

HELEN CHRISTIAN

~~XX~~, Richmond, St. Ann

November 4, 2022

Mr. Frederick Bennett
Director
Richmond Environmental Services Limited
Shop G5, Praise Concourse Plaza
18 Queens Drive
Montego Bay

Dear Mr. Bennett,

On October 4, 2022, the homeowners and residents of the Ferncourt Apartment Complex, Richmond, received an email inviting us to a virtual meeting scheduled for October 30, 2022 to facilitate two-way communication for homeowners and residents to express our concerns – if any – regarding the tariff application submitted by the water and sewerage services utility provider, Richmond Environmental Services Limited (RESL).

The link to the tariff application dated August 17, 2022 on the Office of Utilities Regulation's (OUR's) website was included in the email. In this document, RESL was requesting a rate review.

While the regulator facilitated this meeting with a view to maintaining its stance on transparency and engagement with stakeholders prior to its decision-making, it is unfortunate that up to this date, the homeowners and residents who would be asked to pay this increase were never formally notified of RESL's intention to apply for a rate increase. Perhaps you didn't think this necessary since the application was submitted under a ...'No Objection Policy' as the rates then were below those charged by the National Water Commission for comparable services".

In paragraph 3 on Page 2 of the submission to Ms. Diana Cummings, Manager, Licensing and Regulatory Affairs at the OUR dated August 17, 2022, you refer to "...it will be noted from the audited financial statements and the unaudited management accounts that the repairs and maintenance cost is...". These documents were not on the OUR's website and if they form an integral part of your submission, should be made available to the homeowners and residents for our consideration as well. Without these documents, on which you have based your request for a rate increase, we are unable to determine if the increase is in fact warranted. Using a comparison to National Water Commission's (NWC's) rates is not a sufficient reason to apply for a rate increase.

Your tariff application also speaks to the introduction of additional charges for size of meter or service connection ranging from \$715.00 - \$6,000.00, to maintain a reconnection fee of \$6,000.00 (NWC = \$4,470.00) and the introduction of the Price Adjustment Mechanism (PAM) used by the NWC; a methodology which was not explained, except by reference to what is done by the NWC. RESL did not provide an example of how RESL will perform its own PAM calculation nor what would happen if there is an overcharge/undercharge of PAM.

All these fees being introduced all at once will be onerous on every homeowner and resident. Further, the application as it stands does not provide us with sufficient information to justify the level of increases requested.

I therefore object to the rate increase being proposed by RESL, ranging from 160% to 395%, the introduction of a charge based on size of meter or service connection, and the introduction of PAM, both as an individual homeowner and on behalf of the Executive Committee of PSP #2796 of Ferncourt Apartment Complex.

Sincerely,

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Helen Christian
PSP# 2796 Executive Committee Member

Cc: Mr. Jovane Reid, Financial Controller, Richmond Development Company Ltd.