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west virginia department of environmental protection

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Division of Water and Waste Management  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: 304-926-0495 / Fax: 304-926-0463

Harold D. Ward, Cabinet Secretary  
dep.wv.gov

**MEMORANDUM**

**To:** Marie Prezioso, Chair  
Funding Committee  
Infrastructure and Jobs Development Council

**From:** Katheryn Emery, P. E.  
Sewer Technical Review Committee

**Date:** September 21, 2022

**Subject:** Center PSD  
Preliminary Application: 2022S-2209  
Phase II – Rock View/Route 97 Sewer Extension

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1. This committee has reviewed the preliminary application and engineering report submitted for the above referenced project in accordance with Chapter 31, Article 15A. It has been determined that the proposed project is:
  - a.  Consistent with the intent of the Infrastructure and Jobs Development Act and is the most cost-effective, environmentally sound alternative for solving the wastewater needs in this area.
  - b.  Not consistent with the Act and may not be the most cost effective, environmentally sound alternative for solving the wastewater needs in this area.
  - c.  Same as (a) above except that certain issues need to be addressed prior to design and construction as the attached comments indicate.
2. Our recommendation is that:
  - a.  The Funding Committee needs to review the proposed sources of funding to determine the best mix of grant and/or loan funds in accordance with applicable guidelines.
  - b.  The Funding Committee should recommend that the Council approve the proposed project and its funding plan.

Promoting a healthy environment.

- c. \_\_\_ The Funding Committee does not need to review the funding assumptions on this project because of deficiencies in the engineering report. The proposed project funding should be tabled until technical comments have been resolved.
- d. \_\_\_ This project should be referred to the Consolidation Committee.

3. Other remarks:

The proposed project will extend sewer service to 160 customers in the Rock View and Bearhole communities just outside the Town of Pineville..

The proposed total cost for this project is \$5,974,000 and the PSD is seeking a \$500,000 IJDC Grant, a \$1,634,000 ARC grant, a \$2,000,000 CWSRF Principal Forgiveness Loan, a \$1,800,000 AML PILOT grant, and a \$40,000 Wyoming County Commission Grant.

The project is not eligible for green funding, but is eligible for up to \$2,000,000 in principal forgiveness according to the 2023 IUP. The project will also need a waiver for both design and total engineering fees.

Attachments: Technical Comments

**Engineering Fees:**

Estimated construction cost =	\$ 4,305,000
Consultant's design fee =	\$ 495,000
Design fee percentage =	11.5%
Design fee per ASCE curve =	8.2%
Consultant's total fee =	\$ 1,120,700
Total fee percentage =	26.0%
Total fee per ASCE curve =	19.0%

**Preliminary Project Ratings:**

1. Public Health Benefits	15
3. Compliance with Standards	5
5. O & M Capabilities	2
6. Readiness to Proceed	0
8. Cost Effectiveness	1
10. Compliance with PSC Orders	0



STATE OF WEST VIRGINIA  
DEPARTMENT OF HEALTH AND HUMAN RESOURCES  
Bureau for Public Health  
Office of Environmental Health Service

Bill J. Crouch  
Cabinet Secretary

Ayne Amjad, MD, MPH  
Commissioner & State Health Officer

**MEMORANDUM**

**TO:** Jason Billups, P.E.  
DEP/Infrastructure Sewer Technical Review Committee

**FROM:** William S. Herold, Jr., P.E., Assistant Manager  
I/CD/Environmental Engineering Division

**DATE:** September 12, 2022

**SUBJECT:** Center PSD  
Preliminary Application **Project No.: 2022S-2209**  
Rock View & Bearhole Area Sewers  
Wyoming County

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**RECOMMENDATION:**

We have reviewed this preliminary application and recommend it be forwarded to the Funding Committee for review.

**PROJECT SCOPE:**

This preliminary application is to extend sewer service to 88 customers in the Rock View community and 22 customers in the Bearhole community. The project will consist of 110-1,000-gallon STEP Tanks; approximately 5,744 LF of 1 ½ ", 13,009 LF of 2", 3,818 LF of 3", and 3,185 LF of 4" force main; and modifications to existing Packaged WWTPs.

