CALIFORNIA PUBLIC UTILITIES COMMISSION
Water Advisory Branch

STANDARD PRACTICE FOR

PREPARING RESULTS OF OPERATION REPORTS

FOR GENERAL RATE INCREASE REQUESTS

OF WATER UTILITIES

OTHER THAN MAJOR COMPANIES

Standard Practice U-3-W

SAN FRANCISCO, CALIFORNIA
Revised November 1999

WATER UTILITIES BRANCH

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PURPOSE AND SCOPE

The purpose of this standard practice is to provide guidance to staff engineers and analysts in the preparation of Results of Operation (RO) reports for Class B, C and D water companies' General Rate Case (GRC) requests. This report format may also be used for certification or investigation reports. RO reports constitute the principal staff showing of the basis for determining reasonable rate levels by the Commission for small water companies and must be completed prior to entering into negotiations with the utility.

This Standard Practice provides the basic information needed to prepare a simple GRC analysis. As with all Commission work the aspects of analysis described in this document are subject to change, may not be appropriate in a particular instance or may be too simple to adequately answer the questions the Commission is addressing. The analyst or engineer is responsible for taking whatever action is necessary to prepare as sophisticated a report as is required to meet the assignment. The analyst or engineer is also responsible for taking into account all available and relevant information in preparing all staff reports. This is best done by maintaining an active dialog with your immediate Senior and Supervisor. In all instances where their advice and guidance differ from this Standard Practice, that advice and guidance shall govern.

GENERAL PROCEDURE

Each staff member working on a GRC is responsible for doing a comprehensive study of the utility's operations, investment, financing arrangements, plans for the future and relations with its customers, as assigned. All of these factors are a part of the RO report.

In dealing with small water company personnel, staff should always approach them in a friendly, helpful manner, avoiding any unnecessarily burdensome requests or directives where it is possible to do so and still properly exercise the Commission's jurisdiction.

Preparation of the report begins when the utility submits acceptable workpapers or, for outreach GRCs, when the staff member completes the workpapers. See U-9-W, Standard

Practice for Processing Informal General Rate Cases of Water Utilities for the steps in processing a GRC. Of the five to six months allotted for a GRC, the analyst has three months to complete the RO report itself. Each report will normally take about 160 to 240 working hours. If the situation is complex, the report may take more time. If you need additional time to prepare the report, inform your Senior and Supervisor of the reasons and the expected delay and inform the company representative and the Branch Chief of the new due date.

Information for writing the report comes from the utility's filing, historical information about the utility, the staff visit, the public meeting and written comments, and from data requests. Data requests can be made either by telephone or in writing to the contact person shown on the first page of the utility's workpapers. If data requests are made over the telephone, record that information in your workbook. Keep a copy of each formal data request and all responses in your workbook.

The objective of an RO report is to present information for the Commission and interested parties that summarizes the operations and earnings of the utility, that explains the evaluation done by the staff and that formalizes the recommended actions to the Commission. Often the RO report will be the only record of the methods used to determine reasonable rates. Thus the report should be as complete and professional as possible. A copy of the report and all workpapers must be filed by company name in the "Work Files" file cabinets in the storeroom, and an electronic version of the RO report must be made available to other staff by saving it as a DocsOpen document.

Each staff member shall keep his or her workbook in reasonable order, properly identified and indexed, in an appropriate binder or folder and reasonably available to the Senior or Supervisor. The workbook should include copies of information from prior rate cases when applicable. Please keep your workbook available in your workspace while working on the case in case someone needs to refer to it when you are absent. Don't lock it up in your file drawer.

This document will be revised and updated as necessary and those updates will be available in the Water Division Standard Practices folder on the office automation system.

REPORT CONTENTS

RO reports will follow the seven part format shown in Attachment A.

The report must include the names of the staff member(s) who wrote the report and the sections each person was responsible for, if applicable. Paragraphs shall be numbered sequentially throughout the entire report. Tables should be embedded in the report as much as possible. Charts and maps, however, may be at the end.

Section I, Introduction, and Section II, System Description, should be prepared as shown in Appendix A. The introduction should include a brief summary of the application and

any history that is necessary to allow the reader to understand the company and the evaluations made in the report. Section II should include a reasonably complete description of the system, the personnel who operate the system, other business interests of the owner and any other situations that exist today that bear upon the elements of the RO Report.

Section III, the Summary of Earnings, is the section in which the allowable revenues are calculated. The Summary of Earnings table in this section calculates the allowable annual revenues and thus determines the just and reasonable rates that the water company may charge. The revenues are calculated for a future test year under the anticipated operating conditions. Consequently the components that make up the rates are estimates. The purpose of a rate case is not to "make the utility whole" for incurred expenses, except for memorandum account and balancing account protection that was provided prospectively. The report should contain sufficient information and explanation to enable the Commission to set rates that will be reasonable in the near future to both the utility and its customers. Generally the staff should adopt the utility's estimate of expenses if the amounts are within 5% or the staff's estimate.

The following paragraphs provide an overview of the policy that applies to the preparation of the Summary of Earnings.

Estimating Expenses (General)

The engineer or analyst shall estimate the test year expenses for each category of expense applicable to the utility's operations. The Uniform System of Accounts (D. 85-04-076, April 17, 1985) specifies what expense items should be included in each account.

Initially, you should consider the expenses booked by the utility and shown on its annual reports. (If the utility hasn't filed one or more annual reports, you should halt the processing of the GRC until the reports have been filed.) These expenses should be verified by audit during the site visit. If the booked expenses seem too high or too low, you may start your estimate of reasonable expenses based on what was adopted in the last GRC.

