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Decision No. 85492

ORIGINAL

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DONALD J. BARNES,

Complainant,

vs.

LILLIAN SKINNER and ROY SKINNER, dba LEWISTON TRADING COMPANY and LEWISTON LODGE,

Defendant.

Case No. 9881
(Filed March 3, 1975)

John L. Loomis, Assistant District Attorney, Trinity County, for Donald J. Barnes, complainant.
Roy Skinner, for himself, defendant.
Alexander Chocas, for the Commission staff.

O P I N I O N

Statement of Facts

Complainant Donald J. Barnes (Barnes), Trinity County Public Health Sanitarian, alleges that Lillian and Roy Skinner (Skinner), doing business as Lewiston Trading Company and Lewiston Lodge, own, operate, and manage a water and sewer public utility within the meaning of Public Utilities Code Sections 216, 241, 2701, 230.5, and 230.6.

The complaint further alleges that Skinner has failed to comply with the provisions of Public Utilities Code Sections 489, 491, and 451, in that Skinner respectively has failed to file and make available rate schedules, has changed rates unilaterally, and charges unjust and unreasonable rates.

Barnes asks that Skinner be required to file rate schedules, make restitution for any past charges found to be unjust, file reports required under provisions of the Public Utilities Code, and maintain adequate, safe, and efficient water and sewer services.

In answer, Skinner contends that under provisions of Public Utilities Code Section 2704(c), he is not subject to the jurisdiction, control, and regulation of the Public Utilities Commission in that he does not operate the water and sewer systems for profit, but rather merely provides the services as a matter of accommodation to neighbors to whom no other service of water or sewage disposal is equally available. Skinner contends that although both systems operate at a substantial loss, they are operated and presently maintained adequately, with repairs, replacements, and additions made as necessary to provide service, and to protect the safety and health of recipients of the services.

Lewiston Lodge, as the Skinner properties are now styled, was originally laid out and constructed in 1957 to provide family housing accommodations for construction personnel of the Guy F. Atkinson Company working on construction of the Trinity Dam. It was designed to provide accommodations for about 400 persons in approximately 25 homes and 80 trailer homes. The tract on a slope is roughly "L" shaped, and fronts on one side onto Trinity Avenue. The Skinner residence, occupied summers and weekends for about one-half of the year, is situated on the upper side of the slope and overlooks the rest of the tract. Below the Skinner residence there are presently about 30 barracklike two- and three-bedroom frame houses in various states of repair, nine more or less permanently ensconced small mobile trailer homes, one wooden A-frame house, and a utility and laundry building. The lower third of the tract, except for five lots fronting on Trinity Avenue, presently

supports no structures. The rectangular street grid consists of heavily pot-holed, poorly maintained, thirty feet wide dirt and gravel roadways bordered by drainage ditches, all pretentiously adorned with city style metal pole street identification signs.

Skinner acquired the property in 1962 and began thereafter to rent the houses on the tract. In 1968 he began selling some of the houses. To date seven have been sold. The remainder are mostly rented, with monthly rentals approximating $135-$140. Initially, water and sewer services were provided without charge. However, in February 1973 Skinner began to charge both owners and renters a flat monthly rate per service of $7.50 for water and $2.50 for sewer.

The water and sewer systems were installed as part of the original construction in 1957, and apparently were built to labor camp standards acceptable in 1957.

The water supply is drawn from just below a fish hatchery on the Trinity River through an engineered infiltration gallery-type intake, and is carried through pipe about 500 yards to a 25,000-gallon capacity clear well storage tank. There it is automatically treated by a chlorinator. From this sump-like clear well storage tank the water is lifted by a 40-hp deep well turbine pump with an approximate 500-gallon per minute capacity to two ground level steel storage tanks located at top of the slope above the tract service area. The combined capacity of the two storage tanks is about 80,000 gallons. The tanks are piped and valved to provide flexible operation; either tank can be used independently, or in series, or parallel with the other.