The cost per customer is **\$35,988**. Total estimated project cost is **\$5,974,000** (IJDC District 1 Grant: **\$500,000**; CWSRF Principal Forgiveness: **\$1,500,000**; CWSRF Green Funding Forgiveness: **\$500,000**; AML Grant: **\$1,800,000**; ARC Grant: **\$1,634,000**; and Wyoming County Commission: **\$40,000**).

**NEED FOR PROJECT:**

The Preliminary Engineering Report indicates the existing Rock View and Bearhole communities are currently served by individual septic tank soil absorption systems that have the potential to pollute/contaminate the groundwater.

**CONCERNS:**

None.

**PERMITS:**

A permit **will not be** required from the WV Bureau for Public Health prior to construction, since CWSRF funding is proposed.



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Harold D. Ward, Cabinet Secretary  
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### MEMORANDUM

**TO:** Kathy Emery, P.E., Director, DWWM

**FROM:** Jesse Rupe P.E., DWWM

**DATE:** September 12, 2022

**SUBJECT:** Center Public Service District  
Preliminary Application: IJDC No. 2022S-2209  
Rock View / Route 97 Extensions Project - Phase II

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### RECOMMENDATION

The IJDC Application and Preliminary Engineering Report prepared by Thompson and Litton for the above referenced project has been reviewed and is technically feasible.

### PROJECT DESCRIPTION

Center Public Service District (PSD) owns and operates a wastewater collection system and a 0.4 Million Gallon Per Day (MGD) wastewater treatment plant (WWTP). The PSD provides sewer service to approximately 734 total customers in Wyoming County, WV.

The proposed project is the second phase of a multi-phased project to address Inflow and Infiltration (I/I), treatment, and other issues in the PSD's collection system and service area. Phase II will encompass the extension of sewer service to the Rock View and Bearhole (Rt. 97) areas just out the Town of Pineville. Phase II will extend service to 140 new customers and consist of the installation of 110 Septic Tank Effluent Pump (STEP) tanks, installation of approximately 25,900 linear feet (LF) of multiple force mains, removal of two existing package plants, connection to the existing system, and all other necessary appurtenances.

The proposed total cost for this project is \$5,974,000.00 and the PSD intends to pursue a \$500,000.00 IJDC Grant, a \$500,000 CWSRF Green Debt Forgiveness Loan, a \$1,500,000 CWSRF Debt Forgiveness Loan, a \$1,800,000.00 AML Grant, a \$1,634,000 ARC Grant, and a

\$40,000 Wyoming County Commission Grant. The proposed monthly rate for 3,400 gallons is \$70.06 (2.06 % MHI).

## **NEED FOR PROJECT**

Center PSD is currently in the middle of a multi-phase project. The PER indicated that the majority of the PSD's collection system had reached the end of its useful life. The PSD has recently completed construction of the first phase, which included inflow and infiltration (I/I) rehab, as well as upgrades at the WWTP. In the most recent annual report prior to the completion of Phase I, 66% of the PSD's flow could be attributed to I/I. Flow monitoring after completion of Phase I has been promising in seeing a large reduction of I/I. The areas that will be served are currently being served by individual septic tanks and two package plants. Extending sewer service to these areas will eliminate these package plants and will assist in improving the water quality in the project area, as all of the streams in the project area are on the WVDEP 303d List.

## **DEFICIENCIES/COMMENTS**

- Existing customer flows need to be broken out and EDU calculations need to be included. Non-residential customer flows should also be converted to EDUs.
- All health department letters and all complaints need to be included in the PER.
- The Environmental section needs to be expanded and must discuss flood elevations, unavoidable impacts, and possible mitigative measures.
- The PER references the Rule 42 establishing the proposed user rate, but this information was not included in the PER. The proposed user rate included in this memo was found in the application.
- The PER does not state the proposed funding scenario. The proposed funding scenario included in this memo was found in the application.
- The PER should include a summary of the public health benefits.
- A fee variance will be required for both the design and total engineering fees.
- The PER will need to be developed into a facilities plan that meets CWSRF requirements if CWSRF is used.

