The utility should file revised tariff sheets and a proposed customer notice to reflect the Commission-approved rates. The approved rates should be effective for service rendered on or after the stamped approval date on the tariff sheet pursuant to Rule 25-30.475(1), F.A.C. In addition, the approved rates should not be implemented until staff has approved the proposed customer notice and the notice has been received by the customers. The utility should provide proof of the date notice was given within 10 days of the date of the notice. (Johnson, Golden)

Staff Analysis: Limited proceedings generally address a specific or significant change that would adversely affect the normal operating income of the utility and are usually narrow in scope.² Staff believes that Camachee's case as filed is sufficiently narrow in scope to qualify for a limited proceeding. Staff also believes that Camachee has met all the minimum filing requirements as set forth in Rule 25-30.445, F.A.C. In the past, the Commission has approved limited proceeding rate increases for a utility that experienced a significant reduction in usage.³

Billing Determinants and Test year Revenues

In its application, Camachee stated that the average annual usage from 2009 through 2015 was 7,505,000 gallons, which is considerably less than the 9,142,000 gallons used in the utility's 2009 SARC. Staff reviewed monthly billing determinants for both 2015 and 2016 and found the gallons to be significantly lower than the gallons used in establishing rates in Camachee's 2009 SARC. Staff relied on billing determinants from 2016 to most accurately represent the current usage of Camachee's customer base. The customer demand was 6,632,340 gallons in 2015 and 7,558,533 gallons in 2016. Staff found that both the residential and commercial customers of the utility had a comparable decrease in usage since the utility's last rate case, indicating that the reduction in demand was not associated exclusively with the marina.

The utility's requested percentage increase was based on revenues of \$78,173, which are the 2015 billing determinants annualized with a price index rate adjustment that became effective June of 2016. As mentioned previously, the customer demand increased from 2015 to 2016. Therefore, in order to determine the appropriate percentage increase, staff believes that 2016 billing determinants should be used to determine the test year revenues. As a result, staff annualized revenues for 2016, which resulted in revenues of \$88,199.

²Order No. PSC-13-0647-PAA-WU, issued December 5, 2013, in Docket No. 130155-WU, *In re: Application for limited proceeding increase in rates in Escambia county by Peoples Water Service Company of Florida, Inc.*

³Id.; See also Order No. PSC-16-0297-PAA-GU, issued July 27, 2016, in Docket No. 160033-GU, *In re: Petition for limited proceeding to restructure rates by St. Joe Natural Gas Company, Inc.*

Revenue Requirement

In its application, the utility proposed a revenue requirement of \$130,003, comprised of the \$114,439 revenue requirement that was authorized in the utility's last staff-assisted rate case by Order No. PSC-10-0126-PAA-WU⁴ (2009 SARC), plus an estimated \$15,564 for the total price index and pass through adjustments that the Commission approved for Camachee for 2010 through 2016. In addition, Camachee requested approval to recover the rate case expense and regulatory assessment fees (RAFs) related to the limited proceeding. The utility did not request any other changes to the operating expenses, cost of capital, or rate base established in its 2009 SARC. Consequently, staff used the revenue requirement, operating expenses, cost of capital, and rate base that were approved by the Commission in the 2009 SARC as the starting point for calculating the adjusted revenue requirement for this limited proceeding.

In its January 25, 2017 letter, OPC objected to Camachee's estimated \$15,564 total price index and pass through revenue increase, and proposed that it would be more appropriate to use the actual revenue increases approved by the Commission. Staff notes that the utility's proposal is consistent with the methodology previously used in a similar limited proceeding approved by the Commission.⁵ However, in the instant case, this method results in an overstatement of the utility's price index and pass through revenue increases when compared to the actual approved price index and pass through revenue increases.