There are many ways of estimating expenses. The analyst or engineer is free to use the most appropriate that is acceptable to the Senior and Supervisor.

If the operations of the utility have changed (more people have been hired, some employees have been promoted, work has shifted from contract to in-house) then you must modify the estimates in each account accordingly. Since these estimates must be forward-looking, take into account any changes in expenses that will occur in the test year (if new DHS requirements are expected, include enough in rates to cover them, etc.)

The following methods are all valid approaches to estimating expenses:

1) Constant dollar averaging

Method: Using the audited figures for the accounting category being estimated, escalate all amounts to test year dollars. Use the escalation rates provided by ORA and use the labor or non-labor figures as appropriate. Take the average of these amounts. The calculation is as follows:

Acct. 650 Contract Work

Year	Amount	Esc 90-91	Esc 91-92	Esc 92-93	Total
1990	5,243	1.0375	1.0450	1.03	5,855
1991	7,045		1.0450	1.03	7,583
1992	17,012			1.03	17,552

Total					30,960
Test Year 93 (average)				10,320	

2) Trending

Looking at the example above, the analyst might be concerned that $10,320 wouldn't be enough for contract work, since the utility spent over $17,000 in 1992. If the analyst felt sure that the increase in contract work would continue, the proper procedure might be to trend, rather than average. The disadvantage of trending is that while averaging will make the utility whole in the long run, trending may overshoot or undershoot the correct figure. Nevertheless trending is also a valid way of estimation. The correct approach to trending is to do a least-squares estimate for the test year. The procedure for trending is as follows:

Method: Using a spreadsheet program or regression program, become familiar with the "Regression Analysis" section. For trending, regress the amounts being trended (dependent variable) against year, number of customers or water delivered (independent variable) as appropriate. Using the example numbers given above the table will look something like this:

	A	B	C	D	E	F
1	5,855	1	Regression Output			
2	7,583	2	Constant		-1367	
3	17,552	3	Std. Err of Y Est.	3364.374		
4			R Squared	0.858031		
5			No. of Observations	3		
6			Degrees of Freedom	1		
7						
8			X Coefficient(s)	5848.5		
9			Std. Err of Coef.	2378.972		

The calculation for the fourth year (1993) is:

-1364 + 4 x 5848.5 = $22,030

3) Regression against multiple variables.

Sometimes an expense will logically depend on more than one thing. For example, office expense may depend on number of metered customers, total number of customers and time. If you feel comfortable with it, you may use regression against more than one variable to calculate estimates. Discuss this procedure with someone who is familiar with it first however. It's easy to make a mistake. Using this method, you might identify customer- related costs, facilities-related costs and production-related costs and scale the allowable expenses by the number of customers, total plant or water delivered.

4) Budgeting

Do an actual budget based on historical expenses as modified by expected future conditions. One common example of this approach is the practice of taking the actual regulatory costs for the GRC you are working on and allowing the utility to recover an identical amount over the next three years as an estimate of future regulatory expenses. Again, you are not paying the utility back for the costs of the rate case you are working on, but rather you are using those costs to estimate future costs.

5) Benchmarking

Compare the utility you are working on with other utilities that are similar. We do not do "comparative ratemaking", that is, we do not raise or lower rates just because an nearby utility has higher or lower rates, but your personal knowledge of small water companies and information gleaned from investigating similar recent GRCs can provide valuable insight for estimating reasonable expenses.

6) Consistency

It is also important that the estimates you develop are consistent. For example, you will derive certain adopted quantities, such as projected sales. Since the purchased power expense will be proportional to expected sales, you shouldn't average or trend past purchased power costs, but rather, starting from expected sales, calculate, based on pump efficiency and existing electric rates, the expected purchased power costs. This makes these two figures consistent.

<u>Contract Work, Office Salaries, Transportation and Rent</u>

One big problem in estimating expenses for some small water companies occurs in the area of affiliate transactions. Some small water companies are affiliated with a well drilling company, or the owner may also run a development company or construction business. You must be extremely careful to make sure the ratepayers are paying only for work done for the utility and are paying only reasonable charges for supporting activities such as contract work, especially when the work is done by an affiliated company.

By far the best protection is for the utility to get at least three competitive bids for all major contract work. If the utility doesn't, it should present some kind of proof that the charges were reasonable. Similarly if the utility employs relatives of the owner for office work, you should include all reasonable office salaries (don't reduce salaries just because the employee is a relative) but the utility should present some kind of evidence that the salary level is reasonable.

Normally we allow in rates any formal contract that the utility has signed such as a lease for rent, or a contract with a union for wages. As a matter of policy these contracts are generally considered reasonable. If you disagree with the reasonableness of these contracts you have the burden of proof that the utility signed the contract imprudently. Either the utility was conspiring with the company contracted with to charge higher than normal fees (see affiliated transactions above) or the utility was generally imprudent and allowed itself to sign a contract that was unreasonable, figuring it could just pass the costs on in rates. Imprudence usually means that the company did not follow normal managerial or negotiation techniques when it negotiated the contract. Higher than normal costs compared to other contracts for similar services in the same area can indicate imprudence also.

Transportation expense can be controversial if the owner is charging some or all of his (or his family's) automobiles to the utility. Similarly with rent, when the utility shares space or staff with the owner's other businesses. Often you will have to determine a "reasonable" expense base upon a similar utility's allowable expense to separate these costs out.

Management Expenses

Management Salaries are Account 671 and are described as "the portion of salaries of managers, owners, partners or principal stockholders of a utility chargeable to utility operations." This requires that the individuals whose salaries are being estimated must be owners or stockholders in the company, or designated as managers by their job title.

