

Rockvale Corporation

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ORIGINAL

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

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CHIEF CLERK'S OFFICE

December 29, 2014

Illinois Commerce Commission
Commission's Chief Clerk
527 East Capital Avenue
Springfield, IL 62701

RE: Implementation Plan for 83 Illinois Administrative Code 280 for Rockvale Corporation

Attached is the Implementation Plan for Rockvale Corporation for Title 83 Illinois Administrative Code 280.15.

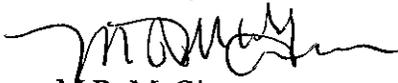
In summary, Rockvale plans to have a functional website operating by January 31, 2015 with initial application information available. A Customer Information Packet per the Code requirements will be completed by March 31, 2015 and submitted for review to the Commission.

Also attached is the Petition for Exemptions to Administrative Code 280 on behalf of Rockvale Corporation. The exemptions are being requested due to the size of the utility and the extremely limited resources available.

I will be forwarding a copy of these documents via US Mail to the Chief Clerk's office.

If you should have any questions or comments, I can be reached at 815-732-7876 or at mcginn@essex1.com.

Yours truly,



M.R. McGinn
President, Rockvale Corporation

TITLE 83: PUBLIC UTILITIES
CHAPTER I: ILLINOIS COMMERCE COMMISSION
SUBCHAPTER b: PROVISIONS APPLICABLE TO MORE THAN ONE KIND OF UTILITY
PART 280 PROCEDURES FOR GAS, ELECTRIC, WATER AND SANITARY SEWER UTILITIES GOVERNING ELIGIBILITY FOR SERVICE, DEPOSITS, BILLING, PAYMENTS, REFUNDS AND DISCONNECTION OF SERVICE
IMPLEMENTATION PLAN FOR ROCKVALE CORPORATION

SUBPART A: GENERAL

- Section 280.5 Policy
- Section 280.10 Exemptions – Filing Petition for Exemption December 29, 2014. Copy attached.
- Section 280.15 Compliance
- Section 280.20 Definitions

SUBPART B: APPLICATIONS FOR UTILITY SERVICE

- Section 280.30 Application – Electronic copy of Application for Service will be posted on the Rockvale website once the website is functional which is projected to be 1/31/15. A brief overview of the application process will also be posted.
- Section 280.35 Revert to Landlord / Property Manager Agreements – Will establish a prearrangement form with the one landlord/property manager with services from Rockvale. Will be completed by 3/31/15.

SUBPART C: DEPOSITS

- Section 280.40 Deposits – Request Exemption as Rockvale does not require/use customer deposits due to administrative burden and customer based demographics. Utility does not have resources to complete credit scoring for applicants.
- Section 280.45 Deposits for Low Income Customers – Request Exemption as Rockvale does not request income detail or credit scoring in the application process nor does it use customer deposits. Utility does not have resources to complete credit scoring for applicants.

SUBPART D: REGULAR BILLING

- Section 280.5 Billing – Minor revisions will be required to the existing billing statement. An example of the billing statement will be posted to the website by 3/31/15. Requesting exemption from section (d), part (3) Delivery by Electronic Means; Rockvale does not have the resources to comply. Bills are manually hand calculated statements delivered by US

Mail.

SUBPART E: PAYMENT

- Section 280.60 Payment – Summary of acceptable forms of payment and late payments will be incorporated into Customer Information Packet by 3/31/15. Request exemption from section (d) as Rockvale does not charge late fees due to administrative burden.
- Section 280.65 Late Payment Fee Waiver for Low Income Customers – Request Exemptions as Rockvale does not request income detail or credit scoring in the application process nor does it use Late Payment Fees.
- Section 280.70 Preferred Payment Date – Request Exemption due to limited administrative resources & no history that such a plan is required by customer base.
- Section 280.80 Budget Payment Plan – Request Exemption due to due to limited administrative resources & no request of such plan by customer base..

SUBPART F: IRREGULAR BILLING

- Section 280.90 Estimated Bills – Summary of estimated bills policy will be incorporated into Customer Information Packet by 3/31/15.
- Section 280.100 Previously Unbill Service – Request Exemption due to customer base is residential only; service is established when new homeowner purchases property.

