

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of United)	
Services, Inc., for a Certificate of Convenience)	
and Necessity Authorizing it to Construct, Install,)	<u>File No. SA-2019-0161</u>
Own, Operate, Maintain, Control, and Manage)	
Sewer Systems in unincorporated areas in Andrew)	
And Nodaway Counties, Missouri)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and recommends that the Commission grant to United Services, Inc. (“United”) a Certificate of Convenience and Necessity (“CCN”) to provide regulated sewer services in unincorporated areas of Andrew and Nodaway Counties, Missouri. In support of this *Staff Recommendation*, Staff states as follows:

1. United filed its *Application and Request for Waiver* on November 29, 2018,¹ requesting a CCN authorizing it to construct, install, own, operate, control, manage, and maintain sewer systems in unincorporated areas in Andrew and Nodaway Counties, Missouri, and a waiver of the 60 day notice requirement of Commission Rule 4 CSR 240-4.017(1).
2. On December 26, 2018, the Commission ordered Staff to file a recommendation no later than January 26, 2019.
3. On January 25, 2019 Staff requested an extension until March 26, 2019, in order to process information. The Commission granted this request January 28, 2019.

¹ United Services filed an amended application on January 9, 2019, redacting customer information in response to the Commission’s *Order Directing Filing of Redacted Application and Request for Waiver*, dated January 8, 2019.

4. Pursuant to Section 393.170, RSMo, no sewer corporation shall provide service to consumers without first obtaining Commission approval. In determining whether to grant such approval, the Commission traditionally applies the five “Tartan Energy Criteria” established in *In the Matter of Tartan Energy Company, et al.*, 3 Mo. PSC 3d 173, 177 (1994): (1) there must be a need for the service; (2) the applicant must be qualified to provide the service; (3) the applicant must have the financial ability to provide service; (4) the applicant’s proposal must be economically feasible; and (5) the service must promote the public interest. In addition to the Tartan Criteria, when considering applications involving existing water and/or sewer systems, the Commission analyzes the Technical, Managerial, and Financial capabilities (“TMF”) of the applicant.

5. As explained in the Staff *Memorandum*, attached hereto as Appendix A, Staff conducted an investigation into United’s request. Based upon this review, Staff determined that United possesses the necessary TMF capabilities, and fulfills the requirements of the Tartan Energy Criteria. Accordingly, Staff asserts that granting the CCN is necessary and convenient for the public service and is not detrimental to the public interest, and recommends approval with conditions described in the Staff *Memorandum*.

6. Staff does not oppose United’s request for a waiver of the 60 day notice requirement of Commission Rule 4 CSR 240-4.017(1).

7. The Commission need not hold a hearing if, after proper notice and opportunity to intervene, no party requests such a hearing. *State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission*, 776 S.W.2d 494 (Mo. App. W.D. 1989).

Should no party or individual request a hearing in this matter, the Commission need not hold a hearing to grant a CCN to United.

WHEREFORE, Staff respectfully submits this Staff Recommendation for the Commission's information and consideration, and requests the Commission grant United a Certificate of Convenience and Necessity, with conditions, to provide sewer service to the requested service area.

Respectfully submitted,

/s/ Karen E. Bretz

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 26th day of March, 2019.

/s/ Karen E. Bretz

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, File No. SA-2019-0161

FROM: James A. Merciel, Jr – Water and Sewer Department
David A. Spratt – Water and Sewer Department
Jarrod J. Robertson – Water and Sewer Department
Matthew R. Young – Auditing Department
Karen Lyons – Auditing Department
Keith Majors – Auditing Department
Antonija Nieto – Auditing Department
Dana R. Parish – Customer Experience Department
Ben Rankin – Customer Experience Department
Amanda Coffey – Engineering Analysis Department

/s/ Curt B. Gateley / March 26, 2019
Case Manager / Date

/s/ Mark Johnson / March 26, 2019
Staff Counsel's Office / Date

SUBJECT: Recommendation of Approval on Application and Request for Waiver

DATE: March 26, 2019

CASE BACKGROUND

On November 29, 2018, United Services, Inc. (United) filed an *Application and Request for Waiver* (Application) in which it seeks a Certificate of Convenience and Necessity (CCN) to provide sewer service in several specified service areas in Andrew and Nodaway Counties. On November 30, 2018, the Commission issued its *Order Directing Notice and Setting Date for Intervention* in which it directed that notice be sent to the media serving in the areas, members of the General Assembly representing Andrew and Nodaway Counties, Missouri, and the county commissions of those counties. The Commission also set December 17, 2018, as the date by which any interested parties should file a request to intervene in this case. No parties sought intervention. On December 26, 2018, the Commission issued its *Order Directing Staff to File Recommendation* setting January 26, 2019, as the date by which Staff should file a recommendation in this case. Staff requested an extension of its filing date to March 26, 2019, which the Commission granted on January 28, 2019.

BACKGROUND OF UNITED AND THE SEWER SYSTEMS

United, originally named Nodaway Worth Services, Inc. according to posted documents on the Missouri Secretary of State website, is organized as a corporation owned by United Electric Cooperative, Inc. (the Co-op). The Co-op formed United originally for the purpose of providing

fiber optic based internet, television, and telephone services in locations within its electric cooperative service area.

United expanded to provide sewer service in approximately 2004. It presently operates ten (10) separate sewer systems, each serving subdivision-sized areas. United presently provides sewer service to approximately 290 customers; all except two are residential customers.

STAFF'S INVESTIGATION

The involved sewer systems already exist and are operated by United within the areas for which United is requesting a CCN. Since the electric cooperative operation is not subject to regulation by the Commission, the electric cooperative has been overseeing United's sewer operations with an assumption that there was also no regulatory oversight regarding sewer service to its customers. However, United is a "for-profit" corporation that is subject to the Commission's jurisdiction, and has filed this case to correct the situation.

Service Areas and Sewer Systems

United submitted information with its Application regarding locations of the requested service areas. However, to comply with 4 CSR 240-3.305(1)(A) 3. and 4., Staff and United worked together to create written metes and bounds descriptions and maps for the proposed service areas. This information will be suitable for United to include with a tariff document, if a CCN is approved. The metes and bounds descriptions of the proposed service areas are included with this Memorandum as Attachment A, and maps of all of the proposed service areas are shown on both United States Geological Survey maps and satellite photographs that are included with this Memorandum as Attachment B.

Five (5) of the sewer systems are located near the city of Maryville in Nodaway County. One (1) is near the city of Savannah and four (4) are near the city of St. Joseph in Andrew County. A list of the systems, including detail such as customer counts and plant hydraulic flow design capacity, is included herein as Attachment C.

All of the sewer systems treat wastewater using recirculating sand filter (RSF) treatment facilities. All utilize pressurized collecting sewers that require the use of septic tank effluent pump (STEP) units, sometimes generically called "pump units," for each of the customers' premises. When a new customer connects to the sewer system, the customer is required to pay for installation of the pump unit(s) and connection to United's collecting sewer, then United assumes ownership and maintenance responsibility of the pump units and the portion of the service sewer between the pump unit and the collecting sewer.

There are no significant non-compliance issues regarding treatment facility discharge regulations with the Missouri Department of Natural Resources (DNR), although the discharge permit for one of the facilities has expired. The expired permit required compliance with new ammonia limits

in 2016. United has submitted information to DNR for upgraded treatment and chlorine disinfection, which is presently in the approval review process. According to staff at DNR, two of the facilities have schedules of compliance with DNR regarding effluent disinfection for improved bacterial removal, and several have current discharge permits with future requirements for new ammonia limits. As is common with many sewage treatment facilities throughout Missouri and in other states, the resolution of most or all of these issues will require capital improvements to be undertaken within a few years. These improvements are necessary for compliance, but also would promote ongoing safe and adequate service. United indicates that it is in a position to be able to address these types of compliance issues, and is addressing all of these matters.

Plant-In-Service Balances

United's plant-in-service balances, as recorded on its books, consist of the collection sewers and treatment facilities that are located in each subdivision, and the STEP units that are located on each of the customers' lots. The feasibility study submitted by United describes the initial stages of the construction of the sewer systems as:

The developers of each subdivision were responsible for paying the cost of the original treatment plant and force main. Each lot owner is responsible to pay a connect fee and per foot rate when the STEP unit is installed. Upon completion and payment of the corresponding treatment plan or STEP unit, United Services assumes ownership of the asset and is responsible for the ongoing operation and maintenance of the wastewater treatment plant.¹

In Missouri's cost of service ratemaking, rate base generally represents the utility's unrecovered investment of the original cost of the utility infrastructure. The result of the developers' and lot owners' responsibilities to pay for the development costs (described above) is that United does not have substantial unrecovered investment in the original sewer systems. As such, the cost of the initial sewer systems is properly accounted for as Contributions in Aid of Construction (CIAC) plant which has no impact on rate base.

Since the construction of the first sewer system was placed into service in 2004, United has recorded a very small number of capital projects to add to the existing plant balances. Staff is hesitant to conclude that all historical capital costs have been identified and discussed in this CCN case. A portion of Staff's hesitance is related to United's capitalization policy which expenses costs below a certain threshold. Based on Staff's experience with other small sewer companies, there are certain items expensed by United that Staff would expect to be capitalized and Staff intends to explore this issue in United's next rate case.

¹ From Exhibit 4 of United Services' Application.

Although it appears United's rate base is negligible at this time, Staff is not making recommendations regarding rate base or prudence in the current case. In United's next rate case, Staff will submit additional discovery related to documentation for capital additions. Also, United's response to Staff Data Request (DR) No. 0020.2 indicates that United is planning or considering rate base investments during the next 24 months.

Other Accounting Issues

United's current accounting methodology does not distinguish sewer revenues and expenses from United's other business segments (e.g. high speed internet). Also, the current accounting methodology does not distinguish the types of sewer revenue and expenses (e.g. maintenance expense vs. payroll expense). Staff recommends that United implement the Uniform Systems of Accounts for Class C and D Sewer Utilities 1976 ("USOA") as prescribed by 4 CSR 240-61.020. United's implementation of the USOA should classify revenues and expenses, including the cost of the various services provided by White Cloud Engineering and Construction Company (White Cloud), its operations contractor and engineering consultant; and also assign capital costs to the appropriate USOA plant and reserve accounts. United should maintain documentation of the methodology used in its assignment of direct costs for review in a rate case.

Because United is 100% owned by the Co-op, it likely should allocate a portion of the parent company's costs to the sewer operations. Some of the Co-op's employees perform limited duties that can be directly assigned to United's sewer operations. Staff recommends that United immediately consider establishing an allocation methodology to assign overhead costs that benefit the sewer operations to sewer customers and a method of assigning the expenses of labor and benefits to the sewer operations, that can be reviewed in future rate cases. United should document any allocation methodology in such a way that ensures costs are not double recovered through sewer rates and the other business segments.

Based upon the data provided by United, and on some assumptions regarding the cost of service, the current rates² (and fees) charged to sewer customers are likely just and reasonable. However, Staff recommends that the Commission order United to commence a rate case within 24 months after the effective date of a Commission Order granting a CCN. Having 24 months of accounting for sewer revenues and costs under the USOA should provide the accuracy required for Staff to make a recommendation on United's cost of service.

