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August 8, 2006

VIA HAND-DELIVERY

The Honorable Charles L.A. Terreni
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RECEIVED
2006 AUG -8 PM 4:03
SC PUBLIC SERVICE COMMISSION

RE: Application of United Utility Companies, Inc. for adjustment of rates and charges and modifications to certain terms and conditions for the provision of water and sewer service; Docket No. 2006-107-WS

Dear Mr. Terreni:

Enclosed for filing are the original and twenty-five (25) copies of each of the following documents in the above-referenced docket:

1. Supplemental Rebuttal Testimony of Bruce T. Haas
2. Supplemental Rebuttal Testimony and supporting exhibit of Lena Sunardio

I would appreciate your acknowledging receipt of these documents by date-stamping the extra copies that are enclosed and returning them to me via my courier.

By copy of this letter, I am serving a copy of same on counsel for the Office of Regulatory Staff as well as the Intervenors and enclose a certificate of service to that effect.

RETURN DATE: 8/7/06 - Supp. OK
SERVICE:

(Continued . . .)

If you have any questions or if you need any additional information, please do not hesitate to contact us.

Sincerely,

WILLOUGHBY & HOEFER, P.A.

Benjamin P. Mustian

BPM/amw
Enclosures

cc: Shannon B. Hudson, Esquire
Nanette S. Edwards, Esquire
Duke K. McCall, Jr., Esquire
Jacqueline H. Patterson, Esquire
George Lyall, Esquire

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2006-107-W/S

IN RE: Application of United Utility Companies, Inc. for adjustment of rates and charges and modifications to certain terms and conditions for the provision of water and sewer service.	))))))))	**SUPPLEMENTAL REBUTTAL TESTIMONY OF BRUCE T. HAAS**

1 **Q. ARE YOU THE SAME BRUCE T. HAAS THAT HAS PREFILED DIRECT**
2 **TESTIMONY IN THIS CASE?**
3 **A.** Yes, I am.
4
5 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL REBUTTAL**
6 **TESTIMONY IN THIS PROCEEDING, MR. HAAS?**
7 **A.** The purpose of my supplemental rebuttal testimony is to respond on behalf of
8 United Utility Companies, Inc., or "UUC", to portions of the pre-filed direct testimony of
9 Larry Barnwell, Elaine King and Dr. James Epting on behalf of North Greenville
10 University, or "NGU".
11 **Q. TO WHAT PORTIONS OF MR. BARNWELL'S TESTIMONY DO YOU WISH**
12 **TO RESPOND?**
13 **A.** Mr. Barnwell states that, in his opinion, the sewer services used by NGU can be
14 measured on a per thousand gallon basis and that such a method would be more accurate

than the flat rate currently charged by UUC. Although it is not clear, it appears that Mr. Barnwell is asserting that UUC's sewer charges be based upon water consumption.

Q. DO YOU AGREE WITH HIS OPINION?

A. No, I do not. At first glance, Mr. Barnwell appears to be proposing a plausible and straightforward alternative to charging for sewer based on a flat rate. However, the services that UUC currently provides to NGU do not lend themselves to charges for sewer based upon metered water usage. The principle reason this proposal is inappropriate is that UUC only provides wastewater services to NGU. NGU does not receive its water service from UUC and I understand that Blue Ridge Water Company is its water supplier. It would be unreasonable for UUC to be required to provide sewer services and charge for those services based upon water consumption that is metered by a third party. UUC would not be able to ensure that the third party water supplier meters were accurately recording water consumption. Such a methodology would also result in increased costs due to the necessary accounting and billing interaction which UUC would have to have with the third party supplier. Additionally, Blue Ridge Water Company is an entity over which the Commission does not have jurisdiction. Therefore, in the event NGU contested its sewer rates based on the amount of consumed water, the Company and ORS would be unable to properly investigate the matter and the Commission would be unable to bring any meaningful resolution in the event a formal complaint was filed for their review.

