BEFORE THE

PUBLIC UTILITIES COMMISSION

OF RHODE ISLAND

CITY OF NEWPORT)	
UTILITIES DEPARTMENT,)	DOCKET NO. 4025
WATER DIVISION)	

DIRECT TESTIMONY

OF

THOMAS S. CATLIN

ON BEHALF OF THE DIVISION OF PUBLIC UTILITIES AND CARRIERS

APRIL 2009

EXETER

ASSOCIATES, INC. 5565 Sterrett Place Suite 310 Columbia, Maryland 20904

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		UTILITIES DEPARTMENT,) DOCKET NO. 4025 WATER DIVISION)
		Direct Testimony of Thomas S. Catlin
1		<u>Introduction</u>
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 5565 Sterrett Place, Suite 310, Columbia, Maryland 21044.
6		Exeter is a firm of consulting economists specializing in issues pertaining to public
7		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
1		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
[4		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

CITY OF NEWPORT

feasibility, financial and implementation analyses in conjunction with utility construction projects. I also served as project engineer for two utility valuation studies.

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

In September 1981, I accepted a position as a utility rates analyst with Exeter Associates, Inc. I became a principal and vice-president of the firm in 1984. Since joining Exeter, I have continued to be involved in the analysis of the operations of public utilities, with particular emphasis on utility rate regulation. I have been extensively involved in the review and analysis of utility rate filings, as well as other types of proceedings before state and federal regulatory authorities. My work in utility rate filings has focused on revenue requirements issues, but has also addressed service cost and rate design matters. I have also been involved in analyzing affiliate relations, alternative regulatory mechanisms, and regulatory restructuring issues.

1		This experience has involved electric, natural gas transmission and distribution, and
2		telephone utilities, as well as water and wastewater companies.
3	Q.	HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY
4		PROCEEDINGS ON UTILITY RATES?
5	A.	Yes. I have previously presented testimony on more than 225 occasions before the
6		Federal Energy Regulatory Commission and the public utility commissions of
7		Arizona, California, Colorado, Delaware, the District of Columbia, Florida, Idaho,
8		Illinois, Indiana, Kentucky, Louisiana, Maine, Maryland, Montana, Nevada, New
9		Jersey, Ohio, Oklahoma, Pennsylvania, Utah, Virginia and West Virginia, as well as
0		before this Commission. I have also filed rate case evidence by affidavit with the
1		Connecticut Department of Public Utility Control.
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 several
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 and

1		3818; Providence Water Supply Board, Docket Nos. 2022, 2048, 2304, 2961, 3163,
2		3446, 3684, and 3832; <u>Kent County Water Authority</u> , Docket Nos. 2098 and 3942,
3		Woonsocket Water Department, Docket Nos. 2099 and 2904; United Water Rhode
4		Island, Inc., (formerly Wakefield Water Company), Docket Nos. 2006 and 2873; and
5		Pawtucket Water Supply Board, Docket Nos. 3193, 3378, 3497 and 3674.
6	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?
7	A.	Exeter Associates was retained by the Division to assist it in the evaluation of the rate
8		filing submitted by the City of Newport Utilities Department, Water Division
9		(Newport Water or the Water Division) on December 9, 2009. This testimony
10		presents my findings and recommendations with regard to the overall revenue
11		increase to which Newport is entitled and with regard to the design of rates to recover
12		those revenues.
13	Q.	HAVE YOU PREPARED SCHEDULES TO ACCOMPANY YOUR
14		TESTIMONY?
15	A.	Yes. I have prepared Schedules TSC-1 through TSC-12. Schedule TSC-1 provides a
16		summary of revenues and expenses under present and proposed rates. Schedules
17		TSC-2 through TSC-11 present my adjustments to Newport Water's claimed
18		revenues, operating expenses and debt service costs. Schedule TSC-12 presents the
19		development of the rates necessary to generate the Division's recommended
20		revenues.
21	Q.	WHAT TIME PERIODS HAVE YOU UTILIZED IN MAKING YOUR
22		DETERMINATION OF NEWPORT'S REVENUE REQUIREMENTS?
23	A.	Consistent with Newport Water's filing, I have utilized a test year that corresponds

1		year (FY) ending June 30, 2008 as the basis for determining the Water Division's
2		revenue requirements and the revenue increase necessary to recover those
3		requirements.
4	Q.	WHAT IS YOUR RECOMMENDATION WITH REGARD TO THE
5		APPROPRIATE INCREASE IN REVENUES IN THIS PROCEEDING?
6	A.	As shown on Schedule TSC-1, it is my recommendation that Newport Water receive
7		a revenue increase of \$1,763,385 in this proceeding. This amount is \$923,009 less
8		than the increase of \$2,680,394 that Newport Water has identified as necessary based
9		on rate year revenues at present rates.
10	Q.	WHAT IS YOUR RECOMMENDATION WITH REGARD TO HOW THE
11		ADDITIONAL REVENUES SHOULD BE RECOVERED?
12	A.	I have accepted Newport Water's proposal to recover the allowed increase through a
13		uniform percentage increase in existing rates and charges for metered water services
14		and fire protection services.
15		
16		Review of Rate Year Expenses
17	Q.	PLEASE PROVIDE AN OVERVIEW OF THE APPROACH THAT YOU
18		HAVE TAKEN IN THE REVIEW AND EVALUATION OF NEWPORT
19		WATER'S CLAIMED OPERATING EXPENSES FOR THE RATE YEAR?
20	A.	I have reviewed Newport Water's claims for the rate year in light of the amounts
21		approved in Docket No. 3818 for the 2008 test year, actual 2008 test year expenses,
22		and historical expenses for years prior to FY 2008. To perform this evaluation, I have
23		also reviewed the justification for the claimed increases or decreases in expenses for
24		the rate year based on the supporting documentation provided in Newport Water's

testimony as well as in its response	es to Division, Comm	nission and interveno	or data
requests.			

