

Municipal Services Commission
Monthly Meeting
April 25, 2016, 4 p.m.
216 Chestnut Street
New Castle, Delaware

The meeting was called to order at 4 p.m. with Dr. Roy Sippel, Commissioner, presiding.

Present: Dr. Roy J. Sippel, Commissioner, President
Daniel F. Knox, Commissioner
Hickman Rowland, Commissioner
Pamela A. Patone, Secretary

Staff in Attendance: Mary Jane Stubbs, Business Manager/Treasurer; Jay Guyer, Water Supervisor; Scott Blomquist, Electric Supervisor.

Secretary Patone asked for permission to add to the agenda discussion on an amendment to the pension plan for summary of material modifications. Permission granted.

Minutes – Corrections were noted.

A motion was made and seconded to approve the minutes of the 3/28/16 monthly meeting as amended. Motion approved by unanimous vote.

A motion was made and seconded to approve the executive session minutes for 3/28/16. Motion approved by unanimous vote.

Election of President and Appointment of Secretary and Treasurer

A motion was made to nominate Dr. Roy Sippel for the office of President. Motion was seconded and approved by unanimous vote.

A motion was made to appoint Pamela Patone as Secretary and Mary Jane Stubbs as Treasurer and all the staff appointments to the State Commissions and Boards as identified on the agenda. The motion was seconded and approved by unanimous vote.

Treasurer's Report – Treasurer Stubbs reporting

Treasurer Stubbs reported a total cash balance of \$2,602,300.63; PNC escrow and meter deposit total in the amount of \$725,559.01. Total operating cash balance is \$1,876,741.63. Total investments are \$1,035,512.48. Treasurer Stubbs reported that Scott Blomquist reviewed the bank statements and she was able to answer his questions. The check book register is attached to her report.

Secretary Patone pointed out two large disbursements: \$330,000 for Greggo & Ferrara and the last quarterly payment for the fiscal year for the City of \$134,375.

Secretary Patone explained how calculations for the next fiscal year's payments are done. Once the audit is complete the numbers will be solid and payments will be made against them. We accrue monthly and payments are made quarterly. The first payment will be made by June 30th. Secretary Patone estimates \$665,000 compared to \$538,500 this year. The City will be paying about \$80,000-\$90,000 for their electric usage. (The City operates on a fiscal year of 7/31-6/30.)

A motion was made and seconded to approve the disbursements as presented. Motion approved. (Treasurer Stubbs was excused from the meeting.)

Electric Department Report – Scott Blomquist reporting

See attached report.

A motion was made and seconded to sell a bucket truck for \$10,000 to the City after maintenance is performed on it, and then move forward with purchasing a replacement truck. Motion approved by unanimous vote.

Water Department – Jay Guyer reporting.
See attached report.

(With no further business to discuss, Supervisors Blomquist and Guyer were thanked and left the meeting.)

Financial Report Executive Summary – Secretary Patone reporting.
(For the 12-month period ending 3/31/16) – Secretary Patone reported not all information has been received from the actuary. We are still in the process of finalizing some jobs and capitalizing jobs so there may be some changes in depreciation figures.

Revenues & expenses: Change in net assets -- \$86,000 excess of net assets without audit entries and without the USDA figure of \$500,000. She noted several GAAP entries (capitalized labor, non-operating items, private developer contributions) that have been removed to better reflect budget v. actual. Of the \$86,000 -- \$44,000 is water and \$42,000 is related to electric.

Mr. Knox asked if we are being more conscientious now about capitalizing water and electric and wonders if we are seeing a spike in depreciation expense because of capitalizing more labor. During her tenure Secretary Patone has been consistent with capitalizing special projects. Secretary Patone capitalizes labor associated with in-house projects.

Secretary Patone attended a course on rate structures. She is trying to make sure our fixed asset list is as comparable to what our infrastructure is. She wants to make sure we are capturing the complete value of our fixed assets. Depreciation versus value of total assets is considered when rate structures are created. They also look to see if you are investing in your infrastructure. Secretary Patone requested that the instructor send her comparables on fixed assets from other like-size utilities.

Secretary Patone further reported that we knew revenues would be down. Associated purchase of power was down 2.55% and user charges were down from what was budgeted. She said that expenses are down 2.67%. We have stayed within 6%-7% of our operating expenses and general administrative expenses.

