

Rockvale Corporation

P.O. Box 401
Oregon, Illinois 61061
815-732-7876
water@rockvalecorp.com

CHIEF CLERK'S OFFICE

2015 JAN 12 PM 1:11

ILLINOIS COMMERCE
COMMISSION

January 8, 2015

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

CP 280

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

Rockvale is a small, family owned public utility providing water service to approximately 125 customers and sewer services to 4 customers located in rural, northern Illinois. The utility was organized by Martin McGinn in April 1974, amended March 1981. After Martin's death in 2003 the utility was run by his wife, Janet McGinn, until her death in April 2012. Since that time, I have been running the utility. There are no employees of the firm, only part time contractors. No compensation is paid to any family member. The utility has extremely limited financial and personnel resources.

Rockvale understands the importance of compliance with regulatory requirements and the necessity of fair and unbiased service to customers. Rockvale has a history of NO customer complaints to the ICC. The utility has consistently maintained compliance with all ICC and Illinois EPA requirements over the years.

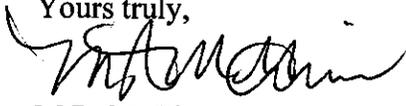
Due to the number and demographics of the customers, client servicing is very manual and often customized to meet the individual customer's needs and personal situation. Based upon discussion with staff members of the Commission, Rockvale's current 'policies and procedures' are actually more often preferential to the customer than the rules require.

Attached is a revised Implementation Plan for Rockvale Corporation for Title 83 Illinois Administrative Code 280.15. Revisions have been made after consultation with Commission staff which has led to a better understanding of regulations.

In summary, Rockvale feels that we can achieve full compliance to the Code through our normal, manual interactions with our customers by May 1, 2016. Short term plans include Rockvale to have a functional website operating by February 28, 2015 with initial customer application information available. A Customer Information Packet per the Code requirements will be completed by April 30, 2015 and submitted for review to the Commission. Additional details are documented in the attached Plan.

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

Yours truly,

A handwritten signature in black ink, appearing to read 'M.R. McGinn', written in a cursive style.

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 (01/08/2015)

SUBPART A: GENERAL

- Section 280.5 Policy
- Section 280.10 Exemptions
- 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 2/28/15. A brief overview of the application process will also be posted.
- Section 280.35 Revert to Landlord / Property Manager Agreements – Rockvale has only one landlord/property manager. Historically, if rental has not been occupied, bill has been sent to him and he remits payment. No formal agreement is warranted at this time. If the situation changes in the future such agreement would be put in place.

SUBPART C: DEPOSITS

- Section 280.40 Deposits –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. If the situation evolved that warranted a customer to provide a deposit, a policy would be created and put in place.
- Section 280.45 Deposits for Low Income Customers –Rockvale does not require/use customer deposits. In the future, Rockvale will achieve manual compliance through consideration of individual circumstances.

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 4/30/15. Bills are manually hand calculated statements delivered by US Mail. In the future, if a customer

requested an electronic billing, hand calculated bill would be manually scanned and emailed to meet compliance.

SUBPART E: PAYMENT

- Section 280.60 Payment – Summary of acceptable forms of payment and late payments will be incorporated into Customer Information Packet by 4/30/15. Rockvale does not charge late fees due to administrative burden.
- Section 280.65 Late Payment Fee Waiver for Low Income Customers – Not applicable as Rockvale does not charge Late Payment Fees.
- Section 280.70 Preferred Payment Date – Rockvale has no history that such a plan is required by customer base. If requested in the future, Rockvale will achieve manual compliance through consideration of individual circumstances.
- Section 280.80 Budget Payment Plan – Rockvale has no history that such a plan is required by customer base. If requested in the future, Rockvale will achieve manual compliance through consideration of individual circumstances.

SUBPART F: IRREGULAR BILLING

- Section 280.90 Estimated Bills – Summary of estimated bills policy will be incorporated into Customer Information Packet by 4/30/15. Rockvale has for last several years used estimates every other month in an effort to reduce costs of meter reading services. Customers have the option to provide own reading every month in lieu of the estimate.
- Section 280.100 Previously Unbill Service – Not applicable as customer base is single family 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 4/30/15.

SUBPART H: PAYMENT ARRANGEMENTS

- Section 280.120 Deferred Payment Arrangement - 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. If requested in the future, Rockvale will achieve manual compliance through consideration of individual circumstances.
- Section 280.125 Deferred Payment Arrangement for Low Income Customers – If requested in the future, Rockvale will achieve manual compliance through consideration of individual circumstances.

SUBPART I: DISCONNECTION

- Section 280.130 Disconnection of Service – Summary of Disconnection of Services will be incorporated into Customer Information Packet by 4/30/15. Current policy is more lenient than Commission rules.

- Section 280.135 Winter Disconnection of Residential Heating Services – Not applicable to a water utility.
- Section 280.140 Disconnection for Lack of Access to Mutli-Meter Premises – Not Applicable as no such premises exist; customer base is single family residential.
- Section 280.150 Disconnection for Master-Metered Apartment Buildings –Not Applicable as no such premises exist; customer base is single family residential.

SUBPART J: MEDICAL CERTIFICATION

- Section 280.160 Medical Certification – Summary of Medical Certification requirements will be incorporated in the Customer Information Packet by 4/30/15.

SUBPART K: RECONNECTION

- Section 280.170 Timely Reconnection of Services – Summary of Reconnection of Services will be incorporated into the Customer Information Packet by 4/30/15.
- Section 280.180 Reconnection of Former Residential Customers for the Heating Season – 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 4/30/15.
- Section 280.200 Tampering – Summary of Tampering will be incorporated into Customer Information Packet by 4/30/15.
- Section 280.205 Non-Residential Tampering –Not Applicable to as customer base is single family residential only.
- Section 280.210 Payment Avoidance by Location – 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 4/30/15.
- Section 280.230 Commission Complaint Process - Reference to the Administrative Code section will be incorporated into Customer Information Packet by 4/30/15.

SUBPART N: INFORMATION

- Section 280.240 Public Notice of Commission Rules – Notice will be added to utility website by 5/31/15. 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 –Not required by existing customer base demographics. If a change in demographics in the future, Rockvale will demonstrate compliance by 5/1/16.
- Section 280.260 Customer Information Packet – Customer Information Packet will be

created in compliance with section's requirement by 4/30/15. Written copy will be provided to new customers beginning July 2015*. A written supplemental notice will be attached to customer's August 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 4/30/15. Sample notice will be submitted to ICC by 4/30/15. Rockvale current timeline for warning and disconnection is more lenient than Commission rules.
- Section 280.APPENDIX B Customer Rights - Existing notice will be reviewed and any required updates completed by 4/30/15. Sample notice will be submitted to ICC by 4/30/15.
- 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 – Not Applicable to a water utility