



# Oregon

John A. Kitzhaber, MD, Governor

## Public Utility Commission

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October 30, 2014

### *Via Electronic Filing*

OREGON PUBLIC UTILITY COMMISSION  
ATTENTION: FILING CENTER  
PO BOX 1088  
SALEM OR 97308-1088

**RE: Docket No. UW 160 – In the Matter of SUNRIVER WATER LLC,  
Request for a General Rate Revision.**

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

*/s/ Kay Barnes*

Kay Barnes

Filing on Behalf of Public Utility Commission Staff

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c: UW 160 Service List (parties)

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**PUBLIC UTILITY COMMISSION  
OF OREGON**

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**UW 160**

**STAFF TESTIMONY  
OF**

**CELESTE HARI  
and  
LAUREL ANDERSON**

**SUNRIVER WATER LLC,  
Request for a General Rate Revision.**

**October 30, 2014**

CASE: UW 160  
WITNESS: CELESTE HARI

**PUBLIC UTILITY COMMISSION  
OF  
OREGON**

**STAFF EXHIBIT 100**

**Testimony In Support of The Stipulation**

**October 30, 2014**

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**INTRODUCTION**

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

A. My name is Celeste Hari. I am a Utility Analyst in the Telecommunications and Water Division of the Utility Program for the Public Utility Commission of Oregon (Commission). My business address is 3930 Fairview Industrial Dr. SE, Salem, Oregon 97302.

**Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.**

A. My Witness Qualification Statement is found in Exhibit Staff/101, Hari/1.

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

A. The purpose of my testimony is to introduce and support the Stipulation entered into by the Parties in Docket UW 160, Sunriver Water, LLC’s request for a general rate revision.

**Q. WHO IS TESTIFYING IN THIS DOCKET?**

A. I am testifying as the primary Staff witness in UW 160. Ms. Laurel Anderson will provide additional testimony in Staff/200, Anderson/1-13 regarding details of the following issues:

|  |    |
|--|----|
| Issue 1 ... The Separation of Sunriver and Sunriver Environmental, LLC .....           | 2  |
| Issue 2 ... The Golf Courses, Revenue Requirement and Rates.....                       | 3  |
| Issue 3 ... Staff's Analysis of Sunriver's Plant and CWIP .....                        | 7  |
| Issue 4 ... Staff's Analysis of the Management Contract and Accounting Practices ..... | 10 |
| Issue 5 ... Wages and Salaries, Pensions and Benefits Expenses.....                    | 12 |

1 **Q. WHO ARE THE PARTIES IN DOCKET UW 160?**

2 A. The Parties in Docket UW 160 are: Sunriver Water, LLC (Sunriver or  
3 Company), Commission Staff (Staff), and the Sunriver Owners Association  
4 (SROA).

5 **Q. DID THE PARTIES REACH A SETTLEMENT IN UW 160?**

6 A. Yes. All Parties reached an agreement in this docket. The agreement is  
7 outlined in the Stipulation filed with this testimony.

8 **Q. DID YOU PREPARE EXHIBITS FOR THIS DOCKET?**

9 A. Yes. I prepared Exhibit Staff/100, consisting of 24 pages, Exhibit Staff/101,  
10 Hari/1, consisting of one page, and Exhibit Staff/102, consisting of 13 pages.

11 **Q. HOW IS YOUR TESTIMONY ORGANIZED?**

12 A. My testimony is organized as follows:

|    |  |        |
|----|--|--------|
| 13 | Issue 1 ---- Staff's Summary Recommendation .....                  | 3      |
| 14 | Issue 2 ---- Sunriver's Description and Regulatory History .....   | 3      |
| 15 | Issue 3 ---- Summary of Sunriver's General Rate Filing.....        | 4      |
| 16 | Issue 4 ---- Summary of Staff's Analysis of Sunriver's Filing..... | 7      |
| 17 | Issue 5 ---- Staff's Review of Sunriver's Filing .....             | 7      |
| 18 | Issue 6 ---- Customer Concerns.....                                | 15     |
| 19 | Issue 7 ---- Allocation of Cost to the Golf Courses.....           | 18     |
| 20 | Issue 8 ---- Cost of Capital.....                                  | 19     |
| 21 | Issue 9 ---- The Stipulation .....                                 | 21     |
| 22 |  |        |
| 23 | Table 1 ---- Proposed Miscellaneous Fees .....                     | 6      |
| 24 | Table 2 ---- Plant and Depreciation .....                          | 13     |
| 25 | Table 3 ---- Cost of Capital.....                                  | 20     |
| 26 | Table 4 ---- Revenue Requirement Comparison .....                  | 21     |
| 27 |  |        |
| 28 | Exhibit 101 ---- Witness Qualification .....                       | Hari/1 |
| 29 |  |        |
| 30 | Exhibit 102 ---- Revenue Requirement.....                          | Hari/1 |
| 31 | Exhibit 102 ---- Adjustment Summary .....                          | Hari/2 |
| 32 | Exhibit 102 ---- Cost of Capital .....                             | Hari/3 |

1 Exhibit 102 ---- Company Current and Proposed Rates.....Hari/4  
 2 Exhibit 102 ---- Stipulated Rates .....Hari/5  
 3 Exhibit 102 ---- Plant .....Hari/6-10  
 4 Exhibit 102 ---- Golf Plant.....Hari/11-13  
 5  
 6

**ISSUE 1**

**STAFF’S SUMMARY RECOMMENDATION**

**Q. WHAT IS STAFF’S SUMMARY RECOMMENDATION?**

A. Staff recommends that the Commission adopt the Stipulation agreed to by the Parties in UW 160. The Parties agreed to a revenue requirement of \$1,755,539 and rates as outlined in the Stipulation, Attachment B - Sunriver’s tariffs, and shown in my testimony.

**ISSUE 2**

**SUNRIVER’S DESCRIPTION AND REGULATORY HISTORY**

**Q. PLEASE DESCRIBE SUNRIVER WATER, LLC.**

A. Sunriver is a rate and service regulated investor-owned water utility located in Sunriver, Oregon. The Company is organized as a limited liability company or LLC. The system was constructed in 1968 and began providing water service in 1969. Sunriver serves a community consisting of full and part-time residences, multi-family condominiums, a resort hotel, commercial areas, golf courses, and recreational facilities. The Company provides water service to approximately 4,300 residential/multi-family customers, 122 commercial

1 customers, 113 irrigation customers, 40 flat rate customers, and two golf  
2 courses (GC).

3 Sunriver is owned by Sunriver Resort LP (Resort). The Resort is organized as  
4 a limited partnership and holds 100 percent of the equity interest of Sunriver.

5 The Resort also holds 100 percent interest of Sunriver Environmental, LLC,  
6 which is an unregulated wastewater utility.

7 **Q. PLEASE PROVIDE A SUMMARY OF SUNRIVER'S REGULATORY**  
8 **HISTORY.**

9 A. Sunriver has been providing water service since 1969; however, it has only  
10 been a rate and service regulated water utility since 1983. The Company  
11 came under the Commission's regulatory authority when it began serving in  
12 excess of 500 customers. The Company has filed several previous rate cases,  
13 the last being UW 147, which was completed in 2011. The Commission  
14 approved a rate increase of 24.82 percent in UW 147.<sup>1</sup>

15  
16 **ISSUE 3**

17 **SUMMARY OF SUNRIVER'S GENERAL RATE FILING**

18 **Q. PLEASE DESCRIBE SUNRIVER'S RATE APPLICATION.**

19 A. The Company filed for a general rate increase on February 28, 2014. The  
20 application proposed an annual revenue increase of \$429,844, resulting in total  
21 annual revenues of \$2,026,219 with a 10 percent rate of return on a rate base  
22 of \$2,892,319. Sunriver's application stated its proposed increase was

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<sup>1</sup> Order No. 11-100, issued on March 31, 2011

1 28.2 percent above 2013 test year revenues. Staff calculated Sunriver's  
2 proposed increase at 26.93 percent.

3 **Q. WHY IS THE COMPANY REQUESTING THE GENERAL RATE**  
4 **INCREASE?**

5 A. Sunriver asserts that it requires a rate increase because, "...a public utility  
6 company is allowed to make a reasonable rate of return on its investment."

7 The application also states, "Sunriver Water Company has not met this rate of  
8 return in the 2013 test year and since the last rate increase has or will increase  
9 its investment in assets within six months of this application." Finally, Sunriver  
10 states that it has not kept up with rising annual inflationary costs of operating  
11 expenses.

12 **Q. WHAT ARE THE CURRENT RATES AND WHAT RATE INCREASES DID**  
13 **SUNRIVER PROPOSE IN ITS APPLICATION?**

14 A. Please see Staff/102, Hari/4 for the Company's current and proposed rates as  
15 stated in its application.

16 **Q. WHAT ARE THE EFFECTS OF SUNRIVER'S PROPOSED RATES ON THE**  
17 **AVERAGE CUSTOMERS?**

18 A. In its application, Sunriver proposed the following monthly bill changes:

- 19 1. Average residential rate increase from \$17.71 to \$22.81;  
20 2. Average commercial rate increase from \$20.69 to \$29.38;  
21 3. Average irrigation rate increase from \$19.35 to \$29.07;  
22 4. Flat-rate customer rate increase from \$19.69 to \$24.60;



1 5. No change to the current rates for the golf course of \$1,699.14 base rate  
2 and a \$0.44 per 1000 gallons commodity rate.