Secretary Patone informed a bill for attorney's fees (~\$1,200) through 3/31/16 was just received. There are other invoices not yet received. They will be reflected in next month's financials. She does not expect user charges to change.

Audit -- Auditors are scheduled for the first week in June to do field work. We anticipate them to be here 4-5 days. Secretary Patone will have a staff person start working on revenue paperwork that comes from reports from the utility billing that will be needed for the audit.

Secretary's Report – Secretary Patone reporting.
DEMEC – President Sippel and Secretary Patone attended the 4/19/16 meeting. Baker Tilly presented the audited financial statements. There were no adjusting journal entries. They did make one

recommendation to upgrade their accounting software. They are currently using QuickBooks. They are looking at different products and implementation is not expected for 1-2 years.

The board voted to add Tyler Reynolds, Finance Director for the Town of Middletown, to the Audit Committee. The next meeting is 4/28/16.

One resolution was presented to amend the corporate risk management policy. The resolution added the word "fuel" to some transactions giving them the authorization to execute fuel and energy transactions. This is mainly because the fuel tanks for Beasley increases their dispatch capability.

Staff updated on the construction of the 250,000 fuel tank and provided photographs of construction. The tank has a sealed lid.

Beasley vibration issues with the clutch assembly -- The problem has been resolved. GE acknowledged the 180 degree misalignment has existed since the beginning. They estimate spending about \$1m; DEMEC did not pay for anything.

Town of Middletown -- We received an update on the data center. They are still experiencing delays associated with the right of way and are working with Delmarva to resolve. A FOIA request has been submitted to DEMEC relating to this project.

There was ongoing discussion about cheaper gas downstate. It is speculated that permitting costs would impede a gas pipeline to lower Delaware.

Gas Agreement -- Last year the agreement was with NJR. Direct Energy was awarded the contract this year. They presented the lowest bid.

DEMEC staff met with Senator Bonini. The senator suggested municipalities are hurting economic development. DEMEC staff explained that several businesses coming into municipalities are coming to DEMEC for their electric needs. The thinking is that Senator Bonini took note of the information provided to him. We have enough documentation to support that we are not dragging down economic development.

Scott Lynch reported on energy efficiency -- solar and renewable. There was a push to get onboard with energy efficiency programs. We spend our green energy money on the solar program, but Secretary Patone anticipates having a discussion in the next few months about where to use green energy money going forward.

Solar Legislation -- A draft is being proposed that would change the solar legislation to be more clear about different groups that are selling solar programs and what they are able to do. Contracts should be reviewed. Last year MSC started having Scott Lynch look at our contracts to make sure there are no PPA's embedded in the contract and that they are not trying to exceed the 110 capacity of demand at that location. We are trying to protect our citizens. There are companies writing very bad contracts that people are signing not knowing the negative impacts involved. Solar City has been identified as one such company.

Beasley experienced three outages; all maintenance related.

Every year at this time the staff sends out an evaluation form rating performance of DEMEC staff. Secretary Patone welcomed Commissioners' input. The form needs to be submitted tomorrow.

President Sippel commended Pat McCullar, President and CEO, and Kimberly Schlichting, Senior Vice President, for the work both has done this past year. Secretary Patone will complete the evaluation form and send a copy to President Sippel.

Secretary Patone informed the annual financial report for DEMEC features the City of New Castle on the front page.

Earth Day – This is MSC's fourth year putting out a ballot box offering a free tree. Winners have been selected and Secretary Patone would like to get pictures with Mr. Sippel and the winners.

OLD BUSINESS

City Negotiations & Charter Change – Representative Mulrooney's assistant contacted Secretary Patone stating the representative had reviewed everything and wanted our attorney to review their final document. Dan McCollom, Esq. reviewed the document this morning and signed off on it. Representative Mulrooney wants to submit it this week. Representative Mulrooney will reach out to President Sippel and Secretary Patone to come to Legislative Hall for support when it is presented. This is anticipated to take place in the next two weeks.

Leases – We are working with our attorney to develop the lease for the three properties that MSC occupies and are owned by the City. She has provided Mr. McCollom with maps of our land and where our buildings are located to provide with the lease. He will have the lease back to City Solicitor Dan Losco later this week in the hope that leases can be signed simultaneous with the charter change.

