
**PUBLIC UTILITY COMMISSION
OF OREGON**

UW 136

**STAFF TESTIMONY
OF**

KATHY MILLER

**In the Matter of
CHARBONNEAU WATER COMPANY LLC
Request for a General Rate Increase.**

January 19, 2010



Oregon

Theodore R. Kulongoski, Governor

Public Utility Commission

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January 19, 2010

Via Electronic Filing and U.S. Mail

OREGON PUBLIC UTILITY COMMISSION
ATTENTION: FILING CENTER
PO BOX 2148
SALEM OR 97308-2148

**RE: Docket No. UW 136 – In the Matter of CHARBONNEAU WATER COMPANY LLC.
Request for a General Rate Increase.**

Enclosed for electronic filing in the above-captioned docket is the Public Utility Commission's Staff Testimony.

/s/ Kay Barnes

Kay Barnes

Regulatory Operations Division

Filing on Behalf of Public Utility Commission Staff

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Email: kay.barnes@state.or.us

c: UW 136 Service List (parties)

CASE: UW 136
WITNESS: Kathy Miller

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 100

Direct Testimony

January 19, 2010

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS**
2 **ADDRESS.**

3 A. My name is Kathy Miller. My business address is 550 Capitol Street NE, Suite
4 215, Salem, Oregon 97301-2551.

5 **Q. PLEASE DESCRIBE YOUR RELEVANT WORK EXPERIENCE.**

6 A. I have been with the PUC since 1987 and have participated in water utility
7 dockets involving rate filings, finance applications, property dispositions,
8 exclusive service territory, adequacy of service, water and wastewater
9 rulemakings, formal complaints, and affiliated interest matters.

10 **Q. DID YOU PREPARE ANY EXHIBITS FOR THIS DOCKET?**

11 A. Yes. Staff/101 contains the following documents in support of Staff testimony:

12	CWC Letter Dated November 19, 2009	Staff/101, pages 1, 2
13	Revenue Sensitive Costs	Staff/101, page 3
14	Plant and Depreciation	Staff/101, pages 4, 5, 6
15	Revenue Requirement	Staff/101, page 7
16	Summary of Staff Adjustments	Staff/101, page 8
17	Rate Design	Staff/101, page 9

18
19 **Q. HOW IS YOUR TESTIMONY ORGANIZED?**

20 A. Staff testimony is organized as follows:

21 Issue 1: CWC Description and Regulatory History
22 Issue 2: CWC's Proposed Filing
23 Issue 3: Staff's Analysis of the Company's Filing
24 Issue 4: Staff's Adjustments
25 Issue 5: Customer Concerns
26 Issue 6: The Stipulated Revenue Requirement and Rates
27
28
29

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

2 A. Staff testimony introduces and supports the Stipulation agreed to by the parties
3 in Docket UW 136.

4 **Q. WHO ARE THE PARTIES IN THIS DOCKET?**

5 A. The parties in this docket are: Charbonneau Water Company LLC (CWC or
6 Company), Commission Staff (Staff), and the following interveners: Steve
7 Chinn, Larry Kriegshauser, Dennis Jablonski, Don Mason, and Susie Stevens
8 (Parties).

9 **Issue 1: A Description and Regulatory History of CWC**

10 **Q. PLEASE DESCRIBE CWC.**

11 A. CWC was formed in May 2008 as a subsidiary of Charbonneau Golf Course,
12 Inc. (Golf Course). CWC's purpose is to provide nonpotable, irrigation water to
13 14 customers. The customers include 12 homeowner associations (HOAs) with
14 roughly 873 residential members, the golf course, and the country club.

15 The water system was originally constructed by Willamette Factors, a
16 division of Benjamin Franklin Bank. It was purchased in 1990 by certain, but
17 not all, residents. The Golf Course provided irrigation water to the customers
18 prior to the formation of CWC.

19 **Q. PLEASE EXPLAIN HOW CWC BECAME A RATE-REGULATED PUBLIC**
20 **WATER UTILITY?**

21 A. On April 24, 2009, CWC petitioned the Commission requesting rate regulation.
22 The Commission asserted jurisdiction pursuant to ORS 757.005 and

1 ORS 757.061 in Order No. 09-171, dated May 13, 2009. CWC filed proposed
2 tariffs and an application to increase rates on July 28, 2009.

3 **Q. DID CWC FILE FOR INTERIM RATES?**

4 A. Yes. CWC requested interim base rates and a change in its billing cycle.

5 After discussion with the Company and several customer representatives at
6 its regular public meeting on August 25, 2009, the Commission issued
7 Order No. 09-348. The Order suspended CWC's proposed rates, denied the
8 interim base rates, and adopted an accelerated billing schedule. Because
9 CWC had historically billed customers the year after the water was delivered,
10 the Commission adopted an accelerated billing design in which CWC will
11 collect for 2009 usage during the first four months of 2010. This will bring water
12 delivery and collection of payments current by May 2010.

13 **Issue 2: CWC's Proposed Rates**

14 **Q. PLEASE DESCRIBE CWC'S REQUEST FOR AN INCREASE AS STATED**
15 **IN ITS APPLCIATION.**

16 A. In its application, CWC is requesting a 91 percent increase in annual revenues
17 or \$140,897, resulting in total annual revenues of \$295,697, with an 8.9 percent
18 return on a rate base of somewhere between \$903,718 to \$941,905. The
19 Company's rate base was not consistent in its application.

20 **Q. PLEASE DESCRIBE THE COMPANY'S CURRENT RATES.**

21 A. The Company charges a commodity rate of \$1.35 per unit. One unit is equal to
22 748 gallons. CWC does not currently charge base rates.

1 **Q. PLEASE DESCRIBE THE COMPANY'S PROPOSED RATES.**

2 A. To achieve its proposed revenue requirement, CWC proposed a \$0.10 increase
3 to the commodity rate from \$1.35 per unit to \$1.45 per unit to be billed during
4 the irrigation season (approximately April to September depending on weather).

5 In addition, CWC proposed adding base rates as shown below to be billed
6 12 months per year.

7 **TABLE 1– CWC'S PROPOSED BASE RATES**

Meter Size	Proposed Base Rate
1 inch	\$32.34
1 ½ inch	\$64.68
2 inches	\$103.49
3 inches	\$194.03
6 inches	\$646.76

8

9 **Q. WHAT REASONS DID THE COMPANY GIVE FOR SEEKING A RATE
10 INCREASE?**

11 A. According to CWC, the increase is necessary to manage ongoing repairs,
12 maintenance, and preventative measures to ensure continued delivery of
13 water. More detail of CWC's increase request is provided as Attachment A to
14 the testimony.

15 **Q. WHAT IS THE IMPACT OF CWC'S PROPOSED BASE RATES UPON THE
16 CUSTOMERS?**

17 A. The table below shows the effect of the Company's proposed base rates on
18 each customer, specifically it shows the approximate monthly cost for each
19 HOA and its individual residences.

