PSC REF#:230968

DIRECT CUSTOMER CHARGE

FOR

PUBLIC FIRE PROTECTION

Docket 05-WI-100

Testimony of John A. Mayer

November 1988

DIRECT TESTIMONY OF JOHN A. MAYER

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2 Would you please state your name and business address? 3 Q. Α. My name is John A. Mayer. My business address is 10624 4 5 North Port Washington Road, Mequon, Wisconsin, 53092. 6 By whom are you employed and in what capacity? 7 Q. I am president of the consulting firm known as John A. 8 Α. 9 Mayer Associates, Utility Rate Consultants. The firm is 10 an independent professional cost engineering firm which 11 provides services to municipal utilities, investor-owned 12 utilities, regulatory commissions and utility users in the areas of cost of service, utility rate design, and related د ــ 14 matters. 15 Have you prepared a summary of your educational background 16 Q.

and business experience?

A. Yes I have. A copy of my professional qualifications is contained as Attachment 1 of this testimony.

What is the purpose of your testimony in these hearings? 21 Q. The purpose of my testimony today is to propose two (2) 22 Α. alternative methods of direct charging Public Fire 23 Protection costs (PFP) to general water service customers. 24 Both alternatives would be administratively feasible. 25 The first alternative would be the most precise since it would 26 base the charge to an individual customer on actual fire 27

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flow demand potential. The second alternative would be the most practical since it eliminates the need to estimate the fire flow demand for a municipality which can be the single most influential decision affecting the allocation of costs to customer class.

Q. Is your proposal being sponsored by any municipality,
company or other third party?

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A. No it is not. I am sponsoring this proposal myself because I am involved in the water cost-of-service and rate design studies on a daily basis both in Wisconsin and in other states and consequently this affects my work.

Secondly, I feel strongly that another method or methods of direct charging for PFP, other than that of equivalent services, can result in a more equitable distribution of the costs associated with PFP.

Thirdly, I feel that this presents a unique opportunity to address another problem and source of confusion and misunderstanding I have encountered in the development of the revenue requirement for my municipal clients, namely the "tax equivalent" payment.

Q. Mr. Mayer, what exactly makes up these "costs" which
utility rate experts classify as fire protection costs?
A. When a water system is constructed, water mains, elevated
storage tanks, and pumps are sized to permit flows capable
of handling the water needs of the general water service

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customers, as well as to provide adequate fire flows. In all but the larger cities, the requirement for fire flow capability results in the construction of a larger capacity system than that required to meet daily domestic and process uses alone. There is, therefore, an identifiable "cost" associated with the existence of this fire flow capability.

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The cost of service study allocates a portion of the operating and maintenance expense, depreciation, and other charges associated with this fire flow capacity to the category of "Fire Protection". This cost, along with the cost of maintaining hydrants and associated hardware, is the basis for the fire protection charge.

Historically, this fire protection "cost" has become a part of the utility's approved rate tariffs and has been billed to the municipality. The municipality would then pay for this service with funds collected through the property tax. Thus the charge for this additional capacity built into the water system for fire protection service would be collected through the property tax rather than through the sale of water, because it was felt that fire protection benefits each property in proportion to the relative value of the property and not in proportion to the amount of the water used. The person with the more expensive property derives more "benefit" from fire protection than a person with a less valuable home. It happens that a convenient measure of a property's "value"

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is the assessed value, so therefore the property tax became the vehicle to collect for fire protection.

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4 Q. Is this the only method authorized by the Wisconsin Public 5 Service Commission (PSC) to collect for PFP charges? Recent legislation passed by the Wisconsin 6 Α. No. 7 Legislature has provided an alternative for the traditional method for collecting for PFP services. 8 The 9 utility can now recover these costs by direct billing their customers based on an equivalent number of 3/4" 10 11 The direct charging of PFP costs can be a more services. 12 appropriate method than the property tax method 13 particularly for a utility which serves a large percentage of tax exempt customers. 14

- Q. Mr. Mayer, would you please describe the first of the two
 alternative methods you are proposing to direct charge for
 PFP costs?
- I will refer to this alternative as the "Actual Fire 19 A. Yes. Demand" method. What we are trying to accomplish is the 20 21 recovery of the costs associated with public fire 22 protection in the most equitable and straightforward manner possible. The historic method based on property 23 24 value certainly has some significant merit. There also 25 can be inequities as there will be with any methodology. The very expensive high-rise office building designed to 26 contain the spread of a fire and constructed with fire-27

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resistant materials would likely pay a disproportionate percentage of the fire protection charge vis-a-vis a low assessed value lumber yard with an extremely high fire flow requirement.