3 **Q. DID THE COMPANY REQUEST ANY OTHER TARIFF CHANGES?**

4 A. Yes. The Company proposed a change to Schedule 8, Miscellaneous Service  
5 Charges. The specific changes increase the per hour charge for the Trouble-  
6 Call Charge and the Disconnection/Reconnect Charge by \$10 per hour each.

7 Table 1 shows the old and new charges.

8 **TABLE 1 – PROPOSED MISCELLANEOUS FEES**

| Miscellaneous Fees      | CURRENT Normal Office Hours Charge/hour | PROPOSED Normal Office Hours Charge/hour | CURRENT After Hours Charge/hour | PROPOSED After Hours Charge/hour |
|-------------------------|---|--|---------------------------------|----------------------------------|
| Trouble-Call            | \$30                                    | \$40                                     | \$50                            | \$60                             |
| Disconnection/Reconnect | \$30                                    | \$40                                     | \$50                            | \$60                             |

9  
10 **Q. DID THE COMPANY REQUEST ANY INVESTMENTS IN ASSETS AND**  
11 **CHANGES TO UTILITY PLANT?**

12 A. Yes. Sunriver's application proposed a net increase to plant of \$481,892, from  
13 \$2,410,427 to \$2,892,319. Included in Sunriver's proposed increase was  
14 \$650,000 in Construction Work In Progress (CWIP) and additional  
15 accumulated depreciation of \$177,174. The CWIP requested was for a portion  
16 of a multi-year new reservoir project.

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**ISSUE 4**

**SUMMARY OF STAFF’S ANALYSIS OF SUNRIVER’S FILING**

**Q. PLEASE SUMMARISE STAFF’S ANALYSIS OF SUNRIVER’S REQUEST FOR A GENERAL RATE REVISION.**

A. Staff’s analysis of Sunriver’s application determined a revenue requirement of \$1,702,006 resulting in an annual revenue increase of \$105,631 or 6.62 percent above the Company’s 2013 test year revenues, with an 8 percent rate of return on a rate base of \$4,239,281.

**ISSUE 5**

**STAFF’S REVIEW OF SUNRIVER’S FILING**

**Q. WHAT ISSUES DID STAFF INVESTIGATE?**

A. Staff’s investigation and analysis of Sunriver’s general rate filing included a comprehensive examination of the Company’s revenues, expenses, proposed adjustments, rate spread and rate design, rate base, capital improvements, cost of capital, capital structure, quality of service, capacity, and customer concerns. Specific expense issues included a thorough review of the Management Contract between Sunriver and the Resort, additional affiliated interest expenses, and the proposed new reservoir project. Staff further investigated customer concerns expressed during the case. Finally Staff reviewed the cost allocations between Sunriver and Sunriver Environmental, LLC and the cost allocations between the GC and the other Sunriver customers.

1 **Q. PLEASE DISCUSS STAFF'S REVIEW OF SUNRIVER'S EXPENSES.**

2 A. Staff examined Sunriver's expenses with consideration of the prudence and  
3 reasonableness of each expense and in accordance with the rules and statutes  
4 that apply to rate-regulated water companies. Staff adjusted several expense  
5 accounts by eliminating the expense, reallocating the expense, or transferring  
6 expenses from one account to another. All of Staff's adjustments are shown in  
7 Exhibit Staff/102, Hari/2. However, the following is a brief explanation of the  
8 most significant adjustments. More detailed information regarding these  
9 adjustments is discussed in Staff/200, Anderson/1-13.

10 **Salaries and Wages**

11 Sunriver's test year wage expense as reported in its application was \$463,539.  
12 Sunriver's proposed wage expense is \$530,217. Staff adjusted test year  
13 wages to reflect actual wages shown in the employees' 2013 Form W-2s. Staff  
14 disallowed the salary of an employee that more appropriately belongs in the  
15 Management Agreement and removed wages for vacant positions that were not  
16 going to be filled. Staff allowed for a two percent employee raise and two new  
17 positions, a GIS Support Technician and a Utility Worker, as requested in the  
18 application.

19 Staff identified, verified, and used the salary allocations for water/wastewater  
20 supplied by Sunriver, which allows only water employee salaries in rates. The  
21 results of Staff's review resulted in a downward adjustment of \$37,100, bringing  
22 the total annual Salaries and Wages expense to \$493,117.

23

**Employee Pension and Benefits**

Sunriver's test year Pension and Benefits Expense as reported in its application was \$162,503. Sunriver's proposed expense is \$185,407. Staff removed all benefits associated with the salaries that were removed. In addition, the Company had previously coded all of the benefit costs to the employee's "home" station, either water or wastewater, which resulted in overstating or understating individual employee benefits. Staff recalculated these amounts and then adjusted the pension/benefits according to the same water/wastewater allocation split used for wages. Lastly, Staff removed the monetary value of accumulated vacation time that was listed as an expense resulting in an annual Pension and Benefits Expense of \$110,295.

**Contract Services – Accounting**

Sunriver's test year Contract Services - Accounting Expense as reported in its application was \$20,000. Sunriver's proposed expense is \$20,000. This amount represents the allocated cost by the Resort to Sunriver for its portion of the Resort's audit expense. Staff concluded that it is not reasonable for the customers to pay for the Resort's audit since no audit of the water utility is performed, nor is one required. Further, this is an affiliated interest transaction for which there is no approved affiliated interest contract. Staff disallowed the full \$20,000, resulting in an annual Contract Services - Accounting Expense related to audits of \$0.

**Management Fees**

Sunriver's test year affiliated interest Management Contract Expense as reported in its application was \$166,060. Sunriver's proposed expense related to that contract is \$177,684. Sunriver's affiliated interest Management Contract (Contract) was first approved in UI 168 in 1998, and amended in 2002. The cost of the Contract was set at \$110,164 in 2002 and included an escalation clause that allowed for no less than a three percent increase and no more than a seven percent increase each year.

The services provided under the Contract consist of Accounting, Officer Costs, Other Administrative, Human Resources, and Information Technology. The Resort believes it is not being fairly compensated for the "actual" cost of the work performed under the Contract. The Resort claims that under the Contract, it is entitled to an increase of up to seven percent per year. Sunriver escalated the Contract at seven percent annually from 2011 to 2013, and stated its intention to continue the seven percent increase until the expense reaches the level the Resort believes is satisfactory.

Staff believes use of a seven percent escalation rate is not justified. The escalation is well above the Consumer Price Index, which has been an average of 2.3 percent per year since 2002.

Staff reduced the expense escalation to three percent per year since UW 147.

Staff concluded that an annual management expense of \$153,826, based on that escalation was reasonable.

1 The stipulated revenue requirement includes \$166,401 for this expense item.  
2 The \$166,401 reflects an escalation factor lower than the seven percent  
3 requested by the Company.

4 **Q. DID STAFF HAVE ISSUES REGARDING THE CONTRACT OTHER THAN**  
5 **THE APPROPRIATE ESCALTION LEVEL TO BE USED?**

6 A. Yes. Staff investigated the management fees, the services provided, the  
7 services stated in the Contract, and the associated costs. Staff's review of the  
8 Company's data responses regarding the Contract concluded that the Resort  
9 was unable to provide documentation supporting the prudence of the amounts  
10 charged within the Contract or that the expenses met the lower of cost or  
11 market standard which the Commission applies to affiliated interest  
12 transactions. Staff also found the description of services and financial  
13 arrangements within the Contract to be outdated and subjective.

14 **Q. DID THE PARTIES AGREE TO A MECHANISM TO ADDRESS STAFF'S**  
15 **OTHER CONCERNS REGARDING THE MANGEMENT CONTRACT?**

16 A. Yes. The adoption of Condition No. 2 to the Stipulation was designed to address  
17 these concerns. Condition No. 2 ameliorates the concerns detailed in Issue  
18 No. 9 of my testimony and addresses issues related to all affiliated charges the  
19 Company will request recovery of in its next rate application.

20 **Rental of Building/Real Property**

21 Sunriver's test year Building Rental Expense as reported in its application was  
22 \$33,600. Sunriver's proposed building rental expense is \$33,600. Staff  
23 disallowed the entire expense of \$33,600 because it represents rent and utility

1 charges paid to Sunriver Environmental, LLC and as such, must have an  
2 approved affiliated interest agreement. There is no affiliated interest agreement  
3 in place that covers Building Rental Expense, no affiliated interest application  
4 was filed for this expense, nor is it included in the Contract.

5 The Building Rental Expenses included estimated set prices for the electric and  
6 gas utilities associated with the building. Those costs are identifiable and  
7 should be recorded in Other Utilities Expense. Staff verified the utility charges,  
8 adjusted them accordingly, and moved them to the appropriate expense  
9 account.

10 **Contract Services – Computer/Electronic**

11 Sunriver's test year Computer/Electronic Expense as reported in its application  
12 is \$56,335. Sunriver's proposed expense is \$51,978. Staff's investigation found  
13 that \$33,205 of this expense was paid directly back to the Resort for computer  
14 services. However, computer services are covered under the Contract. Staff  
15 determined that Sunriver cannot request a separate expense paid to the Resort  
16 when the cost is already covered in the Contract. Staff also made other  
17 adjustments to move transactions to more appropriate accounts, correct  
18 allocations, or disallow transactions. In total, Staff removed \$32,803 from this  
19 expense account, resulting in an annual Computer/Electronics expense of  
20 \$19,175.