20

1

TABLE 2– CWC’S PROPOSED RATE IMPACT ON CUSTOMERS

		# of Meters	Meter Size in Inches	Proposed Base Rate Per CWC	Total Monthly Charge Per Meter	Total Monthly Base Rate	# of Residences	Monthly Base Rate Cost Per Residence
1	Fairway Village HOA	3	1 ½*	\$64.68	\$194.04	\$194.04	20	\$9.70
2	Edgewater HOA	1	1	\$32.34	\$32.34	\$200.51	44	\$4.56
		1	1 1/2	\$64.68	\$64.68			
		1	2	\$103.49	\$103.49			
3	Village Greens II HOA	2	2	\$103.49	\$206.98	\$206.98	21	\$9.86
4	Charbonneau Greens HOA	2	1 1/2	\$64.68	\$129.36	\$129.36	48	\$2.70
5	Lakeside HOA	2	2	\$103.49	\$206.98	\$206.98	41	\$5.05
6	Village Greens I HOA	2	2	\$103.49	\$206.98	\$206.98	19	\$10.89
7	Village Center	1	1 1/2	\$64.68	\$64.68	\$375.15	10	\$37.51
		3	2	\$103.49	\$310.47			
8	Mariners	2	1 1/2	\$64.68	\$129.36	\$336.34	60	\$5.60
		2	2	\$103.49	\$206.98			
9	Fairway Estates	1	3	\$194.03	\$194.03	\$194.03	35	\$5.54
10	Charbonneau Country Club	6	1	\$32.34	\$194.04	\$1,138.34	873	\$1.30
		4	1 1/2	\$64.68	\$258.72			
		1	2	\$103.49	\$103.49			
		3	3	\$194.03	\$582.09			
11	Charbonneau HOA	16	1 1/2	\$64.68	\$1,034.88	\$1,655.82	228	\$7.26
		6	2	\$103.49	\$620.94			
12	Fountain Lakes HOA	2	2	\$103.49	\$206.98	\$401.01	59	\$6.80
		1	3	\$194.03	\$194.03			
13	Arbor Lakes HOA	16	1 1/2	\$64.68	\$1,034.88	\$1,966.29	258	\$7.62
		9	2	\$103.49	\$931.41			
14	Charbonneau Golf Club	6	6	\$646.76	\$3,880.56	\$3,880.56	0	n/a

2
3
4
5
6

* Billed at 1” meters. Company installed 1 ½” meters for its own convenience. CWC should replace the 1 ½ “meters with 1” meters in the future.

1 **Q. WOULD CWC'S PROPOSED RATES ACHIEVE ITS REQUESTED**
2 **INCREASE?**

3 A. Yes. CWC requested an increase of \$140,897. Based on CWC's consumption
4 projections, the \$0.10 increase to its commodity charge would produce
5 additional annual revenues of approximately \$11,467; however, this number will
6 change depending on the amount of water consumed. The annual increase to
7 revenues from the proposed base rates would be approximately \$133,109. The
8 total annual increase in revenue for both commodity and base rates is
9 approximately \$144,575.

10 **Q. WHAT YEAR DID THE COMPANY USE AS ITS TEST PERIOD?**

11 A. The Company used April 1, 2008, through March 31, 2009, as its test period.

12 **Issue 3: Staff's Analysis of CWC's Filing**

13 **Q. WHAT WERE THE RESULTS OF STAFF'S REVIEW OF CWC'S**
14 **PROPOSED RATE INCREASE?**

15 A. Staff's analysis of CWC's rate proposal recommended an \$87,523 or 43.8
16 percent increase over current rates, with an 8.9 percent return on a rate base of
17 \$850,682, resulting in total annual revenues of \$287,276. CWC requested an
18 8.9 percent rate of return based on 100 percent equity structure in its cost of
19 capital. Staff supported this portion of CWC's proposal.

20 **Q. ARE ANY EXPENSES SHARED BY BOTH CWC AND THE GOLF**
21 **COURSE?**

22 A. Yes.

1 **Q. DID STAFF DEVELOP ANY ALLOCATIONS TO ASSIGN SHARED**
2 **COSTS BETWEEN CWC AND THE GOLF COURSE?**

3 A. Yes. Staff developed three allocation factors used to assign costs between
4 CWC and the Golf Course: 1) a general expense allocation, 2) a physical asset
5 allocation, and 3) an allocation for accounting expense.

6 **Q. PLEASE EXPLAIN HOW THE ALLOCATIONS WERE DETERMINED AND**
7 **HOW WERE THEY APPLIED.**

8 A. 1. General Expense Allocation:

9 Staff determined a general expense allocation of 19.33 percent to CWC
10 and 80.67 percent to the Golf Course for shared labor and
11 administrative-related expenses where separation of the expense was
12 difficult to verify, conflicting, or inconsistent. Staff calculated this
13 allocation by weighing the total plant, revenues, and expenses for the
14 Company and the Golf Course based on the Golf Course's annual
15 financial statements for the fiscal year ending March 31, 2009.

16 These allocated expenses included Employee Benefits, Worker's
17 Compensation Insurance, Office Supplies, partial Postage (newsletter),
18 Payroll Service, and Computer and Electronic expenses. By using a
19 three-factor formula, these costs are more appropriately assigned
20 between CWC and the Golf Course. Staff has previously applied three-
21 factor allocation formulas in water rate cases, i.e., Docket's UW 118
22 Sunriver Water Utility and UW 127 Cline Butte Utility.

23

1 2. Asset Allocation

2 Staff determined an asset allocation of 26 percent to CWC and 74
3 percent to the Golf Course. The allocation factor was determined by
4 calculating the percentage of utility plant owned by the water company
5 compared to all assets owned by the Golf Course. The calculations
6 were based on the Golf Course's 2008 tax return.

7 The 26 percent also compares to the percentage of liability
8 exposures for water company assets calculated by the insurance
9 company from separate rating classifications for water utility and golf
10 course assets.

11 Staff applied the 26 percent allocation to liability insurance expense
12 and property tax expense.

13 3. Accounting Expense Allocation

14 The Company proposed a 30/70 percent CWC/Golf Course allocation of
15 CPA services. Staff supported CWC's CPA expense allocation.

16 **Issue 4: Staff's Adjustments**

17 **Q. DID STAFF MAKE ADJUSTMENTS TO THE COMPANY'S TEST PERIOD**
18 **REVENUES, EXPENSES, AND PLANT?**

19 A. Yes. I have summarized the majority of adjustments below:

20 1. A restating increase of \$44,953 to current revenues representing the
21 revenues that would be generated at CWC's current rate using 2009
22 estimated consumption. As part of the stipulation, this is later
23 recalculated to an increase of \$54,918 using actual consumption.

1 2. An increase of \$4,643 to Employee Wages results in an annual expense
2 of \$46,208. The adjustment is based on actual wages and hours as
3 documented by CWC. It includes labor, one administrative position
4 allocated at 19.33 percent and CWC's General Manager position.

5 Staff made a \$906 downward adjustment to Employee Benefits, and
6 appropriate increases to Payroll Tax and Worker's Compensation
7 Insurance of \$3,466 and \$917, respectively, to reflect 19.33 percent
8 allocations.

9 3. An increase of \$3,599 to Purchased Power results in an annual expense
10 of \$23,815. This represents the actual annual expense, including a rate
11 increase in PGE power rates, effective January 2009.

12 4. An increase of \$1,101 to Chemicals results in an annual expense of
13 \$1,999. This represents the reported annual chemical expense for grass
14 and algae killers and pond dye (used to reduce the growth of algae).

