



Bristol Harbour Village Association
30 Golfside Circle
Canandaigua, NY 14424

September 8, 2020

Michelle L. Phillips, Secretary to the Commission
NYS Department of Public Service
Three Empire State Plaza, 20th Floor
Albany, NY 12223

Dear Secretary Phillips,

The Bristol Harbour Village Association, comprised of 363 homes in South Bristol, New York, gets its domestic water from the Bristol Water Works Corporation ("BWWC") and has recently been put on notice for a request of temporary rate relief, an imminent rate increase and termination of domestic water delivery failing the requested rate increase. The Bristol Harbour Village Association objects to this rate request based upon the substantial and unconscionable increase in the rate requested of 104.1%, and on the fact and knowledge that BWWC is a service component of the larger amenities and services owned by sponsor/developer within the planned unit development.

A filing by BWWC on August 21, 2020 sought authorization from your office to increase BWWC's residential water rates by 104.1%. While BWWC states in its letter that it has incurred significant operating losses in the past three years, totaling approximately \$94,000 (in 2017), \$50,000 (in 2018) and \$41,000 (in 2019), the ownership fails to mention its other high value development components to which water and sewer operations are fundamentally attached. BWWC was created to provide domestic water to the association as a component of a significantly larger composite package of amenities and services. As a subsidiary of a larger development enterprise within our planned unit development, BWWC's actual economic viability is tied to a championship golf course, a lodge and until recently a 37-room hotel and 164 boat slips on the lakefront. The hotel, identified in their notice to the PSC as their "significant" commercial customer, was recently renovated but closed for business in the Fall of 2019, and razed in August 2020 by the ownership itself. In 2016 the current ownership divested the profitable 164 boat slip rental operation to its contractor. Within a month of closing the golf course to the public this summer, the ownership also abandoned their ambition to develop a significant hotel and spa named Everwilde on an adjacent 46 acre parcel for which they purchased the BWWC.

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The hardship the BWWC seeks to remedy through the rate increase is tangential to the ownership's greater business enterprise and its business decisions, whether it be growth or contraction. The development utility originated to competitively service the homeowners in perpetuity must meet its financial goals without substantial and material impact on the homeowners who rely on consistent rates and manageable increases. The notice of termination failing an increase is so significant that we ask the PSC for guidance and assistance on ensuring reliable, consistent and uninterrupted service.

In the case of closure or potential interruption of service, we request that the PSC possibly seek the consolidation of the BWWC with a larger public water utility. Given the hardship stated, we also request confirmation that the maintenance and operations meet all state and local requirements including the appropriate certification of its staff.

Please direct all communications to: Laura Halleran, Board Secretary
c/o BHVA
30 Golfside Circle, 14424
Email: Lhalleran.bhva@gmail.com
Tel: (585) 737-6896

Thank you for your consideration.

The Board of Directors,
Bristol Harbour Village Association