LP WATERWORKS, INC.

FILED MAY 19, 2017 DOCUMENT NO. 04926-17 FPSC - COMMISSION CLERK

May 19, 2017

Office of Commission Clerk Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399

Re: Docket No. 160222-WS - Application for Staff Assisted Rate Case (SARC) in Highlands County by LP Waterworks, Inc. – Response to Staff's Fourth Data Request

Dear Commission Clerk,

Please find attached LP Waterworks, Inc.'s (LPWW) response to Staff's Fourth Data Request in the above referenced docket.

- 1. In regards to Project: 2554-53 WWTP Washdown Well:
 - a. Please explain why this item of pro-forma was necessary.
 - b. Please detail the number of bids that were sought and received for this item.
 - c. If there are less than three bids, please explain why.
 - d. Please provide the bids that were received.
 - e. If the lowest bid was not selected, please explain why.

<u>Response</u>: This was for repairs to the washdown well at the wastewater treatment plant. Washdown wells are required in the wastewater treatment process to clean the equipment and weirs and wash down the plants. All wastewater treatment plants utilize fresh water during this process. Pursuant to the Operations and Maintenance Agreement with U.S. Water Services Corporation (USWC), Section 2.8:

2.8

USWSC shall operate, maintain and/or monitor the Irrigation System as WMD permitting dictates and maintain a 24-hour per day, seven-day per week scheduled, on call emergency staff and live answering service. <u>USWSC will</u> respond to call outs, <u>assess the situation and make necessary arrangement to</u> <u>contain or repair the problem</u>. USWSC shall notify the OWNER of emergency type repairs within 2 hours of incident.

In addition, Section 2.24 states:

2.24

USWSC shall perform minor repairs - repairs that can be performed by the Collection and Distribution Technician, plant operators or maintenance personnel without assistance (Totaling Less than \$400.00 in USWSC Expense per incident), such as painting, changing motor oil, changing air filters, greasing equipment, cleaning equipment and troubleshooting equipment failures.

Any repairs and/or replacements below the \$400 limit are covered in the annual contract and monthly payments. All repairs and/or replacements above the \$400 limit are the responsibility of the OWNER, which is the utility. This actually provides a benefit to both the utilities and the customers. Since all repairs and/or replacements under the \$400 threshold are included in the annual contract amount and not charged individually to the private utility, the recorded capital is kept to a minimum and the rate base also reflects lower amounts. If each repair/replacement under \$400 was recorded pursuant to the Class C USOA provisions, this would allow an additional return on these amounts in rates. By establishing a monetary threshold which is consistent with the NARUC USOA, the utility's customers are receiving an added benefit. Since any repair and/or replacement under \$400, as specified in the USOA for Class B utilities would be considered O&M expenses, these would qualify as prudent expenses and are recoverable on a dollar-for-dollar basis. Since these type repairs and replacements are covered under the operations and maintenance contract and not charged to the utility, the resulting rates do not include these items. U.S. Water Services bears the ultimate risk when there are numerous repairs that occur during any given month since these are not charged to the utility. Thus, U.S. Water is actually subsidizing the utility by covering these services in its contracted amount. There are no separate charges for these amounts.

Table 4 – Cost Responsibilities					
USWSC	Owner				
1. Operation of the Irrigation Water Facilities	1. Chemicals, if any				
2. Operation and Maintenance of Collection and Distribution Systems	2. Sludge Transport and Disposal				
 Sampling and Laboratory Analysis per Appendices D & E 	 Utilities – Purchased Power, Phones/SCADA, Purchased 				
	Water/Wastewater Services				
4. Reporting	4. Capital Items or Major Repairs				
5. Transportation	5. Property Insurance				
6. Personnel	6. Regulatory Fees				
7. Safety	7. Bad Debts & Write-offs				
8. Training	8. Legal Fees				
9. Customer Service / Billing / Collection	9. Federal Taxes				

Table 4 of the USWSC Agreement delineates the various responsibilities of both USWSC and the utility (Owner). See below:

10. Minor Repair Less than \$400 in USWSC	10.Banking Fees
Expense per incident	
11.Emergency Generator Maintenance and Fuel	11.Locate Service Fees / Sunshine
12.Service Work	12.Meters
13.Grounds Maintenance	13.Permit Fees for Regulatory Permits
14.Operating Permit Renewals	14.Property Taxes
15.Meter calibrations	15.New Service Connection for Water
	and Wastewater Services
16.Backflow prevention testing	16.Repairs Totaling \$400.00 or greater
	per incident
17.Trash Removal	Tax Return Filings
18.Accounting for PSC and General Ledger	
19.Tank Inspections	
20.Locate Services	
21.On-call and initial emergency callouts	
22.Plant upkeep and good housekeeping	
23. Laboratory Services	
24. System Preventative Maintenance (CMMS)	
25. Update system maps	
26.Tools, Vehicles, Testing Equipment	
27.Preventive Maintenance	
28.Fire Hydrant Testing as Required	
29. Maintain Record Keeping, General Ledger, and	
Filing Systems.	

- 2. In regards to Project: 2554-54 Replace Gas Chlorine Injector #2:
 - a. Please explain why this item of pro-forma was necessary.
 - b. Please detail the number of bids that were sought and received for this item.
 - c. If there are less than three bids, please explain why.
 - d. Please provide the bids that were received.
 - e. If the lowest bid was not selected, please explain why.

Response: This was an emergency repair to the chlorine disinfection treatment system at the potable water well. The utility is required to maintain disinfection and chlorine residual to its customers pursuant to Florida Department of Environmental Protection (FDEP). The operator was not able to maintain a chlorine residual in the hydropnuemantic tank. The chlorine injector needed replacement to maintain the required disinfection and chlorine residual. During emergencies such as this, it is impractical to obtain numerous bids. The emergency repairs must be made in an expeditious manner to ensure customer safety and regulatory compliance. For major projects and/or replacements, the utility would solicit bids for selection. For repair and replacement (See Attached). This schedule may be updated annually based on CPI depending on the current economic conditions. If the economic conditions are unfavorable, these fees may not be increased. These Service Fees have not been changed since the date of execution, or for the past several years. As previously explained in the

last SARC (Docket No. 130153-WS), USWC used the RSMeans® Heavy Construction Cost Data to conduct cost analysis. Typically the fees charged by USW are under the RSMeans® costs. RSMeans is a construction estimation database that is used by professional estimators for up to date labor, materials and overhead costs for specific project types and locations. Since 1942, RS Means has been actively engaged in construction cost publishing and consulting throughout North America. RS Means collects data from all facets of the industry, including both the private and public sectors, including federal, state, and municipal agencies, corporations, institutions, construction management firms, hospitals, and associations.

RS Means is the national leader for custom database development to fit any construction or facilities management situation. RS Means has developed and maintains a global cost estimating database for the U.S. Army Corps of Engineers and the Department of Defense. Means has developed a cost index for various building types for the U.S. Department of Labor, Bureau of Labor Statistics.

For the Schedule of Service Fees, items 1 through 9 are typically never charged to the regulated utilities. The main labor items charged to the regulated utilities for the service performed outside the normal contract are for (1) Tradesman, and (2) Maintenance Technician.

Below is a cost comparison for these two positions charged to regulated utilities:

	UWSC	RSMeans ®
Tradesman (Master Mechanic)	\$57.91	\$76.05
Maintenance Technician (Skilled Worker)	\$52.01	\$73.25

The actual time worked on either the repair or improvement outside the normal contract services is charged based on the record keeping of the USW employee on actual time worked on the specific project. The equipment is also charged based on the actual amount of time used on the specific project plus 18% markup. The 18% markup was derived at by using factors of 8% overhead and 10% profit. According to RS Means®, (1) the "Average Fixed Overhead for all services across the United States is 17.9%; (2) the Overhead varied from a low of 11% to a high of 16%; (3) while the Profit across all services was at 10%. Thus the Overall Overhead and Profit across all services across the United States varied from a low of 47.4% to a high of 80.4%.

3. In regards to Project: 2554-49 Meter Misc. Replacements:

- a. Please explain why this item of pro-forma was necessary.
- b. Please detail the number of bids that were sought and received for this item.
- c. If there are less than three bids, please explain why.
- d. Please provide the bids that were received.
- e. If the lowest bid was not selected, please explain why.

Response: These were for normal meter replacements for the quarter ending March 2017 (Jan-March). Meter replacements are billed quarterly and are the responsibility of the utility as shown in Table 4 above. This is provided for in the USWC agreement. Please see response to Data Request No. 1 above. No labor is charged for normal meter replacements, only the cost of the meter. The labor costs are included in the annual (monthly) amount of the contract, thus providing an additional savings and benefit to the customers.