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Ideally one would like to assign PFP in proportion to the each individual customer's actual fire demand. Practically this is impossible on a per customer basis. A reasonable compromise, however, would be to create a halfdozen or so fire flow categories with each category or group covering a "range" of fire flow requirements. In this manner the cost of PFP would be assigned to customers based on fire flow requirements, and the utility's billing systems could easily accommodate this since every customers would essentially be receiving a "private fire protection" charge.

- 17 Q. How would you propose to determine an individual18 customer's fire flow?
- The Insurance Services Office or ISO is an organization Α. 19 which performs a number of services relative to 20 21 determining and grading commercial buildings and entire municipalities as to their ability to protect property 22 The ISO has published a document against fire damage. 23 titled "Fire Suppression Rating Schedule" (Edition 6-80) 24 25 the stated purpose of which is "to review the available public fire suppression facilities, and to develop a 26 Public Protection Classification for fire insurance rating 27

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purposes".

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The formulas and analysis delineated in this document are extensive, and consider numerous factors such as what activities or purpose the building is used for called the "occupancy factor", (i.e. low hazard gymnasium vs. high hazard chemical storage); distance to neighboring structures; and the potential for the fire to spread to the neighboring structure through windows vs. a solid wall, etc. Consideration of all of these elements would be impractical for rate setting purposes.

- 12 Q. If you did not use the ISO formulas directly, what did you13 use to determine the fire flow?
- 14 Α. I limited the formulas to a single formula used by the ISO 15 to determine the needed fire flow based solely on the size of the structure and the construction materials, but 16 before applying factors to adjust for the "use" or 17 18 occupancy factor, proximity to other buildings, and risks of the fire spreading to other structures. Since the 19 purpose of this method is to allocate the cost of fire 20 protection, consideration of the fire hazard of the 21 22 building alone was a logical decision.
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- Q. Mr. Mayer, how did you determine or establish the "ranges"
 you mentioned earlier?
- A. In order to show this proposal more clearly, I have
 prepared Schedule 1 of Exhibit _____ (JAM-1) which

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indicates six (6) PFP categories numbered from 1 to 6 in the upper left box. The number and ranges were selected somewhat arbitrarily, but the intent is to establish ranges in multiples of "typical residential" required flows. All single-family residential and two-family duplex dwellings not exceeding 2-stories in height or 3000 sq. ft. in area are to be considered "residential" and assigned to PFP Category #1. All other structures would be subject to the PFP category as determined in this exhibit.

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This exhibit shows the fire flow required and PFP category under four (4) separate construction categories, given an effective square foot area. The effective square foot area includes all stories, but excludes the basement. For fire-resistive buildings only the largest successive six floor areas are considered. If the vertical openings are protected, only the 3 largest successive floor should be considered.

How would customers be assigned to a PFP category? 20 Q. Residential customers would automatically be assigned a 21 Α. PFP-1 rating. A form would need to be sent to all non-22 residential customers asking the customer to supply the 23 effective square footage (total floor area excluding 24 basements), and a check-off box for construction material 25 (wood frame, concrete block, etc.). Using this 26 27 information and the computations contained on Schedule 1,

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the proper PFP category would be assigned to that customer.

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4 Q. How would the monthly or quarterly charge for each of
5 these PFP Categories be established?

A. The cost-of-service study would be performed in the typical manner in order to determine the "cost" associated with providing adequate fire flow capacity. This allocated PFP cost would be divided by the total number of equivalent residential PFP's receiving service. It is intended that this charge would be converted to a monthly or quarterly amount and would be collected as a separate line item on the customer's bill.