### **Engineering Fees:**

Estimated construction cost =	\$ 4,305,000.00
Consultant's design fee =	\$ 495,000.00
Consultant's total fee =	\$ 1,120,700.00
Design fee percentage =	11.5 %
Design fee per ASCE curve =	8.2 %
Total fee percentage =	26.0 %
Total fee per ASCE curve =	19.0 %

### **Preliminary Project Ratings:**

Public Health Benefits:	15
Compliance with Standards:	5

# Public Service Commission of West Virginia

201 Brooks Street, P.O. Box 812  
Charleston, West Virginia 25323

Phone: (304) 340-0300  
Fax: (304) 340-0325



September 13, 2022

Ms. Kathy Emery, P. E.  
Office of Water Resources  
Department of Environmental Protection  
601 57<sup>th</sup> St.  
Charleston, West Virginia 25304

Re: Public Service Commission Staff Review Comments  
Application No. 2022S-2209  
Center PSD - Sewer  
Infrastructure Preliminary Application

Dear Ms. Emery:

As requested, the Technical Staff of the Public Service Commission of West Virginia has completed its review of the above-referenced Infrastructure application. In light of the District's current financial condition, we are recommending the application be:

forwarded to the Funding Committee

forwarded to the Consolidation Committee

return to the Applicant

Please advise if you have any questions.

Sincerely,

Jonathan M. Fowler, P.E.  
Engineering Division

JMF:vb

**PUBLIC SERVICE COMMISSION STAFF  
TECHNICAL REVIEW**

**DATE:** September 12, 2022

**PROJECT SPONSOR:** CENTER PUBLIC SERVICE DISTRICT - SEWER

**PROJECT SUMMARY:** To extend sewer service to the Rock View and Bearhole communities of Wyoming County, West Virginia.

<b>PROPOSED FUNDING:</b>	AML Grant	\$1,800,000
	ARC Grant	\$1,634,000
	CWSRF Principal Forgiveness Loan	\$1,500,000
	CWSRF Green Funding Forgiveness Loan	\$500,000
	IJDC Grant	\$500,000
	Wyoming County Commission Grant	<u>\$40,000</u>
	Total	\$5,974,000

**CURRENT RATES:** \$65.07 3,400 gallons  
\$72.78 4,000 gallons

**PROPOSED RATES:** \$70.06 3,400 gallons  
\$78.36 4,000 gallons

Application No. 2022S-2209

**RECOMMENDATION:**  forward to the Funding Committee.  
 forward to the Consolidation Committee.  
 return to the Applicant.

**FINANCIAL:** Kaitlyn J. Shamblin

1. Current rates (\$65.07 for 3,400 gallons) are above the rates attributable to 1.25% (\$45.93), 1.5% (\$55.12), and 1.75% (\$64.31) of the Median Household Income (MHI), but below the rates attributable to 2% (\$73.49) of the MHI. Increasing current rates to 2% of MHI would provide additional revenues of \$88,975.
2. Using Scenario 1, the preferred funding package consisting of an AML Grant of \$1,800,000, an ARC Grant of \$1,634,000, a CWSRF Principal Forgiveness Loan of \$1,500,000, a CWSRF Green Funding Forgiveness Loan of \$500,000,

an IJDC Grant of \$500,000, and a Wyoming County Commission Grant of \$40,000, proposed rates (\$70.06 for 3,400 gallons) will provide a cash flow surplus of \$79,479 and debt service coverage of 183.53%.