The most important item here is to be sure that the time spent by the manager is really chargeable to the utility's operations. Especially with smaller water companies where the managers have other interests, you must separate activities that assist the water company from those that promote the other interests of the owner. It is possible for an owner to delegate so much of the water company management to others that a management salary of zero is reasonable. Also remember that some part of the manager's (or an employee's) salary may be

classified as capitalized labor, because it adds to ratebase, and shouldn't be considered in calculating the management salary.

Management Salaries is an Administrative and General Expense and as such is not directly allocable to either plant or operations. As such you can't rely on any one parameter (such as number of customers or total plant) to use when scaling the management salary. Consequently management salaries are somewhat subjective, but even so they need to be factually based.

Past experience shows that we actually have few confrontations over management salaries. Commonly, the owner asks for a reasonably low salary because he is aware that his customers have a limit on what they can pay. If the owner has not requested a management salary at all, you can encourage him or her to do so.

In order to evaluate the proper management salary, you should get as good an idea as you can about what the manager actually does typically. A manager who is planning the expansion of the company's service territory, negotiating with developers, arranging for low interest loans and interviewing prospective employees probably deserves a higher salary than a manager who is reading meters and writing out bills, although each activity is a reasonable one for management.

A good source of this kind of information is copies of the appointment book, daily log or diary of the owner or manager. You should identify the individuals named in the notebook or appointment pad and call some of them to ask about what went on at the meetings. This "audit" approach to verifying utility documents is a valid regulatory activity and not an intrusion into the owner’s personal life, and verifying data should be a standard part of your approach to regulation.

You can also ask for copies of an owner's or manager's timecard or other internal salary tracking document. Remember, however, that the temptation when a person is working for both regulated and unregulated firms is to bill as much work as possible to the regulated firm. Since there is no real way of double-checking timesheets, this method of tracking work cannot be used in isolation.

The Association of California Water Agencies (ACWA) publishes a book of salaries paid by various government water agencies in California. This document can be a valuable source of reasonable salary level information. We have one available for reference.

Another source of information is recent RO reports done by other water branch engineers and analysts. As mentioned above generally you will find that management salaries as requested were found to be reasonable, but some reports will include the justification for the analysis that resulted in different levels.

. Naturally, everything else being equal, the larger the number of customers, the

higher the management salary level, because the job requirements are probably more sophisticated and complex. Also, running a six employee utility is more complex than running a two employee utility, again, all other things being equal. However, most often, all other things aren't equal. A company that "farms out" much of its management work to consultants or contract employees might not justify as high a salary as the owner-manager who does much of the work herself.

Customer satisfaction is also an important indicator of management capability. If the utility fixes leaks quickly, that indicates good management. Such indices as the location of the owner's home could have an impact, since absentee ownership is rarely as responsive as a concerned local owner who might even be providing water to his or her own household. The public meeting can give you an idea of the overall management quality. If customer complaints are being dealt with quickly and effectively, the manager is probably doing a better job than if problems languish for long periods. Overall rates are a factor as well. Prudent management can lower rates. If you believe that management has worked hard to keep overall rates low, a higher management salary might be appropriate.

Professionalism and certifications are also significant. If the owner has an operator's permit and has been active in professional organizations that relate to water service, her expertise and value to the customers probably exceeds that of the owner who has no particular qualifications or professional or regulatory knowledge. This information is available by conversation with the owner.

The quality of the management will have an impact on the salary level (as explained above), and it will also have an additional impact in that it might justify a higher allowed rate of return. This "double whammy" might at first seem to be unfair, but it is not. Part of the Commission's job is to substitute for the free market. In a competitive market, a utility that was run poorly would likely be unprofitable, and should pay its manager less. Conversely you should have no qualms about a utility paying an excellent utility manager what she is worth, and allowing a return near the high point of the range as well, to recognize excellent service.

Preparation of the management expense estimate begins with an evaluation of the amount requested in the filing. If the owner has not requested a management salary, you should encourage him or her to do so. Conversely, you may find that the owner is requesting what you may consider an exorbitant amount for management salary. This claim actually may make sense if the owner is making a profit and taking the profit out in salary, for tax purposes, instead of as dividends, since dividends are taxed twice[1]. For our purposes though, you should separate the owners' management salary estimate from the return on ratebase estimate and use a reasonable salary in the Summary of Earnings.

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[1] Corporate profits are taxed at the corporate tax rate. If any of the remaining profits (retained earnings) are distributed as dividends, those dividends are taxable to the recipient as personal income.

Most owners will be very happy to describe their system, the changes they have made and planned, and the troubles they have had. Listen carefully, both for the information you will get and for the evaluation you can do of the owner's knowledge and ability.

Talk also, during the site visit, to as many employees as possible about the quality of utility management. Even though most employees are very loyal, they will still have opinions and desires that they have not satisfied. As with all verbal evidence, you should *never* rely on just one item or assertion. Claims and opinions must be verified by some factual or corroborating evidence before they are ever used in determining rates.

Regulatory Expenses

In accordance with usual practice we allow the utility to recover actual regulatory expenses for processing a GRC over three years as an estimate of the next GRC cost. Because the small water GRC procedure was created to try to minimize costs, you should avoid including regulatory expenses for meetings with staff, arguments and appeals that the utility makes in an attempt to increase its rates over what the staff finds reasonable. However if the utility "wins" the appeal, than the expense is reasonable. This rule gives the utility the proper incentive to look closely at the areas with which it disagrees and to see whether it is worth appealing them. If we didn't have this limitation, the utility or consultant would have the incentive to automatically appeal everything, since those extra costs would become part of the revenue requirement.

