

Control Number: 47897



Item Number: 200

Addendum StartPage: 0

APPLICATION OF FOREST GLEN § PUBLIC UTILITY COMMISSION BEFORE THE
UTILITY COMPANY FOR § FILING CLERK
AUTHORITY TO CHANGE RATES § STATE OFFICE OF
ADMINISTRATIVE HEARINGS

**RESPONSE TO COMMISSION STAFF'S REQUEST FOR ADDITIONAL
INTERVENTION DATE**

COMES NOW, Forest Glen Utility Company ("FGU" or "Applicant") and files this Response to Commission Staff's Request for Additional Intervention Date, and in support thereof, would respectfully show the following:

I. BACKGROUND

On December 21, 2017, FGU filed an application with the Public Utility Commission of Texas ("Commission") to amend its tariff and change its rates for sewer Certificate of Convenience and Necessity ("CCN") No. 21070 in Medina County. The Notice of Proposed Rate Change or Statement of Intent issued by FGU on December 27, 2017, established an effective date of the rate change of February 1, 2018. On January 31, 2018, at Commission Staff's urging but without any adjudication, the Commission Administrative Law Judge ("ALJ") issued Order No. 2 finding the application administratively incomplete and suspending the effective date of the rate increase (for that reason). FGU filed a Response to Oral Comments made by the Commission Staff on February 23, 2018. On March 27, 2018, the Commission ALJ issued Order No. 3 finding FGU's application to be administratively complete and continuing the suspension.¹ Having also received protests by more than ten percent of Applicant's customers, the Commission ALJ issued an Order of Referral on April 3, 2018, which referred the application to the State Office of Administrative Hearings ("SOAH") to conduct a hearing.

¹ The suspension went into effect on January 21, 2018 when the Commission ALJ issued Order No. 2.

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On April 12, 2018, SOAH issued Order No. 1 describing the case and requiring FGU to provide notice of the Prehearing Conference at least 20 days prior to the hearing to each affected municipality, county and ratepayer. On May 2, 2018, FGU filed an affidavit with the Commission that it had provided the required notice of Prehearing Conference on April 27, 2018.² The Prehearing Conference was held by the SOAH ALJ on May 18, 2018 and memorialized in SOAH Order No. 2 which also set out the procedural schedule.

Before the Draft Preliminary Order was issued, during the Commission Open Meeting on May 25, 2018, Commissioners stated that a Final Preliminary Order would not be issued until FGU provided an updated Statement of Intent establishing a new effective date of the rate increase. Accordingly, FGU provided the new Statement of Intent (affidavit, notice of proposed rate change, and ratepayer protest form) on June 1, 2018.³ The Commissioner's action established July 6, 2018 as a new effective date of the increased rate -- 35 days from the second notice.⁴ On June 14, 2018, the Commission issued a Preliminary Order listing issues to be addressed in this docket but otherwise remaining silent on the end of the suspension period or any additional requirements triggered by the new Statement of Intent.

On June 28, 2018, Commission Staff filed a Request for Additional Intervention Date ("Request") taking the position, in part, that FGU's new Statement of Intent is proper.⁵ This response it timely filed.

II. AUTHORITIES

Texas Water Code ("TWC") § 13.1871(n) addresses intervention by ratepayers:

(n) The utility shall mail notice of the hearing to each ratepayer before the hearing. The notice must include a description of the process by which a ratepayer may intervene in the ratemaking proceeding.⁶

² FGU Affidavit, PUC Interchange Filing No. 105 (May 2, 2018).

³ Statement of Intent, PUC Interchange Filing No. 125 (June 1, 2018).

⁴ *Id.*

⁵ Commission Staff's Request for Additional Intervention Date at 2 (footnote no. 4) (June 28, 2018).

⁶ TWC § 13.1871(u).

PUC's regulation implementing TWC § 13.1871 at 16 Texas Administrative Code ("TAC") § 24.22(d)(2)(B) is virtually identical:

(B) The utility shall mail notice of the hearing to each affected ratepayer at least 20 days before the hearing. The notice must include a description of the process by which a ratepayer may intervene in the proceeding.⁷

Neither the Chairman's May 24, 2018 memorandum, the Preliminary Order, nor other Commission rules address the process for ratepayer intervention for Class B utilities.⁸ Indeed, no statutory or regulatory provisions expressly address ratepayer intervention when the Commission has ordered a second Statement of Intent and a second effective date of rate increase.

