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# Public Service Commission

October 29, 2009

F. Marshall Deterding  
Rose, Sundstrom & Bentley, LLP  
2548 Blairstone Pines Dr.  
Tallahassee, FL 32301

Staff's First Data Request  
Nos. 18-40

**Re: 080695-WU, In re: Application for general rate increase by Peoples Water Service Company of Florida, Inc.**

Dear Mr. Deterding:

By this letter, the Commission staff requests that Peoples Water Service Company of Florida, Inc. (company or utility), provide responses to the following data and document requests:

### Data requests

18. For the purpose of this question, please refer to the utility's response to Staff's First Data Request, question no. 1(c). Please provide, for each service address provided in the response, a grouping of all service addresses which are served by the same meter.
  
19. The following questions refer to the utility's application of multiple minimum billing (MMB).
  - a. When the utility applies MMB, the fixed charge portion of the bill is the base facility charge for a 5/8" x 3/4" meter, regardless of actual size of the meter through which the water flows, correct?
  - b. If the response to (a) is negative, please describe how the utility determines the appropriate MMB fixed charge portion of a bill.

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- c. If the response to (a) negative, what is the utility's rationale for the amount of MMB billed by the utility in response to (b) above?
- d. Is the utility aware of any other case(s) in which the Florida Public Service Commission (Commission) approved MMB?
- e. If the response to (d) affirmative, please indicate the name of the utility, as well as the docket number in which MBB was approved by the Commission.
- f. For each of the following customer classes, please provide both the total hydraulic flows and the number of customers served within that class:

<u>Customer Class</u>	<u>Total Hydraulic Flows</u>	<u>Number of Customers Served</u>
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20. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0051, served by a 5/8" x 3/4" meter. The AWWA meter factor for this meter is 1.0.

- a. Would the utility apply MMB if the number of units served behind the meter is greater than 1?
- b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
- c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?

21. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0052, served by a 1" meter. The AWWA meter factor for this meter is 2.5.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 2.5?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
22. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0053, served by a 1 1/4" meter. The AWWA meter factor for this meter is 4.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 4?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
23. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0054, served by a 1 1/2" meter. The AWWA meter factor for this meter is 5.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 5?

- b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
24. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0055, served by a 2" meter. The AWWA meter factor for this meter is 8.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 8?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
25. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0056, served by a 3" meter. The AWWA meter factor for this meter is 16.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 16?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?

26. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0057, served by a 4" meter. The AWWA meter factor for this meter is 25.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 25?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
27. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0058, served by a 6" meter. The AWWA meter factor for this meter is 50.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 50?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
28. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0011, served by a 5/8" meter. The AWWA meter factor for this meter is 1.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 1?

- b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
29. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0012, served by a 1" meter. The AWWA meter factor for this meter is 2.5.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 2.5?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
30. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0013, served by a 1 1/4" meter. The AWWA meter factor for this meter is 4.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 4?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?

31. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0014, served by a 1 1/2" meter. The AWWA meter factor for this meter is 5.
- Would the utility apply MMB if the number of units served behind the meter is greater than 5?
  - If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
32. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0015, served by a 2" meter. The AWWA meter factor for this meter is 8.
- Would the utility apply MMB if the number of units served behind the meter is greater than 8?
  - If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
33. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0016, served by a 3" meter. The AWWA meter factor for this meter is 16.
- Would the utility apply MMB if the number of units served behind the meter is greater than 16?

- b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
34. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0017, served by a 4" meter. The AWWA meter factor for this meter is 25.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 25?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
35. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0018, served by a 6" meter. The AWWA meter factor for this meter is 50.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 50?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?



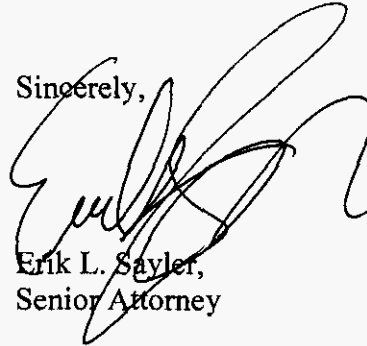
36. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0071, served by a 5/8" meter. The AWWA meter factor for this meter is 1.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 1?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
37. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0072, served by a 1" meter. The AWWA meter factor for this meter is 2.5.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 2.5?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
38. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0073, served by a 1 1/4" meter. The AWWA meter factor for this meter is 4.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 4?

- b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
39. For the purpose of the following questions, please assume a multiple minimum billing (MMB) customer, rate code 0074, served by a 1 1/2" meter. The AWWA meter factor for this meter is 5.
- a. Would the utility apply MMB if the number of units served behind the meter is greater than 5?
  - b. If the response to (a) is affirmative, would the utility apply the base facility charge for a 5/8" x 3/4" meter?
  - c. If the response to (b) is negative, what specific condition(s) lead the utility to decide not to implement MMB?
40. In response to Staff's First Data Request, question no. 1, the utility stated that the Board of County Commissioners (BOCC) of Escambia County approved MMB in 1977 as well as in subsequent rate proceedings. Please provide a copy of the most recent BOCC Order approving MMB. Please ensure that the Order contains both a discussion of MMB, as well as a schedule of rates indicating the BOCC's approval of MMB and its applicability.

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Please file the original and five copies of the requested information by November 6, 2009, 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) 413-6084 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erik L. Saylor', written over the word 'Sincerely,'.

Erik L. Saylor,  
Senior Attorney

ELS/els

cc: Office of Commission Clerk  
Peoples Water Service Company of Florida, Inc.  
Economic Regulation (Kummer, Stallcup, Lingo, Piper, Thompson)  
Regulatory Compliance (Casey, Polk, Beard)