

**BEFORE THE
PUBLIC UTILITIES COMMISSION
OF RHODE ISLAND**

**UNITED WATER OF)
RHODE ISLAND, INC.) DOCKET NO. 4255**

**DIRECT TESTIMONY
OF
THOMAS S. CATLIN**

**ON BEHALF OF THE
DIVISION OF PUBLIC UTILITIES AND CARRIERS**

SEPTEMBER 30, 2011

EXETER

ASSOCIATES, INC.
10480 Little Patuxent Parkway
Suite 300
Columbia, Maryland 20904

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| | | |
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| UNITED WATER OF |) | |
| RHODE ISLAND, INC. |) | DOCKET NO. 4255 |

Direct Testimony of Thomas S. Catlin

1 **Introduction**

2 Q. WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS
3 ADDRESS?

4 A. My name is Thomas S. Catlin. I am a principal with Exeter Associates, Inc. Our
5 offices are located at 10480 Little Patuxent Parkway, Suite 300, Columbia, Maryland
6 21044. Exeter is a firm of consulting economists specializing in issues pertaining to
7 public utilities.

8 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

9 A. I hold a Master of Science Degree in Water Resources Engineering and Management
10 from Arizona State University (1976). Major areas of study for this degree included
11 pricing policy, economics, and management. I received my Bachelor of Science
12 Degree in Physics and Math from the State University of New York at Stony Brook
13 in 1974. I have also completed graduate courses in financial and management
14 accounting.

15 Q. WOULD YOU PLEASE DESCRIBE YOUR PROFESSIONAL
16 EXPERIENCE?

17 A. From August 1976 until June 1977, I was employed by Arthur Beard Engineers in
18 Phoenix, Arizona, where, among other responsibilities, I conducted economic
19 feasibility, financial and implementation analyses in conjunction with utility

1 construction projects. I also served as project engineer for two utility valuation
2 studies.

3 From June 1977 until September 1981, I was employed by Camp Dresser &
4 McKee, Inc. Prior to transferring to the Management Consulting Division of CDM in
5 April 1978, I was involved in both project administration and design. My project
6 administration responsibilities included budget preparation and labor and cost
7 monitoring and forecasting. As a member of CDM's Management Consulting
8 Division, I performed cost of service, rate, and financial studies on approximately
9 15 municipal and private water, wastewater and storm drainage utilities. These
10 projects included: determining total costs of service; developing capital asset and
11 depreciation bases; preparing cost allocation studies; evaluating alternative rate
12 structures and designing rates; preparing bill analyses; developing cost and revenue
13 projections; and preparing rate filings and expert testimony.

14 In September 1981, I accepted a position as a utility rates analyst with Exeter
15 Associates, Inc. I became a principal and vice-president of the firm in 1984. Since
16 joining Exeter, I have continued to be involved in the analysis of the operations of
17 public utilities, with particular emphasis on utility rate regulation. I have been
18 extensively involved in the review and analysis of utility rate filings, as well as other
19 types of proceedings before state and federal regulatory authorities. My work in
20 utility rate filings has focused on revenue requirements issues, but has also addressed
21 service cost and rate design matters. I have also been involved in analyzing affiliate
22 relations, alternative regulatory mechanisms, and regulatory restructuring issues.
23 This experience has involved electric, natural gas transmission and distribution, and
24 telephone utilities, as well as water and wastewater companies.

1 Q. HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY
2 PROCEEDINGS ON UTILITY RATES?

3 A. Yes. I have previously presented testimony on more than 250 occasions before the
4 Federal Energy Regulatory Commission and the public utility commissions of
5 Arizona, California, Colorado, Delaware, the District of Columbia, Florida, Idaho,
6 Illinois, Indiana, Kentucky, Louisiana, Maine, Maryland, Montana, Nevada, New
7 Jersey, Ohio, Oklahoma, Pennsylvania, Utah, Virginia and West Virginia, as well as
8 before this Commission. I have also filed rate case evidence by affidavit with the
9 Connecticut Department of Public Utility Control and have appeared as a witness on
10 behalf of the Louisiana Public Service Commission before the Nineteenth Judicial
11 District Court.

12 Q. ARE YOU A MEMBER OF ANY PROFESSIONAL SOCIETIES?

13 A. Yes. I am a member of the American Water Works Association (AWWA) and the
14 Chesapeake Section of the AWWA. I serve on the AWWA's Rates and Charges
15 Committee and on the AWWA Water Utility Council's Technical Advisory Group on
16 Economics.

17 Q. ON WHOSE BEHALF ARE YOU APPEARING?

18 A. I am presenting testimony on behalf of the Division of Public Utilities and Carriers
19 (the Division).

20 Q. HAVE YOU PREVIOUSLY TESTIFIED ON WATER UTILITY ISSUES
21 BEFORE THIS COMMISSION?

22 A. Yes, I have been asked by the Division to address water utility issues on numerous
23 occasions. I testified on revenue requirement, cost of service and/or rate design
24 issues in Newport Water Division, Docket Nos. 2029, 2985, 3457, 3578, 3675, 3818
25 4025 and 4243; Providence Water Supply Board, Docket Nos. 2022, 2048, 2304,

1 2961, 3163, 3446, 3684, 3832 and 4061; Kent County Water Authority, Docket Nos.
2 2098 and 3942, Woonsocket Water Department, Docket Nos. 2099 and 2904; United
3 Water Rhode Island, Inc., (formerly Wakefield Water Company), Docket Nos. 2006
4 and 2873; and Pawtucket Water Supply Board, Docket Nos. 3193, 3378, 3497, 3674
5 and 4171.

6

7

Purpose and Summary

8 Q.

WHAT IS THE PURPOSE OF YOUR TESTIMONY?

9 A.

Exeter Associates was retained by the Division to assist it in the evaluation of the rate filing submitted by the United Water of Rhode Island, Inc. (United or the Company) on June 3, 2011. This testimony presents my findings and recommendations with regard to United's rate year rate base and net operating income at present rates. Based on these amounts, I have determined the overall revenue increase that would be required to generate the return on rate base recommended by Mr. Matthew I. Kahal on behalf of the Division. My associate, Mr. Jerome D. Mierzwa addresses cost allocation and rate design on behalf of the Division.

16

17 Q.

HAVE YOU PREPARED SCHEDULES TO ACCOMPANY YOUR
18 TESTIMONY?

