RECEIVED
2012 OCT 25 PM 2:49
SC PUBLIC SERVICE COMMISSION

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2012-94-S

IN RE: Application of Palmetto Wastewater Reclamation LLC d/b/a Alpine Utilities for adjustment of rates and charges for, and modification to certain terms and conditions related to the provision of sewer service.	**DIRECT TESTIMONY OF MARION F. SADLER, JR.**

Q. WOULD YOU PLEASE STATE YOUR FULL NAME AND PRESENT POSITION?

A. My name is Marion F. Sadler, Jr. I am retired from the South Carolina Department of Health and Environmental Control, or "DHEC," and provide environmental and utility consulting services in the State of South Carolina as a sole proprietorship that does business as "Sadler Environmental Assistance."

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. I received a Bachelor of Science degree in Mechanical Engineering from Clemson University in 1971. I received a Master of Engineering degree in Environmental Systems Engineering, also from Clemson University, in 1981.

1 **Q. HOW LONG DID YOU WORK AT DHEC?**

2 **A.** I worked at DHEC and one of its predecessor agencies for my entire
3 career, which was approximately 34 ½ years.

4

5 **Q. WOULD YOU PLEASE DESCRIBE YOUR WORK EXPERIENCE?**

6 A. Yes. I began working with the South Carolina Board of Health as an
7 Environmental Engineer Associate in July, 1971. In this capacity I was the
8 District Director in the Lower Savannah District Office, which covered
9 Orangeburg, Bamberg, and Calhoun Counties, where I was responsible for the
10 field work of the water supply, domestic wastewater, and swimming pool
11 programs.

12 In 1972, I transferred to the Domestic Wastewater Division in the main
13 Columbia office, where I was a plan reviewer of private wastewater collection
14 and treatment systems throughout South Carolina.

15 In 1973, the South Carolina Pollution Control Authority, or "PCA," was
16 merged with the Board of Health and the combined agencies were re-formed as
17 DHEC. As a result of that restructuring, I became District Director of the Central
18 Midlands Environmental Quality Control District Office, which covered
19 Richland, Lexington, Newberry, & Fairfield Counties. In this capacity I was
20 responsible for the field work of the water supply, wastewater, and swimming
21 pool programs.

22 In August of 1974, I became Section Manager of the Community Section
23 of the Domestic Wastewater Division, Bureau of Water Pollution Control for

DHEC. In this capacity I was responsible for permitting activities of domestic wastewater collection and treatment systems throughout the State of South Carolina, except for those owned by municipalities, counties, the federal government, and industries. In this position I supervised up to five (5) plan reviewers and was responsible for administering and developing the statewide program through regulations, program guidance memorandums, etc. I played a key role in the adoption of these items into SC Regulation 61-67, Standards for Wastewater Facility Construction. Also, I was involved in the development and promulgation of SC Regulation 61-82, Proper Closeout of Wastewater Treatment Facilities. In this capacity, I conducted numerous public hearings and testified in proceedings before courts and administrative bodies. During this time, I also testified in rate relief hearings before the Public Service Commission of South Carolina.

In September of 1991, I became Director of the Industrial, Storm Water, and Agricultural Permitting Division, which position I held until my retirement from DHEC in 2005. In that capacity I was responsible for the permitting activities of entities involved in the treatment or discharge of industrial wastewater, which included land appliers, direct dischargers, and pretreaters of non-domestic wastewater. The Storm Water Program I oversaw involved three separate permitting programs: the Industrial, Construction, and Municipal Separate Storm Sewer Systems (MS4s) program; the Agricultural program; and the Dams and Reservoirs Permitting program. In this position I supervised up to twenty six (26) staff members in four (4) sections and was responsible for

