THE OFFICE OF REGULATORY STAFF

DIRECT TESTIMONY AND EXHIBITS

OF

DENNIS J. KNIGHT

RECEIVED
2005 JUL 15 PM 4:26
SC PUBLIC SERVICE COMMISSION

DOCKET NO. 2005-110-WS

Petition of the Office of Regulatory Staff to Request Forfeiture of the Bond and to Request Authority to Petition the Circuit Court for Appointment of a Receiver

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2 **TESTIMONY OF DENNIS J. KNIGHT**

3 **FOR**

4 **THE OFFICE OF REGULATORY STAFF**

5 **DOCKET NO. 2005-110-WS**

6 **IN RE: PINEY GROVE UTILITIES, INC.**

7

8

9

10 **Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.**

11 A. My name is Dennis Knight. I am a resident of Lloydwood Subdivision and my
12 address is 104 Lloydwood Drive, West Columbia, South Carolina 29172. I own
13 and operate Knight's Plumbing Company located at 104 Lloydwood Drive, West
14 Columbia, South Carolina.

15 **Q. HOW LONG HAVE YOU BEEN A RESIDENT OF THE LLOYDWOOD**
16 **SUBDIVISION?**

17 A. 30 years.

18 **Q. WHAT IS THE NATURE OF YOUR BUSINESS?**

19 A. I own and operate a full-service plumbing company that provides plumbing
20 service to commercial and residential customers.

21 **Q. HOW LONG HAS KNIGHTS PLUMBING BEEN IN BUSINESS?**

22 A. We have been in business since April of 1981.

1 **Q. DESCRIBE THE BILLING PROBLEMS THAT YOU, AS A**
2 **HOMEOWNER IN THE LLOYDWOOD SUBDIVISION, HAVE HAD**
3 **WITH PINEY GROVE UTILITIES, INC?**
4 A. It is very difficult to contact the utility to discuss billing problems and problems in
5 general. Piney Grove Utilities, Inc. ("PGU") does not have an office located in
6 the area to discuss service or billing problems. PGU has not given me proper
7 credit for a payment that I made for sewer service on December 26, 2004.
8 Furthermore, PGU has compounded the problem by attempting to charge me a
9 $5.00 late fee for December 2004. See Exhibit DJK-1. This billing problem has
10 continued even after making several attempts to contact PGU about the error. See
11 Exhibit DJK-2. PGU has demanded payment of a $90 deposit for a problem
12 that was initially created by a billing error on their part. I am currently working
13 with the Office of Regulatory Staff to resolve this outstanding billing dispute.
14 This billing error problem is just one of many problems that I have been dealing
15 with concerning PGU.
16 **Q. WHAT OTHER PROBLEMS HAVE YOU HAD WITH PINEY GROVE**
17 **UTILITIES, INC.?**
18 A. On December 11, 2004, I, serving in my capacity with Knight's Plumbing
19 Company, was requested by a resident of the Lloydwood subdivision, Mr.
20 Tommy Looper, to assist with a sewer backup problem. Mr. Looper resides at
21 410 Old Plantation Drive. After assessing the problem, I proceeded to clean out
22 the service line at the tap in the street. The line was not stopped up on the side
23 belonging to Mr. Looper. Upon discussion of this matter with Mr. Reece

Williams by telephone, I forwarded my invoice for plumbing services to PGU to be paid. According to Mr. Williams, PGU would make payment on the invoice. However, Knight's Plumbing Company has no documentation of payment of this invoice by Mr. Williams or PGU.

On March 26, 2005, I was requested by a resident of the Lloydwood subdivision, Ms. Cassandra White, to assist with a sewer backup problem. Ms. White resides at 231 Lloydwood Drive. Following a visual assessment of the problem, I attempted to clean the sewer line from the cleanout adjacent to the street. The source of the backup problem was determined to be on the side belonging to PGU. I ran 110 feet of cable down the line on the side belonging to PGU. I was unable to solve the backup problem and the line remained stopped up. From my assessment, the line needed to be pressure treated to clean the line. I advised Ms. White to contact PGU for final resolution of the blockage. I indicated, in writing on the Knight's Plumbing service invoice, my assessment of Ms. White's service problem (Exhibit DJK-3).