4. Please provide updated rate case expense documentation, if any.

<u>Response</u>: See Document No. <u>04599-17</u> in the docket file. The reservation for the agenda has been changed to the correct date with no change in the rate.

5. Please describe the types of meters that are currently being used for customer metering within the service territory. Please include make, year and model for each type of meter.

<u>Response</u>: This will be provided under separate cover letter requesting confidential treatment as it contains customer names and addresses. For additional information, LP Waterworks purchased this utility on December 27, 2012. (See Order No. PSC-14-0130-PAA-WS) As part of the Settlement Agreement approved in Order No. PSC-14-0413-PAA-WS, issued August 14, 2014, LP Waterworks replaced 97 meters. In the Approved Settlement Agreement, it stated:

6.	Replace water meters that have up to	\$8,472.95
	900,000 gallons of use (97 meters)	

These meters were replaced in 2014. This utility has been in operations since 1988 (See Docket Nos. 881608 and 990374) and it is unknown whether the previous owner had replaced any water meter since initiation of the utility. One should also keep in mind, in 2014, these meters had been in operation for 24 years already. This becomes evident when the depreciated value is considered. In Order No. PSC-14-0130-PAA-WS, issued March 17, 2014, the Commission determined that the meters were 75% depreciated as of December 27, 2012.

6. Please explain the process used for reading customer meters in the LP Waterworks, Inc. service territory, including whether the meters can be read remotely or if they require manual reading.

<u>Response</u>: The water meters at LP Waterworks are not electronic. They are read manually each month. They are scheduled between 28 - 32 days each month. The read sheets are sent out to the field technician responsible for meter readings. The meters are read and the technicians are required to annotate all digits including the stationary zero. The meter reads are sent to centralized billing to be entered into the customer data base for billing. They are then uploaded into the billing system.

7. Please detail the last meter inspection performed on the meters within the service territory, per rule 24-30.265, F.A.C.

<u>Response</u>: The correct rule reference is Rule 25-30.256. F.A.C. LP Waterworks purchased this utility on December 27, 2012. (See Order No. PSC-14-0130-PAA-WS) As previously stated, this utility has been in operations since 1988 (See Docket Nos. 881608 and 990374) and it is unknown whether the previous owner had replaced any water meter since initiation of the utility. As discussed in response to No. 5 above, 97 meters were replaced in 2014. Six (6) additional meters have also been replaced.

According to the AWWA Manual M6, "It may be more prudent to measure the life of a meter by total consumption rather than by time." Further, the M6 Manual states, "A planned meter replacement program can be implemented over a given number of years; for example 10 percent of the meters each year over 10 years or 20 percent per year over 5 years, so that all replaced meters in the system will be the more efficient, modern design." Thus, when meters start to wear out after high usage, they begin to read slower than actual usage. This causes at least three affects, (1) higher unaccounted for water; (2) lost revenues due to non-registering water use; and (3) less conservation due to the customers not accurately being billed for actual consumption.

The utility intends to replace meters when they either (a) reach ten years of in service, or (b) reach 1,000,000 gallons of usage on the register. All of the meters were inspected for the appropriate meter register in 2016 and additional inspections will occur in May 2017.

In addition, there have been eighteen (18) field bucket test performed on customer meters since 2015.

8. Please provide a picture of a customer meter with the meter register plainly visible and readable.

<u>Response</u>: See attached pictures for 305 Shoreline Dr and 303 Shoreline Dr. More pictures will be obtained this weekend and will be sent as a supplemental response.

9. Within the past three years, has there been any circumstances in which the utility needed to estimate customer bills? If so, please explain.

Response: Yes, since purchase of the utility in 2012, there have been thirty-six instances of customer's meters being estimated. Of these, fourteen (14) were on inactive accounts. Assuming 446 meters (customers) for 53 months, this represents less than $\frac{1}{2}$ % or 0.0015% in estimations. (36÷(446*53 months) over this period of time. This significantly low amount does not constitute a systemic issue.