The cost increase on a residential customer's water bill could be very significant under this method, particularly for the smaller utilities, consequently limits on the overall percentage of PFP costs which could be collected through the PFP might need to be considered.

Why would that be more likely for the smaller utilities? 20 Q. A fire, whether it occurs in a large metropolitan area or 21 Α. 22 in a smaller town, causes the same requirements for water 23 to be put on a small utility as it does for a large utility. However, this instantaneous fire demand is a 24 much larger percentage of a small utility's overall 25 maximum demands than it is for a large utility. 26 27 A smaller utility does not benefit from the

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geographic diversity available to a large metropolitan area and, consequently, a much larger percentage of its total plant is devoted to serving these extra capacity costs. In general, the percentage of a cost of service allocation study assigned to fire protection is inversely proportional to the size of that water utility.

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Q. Mr. Mayer, could you briefly explain your second alternative method of direct charging for PFP?
A. My second alternative method is what I call the "Class Absorption" method. The cost-of-service allocation study is carried out in the typical manner with one exception, the allocation to customer class does not consider "fire protection" as a customer class. One of the major difficulties in the performance of any cost study is the determination of the municipality's fire flow demand.

Frequently used methods to estimate these fire flows are typically based on the population of the utility's service area and do not take into consideration the existence of the lumber yard or chemical plant in the computations. Consequently one frequently needs to adjust the "computed" population based fire flow to compensate for certain extraordinary situations if a true fire flow demand is to be developed.

By eliminating the category of fire protection, the need to make a subjective decision of a municipality's fire flow demand is eliminated. The fewer subjective

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decisions required in any cost study the better. While not as "precise" as the "Actual Fire Flow" method, it is simpler to administer than to try to determine each customer's PFP category and there is a great advantage to simplicity.

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7 Q. What actually happens to those fire protection costs if one eliminates "fire protection" as a class? 8 The functional costs of base, extra capacity-maximum day, 9 Α. 10 and extra capacity-maximum hour which would have been assigned to fire protection are "absorbed" by all customer 11 classes in proportion to each classes' average demand and 12 extra capacity demands. Residential customers typically 13 will be allocated a significant portion due to their high 14 peaking factors on a maximum daily and maximum hourly 15 basis. 16

Cost directly related to fire hydrants would still be identified separately and would be collected on a either a per connection or equivalent service basis. Costs associated with average and excess demands would be "absorbed" and not directly identified in the cost study.

Q. Under either the "Actual Fire Demand" or "Class
Absorption" method, how would the burden of the cost of
PFP be spread to customer classes?
A. Due to lack of specific information, a cost allocation
using the "Actual Fire Demand" method was not possible,

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however for comparison purposes it should be similar to the equivalent services method results for this community.

The effect under the "Class Absorption" method is materially different than the allocation based on equivalent services insofar as it significantly reduces the effect on residential customers by allocating the cost of PFP more evenly to all customer classes.

Schedule 2 of Exhibit ______(JAM-1) shows a comparison of the results under the existing method where PFP is paid by the municipality, under the current "equivalent services" method, and under the "Class Absorption" method for an actual municipal client of mine. While the equivalent services method would require increases of 43% for Residential, 17% for Commercial, 2% for Industrial, and 18% for Public Authority customers, the "Class Absorption" increase would be 26%, 27%, 23%, and 25% respectively.

While all customers classes would share in the cost of PFP, in every test I have made of either the equivalent services or "Actual Fire Demand" cost study alternatives, the bill for the average residential class would increase significantly since the PFP portion is being paid for as a fixed monthly or quarterly charge, and therefore the percentage increase will be far greater on a small user vs. a large user.

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Is there any way you can recommend to lessen the effect of

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the cost of PFP to the residential class?

A. I feel that there is a way. This leads to the third purpose my testimony. The direct charging for PFP will result in a tremendous cost savings to the municipality since it no longer will need to pay the "Fire Protection Charge" to the utility. For the municipality used in my example, it would be the difference between <u>paying</u> a net of \$38,406 vs. receiving income of \$82,147. This "windfall" cost savings will be at the expense of a significant increase in all customer's water bills.