Depreciation

For existing and future plant-in-service, United will need depreciation rates prescribed by the Commission for sewer utility plant accounts. Staff recommends the Commission approve sewer

² United Services currently charges customers \$35.44 or \$42.84 per month depending on the sewer system the customer is connected to and the customer type (residential or commercial).

depreciation rates similar to those prescribed for most small regulated sewer systems, as shown on Attachment D, included with this Memorandum.

Rate and Tariff Matters

United presently has two flat rates. A monthly rate of \$43.84 applies to commercial customers and to residential customers in Countryside subdivision.³ A monthly rate of \$35.44 applies to all other residential customers. Based on Staff's review, Staff does not recommend changing rates at this time.

If granted a CCN, United will need to file a tariff document, to be approved by the Commission, that includes rules for customers pertaining to sewer service, rate sheets and rate applicability, and with the service area descriptions and maps. Staff recommends such a tariff be filed no later than ten (10) days after the effective date of a Commission Order granting United a CCN. Staff has begun working with United to refine a draft tariff.

Technical, Managerial, and Financial Capacity, and Tartan Energy Criteria

Staff utilizes the concepts of technical, managerial, and financial capacities (TMF) in studying situations involving newly certificated water and/or sewer operations. United oversees or undertakes operations of the sewer system by utilizing a contract operator, and will rely on technical consultants for design, construction and major repairs. Financial resources for initial construction of sewer systems come largely from subdivision developers. United will utilize capital resources allocated from the Co-op's electric operation for major repairs and plant upgrades, as they become necessary.

When considering a request for a new CCN, the Commission applies criteria originally developed in Case No. GA-94-127, a CCN case filed by the Tartan Energy Company and referred to now as the "Tartan criteria." The Tartan criteria contemplate 1) need for service; 2) the utility's qualifications; 3) the utility's financial ability; 4) the feasibility of the proposal; and, 5) promotion of the public interest. For its reviews, in addition to these points, Staff also analyzes whether or not other utility entities are available to provide similar service. In this situation, no other utilities are readily available and willing to provide sewer services.

(1) Need for Service

There is a need for service. Existing customers have, and possible future customers will have, a desire and a need for sewer service. United presently operates existing sewer systems that are utilized to provide such service, and no other sewer systems are readily available.

³ United had made a decision to charge these residential customers the higher commercial rate, because it had incurred some additional cost commencing operation of this system beyond the normal costs associated with its other systems.

(2) Applicant's Qualifications

United has been providing safe and adequate sewer service for approximately fifteen (15) years. In Staff's opinion, United is sufficiently qualified, through its experience and that of its contract operator and engineering consultant, to provide the service.

(3) Applicant's Financial Ability

Based upon Staff's observation of current operations, United is capable of maintaining its facilities. United has adequate resources and planning to undertake future upgrades and repairs.

(4) Economic Feasibility of Proposal

United currently owns and operates the sewer systems. Based on a review of United's financial records, Staff concludes that current rates customers are paying both are reasonable and are producing adequate revenue. Future rate cases will address future capital expenditures.

(5) Promotion of the Public Interest

As the Commission determined in Case No. GA-94-127, positive findings with respect to the other four standards above will, in most instances, support a finding that an application for a certificate of convenience and necessity will promote the public interest. For the reasons outlined throughout this Memorandum, and considering this operation already exists with customers receiving sewer service at present, with no known service issues, Staff asserts that United's request for a CCN serves the public interest. In Staff's opinion the points regarding TMF capacities and the Tartan Energy criteria are all met for this case.

Publicity and Customer Notice

United proposes to retain existing rates at this time. As detailed herein, Staff recommends minor changes to the handling of customer accounts based on requirements as per the Commission's customer billing regulations, 4 CSR 240-13, but these are not substantial changes that would significantly impact existing customers. Therefore, Staff asserts that there is no need for any special customer notice or a local public hearing regarding this proposal. United will need to communicate with customers after the granting of a CCN, as is normal procedure for all regulated sewer utilities.

Customer Experience Department

Staff's Customer Experience Department (CXD) submitted data requests to United on December 17, 2018, and January 9, 2019, in order to evaluate United's present customer service operating practices. In addition, Staff interviewed United's personnel at its Savannah, Missouri, office location on January 15, 2019. All customer service functions, including billing for sewer service, are performed out of the Savannah office.

If issued a CCN, United will be required to comply with the provisions of 4 CSR 240-13 (“Service and Billing Practices for Residential Customers of Electric, Gas, Sewer, and Water Utilities”), referred to as Chapter 13, which govern billing and payment standards, discontinuance of service, and other customer service processes. To assist United with these requirements, CXD Staff sent a letter to United dated December 18, 2018, which included a copy of Chapter 13, along with model documents for operations recordkeeping, such as vehicle logs and customer complaint logs, which could assist with rule compliance.

United requires prospective customers requesting new sewer service to complete a user agreement. This agreement summarizes United’s billing processes as well as customers’ rights and responsibilities. United contracts with White Cloud for construction and maintenance of United-owned service sewers and STEP units that are in place for each customer. Customers are instructed to contact White Cloud directly for initial installation of components and connection to the sewer system. United stated, in response to DR No. 0005, that it does not collect deposits from customers.

United’s billing for sewer and fiber optic services is included on the Co-op’s electric service billing. The Co-op utilizes billing software provided by National Information Systems Cooperative. Staff recommends that billing statements include the sewer customer’s physical service address, if different from the billing address, as well as ensuring all fields on the billing statement are filled out consistently. For example, page 6 of the billing samples submitted in response to DR No. 0006 states that it is a new account, but does not include a date in the “Past Due After” field on the bill. Staff also recommends that United add appropriate terminology to the bill, instructing customers on how to initiate an inquiry or complaint regarding utility service and utility charges.

All verbiage on the customer bill should be easily identifiable and readable. Customer billing statements include a field for the billing date with a net due amount listed, as well as a field for the past due date with a gross due amount listed. The gross due amount includes the amount due, plus any past due penalties. Staff notes the use of terminology “net due” and “gross due” could confuse customers. Staff recommends clearly marking the billing date, due date, and the past due date on the customer bill, as well as the late fee charge if payment is made after due date. Additionally, page one of the billing sample provided in United’s response to DR No. 0006 contains a customer message in the top right-hand corner that reads: “Just a friendly reminder that one or more of your services is past due. Past due services are subject to disconnection if not paid by 12/13/2018. This is the only notice you will receive.” This notification is crowded on the invoice and difficult to read. Staff recommends United ensure formatting on the customer bill is easy to read and understand.

Customer payment options include check, credit card, debit card, and bank draft, with options to pay in person, by phone, or online. SmartHub is an available application which allows customers

to manage all aspects of their account, from viewing real-time outage management, updating account information, to making a payment. This service is available online or by app on mobile devices, allowing customers to make payments from their checking account, credit card, or debit card. A Savannah, Missouri, office mailing address included on the billing statements is used for payment remittance, with customers advised to allow 3-5 days if paying by mail. Cash payments are accepted in the business office locations, with night and weekend payment depositories also available at each United location. A fee of \$30 is applied for all returned check payments.

United's current billing process does not comply with the provisions of 4 CSR 240-13.020(7), which states that "a monthly-billed customer shall have at least twenty-one (21) days ... from the rendition of the bill to pay the utility charges." United's current billing process only provides customers twenty (20) days before their unpaid balance is classified as 'delinquent.' United detailed its delinquent account actions in its response to DR No. 0009.1. As an example, based on United's practices, bills mailed March 4 would be due on March 24. Bills that remain unpaid would be deemed delinquent on March 25 and a \$5 late fee would be applied. A "Friendly Reminder" bill would be sent by April 4th advising of the delinquent balance, with the past due amount due in 10 days (April 13). Delinquent customer calls are placed April 14 and United continues to attempt to contact the customer, or reach out to the landlord if it is a rental unit, thereafter. Accounts are subject to discontinuance of service any time after the 13th of the month following the billing date if the account remains unpaid, in this example May. United indicated that it rarely has to discontinue service to any customers for nonpayment. To ensure compliance with the rules set forth in Chapter 13, United needs to modify its billing practices to provide monthly-billed customers at least twenty-one (21) days from the rendition of bills to pay charges for sewer service.

United's emergency contact numbers are listed on both the customer's bill and the sewer user agreement, but they are not the same number. According to United's billing statements, customers may call 1-800-748-1488 to reach United for assistance 24-hours a day. Calls received after hours, on weekends, or holidays are routed to Midwest Mobile, a third-party answering service located in St. Joseph, Missouri. Technical calls are then routed to White Cloud technicians. However, the sewer user agreement lists White Cloud contacts, Kyle Wailings (660-254-0011) and Chad Fulton (816-387-7198), as well as White Cloud's St. Joseph office phone (660-582-4111). The user agreement directs customers to only contact United if a representative from White Cloud has not responded within 24 hours. To ensure consistent messaging to customers, Staff recommends that the emergency contact number listed on the billing statement match the emergency contact number listed on the sewer user agreement. Additionally, the emergency contact number on the billing statement is located near the middle of the billing statement. The Company should consider moving the emergency number to the top of the statement or to a more visible location.

United's customer service department consists of designated customer service representatives that handle only electric calls, while the rest take both sewer and telecom calls. Because of this, it is crucial to track customer service hours for sewer related calls. United asserts technician hours will be tracked electronically by White Cloud and United can focus on allocating customer service hours going forward. Both entities seemed willing to comply with Staff's suggested changes as noted in response to DR No. 0045. Staff recommends that United Services or its contractor, White Cloud, track sewer customer service hours more closely.

United's response to DR No. 0045 indicates that White Cloud is responsible for tracking complaint and service issues by service location. This was also discussed with United and White Cloud during the January 15th meeting. White Cloud shared the complaint log it currently uses and informed Staff it periodically updates United regarding work it has completed. Staff recommends that White Cloud use a detailed customer complaint log, similar to the sample log shared with United included with the December 18, 2018 letter. Additionally, Staff recommends that White Cloud report complaints and service issues to United in a timely manner. Staff stresses that procedures must be in place for customer inquiries and complaint tracking per 4 CSR 240-13.040.

Customer communication was assessed through data requests to United. United asserts in DR No. 0008 that no notice was sent to United customers as a result of this current case before the Commission. Staff spoke with United officials at the onset of this case, in which United indicated it would comply with whatever Staff recommends. Staff recommends that United communicate with customers, as soon as possible, but no later than thirty (30) days after the effective date of approval of this case. Communication should also include an informational brochure detailing the rights and responsibilities of United and its customers that is required by Commission Rule 4 CSR 240-13.040(3). This was discussed by Staff with United during the site visit, and United asserted it would comply. Staff recommends that United be required to send copies of communications and the brochure to Staff, along with a statement detailing when the information was sent to customers.