III. ARGUMENT

The Commission's recent requirement (announced during Open Meeting) to issue a new Statement of Intent establishing a new effective date of the rate increase is unprecedented. This action, in turn, raises the question of what additional procedural requirements were triggered by the Commission's directive, if any. In other words, must new notice of hearing, procedures to request another round of intervention, and/or a new prehearing conference be held all because the Commission ordered a new Statement of Intent? The short answer is no.

Although the use of the word "hearing" in TWC § 13.1871(n) and 16 TAC § 24.22(d)(2)(B) is not specific and could mean the whole series of hearings that may occur (from preliminary to evidentiary), it is generally understood that the singular "hearing" referred to in TWC § 13.1871(n) and 16 TAC § 24.22(d)(2)(B)⁹ is the prehearing conference. That is, there is no requirement to notify ratepayers of the process to intervene outside the prehearing conference or more than once.

⁷ 16 TAC § 24.22(d)(2)(B).

⁸ Under TWC § 13.002(4-c), FGU is actually a Class C utility. However, pursuant to § 13.1872(c)(2), because FGU is seeking more than a price index adjustment, it is treated like a Class B utility under § 13.1871 for rate making purposes.

⁹ Note that while 16 TAC § 24.22(c)(1)(B) requires notice of intervention procedures earlier at the notice of application stage for larger TWC § 13.187 utilities, Class B utilities (and those Class C utilities requesting rate increases) need only apprise ratepayers at the notice of hearing stage 20 days prior to the prehearing conference per 16 TAC § 24.22(d)(2)(B).

Clearly notice of the prehearing conference has already been given and the hearing held. There has been no claim that notice of that May 18, 2018 hearing was deficient. However, now without statutory or regulatory support, the PUC Staff claims that a second notice apprising ratepayers of the process to intervene (and additional opportunity to intervene) is warranted because the PUC Staff originally called the application “insufficient,”¹⁰ but then reversing their position by submittal of their supplemental recommendation on completeness.¹¹ First, putting aside that the Commission (not CADM or Staff) never formally found the FGU application was substantially incomplete, let alone incomplete,¹² and FGU was merely providing answers to Staff’s oral questions about the application voluntarily,¹³ Staff’s request would create a new notice and opportunity for intervention process whole cloth. Again, this is unprecedented and unjustified.

Staff appears to justify a new opportunity for intervention by opining that individuals who did not intervene earlier, “may reconsider upon receiving additional information provided in a new statement of intent.”¹⁴ A quick comparison of the two Statements of Intent, notarized on December 27, 2018 and May 30, 2018 respectively, however, show the notices are virtually identical. Apart from different signature dates and affiants, the billing comparison, protest instructions, and side by side comparison of the change to the fixed monthly charge are all the same.¹⁵ There is no new or different information conveyed in the May 30 notice that a ratepayer receiving the December 27 notice would not have received – the rate is still being increased from \$35 per month to \$65 per month. Furthermore as Staff knows, a Statement of Intent, new or old, does not provide additional information about the application, but merely conveys the effective date of the rate increase, its amount and the like. There is simply no new application or substantively different application in

¹⁰ Commission Staff’s Recommendation on Sufficiency (Jan. 19, 2018).

¹¹ Commission Staff’s Supplemental Recommendation on Administrative Completeness and Suspension of Rates and Request for Referral to the State Office of Administrative Hearings (Mar. 22, 2018).

¹² Although Staff uses the word “insufficient,” TWC § 13.1871(e) refers to an application or statement of intent that is “not substantially complete or does not comply with the regulatory authority’s rules.” As a comparison, 16 TAC § 24.26(b) refers to a utility that “has failed to properly complete the rate application.”

¹³ Some of Staff’s questions literally sprung from poor copy quality on the receiving end of the electronically transmitted information and were not substantive issues at all.

¹⁴ Commission Staff’s Request for Additional Intervention Date at 2 (June 28, 2018).

¹⁵ See attached Exhibit A (Dec. 27, 2017 Statement of Intent) and Exhibit B (May 30, 2018 Statement of Intent).

this case, just good faith attempts by FGU to answer questions posed *by* Staff with no ultimate bearing on the rate requested.