1 **Q. PLEASE DISCUSS STAFF'S REVIEW OF SUNRIVER'S PROPOSED**  
2 **PLANT.**

3 A. The Company's test year total utility plant as indicated on its application was  
4 \$5,127,033. The Company proposed utility plant is \$5,777,033. This includes  
5 a \$650,000 increase in plant as Construction Work In Progress (CWIP) for one  
6 phase of Sunriver's reservoir project to be complete in the summer of 2015.

7 After further discussion with the Company and the Interveners, Staff  
8 recommended including \$2,032,967 in CWIP to capture construction costs that  
9 allows for full completion of the reservoir project.

10 Staff reconciled and updated Sunriver's utility plant and depreciation schedule  
11 to December 31, 2014. See Exhibit Staff/102, Hari 6-10, which shows the plant  
12 and depreciation schedules. Table 2 summarizes the Company's plant and  
13 depreciation in the test year, Sunriver's proposed plant and depreciation, and  
14 Staff's recommended plant and depreciation. Details of the plant and  
15 depreciation can be found in Staff/200, Anderson/7.

16 **TABLE 2 – TEST YEAR, COMPANY PROPOSED, AND STAFF'S**  
17 **RECOMMENDED PLANT AND DEPRECIATION**

|                                     | TEST<br>YEAR | COMPANY<br>PROPOSED | STAFF'S<br>RECOMMENDED |
|-------------------------------------|--------------|---------------------|------------------------|
| <b>UTILITY PLANT</b>                | \$5,127,033  | \$5,777,033         | \$7,128,133            |
| <b>ACCUMULATED<br/>DEPRECIATION</b> | \$2,855,167  | \$3,032,341         | \$3,012,034            |
| <b>NET PLANT</b>                    | \$2,271,866  | \$2,744,692         | \$4,116,099            |



1 **Q. PLEASE COMPARE THE COMPANY'S PROPOSED RATE BASE AND**  
2 **STAFF'S RECOMMENDED RATE BASE.**

3 A. The Company's proposed rate base in its application was \$2,892,319. Staff  
4 adjusted utility plant to include plant constructed since UW 147 and CWIP as  
5 previously discussed. Staff's recommended rate base is \$4,244,046.

6 **Q. PLEASE DESCRIBE WHAT IS INVOLVED IN THE RESERVOIR PROJECT.**

7 A. The reservoir project consists of: 1) preliminary engineering studies and  
8 reports, (2) site preparation, including boring beneath existing railroad tracks,  
9 (3) foundations such as providing a road, electricity, and pipes and valves to  
10 the site, (4) laying water transmission and distribution pipes, and (5)  
11 construction of a new 1.25 million gallon reservoir.

12 **Q. PLEASE DISCUSS WHY THE RESERVOIR PROJECT IS NECESSARY.**

13 A. The reservoir project is needed to provide Sunriver with additional water to  
14 address current peak capacity, water pressure, and fire flow issues. The  
15 necessity of this project was first identified in an engineering study conducted  
16 by DMJM Hilton in 1979. Additional studies were conducted in 2000 by  
17 CH2MHill and in 2011 by WHPacific. Each of the additional studies reiterates  
18 the need for additional storage capacity, and in fact, increases the amount of  
19 recommended storage with each study.

20 The reservoir will provide storage in peak demand times, hold a higher level of  
21 water in case of emergency situations, and provide a second water supply for  
22 firefighting and customer use. Currently, if an emergency should occur, the  
23 individual reservoir water would be depleted in less than one and one-half days.

1 In a fire emergency, the water would be depleted in even less time. The  
2 second reservoir increases the capacity to two and one-half days.

3 The second reservoir will also give the Company a second source from which  
4 to provide water should the current reservoir be rendered unavailable for any  
5 reason.

6 The new reservoir will also remedy a long standing customer water pressure  
7 issue at the north end of Sunriver. Water coming from the single south  
8 reservoir typically has a drop in pressure during peak demand when the water  
9 simply cannot be moved through the pipes fast enough. There is a location  
10 along the line where the supply pipes join together, thus causing a reduction in  
11 flow capacity. This in turn causes the pressure to drop for customers beyond  
12 that restriction point. The north reservoir will provide water beyond the point  
13 where the problem is located, thus solving the pressure issue.

14 For the reasons stated above, the reservoir is a benefit to every customer of  
15 Sunriver.

## 17 ISSUE 6

### 18 CUSTOMER CONCERNS

19 **Q. DID THE CUSTOMERS EXPRESS ANY CONCERNS DURING THE RATE**  
20 **CASE?**

21 A. Yes. Staff received several letters, emails, and telephone calls from individual  
22 customers. Most of the customers were generally unhappy at the prospect of  
23 their rates increasing. This is a typical concern in rate cases, and Staff

1 immediately addressed those on an individual basis. Other customer concerns  
2 included customer service, water provision, water safety, and the necessity and  
3 justification for Sunriver's request for an increase. The SROA was concerned  
4 about Sunriver's Contract with the Resort and affiliate accounting practices,  
5 including eliminating accounts.<sup>2</sup> The SROA also shares the same customer  
6 issues stated above. SROA filed a Petition to Intervene, which was granted.  
7 All concerns were considered by Staff in this rate case.

8 **Q. WHAT ACTIONS DID STAFF TAKE TO ADDRESS THESE CONCERNS?**

9 A. Staff addressed the customer issues as shown below:

10 **General Displeasure Regarding a Rate Increase**

11 Customers contacting the Commission with a complaint regarding a general  
12 rate increase were handled by Staff or the Consumer Services Division.

13 Information regarding how a rate case is investigated, including the length of  
14 time and the depth of examination, was given to the customers to assure them  
15 that the proposed rates would be investigated.

16 **The Need for an Increase**

17 A number of customers felt the request for the increase was driven by  
18 Company growth due to providing service to the Crosswater and Caldera  
19 subdivisions. Some customers believe that Sunriver should not provide water  
20 to any new-growth customers because it unfairly burdens the existing  
21 customers to pay for the infrastructure necessary to supply water to the new  
22 areas.

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<sup>2</sup> The accounting practices will be addressed in the conditions of the Stipulation.

1 Staff's response was twofold. First, the infrastructures for the Crosswater and  
2 Caldera subdivisions were constructed with funds or contributions paid by the  
3 developer; therefore, the cost of the infrastructure was not included in rates.  
4 Sunriver assured Staff that all new development infrastructures would be  
5 handled in this way.

6 Second, Staff explained that the need for a rate adjustment is not based on  
7 growth, but rather on the cost of service and the opportunity for a reasonable  
8 return on the Company's investment. In particular, Sunriver needs to invest in  
9 additional storage capacity and a new reservoir that benefits all customers.

10 **Affiliated Interests Between the Company and Sunriver Resort, LLP**

11 Concerns were expressed regarding the amount of money passing between  
12 Sunriver and its affiliates. In particular, customers are concerned that Sunriver  
13 is paying too much to the Resort in management fees. As I described earlier,  
14 Staff did a thorough investigation of the Contract and other affiliated interest  
15 expenses included in the application. As stated earlier, Condition 2 to the  
16 Stipulation was designed to address these issues. That condition, as detailed  
17 in Issue 9 of my testimony, is designed to address issues related to accounting  
18 practices and charges from affiliates the Company will request recovery of in its  
19 next rate application.

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**ISSUE 7**

**COST ALLOCATION TO THE GOLF COURSES**

**Q. PLEASE EXPLAIN THE ISSUE OF COST ALLOCATION TO THE CROSSWATER AND CALDERA SPRINGS GOLF COURSES.**

A. Following established practices regarding Sunriver, Staff split the plant and expenses associated with the GC from the rest of the customers, allowing Staff to develop a separate GC revenue requirement.

**Q. PLEASE EXPLAIN WHY THE REVENUE REQUIREMENT FOR THE GC IS SEPARATED FROM THE REST OF THE REVENUE REQUIREMENT.**

A. The GC expenses and rate base can be identified and separated from the costs of serving the remaining customer classes allowing for better cost of service ratemaking. The GC direct expenses and plant are identified and assigned. The indirect/shared expenses and plant are allocated between the GC and other customers.

It is reasonable to separate the GC costs because Well #12, which supplies the majority of irrigation water for the GC, contains contaminants such as iron and manganese, which cause the water to have a green tint. Although the contaminants do not present a health hazard, the green tint is offensive and unappealing for residential consumption.

Because the same water circumstances exist today, Staff finds it prudent to continue the separation of the GC from the other customer classes.

1 Staff Exhibit/102, Hari/1 shows Staff's recommended revenue requirement and  
2 expenses for Sunriver as a whole, and the separated amounts for the GC and  
3 the non-golf customers.

4 **Q. PLEASE EXPLAIN IN MORE DETAIL HOW SHARED EXPENSES ARE**  
5 **ALLOCATED BETWEEN THE GOLF COURSES AND THE NON-GOLF**  
6 **COURSE REVENUE REQUIREMENTS.**

7 A. Staff used the three allocations that were developed in UW 118 and applied in  
8 UW 147. The three allocations are: 1) direct billing when possible, 2) meter  
9 allocation ratio for billing functions, and 3) a 3-factor allocation based on  
10 consumption, number of meters, and dedicated plant for the remaining  
11 expenses. Further details of the GC revenue requirement are presented in  
12 Staff/200, Anderson/1-13. The detail of the non-golf course customers is  
13 presented in Staff/100, Hari/1-24 and Staff/102, Hari/1-10.