19 A.

Yes. I have prepared Schedules TSC-1 through TSC-15, which are attached to my testimony. These schedules present my findings regarding United's rate year revenue requirements.

21

22 Q.

WHAT TIME PERIODS HAVE YOU UTILIZED IN MAKING YOUR
23 DETERMINATION OF UNITED'S REVENUE REQUIREMENTS?

24 A.

Consistent with United's filing, I have accepted the 12 months ending December 31, 2010 as the test year. I have also accepted the 12 months ending December 31, 2012

25

1 as the rate year for purposes of determining the Company's revenue requirements and
2 the revenue increase necessary to recover those requirements.

3 Q. WHAT IS YOUR RECOMMENDATION WITH REGARD TO THE
4 APPROPRIATE INCREASE IN REVENUES IN THIS PROCEEDING?

5 A. As shown on Schedule TSC-1, it is my recommendation that United receive a revenue
6 increase of \$896,196 in this proceeding. This amount is \$322,506 less than the
7 increase of \$1,218,702 that United has requested based on rate year revenues at
8 present rates.

9 Q. PLEASE SUMMARIZE YOUR FINDINGS REGARDING THE
10 COMPANY'S REVENUE REQUIREMENTS.

11 A. As shown on Schedule TSC-1, I have determined the Company has a revenue
12 deficiency of \$896,196. This is the amount by which revenues at present rates are
13 less than those required to generate an overall return of 7.58 percent after reflecting
14 my adjustments to United's claimed rate year rate base and operating income. The
15 return of 7.58 percent represents Mr. Kahal's findings regarding the Company's
16 overall cost of capital.

17 Schedule TSC-2 summarizes my adjustments to United's proposed rate year
18 rate base. Schedule TSC-3 provides a summary of my adjustments to rate year
19 revenues and expenses and the resulting net income at present rates. Schedule TSC-4
20 presents a proof of income taxes at present and proposed rates.

21 Q. HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?

22 A. In the remainder of my testimony, I document and explain each of the adjustments to
23 rate base and operating income which I have made to arrive at the test year revenue
24 surplus shown on Schedule TSC-1. My discussion of these adjustments is organized

1 into sections corresponding to the issue being addressed. These sections are set forth
2 in the Table of Contents for this testimony.

3

4

Indian Lake Shore Plant

5 Q. PLEASE EXPLAIN YOUR ADJUSTMENT TO PLANT IN SERVICE
6 RELATED TO THE INDIAN LAKE SHORE DEVELOPMENT.

7 A. In March 2012, the transmission main that services the Indian Lake Shore
8 Development is scheduled to be turned over to United as a contributed asset. In its
9 filing, the Company included \$198,000 in contributions in-aid-of construction, but
10 failed to include the \$198,000 cost of the main in plant in service. As shown on the
11 rate base summary provided on Schedule TSC-2, I have increased plant in service by
12 \$198,000 to include this investment.

13

14

Materials and Supplies

15 Q. WHAT ADJUSTMENT ARE YOU PROPOSING TO THE BALANCE OF
16 MATERIALS AND SUPPLIES?

17 A. In its filing, United assumed that the balance of materials and supplies would remain
18 at its historical 13-month average balance of \$103,664 that existed during the 2010
19 test year. However, since mid-2010, the balance of materials and supplies has
20 declined. To reflect this decline and more accurately reflect known investment levels,
21 I am proposing to update that balance of materials and supplies to reflect the most
22 recent 13-month average balance available. As shown on Schedule TSC-5, this
23 adjustment reduces the average balance of materials and supplies by \$15,575.

Cash Working Capital

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Q. HOW HAS UNITED CALCULATED ITS CLAIMED ALLOWANCE FOR CASH WORKING CAPITAL?

A. The Company has calculated its claimed cash working capital allowance as one-eighth (1/8th) of operating and maintenance (O&M) expense.

Q. WHAT ADJUSTMENTS ARE YOU PROPOSING TO MAKE TO UNITED'S CLAIM?

A. I am proposing to make two adjustments to United's claim. First, I have eliminated tank painting amortization expense from the expense base used in the calculation of cash working capital. United records the amortization of deferred painting costs as O&M expense. However, given that the balance of deferred costs is recorded as a regulatory asset and included in rate base, the amortization should be treated like all other depreciation and amortization expenses and not included in the calculation of cash working capital. Second, I have adjusted the O&M base to which the one-eighth factor is applied to reflect the adjustments to O&M expense that I have made on behalf of the Division.

Q. HAVE YOU PREPARED A SCHEDULE SHOWING YOUR ADJUSTED CASH WORKING CAPITAL ALLOWANCE?

A. Yes, Schedule TSC-6 presents my calculation of the Division's recommended allowance for cash working capital based on the one-eighth method. As shown there, I have calculated a cash working capital allowance of \$219,609, which is \$15,419 less than amount included in United's filing.

Deferred Tank Painting Expense

1
2 Q. WHAT CLAIM HAS UNITED MADE FOR DEFERRED TANK PAINTING
3 COSTS?

4 A. United has three water tanks – the Howland Aerator Tank, the Sherman Tank and the
5 Boston Neck Tank – that require painting every 10 or so years. The Sherman and
6 Howland Aerator tanks were painted in 2008 and the Boston Neck Tank is scheduled
7 to be painted in 2012. United is proposing to include the amortization of the costs of
8 painting of all three tanks over 10 years in rate year expense. In addition, the
9 Company has included the unamortized balance of the tank painting costs net of
10 deferred taxes in rate base. (For income tax purposes, tank painting costs can be
11 expensed when incurred, thereby creating deferred income taxes when the costs are
12 deferred for ratemaking purposes.)

13 Q. WHAT CONCERN DO YOU HAVE WITH THE COMPANY’S CLAIM?

14 A. The balance of deferred tank painting costs claimed by the Company assumes that the
15 amortizations of the costs of painting the Sherman and Howland Aerator tanks that
16 took place in 2008 does not begin until February 1, 2012.

17 Q. IS THIS APPROPRIATE?

18 A. No. The amortization of tank painting costs should begin when the painting is
19 completed and should take place over the interval between tank paintings – ten years
20 in this case. It is inappropriate to postpone the start of the amortization for almost
21 four years. While tank painting costs are technically an expense, not a capital cost, if
22 the costs are to be deferred and amortized, then amortization should begin when the
23 tank is placed back in service just as the depreciation or amortization of a capital
24 addition begins when the project is placed in service.