1 administering and developing these statewide programs through regulations,
2 program guidance memorandums, etc. I was also responsible for implementation
3 of the Federal National Pollutant Discharge Elimination Systems, or "NPDES,"
4 component of these three state programs and I interfaced with the Federal agency
5 charged with administering the NPDES program, the Environmental Protection
6 Agency, or "EPA," in its oversight role. Further, I led and assisted in the
7 development of regulations for these programs. I conducted public hearings,
8 testified in court proceedings, made presentations to various concerned
9 organizations, updated state regulations, and appeared before legislative
10 committees on various issues. I also developed web pages and guidance
11 documents for the program areas under my responsibility.
12
13 **Q. WOULD YOU PLEASE DESCRIBE THE CONSULTING WORK YOU**
14 **HAVE BEEN DOING SINCE YOU RETIRED FROM DHEC?**
15 A. Yes. I have worked with both governmental and private entities on
16 environmental issues such as wastewater permit applications to DHEC, stream
17 buffer ordinances, and NPDES permit matters. Most recently I have been
18 retained to provide consulting services in connection with the application of
19 Palmetto Wastewater Reclamation LLC, or "PWR," to this Commission for rate
20 relief for the Alpine sewer system that it operates.
21
22 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
23 **PROCEEDING?**

A. The purpose of my testimony is to describe the services I have performed relative to the proposed modification to the provisions of the PWR rate schedule to set commercial customer rates based on equivalencies to residential customers and to support its adoption by the Commission.

Q. WOULD YOU PLEASE DESCRIBE THE SERVICES YOU PROVIDED IN CONNECTION WITH THIS CASE?

A. Yes. I was retained to analyze PWR's current commercial customer rate structure and to assist it in conducting a field survey of the commercial customers served by the Alpine sewer system. The primary purpose of the survey was to determine the type, size, and scope of the business conducted by each commercial customer. It was necessary to perform this survey to ascertain whether PWR should make a transition from its current commercial customer rate structure, that is partially based upon a PCA regulation that established wastewater loading guidelines using biochemical oxygen demand, or "BOD," to a commercial customer equivalency rating system that is consistent with the Unit Contributory Loading Guidelines set out in Appendix "A" of DHEC Regulation 61-67, which are based solely upon hydraulic flow and have been recognized by this Commission in rate designs for a number of public utilities providing wastewater service. Using the findings of the survey, the Company was able to determine the hydraulic loading factors applicable to each type of commercial customer under Appendix "A" of DHEC Regulation 61-67. The survey process also allowed the Company to identify commercial premises connected to the Alpine system which

1 did not have customer accounts established with the Company, verify existing
2 business names and confirm the nature of the business being conducted at
3 customer premises, and to cross check commercial customer locations against the
4 Company's billing records.
5
6 **Q. WOULD YOU PLEASE DISCUSS YOUR PREVIOUS SPECIFIC**
7 **KNOWLEDGE OR EXPERIENCE THAT QUALIFIED YOU TO**
8 **PROVIDE THE CONSULTING SERVICES IN THIS MATTER THAT**
9 **YOU HAVE DESCRIBED?**
10 A. Yes. My knowledge and experience in this regard is both personal and
11 professional. When I was employed in the Community Section of the Domestic
12 Wastewater Division of DHEC, I was involved in the permitting of the Alpine
13 Utilities wastewater treatment system and collection systems from the time it was
14 built in the early 1970s. This involvement with the system lasted until I
15 transferred to the Industrial, Agricultural, and Stormwater Permitting Division in
16 1991. When Alpine Utilities was in the process of applying to the Public Service
17 Commission for approval of rates, including rates for commercial customers, I
18 was tasked with calculating the Five-Day BOD (BOD_5) factors for the different
19 types of establishments listed in the PCA's Unit Contributory Loadings guidance
20 document. These factors were used in discussions between the agency and Mr.
21 Donald Dial, the then President of Alpine Utilities, regarding the proposed rate
22 structure for Alpine Utilities. The BOD factors would adjust the monthly service
23 rates for commercial establishments based on flow and BOD loading (strength) of

their wastewater in relation to typical residential domestic wastewater. As the Commission is aware, it approved a commercial rate design for Alpine Utilities based upon the BOD_5 factors in its Order Number 18,862 issued December 5, 1975.