1 **Q. ARE THERE ANY OTHER ISSUES WITH NGU WHICH WOULD CAUSE**
2 **PROBLEMS WITH THE METHODOLOGY PROPOSED BY MR. BARNWELL?**
3 **A.** Yes, there are. NGU has an on-site sewer collection system which they have
4 chosen to maintain and service. NGU has experienced problems with infiltration and
5 inflow, or I/I, in that system. I/I is the occurrence of storm water or ground water
6 entering into wastewater systems. This extraneous water enters the sanitary sewer system
7 in various ways including cracked pipes and leaking manholes. Once this storm water
8 enters the sanitary sewer it adds to the daily volume of wastewater that must be treated by
9 wastewater facilities. Because the collection system maintained by NGU has a history of
10 I/I problems, requiring UUC to base its sewer rates on supplied water would be
11 inaccurate. These I/I issues require UUC to treat water that never passes through NGU's
12 water meter. Using the method NGU proposes, UUC would be required to treat water for
13 which it would not be compensated. This, in turn, would result in costs of operation for
14 this one facility being placed upon the Company's other customers.
15
16 **Q. DO YOU HAVE ANY COMMENTS REGARDING MS. KING'S TESTIMONY?**
17 **A.** Yes. Similar to the issues raised by Mr. Barnwell, Ms. King testifies that the flat
18 fee arrangement does not reflect NGU's actual usage, in that it is charged the same rate
19 every month, regardless of whether any students, faculty or staff are on campus for a
20 portion of the month. Ms. King apparently has a basic misunderstanding of utility
21 services and facilities. Regardless of whether students are in session or not, the system
22 serving the NGU campus and surrounding area has to be designed to handle the

maximum amount of gallon flow peaks, even if normal flow is much less. We cannot downsize our wastewater treatment plant, or WWTP, because flows are low and then upsize the facilities to handle the flows during normal periods of use. We are required to meet those maximum flows at any time pursuant to Commission Regulation 103-553 which provides "[t]he capacity of the utility's plant for the collection, transmission, treatment and disposal of sewage, sewage effluent and other removed substances must be sufficiently large to meet all normal demands for service and provide a reasonable reserve for emergencies." Therefore, the utility is required to operate the system in a manner that will meet normal and emergency demand every day of the year. This causes UUC to continue to incur expenses even if the flow of wastewater is diminished during certain periods. If Ms. King's logic were accepted, then the Company would need to change to a higher rate on the days school is in session to cover our costs incurred when school is not in session. Such a variable rate design makes no sense in my opinion.

Q. HOW DOES UUC DETERMINE THE NUMBER OF SINGLE FAMILY EQUIVALENTS, OR SFE'S, FOR NGU?

A. DHEC regulations require that wastewater treatment facilities must use certain unit contributory loading guidelines to determine the average daily flow for proposed sewer systems. The facilities must then be designed to handle that level of capacity. Our rate schedule incorporates this regulation to establish SFE equivalent ratings. When NGU adds a new dormitory, UUC must assess its impact on the wastewater treatment system and the amount of wastewater that facility will introduce into the system. This is

measured by the number of SFE's and, to my knowledge, NGU has not formally disputed UUC's application of these SFE's.

Q. DOES NGU INFORM UUC WHEN IT EXPANDS ITS CAMPUS?

A. No, it does not. NGU has never notified UUC that it has added additional buildings and will have increased flow to the system. The Company generally learns of these new buildings from our operators sometime after their construction and will then apply the new level of SFE's.

Q. DO YOU NOTE ANY INACCURACIES IN MS. KING'S TESTIMONY?

A. Yes. Ms. King suggests in her testimony that NGU was initially being billed $2,165.75 for sewer services. This is quite misleading. As demonstrated on Ms. King's Exhibit A, the initial charges to NGU were related to "contract operations." After agreeing to take over operations of the system serving NGU, UUC filed an application with the Commission to expand its service area to include this territory. Pending the decision of the Commission, UUC agreed to operate the system on a contract basis. As a contract operator, UUC was not responsible for certain other expenses of operating the facility such as purchased power, sludge hauling, sampling, testing, etc. Once the Commission approved the expansion of UUC's service territory, UUC accepted full responsibility of the wastewater treatment facility. UUC then, in January 2002, began charging NGU for sewer services pursuant to its approved tariff. Therefore, for Ms. King to state that the increase proposed by UUC is 655.6% is erroneous.

Q. DO YOU HAVE ANY COMMENTS ON DR. EPTING'S AND MS. KING'S EXHIBITS WHICH COMPARE UUC'S RATES TO THAT OF WESTERN CAROLINA REGIONAL SEWER AUTHORITY?