Based on my review, I believe that several elements of Newport Water's claimed costs are likely to overstate actual rate year expenses (e.g., dues and subscriptions, conferences and training, tuition reimbursement, etc.). However, for the most part, the cost elements in question are small. In developing my recommendation, I have elected to accept Newport Water's requested rate year expenses where the amount of the expense is small and/or where the amount of any adjustment that I would propose to an element of expense would be small. I have instead focused on several larger elements of costs for which I believe adjustments to the claimed rate year expenses are appropriate. These items are discussed in the subsequent sections of my testimony.

Q.

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Employee Vacancies

PLEASE SUMMARIZE THE BASIS FOR NEWPORT WATER'S RATE YEAR CLAIM FOR SALARIES AND WAGES.

Newport Water has calculated its claim for salaries and wages based on the projected FY 2010 projected salaries for its full complement of 48 full time employees. The salary and wage amounts reflect the pay changes that were implemented in 2009 as the result of a job classification study. While the overall number of employees does not change, the requested wages also reflect proposed changes in the staffing at the water treatment plants to add an Assistant Water Quality Supervisor.

WHAT CONCERN DO YOU HAVE WITH NEWPORT WATER'S CLAIM?

1	A.	I disagree with Newport Water's assumption that all of the employee positions will be
2		filled throughout the rate year. Currently, Newport Water has four vacant positions
3		and it has at least two unfilled positions in every quarter of FY 2007, FY 2008 and
4		FY 2009 to date. The average number of employee vacancies was 2.75 in FY 2006,
5		2.5 in FY 2007 and 2.75 in FY 2008. Such employee vacancies occur as the result of
6		normal employee turnover and it is unreasonable to assume that no employee
7		vacancies will occur with FY 2010 rate year.
8	Q.	WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO
9		NEWPORT'S CLAIMED COST OF SERVICE TO RECOGNIZE VACANT
10		EMPLOYEE POSITIONS DURING THE RATE YEAR?
11	A.	I am proposing to reduce rate year salaries and wages and benefits expense to reflect
12		an average of two vacant positions. To calculate the adjustment to rate year expenses
13		for these vacant positions, I have utilized the average wages and average benefits for
14		the four vacant positions that currently exist. As shown on Schedule TSC-3, this
15		adjustment reduces rate year expense by a total of \$145,752.
16		
17		Overtime Wages
18	Q.	WHAT ADJUSTMENTS TO OVERTIME WAGES ARE YOU
19		RECOMMENDING?
20	A.	I am proposing to reduce the overtime wages included by Newport Water for two
21		divisions - Customer Service and Source of Supply-Mainland. During the FY 2008
22		test year, Customer Service division employees worked 131.5 overtime hours.
23		(Response to Div. 2-4.) According to Newport Water, an additional 500 overtime
24		hours are projected to be necessary during the rate year in conjunction with the

program to install radio read meters because many customers are only available on
weekends. However, in developing its claimed cost of service, Newport Water
included 743 overtime hours, an increase of 611.5 hours compared to the test year.
The level of overtime in the test year is consistent with the three-year historical
average for FY 2006 through FY 2008 (143 hours). Accordingly, I am proposing to
limit the increase on overtime hours to the 500 hours for which Newport Water has
provided a justification. This results in a reduction in overtime expense of \$3,680 for
the Customer Service Division, as shown on Schedule TSC-4.

PLEASE EXPLAIN YOUR CONCERN WITH REGARD TO SOURCE OF SUPPLY-MAINLAND OVERTIME.

Newport Water has included 444 overtime hours in the rate year claim for the Source of Supply-Mainland division, an increase of 194 hours compared to the 250 overtime hours for Source of Supply Mainland employees in the test year. Ms. Forgue indicates that this increase is necessary to normalize the level of overtime to reflect the variability in the amount the Sakonnnet raw water pump station is utilized from year to year. However, a review of the historical data does not support the requested increase.

As noted above, the number of overtime hours worked by Source of Supply-Mainland employees in the FY 2008 test year was 250. This compares to zero hours in FY 2004, FY 2005 and FY 2007 and 224 hours in FY 2006. Moreover, the hours worked by temporary employees, who are used to help man the raw water pump station in coordination with overtime by regular employees, were also at 5-year highs in FY 2008. Accordingly, Newport Water has not demonstrated any justification for the claimed increase.

Q.

A.

Q. WHAT ADJUSTMENTS ARE YOU PROPOSING?

A. I am proposing to eliminate the claimed 194 hour increase in overtime hours for the

Source of Supply-Mainland division that were included in Newport Waters rate year

claim. To be conservative, I have not reduced overtime or temporary employee hours

below the test year level even though both were at five-year highs. As shown on

Schedule TSC-4, this adjustment reduces rate year expense by \$3,429. Combined

with the adjustment to Customer Service division overtime, the total reduction in

overtime expense I am recommending is \$7,172.

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Consultant Fees

11 Q. PLEASE SUMMARIZE NEWPORT WATER'S RATE YEAR CLAIM FOR
12 CONSULTANT FEES.

13 A. According to the response to Div. 1-27, Newport Water's rate year claim for 14 consultant fees is comprised of the following:

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•	Current Rate Case (amortized over 2 years)	\$116,500
•	Cost of Service Study (for next case)	50,000
•	Updated Risk Management Study	10,000
•	Other Fees	<u>73,500</u>
	Total	\$250,000

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Q.

WHAT ADJUSTMENTS ARE YOU PROPOSING TO MAKE TO THE

ALLOWANCE FOR CONSULTANTS INCLUDED IN RATES?