Free City Services – Secretary Patone continues to gather information. She reached out to APPA members with questions and has made contact directly with DEMEC and certain municipalities about how they fund their libraries, fire companies and the like. The consensus was to gather as much information as possible, noting the complexity of the issue.

Philadelphia Gear – Commissioners previously agreed to add this to the tariff. Secretary Patone has made the change to the tariff. She reviewed with Mr. Blomquist and realized the power factor should be changed from 99% to 98.5% to keep uniform with the rest of the tariff.

A new classification titled "General Service Commercial Rate-Primary" would be put in the tariff and will operate the same way that we have been operating with Philadelphia Gear. There is a large customer charge because it is labor intensive. Philadelphia Gear acknowledges they understand why we need to increase the customer charge.

A motion was made to add the new classification to the tariff. Motion was seconded and approved by unanimous vote.

NEW BUSINESS

Trustees of the New Castle Common Bill of Sale – Secretary Patone recommends waiting to sign off until the leases and charter change have been signed. The Trustees document indicates they have sold the property that MSC occupies to the City.

Employee Handbook – *(Sent electronically.)* The handbooks implement all the changes adopted during union negotiations--non-union and exempt employees. Secretary Patone reviewed the significant changes.

A motion was made and seconded to adopt the new employee handbook. The motion was approved by unanimous vote. *(The handbook will be provided to employees tomorrow.)*

DEMEC and CPower – Each year both ask for approval to be the exclusive provider of demand response and other demand response ordinance allowed related service within the City of New Castle. A copy of

a letter template was provided to Commissioners. All DEMEC members vote on this. We do not currently have any customers on the demand response program. We are considering working with Scott Lynch to accumulate some of our properties to see if we can take advantage of some demand response incentives.

A motion was made to approve CPower as the provider of demand response. Motion was seconded and approved by unanimous vote.

Secretary Patone noted three adjustments for the tariff for discussion.
Logo – Implementing a new logo for the tariff.

Credit Score Scale -- Secretary Patone sent Commissioners the credit score scale with her new recommendations. The deposit can range from \$0-\$300 based on your credit score for residential. She wants to increase the range to \$500 and have two other levels, \$150 and \$300 to remind residents that after 24 months if they pay their bills on time they will get that money back. We can also allow customers to pay every six months and add to their bill rather than pay a significant deposit up front. We have the most problem with renters.

Application Fee -- The \$5 application fee to run credit scores has increased to \$9. Secretary Patone recommends raising the application fee on credit scores to \$10 to cover costs.

A motion was made and seconded to make the adjustments to the tariff as presented. Motion approved by unanimous vote.

A motion was made and seconded to enter Executive Session at 5:49 p.m. to discuss a personnel matter.

General session resumed at 6:03 p.m.

Next Meeting

Commissioners set the next monthly Board meeting to be 5/24/16 at the office of the Commission, 216 Chestnut Street, New Castle, Delaware.

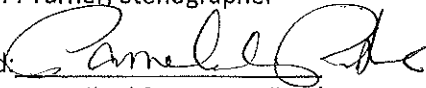
Municipal Services Commission Minutes
April 25, 2016

ADJOURNMENT

A motion was made and seconded to adjourn the meeting. Motion received unanimous approval.
The meeting adjourned at 6:05 p.m.



Deborah P. Turner, Stenographer

Approved:  5-31-16
(Minutes transcribed from recording.)

ELECTRIC DEPARTMENT COMMISSION REPORT

April 25, 2016

Prepared by Scott Blomquist on April 18, 2016

1. **Projects:**

a. **Riverbend:**

1. There has been no contact with the Electric Department over the last month.

b. **2, 4, and 8 Meehan:**

1. The electric installation to 8 Meehan is complete; we are waiting for Rocky to build 2 and 4.

c. **224 and 226 East 2nd Street**

1. George Velitskakis asked if we could give him a cost to install the electric to 224 and 226 East 2nd Street. Supervisor Blomquist prepared an estimate and supplied it via email to George in the amount of \$7,661.54. At this point there has been no contact for this project.

2. **Capital Projects:**

a. **Solar Array:**

1. We received the application for the SREC's. Supervisor Blomquist will work with Secretary Patone to complete the application. Supervisor Blomquist worked with CSR McHugh and SCR Lynch to get the meter installed in Billmaster.

b. **Booker Circle:**

1. The Electric Department is actively working on the installation of conduit when weather permits. All of the concrete that we disturbed installing conduits from the first transformer location to the houses has been replaced. When the weather isn't as cooperative and we cannot excavate, the electric crew will start the installation of wire and converting customers to the new underground distribution lines.