The utility's estimate of \$15,564 was calculated by applying a combined percentage increase for the 2010 through 2016 price index and pass through adjustments to the total revenue requirement approved in the utility's 2009 SARC. However, because Camachee's actual annual revenues have been consistently lower than the approved revenue requirement, the actual revenue increases that resulted from the price index and pass through adjustments were also lower than would have resulted if the utility's revenues had more closely matched the revenue requirement authorized in the 2009 SARC. Specifically, Camachee's actual revenues subsequent to the 2009 SARC have only ranged from \$73,586 to \$84,346, representing approximately 64 percent to 74 percent of the \$114,439 authorized revenue requirement. Based on the utility's actual revenues, the combined actual price index and pass through revenue increases that were approved for Camachee from 2010 through 2016 equal \$10,867, which is \$4,697 less than the utility's estimate. Due to the significant difference between the estimated and actual price index and pass through revenue increases, staff agrees with OPC that it would be more appropriate to use the actual revenue increases of \$10,867 in this case. Consequently, staff has increased the utility's 2009 approved operating expenses by a total of \$10,867 to reflect the operating expense increases that were associated with the price index and pass through adjustments approved from 2010 through 2016. The specific adjustment is broken down between a \$10,377 increase to operation and maintenance expenses and the associated \$490 increase to RAFs for a total adjustment of \$10,867.

Also, the utility is required by Rule 25-30.446, F.A.C., to provide notices of the customer meeting and notices of final rates in this case to its customers. For noticing, staff estimated \$93

⁴Order No. PSC-10-0126-PAA-WU, issued March 3, 2010, in Docket No. 090230-WU, *In re: Application for staff-assisted rate case in St. Johns County by Camachee Island Company, Inc. d/b/a Camachee Cove Yacht Harbor Utility.*

⁵Id.

for postage expense, \$67 for printing expense, and \$9 for envelopes. This results in \$169 for the noticing requirement. The utility paid a \$500 limited proceeding filing fee. The utility also provided documentation to support \$5,280 for accounting services related to this filing. Pursuant to Section 367.0816, F.S., rate case expense is amortized over a four-year period.⁶ Based on the above, staff recommends total rate case expense of \$5,949 ($\$169 + \$500 + \$5,280$), which amortized over four years is \$1,487.

In addition, the operating expenses approved in the 2009 SARC included annual amortized rate case expense of \$1,020 to recover the rate case expense associated with the 2009 SARC. That rate case expense became fully amortized in 2014 and the utility's rates were reduced. However, because staff used the operating expenses approved in the 2009 SARC as the starting point in the instant case, an additional adjustment to remove the previously approved 2009 SARC rate case expense from the operating expenses used in staff's calculations is necessary. Therefore, staff decreased regulatory commission expense by \$1,020. Based on the above, staff's total adjustment to reflect the addition of rate case expense for the instant docket and removal of the 2009 SARC rate case expense is an increase of \$467 ($\$1,487 - \$1,020 = \467). Therefore, staff recommends regulatory commission expense of \$467.

The Commission approved RAFs of \$5,065 in Camachee's 2009 SARC. Based on staff's recommended test year revenues of \$88,199, the utility's RAFs should be \$3,969. Therefore, staff decreased RAFs by \$1,096 to reflect the appropriate test year RAFs. As discussed above, staff also increased operating expenses by \$490 to reflect the RAFs associated with Camachee's previously approved price index and pass through revenue increases, resulting in a net decrease to Taxes Other Than Income (TOTI) of \$607. In addition, staff increased RAFs by \$1,719 to reflect RAFs of 4.5 percent of the change in revenues resulting from the limited proceeding increase.

Based on the above, the appropriate revenue requirement for this limited proceeding is \$126,395, which is an annual increase of \$38,196 (43.31 percent) over the test year revenues. The adjusted revenue requirement of \$126,395 will allow the utility the opportunity to recover its expenses as approved in the 2009 SARC, the expense increases approved in the 2010 through 2016 price index and pass through adjustments, rate case expense associated with the instant case, and the associated RAFs. The adjusted operating expenses and revenue requirement are shown on Schedule No. 1-A, and the adjustments are shown on Schedule No. 1-B.

The adjusted revenue requirement was designed to maintain the 9.67 percent overall rate of return that was authorized in the 2009 SARC when compared to the 2009 approved operating expenses, adjusted only as discussed above, and the 2009 approved water rate base. However, Camachee's 2015 Annual Report indicates that the utility has experienced an increase in its operating expenses and a decrease in its rate base since the 2009 SARC.

For comparison purposes, the last column on Schedule No. 1-A shows an estimate of the operating loss and overall rate of return that the utility is more likely to achieve based on its more recent operating expenses and rate base using the adjusted revenue requirement of \$126,395.

⁶Section 367.0816, F.S., was repealed effective July 1, 2016, pursuant to HB 491, but still applies in this case because it was in effect when the application was filed on June 10, 2016.