REGULATORY COMPLIANCE ISSUES

Should the Commission grant United a CCN to operate as a regulated sewer utility, then United must comply with various regulations, including but not limited to 4 CSR 240 Chapters 3, 10, 13 and 50. Specific requirements include filing and keeping the aforementioned tariff current with any changes to requirements of customers, maintaining and upgrading sewer plant assets such that they meet state and federal waste water discharge standards, complying with requirements for regularly occurring filings such as annual reports, developing customer billing procedures, recording expenses in accordance with the Uniform System of Accounts, and the payment of annual assessments as imposed by the Commission.

STAFF'S RECOMMENDATIONS AND CONCLUSIONS

Staff's position, based on its review as described herein, is that the proposal for a new CCN issued to United authorizing the provision of sewer service, along with approval of service area, rates, and depreciation rates as described in this Memorandum, serves the public interest as the operations providing service, and the customers receiving the same, will receive the attendant benefits of rate regulation and oversight. Staff recommends approval, with the conditions as outlined below.

STAFF'S RECOMMENDATIONS

Staff recommends that the Commission:

1. Grant United a CCN to provide sewer service in the service areas requested and as shown by the maps and metes and bounds descriptions included with this Memorandum;
2. Approve a monthly flat rate for sewer service of \$43.84 applicable to commercial customers and to residential customers in Countryside subdivision, and \$35.44 applicable to all other residential customers;
3. Approve depreciation rates for sewer utility plant accounts as described and shown herein;
4. Require United to submit a complete tariff for sewer service, as a thirty (30) day filing, within ten (10) days after the effective date of approval of a CCN by the Commission;
5. Require United to implement the Uniform Systems of Accounts for Class C and D Sewer Utilities 1976 ("USOA") as prescribed by 4 CSR 240-61.020;
6. Require United to initiate a rate case within 24 months after the effective date of an order granting a CCN;
7. Require United to establish an allocation methodology to assign parent company costs that benefit the sewer company to sewer customers;
8. Require United to maintain documentation of sewer related revenues and costs;
9. Require United to keep records identifiable for each of its systems, including those for customer account records and capital costs;
10. Require employees of United or an affiliate to maintain timesheets in sufficient detail to allocate time spent on regulated and non-regulated activities as well as capital or non-capital projects;
11. Require United to comply with all Commission Rules including the filing of annual reports and payments of the Commission's annual assessments;
12. Make no finding that would preclude the Commission from considering any ratemaking treatment in any later proceeding;

13. To improve bill clarity, direct United to consider implementing the following bill design changes:
 - a. Billing statements should include the sewer customer's physical (service) address;
 - b. All fields on the billing statement should be filled out consistently;
 - c. Add appropriate terminology to the bill instructing customer how to initiate an inquiry or complaint regarding utility service and utility charges;
 - d. Clearly mark the billing date, due date, and past due date on the billing statement and the formatting on the customer bill should be easy to read and understand; and;
 - e. Ensure the emergency contact numbers on the billing statement and user agreement are the same and up-to-date, as well as move the number to the top of the billing statement;
14. Require United to provide the CXD Staff a sample of three (3) bills from the first billing cycle after the effective date of approval of a CCN by the Commission;
15. Require United to comply with 4 CSR 240-13.020(7), allowing monthly-billed customers at least twenty one (21) days from the rendition of bills to pay charges for sewer service;
16. Require United, including its contractor White Cloud, to consistently track customer service hours related to sewer service;
17. Require United to distribute to all customers an informational brochure detailing the rights and responsibilities of the utility and its customers regarding the provisions of sewer service, including customers' ability to contact the Public Service Commission regarding billing or service issues;
18. Create and maintain a customer complaint log consistent with the requirements of Commission Rule 4 CSR 240-13, within thirty (30) days after the effective date of a Commission Order granting a CCN; and,
19. Require United to file notice in this case once the actions in Staff recommendations regarding customer communication and information to be sent to Staff, above, have been completed.

Staff will submit a further recommendation regarding a sewer tariff to be filed by United in this matter.

Attachments:

- A: Metes and Bounds Descriptions of the Proposed Sewer Service Areas
- B: Topographic and Satellite Photo Maps of the Proposed Sewer Service Areas
- C: List of the Sewer Systems with Location and Overview Information
- D: Schedule of Depreciation Rates for Sewer Plant

United Services, Inc. -- Metes and Bounds Descriptions

Country Side View (Maryville)

Beginning at the NW corner of Section 24 Township 64 North Range 35 West;

Thence easterly along the north line of said Section 24 a distance of 1,412 feet m/l to the SE corner of the SW quarter of Section 13 Township 64 North Range 35 W:

Thence northerly along the west line of the SW quarter of the SE quarter of the SW quarter of Section 13 a distance of 787 feet m/l to the northwest corner of the said SW quarter of the SE quarter of the SW quarter of Section 13;

Thence easterly along the north line of the said SW quarter of the SE quarter of the SW quarter of Section 13, and along the north line of the SE quarter of the SE quarter of the SW quarter of said section 13 a distance of 1,412 feet m/l to the NE corner of the SE quarter of the SE quarter of the SW quarter of Section 13;

Thence southerly along the east line of the said SE quarter of the SW quarter of Section 13 a distance of 787 feet m/l to the SE corner of the SW quarter of Section 13, also the NE corner of the NW quarter of said Section 24;

Thence; continuing southerly along the east line of the NW quarter of Section 24 a distance of 1,375 feet m/l to the SE corner of the NE quarter of the NW quarter of Section 24;

Thence westerly along the south line of the said NE quarter of the NW quarter of Section 24, and continuing westerly along the south line of the NW quarter of the NW quarter of Section 24 a distance of 2,812 feet m/l to the SW corner of the NW quarter of the NW quarter of Section 24;

Thence northerly along the west line of the said NW quarter of the NW quarter of Section 24 a distance of 1,363 feet m/l to the NW corner of Section 24 and the Point of Beginning.

Containing 202.64 acres more or less.

Pleasant View Addition (Maryville)

Beginning at the NW corner of the SW quarter of the SE quarter of Section 14 Township 64 North Range 35 West;

Thence southerly along the west line of said SW quarter of the SE quarter of Section 14 a distance of 1,425 feet m/l to the south line of said Section 14;

Thence westerly along the south line of Section 14 a distance of 1,625.0 feet to a point;

Thence southerly along a line that is parallel to the west line of Section 23 Township 64 North Range 35 West a distance of 687 feet m/l to the south line of the NE quarter of the NW quarter of the NW quarter of Section 23;

Thence easterly along the south quarter-quarter-quarter section line of the NE quarter of the NW quarter of the NW quarter of Section 23, along the south line of the North one-half of the NE quarter of the NW quarter, and along the south line of the North one-half of the NW quarter of the NE quarter of Section 23 a distance of 3,000 feet m/l to the SE corner of the NE quarter of the NW quarter of the NE quarter of Section 23;

Thence northerly along the east line of the said NE quarter of the NW quarter of the NE quarter of Section 23 a distance of 687 feet m/l to the north line of Section 23 and also the SE corner of the SW quarter of the SE quarter of said Section 14;

Thence northerly along the east line of said SW quarter of the SE quarter of said Section 14 a distance of 1,425 feet m/l to the NE corner of the SW quarter of the SE quarter of said Section 14;

Thence westerly along the north line of the NE corner of the SW quarter of the SE quarter of said Section 14 a distance of 1,375 feet to the NW corner of the SW quarter of the SE quarter of Section 14 and the Point of Beginning.

Containing 92.3 acres more or less.

Stoll Addition (Maryville)

Beginning at the NE corner of the SW quarter of Section 21 Township 64 North Range 35 West;

Thence easterly along the quarter section line a distance of 864.0 feet to a point;

Thence southerly along a line that is parallel to the east line of Section 21 a distance of 1,317 feet m/l to a point that is on the south line of Section 21;

Thence westerly along the said south line of Section 21 a distance of 3,366 feet m/l to a point that is on the east r/w of US Highway 71;

Thence northerly along said east r/w of US Highway 71 a distance of 805.0 feet;

Thence North 74° 13' 41" East 1,660 feet m/l to a point that is on the north line of the SW quarter of Section 21;

Thence easterly along the north line of said SW quarter of Section 21 a distance of 793 feet m/l to the NE corner of the SW quarter of Section 21 and the Point of Beginning.

Containing 99.77 acres, more or less.

Scout Ridge Estates (Maryville)

Beginning at the SW corner of the East half of the SW quarter of the SE quarter of Section 8 Township 64 North Range 35 West;

Thence northerly along the west line of said East half of the SW quarter of the SE quarter of Section 8 a distance of 950.0 feet to a point;

Thence easterly along a line that is parallel to the south line of Section 8 a distance of 343 feet m/l to the west line of the East half of the NE quarter of the SW quarter of the SE quarter of Section 8;

Thence northerly along the said west line of the said East half of the NE quarter of the SW quarter of the NE quarter of the SE quarter of Section 8 a distance of 260 feet to a point;

Thence easterly along a line that is parallel to the south line of Section 8 a distance of 1751 feet m/l to a point that is on the east line of Section 8;

Thence southerly a distance of 1,210.0 feet to the SE corner of Section 8;

Thence westerly a distance of 2,094 feet m/l to the SW corner of the East half of the SW quarter of the SE quarter of Section 8 and the Point of Beginning. Containing 56.09 acres, more or less.

Highland Estates (Maryville)

Beginning at the NW corner of Section 25 Township 65 North Range 36 West;

Thence easterly along the north line of said Section 25 a distance of 5,415 feet m/l to the NE corner of Section 25;

Thence southerly along the east line of Section 25 a distance of 2,366 feet m/l to a point on the north r/w of State Route V;

Thence westerly along the north r/w of State Route V a distance of 5,050 feet m/l, thence continuing along a westerly extension of the north r/w line, parallel to the east-west quarter section line, a distance of 440 feet m/l to the west line of said Section 25;

Thence northerly along the west section line of Section 25 a distance of 2,683 feet m/l to the NW corner of Section 25 and the Point of Beginning.

Containing 311.3 acres more or less.

Spring Meadow/Meadowview (Savannah)

Beginning at the NW corner of the NE quarter of Section 10 Township 59 North Range 35 West;

Thence southerly along the west line of the said NE quarter of Section 10 a distance of 2,300.0 feet to a point;

Thence easterly along a line that is parallel to the north line of Section 10 a distance of 1,373 feet m/l to the east line of the SW quarter of the NE quarter of Section 10;

Thence North 60° East a distance of 793 feet m/l to a point that is on the east line of the West half of the SE quarter of the NE quarter of Section 10;

Thence easterly along a line that is parallel to the north line of Section 10 a distance of 687 feet m/l to a point on the east line of Section 10;

Thence northerly along the east line of Section 10 a distance of 1,900 feet m/l to the NE corner of Section 10;

Thence westerly along the north line of Section 10 a distance of 2,747 m/l to the NW corner of Section 10 and the Point of Beginning.

Containing 135.59 acres, more or less.