From the water storage tanks, water flows by gravity through an 8-inch thin wall steel pipe to the tract area, and thence through the tract distribution system, utilizing 6-inch, 4-inch, and 2-inch piping with ultimate home service in 3/4-inch pipe. There are no

meters. Admittedly the piping is in poor condition, particularly in certain areas where electrolysis has caused numerous breakdowns. One witness, a resident who purchased his home in 1969, testified that during the past year breakdowns in his service had occurred as frequently as twice a month, the most recent outage being September 3, 1975. The witness also produced a small glass jar containing a water sample allegedly taken from his home tap within a half hour after service was restored September 3, 1975. When shaken, small particles of what appeared to be rust or clay appeared in suspension. The witness complained of repair ditches having been left open for as long as four days, and stated that repairs were usually made by application of repair clamps and patches. While acknowledging use of clamps and patches, Skinner stated that since 1971 he has been replacing pipe in the worst electrolysis areas with polyvinyl chloride (pvc) pipe.

The sewage system was constructed of Orangeberg piping, and the collection system flows by gravity down slope to a two-compartment septic tank with an inlet diversion box at the low point of the collection system. The septic tank effluent flows by gravity into the wetwell of an adjacent pumping station where an electric pump with automatic float control lifts the effluent through a force main to two oxidation percolation ponds.[1/] There are three additional oxidation percolation ponds available on standby. These ponds are reportedly leased by Skinner for that purpose.

Unfortunately, when the water and sewer systems were originally constructed, the water and sewer mains, separated 13 inches vertically, were laid in the same trench. Over the years, as a result of repeated leakage and breakages, with apparent resultant

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1/ A manually activated gasoline engine driven pump is provided for emergency use as backup.

subsidence after repairs and overhead pressures from trucks passing over less compacted road areas, in some places the water pipes now rest directly on top of the sewer collection pipes. Surface runoff water tends to collect and stand in any ditches or open trenches. Barnes testified as to his professional concern over danger of possible contamination of the water system should a sewer pipe leak in an area where the water pipe should also be defective--particularly during shutdowns of the water system when water pressure is therefore off. On the other hand, Skinner's engineer testified there was little risk of a reverse invasion of the water system in that the sewer system being a gravity flow system develops no pressure. Skinner testified that the water has been tested regularly for years by the Shasta Laboratory and has shown no contamination.2/

Skinner and his engineer testified that acquisitional costs in 1962 for the systems were $73,530 for the water system and $29,850 for the sewage system. His operational costs assertedly are

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2/ The Examiner held the record open to receive, and Skinner submitted, 28 Xeroxed copies of lab reports from Shasta Laboratory of Redding, California. These purport to evidence test results of samples taken at irregular times over the period 11/28/71-4/7/75, at various locations (some stated, others not) at Lewiston Lodge. Except for one report (of the sample taken 2/11/72) all reports bore the summation: "This sample shows no evidence of coliform contamination." (See Exhibit No. 8.)

$7,300 per year[3/] plus taxes of $45 against operating revenue of only $3,000. Skinner testified that the operational loss is absorbed each year by his trading company from rentals derived from the houses and trailer units. Skinner asserts that the only way the system could pay its way would be for him to extensively expand and subdivide. But he cannot do this without obtaining permits from various authorities; permits denied him until expensive re-engineering and reconstruction of the systems is accomplished. Accordingly, at present he does not plan to subdivide or expand. The staff agreed that the present system cannot be profitably operated without further subdivision to obtain new revenues.

A public hearing was held September 11, 1975 before Examiner Weiss at Weaverville, and the case was submitted September 16, 1975 upon receipt by the Examiner of the Shasta Laboratory reports on the water.

3/ Lewiston Trading Co. - Balance Sheet Accounts 1974, as submitted list these operational expenses:

	Water System	Sewer System
Power	$1,548.86	$ 124.34
Labor	1,200.00	600.00
Standby Labor	90.00	30.00
Materials	200.00	150.00
Contract Maintenance	121.00	85.00
Management Salaries	480.00	300.00
Office Supplies	140.00	140.00
Insurance	34.75	34.75
Accounting & Legal Exp.	210.00	210.00
Uncollectible Accts.	75.00	25.00
Vehicle Expense	510.00	510.00
Office/Storage Rent	265.00	235.00
	$4,874.61	$2,444.09

(See Exhibit No. 4.)