15 5. An increase of \$1,000 to Office Supplies results in an annual expense of
16 \$1,000. Staff averaged the test year expenses and partial current
17 expenses and applied a 19.33 percent allocation factor to achieve an
18 annual expense of \$965. Staff supports CWC's \$1,000 proposed
19 expense because CWC's documentation of the current year's office
20 expense was incomplete. Staff also made an adjustment of \$215 to
21 Postage bringing the annual Postage expense to \$300.

- 1 6. An increase of \$1,398 to Materials & Supplies results in an annual
2 expense of \$2,996. This represents a two-year average of documented
3 annual expenses.
- 4 7. A decrease of \$29,497 to Repairs/Maintenance results in an annual
5 expense of \$6,460. The adjustment includes removing in-house labor
6 and capitalized items. This expense was later changed to add a pond
7 cleaning expense agreed to by the Parties.
- 8 8. A decrease of \$2,665 to Engineering Expense results in an annual
9 expense of \$523. This represents a three-year amortization of \$1,569
10 incurred for a mapping project that was later dropped by the City of
11 Wilsonville.
- 12 9. A decrease of \$2,823 to Accounting results in an annual expense of
13 \$1,080. This represents a 30 percent allocation of the total annual CPA
14 expense.
- 15 10. A decrease of \$5,619 to Legal Expense results in an annual expense of
16 \$5,916. This represents \$2,734 in annual legal fees and a five-year
17 amortization of \$15,909.61 (\$3,181.92 per year) for legal fees associated
18 with the formation of CWC.
- 19 11. A decrease of \$12,000 in Management Fees results in an annual
20 expense of \$0.00. This adjustment was proposed by the Company and
21 Staff supports it. The management of the Company is now handled by
22 the General Manager whose salary is included in Employee Wages.

- 1 12. An increase of \$1,720 to Testing results in an annual expense of \$1,720
2 for meter testing. This represents a 10-year meter testing schedule.
- 3 13. A decrease of \$3,350 to Contract Labor results in an annual expense of
4 \$0.00. Staff's analysis found that all labor was either in-house labor or
5 included in Repairs/Maintenance.
- 6 14. A decrease of \$765 to Contract Billing & Collection results in an annual
7 expense to \$0.00. Billing and collection is done in house and the cost is
8 reflected in Employee Wages.
- 9 15. Staff added a new account, Contract Payroll Services, with an annual
10 expense of \$698. This represents a 19.33 percent allocation of an
11 average 12-month cost of \$3,610.
- 12 16. A decrease of \$756 to Equipment Rental results in an annual expense of
13 \$0.00. The Company did not pay for rented equipment during the last
14 two years.
- 15 17. A decrease of \$108 to Computer/Electronics results in an annual
16 expense of \$252. This represents a 19.33 percent of the actual cost for
17 Comcast and computer/software repair and maintenance.
- 18 18. A decrease of \$897 to Transportation results in an annual expense of
19 \$0.00. This adjustment was proposed by the Company and Staff
20 supports it.
- 21 19. A decrease of \$2,168 to General Liability results in an annual expense of
22 \$3,471. This represents a 26 percent allocation of the total annual
23 premium.

- 1 20. A decrease of \$111 to Training and Certification and a decrease of
2 \$3,738 to General Expense results in annual expenses of \$0.00. These
3 adjustments were proposed by the Company and supported by Staff.
- 4 21. A decrease of \$16,898 to Depreciation Expense results in an annual
5 expense of \$31,385. This represents actual depreciation expense using
6 the National Association of Regulatory Utility Commissioners (NARUC)
7 utility plant depreciation lives for small water systems.
- 8 22. A decrease of \$749 to Property Tax results in an annual expense of
9 \$16,512. This represents a 26 percent allocation of the total \$63,506.77
10 property tax assessment.
- 11 23. Since CWC filed this case, the City of Wilsonville (City) has assessed
12 the Company a five-percent "Privilege Tax" (city tax). The tax is
13 assessed on the gross revenues the Company receives from the
14 associations. The City will not tax Golf Course revenues. Staff
15 calculated the tax and included it in the revenue requirement as an
16 adjustment of \$7,843. This adjustment was later removed by agreement
17 of all Parties. The Parties agreed that the city tax will be billed as a
18 separate line item on the customers' bills.
- 19 24. A decrease of \$60,402 to Utility Plant results in total plant of \$1,339,885.
20 This represents all water utility plant.
- 21 25. An increase of \$22,339 to Accumulated Depreciation results in a total of
22 \$518,908. This represents total depreciation expense accumulated to
23 date.

1 **Q. PLEASE DESCRIBE STAFF'S RECOMMENDED RATE DESIGN.**

2 A. Staff generally allocates the revenue requirement at 60 percent to the base
3 rate and 40 percent to the commodity rate. However, in CWC's case, Staff
4 recommended a 30 percent allocation of revenues to the base rate and a
5 70 percent allocation of revenues to the commodity rates. The rate design
6 encourages conservation and helps avoid rate shock. Customers are in a
7 better position to control their bills by controlling their water usage. Staff will
8 attempt to bring the base/commodity allocation closer to CWC's fixed and
9 variable expense ratio in subsequent rate cases.

10 **Q. PLEASE DESCRIBE HOW STAFF DETERMINED APPROPRIATE BASE**
11 **RATES.**

12 A. Staff used the American Water Works Associations (AWWA) standard capacity
13 factors to determine base rates. Staff calculated the rate for a 5/8 and 3/4 inch
14 meter and then applied the AWWA factor for each meter size. AWWA has
15 tabulated the percentage relationship of the maximum rate of use to the
16 average rate of use, which is expressed in terms of capacity factors. The
17 capacity factors recognize the particular service requirements for total volume
18 of water and peak rates of use. For example, the capacity of a 1 1/2 inch meter
19 is five times greater than a 5/8 by 3/4 inch meter.

20 **Q. PLEASE DESCRIBE HOW STAFF DETERMINED THE COMMODITY**
21 **RATE.**

22 A. Staff determined a two-year average consumption and divided the revenue
23 requirement allocated to the commodity rate by the annual average number of

1 units of water used during the last two years. Actual meter readings for 2008
2 were not available; however, CWC provided a breakdown of charges to which
3 Staff calculated the consumption. Staff used October 2008 through September
4 2009 actual meter readings to estimate 2009 usage. At the time Staff did its
5 analysis, it was the most current data. Staff later recalculated the consumption
6 using actual 2009 meter readings.

7 **Q. DID STAFF MAKE ANY ADJUSTMENTS TO CWC'S UTILITY PLANT?**

8 A. Staff added \$31,000 to utility plant as Construction Work In Progress (CWIP)
9 for work that was already in progress but not complete. This included work on
10 gate valves, check valves, vaults, a pump, and an electric panel.

11 **Q. PLEASE EXPLAIN WHAT CWIP IS AND WHY IT IS ALLOWED IN RATES**
12 **BEFORE IT IS USED AND USEFUL.**

13 A. CWIP is the term for plant that is under construction, but not yet in service.
14 While traditionally rates include the cost of plant that is used and useful,
15 ORS 757.355(2) gives the Commission authority to allow water utilities to begin
16 recovery of costs before the plant is used and useful. The Legislature found
17 CWIP may, on occasion, be appropriate to include in rates because of the
18 difficulty water systems experience in attracting capital and the capital intensive
19 nature of the infrastructure. Staff supports inclusion of CWIP in rates in this
20 case consistent with the justification as just noted.