Millstone – Indian Ridge (St. Joseph)

Beginning at the SW corner of Section 12 Township 35 North Range 58 West;

Thence north along the west line of said Section 12 a distance of 988 feet m/l to the east r/w of US Highway 169;

Thence northeasterly along the said Highway 169 r/w a distance of 445 feet m/l to the north line of the south half of the SW quarter of Section 12;

Thence, easterly along the said north line of the south half of the SW quarter a distance of 1,802 feet m/l to the NE corner of the west half of the SE quarter of the SW quarter of Section 12;

Thence southerly along the east line of the said west half of the SE quarter of the SW quarter of Section 12 a distance of 518.0 feet;

Thence easterly along a line parallel to the south line of Section 12 a distance of 124.0 feet to a point;

Thence southerly along a line that is parallel to the east line of Section 12 a distance of 222.0 feet to a point;

Thence westerly along a line parallel to the south line of Section 12 a distance of 124.0 feet to a point that is on the east line of the said West half of the SE quarter of the SW quarter of Section 12;

Thence southerly along the east line of the west half of the SE quarter of the SW quarter of Section 12 a distance of 618 feet m/l to the south line of Section 12;

Thence westerly along the south line of Section 12 a distance of 1,333 feet m/l to the NE corner of the west half of the NW quarter of the NW quarter of Section 13 Township 35 North Range 58 West;

Thence southerly along the east line of said west half of the NW quarter of the NW quarter of Section 13, and continuing southerly along the east line of the NW quarter of the SW quarter of the NW quarter of Section 13 a distance of 2,074 feet m/l to the SE corner of said NW quarter of the SW quarter of the NW quarter of Section 13;

Thence easterly along a line parallel to the south line of the NW quarter of Section 13 a distance of 225.0 feet to a point;

Thence southerly along a line parallel to the west line of Section 13 a distance of 679 feet m/l to the south line of the NW quarter of Section 13;

Thence westerly along the said south line of the NW quarter of Section 13 a distance of 1,062 feet m/l to the SW corner of Section 13; and continuing westerly along the south line of Section 14 Township 35 North Range 58 West a distance of 1,062.0 feet to a point;

Thence North 16° 00' 00" West a distance of 719 feet m/l to the east r/w of US Highway 169;

Thence northeasterly along the said Hwy 169 r/w to the north line of Section 14;

Thence easterly along the north line of Section 14 a distance of 543 feet m/l to the NE corner of Section 14, also being the SW corner of Section 12, and the Point of Beginning.

Containing 183.07 acres, more or less.

Tuscany Lake/Vista Ridge/West Ridge/Bristol (St. Joseph)

Beginning at the NW corner of the South half of the SE quarter of Section 34 Township 59 North Range 35 West;

Thence northerly along the west line of the SE quarter of Section 34 a distance of 300.0 feet to a point;

Thence easterly along a line that is parallel to the north line of the South half of the SE quarter of Section 34 a distance of 760.0 feet to a point;

Thence South 38° 18' 31" East a distance of 1274 feet m/l to a point that is on the west r/w of US Highways 71 and 59;

Thence southerly along the said west r/w of US Highways 71 and 59 a distance of 2,370 feet m/l to a point that is 395.0 feet south of the north line of the South half of the NE quarter of Section 3 Township 58 North Range 35 West;

Thence westerly along a line that is parallel to the said north line of the South half of the NE quarter of Section 3 a distance of 2,296 feet m/l to a point that is on the west line of the East half of the East half of the NW quarter of Section 3;

Thence northerly along the said East half of the East half of the NW quarter of Section 3 a distance of 840.0 feet to a point;

Thence easterly along a line that is parallel to the north line of the South half of the NE quarter of Section 3 a distance of 670 feet m/l to a point that is on the west line of the NE quarter of Section 3;

Thence northerly along the west line of the NE quarter of Section 3 a distance of 914 feet m/l to the NW corner of the NE quarter of Section 3

Thence easterly along the north line of Section 3 also the south line of said Section 34 a distance of 247 feet m/l to the SW corner of the SE quarter of Section 34;

Thence northerly along the west line of the SE quarter of Section 34 a distance of 1,358 feet m/l to the NW corner of the South half of the SE quarter of Section 34 and the Point of Beginning.

Containing 129.72 acres, more or less.

Dawn Valley (St. Joseph)

Beginning at the NW corner of the SW quarter of Section 2 Township 58 North Range 35 West; thence southerly along the west line of Section 2 a distance of 247.0 feet to the True Point of Beginning;

Thence easterly along a line that is parallel to the north line of the SW quarter of Section 2 a distance of 716 feet m/l to a point that is on the east line of the West half of the West half of the SW quarter of Section 2;

Thence southerly along the said east line of the West half of the West half of the SW quarter of Section 2 a distance of 740.0 feet to a point;

Thence westerly along a line that is parallel to the north line of the SW quarter of Section 2 a distance of 716 feet m/l that is on the west line of Section 2, and continuing westerly along an extension of that line into Section 3 Township 58 North Range 35 West a distance of 100.0 feet to a point;

Thence North 61° 11' 9" West a distance of 718 feet m/l to a point that is on the east r/w of US Highways 71 and 59;

Thence northerly along the said east r/w of US Highways 71 and 59 a distance of 518 feet m/l to a point that is 247.0 feet south of the westerly extension of the north line of the SW quarter of Section 2;

Thence easterly along a line that is parallel to the north line of the SW quarter of Section 2 a distance of 790 feet m/l to the west line of Section 2 and the True Point of Beginning.

Containing 24.57 acres, more or less.

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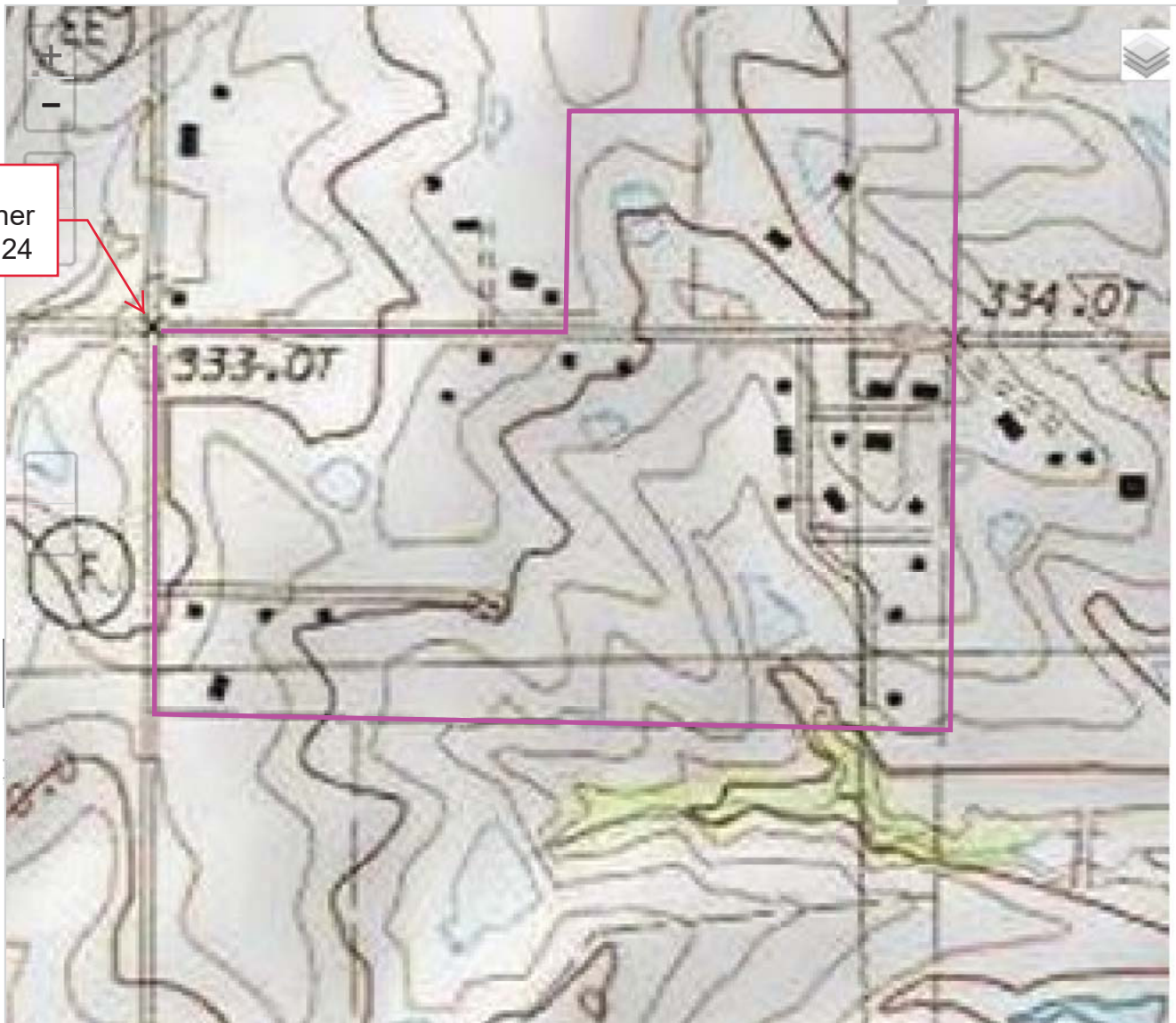
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Country Side View

100 m
500 ft

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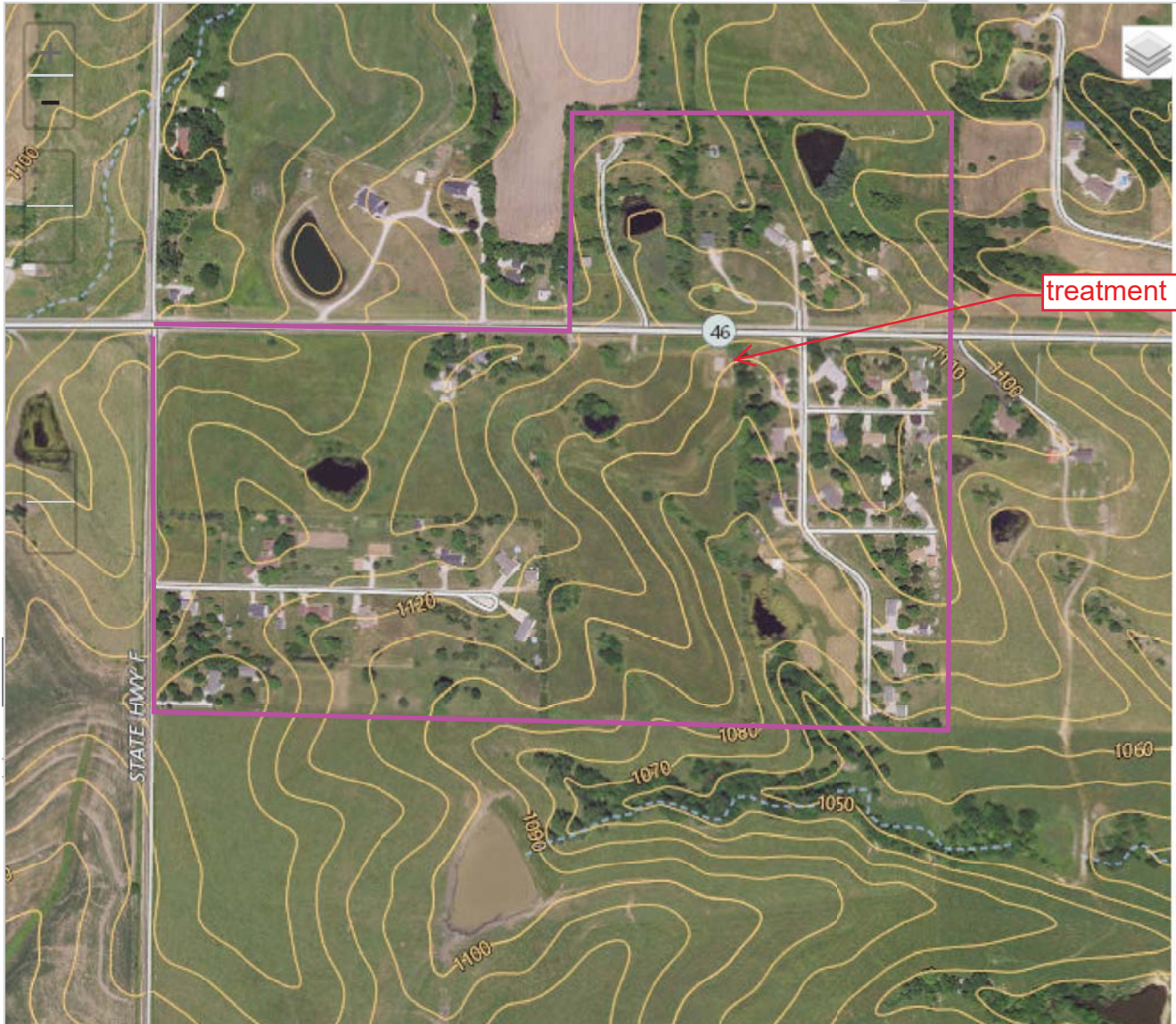
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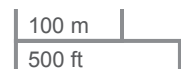
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Country Side View