I am proposing three changes to the Newport Water's claimed level of consultant
fees. First, I am recommending that the projected costs associated with preparing the
class cost of service study be deferred and recovered as a part of the costs of Newport
Water's next rate case. This is appropriate because the undertaking of such a study is

1		infrequent and the results are expected to be used to set rates when Newport files its
2		next rate case.
3		Second, an updated risk management study and countermeasures study is only
4		undertaken every five years. Therefore, rather than treating the costs of this study as
5		an annual expense, I am proposing to amortize the cost over two years, the same
6		amortization period proposed by Newport Water for rate case expense. In order to
7		minimize the cash flow effects, I have proposed an amortization period of two years,
8		rather than five years based on the frequency of such risk management studies.
9		Finally, I am proposing to reduce the amount included for other consultant
10		fees from \$73,500 to \$50,000. Newport has indicated it expects to incur additional
11		costs in the rate year due to expected debt financings. However, no other support has
12		been provided for its claimed expense. Over the last three years, non-rate case
13		consultant fees have been \$31,119 in FY 2006, \$8,162 in FY 2007 and \$37,747 in FY
14		2008 for an average of less than \$26,000 per year. My recommended allowance of
15		\$50,000 represents an expense of approximately twice this annual average.
16	Q.	HAVE YOU PREPARED A SCHEDULE SUMMARIZING YOUR
17		ADJUSTMENT TO CONSULTANT FEES?
18	A.	Yes. Schedule TSC-5 shows the derivation of my adjustment. As shown there, the
19 20		three changes I have recommended reduce rate year expense by \$78,500.
21		Chemical Costs
22	Q.	PLEASE EXPLAIN YOUR ADJUSTMENT TO CHEMICAL EXPENSES.
23	A.	Newport Water, like other Rhode Island utilities with which I am familiar

experienced significant increase in chemical prices in 2008. These increases were

driven by world-wide demand as well as increases in energy in prices. In preparing

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its projection of chemical costs for the rate year, Newport Water assumed that it
would experience increases in chemicals prices in FY 2010 that were comparable to
the increases experienced in FY 2009 compared to FY 2008.

In light of the ongoing recession and the significant decline in energy prices that has occurred in late 2008 and 2009, it is no longer reasonable to expect that FY 2010 chemical prices will increase by as much as 20 percent over FY 2009 prices. Newport Water indicates that its actual FY 2010 chemical prices will be known in May 2009. Pending receipt of these actual prices, I have adjusted chemical costs to reflect the prices now in effect. As shown on Schedule TSC-6, this adjustment reduces projected rate year chemical costs by \$82,500. At such time as new prices become known, it would be appropriate to update rate year costs.

A.

Q.

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Motor Vehicle Fuel Expense

14 Q. PLEASE EXPLAIN THE ISSUE YOU HAVE IDENTIFIED WITH

REGARD TO MOTOR VEHICLE FUEL EXPENSE?

In its filing, Newport Water adjusted test year gasoline and diesel fuel costs to reflect the highest prices that it paid for those fuels in FY 2008, adjusted upward by three percent to account for additional fuel cost increases. Since Newport Water prepared its filing, gasoline and diesel fuel prices have declined significantly and the prices utilized by Newport Water are no longer representative.

HOW DO THE PRICES THAT NEWPORT WATER USED FOR
GASOLINE AND DIESEL FUEL COMPARE TO RECENT PRICES?
In its filing, Newport Water utilized a price of \$3.18 per gallon for gasoline. In

comparison, Newport Water paid \$1.74 per gallon for gasoline in November, \$1.55

I		per gallon in December, and \$1.58 per gallon in January. For diesel fuel, the price
2		per gallon utilized by Newport Water was \$4.16. In comparison, Newport Water paid
3		an average of \$2.52 per gallon in November, \$2.12 per gallon in December and \$2.22
4		per gallon in January.
5	Q.	WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO
6		NEWPORT WATER'S CLAIMED EXPENSE?
7	A.	I am proposing to adjust motor vehicles full expense to reflect the average prices paid
8		for gasoline and diesel fuel in November 2008 through January 2009. As shown on
9		Schedule TSC-7, this adjustment results in a reduction in projected rate year expenses
10		of \$25,469.
11		
12		<u>City Services</u>
13	Q.	PLEASE SUMMARIZE NEWPORT WATER'S CLAIM WITH REGARD
14		TO PAYMENTS TO THE CITY OF NEWPORT FOR LEGAL AND
15		ADMINISTRATIVE SERVICES AND DATA PROCESSING SERVICES?
16	A.	Newport Water has presented a new set of allocations of the costs of City services
17		that is based on the methodology set forth in the Cost Allocation Manual filed with
18		the Commission in October 2008. Based on that new methodology, Newport Water
19		is seeking to increase the amount paid to the City for legal and administrative services
20		from the \$219,177 approved for the FY 2008 rate year in Docket No. 3818 to
21		\$539,500 for the FY 2010 rate year in this case. This represents a 146 percent
22		increase. For data processing services, Newport Water is seeking an increase from
23		the \$156,368 approved in Docket No. 3818 to \$226,000, an increase of 45 percent.

1		Combined, the proposed increases in payments to the City of Newport total \$389,955
2		and account for nearly 15 percent of the total increase sought in this proceeding.
3	Q.	HAS THE COST ALLOCATION MANUAL BEEN REVIEWED BY THE
4		PARTIES AND APPROVED PRIOR TO THIS PROCEEDING?
5	A.	No. In Docket No. 3818, the Commission directed Newport Water to file a Cost
6		Allocation Manual (CAM). This proceeding represents the Division's and
7		intervenors' first opportunity to address the allocation procedures set forth in the
8		CAM. Considering that Newport Water has proposed numerous changes in the
9		allocation procedures approved by the Commission in Docket No. 3818, the new
10		methodology is clearly subject to review and challenge in this docket.
11	Q.	WHAT IS YOUR POSITION WITH REGARD TO THE ALLOCATION
12		METHODOLOGY PROPOSED BY NEWPORT WATER?
13	A.	It is my position that several of the proposed allocation procedures result in the
14		overstatement of the costs allocated to Newport Water.
15	Q.	WHAT IS YOUR FIRST CONCERN WITH REGARD TO THE
16		ALLOCATION OF CITY OF NEWPORT LEGAL AND
17		ADMINISTRATIVE AND DATA PROCESSING COSTS TO NEWPORT
18		WATER?
19	A.	My first concern relates to the calculation of Newport Water's share of the City's
20		budget, which is used to allocate City Manager, City Solicitor, Finance
21		Administration and a portion of data processing (MIS) costs to Newport Water.
22		Rather than using its allowed revenue requirement as the Commission approved in
23		Docket No. 3675 and No. 3818, Newport Water utilized a budget figure that includes
24		O&M expense, depreciation, repayment to the City of Newport, capital funded fixed

assets, rate funded capital expenditures, debt service and the operating/revenue reserve. This is inappropriate because depreciation, debt service, debt funded capital expenditures and rate funded capital expenditures are overlapping measures of capital costs and inclusion of all four items results on a significant overstatement of costs. In addition, the repayment of the City of Newport has now been completed and should not be included. Finally, the operating/revenue reserve is not a true expense, but is more like a contingency allowance that is not included for other city operations.