When I worked in the Domestic Wastewater Division, I used the Unit Contributory Loading Guidelines (that later were adopted into DHEC Regulation 61-67) for 18 years on a routine basis. Being responsible for the statewide permitting of all private wastewater systems, I personally reviewed and/or supervised the personnel who reviewed all of the wastewater plans that were submitted to DHEC for approval by Alpine Utilities' professional engineers on its behalf.

Also, since 1971 I have lived in the St. Andrews area where the Alpine service area is located. Because of this, I have patronized many of the commercial establishments in the area over the years. Therefore, I am very familiar with the service area and many of Alpine's customers on a professional and personal basis.

Finally, as Section Manager of the Community Section from 1974 to 1991, I have testified before the Public Service Commission on numerous rate hearings for investor-owned wastewater utilities, including Alpine Utilities, with respect to the utilities' overall operation and maintenance of their wastewater systems and compliance with their NPDES Permits issued by DHEC.

Q. WOULD YOU PLEASE EXPLAIN HOW THE UNIT CONTRIBUTORY GUIDELINES IN APPENDIX "A" TO REGULATION 61-67 WERE DEVELOPED AND HOW THEY ARE CURRENTLY USED?

A. Yes. To understand this, I think it is important to first understand some of the background regarding the original Unit Contributory Loading Guidelines. The staff of the PCA developed the original Unit Contributory Loading Guidelines from a review it performed of wastewater text/reference books commonly used in the wastewater engineering and science field. From this review, the typical hydraulic (flow) loadings and organic (BOD_5) loadings listed in the text books were established by the PCA staff for different types of commercial and industrial establishments, residential projects, schools, etc. These typical textbook loading factors were published in the early 1970s by the PCA as a guidance document for use by consulting engineers and their staff. The staff of the Board of Health, which included me and my staff, also utilized this document in our work since both agencies were required by state law to issue wastewater construction permits for proposed subdivisions with 250 or more lots. After the merger of these two agencies to form DHEC, the guidance document with both the hydraulic and organic loading rates was included in DHEC Regulation 61-67. Since then, DHEC has amended its Regulation 61-67 by removing the organic loading factor from the Unit Contributory Loadings given in Appendix "A" to the regulation. Copies of the original Unit Contributory Loading Guidelines developed by the PCA and the current guidelines contained in Appendix "A" to

DHEC Regulation 61-67 are attached to my testimony as Exhibits MFS-1 and MFS-2, respectively.

Q. IN YOUR OPINION, IS IT APPROPRIATE FROM AN ENGINEERING AND REGULATORY VIEWPOINT TO ELIMINATE THE BOD_5 FACTOR FROM THE RATE DESIGN CURRENTLY APPLIED TO PWR'S COMMERCIAL CUSTOMERS AND RELY UPON FLOW ALONE TO DETERMINE THE EQUIVALENCIES USED TO DETERMINE THEIR MONTHLY RATES?

A. Yes, it is.

Q. WOULD YOU PLEASE EXPLAIN THE BASIS FOR YOUR OPINION IN THIS REGARD?

A. Yes. I think it is appropriate for several reasons. First, the fact that DHEC has seen fit to modify the regulation so as to eliminate BOD_5 as a loading factor for wastewater treatment facilities means that the current rates for PWR commercial customers are based on engineering and regulatory guidelines that are no longer in force. I believe that consistency between pertinent regulations and the Company's rate schedule is desirable.

Second, since it has been owned by PWR, the Alpine system has been subjected to an aggressive program designed to prevent fats, oils, and grease from entering the system. The removal of these pollutants lowers the BOD of the wastewater from commercial establishments, primarily restaurants, that have

traditionally had more grease in their wastewater than they do today. Therefore, the BOD loading of these establishments is less today than the "text book" values established in the original Unit Contributory Loading Guidelines established by the PCA. The information on BOD loading rates in the original PCA guidelines is over 35 years old and that was likely a contributing factor in DHEC's decision to eliminate BOD in the guidelines in current Appendix "A" to Regulation 61-67.

