

# LP WATERWORKS, INC.

October 19, 2017

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FPSC - COMMISSION CLERK

Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32999-0850

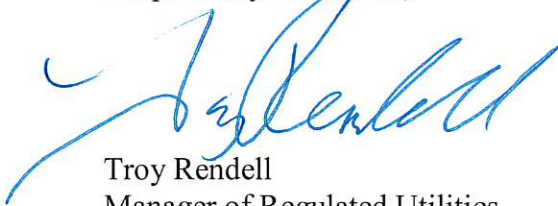
*Re: Re: Docket No. 20160222-WS - Application for Staff Assisted Rate Case  
(SARC) in Highlands County by LP Waterworks, Inc. – Response to Office of  
Public Counsel*

Dear Commission Clerk,

LP Waterworks, Inc. (LPWW) hereby submits the attached documentation concerning the response to the Office of Public Counsel pursuant to Order No. PSC-2017-0334-PAA-WS, issued August 23, 2017.

Please include this letter and attachment in the above reference docket.

Respectfully Submitted,



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

# LP WATERWORKS, INC.

October 19, 2017

Denise Vandiver  
Office of Public Counsel  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399-1400

*Re: Re: Docket No. 20160222-WS - Application for Staff Assisted Rate Case (SARC) in Highlands County by LP Waterworks, Inc. – Response to Office of Public Counsel*

Dear Ms. Vandiver,

Pursuant to Order No. PSC-2017-0334-PAA-WS, issued August 23, 2017, LP Waterworks, Inc. (LPWW) hereby submits its response to the Office of Public Counsel concerning billing questions.

LPWW's contractor, U.S. Water Services Corporation (USWSC) has various procedures to safeguard accurate monthly meter readings. First, the meter readers have been consolidated under the direct supervision of the USWSC customer service department. In the past, these meter reading technicians reported to the regional managers. With the consolidation of the meter reading personnel, greater efficiencies and accountability has increased significantly.

Second, the previous meter readings have recently been eliminated on the meter reading sheets sent out into the field. This was also done so that meter readers cannot look at the previous reading and then guess or make up a number higher than the previous month. The meter reading sheets are sent out with blanks to enter the actual reading. Third, field technicians are sent out to verify meter readings and meter accuracy on each customer concern. Anytime there is an issue in the utility (system), the technicians are instructed to obtain a meter reading at the time the service order is worked.

Finally, concerning "zero" reads and "backbilling," LPWW has implemented policies to review the zero reading reports on a regular basis. The monthly billings are reviewed to flag any high consumption and/or zero consumption. Subsequently, service orders are issued to do a meter inspection and conduct a re-read to verify the meter reading accuracy. All zero readings are reviewed and investigated at least quarterly. Since this customer base is highly seasonal, it is impractical to do this monthly. There may be 2-3 months with zero reads due to no occupancy in the RV park. Field personnel conduct site visits at each zero reading meter service order to obtain the current reading, and test the meter accuracy. This minimizes the number of back billings allowed under the FPSC rules.

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LP Waterworks, Inc.  
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LPWW's contractor, USWSC, also has recently hired a dedicated Customer Service Supervisor and analyst to oversee the outside contractor for the private regulated utilities. This Supervisor reviews customer complaints concerning billing issues, supervises the meter readers, and directly responds to customer complaints escalated to the supervisor level. This USWSC supervisor also interacts with the outside contractor (Opus 21) on utility customer complaints. This has also increased the response time and accuracy of customer responses significantly within the past year.

Respectfully Submitted,



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