21 OAR 860-036-0757 states:

22 The Commission may allow into rates the costs of a specific
23 capital improvement project in progress if:
24

- 1 (1) The water utility uses the additional revenues solely for the
2 purpose of completing the capital improvement project;
3 (2) The water utility demonstrates that its access to capital is
4 limited and it is in the public interest to provide funding for the
5 capitol improvement through rates; and
6 (3) Such costs are approved through tariffs filed with the
7 Commission.
8

9 **Q. DID STAFF MAKE ANY OTHER ADJUSTMENTS TO PLANT?**

10 A. Yes. Prior to calculating CWC's utility plant, Staff removed Contributions In Aid
11 of Construction (CIAC) in the amount of \$131,323. The \$131,232 represents
12 the cost customers paid for the purchase and installation of customer meters.

13 **Q. PLEASE EXPLAIN CIAC AND WHY IT IS NOT ALLOWED IN RATES.**

14 A. The Internal Revenue Service defines CIAC as any amount or item of money,
15 services or property received by a utility, from any person or governmental
16 agency, any portion of which is provided at no cost to the utility, which
17 represents an addition or transfer to the capital of the utility, and which is
18 utilized to offset the acquisition, improvement, or construction costs of the
19 utility's property, facilities, or equipment used to provide utility services to the
20 public.

21 CIAC is plant that was paid for by entities other than the utility. In CWC's
22 case, the cost of the meters was paid for by the customers. Since Company
23 funds were not used to pay for this, Staff removed \$131,323 from plant so the
24 customers are not paying twice for the meters, once when the meters were
25 purchased and again through the recovery of the meters in rates.
26

1 **Q. IS IT STANDARD PRACTICE TO REMOVE CIAC FROM RATE BASE?**

2 A. Yes. Oregon Administrative Rule 860-036-0756(3) specifically requires that
3 CIAC be separated from utility plant and accounted for and depreciated on a
4 separate schedule outside the ratemaking process.

5 **Issue 5: Customer Concerns**

6 **Q. DID THE CUSTOMERS EXPRESS ANY CONCERNS?**

7 A. The customers expressed the following concerns:

- 8 1. It is not appropriate to use meter size and the AWWA capacity factors to
9 determine base rates.
- 10 2. The percentage of revenue allocated to the commodity rate should be
11 greater than the revenue allocated to the base rate to promote
12 conservation.
- 13 3. The allocation of property tax should take into consideration the value of
14 the land held by the Golf Course and not just the capital assets.
- 15 4. The City of Wilsonville's Privilege Tax when separated into 3.5 percent
16 of the tax allowed in rates and the remaining 1.5 percent is added as a
17 surcharge to the customers' bills creates a compounding of the tax that
18 exceeds the 5 percent city tax.
- 19 5. The Company needs better communication with the customers, in
20 particular, as to when the irrigation season starts and ends, notification
21 of planned outages, notification of emergency outages, and information
22 contained on the bill.
- 23 6. Backflow protection for looped systems and inaccuracy of meters.

1 **Q. WHAT STEPS DID STAFF OR CWC TAKE TO ADDRESS THE ISSUES**
2 **ABOVE?**

3 A. Staff or CWC took the following steps to address the customers' concerns:

- 4 1. Staff concluded that it is appropriate to use meter size and the AWWA
5 capacity factors to determine base rates. The factors are based on the
6 amount of water that the meter is capable of providing, for example,
7 peak demand. The AWWA is a nationally respected leader in the water
8 industry, and Staff has historically used the AWWA factors in
9 determining the base rates for different sized meters.
- 10 2. Regarding the revenue requirement allocation between the base and
11 commodity rates, Staff considered the customers' argument and
12 supports the higher allocation of revenues to the commodity (variable)
13 rate and the lower allocation of revenues to the base (fixed) rate than the
14 standard 40/60 percent variable/fixed allocation as described in Staff's
15 discussion on rate design.
- 16 3. Staff's original 26 percent allocation for property tax includes the value of
17 the land. Staff compared the allocation of property tax with and without
18 the land value. The results show that without the additional value of the
19 land in the calculation, the allocation of property tax to the water
20 company (and the customers) would increase to 33.74 percent instead
21 of the 26 percent Staff recommended (see Tables No. 3 and No. 4
22 below). Therefore, Staff concludes that the 26 percent allocation for
23 property tax is appropriate.

1 **TABLE 3— ALLOCATION OF PROPERTY TAX WITH LAND VALUE**

Allocation Based on Plant From Tax Return					
Staff Calculated Plant					
	<u>Corporate Plant</u>	Buildings & Other Depreciable Assets	<u>Water Plant</u>	Calculated Plant for Water Case	Percentage based on water plant to total corp plant
Per Tax Return	3,975,688		1,341,584		
2008	<u>1,130,782</u>	Land			
	5,106,470		<u>1,341,584</u>		26.27%
less water	<u>(1,341,584)</u>				26.27%
	3,764,886				

2

3 **TABLE 4— ALLOCATION OF PROPERTY TAX WITHOUT LAND VALUE**

Allocation Based on Plant From Tax Return & Staff Calculated Plant					
	<u>Corporate Plant</u>	Buildings & Other Depreciable Assets	<u>Water Plant</u>	Calculated Plant for Water Case	Percentage based on water plant to total corp plant
Per Tax Return	3,975,688		1,341,584		
2008	<u>0</u>	Land			
	3,975,688		<u>1,341,584</u>		33.74%
less water	<u>(1,341,584)</u>				33.74%
	2,634,104				

4

5 4. To avoid any compounding of the city tax, the Parties agreed that the
6 city tax will be billed as a separate line item on the customers' bills.

7 5. In response to the customers' communication concern, CWC will provide
8 general water information in the monthly Charbonneau Villager, a
9 publication that goes to all homeowners. CWC information will also be
10 provided on the Golf Course website (www.charbonneaugolf.com)
11 available to anyone.

1 Company contact numbers will show on the website and on the
2 customers' bills. Water bills will include the water usage for the previous
3 month.

4 6. The concern regarding looped systems appears to be specific to a
5 particular looped system with two meters in the loop (meter numbers 51
6 and 52). Although, most meters measure water running both forward
7 and backward, doing so adds wear and tear on the meter. On
8 November 11, 2009, CWC installed backflow prevention devices on the
9 two meters to resolve this concern.

10 The second part of this concern is meter accuracy. To address this
11 concern, Staff proposes a 10-year meter testing program. The cost to
12 test CWC's meters is more expensive than a normal system because the
13 meters are calibrated to measure every 748 gallons. Therefore, a meter
14 must be removed, connected to an accurate meter and 748 gallons must
15 run through the meter to complete the test. Staff added an annual meter
16 testing expense of \$1,720 to the Company's operating revenues to
17 provide for the testing of 8 to 9 meters per year (approximately \$200 per
18 test) on a 10-year rotating testing schedule.

19

1 **Q. DID STAFF HAVE ANY CONCERNS THAT HAVE NOT BEEN**
2 **PREVIOUSLY MENTIONED?**

3 A. Yes. Staff was concerned with the accuracy and completeness of the
4 Company accounting records. However, the Company took it upon itself to
5 revise its accounting procedures to improve accuracy and efficiency. In a letter
6 to Staff dated November 19, 2009 (included as Staff/101, Miller/1, 2), CWC
7 states it will improve its filing and recording keeping with better separation of
8 CWC expenses from the Golf Course's expenses; allocation of indirect
9 expenses; recording of direct charges, in particular labor charges and benefits;
10 and equipment rentals.