ELECTRIC DEPARTMENT COMMISSION REPORT

April 25, 2016

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3. Operations:

a. We had one outage over the last month. The outage was at 311 Balt and was caused by a failed lightning arrester. There were 35 Customers affected for a total of 45 minutes.

b. **Outages :**

1. 4/1/15 – 4/1/16

SAIDI (minutes)	SAIFI (number of interruptions)	CAIDI (minutes)	ASAI (percent)
56.232	0.7	79.73	99.99

SSAIDI - is the average outage duration for each customer served.

SAIFI - is the average number of interruptions that a customer would experience.

CAIDI - gives the average outage duration that any given customer would experience.

ASAI - is the Average Service Availability Index.

4. Repairs and Maintenance:

a. **System:**

i. Vandyke Village:

i. There is nothing to update on this project.

b. **Wilmington Road Substation:**

ELECTRIC DEPARTMENT COMMISSION REPORT

April 25, 2016

Prepared by Scott Blomquist on April 18, 2016

- i. There is nothing to update for this location.

- c. **Dobbinsville Substation:**
 - i. There is nothing to update for this location.

- d. **Equipment:**
 - i. **New Mini Excavator:**
 - i. The new Mini Excavator was received and has been very useful on the Booker Circle Project. It was also used by the Water Department along with the air mole to install the water service to the new green house on the Penn Farm.

- e. **Metering:**
 - i. We found two meters in our system that have an issue with the meter clock running fast. One is at the Firehouse and one is at Knots Bus Company. This particular meter type is uncommon in our system. When the meter clock runs fast and gains time its billing cycle is shortened. When this happens the KWH is under billed each month until there is a moth that has two demand resets at which time the KWH is brought up to a true up state. The demand charges on the other hand double charge that month. The Firehouse doesn't pay a demand charge so ultimately they are unaffected. Knots does pay a demand charge. From what we can tell the meters have been running faster than normal since they were installed in 2005. They were both a total of 797 days fast. This is not a programing issue but a manufacturing issue; we are working with Itron to see what needs to be done to correct this issue. As far as we can tell these two locations are the only two locations that we have that have this issue.

- f. **Office Software:**
 - i. **Tyler Technologies:**

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ELECTRIC DEPARTMENT COMMISSION REPORT

April 25, 2016

Prepared by Scott Blomquist on April 18, 2016

1. Several of us went down to La Plata, MD to get some hands on time with the Tyler Technologies software. Over all Supervisor Blomquist liked the software and the features that were offered. Because of the differences in business, La Plata only uses some of the feature we would like to use. Of the ones that we would both use they were very helpful with showing us how these features operated. They also recommended two other vendors for the MSC to investigate.

ii. Edmunds:

1. We went to the Edmunds User's conference in Dover. They showed us the newest version of the software. We were able to sit with other towns that use this software and get a feeling of their likes and dislikes. Supervisor Blomquist feels that Edmunds may be a little small and that we may experience support issues in the future.

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Water Department Commission Meeting Report

April 25, 2016

Prepared By: Jay Guyer on April 18, 2016

1. Projects

A. Riverbend Subdivision

1. The water system in Riverbend was flushed on April 4th.

B. Penn Farm Redevelopment

1. The new 2" water service for the front field greenhouse was installed and put into service on April 14th. All DeIDOT requirements were meant for working in their Right of Way. The expense for this service will be billed to the Trustees for reimbursement.

C. Water Metering

1. Water Operators completed meter reads on April 12th. Water Operators followed up on water check reads as needed for the month and high/low/zero consumption reads were addressed with customers and missed reads collected.