3. Using the Scenario 2 alternate loan package of \$5,934,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years) and committed funds consisting of a Wyoming County Commission Grant of \$40,000, proposed rates (\$97.87 for 3,400 gallons) will provide a cash flow deficit of \$5,223 and debt service coverage of 123.58%. An additional 0.5% (for a total of \$98.36 for 3,400 gallons) increase in proposed rates will be required in order to provide a cash flow surplus of \$42 and debt service coverage of 124.54%.
4. Notes to Comments:
  - A. Staff's detailed adjustments are listed on Attachment A for Scenario 1 (Preferred Funding Package) and Attachment B for Scenario 2 (Loan Package).
  - B. Staff prepared the attached Cash Flow Analysis utilizing information from the Annual Report for the Fiscal Year Ended June 30, 2021 and the Applicant's Cash Flow Analysis submitted with the application.
  - C. Staff notes that the Applicant's Cash Flow Analysis reflects a going-level rate of \$70.06 (3,400 gallons), which is an increase of approximately 7.67% over the current rate. This going-level rate is the Staff Recommended Step 2 rate from the Applicant's pending rate case with the Commission (Case No. 22-0271-PSD-19A). Per the accountant for the Applicant, Staff Recommended Step 2 rates are the rates expected to be in effect at the time this project is completed. For purposes of this review, Staff accepted and used this rate in its going-level analysis.
  - D. Staff notes the going-level column of the Applicant's Cash Flow Analysis is the Staff Recommended Step 2 rate column from the aforementioned pending rate case. For purposes of this review, Staff accepted and used the Applicant's going-level figures in its going-level analysis.
  - E. Because proposed funding is based on all grant funding and no rate increase is needed for this project, the applicant is requesting a waiver of the Rule 42 Exhibit requirement.
  - F. Senate Bill 234, effective June 12, 2015, required water and sewer utilities



that are political subdivisions of the state to maintain a cash working capital reserve in an amount of no less than one-eighth (1/8) of actual annual operation and maintenance expenses. It should be noted that the cash flows provided by the project sponsor include funding for the 1/8 cash working capital reserve. Staff accepted that amount in its analyses. However, this amount may be reviewed by the Commission in future filings in accordance with Public Service Commission General Order 183.11

**ENGINEERING:** Mansour Mashayekhi

1. This project may not will require a Certificate of Convenience and Necessity from the PSC, the utility should consult with Commission Staff pursuant to General Order 246 for such determination. If a Certificate is required, the utility should reference this application number on the PSC's Form No. 4 when its application is filed at the Commission given the requirement of West Virginia Code §24-2-11 (c) and (e) *et seq.*
2. **Scope:** The project includes constructing two (2) sewer extensions using STEP (Septic Tank Effluent Pump) systems. STEP Units will be installed at every home. Major construction elements include the following: a) 1-1/2-inch Force main 5,800 L.F., b) 2-inch Force main 13,100 L.F., c) 3-inch Force main 3,900 L.F., and d) 4-inch Force main 3,100 L.F. The project is estimated to cost \$5,974,000.
3. **Need for Project:** Privately owned septic systems that aren't well installed or maintained may contaminate groundwater and surface water in the immediate and surrounding areas.
4. **Customer Density:** The project density for new 166 customers will be approximately 33.81 customers-per-mile which is acceptable.
5. **Cost per Customer:** Based upon the estimated project budget of \$5,974,000 and having approximately 166 new extension, cost-per-customer is approximately \$36,000. However, it appears that the project is fully grant funded; therefore, current and new customers bear no capital project related expenses.
6. **Project Feasibility:** This project appears to be technically feasible and poses little technical risk. STEP systems are proven technology and can be cost-effective if applied under appropriate conditions.
7. **Project Alternatives:** This proposed project aims to accomplish three separate

goals: to install new sewer collection system in Rock View (North of Pineville), install new sewer collection system on the South side of Rt. 97 Bearhole Road (East of Pineville), and to relocate problematic lines along Rt. 10. Eight (8) alternatives for the three (3) different project locations were evaluated using the information provided in Section 5 of the PER. The STEP collection system was the recommended for this project (extensions) and Staff has no objections. (Note that replacing the existing problematic gravity lines will be a future “Phase III” project.)

8. **Consolidation:** There are no consolidation issues with the selected alternatives.
9. **Inconsistencies:** None was noticed for this project.
10. **Project Permits:** Department of Highways (DOH) Permit, NPDES Permit, Corps of Engineers Permit, Public Land Corporation Permits. Health Permit, Utility & Temporary Construction Easements will be required for the collection system replacement and extension, Town of Pineville Building Permit, and Town of Pineville Agreement for Road Repair for road repairs per DOH specifications.
11. **Operation and Maintenance (O&M) Expenses:** The project’s O&M expenses are expected to be approximately \$54,316 to a total annual O&M expense of \$458,699.
12. **Engineering Agreement:** The applicant has provided documentation relative to compliance with West Virginia Code §5G-1-1, et seq. Based on the filing, the total design fees for engineering services are \$495,000 at the construction cost of \$4,305,000. This is approximately 11.5 % of the construction costs as shown on the application.

