

How The Consumption Volume Complaint Was Discovered

The discovery of the complaint issues developed in late 2022. After its rate case was complete, Aqua filed its tariff schedule for the approved rate increases on May 23, 2022. Unknown to me at the time was the fact that Aqua made a clerical error in its rates for New Garden customers. They showed the consumption charge for the 0 – 5,000 gallon rate band as zero cost – that consumption was included in the quarterly fixed cost. (PDF page 29 of this filing: [LINK](#))

Nearly a month later on June 15, 2022 Aqua filed an amendment that changed the consumption charge for that rate band to \$23.259 per thousand gallons. (PDF page 5 of this filing: [LINK](#)) But, I was not aware of the change at that time.

The rate increase went into effect at the very end of a billing period. Therefore, the first bills we received only two days out of 91 were at the higher rate. The increase was invisible. The next bill in September had the full effect of the rate increase. Then, people were shocked. I fielded a number of phone calls from nearby residents and something was very wrong. Their bills were not consistent with the May 19, 2022 tariff filing. They were much higher. Eventually I found out about Aqua's revised filing and our bills were indeed consistent with the revised filing.

However, that revised tariff filing had an interesting statement: "*Page 10.11 should be labeled as Base with no allowance, Excess 1 should be labeled as 0 to 15,000 gallons consistent with the rate and block structure from Exhibit 5-B Compliance, pages 6, 12 and 87 through 89*". That "*consistent with the rate and block structure ...*" caught my eye and I started investigating. I found Aqua's data to be very opaque (it can be found on PDF pages 14 – 19 of this [LINK](#)). I spent considerable time and effort to transform that data into something that made sense and reflected exactly what Aqua had filed. That turned out to be the three billing numbers and twelve volume numbers in the following data table on the next page:

Table #1 - Aqua's Consumption Volumes

	# Bills	Annual Gallons
Residential		
Monthly Fixed	22,992	
0 - 1667		9,580,000
1667 - 5,000		17,826,100
Over 5,000		58,758,600
Totals	22,992	86,164,700
Commerical #1		
Monthly Fixed	2,052	
0 - 1667		855,000
1667 - 5,000		13,149,400
Over 5,000		0
Totals	2,052	14,004,400
Commerical #2		
Monthly Fixed	332	
0 - 1667		95,000
1667 - 5,000		1,977,000
Over 5,000		1,752,400
Totals	332	3,824,400
Grand Total	25,376	103,993,500

From the above table all the major issues itemized in the complaint evolved. It took a lot of time to pull all the pieces together, but by June 2023 I was ready to file my complaint. grow as we organize more information and when new developments occur.