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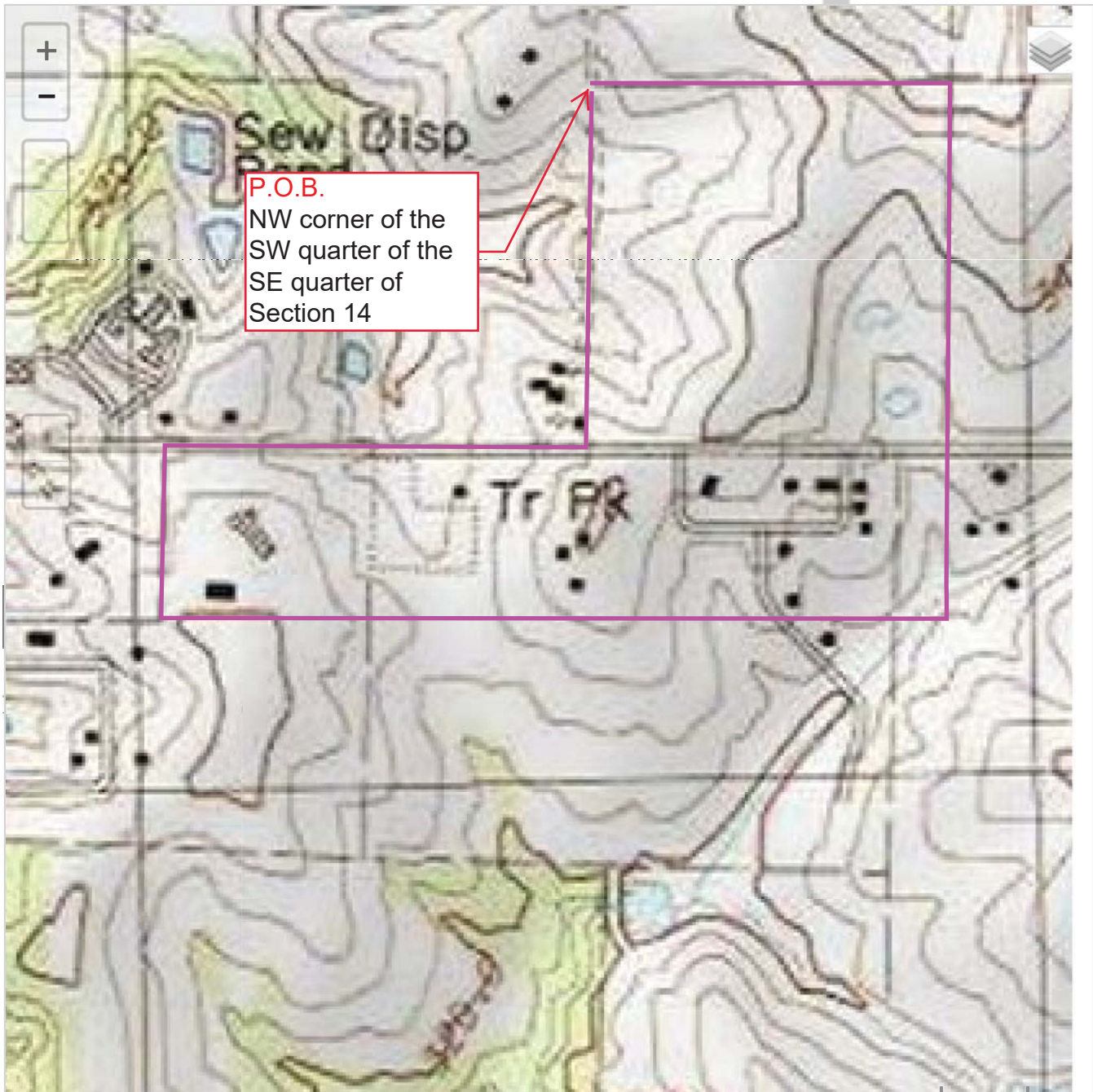
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Pleasant View Addition

100 m
500 ft

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Pleasant View Addition

100 m
500 ft

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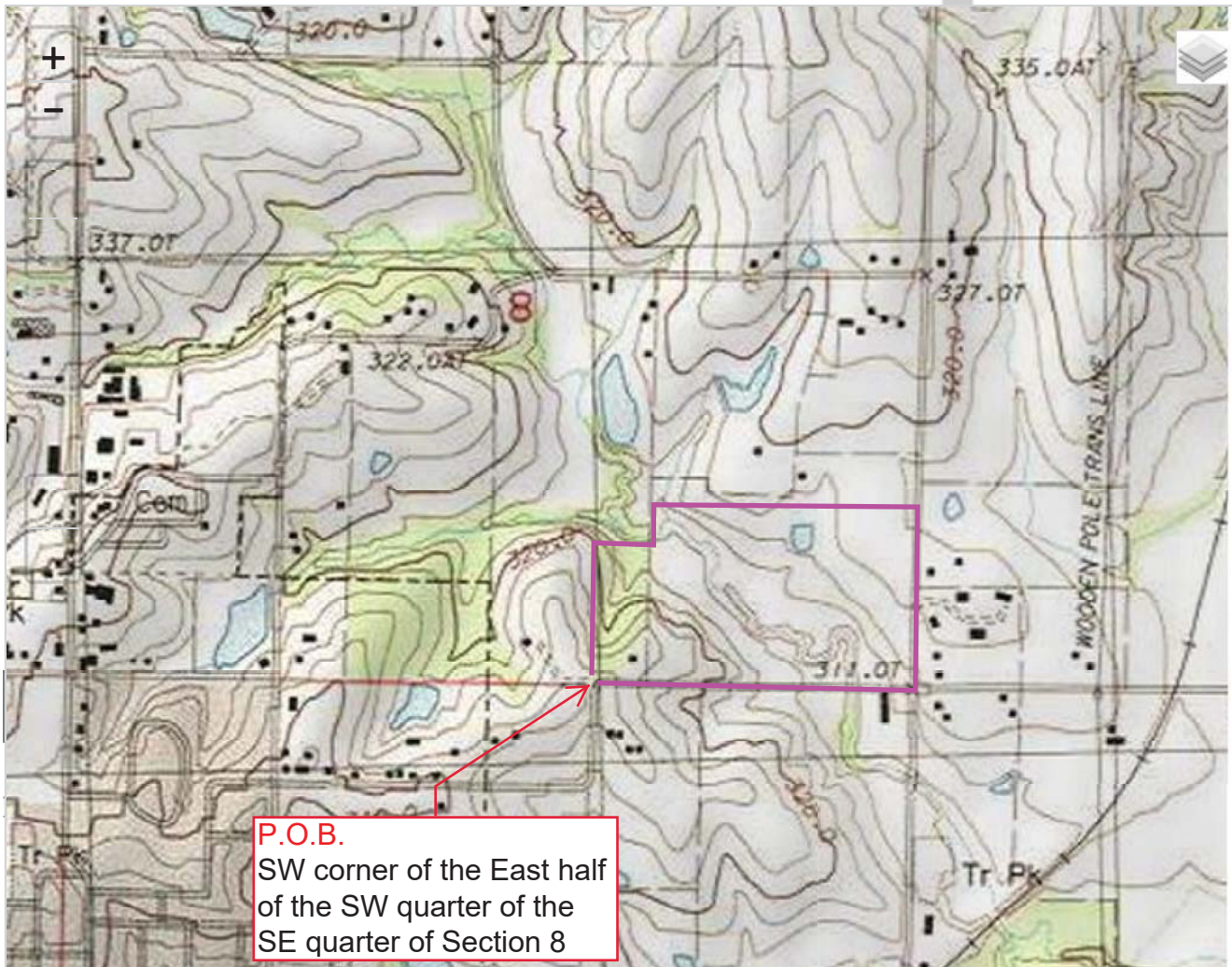
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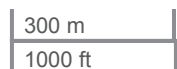
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Scout Ridge Estates