There are numerous reasons meters may be estimated. Some of these reasons are:

- Access issues (cars over meter, gate locked, dog, can't locate meter, etc...)
- Damaged meter can't read dial or dial damaged
- Bees/wasp/snake or other varmints in box
- Meter stolen
- Area flooded
- High read and we are unable to get back to the meter during that particular billing cycle
- 10. At the customer meeting held on April 18, 2017, Mr. Richard Spencer, explained that he was not receiving his monthly bill on time and was incurring late fees. Please explain Mr. Spencer's billing history with the utility and any contact that has been made with this customer.

Response: A review of Mr. Spencer's account and call activity reveals that this issue has been on-going since the purchase of the utility. Below is a summary of the customer contact concerning this issue:

- > 2/15/13 customer called stating he had not received his bill. Was told that it was mailed out on 2/5/13 and that he should receive soon.
- 02/03/14 customer called and stated he had not received a bill since October. Stated that from November to April he is at XX Sand Pine Cir and the rest of the year he is at a New York address. He was advised that a copy of the bill would be mailed to the Sand Pine Cir. Address. (*address omitted for confidentiality*)
- 02/11/14 customer called to find out bill amounts for last few months.
- 04/04/2014 customer called stating he is not receiving bills forwarded correctly by the Post Office. Customer was mailed copies of all statements from October to the service address. Late fee was removed as a courtesy. Customer stated he is returning to New York at the end of April.
- 04/22/2014 customer was called and verified mailing address.
 Added a box number to his New York address
- 04/22/2014 Primary Address was changed to add box number to his New York mailing address
- 10/18/2014 a return call was made to customer from his message. Customer called stating he hasn't received a bill since he made payment in April. Customer was advised there is a credit on his account and a copy of his statement was mailed to him
- 06/12/2015 customer called and advised he is still not receiving his bills. His address was verified and customer confirmed his mailing

address with the CSR. Customer stated that he has not been at his Florida address since April 2014. Customer was advised that there has been water consumption at his residence since April. Customer stated that there were two ladies at his property for one month. Customer was asked if he'd like a temporary disconnect but customer said no. Customer was mailed his transaction history. Customer was also advised that no return mail had been received.

- > 07/27/2015 customer called to verify balance on his account
- 08/25/2015 customer called to verify balance on his account. Customer again stated that he had not received all of his bills. The CSR once again verified his mailing address and that the mailing address on his account was correct. Customer was advised that he may want to contact his post office to find out why he is not receiving his bills. Customer states that talking to the post office would do no good. Customer was offered e-billing but customer declined due to the fact he does not have an e-mail address. Customer stated he would mail payment today.
- 09/15/2015 Customer called concerning his mail. Stated he is not receiving his bills. CSR again double checked his street address and P.O. Box and zip code on the account. The customer records are correct on the billing system. Again suggested customer contact the post office. Customer stated he already done that. Customer would like a resolution again stated he does not have an e-mail address.
- > 09/16/2015 customer called for balance on his account.
- 10/21/2015 customer called to ask if bill had been mailed out. Customer was advised that bill was mailed and customer was giving the mailing date, balance, and due date. Customer stated he is very upset he is not receiving his bills on time. Customer was advised that his account would be updated.
- > 10/22/2015 Customer's account updated with P.O. Box number
- 12/01/2015 customer called for his December balance. Customer was advised that the bill had not been posted yet. Customer stated that he would be out of town until 12/16. Customer was informed that his December bill would not be due until the end of the month.
- > 12/16/2015 customer called to confirm bill amount and due date
- 02/23/2016 customer called about his January payment sent on 1/15/16. Customer was informed that payment had not been received and that his late fee would be waived. Customer stated that

he would call back on Fri or Mon to see if received, if not he would pay both bills by credit card.