In addition to overstating Newport Water's costs, the overall City budget is understated by the exclusion of the City's General Fund contribution to the School Department and Public Library. This is inconsistent with the procedure approved in Docket No. 3818 and is inappropriate for several reasons. First, it is unreasonable to assume that the City Manager who is responsible for preparing the City's budget is not at all involved in addressing the portion of that budget that goes to the schools or the library. Second, the City's finance director and two City Council members are members of the School Department's ad hoc building committee. Third, the City Council holds workshops and joint meetings to address the school and library budgets. The City Manager and finance director presumably participate in those meetings. Finally, the listing of bank and investment accounts for which the Finance Administration division is responsible, as provided in response to PWFD 1-15(e), includes numerous School Department accounts.

WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO THE CALCULATION OF NEWPORT WATER'S PERCENTAGE OF THE TOTAL CITY BUDGET?

Q.

¹ It should be noted that General Fund contribution is only a small component of the total School Department budget.

1	A.	Consistent with past practice and Commission precedent, I am proposing to base the
2		percentage on Newport Water's cost of service as ultimately approved in this
3		procedure compared to the City's budget. For the City Manger, City Solicitor, and
4		Finance Administration costs, I am also including the General Fund contribution to
5		the Schools and Library in the total budget. For data processing costs I have not
6		included the General Fund contribution to the Schools because I have accepted
7		Newport's indication that the schools have their own computer systems. As shown
8		on Schedule TSC-8, page 2 of 2, these revisions result in a Newport Water budget
9		percentage allocation factor of 11.17 percent non-MIS costs and 14.29 percent for
10		MIS costs based on the Division's recommended cost of service. These percentages
11		compare to the 22.30 percent allocation proposed by Newport Water (as reflected in
12		RFC Schedule D, Corrected 2 provided in response to PWFD 1-14). In Docket No.
13		3818, the percentage of costs allocated to Newport Water based on the budget
14		allocator was 10.39 percent.
15	Q.	DO YOU HAVE ANY CONCERNS WITH THE COSTS ALLOCATED
16		USING THE BUDGET PERCENTAGE?
17	A.	Yes. Newport Water has divided the budget for Finance Administration into four
18		components. First, it pulled out the purchasing agent budget and allocated 17.90
19		percent of those costs to Newport Water based on the number of purchase orders. It
20		then took 80 percent of the remaining budget and allocated that component on the

budget percentage. Ten percent of the remainder after excluding the purchasing agent

was allocated 31 percent to Newport Water based on the number of bank and

investment accounts. The final 10 percent was not allocated to Newport Water.

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Overall, this	s resulted in	\$98,147	or 20.5	percent	of the total	Finance	Administration
budget bein	g allocated t	to Newpo	rt Wate	er.			

Again, I have several concerns with this methodology. First, little or no recognition is being given to the fact that Newport Water shares a Director of Finance with the WPC Division and pays 60 percent of the associated salary and benefits. In addition, Newport Water has its own full-time financial analyst. In the last two proceedings, this has been accounted for by including only 50 percent of the Finance Administration budget as allocable to Newport Water.

My second concern is the number of water-related bank and investment accounts is overstated by the inclusion of a separate Water Billing Charges accounts and a Water Repayment Account, both of which are being eliminated. In addition, two water debt service accounts, two water debt service reserve accounts, and a water sinking fund account have all been included. It is unclear why duplicative accounts are required. Finally a separate account is included for each restricted fund. It does not appear reasonable to give each of these accounts the same weight as City's General Fund Account and Imprest Account that are used for all City departments other than water.

My third concern pertains to the purchasing agent component of Finance Administration costs. As noted by Ms. Forgue on page 35 of her testimony, the costs associated with advertising for bids and RFPs are now directly charged to Newport Water for its bids. However in determining Newport Water's share of the purchasing agent's total budget, no adjustment was made for this direct assignment.

WHAT CHANGES ARE YOU PROPOSING TO THE ALLOCATION OF FINANCE ADMINISTRATION COSTS?

Q.

1	A.	To address the concerns discussed above, I am proposing to calculate Newport
2		Water's share of Finance Administration costs other than for Purchasing by applying
3		my revised budget allocator to one-half of the total budget for this division. This is,
4		consistent with the procedure approved in prior proceedings. For purchasing, I am
5		proposing to exclude legal advertising costs, totaling \$14,000, from the costs eligible
6		for allocation to Newport Water.
7	Q.	WHAT OTHER ISSUES HAVE YOU IDENTIFIED WITH REGARD TO
8		THE PROPOSED ALLOCATION OF CITY OF NEWPORT LEGAL AND
9		ADMINISTRATIVE COSTS TO NEWPORT WATER?
10	A.	I have identified issues with regard to the allocation of City Council and City Clerk
11		costs, Assessment Division costs, Collections Division costs and Accounting Division
12		costs.
13	Q.	PLEASE EXPLAIN YOUR CONCERN WITH THE ALLOCATION OF
14		CITY COUNCIL AND CITY CLERK COSTS?
15	A.	Newport Water's share of these costs has been calculated based on the number of
16		Council meeting agenda items for water matters compared to the total number of
17		Council meeting agenda items. Based on this methodology, Newport concluded that
18		11.4 percent of the time of the City Council and City Clerk are devoted to Newport
19		Water. However, a review of the Council minutes indicates that Newport has
20		significantly overstated the percentage of time devoted to water issues.
21	Q.	PLEASE EXPLAIN.
22	A.	First, the 11.4 percent is based only on the agenda items at regular council meetings.
23		It does not include the items addressed by the Council in executive session or the
24		items addressed by the Council serving as the Licensing Commission. It also does

not consider the time Council members spend at meetings and workshops and special events, serving on the School's Ad Hoc Building Committee or any other activities in which council members participate.