Additionally, if the standard for notice and intervention changed every time a new ratepayer hooked on to the system as Staff suggests, an applicant would have the continuous and expensive obligation to send out public notices. Hearings (much less potential settlement of contested hearings) would never move to resolution. This process is counter to the Legislature's intent that the Commission and intervenors do not suspend, drag out, delay, or otherwise pause the implementation of any proposed rates beyond a maximum of 265 days regardless of circumstance.

If the Staff believes additional notice and intervention to ratepayers is necessitated every time an application is deemed insufficient or incomplete (by them), they should provide minimal due process to those utilities bearing the burden of that duplicative process by proposing these policy changes of statewide applicability through formal rulemaking in accordance with the Administrative Procedure Act. In the alternative, if the ALJ believes a new notice and opportunity for intervention is warranted, FGU requests that any new intervenor be aligned with the existing intervenors represented by one individual and accept the procedural schedule as it existed at the time of intervention in accordance with Commission procedural rules.¹⁶

IV. PRAYER

WHEREFORE, PREMISES CONSIDERED, Forest Glen Utility Company prays that the ALJ issue an Order denying Staff's Request for Additional Intervention Date or, if granted, require any new intervening party to be aligned with the existing intervenors and accept the procedural schedule as fixed in SOAH Order No. 2 without changes.

¹⁶ 16 TAC § 22.104(d)(3).

Respectfully submitted,

Randall B. Wilburn
State Bar No. 24033342
Helen S. Gilbert
State Bar No. 00786263
GILBERT WILBURN PLLC
7000 N. MoPac Expwy, Suite 200
Austin, Texas 78731
Telephone: (512) 494-5341
Telecopier: (512) 472-4014

By: Helen S. Gilbert
Helen S. Gilbert

**ATTORNEYS FOR FOREST GLEN
UTILITY COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that I have or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail, or Certified Mail Return Receipt Requested on all parties on the 6th of July 2018.

Helen S. Gilbert
Helen S. Gilbert

EXHIBIT A

AFFIDAVIT

STATE OF TEXAS

COUNTY OF Medina

I, Harry Hausman being duly sworn, file this **NOTICE OF
PROPOSED RATE CHANGE** as Manager

(indicate relationship to Utility, that is, owner, member of partnership, title as officer of corporation, or other authorized representative of Utility); that, in such capacity, I am qualified and authorized to file and verify such NOTICE; and that all statements made and matters set forth herein are true and correct.

I further represent that a copy of the attached NOTICE was provided
by

USPS
(method of delivery)

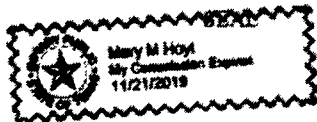
to each customer or other affected party on or about December 27, 20 17

[Signature]
AFFIANT
(Utility's Authorized Representative)

Forest Glen Utility Co.
NAME OF UTILITY

If the Affiant to this form is any person other than the sole owner, partner, officer of the Utility, or its attorney, a properly verified Power of Attorney must be enclosed.

SUBSCRIBED AND SWORN TO BEFORE ME,
this the 27th day of December, 20 17, to certify
which witness my hand and seal of office.



Mary M. Hoyt
NOTARY PUBLIC IN AND FOR THE
STATE OF TEXAS

Mary M. Hoyt
PRINT OR TYPE NAME OF NOTARY

MY COMMISSION EXPIRES 11/21/2019

EXHIBIT A

P.U.C. DOCKET NO. 47897 *

NOTICE OF PROPOSED RATE CHANGE
PURSUANT TO TEX. WATER CODE § 13.1871

2018 JAN 11 AM 10:12

PUBLIC UTILITY COMMISSION
FILING CLERK

FOREST GLEN UTILITY COMPANY

21070

Company Name

CCN Number(s)

has filed a rate change application with the Public Utility Commission of Texas (Commission or PUC). The application may be reviewed online at interchange.puc.texas.gov. You may also inspect a copy of the rate change application at your utility's office at the address below or at the Commission's office (1701 N. Congress Ave, Austin, TX 78701). The proposed rates will apply to service received after the effective date provided below, unless modified or suspended by the Commission. If the Commission receives a sufficient number of protests, separately or in a combined protest letter, from at least _____ [number of] ratepayers (10 percent of the utility's customers over whose rates the Commission has original jurisdiction) or from any affected municipality before the 91st day after the proposed effective date, the matter will be set for hearing. See Protest Form on the next page for instructions on how to protest.