1 Q. IF TANK PAINTING COSTS ARE TECHNICALLY AN EXPENSE, DID
2 UNITED REQUEST COMMISSION APPROVAL TO BE ALLOWED TO
3 DEFER AND AMORTIZE THE COSTS?

4 A. No. United did not request approval to be allowed to defer and amortize the costs or
5 to be allowed to postpone amortization until some future date when it filed a rate
6 case. I have accepted the deferral of the costs because doing so is common practice.
7 However, as discussed above, amortization should have begun when the painting was
8 completed.

9 Q. WHAT REASON DID THE COMPANY PROVIDE FOR NOT
10 BEGINNING THE AMORTIZATION OF THE 2008 COSTS OF
11 PAINTING THE HOWLAND AERATOR AND SHERMAN TANKS
12 UNTIL FEBRUARY 1, 2012?

13 A. According to the response to Div. 2-9, the Company delayed the amortization to
14 match the amortization with recovery from ratepayers. However, this rationale fails
15 to recognize that an allowance for tank painting amortization was already included in
16 rates. In the Company's 1999 rate case in Docket No. 2873, the rate year cost of
17 service reflected the ongoing amortization of tank painting costs incurred in prior
18 years. Since no adjustment was made to remove the amortization of those costs when
19 it was completed in early 2003, matching tank painting amortization with rate
20 recovery is not a basis for postponing the amortization of tank painting costs incurred
21 in 2008.

22 Q. WHAT ADJUSTMENT ARE YOU PROPOSING?

23 A. I am proposing to adjust the balance of deferred tank painting costs included in rate
24 base to reflect the amortization of the costs of the Howland Aerator and Sherman
25 Tanks beginning in 2008. The painting of both tanks was completed in April 2008.

1 Therefore, I have accounted for the 45 months of additional amortization from May
2 2008 up to February 2012 when United assumed amortization would begin.
3 As shown on Schedule TSC-7, this adjustment reduces the unamortized balance of
4 deferred tank painting costs by \$88,401. After accounting for the associated
5 reduction in accumulated deferred income taxes, the net reduction in rate base is
6 \$57,461.

7

8

Deferred Rate Case Expense

9 Q. PLEASE EXPLAIN YOUR ADJUSTMENT TO ELIMINATE DEFERRED
10 RATE CASE EXPENSE FROM RATE YEAR EXPENSES.

11 A. United is proposing to amortize its projected rate case expense in this proceeding over
12 three years and has included the projected average balance of unamortized rate case
13 expense during the 2012 rate year in rate base. Consistent with this Commission's
14 long-standing practice, as affirmed by the Rhode Island Supreme Court in Providence
15 Gas Company v. Malachowski (656 A 2d. 949 at 953 (R.I. 1995)), I have eliminated
16 the balance of deferred rate case expenses from rate base. As shown on my rate base
17 summary schedule (TSC-7), this adjustment reduces rate base by \$272,756. I address
18 the amortization of rate case expense subsequently.

19 Q. DO YOU HAVE ANY OTHER COMMENTS WITH REGARD TO
20 DEFERRED RATE CASE EXPENSE?

21 A. Yes. Like tank painting costs, rate case expenses are deductible for income tax
22 purposes when incurred. Accordingly, if unamortized rate case costs were to be
23 included in rate base, the amount should be stated on a net of tax basis.

1 **Accumulated Deferred Income Taxes**

2 Q. WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO THE
3 BALANCE OF ACCUMULATED DEFERRED INCOME TAXES?

4 A. In developing its projection of the balance of accumulated deferred income taxes
5 (ADIT) in the rate year, the Company did not take into account the provision for
6 federal bonus depreciation of 100 percent in 2011 and 50 percent in 2012. As a
7 result, United's projected rate year ADIT balance is understated. I have adjusted the
8 projected balance of ADIT for the rate year to take federal bonus depreciation into
9 account. As shown on Schedule TSC-8, this adjustment increases the balance of
10 ADIT and reduces rate base by \$44,972.

11
12 **Incentive Compensation**

13 Q. PLEASE SUMMARIZE UNITED'S CLAIM FOR INCENTIVE
14 COMPENSATION EXPENSE.

15 A. As shown on Exhibit 4 (Lippai), Schedule 2A, page 1 of 4, the Company's claimed
16 rate year payroll expense includes \$32,758 for incentive compensation, of which
17 78.91 percent is charged to O&M and 21.09 percent is capitalized. This amount is
18 based on all employees receiving their targeted bonus payments under the Company's
19 Short Term Incentive Plan (STIP). For exempt employees, these target payments
20 range from five percent to 15 percent of their salaries and are based on achieving a
21 combination of financial and performance goals. However, no bonuses are paid if the
22 80 percent threshold for the financial goals is not achieved. For non-exempt
23 employees, the two percent award is determined by management.

24 Q. WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO
25 INCENTIVE COMPENSATION EXPENSE?

1 A. I am proposing two adjustments to the incentive compensation amounts included for
2 United's exempt employees. First, I have reduced the amounts included for the
3 Manager and Superintendent from the full targeted bonus levels of 15 percent and
4 10 percent to 12.45 percent and 7.55 percent, respectively, of their base salaries.
5 These lower percentages reflect the average bonus each employee received over the
6 last three years (2008 through 2010). Over that period, neither employee received the
7 full targeted bonus in any year. To be conservative, I have accepted the full five
8 percent target award for the Supervisor position because the employee in that position
9 was a new hire in 2010 and there is no historical data for that position.

10 The second adjustment I am making is to include only 60 percent of the over-
11 all bonuses for the Manager, Superintendent and Supervisor as an allowable expense
12 for ratemaking. This adjustment excludes the 40 percent of the incentive
13 compensation amounts that are directly associated with meeting financial goals.

14 Q. PLEASE EXPLAIN WHY YOU ARE PROPOSING TO ELIMINATE
15 40 PERCENT OF STIP EXPENSE FOR EXEMPT EMPLOYEES.

16 A. The portion of STIP expense that is directly attributable to meeting financial
17 performance goals is not properly recoverable from ratepayers for several reasons.
18 First, if the financial goals are set properly, achieving the necessary performance
19 should be self-supporting. That is, measures that achieve additional cost savings,
20 improve sales, or otherwise improve the financial results of the Company should
21 provide the income necessary to fund the awards. Second, the payouts are made
22 independent of the quality of service, efficiency or safety goals. Finally, the incentive
23 to improve financial performance is not necessarily consistent with ratepayers'
24 interests.