D. Distribution System – Water Main Renewal Program

1. Pipe sample results from Echologic's Lab have not been finalized. Supervisors Guyer and Jaeger have had several conversations with Mr. Jeff Rice of Echologics discussing the pipe samples condition post sandblasting. Pitting and graphitization was noted on both the exterior and interior pipe samples. Echologics are sending the pipe samples to a lab for structural testing and Mr. Rice will follow up when he has more information. Supervisor Guyer has reached out to the McWane Ductile Iron and the Ductile Iron Pipe Research Association (DIPRA) who provided guidance on the testing process and 2 Labs for testing MSC pipe samples. MSC Operators collected soil samples from around the 6" mains in Dobbinsville and sent them to DIPRA who offered to test the corrosiveness of the soils around the Cast Iron Pipe at no charge. Per our DIPRA Regional Representative Allen Cox, DIPRA would be very interested in documenting the process MSC has undertaken to evaluate the condition of our distribution system mains and determining a path forward for renewal or replacement. He will follow up when he has the soil sample results.
2. RT – 9 Water Main Project is 95 % complete. Greggo and Ferrara (GF) completed all Punch List Items and final paving restoration at the Intersections of Clark, Center and Clymer Streets is being scheduled. GF has not invoiced MSC for the final \$18,000.00 owed for the project.

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Water Department Commission Meeting Report

April 25, 2016

Prepared By: Jay Guyer on April 18, 2016

- Supervisors Guyer and Jaeger met with Eric Mayer to discuss installing the new water main for his approved apartment complex on 7th Street prior to final paving being completed by Del DOT. Mr. Mayer had McBride & Ziegler forward a set of proposed water plans for review. Water and Electric comments are being added to the plans so a follow up meeting can be scheduled with Mr. Mayer to review them.

E. Cross Roads Well – Penn Farm

- Final SCADA Integration and testing with Keystone Engineering is complete. All well controls are functioning in SCADA and Security Instruments completed tying in all Security Alarms which was also integrated into SCADA.
- Final Site grading and stabilization will be worked on the week of April 18th and as weather permits.
- Supervisors Guyer and Jaeger have started completing the Water Allocation Permit Application for DNREC that's required for authorization to use the well.

F. CPR Construction – 3 New Homes

- CPR Construction completed the house at 8 Meehan Avenue and there has been no activity on the 2 other proposed homes.

G. Delaware Street Wharf – New Pier

- The revised project bids were received by the City which were still over the original budget. Supervisor Guyer has had no further communication from the City on their plans to proceed based upon the new bids.

H. Battery Park Water Services

- Operators completed all water service improvements on Battery Park. There are now 5 metered locations throughout the park that can be utilized for events on the park. Assistant Supervisor Jaeger met with Trustees Castagno and Clayton to review the new water services on the park. They were pleased with the locations and requested the invoices for the work be forwarded.

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Water Department Commission Meeting Report

April 25, 2016

Prepared By: Jay Guyer on April 18, 2016

I. Corrosion Control Chemical Evaluation

1. Supervisor Guyer is following up with the Office of Drinking Water, Office of Engineering and several other utilities that use Zinc Orthophosphate for their corrosion control chemical to get their opinions on the product.

2. Operations

A. Outages, Reporting, and Regulations

1. There were no planned and unplanned water outages for the month of March. The outage report is attached.

B. Repairs and Maintenance

1. Water Operators have been performing routine maintenance on the curb boxes and valve boxes as needed.
2. Spring Hydrant Flushing is being scheduled for the week of April 25th.

C. Operation & Maintenance Budget, Capital Budget, and Grants

1. Supervisor Guyer continues to administer the FEMA Grants for security improvements at the Utility Building and Cross Roads Well. Per Mr. Arnold Maas of DEMA, the request for Change of Work Scope for replacing the camera system and recorder at the Utility Building and Storage Yard is under review. The April Sub-grant Progress Reports for both sites were updated and forwarded to Mr. Maas of DEMA. Supervisor Guyer will initiate the process to start close out of the Sub-grant for the Cross Roads well. A revised package of Security Instruments components and work at Cross Roads well was submitted requesting reimbursement.
2. Supervisor Guyer is reviewing the options for FY 2017 Homeland Security Grants and has met with Security Instruments about the camera system improvements at the main office and adding cameras at the School Lane Treatment Facility.
3. Supervisors Guyer and Jaeger completed the DRBC Water Report and submitted it to the Delaware River Basin Commission on March 28th.