All other regulatory expenses should be included in rates, including postage and advertising expense for notices, rent for public meetings, etc. All costs of notice and compliance with Department of Health Services requirements should also be allowed. Generally, anything we or DHS impose on the utility should be funded in rates. Only if these expenses are impossible to estimate should they be recovered using a memorandum account.

Dues, Fees and Contributions

Small water companies can be members of various professional organizations: California Water Association, American Water Works Association, National Association of Water Companies, etc. To the extent that participation helps the ratepayer, by making the owner or employees more knowledgeable, these costs should be allowed. For class B companies you should disallow the percentage of the association's budget that is used for lobbying or other non-educational activities, just as we do for Class A companies. For class C and D water companies probably no part of CWA or AWWA dues are really used for lobbying for the small companies. For those companies you should include 100% of CWA dues and dues for other associations if the amount isn't too high and if the utility employees are actively involved so that the ratepayers get something for their investment.

All franchise fees that the utility has to pay as a normal business expense should be included in rates, but they may require special treatment. If a municipality imposes a fee as a

utility tax, the Commission has held that this should be listed separately on the bill, not hidden in rates, and should be paid by only those ratepayers that live within the municipality. This requirement for separate listing continues until surrounding municipalities or counties have raised similar fees to approximately the same level. This may be applicable to small companies if their billing system is sophisticated enough to do it, but is not required.

Charitable contributions are not allowed in rates. The Commission has held that if ratepayers want to contribute to a charity they can do so themselves. Any contributions the utility makes should come out of return on ratebase.

Depreciation

Calculating depreciation can be a profession all its own. The Commission uses the straight-line remaining life method of calculating depreciation. This means that an item which cost $100 and is initially thought to have a 10 year life would undergo depreciation of $10 per year. If after 5 years ($50 remaining value) the Commission determined that the item had 8 years of remaining life instead of five, the depreciation over the last eight years would be $6.25 per year. The actual depreciation is included in rates as depreciation expense. The accumulated depreciation is subtracted from the original cost of the item to get the amount that is included in rate base.

Standard Practice No. U-4-W describes the steps you should use to figure the allowable depreciation. Land, water rights, etc. are not depreciable.

For small water companies we sometimes use a flat 2.5% depreciation rate on total plant in service. This means that we believe that the average life of all of the facilities is 40 years. Some utilities may be able to justify a faster depreciation (greater than 2.5% per year). If the Commission has adopted a higher or lower depreciation figure in a previous rate case, that percentage should apply unless a new depreciation study is done.

Obviously the depreciation used by the Commission and the depreciation used for income tax are not at all the same. You may have to explain this difference to the utility or the utility's accountant. For the larger utilities the difference between the taxes paid using tax (accelerated) depreciation and the Commission's straight-line depreciation can be significant. For these large companies the Commission "normalizes" this difference. This means that the utility books the difference between the taxes used for ratemaking and the taxes actually paid to an account (called the Deferred Tax Reserve Due to Depreciation account). The amount in this account is subtracted from working cash and results in a reduction in rate base. In this way the ratepayers get something back for the timing difference between ratemaking income taxes and income taxes actually paid. We normally do not bother normalizing taxes for class C and D utilities, because additions to plant, hence new depreciation expense, are not usually inform throughout a 12 month period, or even over 2-3 years, but it should be done for class B companies.

Calculating Ratebase

Determine Plant in Service by determining the original cost of the property to the person or entity first devoting it to public utility service. If the utility's records do not properly represent such original cost, it will be necessary to adjust the booked costs or to request that the utility have an original cost appraisal made. In the case of class D utilities the engineer or analyst may make such an appraisal and reserve study if approved by the Supervisor. Where an earlier appraisal has been made, that appraisal should form the starting point for the inclusion of subsequent plant improvements, additions and retirements.

If facilities have been acquired by purchasing an existing mutual or municipal utility, the law requires that the Commission use purchase price for ratebase. The difference between the purchase price and the depreciated cost is entered as an "acquisition adjustment" and amortized above the line.

Ratebase is the net dollar investment of the utility. It is calculated by taking the Plant in Service, subtracting the accrued depreciation (depreciation reserve), deferred tax reserve (if any), contributions and advances, and adding working cash and materials and supplies (M&S). Plant in Service is original cost of all used and useful plant. Accrued depreciation is the sum of the depreciation expense booked each year at that year's depreciation rate. Working cash is calculated using the method in the Wesley's Franklin' Memo of January 25, 1988. M&S is estimated by the engineer or analyst based upon the utility's actual operating needs.

Rate Base ordinarily contains the following items, with appropriate adjustments or estimates:

Original Cost of Organization, Franchises, Water Rights and other Intangibles
Original Cost of Land that is used and useful for utility service
Original Cost of Depreciable Properties that are used and useful for utility service
Reasonable Allowance for Materials and Supplies
Allowance for Working Cash
Less: Contributions in Aid of Construction
Less: Unrefunded Advances
Less: Depreciation Reserve
Less: Deferred Tax Reserve (if any)

Income Taxes

Income taxes are calculated on a pro-forma basis by applying the applicable tax rates to the utility's net revenue based on straight-line depreciation.

Determining Rate of Return

The Audit and Enforcement Branch of the Water Division will provide you with the latest values of allowable Rate of Return on equity (ROE) for each class of water company. For class C and D utilities this value will have a range of 50 basis points (one basis point is .01%) such as 13.8% to 14.3%. You should chose a value from this range based upon your best determination of the quality of service the utility is providing. If the utility is doing a good job of meeting the needs of its customers, it should receive a return near the high end of the range. If the utility responds poorly to customer complaints and is not meeting its public utility obligations, it should receive the minimum allowable return. For Class B utilities the Audit and Enforcement Branch will determine a reasonable ROR.