A. Yes. Western Carolina Regional Sewer Authority, or Western Carolina, is a special purpose district that was established to provide sewer treatment service to various counties in the Upstate region. As this Commission is aware from the proceedings involving UUC and the Greenville County School District in Docket No. 2003-50-S, Western Carolina does not provide wastewater collection service. Rather, it only treats wastewater which is collected and transported to Western Carolina by other utilities. In addition to UUC, I am aware that the Metropolitan Sewer Sub-district is another utility in Greenville County which collects wastewater and transports it to Western Carolina for treatment. Of course, there is a fee charged for collection services. However, Ms. King's comparison of rates in her Exhibit "B" fails to account for this fee and is, therefore, not valid. And, as I have also stated in my previous rebuttal testimony, unlike local government entities and special purpose districts, UUC has no authority to impose liens on real property where sewer services have been provided but not paid for. Nor can UUC have assessments for sewer service collected with property taxes as do governmental utilities. Similarly, government utilities have lower debt costs than do investor owned public utilities such as UUC. Therefore, it is unreasonable to compare rates of a public entity with that of a private entity.

1 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL REBUTTAL TESTIMONY?**

2 **A.** Yes, it does.

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2006-107-W/S

IN RE: Application of United Utility Companies, Inc. for adjustment of rates and charges and modifications to certain terms and conditions for the provision of water and sewer service.	))))))))	**SUPPLEMENTAL REBUTTAL TESTIMONY OF LENA SUNARDIO**

1 **Q. ARE YOU THE SAME LENA SUNARDIO THAT HAS PREFILED DIRECT**
2 **TESTIMONY IN THIS CASE?**
3 **A.** Yes, I am.
4
5 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL REBUTTAL**
6 **TESTIMONY IN THIS PROCEEDING, MRS. SUNARDIO?**
7 **A.** The purpose of my supplemental rebuttal testimony is to respond on behalf of
8 United Utility Companies, Inc., or "UUC", to portions of the pre-filed direct testimony
9 of Dr. James Epting and Ms. Elaine King on behalf of North Greenville University, or
10 "NGU".
11
12 **Q. TO WHAT PORTIONS OF DR. EPTING'S TESTIMONY DO YOU WISH TO**
13 **RESPOND?**
14 **A.** I would first like to respond to Dr. Epting's assertion that a "double increase"
15 results from the requirement that NGU be billed for additional SFE's under UUC's

1 proposed rate schedule. Dr. Epting apparently contends that NGU is being doubly
2 burdened by UUC because the number of SFE's have increased and because of the
3 authorized rate increases. I would first respond by noting that the per unit cost to
4 provide sewer service has consistently risen over the past several years due to
5 increased regulatory requirements and increased cost in treating wastewater. As for
6 the increase in the number of SFE's, this simply reflects the fact that additional
7 housing and other facilities have been constructed by NGU which, in turn, require
8 additional service. UUC does not have the option of restricting NGU from adding
9 additional dormitories; rather, the Company is required to serve those facilities and
10 charge based upon our approved rate schedule. Since NGU has opted to build more
11 facilities and house more students and, therefore, increase its demand for service, it is
12 not being "doubly charged." It is simply being charged in accordance with our
13 authorized rate schedule for the increased impact that NGU has chosen to add to our
14 system.
15
16 **Q. DO YOU HAVE ANY COMMENTS ON DR. EPTING'S STATEMENTS THAT**
17 **THE UNIVERSITY CANNOT PASS THESE CHARGES ON TO ITS**
18 **STUDENTS?**
19 **A.** Yes. It is puzzling to me why Dr. Epting makes statements in his testimony
20 indicating that the University must hold down its tuition, room and board in order to
21 compete for students and therefore cannot pass along the sewer charges imposed by
22 UUC. Initially, I would respond that since UUC has been serving NGU as a customer,
23 NGU has increased its overall tuition levels $1,555 per semester or $3,110 per