<b>Preliminary Project Ranking</b>		
O & M Capabilities		
Performance Measures:	1	Pt.
Asset Management:	0	Pt.
Environmental Management:	1	Pt.
Readiness to Proceed:	0	Pt.
Cost Effectiveness:	1	Pt.
Compliance with PSC Orders:	0	Pt.

CENTER PUBLIC SERVICE DISTRICT - SEWER  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2021  
 APPLICATION NO: 2022S-2209  
 September 12, 2022

**PREFERRED FUNDING PACKAGE  
 SCENARIO 1**

	Cash Flow Going Level Per Application Before Project	Cash Flow Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<b><u>AVAILABLE CASH</u></b>				
Operating Revenues	688,222	827,782	(57,337) (1)	770,445
Other Operating Revenue	27,363	27,363	-	27,363
SB 234 Annual Working Cash Collections			57,337 (2)	57,337
Interest Income & Other Misc.	150	150	-	150
<b>Total Cash Available</b>	<b>715,735</b>	<b>855,295</b>	<b>-</b>	<b>855,295</b>
<b><u>OPERATING DEDUCTIONS</u></b>				
Operating Expenses	404,383	458,699	-	458,699
Taxes	14,838	14,838	-	14,838
<b>Total Cash Requirements Before Debt Service</b>	<b>419,221</b>	<b>473,537</b>	<b>-</b>	<b>473,537</b>
<b>Cash Available for Debt Service (A)</b>	<b>296,514</b>	<b>381,758</b>	<b>-</b>	<b>381,758</b>
<b><u>DEBT SERVICE REQUIREMENTS</u></b>				
Principal & Interest (B)	208,011	208,011	-	208,011
Other Debt	9,419	9,419	-	9,419
Reserve Account @ 10%	7,567	7,567	-	7,567
Renewal & Replacement Fund (2.5%)	17,893	21,382	(1,437) (3)	19,945
<b>Total Debt Service Requirement</b>	<b>242,890</b>	<b>246,379</b>	<b>(1,437)</b>	<b>244,942</b>
<b>SB 234 Cash Working Capital</b>	<b>50,548</b>	<b>57,337</b>	<b>-</b>	<b>57,337</b>
<b>Remaining Cash</b>	<b>3,076</b>	<b>78,042</b>	<b>1,437</b>	<b>79,479</b>
<b>Percent Coverage (A) / (B)</b>	<b>142.55%</b>	<b>183.53%</b>		<b>183.53%</b>
Average rate for 3,400 gallons	\$ 70.06	\$ 70.06	\$ -	\$ 70.06
Average rate for 4,000 gallons	\$ 78.36	\$ 78.36	\$ -	\$ 78.36

CENTER PUBLIC SERVICE DISTRICT - SEWER  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2021  
 APPLICATION NO: 2022S-2209

Attachment A  
 PREFERRED FUNDING PACKAGE  
 SCENARIO 1

Staff Adjustments

<u>Adjustment Description</u>			\$	Increase <Decrease>
(1)	<b>Operating Revenues</b>	<b>Per Staff Analysis</b>	770,445	(57,337)
		<b>Per Application with Project</b>	827,782	
	Adjust revenues in accordance with PSC General Order 183.11.			
(2)	<b>SB 234 Annual Working Cash Collections</b>	<b>Per Staff Analysis</b>	57,337	57,337
		<b>Per Application with Project</b>	-	
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3)	<b>Renewal &amp; Replacement Fund (2.5%)</b>	<b>Per Staff Analysis</b>	19,945	(1,437)
		<b>Per Application with Project</b>	21,382	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

CENTER PUBLIC SERVICE DISTRICT - SEWER  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2021  
 APPLICATION NO: 2022S-2209  
 September 12, 2022