1 Q. WHAT IS THE EFFECT OF YOUR TWO ADJUSTMENTS TO THE
2 INCENTIVE COMPENSATION AMOUNTS INCLUDED IN RATES FOR
3 UNITED'S EXEMPT EMPLOYEES?

4 A. As shown on Schedule TSC-9, adjusting the incentive compensation expense
5 included in rates to reflect historical payment percentages and exclude the amounts
6 associated with achieving financial goals reduces rate year labor expense by \$10,332.
7 Accounting for the concomitant reduction in payroll taxes of \$790 results in a total
8 reduction in test year expenses of \$11,122.

9 Q. ARE YOU PROPOSING AN ADDITIONAL ADJUSTMENT TO THE
10 INCENTIVE COMPENSATION EXPENSE BILLED TO UNITED IN
11 BILLINGS FROM THE SERVICE COMPANY?

12 A. Yes. In addition to the amounts included in rate year expenses for United employees
13 in Rhode Island, Management and Service (M&S) fees billed to the Company by
14 United Water Management and Services (UWM&S) also include incentive
15 compensation paid to UWM&S employees. The amounts for UWM&S employees
16 include bonuses paid under three plans: the STIP, the Long-Term Incentive Plan
17 (LTIP) and the non-Exempt Bonus Plan. According to the response to Div. 8-1, rate
18 year M&S fees include \$26,000 for incentive compensation payments to UWM&S
19 employees. Of this total, \$17,000 represents amounts attributable to meeting
20 corporate financial goals. For the same reasons that I excluded incentive
21 compensation payments attributable to meeting financial goals for United's Rhode
22 Island employees, I am also proposing to eliminate those amounts paid to UWM&S
23 employees. As shown on Schedule TSC-10, this adjustment reduces M&S billings by
24 \$18,301 when the FICA taxes associated with the incentive compensation payments
25 are taken into account.

1 Q. ON WHAT BASIS ARE AWARDS UNDER THE LTIP AND NON-
2 EXEMPT BONUS PLANS AWARDED?

3 A. The LTIP applies only to United Water, Inc. employees in salary grades 22 through
4 24 (senior management employees) and all awards are based on financial
5 performance. The Non-Exempt Bonus Plan applies to all non-exempt employees and
6 the awards are based 50 percent on meeting financial performance and 50 percent on
7 meeting safety and customer service goals.

8

9 **Benefits Transferred Out**

10 Q. PLEASE EXPLAIN YOUR ADJUSTMENT OF BENEFITS
11 TRANSFERRED OUT.

12 A. In its filing, United has adjusted the test year fringe benefit capitalized or transferred
13 out to reflect rate year levels separately from its adjustment to bring test year benefits
14 expense to rate year levels. In response to Div. 6-5, the Company agreed that in
15 calculating rate year benefits transferred, it inadvertently omitted the rate year amount
16 for the OPEB transition obligation. As shown on Schedule TSC-11, including this
17 item increases benefits transferred out and reduces O&M expense by \$1,078.

18

19 **Medical Benefits Expense**

20 Q. WOULD YOU BRIEFLY SUMMARIZE HOW UNITED DEVELOPED
21 ITS PROJECTION OF MEDICAL BENEFITS EXPENSE FOR THE RATE
22 YEAR?

23 A. Yes. The Company's projection of rate year medical benefits expense is based on
24 estimates of the premiums for medical, dental and vision insurance and the number of
25 employees subscribing to the various types of coverage (employee, family, etc.).

1 For those employees who opted out of medical coverage, the Company has included a
2 medical waiver payment of \$1,000 annually.

3 Q. WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO UNITED'S
4 CLAIMED EXPENSE FOR MEDICAL BENEFITS?

5 A. In response to Div. 2-23, the Company indicated that corrections were necessary to its
6 filed estimate of medical benefits costs related to the number of employees
7 subscribing to the various types of coverage. Instead of two employees receiving
8 waiver payments for opting out of medical coverage, the correct number is three.
9 In addition, there are two less employees receiving medical coverage than originally
10 shown and one less employee receiving vision insurance. As shown on Schedule
11 TSC-12, the net effect of these changes is to reduce benefits expense by \$10,051
12 before accounting for the portion of benefits capitalized. Of this total, 21.09 percent
13 or \$2,120 is "transferred out" or capitalized for a net reduction in O&M expense of
14 \$7,931.

15

16 **Rate Case Expense Amortization**

17 Q. WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO THE
18 AMORTIZATION OF RATE CASE EXPENSE?

19 A. United has proposed to amortize the costs associated with this rate proceeding over
20 three years. I am proposing to extend the amortization period to five years. The use
21 of a five-year amortization period is conservative in light of the fact that the
22 Company's last rate case in Docket No. 2873 was in 1999 and the case prior to that
23 was in 1991 in Docket No. 2006. This represents an average interval between rate
24 cases of approximately 10 years.

25 Q. WHAT IS THE EFFECT OF THIS ADJUSTMENT ON RATE EXPENSES?

1 A. As shown on Schedule TSC-13, this adjustment reduces the rate case amortization
2 expense by \$42,733.

3

4 **Outside Services Expense**

5 Q. PLEASE EXPLAIN YOUR ADJUSTMENT TO OUTSIDE SERVICES
6 EXPENSE.

7 A. As part of the adjustment to outside services expense shown on Exhibit 4 (Lippai),
8 Schedule 15A, United increased Other Outside Service costs to reflect a three-year
9 average plus inflation. As shown in note (e) on that schedule, the costs recorded in
10 2009 and 2010 were both significantly less than in 2008. In response to Div. 2-35
11 and Div. 6-7 parts (1) and (2), United has indicated that Other Outside Services
12 includes the costs for Consumer Confidence Reports (CCR) that are undertaken every
13 year. However, in 2009 and 2010, the costs were recorded in a different account.
14 Accordingly, there is no need to adjust Other Outside Services to effectively include
15 costs that already included elsewhere in the rate year cost of service. Accordingly,
16 I have eliminated this adjustment, which reduces rate year expenses by \$4,403 as
17 shown on Schedule TSC-14.