1 academic year, as indicated in the brochures attached to my testimony as LS
2 Supplemental Rebuttal Exhibit 1. This is a 23.6% increase in the tuition at NGU from
3 2001-2006 which is significantly more than the 3%-5% increase that is "the maximum
4 increase [its] students can manage." More specifically, in this time period NGU has
5 increased its housing costs $260 per semester or $520 per year for a 26% increase.
6 Clearly, NGU has felt it appropriate to significantly increase the cost to its students as
7 it felt necessary. And, as Dr. Epting has stated, NGU has continued to see growth of
8 approximately 100 students per year which indicates that the increased costs have not
9 impaired NGU's ability to "compete for these students." It is disingenuous for Dr.
10 Epting to condemn UUC for trying to cover its increased costs while NGU has clearly
11 taken the same steps in its operations.
12
13 **Q. DO YOU BELIEVE THAT THE IMPACT IS AS DIRE AS DR. EPTING**
14 **SUGGESTS?**
15 **A.** No, I do not. Dr. Epting states that NGU's monthly sewer costs are currently
16 $12,011.76 per month, that this amount impacts tuition and housing and that it is a
17 negative number for profitability. Mr. Larry Barnwell, on behalf of NGU, testified
18 that the number of students and faculty currently living on campus is approximately
19 1107. This amount of NGU residents does not contemplate the additional 300 faculty
20 and staff, 550 commuter students, and the 3300 meals served per day. However,
21 assuming the sewer costs were to be born only by the NGU residents, this would
22 correlate to a monthly charge of $10.85 per NGU resident. The impact of the
23 requested rates per NGU resident results in an increase of $3.93. Considering NGU

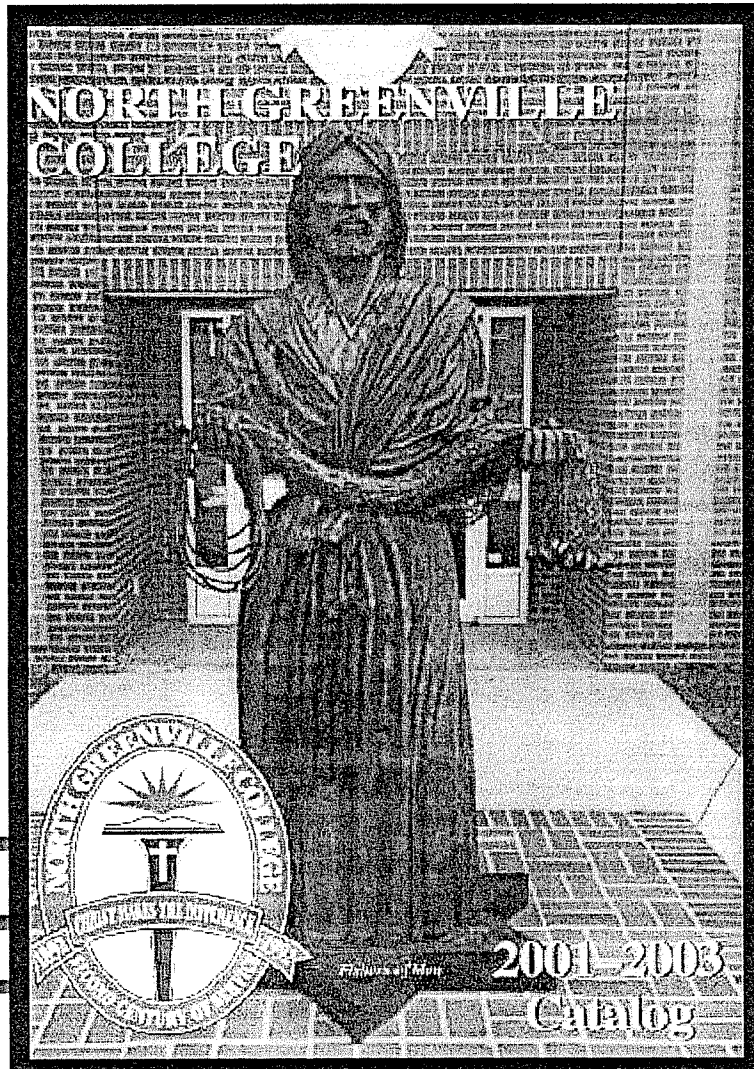
has increased its housing fees $520 per year, its total tuition amount has increased $3,110 per year and its endowment has increased $8 million dollars since 1991, it is unclear how a $3.93 increase per month per resident can negatively impact its profitability or result in cutting student scholarships as suggested by Ms. King.