An excellent way to mitigate the effect to residential customers would be if the Commission eliminates an element in the revenue requirement known as the "tax equivalent" payment or "payment in lieu of tax". This is frequently called PILOT by utility rate analysts.

Could you please explain what kind of "cost" is a PILOT? 17 Q. 18 Α. Certainly. PILOT is not a cost of providing water service. Chapter PSC 109 of the Wisconsin Administrative 19 Code indicates that this charge has been in effect since 20 21 at least 8-1-56. It is based on the "gross book value" of 22 water utility plant, excluding plant outside the municipal limits, times the assessment ratio, times the local and 23 school tax rates. Curiously this "tax equivalent" is not 24 permitted to be charged to Sewer Utilities nor to Sanitary 25 26 Districts.

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Q. Can you explain to us the rationale behind the charging
 for a "tax equivalent"?

A. I will try. There are two rationalizations generally
used to justify a PILOT. The first is that it is needed
to pay for services provided by the municipality which
are not billed to the utility. Use of city vehicles,
administrative personnel activities connected with the
utility, city attorney's time on utility matters, etc. are
frequently used as examples of unbilled costs.

The second rationalization is that PILOT should be paid because that is the tax which would be paid if the utility would be investor-owned, so it is sort of an "opportunity cost" of municipal ownership.

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Neither of these two rationalizations hold much value in my opinion. If there are services provided the utility which are not billed, then the municipality should bill for them. Don't mask a legitimate cost behind an obscure charge. Municipal ownership is <u>supposed to provide a cost</u> <u>advantage</u> to the customer. If one adds a charge in order to make the level of required revenue equal to that under private ownership, why have municipal ownership in the first place.

The point being that PILOT is not a real cost of providing water service. I will hypothesize that it came into existence because it offset, in whole or in part, the charge to the municipality for Public Fire Protection. If we direct charge for PFP, we should also eliminate the

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"tax equivalent" or PILOT requirement from the revenue requirement.

Q. Does the dollar amount paid under a PILOT bear any relationship to the value of service received?
A. In my opinion no.

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- 8 Q. Can you comment how PILOT is handled in other parts of the9 Country?
- A. Yes. In utility practice elsewhere in the Country, PILOT
 is occasionally found. It is most frequently calculated
 using depreciated plant investment, not gross plant as is
 done in Wisconsin. It also frequently considers only the
 <u>above ground</u> utility plant since that is the only plant
 which could in any way benefit from municipal services.

16 Generally speaking, the existence of a PILOT is most 17 common in situations where the utility charges the municipality for Public Fire Protection. If the utility 18 does not charge the municipality a "Public Fire 19 20 Protection" charge, then it is rare that the municipality 21 charges the utility a PILOT. The utility's absorption of PFP costs is frequently considered the utility's "tax 22 23 equivalent" payment.

Q. What would be the effect on rates if PILOT were to beeliminated?

A. Under most any scenario for direct charging PFP, there

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will be a shifting of revenue requirement to all customers. The "Class Absorption" method makes the increase more uniform by class, but still the increase required would result in an average increase of 25.1%. The elimination of PILOT would mitigate the effect on all customers, while preserving the merits of direct charging for PFP. Schedule 2 of Exhibit _____(JAM-1) shows the cost of service results both including and excluding PILOT. The average increase decreases from 25.1% to 8.0% with customer class increases of 10%, 9%, 5%, and 7% respectively for Residential, Commercial, Industrial, and Public Authority.

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Q. Are there any other beneficial effects which, in your
opinion, would precipitate from the elimination of PILOT?
A. I have a good case in point. A municipal client of mine
recently was forced to file a rate increase request before
this Commission solely because of an increase in the "tax
equivalent" payment.

The utility had just added over \$1.2 million in mains to provide service to their industrial park area. Approximately 95% of the cost of these mains is being paid for from either by the TIF District or by front foot assessments. The utility's portion of the capital construction is minimal. There are no increases in operating expenses due to these additions to plant. There is no additional debt service to cover. Over 82% of the

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requested increase is due to an increase in PILOT. This simply doesn't make sense.