Discussion

In this complaint, as is unhappily so typically the problem in matters involving small uneconomic water supply utilities, we are faced with the virtually unsolvable--a literal modern day Gordian knot--how to provide a supply of water economically? The consumer public looks to the Commission and expects it to force the utility to give adequate, safe, and suitable service at low rates. It is the plain duty of this Commission to protect the consumers' interests. But at the same time, and at law equally entitled to consideration, the small utility also has legitimate expectations, and enforceable rights in the scales of justice. Although devoted to public service, a utility is entitled to a fair and reasonable return for the services it provides as well as for its investment in plant and facilities, and cannot be required to operate at a loss.4/

Initially the case at bar poses the question whether Skinner is a public utility at all. Admittedly Skinner owns and operates both a water supply and sewage disposal system, and for compensation provides these services to the inhabitants of his tract--the Lewiston Lodge property. But the inhabitants of the tract fall into two categories. The first category is comprised of Skinner's own tenants. The second category is comprised of those certain members of the general public who purchased their plots of land and dwellings from Skinner. It is Skinner's contention that inasmuch as the services

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4/ A rate which causes a utility to operate at a loss is said to be "confiscatory" and a taking of the property of the utility without due process. The traditional approach has been to determine the original cost of the property of the utility devoted to the public use (rate base), and then to apply a reasonable rate of return to that rate base.

are furnished basically for his own tenants, and only as an alleged accommodation to the seven general public inhabitants who purchased their dwellings from him, and who have no other means to receive such services, and inasmuch as the services are not operated for profit, he is not a public utility, and therefore not subject to the jurisdiction, control, and regulation of the Public Utilities Commission.

We would agree with Skinner that one who provides these services to his own tenants is not a "public utility". Such a service would employ the landlord's property solely in a manner wholly subsidiary and ancillary to a private enterprise, and would not serve to invest the wholly private nature of that arrangement with the unrestricted offer of service which is essential to a public use.[5/] That a business may be affected with a public interest does not in and of itself make it into a "public utility". The Public Utilities Code defines a "public utility" as including every "...water corporation, sewer system corporation...where the service is performed for or the commodity delivered to the public or any portion thereof",[6/] and states further that "any person, firm...owning...any water system ...who sells...water to any person...is a public utility..."[7/] However, years ago the California Supreme Court in Del Mar Water etc. Co. v Eshleman ((1914) 167 C 666, 680) stated "Even a constitutional

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5/ Story v Richardson (1921) 186 C 162.

Where a 12-story office building generated its own electrical energy and steam. In 1916 the building owners, aside from supplying their own tenants, supplied electrical energy and steam to certain individuals not tenants, but occupying property in the vicinity. The Court found that inasmuch as the office building property was employed solely in a private enterprise, the consummation of the special sales to nontenants did not serve to bring the otherwise private operation within the scope of the Public Utilities Act.

6/ Public Utilities Code Section 216(a).

7/ Public Utilities Code Section 2701.

declaration cannot transform a private enterprise or a part thereof into a public utility and thus take property for public use without condemnation and payment."[8/] Consequently, definitions of public utilities contained in the Public Utilities Act must be construed as applicable only to properties as have, in fact, been dedicated to a public use, and not as an effort to impress with a public use properties which have not been devoted thereto. (Allen v Railroad Commission (1918) 179 C 68, 89.) Thus in the case before us had Skinner restricted provision of these services to his own tenants, the facilities would not, in fact, be devoted to a public use and he would not be a "public utility".

But Skinner has sold dwellings and lots in his tract to members of the general public with part of the inducement to purchase being the ready availability of water and sewer services.[9/] The principal determinative characteristic of a public utility is that of service to, or readiness to serve, an indefinite general public (or a portion of the public as such) which has a legal right to demand and receive service.[10/] From the foregoing it is clear there must

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8/ Whether this holding of the California Supreme Court still has vitality, in view of Nebbia v New York (1933) 291 US 502, is an open question. In view of our decision, it is not necessary to address this question.

9/ Witness Ed O'Donnell, one of the purchasers, testified that when in June 1969 he contracted with Skinner to purchase his dwelling at 400 Second Street in the tract it was represented that water and sewer services were part of the "deal", and he was asked by Skinner "Where else can you get free water and sewer for the rest of your life?"