Q. DO YOU HAVE ANY COMMENTS ON MS. KING'S TESTIMONY?

A. Yes, I do. Both Dr. Epting and Ms. King include as Exhibit B to their testimonies a comparison of rates that would be charged to NGU by Western Carolina Regional Sewer Authority, or Western Carolina. I believe that NGU's calculation of the rates that would be charged by Western Carolina is inaccurate. Both exhibits only apply the commercial rate of $3.81 per thousand charged to commercial customers by Western Carolina. However, as Mr. Haas notes, these exhibits fail to recognize the charges which would be imposed by a collection utility. Therefore, the comparison is invalid.

Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL REBUTTAL TESTIMONY?

A. Yes, it does.



North Greenville College

2001-2003 Catalog

CollegeSource

Visit Career Guidance Foundation at http://www.collegesource.org

LS Supplemental
Rebuttal Exhibit No. 1

FINANCIAL AFFAIRS

GENERAL EXPENSES: 2001-2002

Per Semester

Tuition:	1-6 hours (per hour)	$ 150.00
	7-11 hours (per hour)	$ 185.00
	12-19 hours (full time)	$ 4,100.00
	Over 19 hours (per hour)	$ 185.00
	Technology fee (resident student)	$ 100.00
	(commuting student)	$ 50.00
Housing		$1,090.00*
Meals (19 meals per week)		$ 1,305.00
Total (full-time resident student) (per semester)		$ 6,595.00

SPECIAL FEES (per semester unless noted)

Application fee	$ 25.00*
Art lab fee	$ 40.00
Auditing a course (per hour)	$ 75.00**
Automobile registration	$ 15.00
Bowling and Skiing	To Be Announced
Change of course	$ 10.00
Credit by exam (per hour)	$ 50.00
Diploma, Commencement Fee & Attire	$ 75.00
Exam for credit	$ 50.00
Failure to turn in key	$ 50.00
Independent Study late fee (per hour)	$ 150.00
Laboratory Fee (for science courses)	$ 40.00
Lost key	$ 35.00
Piano Lab	$ 80.00
Re-examination fee	$ 15.00
Transcript	$ 5.00***
Voice or instrumental (1/wk)	$ 165.00
Voice or instrumental (2/wk)	$ 280.00

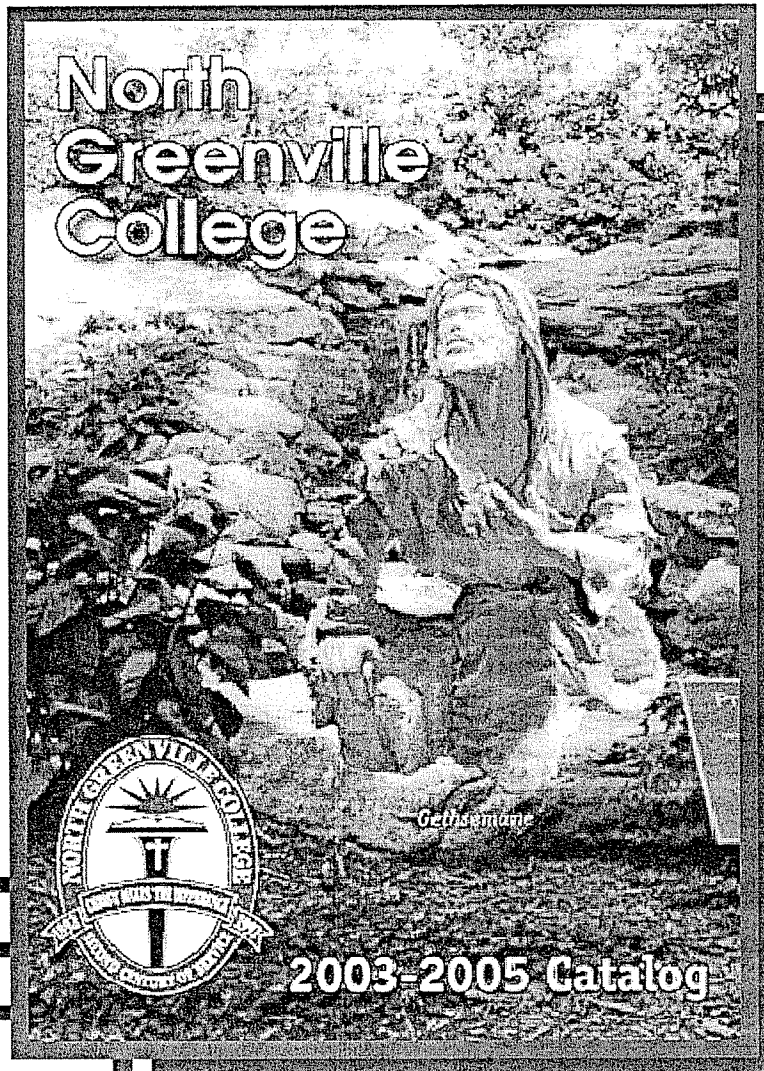
The college reserves the right to adjust fees to meet the current cost of operation should it become necessary.