Also, as time has passed, the nature of commercial customers in the Alpine service area has changed such that they may not readily correspond to the types of establishment types found in the current rate schedule, which was based on the original loading guidelines promulgated by the PCA. This leads to uncertainty with respect to the BOD factor used in the default commercial rate calculation contained in the existing rate schedule that must be used for unspecified types of commercial customers. To resolve this uncertainty, judgments must be made with respect to the BOD loading factor that should be used. These judgments are, by nature, somewhat subjective and will most likely vary over time depending on the person making them. Therefore, as time goes by, these situations can lead to inconsistent rates for certain types of similarly situated commercial customers.

Finally, I am aware that most of the investor-owned wastewater utilities regulated by this Commission that have commercial customer rates designs employing equivalencies to residential customer rates, which would include PWR's sister subsidiary Palmetto Utilities, Inc., have used flow alone as the basis for commercial customer rates with no consideration of the BOD factor.

Therefore, using only the hydraulic loading factor for determining commercial customers rate equivalencies will bring PWR's Alpine customer rate structure into line with most, if not all, of the public utilities providing wastewater service pursuant to rates authorized by the Commission.

Q. DID YOU PARTICIPATE IN THE SURVEY OF COMMERCIAL CUSTOMERS THAT YOU MENTIONED?

A. Yes, I did.

Q. WOULD YOU PLEASE PROVIDE THE DETAILS OF HOW THE COMMERCIAL CUSTOMER SURVEY WAS CONDUCTED?

A. Yes. The survey involved three separate phases. The first phase dealt with preparing for the actual field work. This commenced with PWR providing to me an electronic file containing a list of all commercial customers served by the Alpine system which included the name of the establishments and service addresses. The file listed restaurants and all other commercial customers separately. Also during the first phase, PWR developed two forms for use by the field survey team when conducting the physical inspection of commercial customer premises. One form was a "Commercial Customer Inspection Checklist" which was designed to capture basic customer information and document the particulars of the inspection. This form was also used to record the type of commercial establishment maintained by the customer and to capture information regarding the hydraulic loading factors from Appendix "A" of SC Regulation 61-

67 applicable to the type of establishment, grease trap and satellite sewer information where applicable, and any other pertinent information. A copy of this form is attached to my testimony as Exhibit MFS-3. The other form was a "Shopping Center Supplemental Inspection Checklist" developed for use when the commercial customer location was a shopping center with multiple tenants. This form was used to record the shopping center name, location address, exterior square footage, number of separate units in the shopping center, names of tenants/stores and tenant contact information, tenant establishment type, hydraulic loading factors from Appendix "A" of SC Regulation 61-67 based on the type of establishment, and outparcel information. A copy of this form is attached to my testimony as Exhibit MFS-4.

Also during the first phase, PWR developed a letter of introduction for the field survey team members to provide to commercial customers so that they would understand the nature of the survey and associated inspection. The letter asked for the cooperation of the commercial customers with the company representatives. At the same time PWR developed an information sheet on the right of access accorded public utilities under Commission regulations to inspect customer premises which could be provided to any customer that was hesitant to allow the inspection. Copies of both of these documents are attached to my testimony as Exhibits MFS-5 and MFS-6, respectively. All field survey team members were provided with utility contractor identification cards, which included photographs, to clearly and readily identify them as such to customers.

The last step in the first phase of the survey was to sort the electronic file of commercial customer locations by street number plus street so that the commercial customer location inspections could be conducted as efficiently as possible. The list of commercial customers was then divided up into three (3) parts to be assigned to the members of the field survey team.