11 **Q. ARE THERE ANY AFFILIATED INTEREST CONCERNS?**

12 A. Yes. CWC has indicated that it may rent equipment from the Golf Course in the
13 future. Should the Company do so, it would be considered an affiliate interest
14 transaction and will be required to be billed at the lower of cost or market.

15 **Q. DO YOU HAVE ANY OTHER CUSTOMER ISSUES TO DISCUSS?**

16 A. No.

17 **Issue 6: The Stipulated Revenue Requirement and Rates**

18 **Q. DID THE PARTIES AGREE WITH STAFF'S RECOMMENDATION?**

19 A. The Parties stipulated to Staff's recommendation with the following changes:

- 20 1. An increase to Repair/Maintenance expense of \$3,976.64 to allow for
21 pond cleaning every two years;
- 22 2. An increase of \$555 to Utility Plant, representing the purchase and
23 installation of a liner in the pond;

1 3. Removal of the city tax (\$7,843) from the revenue requirement. The
2 Parties stipulated that all 5 percent of the city tax be a separate line item
3 on the water bills. Therefore, no percentage of the city tax is included in
4 the revenue requirement.

5 Staff believes that OAR 860-036-0745, which limits the percentage of
6 city tax that may be included in rates to 3.5 percent, is not applicable in
7 this case since none of the tax is included in rates; and

8 4. All future meters shall be purchased, owned, maintained, and replaced
9 by the Company at its own expense, including replacements for the
10 existing meters. This was an issue because the current meters were
11 paid for by the customers and excluded from rate base as CIAC.

12 **Q. DID STAFF MAKE OTHER CHANGES?**

13 A. Yes. Staff recalculated the average two-year consumption used to determine
14 the variable rate. At the time of Staff's original analysis, actual meter readings
15 were available through only September 2009. At the request of an intervener,
16 Staff recalculated the 2009 consumption using 2009 actual meter readings.
17 This resulted in more 2009 water consumption, thus lowering the commodity
18 rate and affecting Staff's revenue adjustment.

19 **Q. WERE ANY OF STAFF'S ADJUSTMENTS AFFECTED BY THE ABOVE**
20 **CHANGES?**

21 A. Yes. Staff/101, Miller/8 is a summary of Staff's adjustments including those
22 affected by the stipulated changes and the recalculation of the 2009
23 consumption. Staff adjustments that were affected included:

- 1 1. An increase of \$54,918 to revenue to reflect the additional revenue CWC
- 2 would have received for actual 2009 water consumption at the current
- 3 rates. Staff's previous adjustment was based on 2009 estimated usage.
- 4 2. An increase of \$3,976.64 to Repair/Maintenance expense to allow for
- 5 pond cleaning every two years.
- 6 3. An increase of \$555 to Utility Plant, representing the purchase and
- 7 installation of a liner in the pond.
- 8 4. Removal of t \$7,843 of city tax from the revenue requirement.
- 9 5. Accompanying adjustments to Depreciation Expense, Depreciation
- 10 Reserve, Taxes, and Working Cash.

11 **Q. AFTER MAKING THE CHANGES, WHAT IS THE RESULTING REVENUE**
12 **REQUIREMENT AGREED TO BY THE PARTIES?**

- 13 A. The Parties stipulated to a revenue requirement of \$283,547. This is an
14 increase of 35.2 percent above CWC's adjusted revenues. Staff/101, Miller/7
15 shows the stipulated revenue requirement. The Parties also agreed the
16 Company should have a reasonable opportunity to earn an 8.9 percent return
17 on a rate base of \$851,552. Staff/101, Miller/3 shows CWC's cost of capital
18 and revenue sensitive factors.

19 **Q. PLEASE SUMMARIZE THE DIFFERENCE IN THE COMPANY'S**
20 **PROPOSED RATE BASE AND THE RATE BASE GENERATED BY THE**
21 **STIPULATION.**

1 A. Staff has compared CWC's proposed rate base and the resulting rate base
2 generated by the Stipulation in the table below. Staff/101, Miller/4, 5, 6 is
3 CWC's plant and depreciation schedule.

4 **TABLE 5— RATE BASE COMPARISON**

	Utility Plant In Service	Depre- ciation Reserve	Net Utility Plant	Materials & Supplies Inventory	Working Cash	Total Rate Base
CWC's Proposed	\$1,431,287	\$527,431	\$903,856	\$24,500	\$12,002	\$940,358
Resulting Rate Base	\$1,340,440	\$518,927	\$821,513	\$21,096	\$8,943	\$851,552

5
6 **Q. PLEASE SUMMARIZE THE RATES AND RATE DESIGN AGREED TO IN**
7 **THE STIPULATION.**

8 A. The Parties stipulated to Staff's recommended 30/70 percent revenue
9 allocation to the base rate and commodity rate, respectively. Staff/101, Miller/9
10 shows the rates and rate design as stipulated by the Parties. The commodity
11 rate, as stated above, is \$1.47 per unit, and the base rates are shown below.

12 **TABLE 6— BASE RATES**

Meter Size	1"	1.5"	2"	3"	6"
Base Rates	\$21.05	\$42.10	\$67.36	\$126.30	\$421.00

13
14 **Q. WHAT IS THE IMPACT OF THE STIPULATED RATES ON THE**
15 **CUSTOMERS?**

16 A. The impact of the stipulated rates is shown in the table below. Staff calculated
17 the customers' annual charges based on each customer average usage
18 between 2008 and 2009. Therefore, the amounts are only estimates. Due to
19 the large allocation of revenue to the commodity rate, any change in the
20 customers' usage patterns will significantly affect the annual charges.

1

TABLE 7– RATE IMPACT

	Average Consumption in Gallons	\$1.35 At Current Rate	Estimate Annual Total At Stip Rates	% Increase
Fairway Village HOA	372,656	\$672.58	1,491.31	121.73%
Edgewater HOA	895,619	\$1,616.43	3,328.99	105.95%
Village Greens II	1,930,159	\$3,483.58	5,415.82	55.47%
Charbonneau Greens HOA	1,543,720	\$2,786.13	4,048.94	45.33%
Lakeside HOA	2,337,126	\$4,218.08	5,408.55	28.22%
Village Greens I	1,509,575	\$2,724.50	4,587.98	68.40%
Village Center	1,267,999	\$2,288.50	5,425.99	137.10%
Mariners CVCOA	3,030,259	\$5,469.05	8,591.58	57.09%
Fairway Estates HOA	4,534,057	\$8,183.13	10,440.10	27.58%
Charbonneau Country Club	6,054,908	\$10,927.98	20,809.55	90.42%
Charbonneau HOA	8,028,436	\$14,489.83	28,735.70	98.32%
Fountain Lakes HOA	9,358,283	\$16,889.95	21,552.40	27.60%
Arbor Lakes HOA	11,744,390	\$21,196.43	38,474.87	81.52%
Charbonneau Golf Club	48,231,077	\$87,048.07	125,246.50	43.88%

2

3

Q. ARE THE RESULTING RATES FAIR AND REASONABLE?

4

A. Yes.

5

Q. DID THE PARTIES STIPULATE TO AN EFFECTIVE DATE FOR THE NEW RATES?

6

7

A. Yes. The Parties supports having the tariffs become effective for service on and after April 1, 2010.

8

9

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE STIPULATION?