14  
15 **ISSUE 8**

16 **COST OF CAPITAL**

17 **Q. WHAT COST OF CAPITAL DID THE COMPANY REQUEST IN ITS**  
18 **APPLICATION?**

19 A. The Company requested a 10 percent cost of capital based on a 10 percent  
20 cost of equity and no debt. Since the Company's proposed capital structure  
21 included no debt, their proposed cost of capital, or allowed rate of return, was  
22 equal to their proposed cost of equity.

1 **Q. PLEASE SUMMARIZE THE COST OF CAPITAL THE PARTIES**  
2 **STIPULATED TO.**

3 A. All parties in this docket stipulated to an 8 percent cost of capital, or allowed  
4 rate of return. The derivation of the 8 percent cost of capital is shown in  
5 Table 3.

6 **TABLE 3 – RECOMMENDED COST OF CAPITAL**

|               | <b>Cost</b> | <b>Percentage</b> | <b>Weighted Cost</b> |
|---------------|-------------|-------------------|----------------------|
| <b>Debt</b>   | 6.0%        | 50.0%             | 3.0%                 |
| <b>Equity</b> | 10.0%       | 50.0%             | 5.0%                 |
| <b>Total</b>  | N/A         | 100.0%            | 8.0%                 |

7  
8 **Q. WHAT CAPITAL STRUCTURE DID STAFF RECOMMEND?**

9 A. Staff recommended a hypothetical capital structure comprised of 50 percent  
10 debt and 50 percent equity. Staff believes this structure represents a  
11 reasonable outcome in line with capital structures employed by other water  
12 utilities and will result in a more reasonable cost of capital to be borne by  
13 customers.

14 **Q. WHY IS A HYPOTHETICAL CAPITAL STRUCTURE APPROPRIATE?**

15 A. Sunriver is a relatively small portion of a much larger corporation and does not  
16 operate in isolation. As a result, Sunriver has no “stand-alone” utility capital  
17 structure from which to derive a utility specific cost of capital.

18 The Commission has historically treated utilities without a “stand-alone” utility  
19 capital structure using a hypothetical capital structure. The end result is that  
20 customers will be paying a cost of capital which more closely reflects a  
21 reasonable return for a stand-alone water utility.

1 All parties have stipulated to the use of this hypothetical capital structure in this  
2 proceeding.

3 **Q. WHAT COST OF EQUITY IS STAFF RECOMMENDING IN THIS**  
4 **PROCEEDING?**

5 A. As shown in Table 3, Staff is recommending a 10 percent cost of equity in this  
6 docket. All parties have stipulated to a 10 percent cost.

7 **Q. WHAT COST OF DEBT IS STAFF RECOMMENDING IN THIS**  
8 **PROCEEDING?**

9 A. As shown in Table 3, Staff is recommending a 6 percent cost of debt in this  
10 docket. All parties have stipulated to a 6 percent cost of debt.

11  
12 **ISSUE 9**

13 **THE STIPULATION**

14 **Q. WHAT REVENUE REQUIREMENT DID THE PARTIES STIPULATE TO IN**  
15 **UW 160?**

16 A. The Parties stipulated to a revenue requirement of \$1,755,539 reflecting a 9.97  
17 percent or \$159,164 increase over test year revenues. A comparison of the  
18 Company’s proposed revenue requirement, Staff’s recommended revenue  
19 requirement, and the stipulated revenue requirement is shown in Table 4.

20 **TABLE 4 – REVENUE REQUIREMENT COMPARISON**

| <b>Revenue Requirement</b> | <b>Sunriver Proposed</b> | <b>Staff Analysis</b> | <b>Stipulated</b>  |
|----------------------------|--------------------------|-----------------------|--------------------|
| <b>Total Company</b>       | \$2,026,219              | \$1,702,006           | <b>\$1,755,539</b> |

21



1 **Q. WHAT RATES DID THE PARTIES STIPULATE TO IN UW 160?**

2 A. The Parties stipulated to the rates shown in Staff/102, Hari/5.

3 **Q. PLEASE EXPLAIN THE DIFFERENCE BETWEEN SUNRIVER'S**  
4 **PROPOSED RATES/RATE DESIGN AND THE STIPULATED RATES/RATE**  
5 **DESIGN.**

6 A. The Company currently has a single rate for all residential, multi-family,  
7 commercial, and irrigation customers. Sunriver's application proposed  
8 separating each of these customers into individual rate bands. After the  
9 adjustments in the revenue requirement, Staff found this design did not produce  
10 fair and reasonable rates for any customer class.

11 Staff ran numerous rate scenarios and proposed rates to which the Parties  
12 stipulated. Staff's proposed rate design combines the residential, multi-family,  
13 and commercial customers into one class, a single class for irrigation  
14 customers, and a single class for fire protection.

15 **Q. WHAT ARE THE RATE COMPONENTS?**

16 A. Rates are comprised of a base rate that is charged regardless of water use and  
17 a commodity or usage rate that is charged per 1,000 gallons of water used.

18 Compared to rates based on only commodity usage, this rate design relies less  
19 on the usage of water to maintain funds and ensures that there are adequate  
20 funds for the Company to operate during the winter months when there is lower  
21 water use. It ensures that customers are paying for their own actual water used  
22 per month.

1 The commodity rate for the residential/commercial customers is \$1.39 for each  
2 1,000 gallons of water used. Base rates differ due to the size of the meter.  
3 Larger meters will have increasingly higher base rates. The full rate charts are  
4 presented in Exhibit/102, Hari/4.

5 **Q. WHAT ARE THE EFFECTS OF THE STIPULATED RATES ON THE**  
6 **AVERAGE CUSTOMER BILL?**

7 A. The effects of the stipulated rates on the average customer's monthly bills are  
8 shown below:

- 9 1. Average residential bills will increase from \$17.71 to \$20.06;
- 10 2. Average Multi-Family bills will increase from \$14.38 to \$16.17;
- 11 3. Average commercial bills (1" meter) will increase from \$53.09 to \$60.49;
- 12 4. Average irrigation bills (2" meter) will increase from \$210.87 to \$256.64;
- 13 5. Flat-rate customer bills will increase from \$19.69 to \$24.60;
- 14 6. Golf course customer bills will change from a \$1,699.14 base rate and a  
15 \$0.44 per 1000 gallons commodity rate to a \$2,235.43 base rate and a  
16 \$0.31 per 1000 gallons commodity rate.

17 **Q. DID THE PARTIES STIPULATE TO THE GC RATES?**

18 A. Yes. The Parties stipulated to the rate spread and rate design for GC, which  
19 are discussed in Staff/200, Anderson/1-13.

20 **Q. ARE THE RESULTING RATES FAIR AND REASONABLE?**

21 A. Yes.

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

1 A. Yes. The Parties agreed to an effective date of December 1, 2014, for the  
2 stipulated rates.

3 **Q. DOES THE STIPULATION CONTAIN ANY OTHER CONDITIONS?**

4 A. Yes. The Parties agreed to the following conditions:

5 1. Sunriver Water, LLC will file a new affiliated interest contract within 90  
6 days of the date of the final order. The application will address all of  
7 the charges from affiliates that the Company plans to seek rate  
8 recovery of in its next rate application.

9 2. Sunriver Water, LLC will separate the accounting for the water utility  
10 from the accounting for Sunriver Environmental, LLC and Sunriver  
11 Resort, LLP. To accomplish this, separate Balance Sheets, Income  
12 Statements, and Cash Flow Statements for Sunriver Water, LLC must  
13 be submitted to the Commission on a quarterly basis until December  
14 31, 2016, and annually thereafter.

15 **Q. WHAT IS YOUR RECOMMENDATION REGARDING THE STIPULATION?**

16 A. Staff recommends the Commission admit the Stipulation and Staff's testimony  
17 into the UW 160 record and adopt the Stipulation in its entirety.

18 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

19 A. Yes.

CASE: UW 160  
WITNESS: CELESTE HARI

**PUBLIC UTILITY COMMISSION  
OF  
OREGON**

**STAFF EXHIBIT 101**

**Witness Qualifications Statement**

**October 30, 2014**

WITNESS QUALIFICATION STATEMENT

NAME: Celeste Hari

EMPLOYER: Public Utility Commission of Oregon

TITLE: Utility Analyst, Telecommunications and Water Regulation Division.

ADDRESS: 3930 Fairview Industrial Drive SE, Salem, OR 97302  
PO Box 1088, Salem, OR 97308-1088.

EDUCATION: Bachelor of Science, Business Management, Linfield College.  
Associate of Science, Business Management, Chemeketa Community College.

EXPERIENCE: Employed with the Oregon Public Utility Commission since 1986. I am currently a Utility Analyst for the Telecommunications and Water Regulation Section.

Performed many functions within my career at PUC, including providing testimony in over 60 telecommunications dockets, analyzing tariffs, compiling reports, and processing applications for certificates of authority and ETC designations.