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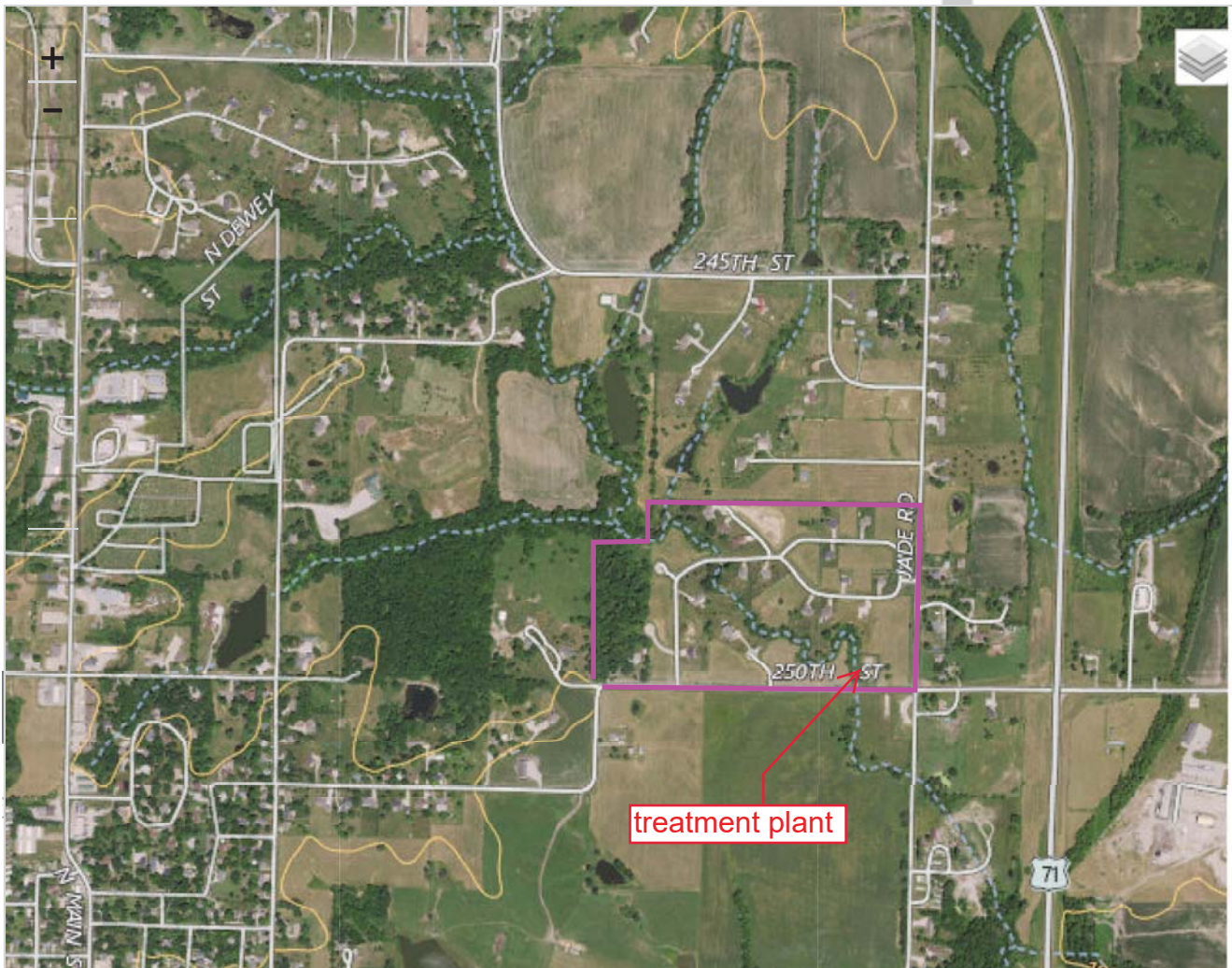
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Scout Ridge Estates

300 m
1000 ft

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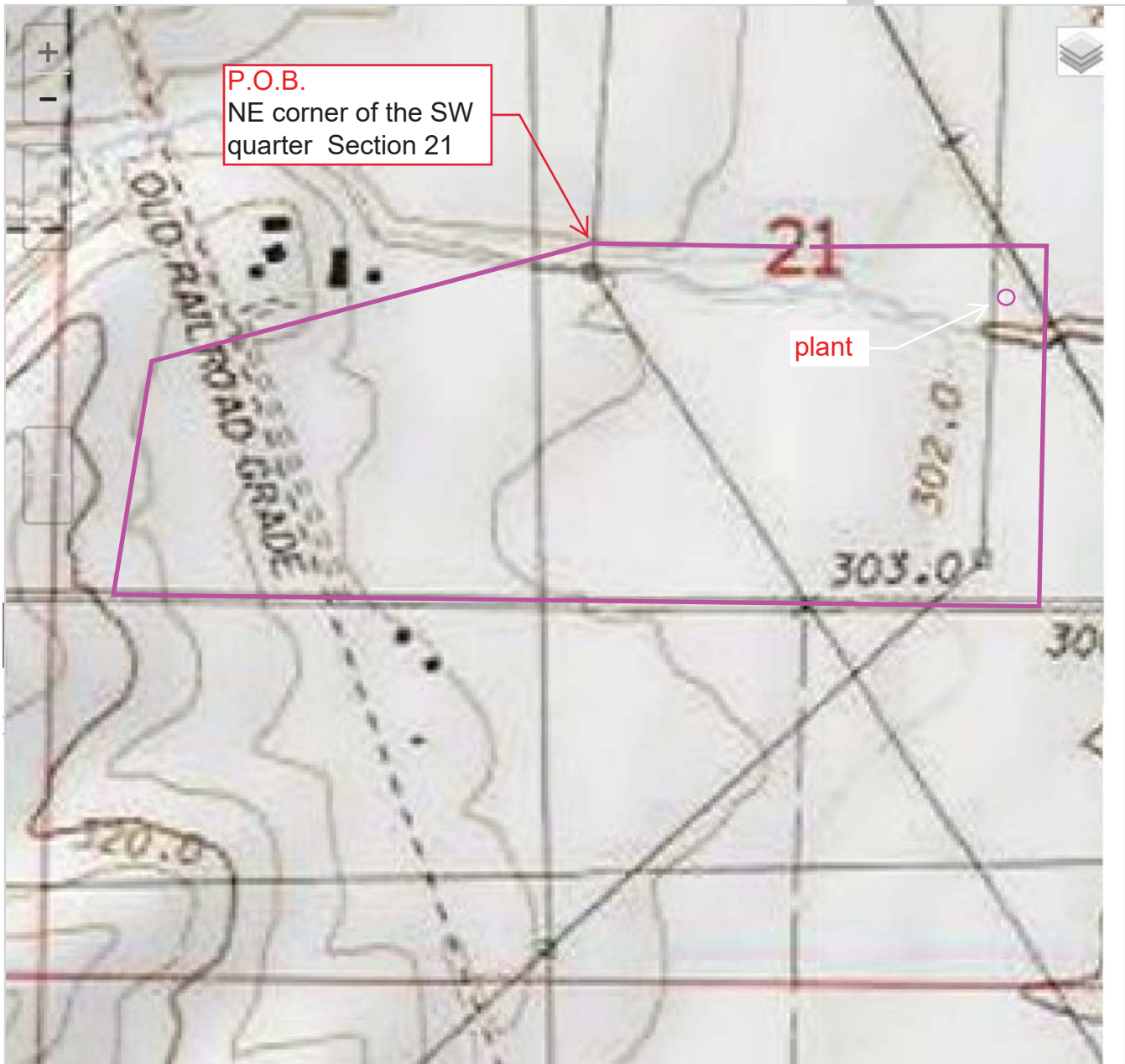
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Stoll Addition



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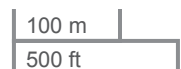
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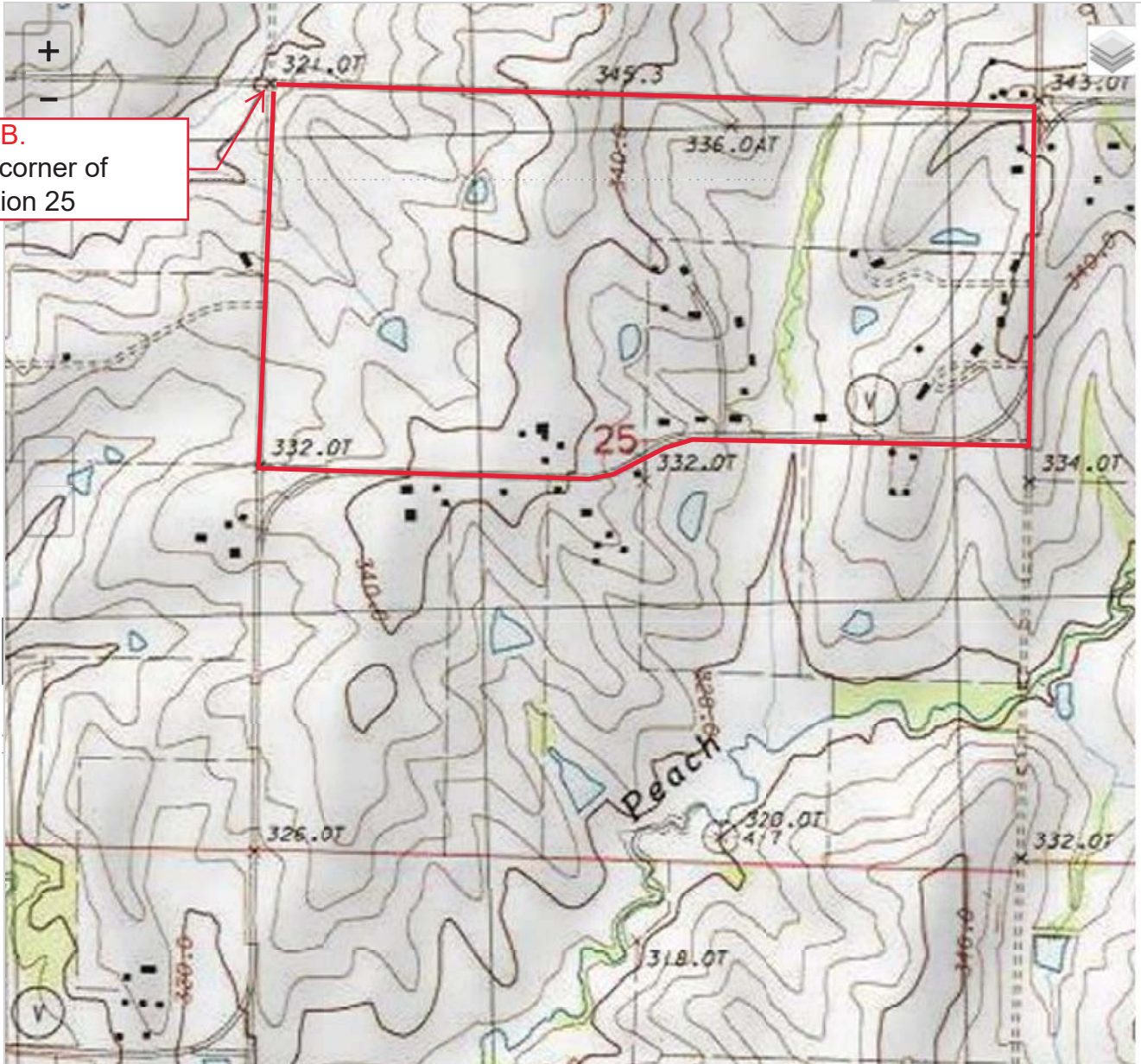
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Clear