* Additional $150 per semester for Emery, Horton/Tingle, Cline, J.&R. Howard, Anthony and Hartness Residence Halls.

** Skill courses such as music and art courses may not be audited but may be taken on a non-credit basis; the student pays the full tuition for the course.

*** One free official transcript will be provided for each semester of enrollment up to a maximum of two.

IN ADDITION TO THE FEES SHOWN ABOVE, STUDENTS WILL BE REQUIRED TO PURCHASE BOOKS TO BE USED IN CLASSES. COST OF BOOKS IS GENERALLY FROM $300 TO $350 EACH SEMESTER. SOME USED BOOKS ARE GENERALLY AVAILABLE FROM THE BOOKSTORE.



North Greenville College

2003-2005 Catalog

CollegeSource

Visit Career Guidance Foundation at http://www.collegesource.org

GENERAL EXPENSES: 2003-2004

Per Semester

Tuition:	1-6 hours (per hour)	$150.00
	7-11 hours (per hour)	$185.00
	12-19 hours (full time)	$4,550.00
	Over 19 hours (per hour)	$185.00
	Technology fee (resident student)	$100.00
	(commuting student)	$50.00
Housing	* $1,200.00	
Meals (19 meals per week)		$ 1,440.00
Total (full time resident student)(per semester)		$ 7190.00

Summer School Tuition

Per hour	$125.00
Summer School registration fee	$25.00
Summer School lab fee	$40.00
Summer School housing (per session)	$150.00

SPECIAL FEES (per semester unless noted)

Application fee	$ 25.00*
Art lab fee	$ 40.00
Auditing a course(per hour)	** $ 75.00
Automobile registration	$ 15.00
Bowling and Skiing	To Be Announced
Change of course	$ 10.00
Credit by exam (per hour)	$ 50.00
Diploma, Commencement Fee & Attire	$ 75.00
Exam for credit	$ 50.00
Failure to turn in key	$ 50.00
Independent Study late fee(per hour)	$ 150.00
Laboratory Fee(for science courses)	$ 40.00
Lost key	$ 35.00
Piano Lab	$ 80.00
Re-examination fee	$ 15.00
Transcript	***$ 5.00
Voice or instrumental (1/wk)	$ 165.00
Voice or instrumental (2/wk)	$ 280.00

The college reserves the right to adjust fees to meet the current cost of operation should it become necessary.

* additional $150 per semester for Emery, Horton/Tingle, Cline, J.&R.Howard, Anthony and Hartness residence halls.

** skill courses such as music and art courses may not be audited but may be taken on a non-credit basis; the student pays the full tuition for the course.

*** one free official transcript will be provided for each semester of enrollment up to a maximum of two.

IN ADDITION TO THE FEES SHOWN ABOVE, STUDENTS WILL BE REQUIRED TO PURCHASE BOOKS TO BE USED IN CLASSES. COST OF BOOKS IS GENERALLY FROM $400 - $450 EACH SEMESTER. SOME USED BOOKS ARE GENERALLY AVAILABLE FROM THE BOOKSTORE.