The second phase of the survey was to conduct the actual inspections of, and gather information regarding, the commercial customer locations. The field survey team consisted of eight people which included Mr. Rick Melcher, Manager of Public Relations for Ni America Operating LLC, Mr. Tim Thornton, an inspector employed by Ni America Operating LLC in the grease removal and reduction program, five persons who provided contract services for the field survey project, and me. Prior to the field survey and inspections, PWR conducted a training session for all of the survey team members to explain how the survey and inspections were to be conducted; to instruct them in the use of the two inspection forms I described; to educate them with respect to the Unit Contributory Loadings in Appendix "A" of Regulation 61-67; and to describe to them how to apply the equivalency loading factors under Appendix "A" to Regulation 61-67 to commercial customers when filling out the inspection forms. The survey team members were instructed to be courteous, considerate of commercial customer representatives participating in the survey with respect to the time required of them and the operation of their businesses, and to conduct themselves in a professional manner. Also, a digital camera was provided to each

team to take pictures of the exterior and interior of the commercial customer premises if this was agreeable to the customer.

Three field teams of two people each were established. Mr. Melcher and I supervised the field surveys from a central location in the service area that was rented for that purpose. Meetings of the field survey teams were held in the morning each day prior to commencing inspections and at the end of each day when the completed survey forms were turned in and any issues that arose during the day were discussed. I also reviewed the completed surveys to make sure all necessary information had been obtained. If there were any questions on a completed survey it was discussed with the applicable team member and, if necessary, a follow-up inspection or telephone call to the commercial customer premises was made to resolve the question.

The commercial customer premises consisting of restaurants were inspected during the week of April 2 to April 6, 2012 by Mr. Melcher, Mr. Thornton and me. The remaining commercial customer premises were inspected by the other field survey team members on April 19 and 20, 2012, and during the week of April 23 to April 27, 2012. Additional follow-up inspections were made over the next two weeks on an as needed basis.

The third phase of the survey project involved the assimilation of the inspection and field survey results documentation and analysis of the information obtained. After the completion of all inspections, the completed forms were provided to PWR for its evaluation and use in developing a proposed rate design for commercial customers based upon equivalency ratings using hydraulic flows

consistent with Appendix "A" to DHEC Regulation 61-67. Single Family Equivalent (SFE) ratings were also calculated for each commercial customer using the loading guideline factors set out in Appendix "A" to Regulation 61-67.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

SCPCA-WDG-4

GUIDELINES
for
UNIT CONTRIBUTORY LOADINGS
to
WASTEWATER TREATMENT FACILITIES

WATER POLLUTION CONTROL DIVISION

South Carolina

Pollution Control Authority

1972

SCPCA-WDG-4

SOUTH CAROLINA POLLUTION CONTROL AUTHORITY

Water Pollution Control Division

Guidelines for

Unit Contributory Loadings to Wastewater Treatment Facilities

The following are guidelines for the *minimum* design loadings for waste treatment facilities. These guidelines will be used by the South Carolina Pollution Control Authority in evaluating proposed facilities.

Type of Establishment	*Gallons Per Day Per Person*	*Lbs. 5-Day BOD Per Day Per Person*
Airport — Each Employee	10	.06
— Each Passenger	5	.02
Apartments — 3 Bedroom 4 Persons Each	100	.17
— 2 Bedroom 3 Persons Each	100	.17
— 1 Bedroom 2 Persons Each	100	.17
— With Garbage Disposal Units	100	.23
Bars — Each Employee	10	.06
— Each Seat (Excluding Restaurant)	40	.01
Boarding House — Resident	50	.10
Bowling Alley — Per Lane (No Restaurant)	125	.20
— Additional For Bars and Cocktail Lounges	3	.02
Camps — Resort (Luxury)	100	.17
— Summer	50	.12
— Day (With Central Bathhouse)	35	.10
— Per Travel Trailer Site	175	.28
Churches — Per Seat	3	.02
Clinics — Per Staff	15	.03
— Per Patient	5	.02
Country Club — Each Member	50	.10
Factories — Each Employee (No Showers)	25	.06
— Each Employee (With Showers)	35	.08
— Each Employee (With Kitchen Facilities)	40	.10
Fairgrounds — Average Attendance	5	.03
Food Service Operations —		
Ordinary Restaurant (Not 24 Hours) (Per Seat)	70	.20
24-Hour Restaurant (Per Seat)	100	.30
Curb Service (Drive-in) (Per Car Space)	100	.20
Vending Machine Restaurant	70	.12