In addition, the count of agenda items used by Newport treats all items on the consent agenda as a single time. However, a review of the Council meeting minutes reveals that there are numerous items on the consent agenda each month and that the items on that agenda are frequently removed and discussed individually. For example, the minutes from the November 14, 2007 Council meeting included 14 consent agenda items, two of which included multiple subparts. Eight of those items were removed and the minutes include almost three pages of discussion on the removed items. Out of 8 pages of minutes for that meeting, six lines relate to the three water items on that agenda. However, under Newport's approach three twenty-firsts (14.3 percent) of the Council's time at that meeting was devoted to Newport Water issues.²

WHAT IS YOUR RECOMMENDATION?

Based on the information provided, an allocation of 11.4 percent of the City Council's and Clerk's budgets to Newport Water is excessive. For the City Council, it is my recommendation that no more than five percent of the costs be allocated to Newport Water. With regard to the City Clerk, Newport Water has not demonstrated that the allocation should differ from the one percent approved by the Commission in Docket No. 3818 and I have used that one percent allocation.

Q.

A.

² It is also worth noting that one of the twenty-one numbered agenda items at the meeting includes a resolution allowing the Mayor to sign a letter seeking funds from the Rhode Island Department of Education for Newport's Schools.

1	Q.	PLEASE ADDRESS YOUR CONCERN WITH REGARD TO THE
2		ALLOCATION OF THE CITY ASSESSOR'S OFFICE COSTS TO
3		NEWPORT WATER.
4	A.	In its filing, Newport Water has been allocated 10 percent of the City Assessor's
5		salary and benefits. This allocation was based on the Assessor's estimate that he
6		spends 10 percent of his time dealing with Newport Water matters. However, in
7		response to PWFD 2-9, Newport Water provided an analysis that indicated that the
8		average cost of the services performed by the assessor would be approximately
9		\$12,400 per year if they were outsourced at a cost of \$125 per hour. (\$12,400 divided
10		by \$125 per hour equals 99 hours.) This indicates an allocation of 5 percent of the
11		Assessor's salary and benefits is more reasonable and I have utilized this percentage
12		as the basis for my recommendation.
13	Q.	WHAT IS YOUR RECOMMENDATION WITH REGARD TO THE
14		ALLOCATION OF COLLECTIONS COSTS?
15	A.	The Collections Division of the Finance Department has been allocated to Newport
16		Water based on the number of water payments collected compared to the total tax
17		water and sewer and ticket payments processed. This allocation fails to give any
18		weight to the additional tax notices and delinquent notices or to the Collection
19		Division's other activities including the issuance of residential parking and fishing
20		permits, as well as verifying and depositing funds received from other City
21		departments.
22		In recognition of the other activities performed by the Collection Division, I
23		have included not only payments processed, but also tax notices, parking permits,
24		fishing permits and MLCs issued in the denominator for determining Newport

1		Water's percentage responsibility for the Division's costs. This reduces the
2		percentage from 20.5 percent to 17.1 percent. I believe that even this percentage is
3		likely to overstate Newport Water's share of Collections costs because I have not
4		included delinquent notices issued.
5	Q.	WHAT IS YOUR CONCERN WITH REGARD TO THE ALLOCATION OF
6		ACCOUNTING DIVISION COSTS?
7	A.	In Newport Water's filing, 5 percent of the Controller's and Accounting Supervisor's
8		salary and benefits have been "pulled out" and directly assigned to Newport Water.
9		The remainder of the Accounting Division's costs has been allocated to Newport
10		Water based on the relative payroll and vendor checks. No justification for the direct
11		assignment of 5 percent of Controller's and Accounting Supervisor's payroll costs
12		other than the statement in the CAM that those employees spend a significant amount
13		of time on water fund transfers and cash flow issues. This separate allocation is
14		arbitrary and unsupported. Accordingly, I have allocated all Accounting Division
15		costs on the basis of the relative number of checks.
16	Q.	HAVE YOU PREPARED A SCHEDULE THAT PRESENTS YOUR
17		CALCULATION OF THE APPROPRIATE CHARGES FOR CITY
18		SERVICES?
19	A.	Yes. Schedule TSC-8 presents my analysis of the charges for City Services after
20		recognizing the revisions discussed above. As indicated there, I am proposing an
21		allowance of \$331,622 for legal and administrative City services and \$152,631 for
22		data processing services compared to Newport Water's claims of \$539,500 and
23		\$226,000, respectively.
24		

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I		Revenue Offsets
2	Q.	WHAT ADJUSTMENT ARE YOU RECOMMENDING TO THE
3		REVENUE OFFSETS THAT NEWPORT WATER HAS RECOGNIZED IN
4		THE RATE YEAR?
5	A.	Newport Water has included the amounts that it recovers for the costs of providing
6		metering and customer accounting services to Newport's Water Pollution Control
7		(WPC) Division as a revenue offset. In calculating the rate year revenue offset,
8		Newport Water included 50 percent of customer accounting O&M and debt service
9		associated with the radio read program. However, it did not include a portion of the
10		rate year cash expenditures for meter replacements. Consistent with the treatment of
11		other metering and customer accounting costs, I am recommending that the rate year
12		revenue offset from the WPC Division be adjusted to include one-half of the
13		expenditures for meter replacements. ³ As shown on Schedule TSC-11, this
14		adjustment increases the rate year revenue offsets by \$32,766. I have based this on
15		the average budgeted expenditures in FY 2010 and FY 2011, consistent with my
16		adjustment to the contribution to the capital spending restricted fund.
17		
18		Operating Reserve Allowance
19	Q.	WHAT IS NEWPORT WATER'S PROPOSAL WITH REGARD TO THE
20		OPERATING REVENUE ALLOWANCE THAT IT SHOULD RECEIVE?
21	A.	Newport Water has requested an operating revenue allowance equal to three percent
22		of total O&M expense. Mr. Smith indicates that Newport Water is willing to accept

³ Currently, Newport Water bills the WPC Division for all of the costs attributable to sewer services, in turn, and the WPC Division bills the Town of Middletown for a portion of those costs. Prospectively, Newport Water is proposing to bill the WPC Division and the Town of Middletown separately for their prospective shares of the costs.

