

Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A.
420 South Orange Avenue, Suite 700
P.O. Box 2346 (ZIP 32802-2346)
Orlando, FL 32801

(407) 841-1200
(407) 423-1831 Fax
www.deanmead.com

Attorneys and Counselors at Law
Orlando
Fort Pierce
Tallahassee
Viera/Melbourne
Vero Beach
Stuart (By Appointment)

MARTIN FRIEDMAN
407-310-2077
mfriedman@deanmead.com

June 14, 2022
via efilng

Adam Teitzman, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 20200185-WS - Application for certificates to provide water and wastewater service in Lake and Sumter Counties, by Gibson Place Utility Company, LLC.

Dear Mr. Tietzman:

On behalf of Gibson Place Utility Company, LLC (“Utility”) this letter is the response to Staff’s Second Data Request dated May 23, 2022.

1. In Schedule 9, GPU provided support in determination of the bulk service rate for Middleton Utility. Adjustments were made to the distribution and collection accounts to reflect plant not associated to Middleton Utility. Those adjustments did not account for the entirety of the distribution and collection accounts, which would indicate a portion of the distribution and collection lines are attributable to Middleton Utility. Therefore, please explain why the total amount of the distribution and collection costs were used to design the main extension charge, but the equivalent residential connections for Middleton Utility were not contemplated in the calculation.

RESPONSE: No distribution and collection lines were allocated to Middleton Utility in the determination of the bulk rates, only transmission lines. Middleton Utility customers are subject to a CIAC fee for their own distribution system, and it was determined that an additional fee from Gibson Place Utility would be excessive. Therefore, the Middleton Utility equivalent residential connections were not included in the calculation. Please note that the resulting calculation to Gibson Place Utility retail customers related to transmission and distribution is below the maximum allowed.

2. Please explain in detail why Middleton Utility, as a customer, would not be subject to paying a main extension charge.

RESPONSE: In its request, the Utility determined that the Middleton Utility customers should only pay for the fees associated with their own lines. At a maximum, if Middleton Utility customers were to be charged the Gibson Place Utility transmission and distribution CIAC, it should only be that portion associated with transmission lines.

3. The Utility requested initial, normal, violation, and premises visit charges. Rule 25-30.460, Florida Administrative Code (F.A.C.), was recently amended to remove initial connection and normal reconnection charges. Pursuant to Rule 25-30.460, F.A.C., the definitions for initial connection charges and normal reconnection charges were subsumed in the definition of the premises visit charge. Please revise those charges to conform to the revised Rule 25-30.460, F.A.C.

RESPONSE: It is recommended that the form Tariffs on the PSC website be updated to reflect this Rule change. Attachment 2DR, #3 hereto are the Water and Wastewater Tariff Sheets reflecting this definitional change, as well as Schedule 6 of the Accounting Information.

4. The Utility requested a charge for meter test deposit of \$63.51 to recover the cost for bench testing water meters. Pursuant to Rule 25-30.266(2)(a), F.A.C., the utility may require a deposit to defray cost of any bench test requested by any customer. However, the deposit may not exceed the following schedule:

<u>Meter Size</u>	<u>Fee</u>
5/8 and 3/4	\$20.00
1 and 1 1/2	\$25.00
2 and over	Actual Cost of Test

If the Utility would like to continue with their request for meter test deposit, GPU would need to file a rule waiver for Rule 25-30.266(2)(a), F.A.C., and submit cost justification for the requested amount.

RESPONSE: The default water meter test amounts provided above are acceptable to the Utility. No rule waiver is requested. Attachment 2DR, #4 hereto is the Water Tariff Sheet reflecting this change.

5. In Schedule 6, GPU provided cost justification for miscellaneous service charges, but did not include labor cost justification to determine the direct expense of outside service. Please provide a breakdown of labor cost associated with the direct expense of outside service.

RESPONSE: GPU does not have a breakdown for the direct expense of outside services. The amount of direct expense of outside services is the amount provided by the outside service provider for the cost of a premise visit.

June 14, 2022

Page 3

Should you or Staff have any questions regarding this response please do not hesitate to contact me.

Very truly yours,

/s/ Martin S. Friedman

Martin Friedman

MSF:

Cc: Melinda Watts (via email)

Shaw Stiller (via email)

MISCELLANEOUS SERVICE CHARGES

The Company may charge the following miscellaneous service charges in accordance with the terms stated herein. If both water and wastewater services are provided, only a single charge is appropriate unless circumstances beyond the control of the Company require multiple actions.

VIOLATION RECONNECTION - This charge may be levied prior to reconnection of an existing Customer after disconnection of service for cause according to Rule 25-30.320(2), Florida Administrative Code, including a delinquency in bill payment.

PREMISES VISIT CHARGE - This charge may be levied when a service representative visits a premises to discontinue service for nonpayment of a due and collectible bill and the customer pays the service representative or otherwise makes satisfactory arrangements to pay the bill and service is not disconnected. The premises visit charge is also levied when a customer service representative visit the premises at the customer's request to (1) initiate service, (2) reconnect service after a temporary disconnection, or (3) assesses a service issue and it is found to be the customer's responsibility.

