

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2014-69-S

IN RE: Application of Palmetto Wastewater)
 Reclamation, LLC d/b/a Alpine Utilities)
 and d/b/a Woodland 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 TODD CORLEY

1 **Q. Please state your name and the company you represent:**

2 A. I am Todd Corley. I am appearing on behalf of Corley Construction Company, LLC.

3 **Q. Where are you employed and in what capacity?**

4 A. I am employed by Corley Construction as a supervisor.

5 **Q. What is the business involved in this case?**

6 A. Corley Construction owns and operates Broad River Laundromat and Broad River
7 Car Wash located at 3509 and 3517 Broad River Road, Columbia, South Carolina.

8 **Q. What water and wastewater utilities serve these businesses?**

9 A. Water service is from the City of Columbia and wastewater service from Palmetto
10 Wastewater Reclamation, LLC, d/b/a Alpine Utilities (Alpine).

11 **Q. What is the purpose of your testimony?**

12 A. I am testifying on behalf of Corley Construction to respond to the proposed rate for
13 the laundromat and car wash requested by Alpine, specifically, the assumptions which form
14 the basis for the new rate and its history. I will show that the assumptions are incorrect and
15 that the new rate is unjust and unreasonable.

1 **Q. Please describe this proposed rate.**

2 A. Alpine proposes to charge us based upon DHEC Regulation 61-67. Using this
3 regulation allows Alpine to assume discharges from our two businesses which greatly exceed
4 our actual discharges. Our calculations show that the laundromat would be charged for about
5 2.6 times our actual usage and our car wash would be charged about 3.4 times actual usage.

6 **Q. Please explain why the proposed increase is unjust and unreasonable.**

7 A. We are asked to pay a much higher percentage increase than residential customers.
8 It is unjust and unreasonable to ask us to pay an exorbitant increase and to bear a
9 disproportionate share of the revenue requested. It is also unjust and unreasonable to charge
10 for the maximum possible daily use when that amount is more than the real usage.

11 In addition, the proposed rate increase will result in a significant economic impact
12 on Corley Construction. In January 2013, the PSC permitted Alpine to increase rates from
13 \$16.75 per SFE to \$29.00. (PSC Docket No. 2012-94-S.) Prior to that rate case, Corley was
14 paying a wastewater bill of approximately \$182 per month. I have attached Alpine's audit
15 of our billing history documenting that rate as **Exhibit 1**. In 2013, Alpine began billing
16 Corley Construction at a rate of \$1,812.50 per month. *See Exhibit 1*. This would indicate
17 that Alpine is attributing 62.5 SFEs to Corley Construction. In this rate case, filed
18 approximately one year after the first rate increase, Alpine now seeks to increase its rate to
19 \$35.50 per SFE. Assuming that 62.5 is the correct SFE number for Corley Construction,
20 then we would be facing a bill of \$2,218.75.

1 **Q. What is your response to the general increase requested by Alpine?**

2 A. We are in business too, and understand the need to earn a profit. While the overall
3 rate of return proposed by Alpine is for this Commission to decide, the amount Alpine
4 proposes to charge our businesses is significantly out of proportion to other customers.

5 **Q. Do you have a suggestion about how you might be charged?**

6 A. I suggest that the charge be based upon actual water usage. In its Application, Alpine
7 states that it is relying on the Single Family Equivalent in Regulation 61-67 as previously
8 noted. However, Alpine states that it, "...shall have the right to request and receive water
9 usage records from the provider of water..." Alpine states that, "If it is determined that actual
10 flows or loadings are greater than the design flows or loadings, then the utility shall
11 recalculate the customer's equivalency rating based on actual flows or loadings and thereafter
12 bill for its services in accordance with such recalculated loadings." I submit that this
13 approach should be used both to decrease the equivalency rating and to increase it. It is
14 unfair and unreasonable for the utility to be allowed to increase its charge based upon actual
15 water usage but not to allow the customer to decrease the charge on the same basis.