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The automatic escalation of the amount of money due to the municipality through this mechanism is unnecessary. If the municipality feels a need to receive a payment from the utility, why not call it a "franchise fee" and establish it at a fixed level, but not to exceed the maximum amount which would be due under Chapter 109 for the "tax equivalent" payment.

Q. Doesn't the Wisconsin Administrative Code require the
 charging of a tax equivalent?

13 A. I am not an attorney and therefore cannot give you a legal
14 opinion as to the requirement of this portion of the code,
15 however under PSC 109.02 it simply states that:

The maximum "tax equivalent" for any municipality utility (except a sewer utility) shall be determined by applying the local and school tax rates for the calendar year to the gross book value for the calendar year of plant plus materials and supplies multiplied by the assessment ratio for the municipality involved."

It does not appear to prohibit paying less than the "maximum" nor does it appear to mandate inclusion of a tax equivalent in the revenue requirement. It would seem that the establishment of a zero level or any level for the "tax equivalent" would be in compliance with the Code, so long as it does not exceed the maximum amount per the indicated calculations.

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Mr. Mayer, do have any specific recommendations out of the 1 Q. two alternative methods you have presented today? 2 Yes I do. Both methods have merits. The "Actual Fire 3 A. Flow" method is the most precise and recovers costs as 4 5 close as possible to the manner which caused the costs to be incurred in the first place. It is much more complex 6 7 than the "Class Absorption" method. There is great merit to simplicity. The elimination of the requirement to 8 9 estimate a municipality's fire flows coupled with the 10 mitigating rate effect on residential customers by 11 spreading the cost of PFP more on class demands makes the 12 "Class Absorption" method the one I strongly recommended.

No matter which method of direct charging PFP the Commission ultimately adopts, the elimination of PILOT should be included as non-optional for a utility electing to direct charge for PFP. The effect of eliminating these two charges at the same time eliminates most of the revenue effect between the utility and the municipality. The merits are too great to ignore.

Q. Does that conclude your direct testimony?

A. Yes it does.

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DIRECT CUSTOMER CHARGE

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FOR

PUBLIC FIRE PROTECTION

Docket 05-WI-100

Exhibit of John A. Mayer

November 1988

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FIRE FLOW DETERMINATION

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NON-RESIDENTIAL STRUCTURES **

PFP Category:						Formula:					
F F F	For Fire Flows For Fire Flows For Fire Flows For Fire Flows For Fire Flows For Fire Flows	0 to 1,501 to 3,001 to 4,501 to 6,001 to 7,501 to	3,000 4,500 6,000 7,500	Flow = 18 x F x Sqrt[A] F = 1.5 Wood Frame Construction F = 1.0 Ordinary Constr. (Non-Combust. walls) F = 0.8 Fully non-combustible Construction F = 0.6 Fire-resistive Construction A = Effective Area							
Effec. Area sq.ft.	Wood I Fire Flow Reqd.	Frame PFP Category	Ordinary Fire Flow Reqd.	Constr PFP Category	Non-Comb Fire Flow Reqd.	ustible PFP Category	Fire-Res Fire Flow Reqd.	sistive PFP Category			
				••••••			700				
1,000	850	1	570	1	460	1	300	1			
1,500	1,050	1	700	1	560	1	400				
2,000	1,210	1	800	1	640	1	500				
2,500	1,350	1	900	1	720	1	500 6 00				
3,000	1,480	1	990	1	790		600				
3,500	1,600	2	1,060	1	850		••••				
4,000	1,710	2	1,140	1	910	1	700				
4,500	1,810	2	1,210	1	970		700				
5,000	1,910	2	1,270	1	1,020	1	800				
6,000	2,090	2	1,390	1	1,120	1	800				
7,000	2,260	2	1,510	2	1,200	1	900				
8,000	2,410	2	1,610	2	1,290	1	1,000				
9,000	2,560	2	1,710	2	1,370	1	1,000				
10,000	2,700	2	1,800	2	1,440	1	1,100				
11,000	2,830	2	1,890	2	1,510	2	1,100				
12,000	2,960	2	1,970	2	1,580	2	1,200				
13,000	3,080	3	2,050	2	1,640	2	1,200				
14,000	3,190	3	2,130	2	1,700	2	1,300				
15,000	3,310	3	2,200	2	1,760	2	1,300				
16,000	3,420	3	2,280	2	1,820	2	1,400				
17,000	3,520	3	2,350	2	1,880	2	1,400				
18,000	3,620	3	2,410	. 2	1,930	2	1,400				
19,000	3,720	3	2,480	2	1,980	2	1,500				
20,000	3,820	3	2,550	2	2,040	2	1,500				
25,000	4,270	3	2,850	23	2,280	2	1,700				
30,000	4,680	4	3,120	3	2,490	2	1,900				
35,000	5,050	4	3,370	3	2,690	2	2,000				
40,000	5,400	4	3,600	3	2,880	2	2,200				
45,000	5,730	4	3,820	3	3,050	3	2,300				
50,000	6,040	5	4,020	3 3	3,220	3	2,400				
60,000	6,610	5	4,410	3	3,530	3	2,600				
70,000	7,140	5	4,760	4	3,810	3	2,900				
80,000	7,640	6	5,090	4	4,070	3	3,100				
90,000	8,100	6	5,400	4	4,320	3	3,200				
00,000	8,540	6	5,690	4	4,550	4	3,400				
50,000	10,460	6	6,970	5	5,580	4	4,200				
200,000	12,070	6	8,050	6	6,440	5	4,800				
300,000	14,790	6	9,860	6	7,890	6	5,900				