- 02/25/2016 customer called with a credit card payment. The credit card was declined, CSR will contact customer of decline
- > 02/26/2016 credit card payment was re-ran and was accepted.
- 02/26/2016 customer was contacted that credit card payment was successful – confirmation number provided
- Customer called in credit card payments on 03/22/2016; 04/19/2016; 05/13/2016; and 06/13/2016
- Customer called and would like to set up automatic payments (ACH) from his account. Was advised that the required form would be mailed to him so he can mail back a voided check with his information
- > 07/13/2016 customer called in credit card payment
- 08/12/2016 CSR called customer. Customer stated he could not talk right now since he was at dinner. Customer was advised to call back when he is able to talk
- 08/30/2016 customer called for his balance. Customer was informed that payment was posted on 8/22/2016 and balance was zero
- > 10/12/2016 customer called for his balance
- 11/03/2016 customer called to request copy of his statement. Customer was advised it would be mailed to him today
- > 11/14/2016 customer called for his balance
- 12/13/2016 CSR contacted customer to inform customer the wrong
 P.O. Box was on the account and that his statement was corrected.
 Statement was not sent as customer had already paid the balance.
- 12/13/2016 customer called back with actual address to send to. Customer was advised the next bill would go to the address provided.
- Customer called for balances on 01/20/2017 and 02/21/2017
- 02/24/2017 Customer called. Customer refuses to let utility change the address to the Florida address because he stated that he never knows when he will be there or in New York. CSR offered ebilling and ACH. Customer refused both and stated he wants us to mail the bills
- Customer called for balances on 03/13/2017 and 03/14/2017

Additional Pro Forma Plant

Please find attached additional invoices to be considered for pro forma plant. The first is an invoice paid for reimbursement of a sewer line repair. This emergency repair was made by the Camp Florida P.O.A. The POA contacted the utility concerning an emergency sewer leak under the street. LPWW agreed to have the POA repair the leak and receive reimbursement. LPWW received the invoice and re-paid the POA for the repair.

The second invoice is for the replacement of the gate at the LPWW wastewater treatment plant. The gate was inoperable and required replacement. This gate is required for security of the WWTP and for access to the plant by the operator.

Both of these repairs and replacements were performed by outside contractors and the invoices are attached.

Respectfully Submitted,

3 Render

Troy Rendell Manager of Regulated Utilities // for LP Waterworks, Inc.



ATTACHMENT G

SCHEDULE OF SERVICE FEES

Effective May 1, 2014

1	Principal	\$ 166.52 per hour
2	Director of Engineering Services: (Registered Professional Engineer)	\$ 145.89 per hour
3	Engineer III (Registered Professional Engineer)	\$ 130.28 per hour
4	Engineer II	\$ 106.82 per hour
5	Engineer I	84.33 per hour
6	Sr. Environmental Consultant	\$ 125.70 per hour
7	Hydrogeologist (Registered Professional Geologist)	\$ 118.17 per hour
8	Sr. Project Manager /Utility Manager, CIP or PSC Filings	139.66 per hour
9	Project Manager	98.92 per hour
10	Field Inspector	95.86 per hour
11	Engineering Technician	62.14 per hour
12	Cad Operator	\$ 66.99 per hour
13	Instrumentation/Control Technician/Maintenance Supervisor/Chief Mechanic	\$ 89.43 per hour
14	Lab Tech/Collection Capture	\$ 42.66 per hour
15	Tradesman	\$ 57.91 per hour
16	Maintenance Technician	\$ 52.01 per hour
17	Welder/Fabricator	\$ 65.00 per hour
18	Utility Electrician	\$ 67.82 per hour
19	Certified Cross Connection Control Technician (Backflow Prevention Technician)	\$ 73.37 per hour
20	Water and Wastewater Plant Operator (LEAD)	\$ 79.01 per hour
21	Water and Wastewater Plant Operator	\$ 58.19 per hour
22	Administrative Support	\$ 52.37 per hour
23	Materials and reimbursable expenses will be billed at actual cost plus: 18%	18%
24	Automobile Travel Mileage Reimbursement Associated With Consulting Services	\$ 0.55 per mile
25	Disposal Fee for Disposal of Non Hazardous Material and Debris.	\$ 13.99 per visit
26**	Labor Rates of 1.5 times the regular hourly rate will apply under the following circumstance	• • • • • • • • • • • • • • • • • • •
	**Monday - Friday from 4:00pm to 7:00am and Weekends at All Hours	
27		

- 27 Labor Rates of 2.0 times the regular hourly rate will apply on holidays recognized by US Water.
- 28 Operations Supplies provided will be billed at actual cost plus 18%.