Type of Establishment	*Gallons Per Day Per Person*	*Lbs. 5-Day BOD Per Day Per Person*
Hospitals — Per Bed	200	.30
— Per Resident Staff	100	.17
Hotels — Per Bedroom (No Restaurant)	100	.17
Institutions — Per Resident	100	.17
Laundries — Self Service — Per Machine	400	.68
Mobile Homes — 3 Persons Each	100	.17
Motels — Per Unit (No Restaurant)	100	.17
Nursing Homes — Per Bed (No Laundry)	100	.17
— Per Bed (With Laundry)	150	.20
Offices — Per Person (No Restaurant)	25	.05
Picnic Parks — Average Attendance	10	.06
Residences — 4 Persons Each	100	.17
— With Garbage Disposal Units	100	.23
Rest Homes — Per Bed (No Laundry)	100	.17
— Per Bed (With Laundry)	150	.20
Schools — Per Person (No Showers, Gym, Cafeteria)	10	.04
— Per Person With Cafeteria (No Gym, Showers)	15	.05
— Per Person With Cafeteria, Gym & Showers	20	.06
Service Stations — Each Car Served	10	.06
— Each Car Washed	75	.03
— First Bay (Per Day)	1000	2.0
— Each Additional Bay (Per Day)	500	1.0
Shopping Centers — Per 1,000 Sq. Ft. Space (No Restaurant)	200	.40
Stadiums — Per Seat (No Restaurant)	2	.008
Swimming Pools — Per Person (With Sanitary Facilities and Showers)	10	.04
Theatres — Drive-In — Stall	5	.03
— Indoor — Seat	5	.03

Any major deviation from the above guidelines should be so noted and substantiated by the Engineer in the project report.

DHEC Regulation 61-67, Appendix A

Unit Contributory Loadings to All Domestic Wastewater Treatment Facilities

Type of Establishment			Hydraulic Loading (GPD)
A.	Airport:		
	1.	Per Employee	10
	2.	Per Passenger	5
B.	Apartments, Condominiums, Patio Homes:		
	1.	Three (3) Bedrooms (Per Unit)	400
	2.	Two (2) Bedrooms (Per Unit)	300
	3.	One (1) Bedroom (Per Unit)	200
C.	Assembly Halls: (Per Seat)		5
D.	Barber Shop:		
	1.	Per Employee	10
	2.	Per Chair	100
E.	Bars, Taverns:		
	1.	Per Employee	10
	2.	Per Seat, Excluding Restaurant	40
F.	Beauty Shop:		
	1.	Per Employee	10
	2.	Per Chair	125
G.	Boarding House, Dormitory: (Per Resident)		50
H.	Bowling Alley:		
	1.	Per Employee	10
	2.	Per Lane, No Restaurant, Bar or Lounge	125
I.	Camps:		
	1.	Resort, Luxury (Per Person)	100
	2.	Summer (Per Person)	50
	3.	Day, with Central Bathhouse (Per Person)	35
	4.	Travel Trailer (Per Site)	175
J.	Car Wash: (Per Car Washed)		75
K.	Churches: (Per Seat)		3
L.	Clinics, Doctor's Office:		
	1.	Per Employee	15
	2.	Per Patient	5
M.	Country Club, Fitness Center, Spa: (Per Member)		50
N.	Dentist Office:		
	1.	Per Employee	15
	2.	Per Chair	8
	3.	Per Suction Unit; Standard Unit	370
	4.	Per Suction Unit; Recycling Unit	95
	5.	Per Suction Unit; Air Generated Unit	0
O.	Factories, Industries:		
	1.	Per Employee	25
	2.	Per Employee, with Showers	35
	3.	Per Employee, with Kitchen	40
	4.	Per Employee, with Showers and Kitchen	45
P.	Fairgrounds: (Average Attendance, Per Person)		5
Q.	Grocery Stores: (Per one thousand (1,000) Square Feet, No Restaurant)		200
R.	Hospitals:		
	1.	Per Resident Staff	100
	2.	Per Bed	200
S.	Hotels: (Per Bedroom, No Restaurant)		100
T.	Institutions: (Per Resident)		100
U.	Laundries: (Self Service, Per Machine)		400
V.	Marinas: (Per Slip)		30
W.	Mobile Homes: (Per Unit)		300
X.	Motels: (Per Unit, No Restaurant)		100
Y.	Nursing Homes:		
	1.	Per Bed	100
	2.	Per Bed, with Laundry	150
Z.	Offices, Small Stores, Business, Administration Buildings: (Per Person, No Restaurant)		25
AA.	Picnic Parks: (Average Attendance, Per Person)		10
BB.	Prison/Jail:		
	1.	Per Employee	15
	2.	Per Inmate	125
CC.	Residences: (Per House, Unit)		400