EFFECTIVE DATE OF PROPOSED INCREASE: 2/1/2018

(must be at least 35 days after notice is provided to customers and 35 days after application is filed)

(Proposed rates requested by the utility are not final. The Commission may modify the rates and order a refund or credit against future bills all sums collected during the pendency of the rate proceeding in excess of the rate finally ordered plus interest.)

Reason(s) for proposed Rate Change:

TO ENSURE RATES COVER ACTUAL OPERATING COSTS OF THE UTILITY FGUS RATES HAVE BEEN BELOW THE COST OF SERVICE SINCE 2012

BILLING COMPARISON

Water

Existing	5,000 gallons:	\$ _____ /mo	Proposed	5,000 gallons:	\$ _____ /mo
Existing	10,000 gallons:	\$ _____ /mo	Proposed	10,000 gallons:	\$ _____ /mo
Existing	30,000 gallons:	\$ _____ /mo	Proposed	30,000 gallons:	\$ _____ /mo

Sewer

Existing	5,000 gallons:	\$ _____ \$5.00 /mo	Proposed	5,000 gallons:	\$ _____ \$5.00 /mo
Existing	10,000 gallons:	\$ _____ /mo	Proposed	10,000 gallons:	\$ _____ /mo

PROTRANCO RANCH

Subdivision(s) or System(s) Affected by Rate Change

Company Address City State Zip

Company Phone Number

214,000.00

8/8/2017

Annual Revenue Increase

Date Notice Delivered

8/1/2012

Not Applicable

Date of Last Rate Change

Date Meters Typically Read

* Prior to providing notice, the utility shall file a request for the assignment of a docket number for the application.

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EXHIBIT A

P.U.C. DOCKET NO. 47867

RATEPAYER PROTEST

If you wish to PROTEST the proposed rate change, you must submit this form and 10 copies to:

Filing Clerk
Public Utility Commission of Texas
1701 North Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

Unless protests are received from at least 10% of ratepayers or from any affected municipality, or the Commission Staff requests a hearing, no hearing will be held and the rates will be effective as proposed.

CUSTOMER INFORMATION (to be completed by customers submitting protests)

First Name: _____ Last Name: _____

Phone Number: _____ Fax Number: _____

Address, City, State: _____

Location where service is received: _____

(if different from the mailing address)

Please fill out the following:

I wish to PROTEST the following proposed rate action/s:

- ☐ Water Rate Change ☐ Sewer Rate Change ☐ Both Water and Sewer Rate Change
☐ Other (please specify below)

Signature of Protester: _____

Date: _____

Si desea informacion en Espanol, puede llamar al
1-888-782-8477

Hearing- and speech-impaired individuals with text telephones may contact the PUC's Customer Assistance
Hotline at
512-936-7136

EXHIBIT A

NOTICE OF PROPOSED RATE CHANGE -SEWER			
CURRENT RATES		PROPOSED RATES	
Monthly base rate including _____ gallons		Monthly base rate including _____ gallons	
Meter Size:		Meter Size:	
RESIDENTIAL		RESIDENTIAL	
5/8" or 3/4"	\$	5/8" or 3/4"	\$
1"	\$	1"	\$
1 1/2"	\$	1 1/2"	\$
2"	\$	2"	\$
3"	\$	3"	\$
Other:	\$	Other:	\$
GALLONAGE OR FIXED CHARGE:		GALLONAGE OR FIXED CHARGE:	
\$ 36.00		\$ 65.00	
<input checked="" type="checkbox"/> per month; OR		<input checked="" type="checkbox"/> per month; OR	
<input type="checkbox"/> for each additional 1,000 gallons over the minimum.		<input type="checkbox"/> for each additional 1,000 gallons over the minimum.	
Gallage charges are determined based on average consumption for winter period which includes the following months:		Gallage charges are determined based on average consumption for winter period which includes the following months:	
MISCELLANEOUS FEES		MISCELLANEOUS FEES	
Tap Fee	\$ 300.00	Tap Fee	\$ 300.00
Reconnect fee:		Reconnect fee:	
Non-payment		Non-payment	25.00
	\$ 25.00	(Maximum - \$25.00)	\$
Customer's Request	\$ 50.00	Customer's Request	\$ 50.00
Transfer Fee	\$ 50.00	Transfer Fee	\$ 50.00
Late Charge	\$ 5.00	Late charge: (Indicate either \$5.00 or 10%)	\$ 10%
Returned Check Charge	\$ 25.00	Returned Check Charge	\$ 25.00
Deposit		Deposit	
	\$ 50.00	(Maximum \$50.00)	\$ 50.00
Meter test fee	\$ Actual Cost	Meter test fee	\$ 25.00
		(Maximum - \$25.00)	