18

19 **CIS Amortization**

20 Q. PLEASE SUMMARIZE THE COMPANY'S CLAIM RELATED TO A
21 NEW CUSTOMER INFORMATION SYSTEM.

22 A. United Water Resources, Inc. (United Corporation) is replacing its existing Customer
23 Information System (CIS) in 2011. The Company is seeking to include its allocated
24 share of the CIS investment in the amount of \$472,333 in rate base and is proposing
25 to amortize that investment over seven years.

1 Q. WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO UNITED'S
2 CLAIM?

3 A. I am proposing to adjust the amortization period for the new CIS from seven years to
4 ten years. As shown on Schedule TSC-15, this adjustment reduces CIS amortization
5 expense by \$20,243. In addition, it reduces the average rate year balance of
6 accumulated depreciation and amortization by \$14,358. After accounting for the
7 increase in ADIT due to the increase in the excess of tax over book depreciation, the
8 net increase in rate base is \$9,333.

9 Q. WHY ARE YOU RECOMMENDING THE USE OF A TEN-YEAR
10 AMORTIZATION PERIOD?

11 A. I believe that the seven-year amortization period proposed by United is unnecessarily
12 short. In two recent rate cases in which I was involved, the utilities had recently
13 installed totally new Customer Information Systems as a result of changes in
14 ownership.¹ Both of those utilities identified the expected lives of their new systems
15 to be ten years. While I have not conducted a detailed review, ten years is also
16 generally consistent with the service life uses CIS systems in other cases in which
17 I have participated. Accordingly, I am recommending the use of a ten-year
18 amortization for United's new CIS.

19 Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY

20 A. Yes it does.

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¹ The two cases were Peoples Natural Gas Company, LLC, Docket No. R-2010-2201702 before the Pennsylvania Public Utility Commission and Northern Utilities, Inc., Docket No. 2011-92 before the Maine Public Utilities Commission.

**BEFORE THE
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**SCHEDULES ACCOMPANYING THE
DIRECT TESTIMONY
OF
THOMAS S. CATLIN**

**ON BEHALF OF THE
DIVISION OF PUBLIC UTILITIES AND CARRIERS**

SEPTEMBER 30, 2011

EXETER

**ASSOCIATES, INC.
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Columbia, Maryland 20904**

UNITED WATER RHODE ISLAND, INC.

Summary of Operating Income
Rate Year Ended December 31, 2012

| | Amount per Company at Present Rates | Division Adjustments | Amount per Division at Present Rates | Revenue Increase/ (Decrease) | Amounts After Revenue Incr. / (Decr.) |
|-------------------------------|---|-------------------------|--|------------------------------------|---|
| <u>Operating Revenues</u> | | | | | |
| Metered Sales | \$ 2,569,432 | | \$ 2,569,432 | \$ 896,196 | \$ 3,465,628 |
| Fire Protection | 252,568 | | 252,568 | - | 252,568 |
| Other Operating Revenues | 36,302 | | 36,302 | | 36,302 |
| Total Operating Revenues | \$ 2,858,302 | \$ - | \$ 2,858,302 | \$ 896,196 | \$ 3,754,498 |
| <u>Operating Expenses</u> | | | | | |
| O&M Expense | \$ 1,877,083 | (84,778) | \$ 1,792,305 | 2,309 | \$ 1,794,613 |
| Depreciation Expense | 510,632 | (20,243) | 490,389 | - | 490,389 |
| Property Tax | 271,022 | | 271,022 | - | 271,022 |
| Payroll Rax | 56,446 | (790) | 55,656 | - | 55,656 |
| Gross Receipts Tax | 35,729 | - | 35,729 | 11,202 | 46,931 |
| Income before Income Taxes | \$ 107,390 | \$ 105,811 | \$ 213,201 | \$ 882,685 | \$ 1,095,886 |
| Current Income Taxes | (159,075) | 35,788 | (123,287) | 308,940 | 185,653 |
| Deferred Federal Income Taxes | 83,486 | 7,085 | 90,571 | | 90,571 |
| Amortization of ITCs | (4,668) | - | (4,668) | - | (4,668) |
| Total Operating Expenses | \$ 2,670,655 | \$ (62,939) | \$ 2,607,716 | \$ 322,451 | \$ 2,930,167 |
| Utility Operating Income | \$ 187,647 | \$ 62,939 | \$ 250,586 | \$ 573,745 | \$ 824,331 |
| Rate Base | \$ 11,073,931 | | \$ 10,875,081 | | \$ 10,875,081 |
| Rate of Return | 1.69% | | 2.30% | | 7.58% |

UNITED WATER RHODE ISLAND, INC.

Determination of Revenue Increase
 Rate Year Ended December 31, 2012

| | Amount per Company (1) | Amount Per Division | Amount per Division Source |
|---------------------------------------|---------------------------|------------------------|-------------------------------|
| Proposed Rate Base | 11,073,931 | \$ 10,875,081 | Schedule TSC-2 |
| Required Rate of Return | <u>8.74%</u> | <u>7.58%</u> | |
| Net Operating Income Required | \$ 967,862 | \$ 824,331 | |
| Net Operating Income at Present Rates | <u>187,647</u> | <u>250,586</u> | Schedule TSC-1, page 1 |
| Net Income Surplus/(Deficiency) | \$ (780,215) | \$ (573,745) | |
| Revenue Multiplier (2) | <u>1.5620102</u> | <u>1.5620102</u> | |
| Base Rate Revenue Increase | <u>\$ 1,218,703</u> | <u>\$ 896,196</u> | |

Verification

| | | | |
|-----------------------------|----------|---------------------|---------------------|
| Revenue Increase/(Decrease) | | \$ 1,218,703 | \$ 896,196 |
| PUC Assessment | 0.25759% | \$ 3,139 | \$ 2,309 |
| Gross Receipts Tax | 1.25% | <u>15,234</u> | <u>11,202</u> |
| Federal Taxable Income | | \$ 1,200,330 | \$ 882,685 |
| Federal Income Tax | 35.00% | <u>420,116</u> | <u>308,940</u> |
| Net Income | | <u>\$ (780,215)</u> | <u>\$ (573,745)</u> |

Notes:

(1) Per Exhibit 3 (Michaelson), Schedule 10.

| (2) Calculation of Conversion Factor | <u>Tax Rates</u> | |
|--------------------------------------|------------------|-----------------|
| Revenues | | 1.000000 |
| PUC Assessment | 0.25759% | 0.002576 |
| Gross Receipts Tax | 1.25% | <u>0.012500</u> |
| Net Federal Taxable Income | | 0.984924 |
| Federal Income Tax | 35.00% | <u>0.344723</u> |
| Revenue Conversion Factor | | 0.6402007 |
| Revenue Multiplier | | 1.56201025 |

UNITED WATER RHODE ISLAND, INC.