CASE: UW 160  
WITNESS: CELESTE HARI

**PUBLIC UTILITY COMMISSION  
OF  
OREGON**

**STAFF EXHIBIT 102**

**Exhibits in Support Of Testimony**

**October 30, 2014**



## Adjustment Summary

| Acct No. | REVENUES                           | Company             |                  | PUC Proposed     |  | Reason for Adjustment        |
|----------|------------------------------------|---------------------|------------------|------------------|--|------------------------------|
|          |                                    | Proposed            | PUC Adjustments  | Results          |  |                              |
| 461.1    | Resi/Comm/Multi-Family Water Sales | \$ 1,481,375        | (199,829)        | 1,281,546        |  | Revenue Sensitive Adjustment |
|          | Water Sales to Public Authorities  | \$ -                |                  |                  |  |                              |
| 462.1    | Irrigation -                       | \$ 295,927          | (39,919)         | 256,008          |  | Revenue Sensitive Adjustment |
| 464      | Sales for Resale                   | \$ -                | 0                | 0                |  |                              |
| 465      | Golf Course                        | \$ 156,086          | (32,278)         | 123,808          |  | Revenue Sensitive Adjustment |
| 466      | Special Contracts                  | \$ -                | 0                | 0                |  | No Adjustment                |
| 467      | Misc. Revenues                     | \$ 71,903           | 3,569            | 75,472           |  | Revenue Sensitive Adjustment |
| 468      | Cell Tower Revenue                 | \$ -                | 0                | 0                |  | No Adjustment                |
| 471      | Cross Connection Control Revenue   | \$ -                |                  |                  |  | No Adjustment                |
|          | Private Fire Protection            | \$ 9,120            | (1,230)          | 7,890            |  |                              |
|          | Unmetered Domestic Water Sales     | \$ 11,808           | (993)            | 10,815           |  |                              |
|          | <b>TOTAL REVENUE</b>               | <b>\$ 2,026,219</b> | <b>(270,680)</b> | <b>1,755,539</b> |  | Revenue Sensitive Adjustment |

| OPERATING EXPENSES |                                    |                     |                     |                     |  |   |
|--------------------|------------------------------------|---------------------|---------------------|---------------------|--|---|
| 601                | Salaries and Wages - Employees     | \$ 530,217          | \$ (37,100)         | \$ 493,117          |  | Correct Allocations, position additions, disallowed UGM salary no AI Contract |
| 603                | Salaries and Wages - Officers      | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 604                | Employee Pension & Benefits        | \$ 185,407          | \$ (75,112)         | \$ 110,295          |  | Correct Allocations, position additions, disallowed UGM salary no AI Contract |
| 610                | Purchased Water                    | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 611                | Telephone/Communications           | \$ 3,900            | \$ (997)            | \$ 2,903            |  | Partial allowances, actuals from bills  |
| 615                | Purchased Power                    | \$ 63,898           | \$ 12,778           | \$ 76,676           |  | Added payment for well 12 that had been miscoded by company                   |
| 616                | Fuel for Power Production          | \$ 115              | \$ (3)              | \$ 112              |  | Rounding  |
| 617                | Other Utilities                    | \$ -                | \$ 3,051            | \$ 3,051            |  | Moved to Other Utilities from Bldg Rental                                     |
| 618                | Chemical / Treatment Expense       | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 619                | Office Supplies                    | \$ 1,711            | \$ 63               | \$ 1,774            |  | Move expenses to appropriate accounts   |
| 619.1              | Postage                            | \$ 24,093           | \$ (7,739)          | \$ 16,354           |  | Move expenses to appropriate accounts   |
| 620                | O&M Materials/Supplies             | \$ 6,501            | \$ 229              | \$ 6,730            |  | Move expenses to appropriate accounts   |
| 621                | Repairs to Water Plant             | \$ 10,196           | \$ (4,955)          | \$ 5,241            |  | Move expenses to appropriate accounts   |
| 631                | Contract Svcs - Engineering        | \$ -                | \$ 2,299            | \$ 2,299            |  | Move expenses to appropriate accounts   |
| 632                | Contract Svcs - Accounting         | \$ 20,000           | \$ (20,000)         | \$ -                |  | Disallowed, not a Water Co. expense   |
| 633                | Contract Svcs - Legal              | \$ 4,550            | \$ (638)            | \$ 3,912            |  | Used 3-year average   |
| 634                | Contract Svcs - Management Fees    | \$ 177,684          | \$ (11,283)         | \$ 166,401          |  | 3% per year increase allowed  |
| 635                | Contract Svcs - Testing            | \$ 2,350            | \$ 1,280            | \$ 3,630            |  | Increase to forward-looking three year average                                |
| 636                | Contract Svcs - Labor              | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 637                | Contract Svcs - Billing/Collection | \$ 6,900            | \$ -                | \$ 6,900            |  | No Adjustment   |
| 638                | Contract Svcs - Meter Reading      | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 639                | Contract Svcs - Other              | \$ 15,449           | \$ (6,401)          | \$ 9,048            |  | Move expenses to appropriate accounts, disallowed non-test year items         |
| 641                | Rental of Building/Real Property   | \$ 33,600           | \$ (33,600)         | \$ -                |  | Disallowed/Affil. Interest without approved contract                          |
| 642                | Rental of Equipment                | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 643                | Small Tools                        | \$ 4,485            | \$ (3,761)          | \$ 724              |  | Move expenses to appropriate accounts, disallowed non-test year items         |
| 648                | Computer/Electronic Expenses       | \$ 51,978           | \$ (32,803)         | \$ 19,175           |  | Disallowed/Affil. Interest without approved contract                          |
| 650                | Transportation                     | \$ 43,376           | \$ (6,832)          | \$ 36,744           |  | Move expenses to appropriate accounts   |
| 656                | Vehicle Insurance                  | \$ -                | \$ 10,045           | \$ 10,045           |  | Allocated from an actual overall bill   |
| 657                | General Liability Insurance        | \$ 24,180           | \$ (9,757)          | \$ 14,423           |  | Allocated from an actual overall bill   |
| 658                | Workers' Comp Insurance            | \$ 20,532           | \$ (6,642)          | \$ 13,890           |  | To adjust based on WC rates assigned to empl.                                 |
| 659                | Insurance - Other                  | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 660                | Public Relations/Advertising       | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 666                | Amortz. of Rate Case               | \$ 2,500            | \$ (0)              | \$ 2,500            |  | No Adjustment   |
| 667                | Gross Revenue Fee (PUC)            | \$ 5,066            | \$ (677)            | \$ 4,389            |  | Revenue Sensitive Adjustment  |
| 668                | Water Resources Conservation       | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 670                | Bad Debt Expense                   | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 671                | Cross Connection Control Program   | \$ -                | \$ 200              | \$ 200              |  | Move expenses to appropriate accounts   |
| 672                | System Capacity Development        | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 673                | Training and Certification         | \$ 5,113            | \$ (411)            | \$ 4,702            |  | Amortizing for two-year certificates, etc.                                    |
| 674                | Consumer Confidence Report         | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| 675                | Miscellaneous Expense              | \$ 4,575            | \$ (3,217)          | \$ 1,358            |  | Move expenses to appropriate accounts   |
| OE1                | Other Expense 1                    | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| OE2                | Other Expense 2                    | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
| OE3                | Other Expense 3                    | \$ -                | \$ -                | \$ -                |  | No Adjustment   |
|                    | <b>TOTAL OPERATING EXPENSE</b>     | <b>\$ 1,248,376</b> | <b>\$ (231,780)</b> | <b>\$ 1,016,596</b> |  | Calculation   |

| OTHER REVENUE DEDUCTIONS |                                       |                     |                     |                     |  |  |
|--------------------------|---------------------------------------|---------------------|---------------------|---------------------|--|--|
| 403                      | Depreciation Expense                  | \$ 177,174          | \$ (14,206)         | \$ 162,968          |  | Reflect 2014 deprec exp                              |
| 406                      | Amort of Plant Acquisition Adjustment | \$ -                | \$ -                | \$ -                |  | No Adjustment  |
| 407                      | Amortization Expense                  | \$ -                | \$ -                | \$ -                |  | No Adjustment  |
| 408.11                   | Property Tax                          | \$ 61,528           | \$ -                | \$ 61,528           |  | No Adjustment  |
| 408.12                   | Payroll Tax                           | \$ 51,113           | \$ (7,042)          | \$ 44,071           |  | Reflect actual payroll tax on salaries/wages allowed |
| 408.13                   | Other                                 | \$ -                | \$ -                | \$ -                |  | No Adjustment  |
| 409.1                    | Federal Income Tax                    | \$ 165,930          | \$ (57,719)         | \$ 108,211          |  | Revenue Sensitive Adjustment                         |
| 409.11                   | Oregon Income Tax                     | \$ 32,952           | \$ (10,310)         | \$ 22,642           |  | Revenue Sensitive Adjustment                         |
| 409.13                   | Extraordinary Items Income Tax        | \$ -                | \$ -                | \$ -                |  | No Adjustment  |
|                          | <b>TOTAL REVENUE DEDUCTIONS</b>       | <b>\$ 1,737,073</b> | <b>\$ (321,057)</b> | <b>\$ 1,416,016</b> |  | Calculation  |
|                          | <b>NET OPERATING INCOME</b>           | <b>\$ 289,146</b>   | <b>\$ 50,377</b>    | <b>\$ 339,523</b>   |  | Calculation  |