** Residential structures consists of all 1- and 2-family dwellings not exceeding 2 stories in height or greater than 3000 sq. ft. in area. Residential dwellings are to be classified as PFP #1.

MUNICIPAL WATER UTILITY

SUMMARY - ALLOCATION TO CUSTOMER CLASS

Description:		Total GWS Revenue Required	Resid.	Commi.	Indl.	Public Auth.	Fire Protect.	Munici- pality's Net Bill Fire Prot. less PILOT
SUMMARY - COST ALLOCATION TO CLASS:								
***************************************			ļ					
Standard Cost Study Results		\$481,040	\$227,054	\$89,774	\$131,528	\$32,684	\$120,553	\$38,406
PFP Collected on Equiv. Services		601,593	323,658	105,383	133,927	38,625	j 0	(82, 147)
PFP "Class Absorption" Method		601,593	285,193	114,352	161,147	40,901	0	(82,147)
PFP "Class Absorption" w/o PILOT		519,447	249,448	97,437	137,559	35,003	0 	0
Dollar Increase/(Decrease) from Cur	rent Method:						1	
PFP Collected on Equiv. Services	\$9.23 /qtr./eq. svc. *	\$120,553	\$96,604	\$15,609	\$2,399	\$5,941	(\$120,553)	(\$120,553)
PFP "Class Absorption" Method	\$2.12 /qtr./eq. svc. **	120,553	58,139	24,578	29,619	8,217	(120,553)	(120,553)
PFP "Class Absorption" w/o PILOT		38,407	22,394	7,663	6,031	2,319	(120,553)	(38,406)
Percent Increase/(Decrease) from Cu	irrent Method:							
PFP Collected on Equiv. Services		25.06%	42.55%	17.39%	1.82%	18.18%		-313.89%
PFP "Class Absorption" Method		25,06%	25.61%	27.38%	22.52%	25.14%	i	-313.89%
PFP "Class Absorption" w/o PILOT		7.98%	9.86%	8.54%	4.59%	7.10%		-100.00%
PILOT "Savings" Allocated to Class		82,146	35,745	16,915	23,588	5,898		
PILOT "Savings" Allocated to Class		•	•	20.59%	•	•		
PILOT "Savings" Allocated to Class		100.00%	43.51%	20.59%	28.71%	7.18%		

* Collection for ALL of Public Fire Protection costs through the fixed quarterly charge.

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** Collection for only HYDRANT RELATED fire protection charges through the fixed quarterly charge.

Schedule 2

_(JAM-1)