10/ Story v Richardson, supra at Footnote 5, where at page 167 the Court, citing other jurisdictions, noted:

> "The test is...whether the public has a legal right to the use, which cannot be gainsaid, or denied, or withdrawn, at the pleasure of the owner." (Farmers' Market Co. v Philadelphia etc. R. R. Co. (1891) 21 A 989.) "The essential feature of a public use is that it is not confined to privileged individuals, but is open to the indefinite public. It is this indefiniteness or unrestricted quality that gives it its public character." These "tests" have never been overruled, despite their marked circularity. (Thayer v California Development Co. (1912) 164 C 117, 127.) And to the point that the dedication concept is still viable in California public utility law, see Cal. Community Television Ass'n. v Gen. Tel. Co. (1970) 71 CPUC 123.

be an intention to dedicate, or actual dedication, of a business (or a part thereof) to the public use in order to constitute the business a public utility. But a dedication may be either express or implied, and no ceremony is necessary, no deed is needed to evidence the dedication, and no grantee in esse to take title is required,[11/] and the question whether an organization engaged in furnishing services to the public is a "public utility" does not depend upon the number of people served.[12/] In general, where dedication to a public use is sought to be established from either the acquiescence of the owner in the use by the public, or from acts or declarations of an equivocal character which are consistent with a dedication to public use, the intention of the owner is unquestionably of controlling importance in determining whether there has been dedication by the owner to public use or not. But where the dedication is clearly manifested by unequivocal acts or declarations, upon which the public, or those interested in such declarations, have acted, the fact that the owner may have entertained a different intention from that manifested by his acts or declarations is of no consequence. Therefore, where, as here, the owners of a tract of land cause a plan of subdivision to be made showing streets and utilities and other common portions set aside for the use of the public, and the successor owner in interest in turn offers some of this land for sale to the public, according to the plan and including the utilities; induces members of the public to purchase dwellings and lots in the tract by offering water and sewer utilities; and thereafter continues to furnish services to the purchasers for compensation, there has been a dedication of these

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11/ Smith v Shiebeck (1942) 24 A 2d 795, 800.

12/ Coml. Communications v Public Utilities Comm. (1958) 50 C 2d 512, 523.

utilities to the public use.[13] And thereafter the purchasers of these dwellings and lots have a legal right to continued access and use of these public utilities and the owner of the tract is estopped from preventing the purchasers from continuing the use.[14] By actions of the owners of the tract, the private facilities have been dedicated to the public and henceforth are public utilities within the jurisdiction, control, and regulation of this Commission.

Skinner next contends that pursuant to Public Utilities Code Section 2704(c),[15] he is merely providing water and sewer services as a "matter of accommodation" to the seven purchasers and thus is not subject to the jurisdiction of the Commission. Apart from the fact that Section 2704(c) has application only to water supplies, and that there is no similar escape section comparable to Section 2704(c) available to sewer system owners, it also cannot be applicable in a water supply situation such as the one at bar where the nontenant purchasers take water not as an accommodation, but rather as a matter of right as previously discussed. While no deeds were introduced into evidence, witness O'Donnell testified that one of the inducements in 1969 was the stated availability of water and sewer services--as well as the further allegation that such were to

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13/ Rose v Campbell (1961) 58 CPUC 754; Philadelphia Elec. Co. v City of Philadelphia (1931) 154 A 492, 496; Esposito v Gandet (1942) 8 So. 2d 783, 785; Harlan v Town of Bel Air (1940) 13 A 2d 370; Ten Brock v Miller (1927) 216 NW 385; and Wynn Motel Hotel v City of Texarkana (1950) 230 SW 2d 649, 652.

14/ Franscioni v Soledad Land & Water Co. (1915) 170 C 221.

15/ Public Utilities Code Section 2704(c) provides:

> "Any owner of a water supply not otherwise dedicated to public use and primarily used for domestic or industrial purposes by him..., who...(c) sells or delivers a portion of such water supply as a matter of accommodation to neighbors to whom no other supply of water for domestic... purposes is equally available, is not subject to the jurisdiction, control, and regulation of the Commission."

be free. Skinner did not deny the inducement; rather he denied that he would ever have promised lifetime free water and sewer services. Accordingly, we must find that the escape provisions of Public Utilities Code Section 2704(c) are not available to Skinner.