If the utility is financed in part by long term debt, the situation is more complicated. You need to determine the capital structure, which is considers the percentage of equity that is financing the company and the percentage of debt. For large utilities the capital structure normally ranges from 40% investment and 60% debt to about 60% investment and 40% debt.

After you have determined the capital structure, you multiply the percentage of debt by the actual average cost of debt and the percentage of capital by the reasonable return on equity and add these two quantities to get the rate of return on ratebase. For example, assume a 70% equity, 30% debt class B utility is paying an average of 9% on its debt. Finance Branch informs you that the return on equity should be 11%. The rate of return is:

weighted cost of equity	.70 x .11 = .077
+ weighted cost of debt	.30 x .09 = .027
	----
rate of return	.104 = 10.4%

If the utility capital structure were 100% equity the ROR would equal the ROE and be 11%.

Operating Ratio

In addition to calculating return on ratebase, you need to make an estimate of the margin that the company would get if it received 20% of its total operating and maintenance expenses as "profit." If this figure exceeds the sum of return on ratebase and depreciation expense, give the utility this amount instead. This recognizes the fact that a utility may have a very small ratebase, therefore a rate of return not commensurate with it operating expenses. If the figure derived using 20% is too low, a higher percentage may be used.

Calculating the Net-to-Gross Multiplier

The net-to-gross multiplier is calculated by taking the reciprocal of one minus the total of uncollectibles, franchise tax rate and state and federal income tax rates.

Estimating Revenues

Once you have determined the reasonable expenses and depreciation, calculate the return by multiplying the ROR by the ratebase. Using these figures, you can now calculate the revenue requirement. Simply multiply the return by the net to gross multiplier, add the expenses and depreciation and you have the revenues.

RATE DESIGN

A percentage of the fixed costs (costs that don't vary with water use) is used to calculate the service charge. For Class D companies the percentage is 100%, for class C companies it is presently 65%. The rest of the revenues are included in the quantity charge. Service charges are scaled by the capacity equivalent of the service connection.

The detailed procedures for classifying and calculating rates are discussed in Standard Practice U-20, "Guide for Use in Preparing Cost of Service Studies of Water Utilities". Any change in the utility's current rate structure should be tempered by considering the impact on the customers at various usage levels. One desired attribute of rate design is rate stability so new rate designs are usually phased-in. The standards for this are that no customer should receive over 200% of the system average rate increase and that the rate increase is usually held to 100% increase in the first test year, with the rest being made up in a second test year.

For metered rates, the service charges should be adjusted using the current service charge allocation ratios as outlined in U-20. All adjustments should be rounded to the nearest cent.

SERVICE, FIELD VISIT, NOTICE AND PUBLIC RESPONSE

Branch policy requires a field investigation of the applicant's system and service area before the RO report is finalized. This gives the staff a chance to review the operation of the water system, inspect the company's records and talk to the employees and customers. Branch also requires a public meeting. At the public meeting the utility should describe the need for the increase and staff should discuss the ratemaking process. Staff should not commit to any request made at the public meeting, except a request for a copy of the final staff report, but keep good notes and carefully review all requests and information. Discuss any service problems with the utility and, if necessary, require a follow-up report on the resolution of these problems.

The Branch requires compliance with G.O. 96-A with respect to Notice. When the utility's filing is complete, the utility mails a notice of the rate increase and the time, date and place of the public meeting to each customer. A subsequent notice is required when the rate case is completed and the new rates go into effect.

Check with the Consumer Affairs Branch of the Public Affairs Division on

complaints. Check the correspondence file for the utility for letters we have received. Discuss in the RO report the number and types of letters Branch received after the notice was published and how you dealt with them.

Check out a pressure meter before you make your field trip and compare the tested pressures to G.O. 103. Discuss any pressure or other service problems with the utility.

COMPLIANCE

Check the Compliance Report to see if there are any outstanding compliance items. All items must be cleared, or an acceptable plan must be proposed, before any rate increase can be allowed.

As mentioned before, the utility must file annual reports. If any annual reports haven't been filed, the utility must file them prior to receiving a rate increase.

RECOMMENDATIONS

The recommendations may be just standard boilerplate, but if there are any special requirements, they should be spelled out clearly. Examples include:

Filing of up-to-date rules, current service area maps, and sample forms.
Installation of metering devices on sources of supply.
Refunding of any overcharges or billings at non-tariffed levels.

Once you have completed all sections, provide the draft report to the Supervisor for review. After the report has been approved, forward it to the Branch Chief, change your DocsOpen security on the document to All DocsOpen Users, Read Only, and put a hard copy version in the files.

Appendix A

California Public Utilities Commission

Commission Advisory and Compliance Division

Water Utilities Branch

STAFF REPORT ON THE ADVICE LETTER GENERAL RATE INCREASE OF ANY WATER COMPANY

Report written by

I. M Goode
Assistant Utilities Engineer
October 199_

Appendix A

I. INTRODUCTION

Any Water Company (AWC), filed a Advice Letter 13-W with the Water Utilities Branch (Branch) on August 5, 199_. AWC requested authority under General Order 96 and Section 454 of the Public Utilities (PU) Code to increase rates for water service by $12,330, or 112.46%. The purpose of the rate increase is to recover mounting operating expenses and costs relating to plant improvements. AWC's request shows that 199_ gross revenues of $10,964 at present rates would increase to approximately $23,294 at proposed rates, allowing a rate of return on rate base of 4.76%. AWC serves approximately 62 flat rate, and 10 metered rate customers in its service area in and around the community of Any City, Sierra County.