P.O.B.
NW corner of
Section 25



Highland Estates

300 m
1000 ft

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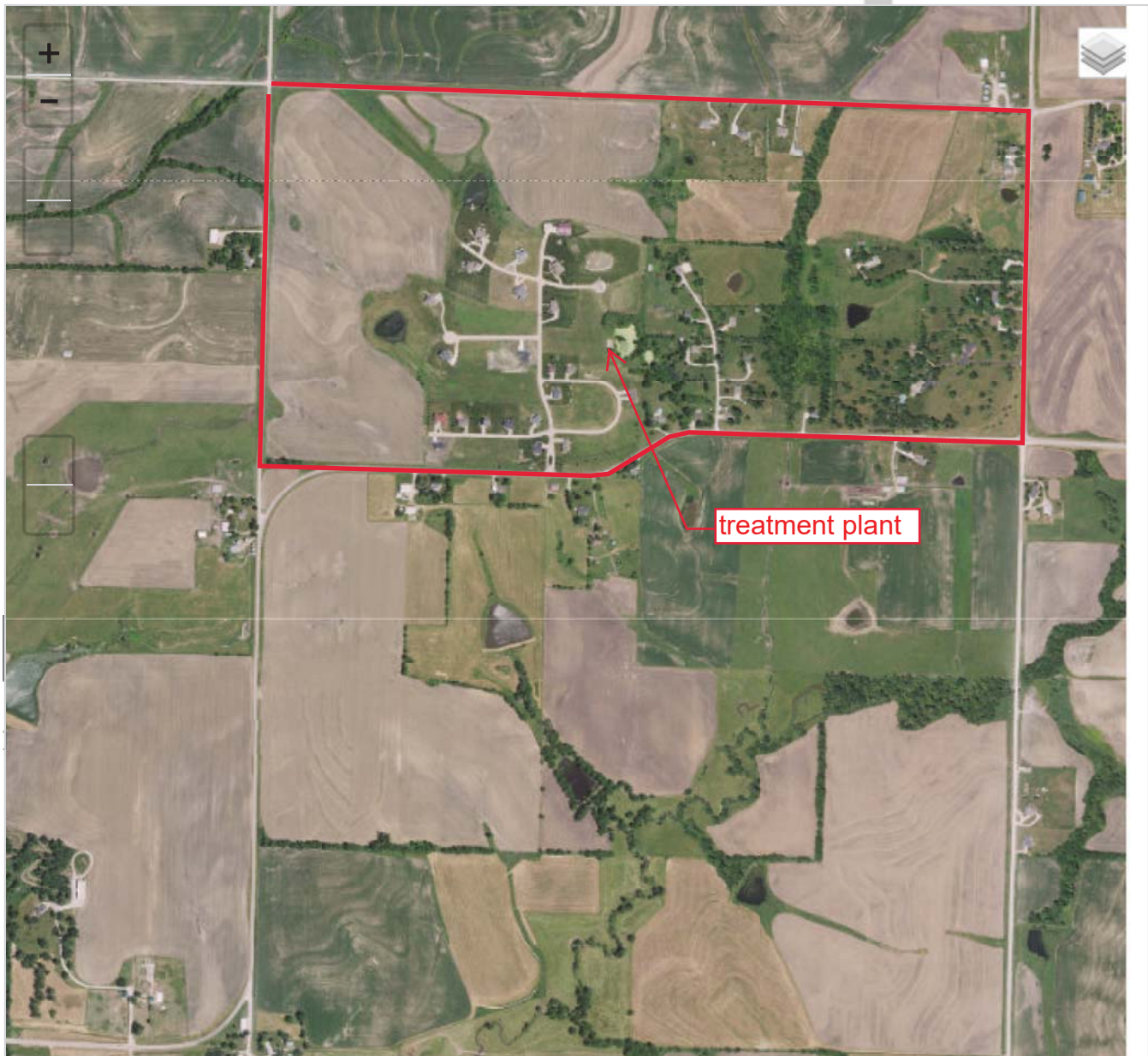
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Highland Estates

300 m
1000 ft

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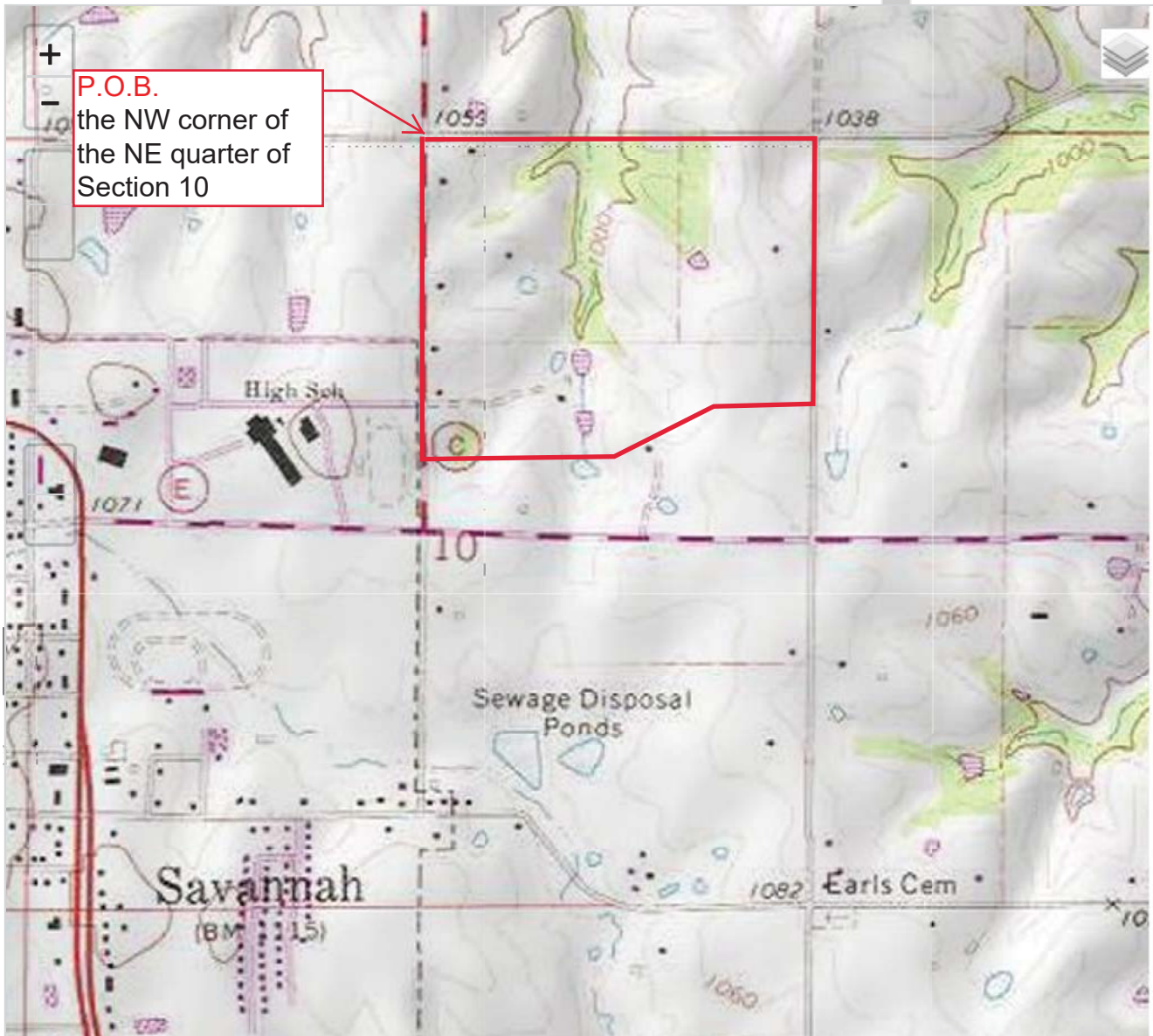
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Spring Meadows/Meadowview

300 m
1000 ft

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Spring Meadows/Meadowview

300 m
1000 ft

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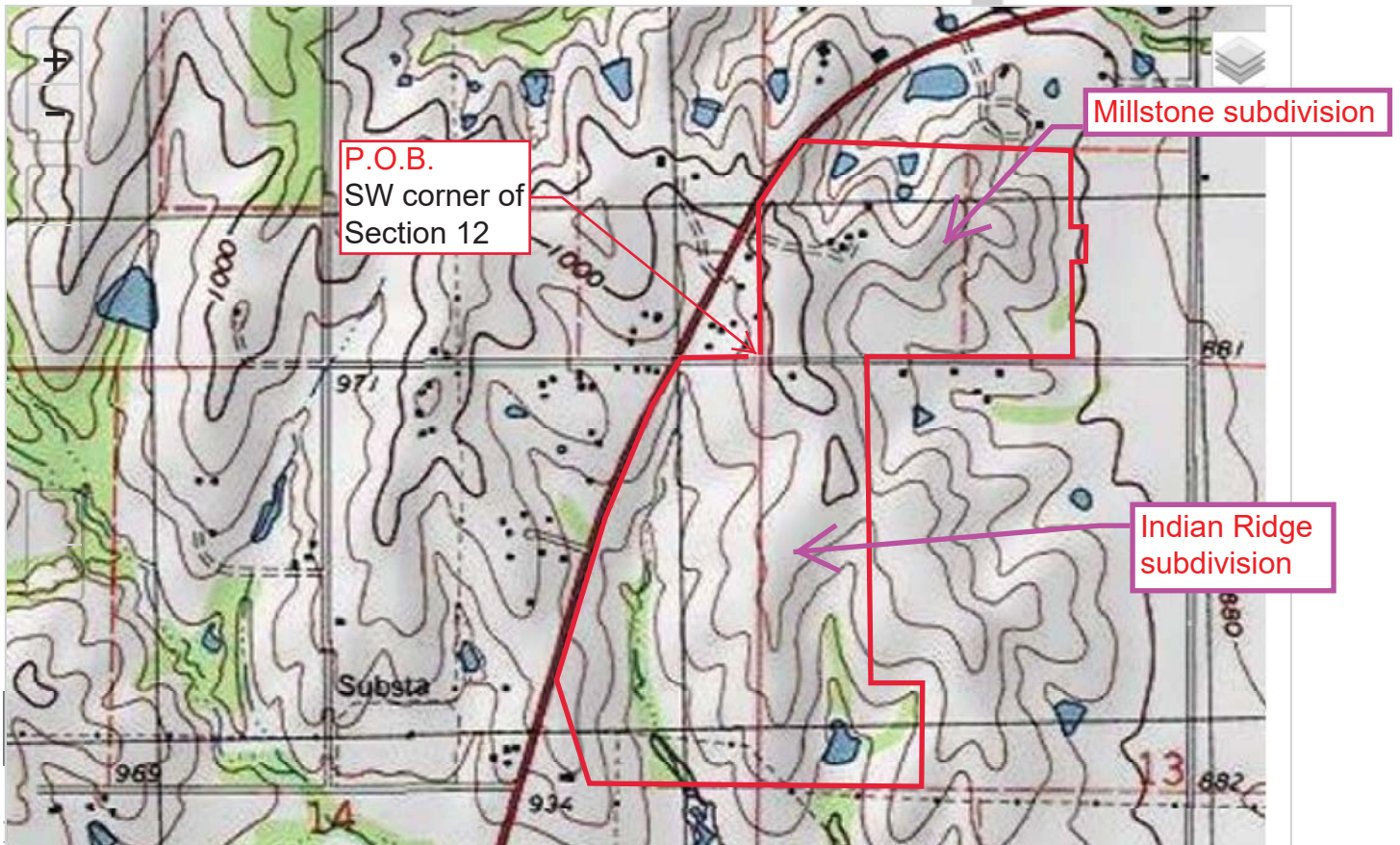
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Indian Ridge and Millstone