Again, for comparison purposes only, staff increased the utility's 2015 operation and maintenance expenses of \$101,152 by \$1,487 to reflect the annual rate case expense associated with this limited proceeding for an adjusted operation and maintenance expense of \$102,639. The utility's 2015 operation and maintenance expenses did not include any rate case expense from the 2009 SARC because it became fully amortized in 2014, therefore, the additional adjustment to remove the prior rate case expense was not necessary for this comparison. Staff also increased Camachee's 2015 TOTI by \$1,719 to reflect the additional RAFs associated with the limited proceeding revenue increase. The comparison shows that Camachee would experience an estimated operating loss of \$1,877 and a negative rate of return of 0.59 percent.

Rates

Staff recommends that the percentage increase of 43.31 percent be applied as an across-the-board increase to existing service rates. The private fire protection rates should be one-twelfth of the approved base facility charge pursuant to Rule 25-30.465, F.A.C. The recommended monthly rates are shown on Schedule No. 2.

Conclusion

The Commission should approve the utility's request for a limited proceeding rate increase. Camachee should be allowed an annual increase of \$38,196 (43.31 percent), resulting in an adjusted revenue requirement of \$126,395. The adjusted revenue requirement is reflected on Schedule No. 1-A. The appropriate monthly water rates are shown on Schedule No. 2. The utility should file revised tariff sheets and a proposed customer notice to reflect the Commission-approved rates. The approved rates should be effective for service rendered on or after the stamped approval date on the tariff sheet pursuant to Rule 25-30.475(1), F.A.C. In addition, the approved rates should not be implemented until staff has approved the proposed customer notice and the notice has been received by the customers. The utility should provide proof of the date notice was given within 10 days of the date of the notice.

Issue 2: What is the appropriate amount by which rates should be reduced four years after the published effective date to reflect the removal of the amortized rate case expense as required by Section 367.0816, F.S?

Recommendation: The water rates should be reduced as shown on Schedule No. 2, to remove rate case expense grossed-up for RAFs and amortized over a four-year period. The decrease in rates should become effective immediately following the expiration of the four-year rate case expense recovery period, pursuant to Section 367.0816, F.S. The utility should be required to file revised tariffs and a proposed customer notice setting forth the lower rates and the reason for the reduction no later than one month prior to the actual date of the required rate reduction. If Camachee files this reduction in conjunction with a price index or pass-through rate adjustment, separate data should be filed for the price index and/or pass-through increase or decrease and the reduction in the rates due to the amortized rate case expense. (Johnson, Golden)

Staff Analysis: Section 367.0816, F.S., requires that the rates be reduced immediately following the expiration of the four-year period by the amount of the rate case expense previously included in the rates. The reduction will reflect the removal of revenues associated with the amortization of rate case expense, the associated return on working capital, and the gross-up for RAFs which is \$1,576, which will result in the rate decrease shown on Schedule No. 2.

Camachee should be required to file revised tariff sheets no later than one month prior to the actual date of the required rate reduction. The utility also should be required to file a proposed customer notice setting forth the lower rates and the reason for the reduction. If Camachee Cove files this reduction in conjunction with a price index or pass-through rate adjustment, separate data should be filed for the price index and/or pass-through increase or decrease and the reduction in the rates due to the amortized rate case expense.

Issue 3: Should the recommended rates be approved for Camachee on a temporary basis, subject to refund, in the event of a protest filed by a substantially affected person or party?

Recommendation: Yes. The recommended rates should be approved for the utility on a temporary basis, subject to refund, in the event of a protest filed by a substantially affected person or party. The utility should file revised tariff sheets and a proposed customer notice to reflect the Commission-approved rates. The approved rates should be effective for service rendered on or after the stamped approval date on the tariff sheet, pursuant to Rule 25-30.475(1), F.A.C. In addition, the temporary rates should not be implemented until staff has approved the proposed notice, and the notice has been received by the customers. Prior to implementation of any temporary rates, the utility should provide appropriate security. If the recommended rates are approved on a temporary basis, the rates collected by the utility should be subject to the refund provisions discussed below in the staff analysis. In addition, after the increased rates are in effect, pursuant to Rule 25-30.360(6), F.A.C., the utility should file reports with the Commission Clerk's office no later than the 20th of every month indicating the monthly and total amount of money subject to refund at the end of the preceding month. The report filed should also indicate the status of the security being used to guarantee repayment of any potential refund. (Golden, Wilson)

Staff Analysis: This recommendation proposes an increase in rates. A timely protest might delay what may be a justified rate increase resulting in an unrecoverable loss of revenue to the utility. Therefore, in the event of a protest filed by a substantially affected person or party, staff recommends that the recommended rates be approved as temporary rates. The utility should file revised tariff sheets and a proposed customer notice to reflect the Commission-approved rates. The approved rates should be effective for service rendered on or after the stamped approval date on the tariff sheet, pursuant to Rule 25-30.475(1), F.A.C. In addition, the temporary rates should not be implemented until staff has approved the proposed notice, and the notice has been received by the customers. The recommended rates collected by the utility should be subject to the refund provisions discussed below.