LATE PAYMENT CHARGE – This charge may be levied when a customer is delinquent in paying a bill for service, pursuant to Rule 25-30.335(4), F.A.C.

NSF CHARGE - This charge may be levied pursuant to Section 68.065, Florida Statutes, when a customer's payment is refused by the drawee because of lack of funds, lack of credit, or lack of an account.

Schedule of Miscellaneous Service Charges

	During Regular Business Hours	After Regular Business Hours
Violation Reconnection Charge	Actual Cost	Actual Cost
Premises Visit Charge	\$46.05	N/A
Late Payment Charge	\$ 5.00	
NSF Check Charge	Pursuant to Section 68.065, F.S.	

(Continued on Sheet No. 16.1)

EFFECTIVE DATE – _____, 2022

TYPE OF FILING – Original Certificate

MISCELLANEOUS SERVICE CHARGES

The Company may charge the following miscellaneous service charges in accordance with the terms stated herein. If both water and wastewater services are provided, only a single charge is appropriate unless circumstances beyond the control of the Company require multiple actions.

VIOLATION RECONNECTION - This charge may be levied prior to reconnection of an existing Customer after disconnection of service for cause according to Rule 25-30.320(2), Florida Administrative Code, including a delinquency in bill payment.

PREMISES VISIT CHARGE - This charge may be levied when a service representative visits a premises to discontinue service for nonpayment of a due and collectible bill and the customer pays the service representative or otherwise makes satisfactory arrangements to pay the bill and service is not disconnected. The premises visit charge is also levied when a customer service representative visit the premises at the customer's request to (1) initiate service, (2) reconnect service after a temporary disconnection, or (3) assesses a service issue and it is found to be the customer's responsibility.

LATE PAYMENT CHARGE - This charge may be levied when a customer is delinquent in paying a bill for service, pursuant to Rule 25-30.335(4), F.A.C.

NSF CHARGE - This charge may be levied pursuant to Section 68.065, Florida Statutes, when a customer's payment is refused by the drawee because of lack of funds, lack of credit, or lack of an account.

Schedule of Miscellaneous Service Charges

	During Regular Business Hours	After Regular Business Hours
Violation Reconnection Charge	Actual Cost	Actual Cost
Premises Visit Charge	\$46.05	N/A
Late Payment Charge	\$ 5.00	
NSF Check Charge	Pursuant to Section 68.065, F.S.	

(Continued on Sheet No. 16.1)

EFFECTIVE DATE – _____, 2022

TYPE OF FILING – Original Certificate

Gibson Place Utilities, LLC
Initial Rates and Charges
Cost Justification for Miscellaneous Service Charges

Line No.	Description	Charge During Regular Business Hours	Charge After Regular Business Hours
1	Premise Visit Charge (1)	\$46.05	N/A
2			
3	Violation Reconnection	Actual Cost	Actual Cost
4			
5	Damaging / Tampering / Altering Meter or Utility System	Actual Cost	Actual Cost
6			
7	Backflow Prevention Assembly Testing / Repair / Installation	Actual Cost	Actual Cost
8			
9	Grease and Oil Collection Device Cleaning/Repair/Installation	Actual Cost	Actual Cost
10			
11	Water Meter Testing Fee (2)		
12	5/8" and 3/4:	\$20.00	
13	1" and 1 1/2"	\$25.00	
14	2" and over	Actual Cost of Test	
15			
16	Deposit for Temporary Meter	Actual Meter Cost	N/A
17			
18	Late Fee	\$5.00	
19			
20	Notes:		
21	(1) Direct expense of outside service	\$34.92	
22	Customer service cost	<u>\$11.13</u>	
23	Total	\$46.05	
24			
25			
26	Total new connections	3,036	
27	Water	\$ 139,808	
28			

ATTACHMENT 2DR, #4

GIBSON PLACE UTILITY COMPANY, LLC
WATER TARIFF

ORIGINAL SHEET NO. 15.0

METER TEST DEPOSIT

METER BENCH TEST REQUEST - If any Customer requests a bench test of his or her water meter, in accordance with Rule 25-30.266, Florida Administrative Code, the Company may require a deposit to defray the cost of testing; such deposit shall not exceed the schedule of fees found in Rule 25-30.266, Florida Administrative Code.

<u>METER SIZE</u>	<u>FEE</u>
5/8 and 3/4	\$20.00
1 and 1 1/2	\$25.00
2 and over	Actual Cost of Test

REFUND OF METER BENCH TEST DEPOSIT - The Company may refund the meter bench test deposit in accordance with Rule 25-30.266, Florida Administrative Code.

METER FIELD TEST REQUEST - A Customer may request a no-charge field test of the accuracy of a meter in accordance with Rule 25-30.266, Florida Administrative Code.