10

A. Staff recommends the Commission admit the Stipulation into the UW 136 record and adopt the Stipulation in its entirety.

11

12

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

13

A. Yes.

1 CWC's Reasons for Requesting an Increase in Rates as Quoted from its

2 Application:

3 The current variable-only rate was chosen on the basis of
4 inaccurate and significantly over-projected water usage by our
5 customers. It was chosen before a comprehensive, but realistic,
6 study of our equipment and system replacement requirements
7 was completed. As a consequence of these factors, the Water
8 Company sustained a loss in its first year of operation as a
9 utility. A further factor, demonstrating the need for a base-rate
10 component, was that for certain months the Company was
11 nearing a liquidity crisis.

12
13 The majority of the Water Company's water delivery system is
14 between twenty and twenty-five years old. For a variety of
15 reasons, the predecessors-in-interest to the Water Company
16 were not attentive to establishing capital reserves to replace or
17 rejuvenate the aging system or to receiving any rate of return.
18 During this historical period (almost twenty years), our
19 homeowner-association customers enjoyed the benefits of
20 extraordinarily low charges. Should the Water Company's
21 delivery system experience a major failure in its components,
22 and the Company is without sufficient current revenues and/or
23 reserve funds to effect immediate repair. . .

24
25 Our customers (and the homeowners to whom many of our
26 customers redistribute the water) would all suffer if our service
27 was disrupted for want of the funds to replace and improve our
28 system components on a schedule to avoid or minimize
29 catastrophic failures.

CASE: UW 136
WITNESS: Kathy Miller

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 101

**Exhibits in Support
Of Direct Testimony**

January 19, 2010

November 19, 2009

Kathy Miller
Sr. Utility Analyst Water Program
Public Utility Commission
P.O. Box 2148 Suite 215
Salem, Oregon 97308-2148

Re: Charbonneau Water Company; Docket UW 136

Dear Ms. Miller:

You expressed some concern about the difficulty of separating and identifying Charbonneau Water Company's expenses and have asked the Company for some assurance that our record keeping systems can be somewhat reorganized to better facilitate that need. By this letter, we are informing you of the steps we have already taken or soon will be taking. We expect to have these procedures fully in place by the start of 2010.

Purchase order/invoice filing: We will create separate file folders specifically for invoices and purchase orders that pertain to the Water Company. If the needs of the Grounds Department of CGCI require ordering multiple products from a vendor only some of which are for the Water Company, we will issue distinct purchase orders and will request that the vendor issue distinct invoices. We will set up an intra-office protocol to see that payment is made by distinct checks correlated to those invoices. If a vendor nevertheless issues a single invoice for multiple products not all of which pertain to the Water Company (e.g. a phone bill), we will still endeavor to issue separate checks and we will place a duplicate of the invoice in Water Company records with the portion attributable to the Water Company highlighted or circled.

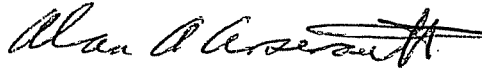
Allocated Overhead expense: For those expenses that it impracticable to break out separate charges (e.g. copying machine rental, insurance premiums, bookkeeper salary and benefits), we will continue to use an allocation formula such as proportional revenue generation from the trailing year. We will perform periodic checks to see that the formula is applied consistently.

Direct charges: The General Manager's salary will charged to the Water Company as per our annual budget and any revisions thereto. Direct labor charges from the Grounds Department will be based on daily time records and will identify the individual employees involved on each such Water Company assignment/project. Where practicable, employer-paid benefits will be charged on a monthly basis in proportion to the hours worked on Water Company assignments/projects.

Staff/101
Miller/2

Amortization of Capital Equipment: From time to time, the Water Company may need to use heavy equipment and/or Cushman carryalls. If such equipment is not available from the Grounds Department of CGCI, the equipment will be rented with the usual invoices, etc. If the equipment is available through the Grounds Department, a pro-rated charge will be shown based on actual usage and current rates from vendors.

We trust this provides the assurance you were seeking. If you have any further suggestions, please let me know.



Alan Arsenault

Manager, Charbonneau Water Company

Charbonneau Water Company LLC
Test Year: April 1, 2008 - March 31, 2009

**Staff/101
Miller/3**

REVENUE SENSITIVE COSTS

Revenues		1.0000
O&M - Uncollectibles		0.0000
Franchise Fees		0.0000
OPUC Fee		0.0025
Short-term Interest		0.0000
State Taxable Income		0.9975
State Income Tax @	6.60%	0.0658
Federal Taxable Income		0.9317
Federal Income Tax @	35.00%	0.3261
Total Income Taxes		0.3919
Total Revenue Sensitive Costs		0.3944
Utility Operating Income		0.6056
Net-to-Gross Factor		1.6513

COST OF CAPITAL

	Capital Structure	Cost	Weighted Cost
DEBT	\$0	0.00%	0.00%
	\$0		0.00%
EQUITY	\$200,000	24.36%	8.90%
	\$490,453	59.74%	8.90%
	\$80,000	9.74%	8.90%
	\$50,524	6.15%	8.90%
	\$820,977	100.00%	8.90%

Company Requested Rate of Return 8.90%

Allocation

	<u>Golf Course</u>	Water	<u>Weight</u>	<u>Golf Course</u>	<u>Water</u>
Net Plant	\$3,764,886	\$1,341,584	33.33%	24.57%	8.76%
Revenue	\$1,026,250	\$154,800	33.34%	28.97%	4.37%
Expenses	\$953,729	\$218,309	33.33%	27.12%	6.21%
				80.67%	19.33%