The utility should be authorized to collect the temporary rates upon staff's approval of an appropriate security for the potential refund and the proposed customer notice. Security should be in the form of a bond or letter of credit in the amount of \$25,569. Alternatively, the utility could establish an escrow agreement with an independent financial institution.

If the utility chooses a bond as security, the bond should contain wording to the effect that it will be terminated only under the following conditions:

1. The Commission approves the rate increase; or,
2. If the Commission denies the increase, the utility shall refund the amount collected that is attributable to the increase.

If the utility chooses a letter of credit as a security, it should contain the following conditions:

1. The letter of credit is irrevocable for the period it is in effect.
2. The letter of credit will be in effect until a final Commission order is rendered, either approving or denying the rate increase.

If security is provided through an escrow agreement, the following conditions should be part of the agreement:

1. The Commission Clerk, or his or her designee, must be a signatory to the escrow agreement.
2. No monies in the escrow account may be withdrawn by the utility without the prior written authorization of the Commission Clerk, or his or her designee.
3. The escrow account shall be an interest bearing account.
4. If a refund to the customers is required, all interest earned by the escrow account shall be distributed to the customers.
5. If a refund to the customers is not required, the interest earned by the escrow account shall revert to the utility.
6. All information on the escrow account shall be available from the holder of the escrow account to a Commission representative at all times.
7. The amount of revenue subject to refund shall be deposited in the escrow account within seven days of receipt.
8. This escrow account is established by the direction of the Florida Public Service Commission for the purpose(s) set forth in its order requiring such account. Pursuant to *Cosentino v. Elson*, 263 So. 2d 253 (Fla. 3d DCA 1972), escrow accounts are not subject to garnishments.
9. The account must specify by whom and on whose behalf such monies were paid.

In no instance should the maintenance and administrative costs associated with the refund be borne by the customers. These costs are the responsibility of, and should be borne by, the utility. Irrespective of the form of security chosen by the utility, an account of all monies received as a result of the rate increase should be maintained by the utility. If a refund is ultimately required, it should be paid with interest calculated pursuant to Rule 25-30.360(4), F.A.C.

The utility should maintain a record of the amount of the bond, and the amount of revenues that are subject to refund. In addition, after the increased rates are in effect, pursuant to Rule 25-30.360(6), F.A.C., the utility should file reports with the Commission Clerk's office no later than the 20th of every month indicating the monthly and total amount of money subject to refund at the end of the preceding month. The report filed should also indicate the status of the security being used to guarantee repayment of any potential refund.

Issue 4: Should this docket be closed?

Recommendation: No. If no person whose substantial interests are affected by the proposed agency action files a protest within twenty-one days of the issuance of the order, a consummating order will be issued. The docket should remain open for staff's verification that the revised tariff sheets and customer notice have been filed by the utility and approved by staff. When the tariff and notice actions are complete, this docket may be closed administratively. (Lherisson)

Staff Analysis: If no person whose substantial interests are affected by the proposed agency action files a protest within twenty-one days of the issuance of the order, a consummating order will be issued. The docket should remain open for staff's verification that the revised tariff sheets and customer notice have been filed by the utility and approved by staff. When the tariff and notice actions are complete, this docket may be closed administratively.