16 **Q. Does this conclude your testimony?**

17 A. Yes, it does.

18

EXHIBIT 1

Palmetto Wasterwater Reclamation LLC - Alpine

Service Address

Broad River Car Wash
 3517 Broad River Car Wash
 Columbia SC
 Account # 16000113.00 98

Billing Address

Broad River Car Wash - Attn: Markus Corley
 366 Firetower Rd.
 Irmo, SC 29063-9441

Type	Date	Code	Reading	Meter No	Description	Amount	Ref	Usage	Total
BEGIN BAL	9/14/2011					(\$1,074.02)			(\$1,074.02)
PAYMENT	9/14/2011					\$181.36	0		(\$1,255.38)
BILLING	9/30/2011					\$181.36			(\$1,074.02)
PAYMENT	10/19/2011					\$181.36	0		(\$1,255.38)
BILLING	11/1/2011					\$181.36			(\$1,074.02)
BILLING	12/1/2011					\$181.36			(\$892.66)
ADJUST	12/1/2011					\$2.72	0		(\$889.94)
PAYMENT	12/12/2011					\$365.44	0		(\$1,255.38)
BILLING	1/1/2012					\$181.36			(\$1,074.02)
PAYMENT	1/19/2012					\$181.36	0		(\$1,255.38)
BILLING	2/1/2012					\$181.36			(\$1,074.02)
BILLING	3/1/2012					\$181.36			(\$892.66)
ADJUST	3/1/2012					\$2.72	0		(\$889.94)
PAYMENT	3/6/2012					\$181.36	0		(\$1,071.30)
PAYMENT	3/15/2012					\$181.36	0		(\$1,252.66)
BILLING	4/1/2012					\$181.36			(\$1,071.30)
PAYMENT	4/19/2012					\$184.08	0		(\$1,255.38)
BILLING	5/2/2012					\$181.36			(\$1,074.02)
PAYMENT	5/24/2012					\$181.36	0		(\$1,255.38)
BILLING	6/4/2012					\$181.36			(\$1,074.02)
PAYMENT	6/15/2012					\$181.36	0		(\$1,255.38)
BILLING	7/2/2012					\$181.36			(\$1,074.02)
PAYMENT	7/17/2012					\$181.36	0		(\$1,255.38)
BILLING	8/1/2012					\$181.36			(\$1,074.02)
PAYMENT	8/17/2012					\$181.36	0		(\$1,255.38)

Type	Date	Code	Reading	Meter No	Description	Amount	Ref	Usage	Total
BILLING	9/5/2012					\$181.36			(\$1,074.02)
PAYMENT	9/21/2012					\$181.36	0		(\$1,255.38)
BILLING	10/1/2012					\$181.36			(\$1,074.02)
PAYMENT	10/10/2012					\$181.36	0		(\$1,255.38)
BILLING	11/2/2012					\$181.36			(\$1,074.02)
PAYMENT	11/14/2012					\$181.36	0		(\$1,255.38)
BILLING	12/4/2012					\$181.36			(\$1,074.02)
BILLING	1/4/2013					\$181.36			(\$892.66)
BILLING	1/4/2013					\$1,851.47			\$958.81
ADJUST	1/4/2013					\$2.72	0		\$961.53
PAYMENT	1/17/2013					\$181.36	0		\$780.17
BILLING	2/1/2013					\$2,247.50			\$3,027.67
BILLING	3/1/2013					\$2,247.50			\$5,275.17
ADJUST	3/1/2013					\$64.21	0		\$5,339.38
ADJUST	3/7/2013				Sewer Revenue A	(\$185.00)	0		\$5,154.38
ADJUST	3/7/2013				Sewer Revenue A		0		\$5,154.38
ADJUST	3/7/2013				Sewer Revenue A		0		\$5,154.38
ADJUST	3/7/2013				Sewer Revenue A	(\$185.00)	0		\$4,969.38
ADJUST	3/7/2013				Sewer Revenue A		0		\$4,969.38
ADJUST	3/7/2013				Sewer Revenue A	\$185.00	0		\$5,154.38
ADJUST	3/7/2013				Sewer Revenue A		0		\$5,154.38
ADJUST	3/7/2013				Sewer Revenue A	\$185.00	0		\$5,339.38
ADJUST	3/7/2013				Sewer Revenue A		0		\$5,339.38
ADJUST	3/7/2013				Sewer Revenue A	(\$435.00)	0		\$4,904.38
BILLING	4/2/2013					\$1,812.50			\$6,716.88
ADJUST	4/2/2013					\$72.57	0		\$6,789.45
PAYMENT	4/22/2013					\$181.36	0		\$6,608.09
BILLING	5/3/2013					\$1,812.50			\$8,420.59
ADJUST	5/3/2013					\$97.07	0		\$8,517.66
PAYMENT	5/23/2013					\$181.36	0		\$8,336.30
BILLING	6/3/2013					\$1,812.50			\$10,148.80
ADJUST	6/3/2013					\$121.59	0		\$10,270.39