Q. HAVE OTHER LLOYDWOOD SUBDIVISION RESIDENTS CONTACTED KNIGHT'S PLUMBING TO REPAIR THE PINEY GROVE UTILITIES, INC. COLLECTION SYSTEM?

A. Yes. Knight's Plumbing has received many calls from Lloydwood residents over the 24 years we have been in operation to resolve collection system blockages. It is my opinion that the collection system in the Lloydwood subdivision has substantial problems that require repair.

Q. DOES THAT CONCLUDE YOUR TESTIMONY?

A. Yes it does.

DIRECT EXHIBITS

OF

DENNIS J. KNIGHT

2005-110-W/S

Petition of the Office of Regulatory Staff to Request Forfeiture of the Bond and to Request Authority to Petition the Circuit Court for Appointment of a Receiver

Piney Grove Utilities

Lloydwood
P. O. Box 3096
West Columbia, SC 29171

Send ALL questions, in WRITING, to above address

Customer Number	Period Ending	Page Number	Telephone
2351-LL	01-31-2005	1	803 606-9224

DENNIS J KNIGHT
104 LLOYDWOOD DRIVE
WEST COLUMBIA SC 29172

To Ensure Proper Credit, Write Your Customer Number on Check or Money Order

Date	Description	Amount
	Service Location: 104 LLOYDWOOD DRIVE	
	Previous Balance	~~20.00~~
01-15-05	Late Fee for December, 2004	not paying ~~5.00~~
01-31-05	Sewer Fee for January, 2005	15.00
	PAST DUE AMOUNT = $20.00	
	December 2004	15.00
	November 2004	~~5.00~~ not paying late fee

This was paid 12-26-04 Check # 8998
Check cleared 1-3-05 - See below

DENNIS J. OR YVONNE L. KNIGHT
104 LLOYDWOOD DR. 796-8877
WEST COLUMBIA, SC 29172

8998

Date 12-26-04

67-448/639 SC
719

Pay to the order of Piney Grove Utilities $ 15.00

Fifteen + 00/100 Dollars

Bank of America

Bank of America Advantage®

ACH R/T 053904483

For 2351-LL

Yvonne Knight

⑆053904483⑆ 000055257521⑈ 8998 ⑈000000 1500⑈

15.00

Current	Over 30 Days	Over 60 Days	Over 90 Days	Sec Deposit	Pay This Amount
20.00	15.00	5.00		Zero	~~40.00~~

FOR DEPOSIT ONLY

053100380
123104
BANK OF AMERICA NA CAR
[illegible]
[illegible] E TRYON
[illegible] 01/03/05
P30 E C 017 SC
[illegible]

[illegible]
FCBT CO. INC.
RD RALEIGH NC
[illegible]

Piney Grove Utilities

Lloydwood
P. O. Box 3096
West Columbia, SC 29171

Send ALL questions, in WRITING, to above address

Customer Number	Period Ending	Page Number	Telephone
2351-LL	02-28-2005	1	See Note Above

DENNIS J KNIGHT
104 LLOYDWOOD DRIVE
WEST COLUMBIA SC 29172

To Ensure Proper Credit, Write Your Customer Number on Check or Money Order

Date	Description		Amount
	Service Location: 104 LLOYDWOOD DRIVE		
	Previous Balance		40.00
02-15-05	Late Fee for January, 2005		5.00
02-28-05	Sewer Fee for February, 2005		15.00
	PAST DUE AMOUNT = $40.00		
	January 2005	20.00	
	December 2004	15.00	
	November 2004	5.00	

DISCONNECTION OF SERVICE NOTICE

Your account is past due. Please remit payment in full or provide a WRITTEN EXPLANATION in the space below.

This MUST be postmarked on or before March 8, 2005 to avoid disconnection of your service AND a reconnection charge of $50.00. If you mailed your payment within the last 3 business days, please disregard this notice.