Regulatory Assessment of 1% is added to base rate and gallage charges. Additional fees and meter sizes may be shown on a separate page.

If applicable, list any bill payment assistance programs to low income Ratepayers.

FGU has maintained rates below the cost of service since 2012.

EXHIBIT B

AFFIDAVIT

STATE OF TEXAS

COUNTY OF Medina

I, Steven Greenberg being duly sworn, file this **NOTICE OF PROPOSED RATE CHANGE**

Chief Executive Officer

as

(indicate relationship to Utility, that is, owner, member of partnership, title as officer of corporation, or other authorized representative of Utility); that, in such capacity, I am qualified and authorized to file and verify such NOTICE; and that all statements made and matters set forth herein are true and correct. This new Statement of Intent (and effective date of rate) is being provided as the result of action taken by the Public Utility Commission of Texas at its 5/25/18 open meeting.

I further represent that a copy of the attached NOTICE was provided by

USPS

(method of delivery)

June 1 20 18

to each customer or other affected party on or about

Steven Greenberg

AFFIANT

(Utility's Authorized Representative)

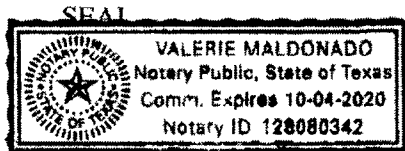
Forest Glen Utility Company

NAME OF UTILITY

If the Affiant to this form is any person other than the sole owner, partner, officer of the Utility, or its attorney, a properly verified Power of Attorney must be enclosed.

SUBSCRIBED AND SWORN TO BEFORE ME,

this the 30th day of May, 20 18, to certify which witness my hand and seal of office.



Valerie Maldonado
NOTARY PUBLIC IN AND FOR THE
STATE OF TEXAS

Valerie Maldonado

PRINT OR TYPE NAME OF NOTARY

MY COMMISSION EXPIRES

10/04/20

EXHIBIT B**P.U.C. DOCKET NO. 47897 *****NOTICE OF PROPOSED RATE CHANGE
PURSUANT TO TEX. WATER CODE § 13.1871****FOREST GLEN UTILITY COMPANY****21070**

Company Name

CCN Number(s)

has filed a rate change application with the Public Utility Commission of Texas (Commission or PUC). The application may be reviewed online at interchange.puc.texas.gov. You may also inspect a copy of the rate change application at your utility's office at the address below or at the Commission's office (1701 N. Congress Ave, Austin, TX 78701). The proposed rates will apply to service received after the effective date provided below, unless modified or suspended by the Commission. If the Commission receives a sufficient number of protests, separately or in a combined protest letter, from at least 22 [number of] ratepayers (10 percent of the utility's customers over whose rates the Commission has original jurisdiction) or from any affected municipality before the 91st day after the proposed effective date, the matter will be set for hearing. See Protest Form on the next page for instructions on how to protest.

EFFECTIVE DATE OF PROPOSED INCREASE: 7/6/2018

(must be at least 35 days after notice is provided to customers and 35 days after application is filed)

(Proposed rates requested by the utility are not final. The Commission may modify the rates and order a refund or credit against future bills all sums collected during the pendency of the rate proceeding in excess of the rate finally ordered plus interest.)

Reason(s) for proposed Rate Change:

TO ENSURE RATES COVER ACTUAL OPERATING COSTS OF THE UTILITY. FGL'S RATES HAVE BEEN BELOW THE COST OF SERVICE SINCE 2012.