The current rates were established on August 24, 1926 pursuant to Resolution No. W-____ which authorized an increase in revenue of $7,100 or a general rate increase of 121.7%.

II. SYSTEM DESCRIPTION

AWC is a corporation owned by John M. Smith serving approximately one square mile of territory located in the foothills of the Verygreen National Forest. The utility's administrative and operations staff consists of John M. Smith, Manager and Operator and June Smith, Office Secretary. Thirty five of the seventy two customers in the service area are part-time residents, while the remaining customers are moderate to low income families who reside there year around. The system has lost four customers over the past three years but the Branch believes that this decline has stabilized. AWC may have an opportunity to connect two other systems to the current facilities. These systems are located on either side of the utilities service area, and, if inter-connection is made, the utility will have an additional 14 customers.

AWC's water source is a natural spring that flows out of the side of the mountain. The utility pipes the water about 400 feet down the hill to two filtration tanks. The first tank uses a ten micron rated filter bag to remove any impurities in the water. The second tank contains a five micron rated filter bag for further purification. The water then flows about thirty feet to a 5,000 gallon redwood storage tank. The utility is currently installing an additional 6,500 gallon steel tank to supplement the current storage and to more closely meet the Department of Health Services' (DHS) Waterworks Standards. There is no meter at the water source; however, through monitoring, AWC estimates the spring can deliver about eighty gallons per minute (gpm). Because there have been no apparent water outages in the system, it is assumed that the combination of source and storage capacity is adequate. AWC is seeking new water sources. The system does exhibit sub-standard pressure in homes near the storage facilities. The utility is placing additional storage to alleviate this problem. Most of the distribution system consists of two inch pipe installed in the early nineteen hundreds. AWC is working to update the system to meet current standards of design and construction as outlined in General Order 103. The system is not looped and contains three dead ends that Mr. Smith flushes twice a year.

About 2,000 feet of the distribution mains run underneath State Highway XX. Since this system is in a logging area, trucks running on the highway often cause breaks in the lines, due to their heavy loads. The cost of relocating these lines is about $22,000. Because this amount will increase AWC's rate base by more the twenty-five percent, Mr. Smith is seeking Commission authority to make the improvement. Mr. Smith has a unique opportunity to split the cost of the replacement with the area fire department. By using a dual trench both AWC and the fire department can substantially reduce the cost of the project, thus easing the burden on ratepayers. Without the necessary replacement the system runs the risk of costly repairs and possible water outages for extended periods of time.

III. SUMMARY OF EARNINGS

The Branch made an independent analysis of AWC's summary of earnings for the test year 199_ as seen in appendix A. The appendix illustrates AWC's and the Branch's estimates for the 199_ test year operating revenues, operating expenses and rate base at both present and proposed rates.

The Branch analyzed each operating expense category listed in appendix A. The Branch's estimate differs with AWC's estimates in contract work, transportation, insurance, employee pensions and benefits, professional services, regulatory commission expense and taxes other than income.

AWC's system is entirely gravity operated, therefore the Branch agrees with the utility's estimate for purchased power.

The utility estimates test year materials expense by averaging the past two years' data. Due to inadvertent accounting discrepancies in this category the Branch was unable to compute a three year average. The Branch reviewed AWC's materials expense account for 199_ and discovered additional errors. The Branch notes that the account contains expenses that should either be included as a rate base item under material and supplies, or that are inappropriate expense items. The Branch believes its estimates is more reliable because it removes the utility's accounting errors and uses actual 199_ data.

AWC's and Branch's estimates for contract work differ. The utility hires an individual to clear snow blocking the access road to the storage and filter location during the winter months. The utility did not include this expense in any account. AWC also did not include water testing costs in its estimate. The Branch includes both these expenses in its contract work category and thus believes its estimate is more accurate.

The utility's estimate for the other plant maintenance category is inconsistent with the three year recorded average. The Branch has reviewed this estimate and believes it is accurate because existing accounts contain all other expenses for the test year.

The utility's bases its office supplies and expense category estimate on projected costs. The three

year average is inappropriate due to inadvertent accounting errors. Specifically, the utility occasionally booked costs associated with organizational dues to this category. AWC correctly removed these costs for the test year estimate, therefore, the Branch believes the utility's estimate is reasonable.

AWC's estimate for office services and rentals is the costs for a room in the Smith's home dedicated for utility use. Furthermore, the basement of the Smith home serves as a storage area for AWC's inventory. The Branch believes this estimate is justifiable because it is based on actual square footage, and reasonable per square foot charges.

Office salary and Management salary estimates by AWC cover time spent operating and maintaining the utility. The Branch has reviewed the estimates and believes they are reasonable.

AWC's transportation expense estimate uses 199_ recorded and 199_ expected costs. The Branch's estimate differs in that the utility included the cost of insurance for the vehicle. Moreover, some estimated expenses are non-recurring, thus the Branch amortized these expenses over three years. The Branch feels its estimate is more accurate due to the utility's bookkeeping errors.

The utility's test year insurance estimate is the 199_ recorded cost for property and general liability. The Branch also used 199_ recorded costs but added the cost of vehicle insurance to its estimate. The Branch believes its estimate is more accurate because it adheres to the current Uniform System of Accounts (USOA) guidelines.

The utility used payroll taxes as an estimate for the employee pension and benefits expense category. The Branch removed this inadvertent bookkeeping error for its estimate and thus believes its estimate is reasonable.