1		the same restrictions on the use of this reserve that the Commission ordered for Kent
2		County Water Authority (KCWA) in Docket No. 3942.
3	Q.	WHAT IS YOUR POSITION?
4	A.	I do not object to Newport Water receiving an operating revenue allowance equal to
5		three percent of O&M as long as its use of those funds is subject to the same
6		restrictions adopted for KCWA.
7		
8		Rate Design
9	Q.	HAVE YOU DEVELOPED RECOMMENDED RATES TO RECOVER
10		THE REVENUE INCREASE THAT YOU HAVE IDENTIFIED AS
11		NECESSARY?
12	A.	Yes. I am proposing that the allowed revenue increase be recovered through a
13		uniform percentage increase in all rates for water service and fire service. The
14		calculations of my rate recommendations are presented on Schedule TSC-12. As
15		shown on page 1 of that schedule, the revenue increase of \$1,763,385 that I have
16		recommended on behalf of the Division represents an increase of 18.85 percent over
17		the rate year revenue at existing water and fire service rates. Page 2 of Schedule
18		TSC-11 presents the calculation of the rates necessary to generate this increase and
19		provides a proof of revenue at proposed rates.
20	Q.	DOES THIS COMPLETE YOUR DIRECT TESTIMONY?
21 22	A.	Yes, it does.

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BEFORE THE

PUBLIC UTILITIES COMMISSION

OF RHODE ISLAND

CITY OF NEWPORT)	•
UTILITIES DEPARTMENT,)	DOCKET NO. 4025
WATER DIVISION)	

SCHEDULES ACCOMPANYING THE

DIRECT TESTIMONY

OF

THOMAS S. CATLIN

ON BEHALF OF THE DIVISION OF PUBLIC UTILITIES AND CARRIERS

APRIL 2009



ASSOCIATES, INC. 5565 Sterrett Place Suite 310 Columbia, Maryland 20904

Summary of Revenues and Expenses at Present and Proposed Rates Rate Year Ended June 30, 2010

		Rate Year Amount Per Newport	A A	Division Adjustments	Rate Year at Present Rates	P. I	Proposed Rate Increase	Rate Year at Proposed Rates
Revenue Customer Charge Retail Consumption	€9	846,410 5,631,416	€9		\$ 846,410 5,631,416	& _	159,700 1,061,782	\$ 1,006,110 6,693,198
Wholesale/Bulk Sales Fire Protection		1,799,352 1,079,120		, ,	1,799,352 1,079,120		339,313 203,608	2,138,665 1,282,728
Miscellaneous Total Revenue	€\$	708,065 10,064,363	↔	32,766	740,831 \$ 10,097,129	₩	\$ 1,764,403	740,831 \$ 11,861,532
Expenses Water Administration		2.527.400		(360,446)	2,166,954			2.166.954
Customer Accounts		724,850		(7,352)	717,498			717,498
Source of Supply-Island		633,700		(83,780)	549,920			549,920
Source of Supply-Mainland		146,500		(3,492)	143,008			143,008
Treatment & Pumping-Newport Plant		1,712,800		(38,127)	1,674,673		•	1,674,673
Treatment & Pumping-Lawton Valley		1,650,150		(38,906)	1,611,244		•	1,611,244
Water Laboratory		249,450		ı	249,450		•	249,450
Transmission & Distribution Maintenance		1,100,900		(88,536)	1,012,364			1,012,364
Fire Protection		21,000		'	21,000		-	- 1
Subtotal	₩	8,766,750	↔	(620,639)	\$ 8,146,111	↔		\$ 8,146,111
Payment to City General Fund		1			1		•	•
Debt Service		2,072,985	69	(179,884)	1,893,101		•	1,893,101
Capital Outlays		1,652,019		(75,101)	1,576,918			1,576,918
Total Expenses	(/)	12,491,754	69	(875,624)	\$ 11,616,130	69	,	\$ 11,616,130
Operating Reserve		263,003		(18,619)	244,383		,	244,383
Total Cost of Service	↔	12,754,757	₩	(894,243)	\$ 11,860,513	↔		\$ 11,860,513
Revenue Surplus/(Deficiency)		(\$2,690,394)		\$927,009	(\$1,763,385)	₩	1,764,403	\$1,019

Summary of Division Adjustments to Rate Year Expenses Rate Year Ended June 30, 2010

Description	Amount		Source
Employee Vacancies	\$	(145,752)	Schedule TSC-3
Overtime Wages		(7,172)	Schedule TSC-4
Consultant Fees		(78,500)	Schedule TSC-5
Chemical Costs		(82,500)	Schedule TSC-6
Motor Vehicle Fuel Expense		(25,469)	Schedule TSC-7
City ServicesLegal & Administative		(207,878)	Schedule TSC-8
City ServicesData Processing		(73,369)	Schedule TSC-8
Updated Debt Costs		(179,884)	Schedule TSC-9
Capital Outlays		(75,101)	Schedule TSC-10
Operating Reserve		(18,619)	See Note (1)
Total Expense Adjustments	\$	(894,243)	
Revenue Offsets		32,766	Schedule TSC-11
Total Division Adjustments to Income	\$	927,009	

⁽¹⁾ Based on 3.0% of total O&M expenses as reflected on Schedule TSC-1.