BILLING COMPARISON**Water**

Existing	5,000 gallons:	\$ _____ /mo	Proposed	5,000 gallons:	\$ _____ /mo
Existing	10,000 gallons:	\$ _____ /mo	Proposed	10,000 gallons:	\$ _____ /mo
Existing	30,000 gallons:	\$ _____ /mo	Proposed	30,000 gallons:	\$ _____ /mo

Sewer

Existing	5,000 gallons:	\$ _____ 35.00 /mo	Proposed	5,000 gallons:	\$ _____ 65.00 /mo
Existing	10,000 gallons:	\$ _____ /mo	Proposed	10,000 gallons:	\$ _____ /mo

PROTRANCO RANCH**Subdivision(s) or System(s) Affected by Rate Change**

15720 Bandera #103	Helotes	Tx	78023
Company Address	City	State	Zip

(210) 695-5490

Company Phone Number

214,000.00**6/1/2018**

Annual Revenue Increase

Date Notice Delivered

8/1/2012**Not Applicable**

Date of Last Rate Change

Date Meters Typically Read

* Prior to providing notice, the utility shall file a request for the assignment of a docket number for the application.

EXHIBIT B

P.U.C. DOCKET NO. 47897

RATEPAYER PROTEST

If you wish to PROTEST the proposed rate change, you must submit this form and 10 copies to:

**Filing Clerk
Public Utility Commission of Texas
1701 North Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326**

Unless protests are received from at least 10% of ratepayers or from any affected municipality, or the Commission Staff requests a hearing, no hearing will be held and the rates will be effective as proposed.

CUSTOMER INFORMATION (to be completed by customers submitting protests)

First Name: _____ Last Name: _____

Phone Number: _____ Fax Number: _____

Address, City, State: _____

Location where service is received: _____

(if different from the mailing address)

Please fill out the following:

I wish to PROTEST the following proposed rate action/s:

☐ Water Rate Change ☐ Sewer Rate Change ☐ Both Water and Sewer Rate Change

☐ Other (please specify below)

Signature of Protester:

Date:

**Si desea informacion en Espanol, puede llamar al
1-888-782-8477**

**Hearing- and speech-impaired individuals with text telephones may contact the PUC's Customer Assistance
Hotline at
512-936-7136**

EXHIBIT B

NOTICE OF PROPOSED RATE CHANGE –SEWER

CURRENT RATES		PROPOSED RATES	
Monthly base rate including _____ gallons		Monthly base rate including _____ gallons	
Meter Size:		Meter Size:	
RESIDENTIAL		RESIDENTIAL	
5/8" or 3/4" \$ _____		5/8" or 3/4" \$ _____	
1" \$ _____		1" \$ _____	
1 1/2" \$ _____		1 1/2" \$ _____	
2" \$ _____		2" \$ _____	
3" \$ _____		3" \$ _____	
Other: \$ _____		Other: \$ _____	
GALLONAGE OR FIXED CHARGE:		GALLONAGE OR FIXED CHARGE:	
\$ _____ 35.00		\$ _____ 65.00	
<input checked="" type="checkbox"/> per month; OR		<input checked="" type="checkbox"/> per month; OR	
<input type="checkbox"/> for each additional 1,000 gallons over the minimum.		<input type="checkbox"/> for each additional 1,000 gallons over the minimum.	
Gallage charges are determined based on average consumption for winter period which includes the following months:		Gallage charges are determined based on average consumption for winter period which includes the following months:	
MISCELLANEOUS FEES		MISCELLANEOUS FEES	
Tap Fee \$ _____ 300.00		Tap Fee \$ _____ 300.00	
Reconnect fee: Non-payment \$ _____ 25.00		Reconnect fee: Non-payment \$ _____ 25.00 (Maximum - \$25.00)	
Customer's Request \$ _____ 50.00		Customer's Request \$ _____ 50.00	
Transfer Fee \$ _____ 50.00		Transfer Fee \$ _____ 50.00	
Late Charge \$ _____ 5.00		Late charge: (Indicate either \$5.00 or 10%) \$ _____ 10%	
Returned Check Charge \$ _____ 25.00		Returned Check Charge \$ _____ 25.00	
Deposit \$ _____ 50.00		Deposit (Maximum \$50.00) \$ _____ 50.00	
Meter test fee \$ _____ Actual Cost		Meter test fee \$ _____ 25.00 (Maximum - \$25.00)	

Regulatory Assessment of 1% is added to base rate and gallonage charges. Additional fees and meter sizes may be shown on a separate page.

If applicable, list any bill payment assistance programs to low income Ratepayers.

FGU has maintained rates below the cost of service since 2012.