North Greenville College

2005-2007
Catalog

North Greenville College

2005-2007 Catalog

CollegeSource

Visit the CollegeSource Online website at http://www.collegesource.org

GENERAL EXPENSES: 2005-2006

Per Semester

Tuition:	1-11 hours (per hour)	$200.00
	12-19 hours(full time)	$5,175.00
	Over 19 hours (per hour)	$200.00
Housing	*	$1,350.00
Meals (20 meals per week)		$1,625.00
Total (full time resident student)(per semester)		$8,150.00
Summer School Tuition		
Per hour		$175.00
Summer School registration fee		$25.00
Summer School lab fee		$50.00
Summer School housing (per session)		$185.00

SPECIAL FEES (per semester unless noted)

Application fee	$25.00*
Art lab fee	$50.00
Auditing a course(per hour)	$75.00
Automobile registration	$15.00
Bowling and Skiing	To Be Announced
Change of course	$10.00
Credit by exam (per hour)	$50.00
Diploma, Commencement Fee & Attire	$75.00
Exam for credit	$50.00
Failure to turn in key	$50.00
Independent Study late fee(per hour)	$150.00
Laboratory Fee(for science courses)	$50.00
Lost key	$35.00
Piano Lab	$90.00
Re-examination fee	$15.00
Transcript	***$5.00
Voice or instrumental (1/wk)	$180.00
Voice or instrumental (2/wk)	$295.00

The college reserves the right to adjust fees to meet the current cost of operation should it become necessary.

* Additional $150 per semester for Emery, Horton/Tingle, Cline, J.&R.Howard, Anthony, Hartness, Roberson and Vandiver Residence Halls.

** Skill courses such as music and art courses may not be audited but may be taken on a non-credit basis; the student pays the full tuition for the course.

*** One free official transcript will be provided for each semester of enrollment up to a maximum of two.

IN ADDITION TO THE FEES SHOWN ABOVE, STUDENTS WILL BE REQUIRED TO PURCHASE BOOKS TO BE USED IN CLASSES. COST OF BOOKS IS GENERALLY FROM $500 - $550 EACH SEMESTER. SOME USED BOOKS ARE GENERALLY AVAILABLE FROM THE BOOKSTORE.

Contingency Fund Deposit

All students are required to pay a contingency deposit of $100. This deposit is retained by the college as long as the student is enrolled. The fee, less any unpaid charges for damages or fines assessed to the student, will be refunded 90 days following graduation or official and permanent withdrawal from the college. **The fee is forfeited if a student moves out of housing during a semester without checking out properly.**

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2006-107-WS

IN RE:	)	
	)	
Application of United Utility Companies, Inc. for adjustment of rates and charges and modifications to certain terms and conditions for the provision of water and sewer service.	)	**CERTIFICATE OF SERVICE**

This is to certify that I have caused to be served this day one (1) copy of the **Rebuttal Testimony of Bruce T. Hass, III and the Rebuttal Testimony and supporting exhibit of Lena Sunardio** via electronic mail and hand-delivery, upon the persons named below at the addresses set forth:

RECEIVED
2006 AUG -8 PM 4: 03
SC PUBLIC SERVICE COMMISSION

Shannon B. Hudson, Esquire
Nanette S. Edwards, Esquire
Office of Regulatory Staff
1441 Main Street, 3rd Floor
Columbia, South Carolina 29201
Email addresses: shudson@regstaff.sc.gov
nsedwar@regstaff.sc.gov

This is to further certify that I have caused to be served this day one (1) copy of the **Rebuttal Testimony of Bruce T. Hass, III and the Rebuttal Testimony and supporting exhibit of Lena Sunardio** via electronic mail and by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto, upon the persons named below at the addresses set forth:

Jacqueline H. Patterson, Esquire
Patterson & Coker, PA
1225 South Church Street
Greenville, South Carolina 29605
Email address: pattersonlaw@charter.net

George K. Lyall, Esquire
Law Offices of George K. Lyall
4573 Coach Hill Dr.
Greenville, SC 29615
Email address: georgelyall@charter.net

This is to further certify that I have caused to be served this day one (1) copy of the **Rebuttal Testimony of Bruce T. Hass, III and the Rebuttal Testimony and supporting exhibit of Lena Sunardio** via electronic mail, facsimile, and by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto, upon the persons named below at the addresses set forth:

Duke K. McCall, Jr., Esquire
Leatherwood Walker, Todd & Mann, PC
Post Office Box 87
Greenville, South Carolina 29602
Facsimile number: 864-240-2474
Email address: dmccall@lwtm.com

Andrea M Wright
Andrea M. Wright

Columbia, South Carolina
This 8th day of August, 2006.