| UTILITY RATE BASE |                                  |                     |                     |                     |  |   |
|-------------------|----------------------------------|---------------------|---------------------|---------------------|--|---|
| 101               | Utility Plant in Service         | \$ 5,777,033        | \$ 1,351,100        | \$ 7,128,133        |  | Reflect actual plant                    |
| 272               | Amortization of CIAC             | \$ -                | \$ -                | \$ -                |  | No Adjustment                           |
|                   | Less:                            |                     |                     |                     |  |   |
| 108.1             | Depreciation Reserve             | \$ 3,032,341        | \$ (20,307)         | \$ 3,012,034        |  | Reflect actual accumulated depreciation |
| 271               | Contributions in Aid of Const    | \$ -                | \$ -                | \$ -                |  | No Adjustment                           |
| 281               | Accumulated Deferred Income Tax  | \$ -                | \$ -                | \$ -                |  | No Adjustment                           |
|                   | Net Utility Plant                | \$ 2,744,692        | \$ 1,371,407        | \$ 4,116,099        |  | Calculation                             |
|                   | Plus: (working capital)          |                     |                     |                     |  |   |
| 151               | Materials and Supplies Inventory | \$ 43,596           | \$ -                | \$ 43,596           |  | No Adjustment                           |
| WrkCash           | Working Cash (Total Op Exp /12)  | \$ 104,031          | \$ (19,680)         | \$ 84,351           |  | 1/12 of total operating expenses        |
|                   | <b>TOTAL RATE BASE</b>           | <b>\$ 2,892,319</b> | <b>\$ 1,351,727</b> | <b>\$ 4,244,046</b> |  | Calculation                             |



**Cost of Capital**

50/50 CAPITAL STRUCTURE

Utility Proposed Rate of Return

Test Year Rate of Return

Staff Proposed Rate of Return

**Cost of Debt**

| Debt              | Original Balance | Outstanding Balance | Capital Structure | Cost  | Weighted Cost |
|-------------------|------------------|---------------------|-------------------|-------|---------------|
| None              |                  |                     | 50.00%            | 6.00% | 3.00%         |
| 0                 | \$0              | \$0                 |                   | 0.00% |               |
| 0                 | \$0              | \$0                 |                   | 0.00% |               |
| 0                 | \$0              | \$0                 |                   | 0.00% |               |
| 0                 | \$0              | \$0                 |                   | 0.00% |               |
| 0                 | \$0              | \$0                 |                   | 0.00% |               |
|                   |                  |                     |                   |       |               |
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|                   |                  |                     |                   |       |               |
|                   |                  |                     |                   |       |               |
|                   |                  |                     |                   |       |               |
| <b>TOTAL DEBT</b> | <b>\$0</b>       | <b>\$0</b>          |                   |       | <b>3.00%</b>  |

**Equity**

| Equity                     | Original Balance | Outstanding Balance | Capital Structure | Cost   | Weighted Cost |
|----------------------------|------------------|---------------------|-------------------|--------|---------------|
| Net Plant                  |                  |                     | 50.00%            | 10.00% | 5.00%         |
|                            |                  |                     |                   |        |               |
|                            |                  |                     |                   |        |               |
|                            |                  |                     |                   |        |               |
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|                            |                  |                     |                   |        |               |
|                            |                  |                     |                   |        |               |
| <b>TOTAL EQUITY</b>        | <b>\$0</b>       | <b>\$0</b>          |                   |        | <b>5.00%</b>  |
| <b>TOTAL DEBT + EQUITY</b> |                  | <b>\$0</b>          |                   |        | <b>8.00%</b>  |

Rate of Return

**SUNRIVER'S CURRENT AND PROPOSED RATES**

| <b>CUSTOMER CLASS</b>       | <b>METER SIZE</b> | <b>CURRENT BASE RATES</b> | <b>CURRENT COMMODITY RATE</b> | <b>PROPOSED BASE RATES</b> | <b>PROPOSED COMMODITY RATE</b> |
|-----------------------------|-------------------|---------------------------|-------------------------------|----------------------------|--------------------------------|
| RESIDENTAL/<br>MULTI-FAMILY | 5/8-3/4           | \$10.84                   | \$1.19 per 1000 gals          | \$14.85                    | \$1.38 per 1000 gals           |
| RESIDENTIAL                 | 1"                | \$27.11                   | \$1.19 per 1000 gals          | \$37.13                    | \$1.38 per 1000 gals           |
| RESIDENTIAL                 | 1 1/2"            | \$54.21                   | \$1.19 per 1000 gals          | \$74.25                    | \$1.38 per 1000 gals           |
| COMMERCIAL                  | 5/8-3/4           | \$10.84                   | \$1.19 per 1000 gals          | \$17.95                    | \$1.38 per 1000 gals           |
| COMMERCIAL                  | 1"                | \$27.11                   | \$1.19 per 1000 gals          | \$44.88                    | \$1.38 per 1000 gals           |
| COMMERCIAL                  | 1 1/2"            | \$54.21                   | \$1.19 per 1000 gals          | \$89.75                    | \$1.38 per 1000 gals           |
| COMMERCIAL                  | 2"                | \$86.74                   | \$1.19 per 1000 gals          | \$143.60                   | \$1.38 per 1000 gals           |
| COMMERCIAL                  | 3"                | \$162.64                  | \$1.19 per 1000 gals          | \$269.25                   | \$1.38 per 1000 gals           |
| COMMERCIAL                  | 4"                | \$271.06                  | \$1.19 per 1000 gals          | NA                         | \$1.38 per 1000 gals           |
| COMMERCIAL                  | 6"                | \$542.13                  | \$1.19 per 1000 gals          | \$897.50                   | \$1.38 per 1000 gals           |
| IRRIGATION                  | 5/8-3/4           | \$10.84                   | \$1.19 per 1000 gals          | \$19.20                    | \$1.38 per 1000 gals           |
| IRRIGATION                  | 1"                | \$27.11                   | \$1.19 per 1000 gals          | \$48.00                    | \$1.38 per 1000 gals           |
| IRRIGATION                  | 1 1/2"            | \$54.21                   | \$1.19 per 1000 gals          | \$96.00                    | \$1.38 per 1000 gals           |
| IRRIGATION                  | 2"                | \$86.74                   | \$1.19 per 1000 gals          | \$153.60                   | \$1.38 per 1000 gals           |
| IRRIGATION                  | 3"                | \$162.64                  | \$1.19 per 1000 gals          | \$288.00                   | \$1.38 per 1000 gals           |
| FIRE PROTECTION             | 2"                | \$5.08                    | N/A                           | \$6.80                     | N/A                            |
| FIRE PROTECTION             | 3"                | \$9.53                    | N/A                           | \$13.35                    | N/A                            |
| FIRE PROTECTION             | 4"                | \$15.88                   | N/A                           | \$19.50                    | N/A                            |
| FIRE PROTECTION             | 6"                | \$31.77                   | N/A                           | \$38.15                    | N/A                            |
| FIRE PROTECTION             | 8"                | \$50.83                   | N/A                           | \$58.80                    | N/A                            |
| FLAT RATE                   | N/A               | \$19.69                   | N/A                           | \$24.60                    | N/A                            |
| GOLF COURSE                 | N/A               | \$1,699.14                | \$.44 per 1000 gals           | \$1,699.14                 | \$.44 per 1000 gals            |

### UW 160 STIPULATED RATES

| CUSTOMER CLASS               | METER SIZE | STIPULATED BASE RATES | STIPULATED COMMODITY RATE |
|------------------------------|------------|-----------------------|---------------------------|
| RESIDENTIAL/<br>MULTI-FAMILY | 5/8-3/4    | \$12.02               | \$1.39 per 1000 gals      |
| RESIDENTIAL                  | 1"         | \$30.05               | \$1.39 per 1000 gals      |
| RESIDENTIAL                  | 1 1/2"     | \$60.10               | \$1.39 per 1000 gals      |
|                              |            |                       |                           |
| COMMERCIAL                   | 5/8-3/4    | \$12.02               | \$1.39 per 1000 gals      |
| COMMERCIAL                   | 1"         | \$30.05               | \$1.39 per 1000 gals      |
| COMMERCIAL                   | 1 1/2"     | \$60.10               | \$1.39 per 1000 gals      |
| COMMERCIAL                   | 2"         | \$96.17               | \$1.39 per 1000 gals      |
| COMMERCIAL                   | 3"         | \$180.31              | \$1.39 per 1000 gals      |
| COMMERCIAL                   | 4"         | \$300.52              | \$1.39 per 1000 gals      |
| COMMERCIAL                   | 6"         | \$601.04              | \$1.39 per 1000 gals      |
|                              |            |                       |                           |
| IRRIGATION                   | 3/4x5/8    | \$12.55               | \$1.50 per 1000 gals      |
| IRRIGATION                   | 1"         | \$31.37               | \$1.50 per 1000 gals      |
| IRRIGATION                   | 1 1/2"     | \$62.75               | \$1.50 per 1000 gals      |
| IRRIGATION                   | 2"         | \$100.40              | \$1.50 per 1000 gals      |
| IRRIGATION                   | 3"         | \$188.24              | \$1.50 per 1000 gals      |
|                              |            |                       |                           |
| FIRE PROTECTION              | 2"         | \$5.66                | N/A                       |
| FIRE PROTECTION              | 3"         | \$10.60               | N/A                       |
| FIRE PROTECTION              | 4"         | \$17.67               | N/A                       |
| FIRE PROTECTION              | 6"         | \$35.35               | N/A                       |
| FIRE PROTECTION              | 8"         | \$56.56               | N/A                       |
|                              |            |                       |                           |
| FLAT RATE                    | N/A        | \$22.53               | N/A                       |
|                              |            |                       |                           |
| GOLF COURSE                  | 3"         | \$2,235.43            | \$0.31 per 1000 gals      |