The next issue under consideration is that of the reasonableness of the rate structure. Here we finally face that modern-day Phrygian puzzle: Where is the money to come from? The Skinner water and sewer systems, although generally operational thus far, are about as horrendous an example of utility layout as one could find. To meet current sanitation codes and practices the entire water distribution system should be laterally relocated so as not to be juxtaposed with the sewer collection lines. This would be prohibitively expensive for this system. There is much waste of water, a considerable portion attributable to the aged and deteriorated condition of much of the water delivery piping. To replace defective or deteriorated pipe would also involve very substantial amounts of money in terms of this system, although since 1971, as replacement of steel pipe is absolutely compelled as a consequence of the ravages of electrolysis in certain areas, Skinner has been installing replacement polyvinyl chloride (pvc) piping. There are a host of refinements and practices involving both the water delivery and sewer systems which would be desirable, but they all cost money. Skinner charges $7.50 and $2.50 per month, respectively, for residential water and sewer service to both tenants and owners. In 1974 these flat rate schedules produced revenues of approximately $3,000--less than half of the alleged operating expenses.[16/] Even though the operating expenses incurred as reported by Skinner are in part highly subject to inquiry and would

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16/ See Footnote 3 for detailed listing.

merit close scrutiny, containing many mere estimates and some dubious allocations, it is noteworthy that the PG&E power expense alone totaled $1,673.20, and lease expenses for the sewer system oxidation percolation ponds, etc., another $500. Complainant and staff made no objection nor much comment on the operating figures. Indeed it would have been pointless in this case to pass much time on them. All the parties recognized that this system as presently constituted, and with current rates, cannot possibly meet expenses much less pay any return on investment. The only happy feature in the encire situation is that there is an abundance of water (unlike the situation in most water cases before this Commission), and, except for the approximately twice monthly breakdowns, it generally is readily available at the tap. The water--with one exception of short duration in 1972--has consistently tested safe, and there was presented no credible evidence challenging its potability.[17/] The sewer system works despite past overflow problems stemming from maintenance shortcomings, but these problems apparently caused no shutdowns in the homes but rather were process plant problems.

Unreasonable rates from the aspect of complainant are those which are so much higher than simply compensatory rates that they are exorbitant.[18/] Such is clearly not the case here. Operating income does not even approach compensating the operator for operating

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17/ We do not place much relevance in the sample brought to the hearing as any water system back on stream after a breakdown might well have foreign matter in suspension a mere half hour after restoration of service.

18/ Homestead Co. v Des Moines Electric Co. (1918) 248 F 439.

expense much less provide a return on investment.[19] When generally compared with rates in effect elsewhere in similar size utilities in California, they do not appear exorbitant.[20] Under the totality of this factual matrix, we cannot find that the rates charged are unjust and unreasonable under the thrust of Public Utilities Code Section 451. Thus, it resolves that there are no past unjust charges to be restituted to the public as reparations.

In the interest of safety, the Commission would require that a periodic testing program be immediately instituted, with testing at least monthly. In the event of any significant contamination being detected, Skinner should be required to immediately advise the County Health Sanitarian.

While no one can find satisfaction with the outcome of this case, we believe it the best resolution available under the difficult circumstance. To shut down these utilities would serve only to immediately deprive over one hundred persons of obviously limited means of their homes and cast them adrift in a sparsely populated mountain area ill-equipped to absorb them. The situation is far from ideal but it is not impossibly onerous.

19/ The only way these systems might possibly become economically viable would be were the tract to be further developed to its designed capacity. The tract plan calls for approximately 70 additional trailer units with water and sewer facilities already in situs. The systems were engineered for a capacity of about 400 persons and therefore could readily absorb such additional demand with little additional operating expense (but subject to the same potential infirmities of age and location as the portions already in use). The additional revenue would serve to bring the financial aspect more in balance. However, it is highly unlikely that the county health and planning authorities would grant approval of such development without major relocations and revisions of the water distribution system which could only be achieved by substantial new cash investment.

20/ Complainant proposes rates proportionate to usage. Meters would be required to achieve this objective, and, again, the investment money is just not there.

Our determination that this entity is a public utility water company is reached reluctantly and is based solely on compelling legal authorities. We can find no advantage from our assumption of jurisdiction over this operation. As the foregoing discussion makes clear, the nature and extent of the problems of this "utility" make meaningful regulation impossible. We believe that the problems of small water companies require a legislative solution.

Findings

1. Defendants own, manage, and operate water supply and sewer disposal systems servicing defendants' partially developed housing and trailer facilities tract known as Lewiston Lodge. Defendants have no certificate of public convenience and necessity.