Summary of Rate Base
Rate Year Ended December 31, 2012

| <u>Description</u> | <u>Amount per Company (1)</u> | <u>Division Adjustments (2)</u> | <u>Adjusted Per Division</u> |
|---|-----------------------------------|-------------------------------------|----------------------------------|
| Utility Plant in Service | \$ 22,270,513 | \$ 198,000 | \$ 22,468,513 |
| Less: Accumulated Depreciation and Amortization | (6,213,068) | 14,358 | (6,198,710) |
| Net Utility Plant in Service | <u>\$ 16,057,445</u> | <u>\$ 212,358</u> | <u>\$ 16,269,803</u> |
| Materials and Supplies | 103,664 | (15,575) | 88,089 |
| Cash Working Capital | 235,028 | (15,419) | 219,609 |
| Deferred Tank Painting (net of Deferred Income Tax) | 147,639 | (57,461) | 90,178 |
| Deferred Rate Case Expense | 272,756 | (272,756) | - |
| Total Additions | <u>\$ 759,087</u> | <u>\$ (361,210)</u> | <u>\$ 397,877</u> |
| | - | - | - |
| Contributions in Aid of Construction | (3,596,531) | - | (3,596,531) |
| Accumulated Deferred Income Taxes | (1,534,287) | (49,997) | (1,584,284) |
| Unamortized ITCs | (98,414) | - | (98,414) |
| Unfunded FAS 106 (net of Deferred Income Tax) | (513,369) | - | (513,369) |
| Total Deductions | <u>\$ (5,742,601)</u> | <u>\$ (49,997)</u> | <u>\$ (5,792,598)</u> |
| Total Rate Base | <u><u>\$ 11,073,931</u></u> | <u><u>\$ (198,850)</u></u> | <u><u>\$ 10,875,081</u></u> |

Notes:

(1) Per Exhibit 3 (Michaelson), Schedule 1, page 4 of 4.

(2) Refer to page 2 of this Schedule.

UNITED WATER RHODE ISLAND, INC.

Summary of Adjustments to Rate Base
Rate Year Ended December 31, 2012

| | <u>Amount</u> | <u>Source</u> |
|-----------------------------------|-----------------------------|-----------------------------------|
| Rate Base per Company Filing | \$ 11,073,931 | Per Exhibit 3, Schedule 1, page 4 |
| <u>Division Adjustments</u> | | |
| Indian River Transmission Main | 198,000 | Response to Div. 2-30 |
| Materials and Supplies | (15,575) | Schedule TSC-5 |
| Cash Working Capital | (15,419) | Schedule TSC-6 |
| Deferred Tank Painting | (57,461) | Schedule TSC-7 |
| Deferred Rate Case | (272,756) | Refer to Testimony |
| Accumulated Deferred Income Taxes | (44,972) | Schedule TSC-8 |
| CIS Amortization Changes | 9,333 | Schedule TSC-15 |
| Total Division Adjustments | <u>\$ (198,850)</u> | |
| Division Adjusted Rate Base | <u><u>\$ 10,875,081</u></u> | |

UNITED WATER RHODE ISLAND, INC.

Summary of Adjustments to Net Income
Rate Year Ended December 31, 2012

| | <u>Amount</u> | <u>Source</u> |
|--|--------------------------|-------------------------------------|
| Net Income per Company | \$ 187,647 | Exhibit 3 (Michaelson), Schedule 10 |
| <u>Division Adjustments</u> | | |
| Incentive Compensation-Company Employees | 7,230 | Schedule TSC-9 |
| Incentive Compensation-UWM&S Fees | 11,895 | Schedule TSC-10 |
| Benefits Transferred Out | 701 | Schedule TSC-11 |
| Corrected Medical Benefits | 5,155 | Schedule TSC-12 |
| Rate Case Amortization | 27,776 | Schedule TSC-13 |
| Other Outside Services | 2,862 | Schedule TSC-14 |
| CIS Amortization | 13,158 | Schedule TSC-15 |
| Interest Synchronization | <u>(5,839)</u> | Schedule TSC-4 |
| Total Division Adjustments | <u>\$ 62,939</u> | |
| Net Income Per Division | <u><u>\$ 250,586</u></u> | |

UNITED WATER RHODE ISLAND, INC.

Summary of Adjustments to Net Income
Rate Year Ended December 31, 2012

| | <u>Revenues</u> | <u>O&M Expenses</u> | <u>Depreciation Expense</u> | <u>Taxes Other Than Oincome</u> | <u>Current Federal Income Taxes</u> | <u>Deferred Federal Income Taxes</u> | <u>ITC Amortization</u> | <u>Net Operating Income</u> |
|--|---------------------|-----------------------------|---------------------------------|---|---|--|-----------------------------|-------------------------------------|
| Net Income per Company | \$ 2,858,302 | \$ 1,877,083 | \$ 510,632 | \$ 363,197 | \$ (159,075) | \$ 83,486 | \$ (4,668) | \$ 187,647 |
| <u>Division Adjustments</u> | | | | | | | | |
| Incentive Compensation-Company Employees | | (10,332) | | (790) | 3,893 | - | - | 7,230 |
| Incentive Compensation-UWM&S Fees | | (18,301) | | | 6,405 | - | - | 11,895 |
| Benefits Transferred Out | | (1,078) | | | 377 | - | - | 701 |
| Corrected Medical Benefits | | (7,931) | | | 2,776 | - | - | 5,155 |
| Rate Case Amortization | | (42,733) | | | 14,957 | - | - | 27,776 |
| Other Outside Services | | (4,403) | | | 1,541 | - | - | 2,862 |
| CIS Amortization | | | (20,243) | | 7,085 | - | - | 13,158 |
| Interest Synchronization | | | | | 5,839 | | | (5,839) |
| Total Division Adjustments | \$ - | \$ (84,778) | \$ (20,243) | \$ (790) | \$ 42,873 | \$ - | \$ - | \$ 62,939 |
| Division Adjusted Net Income | <u>\$ 2,858,302</u> | <u>\$ 1,792,305</u> | <u>\$ 490,389</u> | <u>\$ 362,406</u> | <u>\$ (116,202)</u> | <u>\$ 83,486</u> | <u>\$ (4,668)</u> | <u>\$ 250,586</u> |

UNITED WATER RHODE ISLAND, INC.