CAMACHEE COVE YACHT HARBOR UTILITY TEST YEAR ENDED 12/31/2015 SCHEDULE OF WATER OPERATING INCOME			SCHEDULE NO. 1-A DOCKET NO. 160145-WU			
	APPROVED IN 2009 SARC	STAFF ADJUSTMENTS	STAFF ADJUSTED TEST YEAR	ADJUST. FOR INCREASE	RECOMMENDED REVENUE REQUIREMENT	COMPARED TO ADJUSTED 2015
1. OPERATING REVENUES	<u>\$114,439</u>	<u>(\$26,240)</u>	<u>\$88,199</u>	<u>\$38,196</u> 43.31%	<u>\$126,395</u>	<u>\$126,395</u>
OPERATING EXPENSES:						
2. OPERATION & MAINTENANCE	\$61,400	\$10,845	\$72,245	\$0	\$72,245	\$102,639
3. DEPRECIATION (NET)	12,881	0	12,881	0	12,881	\$17,633
5. TAXES OTHER THAN INCOME	6,096	(607)	5,489	1,719	7,208	\$8,000
6. INCOME TAXES	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>\$0</u>
7. TOTAL OPERATING EXPENSES	<u>\$80,377</u>	<u>\$10,238</u>	<u>\$90,615</u>	<u>\$1,719</u>	<u>\$92,334</u>	<u>\$128,272</u>
8. OPERATING INCOME/(LOSS)	<u>\$34,062</u>		<u>(\$2,416)</u>		<u>\$34,061</u>	<u>(\$1,877)</u>
9. WATER RATE BASE	<u>\$352,235</u>		<u>\$352,235</u>		<u>\$352,235</u>	<u>\$318,612</u>
10. RATE OF RETURN	<u>9.67%</u>		<u>(0.69%)</u>		<u>9.67%</u>	<u>(0.59%)</u>

CAMACHEE COVE YACHT HARBOR UTILITY		SCHEDULE NO. 1-B
TEST YEAR ENDED 12/31/2015		DOCKET NO. 160145-WU
ADJUSTMENTS TO OPERATING INCOME		
		<u>WATER</u>
OPERATING REVENUES		
To adjust approved revenue requirement to reflect 2016 revenues.		<u>(\$26,240)</u>
OPERATION AND MAINTENANCE EXPENSES		
1. Limited Proceeding Adjustment		
To reflect total 2010-2016 index and pass through O&M expense increases		<u>\$10,377</u>
2. Regulatory Commission Expense (665)		
a. To reflect 4-year amortization of rate case expense (\$5,949/4).		\$1,487
b. To reflect removal of rate case expense from 2009 SARC.		<u>(1,020)</u>
Subtotal		<u>\$467</u>
TOTAL OPERATION & MAINTENANCE ADJUSTMENTS		<u>\$10,845</u>
TAXES OTHER THAN INCOME		
1. To reflect RAF increase associated with 2010-2016 index and pass through increases.		\$490
2. To reflect the appropriate test year RAFs.		<u>(1,096)</u>
Total		<u>(\$607)</u>

CAMACHEE COVE YACHT HARBOR UTILITY				SCHEDULE NO. 2
MONTHLY WATER RATES				DOCKET NO. 160145-WU
	UTILITY CURRENT RATES	UTILITY PROPOSED RATES	STAFF RECOMMENDED RATES	FOUR YEAR RATE REDUCTION
<u>Residential and General Service</u>				
Base Facility Charge by Meter Size				
5/8"X3/4"	\$13.91	\$23.13	\$19.93	\$0.25
3/4"	\$20.84	\$34.66	\$29.90	\$0.37
1"	\$34.75	\$57.79	\$49.83	\$0.62
1-1/2"	\$69.49	\$115.56	\$99.65	\$1.25
2"	\$111.21	\$184.94	\$159.44	\$1.99
3"	\$222.41	\$369.87	\$318.88	\$3.99
4"	\$347.48	\$577.86	\$498.25	\$6.23
6"	\$694.99	\$1,155.77	\$996.50	\$12.46
Flat Rate	\$71.43	\$118.79	\$102.37	\$1.28
Charge per 1,000 gallons - Residential				
0 - 3,000 gallons	\$2.26	\$3.76	\$3.24	\$0.04
3,001 - 6,000 gallons	\$6.75	\$11.23	\$9.67	\$0.12
6,001 - 12,000 gallons	\$10.14	\$16.86	\$14.53	\$0.18
Over 12,000 gallons	\$13.51	\$22.47	\$19.36	\$0.24
Charge per 1,000 gallons - General Service	\$9.04	\$15.03	\$12.96	\$0.16
<u>Typical Residential 5/8" x 3/4" Meter Bill Comparison</u>				
3,000 Gallons	\$20.69	\$34.41	\$29.65	
5,000 Gallons	\$34.19	\$56.87	\$48.99	
8,000 Gallons	\$61.22	\$101.82	\$87.72	