2. Defendants rent most of the housing and trailer facilities, but since 1968 have sold seven of the homes in the tract.

3. In offering the sold homes to the public, defendants induced purchase by associating water and sewer facilities with the offered properties. Buyers now receive water and sewer services as a matter of right, and not as an accommodation.

4. Defendants initally provided water and sewer facilities free, but in 1972 began to charge tenants and property owners $7.50 and $2.50 per month, respectively, for water and sewer services.

5. By these acts of inducement and subsequent furnishment of water and sewer services for compensation, defendants, as to the property owners, have dedicated the water and sewer systems to the public use and meet the definitions of water and sewer corporations as set forth in Public Utilities Code Sections 241 and 230.6.

6. Defendants do not have tariffs on file with this Commission as required by Public Utilities Code Section 489.

7. When constructed in 1957 the water distribution and sewer collection systems were placed, vertically separated, in the same trench. Because of various causes, in some places the two systems' pipes are now in juxtaposition, imposing a possible potential health hazard.

8. While portions of the water system are in good condition, the water distribution lines, because of aging and electrolysis conditions in certain areas, have suffered substantial deterioration resulting in numerous breakdowns.

9. Despite these problems and infirmities, the water delivered has consistently tested as free of contamination (except for one occasion in 1972).

10. Operation of the water and sewer system, restricted to the present clientele, does not and cannot generate sufficient revenues to render the utilities economically viable and able to maintain the system. Defendants have subsidized operations at all times.

11. Defendants' present rates appear not unreasonable under all these circumstances.

Conclusions

1. Defendants are a public utility.

2. Defendants should be required to file tariffs, one set for water service and one set for sewer service, with the Commission pursuant to Public Utilities Code Section 489, and henceforth to comply with Public Utilities Code Section 584.

3. Defendants' present rates for each service are not unreasonable and do not violate Public Utilities Code Section 451. Complainant's request for reparations is denied.

4. Defendants should make no changes to their present rate structure for water service and sewer service except in conformity with Public Utilities Code Section 491.

5. Defendants should establish a monthly water testing program. In event of significant contamination, defendants should immediately advise the Trinity County Health Sanitarian of the fact.

6. Defendants have no right to expand either water service or sewer service into contiguous territory beyond the tract known as Lewiston Lodge until and unless they are granted a certificate of public convenience and necessity by this Commission.

7. No certificate should be issued unless the systems can be reasonably shown to be economically viable.

O R D E R

IT IS ORDERED that:

1. The reparations relief requested is denied.

2. After the effective date of this order, defendants shall file two sets of tariff schedules, one set for sewer service and one set for water service. Each set will consist of rate schedules, as attached hereto as Appendix A, service area map, rules, and copies of printed forms to be used in dealing with customers. Such filings shall comply with General Order No. 96-A and shall become effective four days after filing.

3. Defendants shall not extend service beyond the presently existing boundaries of Lewiston Lodge for either sewer or water service without authorization of the Commission.

4. Defendants shall prepare and keep current system maps of both sewer and water facilities as required by Section I.10.a. of General Order No. 103. Within six months after the effective date of this order, defendants shall file with this Commission two copies each of maps for each system.

5. Defendants shall set up formal books of accounting in conformity with the Uniform System of Accounts for Class D Water Utilities as prescribed by this Commission and record therein the appropriate charges to plant accounts.

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6. Defendants shall establish a monthly water testing program. In event of significant contamination, defendants should immediately advise the Trinity County Health Sanitarian of the fact.

The effective date of this order shall be twenty days after the date hereof.

Dated at San Francisco, California, this 2nd day of MARCH, 1976.

President

Commissioners

Schedule No. 1

GENERAL SERVICE

APPLICABILITY

Applicable to General Sewer Service.

TERRITORY

In the town of Lewiston and vicinity, Trinity County.

RATE	Per Month
For each connection	$2.50

SPECIAL CONDITION

The above rates apply to service connections not larger than four inches in diameter.

Schedule No. 2R

RESIDENTIAL FLAT RATE SERVICE

APPLICABILITY

Applicable to all flat rate residential service.

TERRITORY

In the town of Lewiston and vicinity, Trinity County.

RATE

	Per Month
For each connection	$7.50

SPECIAL CONDITION

The above residential flat rates apply to service connections not larger than one inch in diameter.