Calculation of Current Income Tax
Rate Year Ended December 31, 2012

| | Amount per Company at Present Rates (A) | Division Adjustments (B) | Adjusted per Division at Present Rates (C) | Revenue Increase/ (Decrease) (D) | Amounts After Revenue Increase (E) |
|--------------------------------------|--|--------------------------------|---|---|---|
| Operating Revenue | \$ 2,858,302 | \$ - | \$ 2,858,302 | \$ 896,196 | \$ 3,754,498 |
| O&M Expense | 1,877,083 | (84,778) | 1,792,305 | 2,309 | 1,794,613 |
| Depreciation Expense | 510,632 | (20,243) | 490,389 | - | 490,389 |
| Property Tax | 271,022 | - | 271,022 | - | 271,022 |
| Payroll Tax | 56,446 | (790) | 55,656 | - | 55,656 |
| Gross Receipts Tax | 35,729 | - | 35,729 | 11,202 | 46,931 |
| Operating Income Before Income Taxes | \$ 107,390 | \$ 105,811 | \$ 213,201 | \$ 882,685 | \$ 1,095,886 |
| Interest Expense | 323,359 | (16,682) | 306,677 | - | 306,677 |
| Excess Tax Depreciation | 238,531 | 20,243 | 258,774 | - | 258,774 |
| Current Federal Taxable Income | (454,500) | 102,251 | (352,249) | 882,685 | 530,436 |
| Federal Income Tax at 35% | \$ (159,075) | \$ 35,788 | \$ (123,287) | \$ 308,940 | \$ 185,653 |
| Deferred Federal Income Tax | 83,486 | 7,085 | 90,571 | - | 90,571 |
| Investment Tax Credit Amortization | (4,668) | - | (4,668) | - | (4,668) |
| Total Federal Income Tax | \$ (80,257) | \$ 42,873 | \$ (37,384) | \$ 308,940 | \$ 271,555 |

Notes:

(1) Calculation of Interest Deduction

| | | | | |
|-------------------------------------|---------------|-------------|---------------|---------------|
| Rate Base | \$ 11,073,931 | | \$ 10,875,081 | \$ 10,875,081 |
| Weighted Cost of Debt | 2.92% | | 2.82% | 2.82% |
| Interest Deduction | \$ 323,359 | \$ (16,682) | \$ 306,677 | \$ 306,677 |
| Federal Income Tax Effect at 35% | | - | 5,839 | |
| Interest Synchronization Adjustment | | \$ 5,839 | | |

UNITED WATER RHODE ISLAND, INC.

Adjustment to Materials and Supplies to
Reflect Most Recent 13 Month Average Balance
Rate Year Ended December 31, 2012

| | <u>Balance (1)</u> |
|---|---------------------------|
| August | \$ 101,586 |
| September | 101,027 |
| October | 108,169 |
| November | 85,305 |
| December | 86,030 |
| January 2011 | 77,218 |
| February | 92,724 |
| March | 87,121 |
| April | 84,078 |
| May | 83,025 |
| June | 75,377 |
| July | 83,889 |
| August | <u>79,871</u> |
| | |
| Average Balance | \$ 88,109 |
| | |
| Balance per Company | <u>103,684</u> |
| | |
| Adjustment to Balance of Materials & Supplies | <u><u>\$ (15,575)</u></u> |

Note:

(1) Per Exhibit 3 (Michaelson), Schedule 1 and the response to Div. 2-3.

UNITED WATER RHODE ISLAND, INC.

Cash Working Capital Analysis
Rate Year Ended December 31, 2012

| | <u>Expense Amount</u> | <u>Working Capital</u> |
|--|---------------------------|----------------------------|
| O&M Expense per Company (1) | 1,880,222 | 235,028 |
| Division Adjustments (2) | | |
| Exclude Tank Painting Amortization | (38,574) | (4,822) |
| Incentive Compensation-Company Employees | (10,332) | (1,292) |
| Incentive Compensation-UWM&S Fees | (18,301) | (2,288) |
| Benefits Transferred Out | (1,078) | (135) |
| Corrected Medical Benefits | (7,931) | (991) |
| Rate Case Amortization | (42,733) | (5,342) |
| Other Outside Services | (4,403) | (550) |
| | | <u>(15,419)</u> |
| Adjustment to Cash Working Capital | | <u>(15,419)</u> |
| Cash Working Capital Per Division | | <u>\$ 219,609</u> |

Notes:

(1) Per Exhibit 3 (Michaelson), Schedule 1, page 4 of 4.

(2) Reflects exclusion of tank painting amortization and Division adjustments as summarized on Schedule TSC-3.

UNITED WATER RHODE ISLAND, INC.

Adjustment to Deferred Tank Painting Costs
Rate Year Ended December 31, 2012

| | <u>Amount</u> |
|--|-------------------|
| Average Balance Per Company | |
| Deferred Tank Painting | \$ 227,137 |
| Accumulated Deferrred Income Taxes | 79,498 |
| Net Balance per Company | <u>\$ 147,639</u> |
| Adjustment to Reflect Amortization from Completion | |
| Monthly Amortization for Howland Aerator and Sherman Tanks | 1,964 |
| Months from May 2008 through January 31, 2012 | 45 |
| Additional Amortization | \$ 88,401 |
| Accumulated Deferred Income Tax Effect | 30,940 |
| Net Reduction in Balance | <u>\$ 57,461</u> |
| Adjusted Balance per Division | |
| Deferred Tank Painting | 138,736 |
| Accumulated Deferrred Income Taxes | 48,558 |
| Net Balance per Division | <u>\$ 90,178</u> |

UNITED WATER RHODE ISLAND, INC.

Adjustment to Accumulated Deferred Income Taxes to
Reflect Federal Bonus Depreciation
Rate Year Ended December 31, 2012

| | <u>Amount</u> |
|---|------------------|
| <u>Increase in ADIT Balance due to Bonus Depreciation (1)</u> | |
| December 2011 | \$ 37,454 |
| January 2012 | 45,598 |
| February | 45,598 |
| March | 45,598 |
| April | 45,598 |
| May | 45,598 |
| June | 45,598 |
| July | 45,598 |
| August | 45,598 |
| September | 45,598 |
| October | 45,598 |
| November | 45,598 |
| December | 45,598 |
| | <hr/> |
| 13 Month Average Increase | <u>\$ 44,972</u> |

Note:

(1) Per response to Div. 6-1.