Adjustment to Salaries and Wages to Reflect Normal Employee Vacancies Rate Year Ended June 30, 2010

Current Vacant Positions (1)	Salary (2)	Be	nefits (2)
Maintenance Mechanic-Distibution Maintenance Mechanic-Source of Supply Laborer-Source of Supply Assistant Water Quality Production Supervisor	\$ 52,518 51,003 37,840 49,748	\$	27,640 28,663 15,711 28,380
Average	\$ 47,777	\$	25,099
Normal Employee Vacancies (3)	2		2
Reduction in Claimed Salaries and Benefits	\$ 95,555	\$	50,197
Total Adjustment to Rate Year Expense (4)		\$	145,752

- (1) Per responses to Div. 1-5 and 2-1.
- (2) Per RFC Schedule B-3, B-5, B-6 and B-8.
- (3) Per response to Div. 1-6.
- (4) Adjustment has been included one-half in Distribution and one-half in Source of Supply for income summary purposes.

Adjustment to Overtime Wages Rate Year Ended June 30, 2010

	Ad	justment
Customer Service Division		
Test Year Overtime Hours (1)		131.5
Additional Hours for Radio Read		500.0
Overtime Hours per Division		631.5
Hours per Newport Water Filing (2)		743.0
Adjustment to Overtime Hours		(111.5)
Overtime Hourly Rate (2)	\$	33.00
Adjustment to Customer Service Expense	\$	(3,680)
Source of Supply-Mainland Test Year Overtime Hours (3)		250.0
Additional Hours to Normalize		230.0
Overtime Hours per Division		250.0
Hours per Newport Water Filing (3)		444.0
Adjustment to Overtime Hours		(194.0)
Overtime Hourly Rate (3)	\$	18.00
Adjustment to Source of Supply-Mainland Expense	\$	(3,492)
Total Adjustment to Overtime Wages	\$	(7,172)

- (1) Per response to Div. 2-4.
- (2) Per RFC Schedule B-2
- (3) Per RFC Schedule B-4.

Adjustment to Consulting Fees Rate Year Ended June 30, 2010

		nount Per ewport (1)	 nount Per Division	Ac	Adjustment		
Rate Case Expense Cost of Service Study (2) Updated Risk Management Study (3) Other Fees	\$	116,500 50,000 10,000 73,500	\$ 116,500 - 5,000 50,000	\$	(50,000) (5,000) (23,500)		
Adjustment to Expense				\$	(78,500)		

- (1) Per response to Div. 1-27.
- (2) Division recommendation is for deferral and recovery of rate case expense when study is presented.
- (3) Disivion recommendation is for amortization over 2 years.

CITY OF NEWPORT -- WATER DIVISION

Adjustment to Chemicals Expense Rate Year Ended June 30, 2010

	Am	Amount Per Newport (1)	Am Div	Amount Per Division (2)	PA	Adjustment
Newport Plant	↔	411,000	↔	373,300	↔	(37,700)
Lawton Valley		261,000		222,400		(38,600)
Source of Supply Island		67,500		61,300		(6,200)
Adjustment to Include costs in Debt Service Resrtricted Account	↔	739,500	₩	657,000	မာ	(82,500)

- (1) Amounts per RFC Schedule 3.
- (2) Amounts per Div. 2-10 excluding projected 2010 unit price increases. For Source of Supply-Island, Diviision amount is calculated based on FY 2009 copper sulfate price and usage per Schedule RFC B-3.

CITY OF NEWPORT--WATER DIVISION

Adjustment to City Services Costs Rate Year Ended June 30, 2010

Adjustment	(669) \$	(3,673)	(1,043)	(3,660)	(427)	(306)	(3,607)	(12,053)	\$ (25,469)
Cost per Jewport <u>Water</u>	1,426	7,495	2,315	7,468	872	624	8,007	24,594	52,801
Cost per <u>Division</u> N	\$ 727 \$	3,822	1,272	3,808	445	318	4,400	12,541	\$ 27,332 \$
Price per Gallon (2)	\$ 1.623	1.623	2.287	1.623	1.623	1.623	2.287	1.623	-
Gallons (1)	448	2,355	556	2,346	274	196	1,924	7,727	15,826
	Gasoline	Gasoline	Diesel	Gasoline	Gasoline	Gasoline	Diesel	Gasoline	
	Administration	Customer Service	Source of Supply-Island	Source of Supply-Island	Newport Plant	Lawton Valley	Distribution	Distribution	Total

Notes: (1) Per RFC Schedules B-1 through B-8.

⁽²⁾ Based on average prices paid in November 2008 through January 2009.

Adjustment to City Services Costs Rate Year Ended June 30, 2010

Legal and Administrative Services		Total City <u>Budget</u>	Ac	djustment (1)		Allocable <u>Budget</u>		location to ter Division	Percent	<u>Note</u>
City Council	\$	76,755	\$	-	\$	76,755	\$	3,838	5.00%	(1)
City Clerk		319,706		-		319,706		3,197	1.00%	(1)
City Manager		418,103		-		418,103		46,723	11.17%	(2)
City Solicitor		289,177		-		289,177		32,315	11.17%	(2)
Human Resources		303,338		-		303,338		39,131	12.90%	(3)
Finance Administration		387,963		(193,982)		193,982		21,677	11.17%	(2)
Purchasing		90,123		(14,000)		76,123		13,626	17.90%	(3)
Assessment		113,456		=		113,456		5,673	5.00%	(3)
Collections		313,663		-		313,663		53,636	17.10%	(2)
Accounting		393,700		-		393,700		43,996	11.17%	(3)
Audit Fees		84,875		-		84,875		5,245	6.18%	(3)
Citizen Survey		16,000		-		16,000		1,328	8.30%	(3)
Public Safety		28,531,884		-		28,531,884		28,532	0.10%	(3)
Facilities Maintenance		654,108				654,108		32,705	5%	(3)
Total Allocated on Budget	\$	31,992,851	\$	(207,982)	\$	31,784,870	\$	331,622	0.00%	
Amount per Newport Water								539,500		
Adjustment to Legal & Administrative							\$	(207,878)		
Data Processing Services		Total City Budget	,	Adjustme <u>nt</u>		Allocable <u>Budget</u>		location to	Percent (1)	
	_					202.502		05.000	7.00%	(2)
MIS - Communications Costs	\$	328,960		_		328,960 886,172		25,988	7.90% 14.29%	(3) (2)
MIS - Other Costs	•	886,172	Φ.		•		•	126,643	14.29%	(2)
	\$	1,215,132	Þ	-	\$	1,215,132	Ф	152,631		
Amount per Newport Water								226,000		
Adjustment to Data Processing Services							\$	(73,369)		