*** There will be no reconnections after 5:00 PM. ***
*** Reconnections will be made the following WORK day. ***

3-3-05 CALL me about this as you apparently did not read my letter from last month - (copy attached)
Dennis Knight 796 8877

Current	Over 30 Days	Over 60 Days	Over 90 Days	Spc Payment	Pay This Amount
20.00	20.00	15.00	5.00	Zero	60.00

Knight's Plumbing Company

104 Lloydwood Drive
West Columbia, South Carolina 29172

February 22, 2005

Mr. Reece Williams
Piney Grove Utilities
P O Box 3096
West Columbia, S. C. 29171

Dear Mr. Williams,

Since I haven't heard from you since our last phone conversation about 3 weeks ago, I am sending you a copy of the invoice we discussed. I am also enclosing a copy of my recent sewer bill for January 05. As you can see, the December bill was paid, so the balance due is only $15.00. (No late fees added in)

The original balance due on your invoice is $95.00 and since your invoice is over 60 days old, the late charges should be $10.00 (the same that you charged me) making your outstanding balance $105.00. I deducted the $15.00 I owe Piney Grove, leaving an outstanding balance due Knight's Plumbing of $90.00.

Let me know if you want me to continue deducting my monthly bill from Piney Grove's or if you plan to send me a check for the balance due. I will be awaiting your reply either by letter or phone.

Sincerely,

Yvonne Knight
Knight's Plumbing
796-8877

Knight's Plumbing Company

104 Lloydwood Drive
West Columbia, South Carolina 29172

5-3-05
update from last month
Please read and make
necessary adjustments on
my bill.

April 1, 2005

Mr. Reece Williams
Piney Grove Utilities
P O Box 3096
West Columbia, S. C. 29171

Dear Mr. Williams,

Since I haven't heard from you since our last phone conversation about 6 weeks ago, I am sending you a copy of the invoice we discussed. I am also enclosing copies of all the correspondence I've sent to you so far, including my recent sewer bill for March 05. As you can see, the December bill was paid, (please see copy of attached cancelled check), so I only owe for January, February and March and April which totals ~~$45.00~~. $60.00.

April

The original balance due on your invoice is $95.00 and since your invoice is over ~~90~~ 120 days old, the late charges should be ~~$10.00~~ 20.00 (the same $5.00 a month that you charge me) making your outstanding balance ~~$110.00~~ 115.00. I deducted the ~~$45.00~~ 60.00 I owe Piney Grove, leaving an outstanding balance due Knight's Plumbing of ~~$65.00~~ 55.00

Let me know if you want me to continue deducting my monthly bill from Piney Grove or if you plan to send me a check for the balance due. I will be awaiting your reply either by letter or phone.

Sincerely,

Yvonne Knight

Yvonne Knight
Knight's Plumbing
796-8877

Original invoice 95.00 you owe
less 4 months I owe 60.00
35.00 you still owe
(less any late charges)
that apply

Piney Grove Utilities

Lloydwood
P. O. Box 3096
West Columbia, SC 29171

Send ALL questions, in WRITING, to above address

Customer Number
2351-LL

Period Ending
04-30-2005

Page Number
1

Telephone
See Note Above 803-606-9224

DENNIS J KNIGHT
104 LLOYDWOOD DRIVE
WEST COLUMBIA SC 29172

To Ensure Proper Credit, Write Your Customer Number on Check or Money Order

Date	Description	Amount
	Service Location: 104 LLOYDWOOD DRIVE	
	Previous Balance	45.00 ~~80.00~~
04-08-05	Late Fee for March, 2005	~~1.20~~
04-30-05	Sewer Fee for April, 2005	15.00
	PAST DUE AMOUNT = $80.00	
	March 2005 ~~20.00~~ 15.00	
	February 2005 ~~20.00~~ 15.00	
	January 2005 ~~20.00~~ 15.00	
	December 2004 AND before ~~20.00~~ PAID 12-26-04 Check # 8998 check cleared 12-31-04	

DISCONNECTION OF SERVICE NOTICE

Your account is past due. Please remit payment in full or provide a WRITTEN EXPLANATION in the space below.

This MUST be postmarked on or before May 8, 2005 to avoid disconnection of your service AND a reconnection charge of $50.00. If you mailed your payment within the last 3 business days, please disregard this notice.

*** There will be no reconnections after 5:00 PM. ***
*** Reconnections will be made the following WORK day. ***

Current	Over 30 Days	Over 60 Days	Over 90 Days	Sec Deposit	Pay This Amount
16.20	20.00	20.00	40.00	Zero	60.00 ~~96.20~~

Piney Grove Utilities
Lloydwood
P.O. 3096
West Columbia , SC 29171

Knights Plumbing
Yvonne Knight
104 Lloydwood Dr.
West Columbia, SC 29172

Dear Mrs. Knight,

Please accept this letter as a sincere attempt to resolve your dispute with our billing statement.