AWC used the cost of accounting and bookkeeping and the cost associated with filing the rate increase request as its estimate of professional services. The utility also used 199_ recorded data. The Branch removed the costs of filing for the rate increase and used 199_ recorded data for the other expenses. The Branch feels its estimate is more plausible because of the utilities accounting error.

The Branch used the utilities recorded expense for filing this rate increase request as its estimate for the regulatory commission expense. The Branch spread this cost over three years. Since the utility placed this expense in the professional services category the Branch believes its estimate is reasonable.

The utility's general expense estimate uses the cost of 199_ membership dues to various water organization. It is inconsistent with the three year average; however, the Branch has reviewed the estimate and considers it reasonable.

The Utility's estimate and the Branch's estimate for taxes other than income differ in that the utility included additional property tax on land purchased in 1989. After the investigation the Branch learned that the current county property tax bill includes tax on this property. The Branch used the current tax bill and the payroll tax calculation as its estimate for this expense and thus considers this estimate sound.

The Branch helped the utility determine an accurate estimate for depreciation expense and average depreciation reserve. The Branch's investigation and calculation is attached as Appendix E.

AWC's summary of earning submitted with its rate increase request shows a rate of return on rate base of 4.76%. The Branch's recommended revenue increase will produce a rate of return of 7.77%, below the 13.9% and 14.4% standard rate of return range recommended by the Finance Branch of the Commission Advisory and Compliance division for small, 100 percent equity financed water utilities. The utility requested the rate increase be limited to 100 percent for all classes of ratepayers. The utility realizes that the new rates will not generate the authorized return on rate base.

IV. RATE DESIGN

The utility's current rate structure consists of two schedules: Schedule No.1, General Metered Service, Schedule No. 2, Residential Flat Rate Service. The Metered Service Schedule contains one rate block for all water quantity sold.

The Branch helped the utility in the rate design process and thus no differences exist. The new rate schedules can be seen in Appendix B. The Branch applied a 100 percent increase to the flat rate schedule, the 3/4 inch readiness to service charge and the water quantity charge. The remainder of the metered rate service charges are adjusted using the current service charge allocation ratios as outlined in the GO-96 Industry Rules. All adjustments are rounded to the nearest cent. Because almost all of AWC's operating expenses are fixed costs, and most of the customers use the flat rate schedule, the Branch did not apply the one hundred percent of fixed costs policy for metered service charges when designing rates. Additionally, the Branch discovered four flat rate customers being charged rates that are not in the flat rate schedule and corrected for this oversight.

V. SERVICE, FIELD VISIT, NOTICE AND PUBLIC RESPONSE

Branch staff members A. Perfect and I. Goode conducted a field investigation of AWC's system and service area on August 28 and 29, 199_. Mr. Smith directed a tour of the service area and explained the operation of the water system. Ms. Smith made the company's records available for inspection and provided other assistance. Sally Jones, AWC's Accountant, provided additional expense information after the public meeting.

The utility mailed a notice of the proposed rate increase to each customer on August 9, 199_. Over the past three years, the Consumer Affairs Branch of the Public Affairs Division received no complaints regarding the AWC system. The Branch received four letters of complaint regarding the proposed rate increase. The complaints dealt mainly with the amount of the increase, citing a similar rate increase three years ago, but others claimed that part-time residents receive unfair treatment. All letters were responded to.

On August 28, 199_ the Branch held an informal public meeting in AWC's service area. A. Perfect, Senior Utilities Engineer, explained Commission rate setting procedures and Mr. Smith explained the need for the rate increase. Mr. Wrainey Storm, and Ms. Pat Hand of the State Office of Drinking Water (ODW), attended to answer any questions regarding water quality and service. They spoke about the new monitoring requirements imposed by the State and the impact these regulations would have on AWC.

Of the twenty one ratepayers present, ten spoke out during the meeting. All stated they are satisfied with the water quality and service, and commended Mr. Smith on the job he was doing. Most of those who spoke said they felt part time users should not pay the same rate as full time residents. Additionally, most customers thought rates are getting too high, or that Mr. Smith may be making unnecessary investments.

Pressure tested in the area ranged from 18 psi at the higher elevations of the system to 165 psi at the lowest end of the system. Mr. Smith has installed pressure reducers in those homes that exceed current standards.

AWC is violating two provisions of G.O. 103. Section II.3.a. states that the utility shall maintain normal operating pressures of not less than 40 p.s.i.g, and not less than 30 p.s.i.g at times of peak seasonal loads. Certain residents at the higher elevations receive only 18 to 20 psi. Section II.4.a of G.O. 103 states that the utility shall install a suitable measuring device, or otherwise determine the production at each source of supply. At this time AWC is unable to determine its water production. Mr. Smith is currently working on solving the low pressure problem by installing a supplemental storage tank at a higher elevation. The Branch recommends AWC install a meter or otherwise devise a method to measure the production capacity of the water source.

VI. COMPLIANCE

There are no outstanding Commission orders requiring system improvements.

The utility has been filing annual reports as required.

RECOMMENDATION

The Branch recommends that the Commission authorize an increase of $12,042 or 107.02%, which would increase estimated annual revenue from $11,252 at present rates to $23,294 at

adopted rates. A residential flat rate customer would realize an increase on a monthly bill from $12.00 to $24.00, or 100%. This increase will produce a 7.77% return on rate base.