DD.	Rest Areas, Welcome Centers:		
	1.	Per Person	5
	2.	Per Person, with Showers	10
EE.	Rest Homes:		
	1.	Per Bed	100
	2.	Per Bed, with Laundry	150
FF.	Restaurants:		
	1.	Fast Food Type, Not Twenty Four (24) Hours (Per Seat)	40
	2.	Twenty Four (24) Hour Restaurant (Per Seat)	70
	3.	Drive-In (Per Car Served)	40
	4.	Vending Machine, Walk-up Deli (Per Person)	40
GG.	Schools, Day Care:		
	1.	Per Person	10
	2.	Per Person, with Cafeteria	15
	3.	Per Person, with Cafeteria, Gym and Showers	20
HH.	Service Stations:		
	1.	Per Employee	10
	2.	Per Car Served	10
	3.	Car Wash (Per Car Washed)	75
II.	Shopping Centers, Large Department Stores, Malls: (Per one thousand (1,000) Square Feet, No Restaurant)		200
JJ.	Stadiums, Coliseums: (Per Seat, No Restaurant)		5
KK.	Swimming Pools: (Per Person, with Sewer Facilities and Showers)		10
LL.	Theaters: Indoor (Per Seat), Drive In (Per Stall)		5

ALPINE UTILITIES COMMERCIAL CUSTOMER INSPECTION CHECKLIST

Customer Name: _____ Telephone Number: _____

Service Address: _____

_____

Name of Customer Representative Interviewed And Position:

_____ (Name) _____ (Title)

Type of Establishment: _____ (Insert here alphabetic designation from list of establishments in Appendix A of R.61-67, A - LL, that best describes establishment. If more than one designation applies, or no designation applies, so note in next space.)

Notes: _____

_____

Equivalency Factors: (Insert here hydraulic loading factors from Appendix A of R. 61-67 applicable to type of establishment; if more than one designation applies, provide factors for each designation.)

_____

_____

GREASE TRAPS

Grease Trap Present? Y / N (circle one) (If yes, note location at customer service premises: _____.)

Grease Trap Required? Y / N (circle one) (Where a grease trap is required, provide customer with a copy of the Alpine Fats, Oils and Grease standards.)

Grease Trap Condition: _____ (Insert here "poor, fair or good.")

Last pump date: _____

Grease Trap Comply with Alpine construction standards? Y / N (circle one)

Waste Oil Recycling at customer premises: Y / N

SATELLITE SEWERS

Satellite Sewer System Present? Y / N

Connection description: _____

(For example, customer sanitary sewer collection system, stormwater, roof drain, sump pump, etc.)

Authorized connection: Y / N

System and Connection Condition: _____ Insert here "poor, fair or good.")