Your December payment is posted. The canceled check copy shows an endorsement 1/03/05. That payment is applied to the November balance due. The statement provided (1 -31-2005) as your copy to the company reflects its posting. Your account has not posted any payments since December. The company understands your dispute and will on that basis adjust your billing statement including all late charges. Allow us to make these changes and any others. Please look for a new bill soon.

The work provided in care of Tommy Lapper reflected by your company invoice cannot be deducted from your residential billing statement. Mr. Lapper is not an agent of your company or ours. Your invoice will be listed a payable and look forward to reconciling that with him.

The occasional services you provide to your neighbors are welcome by this company. Our being in a related business and in the same neighborhood you have provided emergency relief to common customers. Fixing, repairing and emergency plumbing services for them is completely your decision. For them to expect an advantage because you are neighbors and customers related to the Utility Co., that puts into cycle greater responsibilities than the company can effect.

Thank you for your time and a copy of this letter will be provided to ORS, Chad Campbell.

C. HUGH SCOTT
EXECUTIVE DIRECTOR

Post Office Box 11263
Columbia, SC 29211

OFFICE OF REGULATORY STAFF
ORS
SOUTH CAROLINA

Phone: (803) 737-5230
Fax: (803) 737-4250

DAN F. ARNETT
CHIEF OF STAFF

APRIL B. SHARPE
MANAGER OF CONSUMER SERVICES

July 15, 2005

Ms. Yvonne Knight
104 Lloydwood Drive
West Columbia, S.C. 29172

In Re: Our File No.05-S-1409

Dear Ms. Knight:

This letter is sent in regard to your complaint filed with the South Carolina Office of Regulatory Staff against Piney Grove Utilities. Your complaint was received in the Consumer Services Division via a fax on May 3, 2005 and an investigation was initiated via a letter to the Company on May 11, 2005. Although the ORS staff has notified the Company of your complaint and has begun attempts to resolve this situation, the Company has not provided a response as of this time.

Please be advised, you have the right to file a *formal complaint* against the Company and request a hearing before the Public Service Commission. To file a formal complaint you should send a written request for a formal complaint hearing along with your written complaint. The written complaint should contain your name and address, the name of the utility company, a clear and concise statement of the factual situation surrounding the complaint and of the nature of the relief sought from the Public Service Commission. Your request for a formal complaint hearing should be mailed to: *Mr. Charles Terreni, Chief Clerk/Administrator, Public Service Commission, Post Office Drawer 11649, Columbia, South Carolina 29211.* The Public Service Commission may schedule a public hearing if it determines that reasonable grounds exist. At the hearing, both you and the company can present testimony before the Commission. After hearing the testimony, the Public Service Commission will make a decision and issue an Order ruling on your complaint.

Should you decide to request a hearing and file a formal complaint with the Public Service Commission, please provide a copy of your request to the South Carolina Office of Regulatory Staff and to the Company. If you have any questions or need further assistance, please contact me at 1-800-922-1531.

Sincerely,

Chad Campbell, Investigator
Consumer Services

c: Reece Williams, Piney Grove Utilities

RECEIVED
APR 2 9 2005
ORS
T,T,W,W/W

Del

KNIGHT'S PLUMBING CO.

104 Lloydwood Drive
West Columbia, SC 29172
(803) 796-8877

Job Invoice
11252

Bill To Cassandra White	Date 1/26/05
Address 231 Lloydwood Dr.	Phone 796-1729
City West Cola S.C.	Work Phone
Job Name & Location	
Sewer Line	

Attempted to clean the sewer line from the cleanout at the street. The problem is on the cities side. I ran 110 feet of cable down the line on the cities side. The line is still stopped up + needs a pressure truck to clean the line.	95	00
	95	00

ANY REPAIRS PERFORMED ON POLYBUTYLENE PIPE OR FITTINGS CARRY NO WARRANTY.

I hereby acknowledge the satisfactory completion of the above described work:

SIGNATURE Cassandra White

IMPORTANT: All accounts 30 days past due are subject to a Finance Charge of 2% PER MONTH, which is an ANNUAL PERCENTAGE of 24%