Proposed Findings:

After investigation by the Branch:

a. The Branch's recommended Summary of Earnings (Appendix A) is reasonable and should be adopted.

b. The rates recommended by the Branch (Appendix B) are reasonable and should be authorized.

c. The quantities (Appendix D) used to develop the Branch recommendations are reasonable and should be adopted.

d. The Branch recommends that a meter be installed at the water source or other means of measuring the production capacity as required be Section II.4.a of G.O. 103, and AWC be allowed to file for an offset rate increase to recover costs upon completion of the project.

e. AWC be allowed to make the 2000' main replacement and file for an offset rate increase to cover costs and reflect the new rate base.

f. Any offset rate increase the request be analyzed using an 11.00% return on investment.

APPENDIX A
Any Water Company, Inc.
Water Division
Summary of Earnings
Test Year 1999

Item	Utility Estimated Present Rates	Utility Estimated Requested Rates	Branch Estimated Present Rates	Branch Estimated Requested Rates	Recommended Rates
Operating Revenue					
Metered	$ 61,856	$ 82,551	$ 68,017	$ 82,405	$ 61,400
Operating Expenses					
Purchased Power	$ 8,370	$ 8,370	$ 8,370	$ 8,370	$ 8,370
Employee Labor	9,428	9,428	-	-	-
Materials	5,195	5,195	5,025	5,025	5,025
Contract Work	1,596	1,596	1,596	1,596	1,596
Transportation	2,397	2,397	1,403	1,403	1,403
Other Plant Maintenance	172	172	172	172	172
Office Salaries	4,188	4,188	2,465	2,465	2,465
Management Salaries	12,570	12,570	11,975	11,975	11,975
Employee Pension & Health Benefit	2,633	2,633	1,793	1,793	1,793
Uncollectibles	354	354	170	206	154
Office Services & Rent	494	494	494	494	494
Office Supplies	1,930	1,930	1,930	1,930	1,930
Professional Services	1,417	1,417	1,294	1,294	1,294
Insurance	1,380	1,380	1,877	1,877	1,877
Regulatory Expenses	1,250	1,250	748	748	748
General Expenses	430	430	430	430	430
Subtotal	$ 53,804	$ 53,804	$ 39,743	$ 39,779	$ 39,727
Depreciation	6,984	6,984	4,440	4,440	4,440
Property Taxes	3,334	3,334	829	829	829
Payroll Taxes	2,232	2,232	1,392	1,392	1,392
Income Tax	267	3,647	4,866	8,097	3,380

Total Deductions	$ 66,621	$ 70,001	$ 51,270	$ 54,537	49,768
Net Revenue	$ (4,765)	$ 12,550	$ 16,747	$ 27,868	$ 11,632
Rate Base					
Average Plant	$177,538	$177,538	$ 167,238	$167,238	$ 167,238
Ave. Accumulated Depreciation	89,054	89,054	85,414	85,414	85,414
Net Plant	$ 88,484	$ 88,484	$ 81,824	$ 81,824	$ 81,824
Plus Working Cash	4,489	4,489	3,312	3,315	311
Materials and Supplies	-	-	1,000	1,000	1,000
Rate Base:	$ 92,973	$ 92,973	$ 86,136	$ 86,139	$ 86,135
Rate of Return	-5.13%	13.50%	19.44%	32.35%	13.50%

APPENDIX B

Any Water Company, Inc.
Water Division
Schedule No. 1

GENERAL METERED SERVICE

APPLICABILITY

Applicable to all metered service.

TERRITORY

Rolling Green Terrace and vicinity, adjacent to Highway No. 395, located approximately one mile northwest of Big Pine, Inyo County.

RATES

	Per Meter Per Month	
Quantity Rates:		
All Water, per 100 cu. ft.	$ 0.20	(R)
Service Charge:		
		(D)
For 3/4-inch meter	$ 16.40	(I)
For 1-inch meter	27.15	(I)

The Service Charge is a readiness-to-serve charge which is applicable to all metered service and to which is to be added the monthly charge computed at the Quantity Rates.

SPECIAL CONDITIONS:

1. All bills are subject to the reimbursement fee set forth in Schedule No. UF.

APPENDIX C
Page 1

Any Water Company, Inc.
Water Division
ADOPTED QUANTITIES
Test Year 1999

Expenses:	**Per Year**
1. Purchased Power:	
Southern California Edison Company	
Quantity	65,388 Kwh
Average Cost per Kwh	$ 0.1280
Total Purchased Power	$ 8,370
2. Purchased Water	None
3. Payroll:	
Labor	None
4. Ad Valorem Taxes:	
Tax Rate	1.001216%
Assessed Value	$82,824
Total Tax	$829
5. Service Connections:	
Meter Connections	251
Flat Rate Connections	None
6. Water Sales(ccf)	59,989

California Corporate Franchise
Rate : 8.84%

	Item	State Tax 1999	Federal Tax 1999
1	Operating Revenue	$	$
2	Operating Expenses	$ 61,400	$ 61,400
3	Property Taxes	$ 39,727	$ 39,727
4	Payroll Taxes	$ 829	$ 829
5	Depreciation	$ 1,392	$ 1,392
6	Taxable Income for CCFT	$ 4,440	4,440
7	State Tax, $800 minimum	$ 15,012	$
8	Taxable Income for FIT	1,327	$ 1,327
9	Federal Income Tax		$ 13,685
10	Total Tax	$	$ 2,053
		1,327	2,053

APPENDIX D

Any Water Co., Inc.
Water Division
Escalation Factors

l. Office of Ratepayer Advocates: Estimate of Non-Labor and Wage Escalation Rates for 1998 through 2000 from the August 1998 DRI/McGraw-Hill Review of U.S. Economy, dated August 31, 1998

2. ORA August 1998 Summary of Compensation Per Hour, dated August 31, 1998.

Appendix A