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Water Department Commission Meeting Report

April 25, 2016

Prepared By: Jay Guyer on April 18, 2016

D. Utility Software Upgrade

1. MSC Representatives attended the Edmunds Software Users conference on April 6th in Dover to preview the software and network with other Utilities using the software. GM Patone is conducting further research on available software packages for Municipalities

E. Equipment

1. No equipment issues to report.

F. Perfluorinated Compounds – PFC Contamination

1. GM Patone continues working with the USDA in reference to the Grant.
2. Final site cleanup and grading will be worked on the week of April 18th and as weather permits. A materials list for fence supplies was sent to 3 suppliers and quotes are being received. The fence materials will be purchased and installed by MSC Operators.
3. Supervisor Guyer has been working with GM Patone, Patricia Malloy, and Dan Barbato of Pennoni Associates to finalize purchase orders, invoices, and inspection reports related to the carbon filtration project for the Grant Project Closeout Checklist.

G. Water Quality Testing

1. PFC Contamination – The next sampling will be completed in June 2016 per ODW requirements.
2. The first quarter monitoring for the VOC's in Basin Road Well were completed. The results illustrated the contaminant TCE was not detected in the raw water pre aeration sample, post carbon filtration, or the finished water. Supervisor Guyer contacted ODW about the contaminant not being present in the BR Well supply and will schedule follow up sampling.
3. MSC started our first round of Lead and Copper monitoring the week of March 21st. 40 samples were collected and delivered to Eurofins/QC Laboratory for analysis. First round sampling is complete and test results are being input into a data spreadsheet. Supervisor Guyer and Assistant Supervisor Jaeger will finish reviewing the test results and forward to the Office of Drinking Water. Copper was non detect in all 40 samples and lead was non-detect in 38 samples with 2 samples having results of 3.2 ppb and 3.4 ppb, both below the US EPA action level of 15 ppb based upon the 90th percentile.

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Water Department Commission Meeting Report

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Prepared By: Jay Guyer on April 18, 2016

H. Personnel

1. Water operators are registered for continuing education courses to maintain their required credit hours for their licenses.

3. Reporting Agencies

A. WSCC - Water Supply Coordinating Council

1. The next meeting is scheduled for May 19, 2016.

B. WRA – Water Resource Agency

1. Supervisor Guyer started sending weekly pumping data to Jerry Kauffman of University of Delaware Water Resource Agency (WRA).

C. DEWARN – Delaware Water/Wastewater Agency Response Network

1. The April 14th DEWARN meeting went well. Officers for 2016 are Rob Penman - Chair, Jay Guyer – Vice Chair, and Tom Coleman, Secretary. The date of the next meeting is September 15, 2016.

D. Water Operator Advisory Council Meeting

1. The date of the next meeting is pending, tentatively May 12, 2016.

End of Report

Attachments: March 2016 Water Works Report
March 2016 Water Outage Tracking Sheet

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Monthly Water Outages / Interruptions Report

March 1 - 31, 2016

Prepared By: Jay Guyer on April 18, 2016

Planned Outage / Interruptions		
	Approximate Duration	No. of Customers
Date	Hours / Minutes	Location

Comments

No Planned Outages for the Month of March 2016.

Unplanned Outage / Interruptions		
	Approximate Duration	No. of Customers
Date	Hours / Minutes	Location

Comments

No Unplanned Outages for the Month of March 2016.

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Monthly Water Works Report

March 1 - 31, 2016

Prepared By: Jay Guyer on April 18, 2016

Water Production		Raw	Finished	Gallons	
Month	Year	Total Gallons	Total Gallons	Raw	Finished
March	2015	14,129,000	14,751,800	11,959,700	12,317,800
March	2016	11,959,700	12,317,800	12,317,800	358,100
	Difference	-2,169,300	-2,434,000		
	Percentage Difference	-18.1	-19.8		2.9

Well(s) in Operation	School Lane	Frenchtown Road	Basin Road
Days Pumped	XXX 3	XXX 29	XXX 3

Water Quality	MSC Average	Goal	Range
Average Chlorine Residual	1.00 ppm	1.00 ppm	0.90 - 1.20 ppm
Average pH	7.5	7.6	7.4 - 7.8
Average Fluoride Residual	0.82 ppm	1.00 ppm	0.80 - 1.20 ppm

General Water System Report

Routine Bacteria Sampling
 (Office of Drinking Water)

Collected Results
 10
 10 Absent
 0 Present

Miss Utility Locate Requests
 (Water and Electric Locates)

Received
 # Completed
 # of Damages
 71
 71
 0

Building Permit Review
 (Water Related Conflicts)

Reviewed
 # Approved
 # Not Approved
 31
 31
 0