			A	B	C	D	E	F	G	
Acct.	Balance Per Application	Proposed Company	Adjusted Results	Proposed Staff	Adjusted Results	Staff Proposed	Proposed Results			
No.	REVENUES	Test Year: April 1, 2008 - March 31, 2009	Adjustments	(A+B=C)	Adjustments	(A+D=E)	Rev Changes	(E+F=G)		
1	461.1 Residential Water Sales			0	0	0	0	0		
2	461.2 Commercial Water Sales			0	0	0	0	0		
3	465 Irrigation -	154,800	140,897	295,697	54,918	209,718	73,827	283,545		
4	462 Irrigation - Golf Course			0	0	0	0	0		
5	471 Misc. Revenues			0	0	0	0	0		
6	Special Contracts			0	0	0	0	0		
7	TOTAL REVENUE	154,800	140,897	295,697	54,918	209,718	73,828	283,547		
8				295,697	54,918	209,718	283,545			
9	OPERATING EXPENSES									
10	601 Salaries and Wages - Employees	41,565	22,335	63,900	4,643	46,208		46,208		
11	603 Salaries and Wages - Officers			0	0	0		0		
12	604 Employee Pension & Benefits	5,401	2,599	8,000	(906)	4,495		4,495		
13	610 Purchased Water			0	0	0		0		
14	611 Telephone/Communications	609	(9)	600	(9)	600		600		
15	615 Purchased Power	20,216	5,784	26,000	3,599	23,815		23,815		
16	618 Chemical / Treatment Expense	898	1,602	2,500	1,101	1,999		1,999		
17	619 Office Supplies		1,000	1,000	1,000	1,000		1,000		
18	619.1 Postage	85	715	800	215	300		300		
19	620 O&M Materials/Supplies	1,598	(598)	1,000	1,398	2,996		2,996		
20	621 Repairs/Maintenance	35,957	(20,957)	15,000	(25,520)	10,437		10,437		
21	631 Contract Svcs - Engineering	3,188	1,812	5,000	(2,665)	523		523		
22	632 Contract Svcs - Accounting	3,903	(1,403)	2,500	(2,823)	1,080		1,080		
23	633 Contract Svcs - Legal	11,535	(6,535)	5,000	(5,619)	5,916		5,916		
24	634 Contract Svcs - Management Fees	12,000	(12,000)	0	(12,000)	0		0		
25	635 Testing		1,000	1,000	1,720	1,720		1,720		
26	636 Contract Svcs - Labor	3,350	1,650	5,000	(3,350)	0		0		
27	637 Contract Svcs - Billing/Collection	765	235	1,000	(765)	0		0		
28	Contract Svcs - Payroll Services			0	698	698		698		
29	639 Contract Svcs - Other			0	0	0		0		
30	641 Rental of Building/Real Property			0	0	0		0		
31	642 Rental of Equipment	756	(6)	750	(756)	0		0		
32	643 Small Tools			0	0	0		0		
33	648 Computer/Electronic Expenses	360	140	500	(108)	252		252		
34	650 Transportation	897	(897)	0	(897)	0		0		
35	656 Vehicle Insurance			0	0	0		0		
36	657 General Liability Insurance	5,639	(2,539)	3,100	(2,168)	3,471		3,471		
37	658 Workers' Comp Insurance	193	307	500	917	1,110		1,110		
38	659 Insurance - Other			0	0	0		0		
39	660 Public Relations/Advertising			0	0	0		0		
40	666 Amortz. of Rate Case			0	0	0		0		
41	667 Gross Revenue Fee (PUC)		875	875	524	524	185	709		
42	668 Water Resource Conservation			0	0	0		0		
43	670 Bad Debt Expense			0	0	0		0		
44	671 Cross Connection Control Program			0	0	0		0		
45	672 System Capacity Dev Program			0	0	0		0		
46	673 Training and Certification	111	(111)	0	(111)	0		0		
47	674 Consumer Confidence Report			0	0	0		0		
48	675 General Expense	3,738	(3,738)	0	(3,738)	0		0		
49	TOTAL OPERATING EXPENSE	152,764	(8,739)	144,025	(45,619)	107,145	185	107,329		
				144,025	(45,619)	107,145				
	OTHER REVENUE DEDUCTIONS									
50	403 Depreciation Expense	48,283	(18,421)	29,862	(16,879)	31,404		31,404		
51	407 Amortization Expense			0	0	0		0		
52	408.11 Property Tax	17,261	1,309	18,570	(749)	16,512		16,512		
53	408.12 Payroll Tax			0	3,466	3,466		3,466		
54	408.13 Other - Franchise Fee			0	0	0		0		
55	409.11 Oregon Income Tax			0	3,379	3,379	4,860	8,239		
56	409.10 Federal Income Tax			0	16,735	16,735	24,074	40,809		
57	TOTAL REVENUE DEDUCTIONS	218,308	(25,851)	192,457	(39,668)	178,640	29,119	207,759		
58	NET OPERATING INCOME	(63,508)	166,748	103,240	94,587	31,079	44,709	75,788		
				103,240	94,587	31,079	75,788			
59	101 Utility Plant in Service	1,400,287	31,000	1,431,287	(59,847)	1,340,440		1,340,440		
60	Less:									
61	108.1 Depreciation Reserve	496,569	30,862	527,431	22,358	518,927		518,927		
62	271 Contributions in Aid of Const			0	0	0		0		
63	272 Amortization of CIAC			0	0	0		0		
64	281 Accumulated Deferred Income Tax			0	0	0		0		
65	Net Utility Plant	903,718	138	903,856	(82,205)	821,513	0	821,513		
66	Plus: (working capital)			903,856		821,513		821,513		
67	151 Materials and Supplies Inventory	24,500	0	24,500	(3,404)	21,096		21,096		
68	Working Cash (Total Op Exp /12)	12,730	(728)	12,002	(3,801)	8,929	14	8,943		
69	TOTAL RATE BASE	940,948	(590)	940,358	(89,410)	851,538	14	851,552		
70	Rate of Return	-6.75%		10.98%		3.65%		8.90%		

