

EXHIBIT 2

SPIC Response to UTC Staff Data Request 20

Revenues and Customers for 2011

Average Annual Revenue per Customer

UTC STAFF DATA REQUEST NO. 20:

On June 8, 2012, Sandy Point Improvement Company provided to Commission Staff a calculation of the average annual revenue per customer, separated by Class A shareholders, Class C shareholders and non-shareholders. A copy is attached. Please tie the total revenue to revenues contained in the annual report for Sandy Point Improvement Company for the most recent fiscal year. Please confirm that calculation is currently accurate, and if you cannot confirm, please update the calculation for the most recent information available.

RESPONSE:

Prior to the initiation of this proceeding, on May 10, 2012, Commission Staff sent a data request to Sandy Point requesting Sandy Point provide a detail of the average annual revenue per customer by shareholder class for 2011. On June 8, 2012, Sandy Point provided Commission Staff a detailed calculation of the average annual revenue per customer, separated by Class A shareholders, Class C shareholders and non-shareholders for the calendar year 2011, as requested. Please see a copy of the summary sheets included in Sandy Point's responses on June 8, 2012, produced here in the attached documents produced in response to Data Request No. 20. An excerpt from one of summary sheets, as included in the UTC Staff's Data Requests to the Company, provides as follows:

Average 2011 Service and Usage Billings By Shareholder Type			
	Revenue	Number of Shareholders	Average Revenue Per Shareholder
Class A	\$262,127.18	779	\$336.49
Class C	\$44,807.34	119	\$376.53
Non-Shareholder	\$20,779.77	46	\$451.73
Total Revenue	\$327,714.29	944	\$347.15

Weighted Average 2011 Service and Usage Billings By Shareholder Type			
	Revenue	Total Billing Cycles	Weighted AVG Revenue Per Shareholder
Class A	\$262,127.18	4662	\$337.36
Class C	\$44,807.34	711	\$378.12
Non-Shareholder	\$20,779.77	276	\$451.73
Total Revenue	\$327,714.29	5649	\$348.08

This Data Request No. 20 purports to request Sandy Point to tie the total revenue to revenues contained in the annual report for Sandy Point Improvement Company for the most recent fiscal year. Sandy Point does not produce an annual report. In response to Data Request No. 14, Sandy Point explained that it does not prepare or have prepared an annual report, but Sandy Point did produce, in the interest of cooperation, its Financial Statement and Independent Accountant's Compilation Report for the fiscal year ending March 31, 2012, prepared by Larson Gross, Certified Public Accountants.

As set forth above, the 2011 service and usage billings by shareholder type indicated total water service revenue of \$327,714.29 across all shareholder and customer types.

As set forth in the financial statement included in the documents produced in response to Data Request No. 14, the financial statement for the fiscal year ending March 31, 2012 indicated an annual water service and fees revenue of \$329,115 across all shareholder and customer types.

The \$327,714.29 indicated in the data provided June 8, 2012 was based on revenue for the calendar year 2011 (January 1, 2011 through December 31, 2011). The \$329,115 indicated in the financial statement is based on revenue for the fiscal year ending March 31, 2012 (April 1, 2011 through March 31, 2012). These revenue figures both represent 12-month periods with an overlap of nine of 12 months. The total revenue difference between the two amounts is \$1,400.71.

Witnesses knowledgeable about and who can respond to questions concerning the response may include those witnesses identified in response to Data Request No. 21.5, individuals identified in the responses provided and documents produced, and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: February 1, 2013

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Average 2011 Reserve Fund Surcharges By Shareholder Type

	Revenue	Number of Shareholders	Average Surcharge Per Shareholder
Class A	\$ 15,580.00	778	\$ 20.03
Class C	\$ 2,380.00	119	\$ 20.00
Non-Shareholder	\$ 920.00	46	\$ 20.00
Total Revenue	\$ 18,880.00	943	\$ 20.02

Average 2011 Service and Usage Billings By Shareholder Type METERED Customers

	Revenue	Number of Shareholders	Average Revenue Per Shareholder
Class A	\$ 213,258.36	595 \$	358.42
Class C	\$ 41,541.34	107 \$	388.24
Non-Shareholder	\$ 20,227.77	44 \$	459.72
Total Revenue	\$ 275,027.47	746 \$	368.67

Average 2011 Service and Usage Billings By Shareholder Type NON-METERED Customers

	Revenue	Number of Shareholders	Average Revenue Per Shareholder
Class A	\$ 48,868.82	184 \$	265.59
Class C	\$ 3,266.00	12 \$	272.17
Non-Shareholder	\$ 552.00	2 \$	276.00
Total Revenue	\$ 52,686.82	198 \$	266.10

Average 2011 Reserve Fund Surcharges By Shareholder Type METERED Customers

	Revenue	Number of Shareholders	Average Surcharge Per Shareholder
Class A	\$ 12,020.00	594 \$	20.24
Class C	\$ 2,140.00	107 \$	20.00
Non-Shareholder	\$ 880.00	44 \$	20.00
Total Revenue	\$ 15,040.00	745 \$	20.19

Average 2011 Reserve Fund Surcharges By Shareholder Type NON-METERED Customers

	Revenue	Number of Shareholders	Average Surcharge Per Shareholder
Class A	\$ 3,560.00	184 \$	19.35
Class C	\$ 240.00	12 \$	20.00
Non-Shareholder	\$ 40.00	2 \$	20.00
Total Revenue	\$ 3,840.00	198 \$	19.39