UNITED WATER RHODE ISLAND, INC.

Adjustment to Company Incentive Compensation Expense
Rate Year Ended December 31, 2012

| | <u>2012 Base Salary (1)</u> | <u>Historal Incentive Payment % (2)</u> | <u>Non Financial Percentage (3)</u> | <u>Recoverable Incentive Compensation</u> |
|--|---------------------------------|---|---|---|
| Supervisor | \$ 64,277 | 5.00% | 60.00% | \$ 1,928 |
| Superintendent | \$ 78,632 | 7.55% | 60.00% | 3,562 |
| Manager UWRI | \$ 99,695 | 12.45% | 60.00% | 7,447 |
| Total | | | | <u>\$ 12,938</u> |
| Amount per Company (1) | | | | <u>26,031</u> |
| Reduction in Total Eligible Incentive Compensation | | | | \$ (13,093) |
| Amount Charged to Capital at 21.09% (1) | | | | <u>(2,761)</u> |
| Adjustment to O&M Expense | | | | \$ (10,332) |
| Adjustment to FICA Taxes at 7.65% | | | | <u>(790)</u> |
| Total Adjustment to Rate Year Expense | | | | <u><u>\$ (11,122)</u></u> |

Note:

(1) Amounts per Exhibit 4 (Lippai), Schedule 2A, page 1 of 4.

(2) Percentages per Exhibit 4 (Lippai), Schedule 2A, page 1 of 4, multiplied by historical ratio of actual bonus to target bonus for Superintendent and Manager.

UNITED WATER RHODE ISLAND, INC.

Adjustment to Incentive Compensation included in UWM&S Fees
Rate Year Ended December 31, 2012

| | <u>Amount</u> |
|---|---------------------------|
| UWM&S Incentive Compensation attributable to Meeting Corporate Financial Goals (1) | \$ (17,000) |
| FICA Taxes at 7.65% | <u>(1,301)</u> |
| Adjustment to Rate Year UWM&S Fees | <u><u>\$ (18,301)</u></u> |

Note:

(1) Per response to Div. 8-1.

UNITED WATER RHODE ISLAND, INC.

Adjustment to Include OPEB Transition Obligation
In Determination of Benefits Transferred Out
Rate Year Ended December 31, 2012

| | <u>Amount</u> |
|--|-------------------|
| OPEB Transition Obligation (1) | \$ 5,113 |
| Percentage of Benefits Transferred Out (2) | <u>21.09%</u> |
| Adjustment to Operating Expense | <u>\$ (1,078)</u> |

Notes:

(1) Amount per response to Div. 6-5.

(2) Per Exhibit 4 (Lippai), Schedule 3A, page 1 of 1.

UNITED WATER RHODE ISLAND, INC.

Adjustment to Medical Benefits Expense
Rate Year Ended December 31, 2012

| | <u>Amount Per Filing (1)</u> | <u>Corrected Amount (2)</u> | <u>Adjustment</u> |
|---|----------------------------------|---------------------------------|--------------------------|
| Medical Waiver Payments | \$ 2,000 | \$ 3,000 | \$ 1,000 |
| Health, Dental and Vision Insurance | <u>118,851</u> | <u>107,800</u> | <u>(11,051)</u> |
| Adjustment to Operating Expenses | \$ 120,851 | \$ 110,800 | \$ (10,051) |
| Amount Charged to Capital at 21.09% (3) | | | <u>(2,120)</u> |
| Adjustment to O&M Expense | | | <u><u>\$ (7,931)</u></u> |

Notes:

(1) Per Exhibit 4 (Lippai), Schedule 8 and 8A, page 1 of 1.

(2) Per response to Div. 2-23.

(3) Per Exhibit 4 (Lippai), Schedule 3A, page 1 of 1.

UNITED WATER RHODE ISLAND, INC.

Adjustment to Rate Case Expense
Rate Year Ended December 31, 2012

| | <u>Amount</u> |
|--|---------------------------|
| Projected Rate Case Expense (1) | \$ 320,500 |
| Division Recommended Amortization Period-Years | <u>5</u> |
| Annual Amortization Expense | \$ 64,100 |
| Amortization per Company (1) | <u>106,833</u> |
| Adjustment to Amortization Expense | <u><u>\$ (42,733)</u></u> |

Note:

(1) Per Exhibit 4 (Lippai), Schedule 13.

UNITED WATER RHODE ISLAND, INC.

Adjustment to Outside Services Expense
Rate Year Ended December 31, 2012

| | <u>Amount</u> |
|--|--------------------------|
| Increase in Other Outside Services per Company (1) | \$ 4,403 |
| Amount Per Division (2) | <u>-</u> |
| Adjustment to Outside Services Expense | <u><u>\$ (4,403)</u></u> |

Notes:

(1) Per Exhibit 4 (Lippai), Schedule 15A.

(2) Refer to testimony.

UNITED WATER RHODE ISLAND, INC.

Adjustment to CIS Amortization Expense
Rate Year Ended December 31, 2012

| | <u>Amount</u> |
|---|---------------------------|
| CIS Investment (1) | \$ 472,333 |
| Division Recommended Amortization Period (Years) | <u>10</u> |
| Annual Amortization Expense per Division | \$ 47,233 |
| Amortization Expense per Company (1) | <u>67,476</u> |
| Adjustment to Amortization Expense | <u><u>\$ (20,243)</u></u> |
| | |
| Rate Year Accumulated Depreciation per Division (2) | \$ 33,501 |
| Rate Year Accumulated Depreciation per Company (1) | <u>\$ 47,859</u> |
| Adjustment to Accumulated Depreciation | \$ (14,358) |
| Deferred Income Tax Effect of Reduction in Accumulated Depr. at 35% | <u>\$ 5,025</u> |
| Net Adjustment tot Rate Base | <u><u>\$ 9,333</u></u> |

Notes:

(1) Per Exhibit 3 (Michaelson), Schedule 3, page 13.

(2) Calculated using Excel version of Exhibit 3, Schedule 3 with 10 year life.