SUMMARY OF ADJUSTMENTS

		Staff Adjustments to Rev Req Column D		Results	Reason
REVENUES					
1	461 Residential Water Sales	\$0	\$0	\$0	
2	461 Commercial Water Sales	\$0	\$0	\$0	
3	465 Irrigation -	\$154,800	\$54,918	\$209,718	Adjusted revenues for 2009 consumption @ the current rate
4	462 Irrigation - Golf Course	\$0	\$0	\$0	
5	471 Misc. Revenues	\$0	\$0	\$0	
6	Special Contracts	\$0	\$0	\$0	
7	TOTAL REVENUE	\$154,800	\$54,918	\$209,718	
8					
9	OPERATING EXPENSES				
10	601 Salaries and Wages - Employees	\$41,565	\$4,643	\$46,208	Water company expense @ current wages per hours per documentation
11	603 Salaries and Wages - Officers	\$0	\$0	\$0	
12	604 Employee Pension & Benefits	\$5,401	(\$906)	\$4,495	Documented expense, applied allocation factor of 19.33%
13	610 Purchased Water	\$0	\$0	\$0	
14	611 Telephone/Communications	\$609	(\$9)	\$600	Documented expense, applied allocation factor of 19.33%
15	615 Purchased Power	\$20,216	\$3,599	\$23,815	Documented expense plus adjustment for 2009 PGE rate increase
16	618 Chemical / Treatment Expense	\$898	\$1,101	\$1,999	Annual allowance for chemicals; herbicide, grass killer, pond dye
17	619 Office Supplies	\$0	\$1,000	\$1,000	Average annual cost (two years), applied allocation factor of 19.33%
18	619 Postage	\$85	\$215	\$300	Reflects 14 mailings, \$50 for pkgs, \$160 allocated for newsletter
19	620 O&M Materials/Supplies	\$1,598	\$1,398	\$2,996	Reflect average annual cost (two year average)
20	621 Repairs/Maintenance	\$35,957	(\$25,520)	\$10,437	Documented repairs less inhouse labor and capitalized items, plus pond cleaning expense
21	631 Contract Svcs - Engineering	\$3,188	(\$2,665)	\$523	3 yr amortization of \$1,569.31 engineering costs / mapping project dropped Wilsonville, \$1,569/3 = 523.
22	632 Contract Svcs - Accounting	\$3,903	(\$2,823)	\$1,080	48 hours per year @ \$75/hr, applied 30 percent allocation factor
23	633 Contract Svcs - Legal	\$11,535	(\$5,619)	\$5,916	Documented expense \$2,734.10 plus 5 yr amortization \$15,909.61 company formation work
24	634 Contract Svcs - Management Fees	\$12,000	(\$12,000)	\$0	Management fees removed; expense in salaries/wages
25	635 Testing	\$0	\$1,720	\$1,720	Allows for 8-9 meter tests per year @ approximately \$200 each; 10 year meter testing schedule
26	636 Contract Svcs - Labor	\$3,350	(\$3,350)	\$0	Expense included in salaries and wages/repairs/materials & supplies
27	637 Contract Svcs - Billing/Collection	\$765	(\$765)	\$0	Expense included in wages for secretarial
28	0 Contract Svcs - Payroll Services	\$0	\$698	\$698	Calculated
29	639 Contract Svcs - Other	\$0	\$0	\$0	
30	641 Rental of Building/Real Property	\$0	\$0	\$0	
31	642 Rental of Equipment	\$756	(\$756)	\$0	No equipment rental during last two years
32	643 Small Tools	\$0	\$0	\$0	
33	648 Computer/Electronic Expenses	\$360	(\$108)	\$252	Documented expense, applied allocation factor of 19.3%
34	650 Transportation	\$897	(\$897)	\$0	Company adjustment
35	656 Vehicle Insurance	\$0	\$0	\$0	
36	657 General Liability Insurance	\$5,639	(\$2,168)	\$3,471	Allocation based on asset liability exposures, approx. 26 percent, verified w/insurance agent
37	658 Workers' Comp Insurance	\$193	\$917	\$1,110	Documented workmen's comp from 10/2008 through 9/2009, applied allocation factor of 19.3%
38	659 Insurance - Other	\$0	\$0	\$0	
39	660 Public Relations/Advertising	\$0	\$0	\$0	
40	666 Amortz. of Rate Case	\$0	\$0	\$0	
41	667 Gross Revenue Fee (PUC)	\$0	\$524	\$524	Calculation
42	668 Water Resource Conservation	\$0	\$0	\$0	
43	670 Bad Debt Expense	\$0	\$0	\$0	
44	671 Cross Connection Control Program	\$0	\$0	\$0	
45	672 System Capacity Dev Program	\$0	\$0	\$0	
46	673 Training and Certification	\$111	(\$111)	\$0	Company adjustment
47	674 Consumer Confidence Report	\$0	\$0	\$0	
48	675 General Expense	\$3,738	(\$3,738)	\$0	Company adjustment
49	TOTAL OPERATING EXPENSE	\$152,764	(\$45,619)	\$107,145	
OTHER REVENUE DEDUCTIONS					
50	403 Depreciation Expense	\$48,283	(\$16,879)	\$31,404	See Depreciation Schedule
51	407 Amortization Expense	\$0	\$0	\$0	
52	408 Property Tax	\$17,261	(\$749)	\$16,512	Total property tax times allocation factor of 26% (% of total assets)
53	408 Payroll Tax	\$0	\$3,466	\$3,466	Calculation
54	408 Other - Franchise Fee	\$0	\$0	\$0	
55	409 Oregon Income Tax	\$0	\$3,379	\$3,379	Calculation (6.6%)
56	409 Federal Income Tax	\$0	\$16,735	\$16,735	Calculation (35%)
57	TOTAL REVENUE DEDUCTIONS	\$218,308	(\$39,668)	\$178,640	Sum
58	NET OPERATING INCOME	-\$63,508	\$94,587	\$31,079	Calculation
59	101 Utility Plant in Service	\$1,400,287	(\$59,847)	\$1,340,440	See Plant Schedule
60	Less:				
61	108 Depreciation Reserve	\$496,569	\$22,358	\$518,927	See Depreciation Schedule
62	271 Contributions in Aid of Const	\$0	\$0	\$0	
63	272 Amortization of CIAC	\$0	\$0	\$0	
64	281 Accumulated Deferred Income Tax	\$0	\$0	\$0	
65	Net Utility Plant	\$903,718	(\$82,205)	\$821,513	Plant less Depreciation
66	Plus: (working capital)		\$0	\$0	
67	151 Materials and Supplies Inventory	\$24,500	(\$3,404)	\$21,096	See Inventory Worksheet
68	Working Cash (Total Op Exp /12)	\$12,730	(\$3,801)	\$8,929	Calculation
69	TOTAL RATE BASE	\$940,948	(\$89,410)	\$851,538	Calculation

RATE DESIGN

Proposed Revenues of: \$283,547

Base/Commodity Split

Variable Rate	Proposed Rev		
70.00%	\$283,547	=	\$198,483

Base Rate	Proposed Rev		
30.00%	\$283,547	=	\$85,064
			\$283,547

BASE RATES						
Size of Line	Number of Customers	Current Monthly Base Rate	Staff Proposed Monthly Base Rate	Total Annual Revenues	Company Proposed Monthly Base Rate	Revenue at Current Rates
Residential						
5/8"	0	\$0.00	\$0.00	\$0		\$0
3/4"			\$0.00	\$0		\$0
1"			\$0.00	\$0		\$0
1.5"			\$0.00	\$0		\$0
2"			\$0.00	\$0		\$0
3"			\$0.00	\$0		\$0
	0					
Commercial						
5/8" or 3/4"	0	\$0.00		\$0		\$0
1"	10	\$0.00	\$21.05	\$2,526	\$32.34	\$0
1.5"	42	\$0.00	\$42.10	\$21,218	\$64.68	\$0
2"	29	\$0.00	\$67.36	\$23,441	\$103.49	\$0
3"	5	\$0.00	\$126.30	\$7,578	\$194.03	\$0
4"	0	0	211	0	0	0
6"	6	\$0.00	\$421.00	\$30,312	\$646.76	\$0
	92					
TOTALS	92			\$85,076		\$0

0.0%

COMMODITY RATE		1.47 per 748 gals or one unit	
<u>Proposed Revenue</u>		<u>Consumption</u>	<u>Average Rate</u>
\$198,482.82	divided by	134,811	= \$1.4723 per unit
			Previous Rate
			1.35 per Unit
100,838,264 Average usage based on 2008 & 2009 usage 0 Minus base consumpt ("free" water x cust x 12 months) <hr/> 100,838,264 748 Divided by unit of measure 748 gals <hr/> 134,811 Total Units Consumed			

CERTIFICATE OF SERVICE

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I certify that I have this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-13-0070, to the following parties or attorneys of parties.

Dated at Salem, Oregon, this 19th day of January, 2010.

Kay Barnes

Kay Barnes
Public Utility Commission
Regulatory Operations
550 Capitol St NE Ste 215
Salem, Oregon 97301-2551
Telephone: (503) 378-5763

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Service List (Parties)

STEVE CHINN	PO BOX 2 WILSONVILLE OR 97002 chinno@centurytel.net
LARRY KRIEGSHAUSER	7887 SACAJAWEA WAY WILSONVILLE OR 97002 lrkbeach@centurytel.net
CHARBONNEAU COUNTRY CLUB SUSIE STEVENS	32000 SW CHARBONNEAU DR WILSONVILLE OR 97070 ccc@teleport.com
CHARBONNEAU GOLF CLUB INC ALAN A ARSENAULT GENERAL MGR	32020 SW CHARBONNEAU DR WILSONVILLE OR 97070
CHARBONNEAU HOMEOWNERS ASSOCIATION DENNIS JABLONSKI CHOA BOARD PRESIDENT	PO BOX 219 WILSONVILLE OR 97070
CHARBONNEAU VILLAGE CENTER CONDOMINIUM SUSIE STEVENS	32000 SW CHARBONNEAU DRIVE WILSONVILLE OR 97070 ccc@teleport.com
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PUBLIC UTILITY COMMISSION KATHY MILLER	550 NE CAPITOL ST STE 215 SALEM OR 97301-2551 kathy.miller@state.or.us
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