Invested Plant- Golf

| Acct No. | Account Description | Date Acquired | Utility Plant Orig Cost | Less Excess Capacity Adj to Plant | Total Adj Plant | NARUC Asset Life | Annual Deprec | Final Month of Deprec | Before 1985 | 1985 | 1986 | 1987 | 1988 | 1989 | 1990 | 1991 | 1992 | 1993 | 1994 | 1995 | 1996 | 1997 | 1998 | 1999 | 2000 | 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 | 2036 | 2037 | 2038 | 2039 | 2040 | 2041 | 2042 | 2043 | 2044 | 2045 | 2046 | 2047 | 2048 | 2049 | 2050 | 2051 | 2052 | 2053 | 2054 | 2055 | 2056 | 2057 | 2058 | 2059 | 2060 | 2061 | 2062 | 2063 | 2064 | 2065 | 2066 | 2067 | 2068 | 2069 | 2070 | 2071 | 2072 | 2073 | 2074 | 2075 | 2076 | 2077 | 2078 | 2079 | 2080 | 2081 | 2082 | 2083 | 2084 | 2085 | 2086 | 2087 | 2088 | 2089 | 2090 | 2091 | 2092 | 2093 | 2094 | 2095 | 2096 | 2097 | 2098 | 2099 | 2100 | 2101 | 2102 | 2103 | 2104 | 2105 | 2106 | 2107 | 2108 | 2109 | 2110 | 2111 | 2112 | 2113 | 2114 | 2115 | 2116 | 2117 | 2118 | 2119 | 2120 | 2121 | 2122 | 2123 | 2124 | 2125 | 2126 | 2127 | 2128 | 2129 | 2130 | 2131 | 2132 | 2133 | 2134 | 2135 | 2136 | 2137 | 2138 | 2139 | 2140 | 2141 | 2142 | 2143 | 2144 | 2145 | 2146 | 2147 | 2148 | 2149 | 2150 | 2151 | 2152 | 2153 | 2154 | 2155 | 2156 | 2157 | 2158 | 2159 | 2160 | 2161 | 2162 | 2163 | 2164 | 2165 | 2166 | 2167 | 2168 | 2169 | 2170 | 2171 | 2172 | 2173 | 2174 | 2175 | 2176 | 2177 | 2178 | 2179 | 2180 | 2181 | 2182 | 2183 | 2184 | 2185 | 2186 | 2187 | 2188 | 2189 | 2190 | 2191 | 2192 | 2193 | 2194 | 2195 | 2196 | 2197 | 2198 | 2199 | 2200 | 2201 | 2202 | 2203 | 2204 | 2205 | 2206 | 2207 | 2208 | 2209 | 2210 | 2211 | 2212 | 2213 | 2214 | 2215 | 2216 | 2217 | 2218 | 2219 | 2220 | 2221 | 2222 | 2223 | 2224 | 2225 | 2226 | 2227 | 2228 | 2229 | 2230 | 2231 | 2232 | 2233 | 2234 | 2235 | 2236 | 2237 | 2238 | 2239 | 2240 | 2241 | 2242 | 2243 | 2244 | 2245 | 2246 | 2247 | 2248 | 2249 | 2250 | 2251 | 2252 | 2253 | 2254 | 2255 | 2256 | 2257 | 2258 | 2259 | 2260 | 2261 | 2262 | 2263 | 2264 | 2265 | 2266 | 2267 | 2268 | 2269 | 2270 | 2271 | 2272 | 2273 | 2274 | 2275 | 2276 | 2277 | 2278 | 2279 | 2280 | 2281 | 2282 | 2283 | 2284 | 2285 | 2286 | 2287 | 2288 | 2289 | 2290 | 2291 | 2292 | 2293 | 2294 | 2295 | 2296 | 2297 | 2298 | 2299 | 2300 | 2301 | 2302 | 2303 | 2304 | 2305 | 2306 | 2307 | 2308 | 2309 | 2310 | 2311 | 2312 | 2313 | 2314 | 2315 | 2316 | 2317 | 2318 | 2319 | 2320 | 2321 | 2322 | 2323 | 2324 | 2325 | 2326 | 2327 | 2328 | 2329 | 2330 | 2331 | 2332 | 2333 | 2334 | 2335 | 2336 | 2337 | 2338 | 2339 | 2340 | 2341 | 2342 | 2343 | 2344 | 2345 | 2346 | 2347 | 2348 | 2349 | 2350 | 2351 | 2352 | 2353 | 2354 | 2355 | 2356 | 2357 | 2358 | 2359 | 2360 | 2361 | 2362 | 2363 | 2364 | 2365 | 2366 | 2367 | 2368 | 2369 | 2370 | 2371 | 2372 | 2373 | 2374 | 2375 | 2376 | 2377 | 2378 | 2379 | 2380 | 2381 | 2382 | 2383 | 2384 | 2385 | 2386 | 2387 | 2388 | 2389 | 2390 | 2391 | 2392 | 2393 | 2394 | 2395 | 2396 | 2397 | 2398 | 2399 | 2400 | 2401 | 2402 | 2403 | 2404 | 2405 | 2406 | 2407 | 2408 | 2409 | 2410 | 2411 | 2412 | 2413 | 2414 | 2415 | 2416 | 2417 | 2418 | 2419 | 2420 | 2421 | 2422 | 2423 | 2424 | 2425 | 2426 | 2427 | 2428 | 2429 | 2430 | 2431 | 2432 | 2433 | 2434 | 2435 | 2436 | 2437 | 2438 | 2439 | 2440 | 2441 | 2442 | 2443 | 2444 | 2445 | 2446 | 2447 | 2448 | 2449 | 2450 | 2451 | 2452 | 2453 | 2454 | 2455 | 2456 | 2457 | 2458 | 2459 | 2460 | 2461 | 2462 | 2463 | 2464 | 2465 | 2466 | 2467 | 2468 | 2469 | 2470 | 2471 | 2472 | 2473 | 2474 | 2475 | 2476 | 2477 | 2478 | 2479 | 2480 | 2481 | 2482 | 2483 | 2484 | 2485 | 2486 | 2487 | 2488 | 2489 | 2490 | 2491 | 2492 | 2493 | 2494 | 2495 | 2496 | 2497 | 2498 | 2499 | 2500 | 2501 | 2502 | 2503 | 2504 | 2505 | 2506 | 2507 | 2508 | 2509 | 2510 | 2511 | 2512 | 2513 | 2514 | 2515 | 2516 | 2517 | 2518 | 2519 | 2520 | 2521 | 2522 | 2523 | 2524 | 2525 | 2526 | 2527 | 2528 | 2529 | 2530 | 2531 | 2532 | 2533 | 2534 | 2535 | 2536 | 2537 | 2538 | 2539 | 2540 | 2541 | 2542 | 2543 | 2544 | 2545 | 2546 | 2547 | 2548 | 2549 | 2550 | 2551 | 2552 | 2553 | 2554 | 2555 | 2556 | 2557 | 2558 | 2559 | 2560 | 2561 | 2562 | 2563 | 2564 | 2565 | 2566 | 2567 | 2568 | 2569 | 2570 | 2571 | 2572 | 2573 | 2574 | 2575 | 2576 | 2577 | 2578 | 2579 | 2580 | 2581 | 2582 | 2583 | 2584 | 2585 | 2586 | 2587 | 2588 | 2589 | 2590 | 2591 | 2592 | 2593 | 2594 | 2595 | 2596 | 2597 | 2598 | 2599 | 2600 | 2601 | 2602 | 2603 | 2604 | 2605 | 2606 | 2607 | 2608 | 2609 | 2610 | 2611 | 2612 | 2613 | 2614 | 2615 | 2616 | 2617 | 2618 | 2619 | 2620 | 2621 | 2622 | 2623 | 2624 | 2625 | 2626 | 2627 | 2628 | 2629 | 2630 | 2631 | 2632 | 2633 | 2634 | 2635 | 2636 | 2637 | 2638 | 2639 | 2640 | 2641 | 2642 | 2643 | 2644 | 2645 | 2646 | 2647 | 2648 | 2649 | 2650 | 2651 | 2652 | 2653 | 2654 | 2655 | 2656 | 2657 | 2658 | 2659 | 2660 | 2661 | 2662 | 2663 | 2664 | 2665 | 2666 | 2667 | 2668 | 2669 | 2670 | 2671 | 2672 | 2673 | 2674 | 2675 | 2676 | 2677 | 2678 | 2679 | 2680 | 2681 | 2682 | 2683 | 2684 | 2685 | 2686 | 2687 | 2688 | 2689 | 2690 | 2691 | 2692 | 2693 | 2694 | 2695 | 2696 | 2697 | 2698 | 2699 | 2700 | 2701 | 2702 | 2703 | 2704 | 2705 | 2706 | 2707 | 2708 | 2709 | 2710 | 2711 | 2712 | 2713 | 2714 | 2715 | 2716 | 2717 | 2718 | 2719 | 2720 | 2721 | 2722 | 2723 | 2724 | 2725 | 2726 | 2727 | 2728 | 2729 | 2730 | 2731 | 2732 | 2733 | 2734 | 2735 | 2736 | 2737 | 2738 | 2739 | 2740 | 2741 | 2742 | 2743 | 2744 | 2745 | 2746 | 2747 | 2748 | 2749 | 2750 | 2751 | 2752 | 2753 | 2754 | 2755 | 2756 | 2757 | 2758 | 2759 | 2760 | 2761 | 2762 | 2763 | 2764 | 2765 | 2766 | 2767 | 2768 | 2769 | 2770 | 2771 | 2772 | 2773 | 2774 | 2775 | 2776 | 2777 | 2778 | 2779 | 2780 | 2781 | 2782 | 2783 | 2784 | 2785 | 2786 | 2787 | 2788 | 2789 | 2790 | 2791 | 2792 | 2793 | 2794 | 2795 | 2796 | 2797 | 2798 | 2799 | 2800 | 2801 | 2802 | 2803 | 2804 | 2805 | 2806 | 2807 | 2808 | 2809 | 2810 | 2811 | 2812 | 2813 | 2814 | 2815 | 2816 | 2817 | 2818 | 2819 | 2820 | 2821 | 2822 | 2823 | 2824 | 2825 | 2826 | 2827 | 2828 | 2829 | 2830 | 2831 | 2832 | 2833 | 2834 | 2835 | 2836 | 2837 | 2838 | 2839 | 2840 | 2841 | 2842 | 2843 | 2844 | 2845 | 2846 | 2847 | 2848 | 2849 | 2850 | 2851 | 2852 | 2853 | 2854 | 2855 | 2856 | 2857 | 2858 | 2859 | 2860 | 2861 | 2862 | 2863 | 2864 | 2865 | 2866 | 2867 | 2868 | 2869 | 2870 | 2871 | 2872 | 2873 | 2874 | 2875 | 2876 | 2877 | 2878 | 2879 | 2880 | 2881 | 2882 | 2883 | 2884 | 2885 | 2886 | 2887 | 2888 | 2889 | 2890 | 2891 | 2892 | 2893 | 2894 | 2895 | 2896 | 2897 | 2898 | 2899 | 2900 | 2901 | 2902 | 2903 | 2904 | 2905 | 2906 | 2907 | 2908 | 2909 | 2910 | 2911 | 291 |
|----------|---------------------|---------------|-------------------------|-----------------------------------|-----------------|------------------|---------------|-----------------------|-------------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|--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|----------|---------------------|---------------|-------------------------|-----------------------------------|-----------------|------------------|---------------|-----------------------|-------------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|--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CASE: UW 160  
WITNESS: LAUREL ANDERSON