300 m
1000 ft

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Indian Ridge and Millstone

300 m
1000 ft

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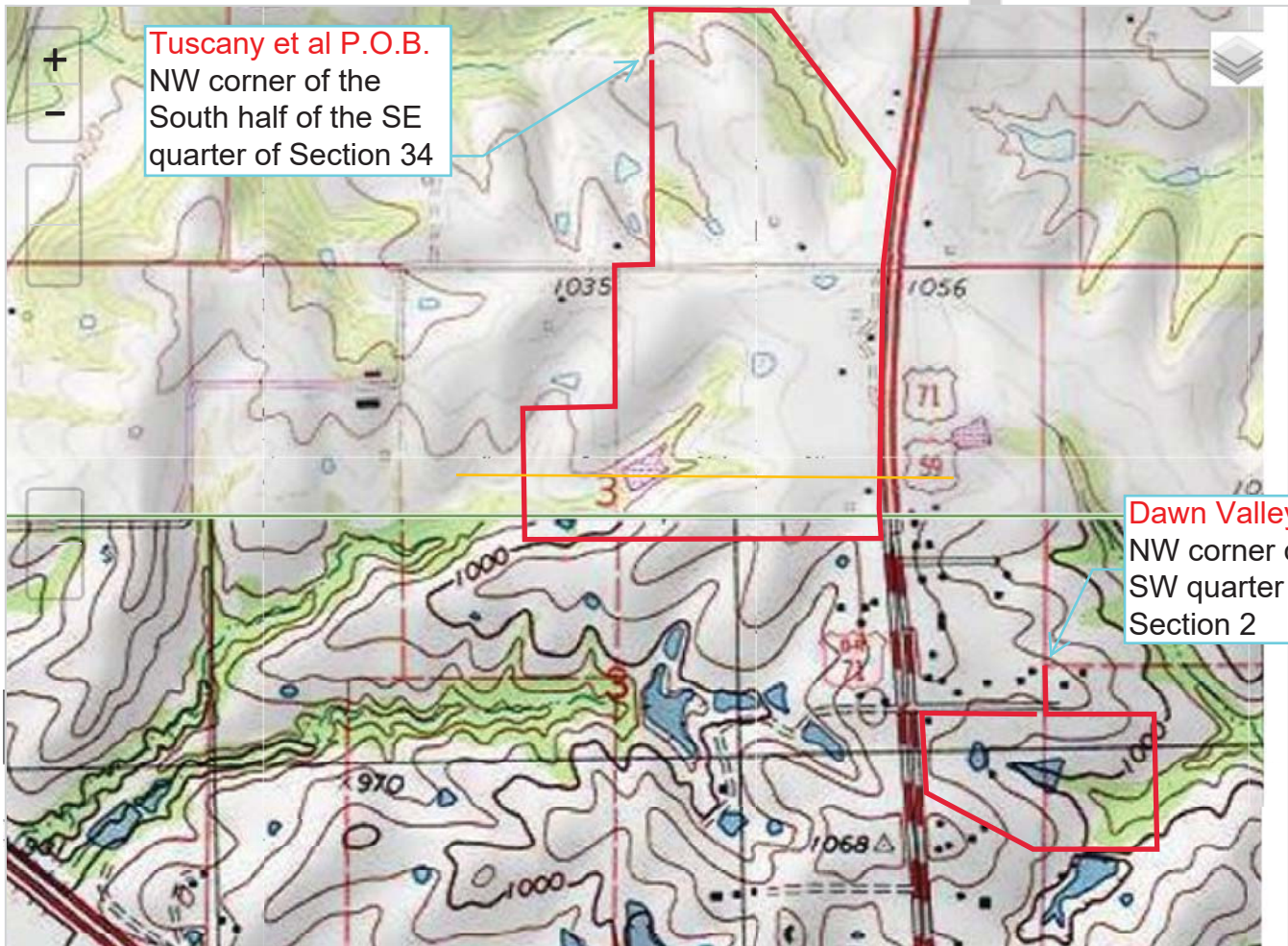
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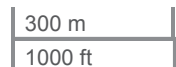
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Tuscany Lake/Vista Ridge/West Ridge/Bristol and Dawn Valley



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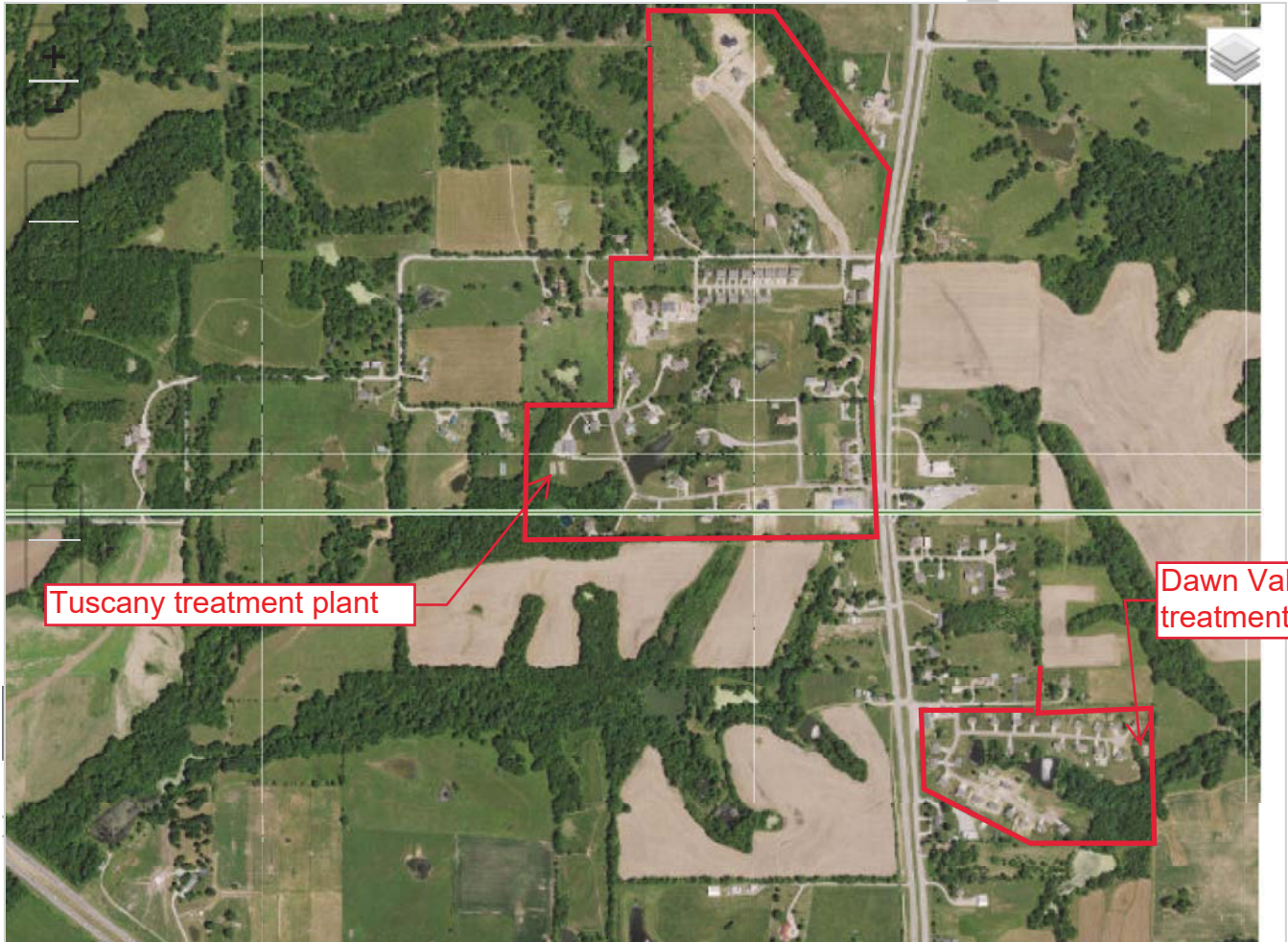
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Tuscany Lake/Vista Ridge/West Ridge/Bristol and Dawn Valley

300 m
1000 ft

United Services, Inc. - systems by location:

gpd = gallons per day

“permit” refers to the discharge permit issued by the Missouri Department of Natural Resources

the stated estimated plant customer capacity is based on residential customer water use of 180 gallons per day

MARYVILLE

Country Side View - east of Maryville – 19 residential customers
6,600 gpd (36 customer capacity), permit exp 6/23

Pleasant View Addition - east of Maryville – 7 residential and one commercial customer
10,300 gpd (57 customer capacity), permit exp 9/22 with new ammonia limits eff 11/19, has a Schedule of Compliance with DNR for discharge chlorination

Stoll Addition – southeast of Maryville – 1 commercial customer
5,400 gpd (30 residential capacity), permit exp 9/22

Scout Ridge Estates – northeast of Maryville – 19 customers
10,800 gpd (60 customer capacity), permit exp 9/22

Highland Estates - southwest of Maryville – 23 customers
12,000 gpd (66 customer capacity), permit exp 12/22 with new ammonia limits eff 10/20, has a Schedule of Compliance with DNR for discharge chlorination

SAVANNAH

Spring Meadows/Meadowview - northeast of Savannah – 30 customers
9,620 gpd 12/22

ST. JOSEPH

Indian Ridge development– northeast of St. Joseph – 70 customers
41,440 gpd (230 customer capacity), permit expired 3/18 with new ammonia limits that became effective 9/16. Plant improvements are being reviewed by DNR

Millstone subdivision – northeast of St. Joseph – 18 customers
16,650 gpd (92 customer capacity), permit exp 3/23

Tuscany Lake/Vista/West Ridge/Bristol - north of St. Joseph – 69 customers
29,120 gpd (customer capacity 161), permit exp 12/22

Dawn Valley – north of St Joseph – 33 customers
10,080 gpd (56 customer capacity), permit exp 3/23

**United Services
DEPRECIATION RATES
(SEWER)
SA-2019-0161
Class C**

<u>ACCOUNT NUMBER</u>	<u>ACCOUNT</u>	<u>DEPRECIATION RATES %</u>	<u>AVERAGE SERVICE LIFE (YEARS)</u>	<u>NET SALVAGE %</u>
311	Structures and Improvements	4.0	25.0	0%
352.1	Collection Sewers, Force	2.0	50.0	0%
352.2	Collection Sewers, Gravity	2.0	50.0	0%
354	Services to Customers	2.0	50.0	0%
355	Flow Measuring Devices	3.3	30.0	0%
362	Receiving Wells (Pump Pits)	4.0	26.0	-5%
363	Pumping Equipment	10.0	10.0	0%
372	Oxidation Lagoons	4.0	25.0	0%
373	Treatment & Disposal Facilities	5.0	22.0	-10%
373.1	STEP System	5.6	18.0	0%
374	Plant Sewers	2.5	40.0	0%
375	Outfall Sewers	2.0	50.0	0%
391	Office Furniture and Equipment	5.0	20.0	0%
392	Transportation Equipment	13.0	7.0	9%
393	Other General Equipment	10.0	10.0	0%