LOAN PACKAGE  
 SCENARIO 2

	Cash Flow Going Level Per Application Before Project	Cash Flow Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<u>AVAILABLE CASH</u>				
Operating Revenues	688,222	1,137,803	(51,937) (1)	1,085,866
Other Operating Revenue	27,363	27,363	-	27,363
SB 234 Annual Working Cash Collections			57,337 (2)	57,337
Interest Income & Other Misc.	150	150	-	150
<b>Total Cash Available</b>	<b>715,735</b>	<b>1,165,316</b>	<b>5,400</b>	<b>1,170,716</b>
<u>OPERATING DEDUCTIONS</u>				
Operating Expenses	404,383	458,699	-	458,699
Taxes	14,838	14,838	-	14,838
<b>Total Cash Requirements Before Debt Service</b>	<b>419,221</b>	<b>473,537</b>	<b>-</b>	<b>473,537</b>
Cash Available for Debt Service (A)	296,514	691,779	5,400	697,179
<u>DEBT SERVICE REQUIREMENTS</u>				
Principal & Interest (B)	208,011	553,688	6,116 (3)	559,804
Other Debt	9,419	9,419	-	9,419
Reserve Account @ 10%	7,567	42,135	611 (4)	42,746
Renewal & Replacement Fund (2.5%)	17,893	29,133	(1,302) (5)	27,831
<b>Total Debt Service Requirement</b>	<b>242,890</b>	<b>634,375</b>	<b>5,425</b>	<b>639,800</b>
SB 234 Cash Working Capital	50,548	57,337	-	57,337
<b>Remaining Cash</b>	<b>3,076</b>	<b>67</b>	<b>(25)</b>	<b>42</b>
Percent Coverage (A) / (B)	142.55%	124.94%		124.54%
Average rate for 3,400 gallons	\$ 70.06	\$ 97.87	\$ 0.49	\$ 98.36
Average rate for 4,000 gallons	\$ 78.36	\$ 109.46	\$ 0.55	\$ 110.01

CENTER PUBLIC SERVICE DISTRICT - SEWER  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2021  
 APPLICATION NO: 2022S-2209  
 September 12, 2022

LOAN PACKAGE  
 SCENARIO 2

	Cash Flow Going Level Per Application Before Project	Cash Flow Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<b>AVAILABLE CASH</b>				
Operating Revenues	688,222	1,137,803	(51,937) (1)	1,085,866
Other Operating Revenue	27,363	27,363	-	27,363
SB 234 Annual Working Cash Collections			57,337 (2)	57,337
Interest Income & Other Misc.	150	150	-	150
<b>Total Cash Available</b>	<b>715,735</b>	<b>1,165,316</b>	<b>5,400</b>	<b>1,170,716</b>
<b>OPERATING DEDUCTIONS</b>				
Operating Expenses	404,383	458,699	-	458,699
Taxes	14,838	14,838	-	14,838
<b>Total Cash Requirements Before Debt Service</b>	<b>419,221</b>	<b>473,537</b>	<b>-</b>	<b>473,537</b>
Cash Available for Debt Service (A)	296,514	691,779	5,400	697,179
<b>DEBT SERVICE REQUIREMENTS</b>				
Principal & Interest (B)	208,011	553,688	6,116 (3)	559,804
Other Debt	9,419	9,419	-	9,419
Reserve Account @ 10%	7,567	42,135	611 (4)	42,746
Renewal & Replacement Fund (2.5%)	17,893	29,133	(1,302) (5)	27,831
<b>Total Debt Service Requirement</b>	<b>242,890</b>	<b>634,375</b>	<b>5,425</b>	<b>639,800</b>
SB 234 Cash Working Capital	50,548	57,337	-	57,337
<b>Remaining Cash</b>	<b>3,076</b>	<b>67</b>	<b>(25)</b>	<b>42</b>
Percent Coverage (A) / (B)	142.55%	124.94%		124.54%
Average rate for 3,400 gallons	\$ 70.06	\$ 97.87	\$ 0.49	\$ 98.36
Average rate for 4,000 gallons	\$ 78.36	\$ 109.46	\$ 0.55	\$ 110.01