SUBPART G: REFUNDS AND CREDITS

- Section 280.110 Refunds and Credits – Summary of refund policy will be incorporated into Customer Information Packet by 3/31/15.

SUBPART H: PAYMENT ARRANGEMENTS

- Section 280.120 Deferred Payment Arrangement - Request exemption as historically, Rockvale has not required such arrangements with customer base. Only one customer has required a payment plan periodically and we have handled in a written, but more informal basis. Formalized DPA would result in an undue burden of administrative support.
- Section 280.125 Deferred Payment Arrangement for Low Income Customers – Request Exemption as Rockvale does not request income detail or credit scoring in the application process.

SUBPART I: DISCONNECTION

- Section 280.130 Disconnection of Service – Summary of Disconnection of Services will be incorporated into Customer Information Packet by 3/31/15
- Section 280.135 Winter Disconnection of Residential Heating Services – Request Exemption – not applicable to a water utility.
- Section 280.140 Disconnection for Lack of Access to Mutli-Meter Premises – Request Exemption as no such premises exist; customer base is residential, single family.
- Section 280.150 Disconnection for Master-Metered Apartment Buildings – Request

Exemption as no such premises exist; customer base is residential, single family.

SUBPART J: MEDICAL CERTIFICATION

- Section 280.160 Medical Certification – Summary of Medical Certification requirements will be incorporated in the Customer Information Packet by 3/31/15.

SUBPART K: RECONNECTION

- Section 280.170 Timely Reconnection of Services – Summary of Reconnection of Services will be incorporated into the Customer Information Packet by 3/31/15.
- Section 280.180 Reconnection of Former Residential Customers for the Heating Season – Request Exemption – not applicable to a water utility

SUBPART L: UNAUTHORIZED SERVICE USAGE

- Section 280.190 Treatment of Illegal Taps – Summary of Treatment of Illegal Taps will be incorporated into the Customer Information Packet by 3/31/15.
- Section 280.200 Tampering – Summary of Tampering will be incorporated into Customer Information Packet by 3/31/15.
- Section 280.205 Non-Residential Tampering – Request Exemption – not applicable to customer base; residential only
- Section 280.210 Payment Avoidance by Location – Request Exemption – not applicable to utility of our size (~125 residential customers in 3 single family subdivisions)

SUBPART M: COMPLAINT PROCEDURES

- Section 280.220 Utility Complaint Process – Reference to the Administrative Code section will be incorporated into Customer Information Packet by 3/31/15.
- Section 280.230 Commission Complaint Process - Reference to the Administrative Code section will be incorporated into Customer Information Packet by 3/31/15.

SUBPART N: INFORMATION

- Section 280.240 Public Notice of Commission Rules – Notice will be added to utility website by 3/31/15. A written supplemental notice will be attached to customer's June 2015* billing statements. See section 280.260 comments below.
- Section 280.250 Second Language Requirements – Request Exemption as not required by customer base demographics.
- Section 280.260 Customer Information Packet – Customer Information Packet will be created in compliance with section's requirement by 3/31/15. Written copy will be provided to new customers beginning May 15 2015*. A written supplemental notice will be attached to customer's June 2015* billing of the availability of document on utility website or by request. **Delay in notification and distribution is to allow for 45 day period per Section 280.260(d) for review by Manager of Consumer Services Division.*
- Section 280.APPENDIX A Disconnection Notice – Existing notice will be reviewed and

any required updates completed by 3/31/15. Sample notice will be submitted to ICC by 3/31/15.

- Section 280.APPENDIX B Customer Rights - Existing notice will be reviewed and any required updates completed by 3/31/15. Sample notice will be submitted to ICC by 3/31/15.
- Section 280.APPENDIX C Public Notice – See section 280.240 and 280.260 comments above.
- Section 280.APPENDIX D Disconnection Notice Insert for Residential Gas and Electric Customers – Request Exemption – not applicable to a water utility