Type	Date	Code	Reading	Meter No	Description	Amount	Ref	Usage	Total
PAYMENT	6/20/2013					\$181.36	0		\$10,089.03
BILLING	7/3/2013					\$1,812.50			\$11,901.53
ADJUST	7/3/2013					\$121.59	0		\$12,023.12
PAYMENT	7/11/2013					\$181.36	0		\$11,841.76
PAYMENT	7/24/2013					\$181.36	0		\$11,660.40
BILLING	8/2/2013					\$1,812.50			\$13,472.90
ADJUST	8/2/2013					\$168.07	0		\$13,640.97
PAYMENT	8/21/2013					\$181.36	0		\$13,459.61
BILLING	9/3/2013					\$1,812.50			\$15,272.11
ADJUST	9/3/2013					\$192.64	0		\$15,464.75
PAYMENT	9/12/2013					\$181.36	0		\$15,283.39
BILLING	10/2/2013					\$1,812.50			\$17,095.89
ADJUST	10/2/2013					\$217.23	0		\$17,313.12
PAYMENT	10/23/2013					\$181.36	0		\$17,131.76
BILLING	11/4/2013					\$1,812.50			\$18,944.26
ADJUST	11/4/2013					\$241.84	0		\$19,186.10
ADJUST	11/6/2013				Certified Lette	\$25.00	0		\$19,211.10
PAYMENT	11/18/2013					\$181.36	0		\$19,029.74
ADJUST	11/19/2013				Certified Lette	(\$25.00)	0		\$19,004.74
BILLING	12/5/2013					\$1,812.50			\$20,817.24
ADJUST	12/5/2013					\$266.47	0		\$21,083.71
PAYMENT	12/17/2013					\$181.36	0		\$20,902.35
ADJUST	1/2/2014				Late Penalty	\$291.12	6		\$21,193.47
BILLING	1/3/2014	AC			Rate Code: AC	\$1,812.50			\$23,005.97
PAYMENT	1/14/2014			908	CHECK IN MAIL	\$181.36	16		\$22,824.61
ADJUST	2/5/2014				Late Penalty	\$315.58	17		\$23,140.19
BILLING	2/5/2014	AC			Rate Code: AC	\$1,812.50			\$24,952.69
PAYMENT	2/27/2014			919	CHECK IN MAIL	\$181.36	111		\$24,771.33
BILLING	3/3/2014	AC			Rate Code: AC	\$1,812.50			\$26,583.83
ADJUST	3/3/2014				Late Penalty	\$340.05	33		\$26,923.88
PAYMENT	3/27/2014			929	CHECK IN MAIL	\$181.36	180		\$26,742.52
ADJUST	4/2/2014				Late Penalty	\$364.52	52		\$27,107.04

Type	Date	Code	Reading	Meter No	Description	Amount	Ref	Usage	Total
BILLING	4/2/2014	AC			Rate Code: AC	\$1,812.50			\$28,919.54
PAYMENT	4/22/2014			939	CHECK IN MAIL	\$181.36	233		\$28,738.18
ADJUST	5/2/2014				Late Penalty	\$388.98	65		\$29,127.16
BILLING	5/2/2014	AC			Rate Code: AC	\$1,812.50			\$30,939.66
PAYMENT	5/16/2014			943	CHECK IN MAIL	\$181.36	287		\$30,758.30
ADJUST	6/3/2014				Late Penalty	\$413.45	73		\$31,171.75
BILLING	6/3/2014	AC			Rate Code: AC	\$1,812.50			\$32,984.25
ADJUST	6/4/2014				First Certified	\$25.00	74		\$33,009.25
PAYMENT	6/20/2014			955	CHECK IN MAIL	\$181.36	367		\$32,827.89