- (1) Refer to testimony(2) Refer to page 2 of this schedule..(3) Percentage per Newport Water Filing

Calculation of City Services Allocation Factors Rate Year Ended June 30, 2010

Percentage Applicable to Non-MIS Costs	_ <u>A</u>	FY 2009 dopted Budget	<u>Percentage</u>
General Fund Including School & Library	\$	77,948,747	73.44%
Maritime	\$	1,483,000	1.40%
Water Fund	\$	11,860,513	11.17%
WPC	\$	12,628,836	11.90%
Parking	\$	1,347,952	1.27%
Beach	\$	866,324	0.82%
Total Budget	\$	106,135,372	100.00%
Percentage Applicable to MIS - Other Costs	_ <u>A</u>	FY 2009 dopted Budget	<u>Percentage</u>
General Fund Less School	\$	54,806,022	66.04%
Harbor		1,483,000	1.79%
Water Fund		11,860,513	14.29%
WPC		12,628,836	15.22%
Parking		1,347,952	1.62%
Beach		866,324	1.04%
Total Budget	\$	82,992,647	100.00%

Adjustment to Reflect Updated Debt Service Costs for Debt Service Restricted Account Contribution Rate Year Ended June 30, 2010

		Total
Existing Debt Service (1)	\$	1,280,215
Proposed Debt Service (1)		612,886
Adjusted Debt Service Requirement (1)	\$	1,893,101
Amount per Newport Water Filing (2)		2,072,985
Adjustment to Debt Service Restricted Account Contribution	<u>\$</u>	(179,884)

- (1) Per resonse to Div. 2-11.
- (2) Per RFC Schedule 2.

Adjustment to Capital Spending Requirements Rate Year Ended June 30, 2010

	 Total
Capital Spending in FY 2010 (1)	\$ 1,652,019
Capital Spending in FY 2011 (1)	 1,501,817
Average Annual Spending	\$ 1,576,918
Amount per Newport Water Filing (3)	 1,652,019
Adjustment to Capital Spending Restricted Account Contribution	\$ (75,101 <u>)</u>

- (1) Per RFC Schedule 5.
- (2) Per RFC Schedule 2.

Adjustment to Revenue Offsets Rate Year Ended June 30, 2010

	 Total
Cash Expenditures for Meter Replacements (1)	\$ 65,532
Portion allocable to Water Service at 50%	 32,766
Portion allocable to Wastewater Service at 50%	\$ 32,766

Note:

(1) Based on average of \$64,247 in FY 2010 and \$66,817 in FY 2011.

Calculation of Uniform Percentage Increase in Rates Required to Generate Additional Revenues Rate Year Ended June 30, 2010

<u>Customer Class</u>	E	ixisting Rate	Rate Year Sales (1) (1,000 gals)	Re	ate Year evenues at sting Rates
Retail Navy Portsmouth	\$ \$ \$	4.540 2.795 2.227	1,240,400 288,013 446,500	\$	5,631,416 804,996 994,356
Metered Sales Revenues at Existing Rates	;			\$	7,430,768
Type of Charge		Existing Charge	Number Billed (1)	Re	ate Year evenues at sting Rates
Billing Charge	\$	13.25	63,880		846,410
Fire Protection Charges (Public)	\$	752.00	999		751,248
Fire Protection Charges (Private) less than 2" 2" 4" 6" 8" 10" 12" Total Private Fire Service		14.76 62.00 382.00 765.00 1,751.00 2,891.00 4,642.00	- 1 57 246 62 - 2	-\$	62 21,774 188,190 108,562 - 9,284 327,872
Total Rate Year Reven	ues from	Existing Ra	ites and Charges	\$	9,356,298
Net F	Requirements (2)	\$	11,119,682		
		Additional F	Revenue Needed	\$	1,763,385
	%	Revenue In	crease Required		18.85%

⁽¹⁾ Per Schedule RFC 7.

⁽²⁾ Per Schedule TSC-1. Equals total cost of service less miscellaneous revenue.

Calculation of Proposed Rates and Proof of Revenue at Proposed Rates Rate Year Ended June 30, 2010

Customer Class Retail Navy	Existing		Percent Increase (1) 18.85% 18.85%	Proposed Rate \$ 5.396 \$ 3.322		Rate Year Sales (2) (1,000 gals) 1,240,400 288,013	Rate Year Revenues at Proposed Rates \$ 6,693,198 956,779	
Portsmouth		2.227	18.85%	\$	2.647	446,500		1,181,886
Metered Sales Revenues at Proposed Rates							\$	8,831,863
Type of Charge	Existing Charge		Percent Increase (1)	Proposed Rate		Number Billed	Rate Year Revenues at Proposed Rates	
Billing Charge	\$	13.25	18.85%	\$	15.75	63,880		1,006,110
Fire Protection Charges (Public)	\$	752.00	18.85%	\$	894.00	999		893,106
Fire Protection Charges (Private) less than 2" 2" 4" 6" 8" 10" 12" Total Private Fire Service		14.76 62.00 382.00 765.00 1,751.00 2,891.00 4,642.00	18.85% 18.85% 18.85% 18.85% 18.85% 18.85%	3	18.00 74.00 454.00 909.00 ,081.00 ,436.00 ,517.00	- 1 57 246 62 - 2		74 25,878 223,614 129,022 - 11,034 389,622
Total Private Fire Service							Ψ	
Total Rate Year Revenues from Proposed Rates and Charges							\$	11,120,701
	Net Rate Year Revenue Requirements (3)							11,119,682
						Difference	\$	1,019

- (1) Per page 1 of this schedule.
- (2) Per Schedule RFC 7.
- (3) Per Schedule TSC-1. Equals total cost of service less miscellaneous revenue.