EQUIPMENT

29	Confined Space Entry – With Permit and Equipment	\$110.00 per/entry
30	Diaphragm Pump Rental	\$ 52.37 per/day
31	Submersible Bypass Pump Rental	\$ 79.01 per/day
32	Cut Saw Rental	\$ 29.11 per/day
33	Cut Saw Blades	\$ 11.65 each
34	RPZ Certification	\$145.60 each
35	Lift Station Calibration and Testing	\$368.78 each
36	Pressure Washer	\$ 28.04 per/hour
37	Pressure Jetter	\$ 84.68 per/day
38	Cutting Torches	\$ 84.68 per/day
39	Crane Truck	\$138.12 per/hour
40	VacTruck/Residuals Hauler	\$317.51 per/hour
41	Residual Liquid Hauled	\$ 0.39 per/gallon
42	Pump Hoist	\$ 78.08 per/day
43	TV Camera	\$ 88.52 per/foot





CAMP FLORIDA P.O.A.		INVOICE
231 Shore Line Dr. Lake Placid, Florida 33852 cfrpoamail@gmail.com	Invoice No.: 1001 22-Mar-17	
P: 123-555-0123		
F: 123-555-0124		
BILL TO: U. S. Water attn: Ron DeRossett 4939 Cross Bayou Blvd. New Port Richey, Fl. 34652 904-540-9765	SHIP TO:	
DESCRIPTION		AMOUNT
Sewer Repair		
Parts, coupling, pipe, rubber sleeve		\$24.64
One hour back hoe		\$40.00
Labor		\$255.00
Tax		\$23.97
	2	
Entered: COA Code:		
Approved: <u>3</u> Paid: <u>ct #</u>	21-17 C	
	21/17	
SHIF	PING	
т	OTAL	\$343.61

Make all checks payable to CAMP FLORIDA P.O.A.

Thank you for your business!

From the office of Bruce Ridley

President of the Camp Florida Property Owners Ass'n.

Date: March 16, 2017

To: Ron DeRossett

From: Bruce Ridley

At: Camp Florida

Subject: Sewer leak dated 2-14-2017

Dear Ron,

If you recall, I called you on 2-14-2017 about an emergency situation in Circle B in Camp Florida, where we had a sewer leak under the street. The home owner had contacted a contractor, who was working on the job when they discovered that the leak was under the street. I contacted you by phone and you indicated that we should go ahead and fix the pipe. Your worker Chris, was in attendance.

I am enclosing the bill which I have paid to expedite matters. Please remit the balance to Camp Florida Property Owners Ass'n., 231 Shore Line Dr., Lake Placid, Florida, 33582.

I am enclosing a copy of the original paperwork.

\$ 343.67

PWW

Warmest Regards,

Bruce Ridley

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	Approved: <u>C</u> 3-21-17
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4939 Cross Bayou Boulevard New Port Richey, FL 34652

Bill To

727-848-8292 Ext 219

asantiago@uswatercorp.net

LP Waterworks Attn: Joe Gabay 4939 Cross Bayou Boulevard New Port Richey, FL 34652

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Invoice #	845138
Date	3/1/2017
Due Date	4/15/2017
Account #	2554
P.O. or W.A #	0 - 10 - 11 - 11 - 11 - 11 - 11 - 11 -

				Project		
			2	2554-52 Rer	nove/Replace Gate	es
Date		Description	Qty	U/M	Rate	Amount
	Removed	and installed new gates at WWTP.				
12/18/2016	Materials	and Labor to Complete Scope of Servio	xe 1		525.00	525.00
	L F	Entered: S COA Code: Som Approved: <u>C</u> Paid: <u>C</u> Date: <u>4</u> [2:117	354 23-21-07		÷	
Please remit p	ayment to	the above address. We appreciate	your business!	Total		\$525.0
				Paymo	ents/Credits	\$0.0
Telepho	e Ext 219	Email		Balan	ce Due	\$525.0

STATEMENT DELANEY FENCE CO., INC. 1186 C.R. 621 East • Lake Placid, FL 33852 Phone and Fax: (863) 465-2227		
US Water Services		
4939 Cross Rayuo Blid hum Piet Richen OL 34652		
Nuo	r7	
DATE	DESCRIPTION OR PURCHASE ORDER NO. 2554	-9 AMOUNT
218	Jahna Plant 29 PO-2554/82	525.00 OR
12-18	Conary Way Po/209/29	445.00
	U.S. Wandetervillige A	970.00
.cct: 50 N	, cotal P DOD /	
Millable:	Non-Billable:	, 54.8 ²
Entrd: 6	¿ Date: 1/27/17	1.PWN 2554-82 DAMA - 704-87
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TERMS: NET 10 DAYS