Observed System or Connection Deficiencies: (Describe here any problems with connection or system.)

_____

_____

OTHER

Note here any other observations, questions or issues arising out inspection, including customer questions or comments.

_____

_____

REVIEWED: (Insert reviewer initials and date for each)

Operations: _____ Regulatory: _____

Accounting: _____ PR: _____

CUSTOMER REQUESTED / PROVIDED COPY: Y/N

ALPINE UTILITIES SHOPPING CENTER SUPPLEMENTAL INSPECTION CHECKLIST

Shopping Center Name: _____

Location Address: _____
_____
_____

Exterior Square Footage: _____ Measurement Method: _____ (Measuring wheel, tape, customer supplied, building records, tax records, etc.)

Number of Separate Units in Shopping Center: _____

Names of tenants/stores:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____

(If more than 8 separate tenants, attach separate sheet)

Tenant Contact Information:

_____
_____
_____
_____
_____
_____
_____
_____

(If more than 8 separate tenants, attach separate sheet)

Tenant Type of Establishment:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____

(Insert here alphabetic designation from list of establishments in Appendix A of R.61-67, A - LL, that best describes establishment. If more than one designation applies, or no designation applies, so note in next space.)

(If more than 8 separate tenants, attach separate sheet)

Equivalency Factors:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____

(Insert here hydraulic loading factors from Appendix A of R. 61-67 applicable to type of tenant establishment; if more than one alphabetic designation applies, provide factors for each designation.)

(If more than 8 separate tenants, attach separate sheet)

Outparcel buildings on site? Y / N (circle one)

If yes, list all outparcel buildings by occupant name and confirm separate inspection performed by checking space below.

_____ Separate inspection _____
_____ Separate inspection _____
_____ Separate inspection _____
_____ Separate inspection _____

REVIEWED: (Insert reviewer initials and date.)

Operations: _____ Regulatory: _____

Accounting: _____ PR: _____

CUSTOMER REQUESTED / PROVIDED COPY: Y / N

Palmetto Wastewater Reclamation
Alpine and Woodland Utilities
1710 Woodcreek Farms Road
Elgin, SC 29045
803-699-2422

April 2, 2012

Dear Customer:

As your wastewater utility, Palmetto Wastewater Reclamation, LLC-Alpine Utilities is conducting an inspection of your sewerage connections and premises for purposes of its upcoming rate relief proceeding before the Public Service Commission of South Carolina and ascertaining the applicability of and compliance with certain of our regulations and policies pertaining to commercial customer service locations.

The person bearing this letter is a duly authorized representative of Palmetto Wastewater Reclamation, LLC-Alpine Utilities and is authorized to inspect your premises under Public Service Commission regulation 103-537. We ask that you cooperate with our representative during this inspection, including providing information that may be requested.

We very much appreciate your cooperation in this matter. Should you have any questions or need additional information, please do not hesitate to contact me at the telephone number or email address shown below.

Sincerely,

Rick Melcher
Manager, Public Relations
(979) 319-0966
rmelcher@niamerica.com

CHAPTER 103.

PUBLIC SERVICE COMMISSION

(Statutory Authority: 1976 Code Sections 58-3-140, 58-23-10, 58-23-590, 58-23-1010, and 58-23-1830)

103-537. Right of Access.

A. The authorized agents of the utility shall have the right of access to the customer's premises, at reasonable hours, for the purpose of inspecting the customer's sewerage connections and for any other purpose which is proper and necessary in the conduct of the utility's business.

B. When a sewerage line which is property of a utility is on the property of a resident in the utility's service area which is on file with the ORS, the resident shall provide reasonable access to the utility for maintenance thereof. Any damage done to the property by the utility shall be corrected by the restoration of comparable grass, shrubbery, and trees from nursery stock to conform with the condition before the maintenance process began.

HISTORY: Amended by State Register Volume 31, Issue No. 5, eff May 25, 2007.