**PUBLIC UTILITY COMMISSION  
OF  
OREGON**

**STAFF EXHIBIT 200**

**Testimony in Support of the Stipulation**

**October 30, 2014**

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

3 A. My name is Laurel Anderson. I am a Water Utility Analyst in the  
4 Telecommunication and Water Division of the Utility Program for the Public  
5 Utility Commission of Oregon (Commission). My business address is 3930  
6 Fairview Industrial Drive SE, Salem, Oregon, 97302.

7 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK**  
8 **EXPERIENCE**

9 A. My Witness Qualification Statement is included as Exhibit Staff/201,  
10 Anderson/1.

11 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY AND WHAT TOPICS DO**  
12 **YOU COVER?**

13 A. The purpose of my testimony is to provide support for the Stipulation in  
14 Docket UW 160 entered into by Staff, Sunriver Water LLC (Sunriver or  
15 Company), and Sunriver Owners Association (SROA), hereafter collectively  
16 referred to as the Parties. My testimony covers:

17 1. The separation of Sunriver costs from the costs of Sunriver Environmental,  
18 LLC;

19 2. Crosswater and Caldera Golf Courses (GC or the Golf Courses):

20 a. The separation of the GC expenses and plant, by direct assignment and  
21 allocations, from the expenses and plant borne by the other Sunriver  
22 customers;

23 b. The GC stipulated revenue requirement;

- 1 c. The GC stipulated rates.
- 2 3. Sunriver’s utility plant including Construction Work in Progress (CWIP), and
- 3 rate base;
- 4 4. Sunriver’s management contract with Sunriver Resort, LLP (the Resort);
- 5 and
- 6 5. Sunriver’s employee wages and salaries and pensions and benefits.

7 **Q. DID YOU PREPARE EXHIBITS FOR THIS DOCKET?**

8 A. Yes. I prepared Exhibits Staff/200 and Staff/201, see below:

|    |                             |                          |
|----|-----------------------------|--------------------------|
| 9  | Direct Testimony            | Staff/200, Anderson/1-13 |
| 10 | Witness Qualification Sheet | Staff/201, Anderson/1    |

11  
12 **Q. HOW IS YOUR TESTIMONY ORGANIZED?**

13 A. My testimony is organized as follows:

|    |  |    |
|----|--|----|
| 14 | Issue 1...The Separation of Sunriver and Sunriver Environmental, LLC ..... | 2  |
| 15 | Issue 2...The Golf Courses, Revenue Requirement and Rates.....             | 3  |
| 16 | Issue 3...Staff's Analysis of Sunriver’s Plant and CWIP .....              | 7  |
| 17 | Issue 4...Staff's Analysis of the Management Contract and Accounting       |    |
| 18 | Practices.....   | 10 |
| 19 | Issue 5...Wages and Salaries, Pensions and Benefits .....                  | 12 |

20

21 **ISSUE 1, SEPARATION OF SUNRIVER AND SUNRIVER**

22 **ENVIRONMENTAL, LLC**

23 **Q. PLEASE EXPLAIN WHY SUNRIVER’S PLANT AND EXPENSES ARE**

24 **SEPARATED FROM SUNRIVER ENVIRONMENTAL, LLC’S.**

25 A. Sunriver and Sunriver Environmental, LLC, are both subsidiaries of the Resort.

26 Although Sunriver and Sunriver Environmental, LLC are structured as separate

27 limited liability companies, the two companies share personnel, office space,

1 services, and the same bank account. It is necessary to separate the costs to  
2 determine which of these joint costs should be borne by Sunriver customers.

3 **Q. PLEASE DISCUSS HOW STAFF ACCOMPLISHED THIS SEPARATION**  
4 **AND WHAT ALLOCATION FACTORS WERE USED.**

5 A. Staff used cost allocations that were determined and reviewed in previous rate  
6 filings (UW 29, UW 86, and UW 147). The allocations were based on various  
7 factors such as actual employee time, calculated usage for office equipment, and  
8 historical account information.

9 **Q. DID YOU MAKE ANY ADJUSTMENTS TO THE ALLOCATION OF COSTS**  
10 **BETWEEN SUNRIVER AND SUNRIVER ENVIRONMENTAL, LLC?**

11 A. Yes. Staff reviewed the allocations used by Sunriver in their previous rate case  
12 (UW 147) and agreed that they were reasonable. Staff applied these allocations  
13 to the operating costs. Staff allocated newly purchased plant using the  
14 allocations recommended by Sunriver.

15

16

**ISSUE 2, THE GOLF COURSES**

17 **Q. PLEASE DESCRIBE THE GOLF COURSES (GC) THAT RECEIVE WATER**  
18 **SERVICE FROM SUNRIVER.**

19 A. Sunriver provides water service to two golf courses, Crosswater and Caldera  
20 Springs, through three meters and charges for that water at the tariffed rates.  
21 Each meter is considered a customer for ratemaking purposes. The GC are  
22 irrigated from a combination of water from the main Sunriver water system and

1 a separate irrigation system. The majority of the GC's water is supplied by the  
2 irrigation system.

3 **Q. PLEASE STATE SUNRIVER'S GC TEST YEAR REVENUES AND**  
4 **PROPOSED REVENUES AS STATED IN ITS GENERAL RATE**  
5 **APPLICATION.**

6 A. Sunriver reported GC test year revenues of \$172,673 and proposed revenues  
7 of \$156,086 in its application; thus, requesting a decrease in revenues of  
8 \$16,587.

9 **Q. WHAT ARE THE CURRENT RATES FOR THE GC, AND WHAT RATES DID**  
10 **SUNRIVER PROPOSE FOR THE GC?**

11 A. The GC current rates include a base rate of \$1,699.14 and a commodity rate of  
12 \$0.44 per one thousand gallons of water used resulting in an average monthly  
13 bill of \$3,428.92. Sunriver proposed rates are the same as the current rates.

14 **Q. PLEASE EXPLAIN WHY THERE IS A SEPARATE REVENUE**  
15 **REQUIREMENT FOR THE GC?**

16 A. The separation of the revenue requirement for the GC was established in  
17 UW 118. At that time, Sunriver removed Well No. 12 as a water source from  
18 the main system and solely dedicated it for non-potable usage for the GC due  
19 to its undesirable green tint. Staff continues to separate GC's revenue  
20 requirement in UW 160. Staff separated the revenues, expenses, and plant  
21 associated with the GC from the revenue requirement borne by other  
22 customers. Staff used this separation to establish the GC's own cost of service  
23 and revenue requirement in order to avoid cross subsidization.



1 **Q. PLEASE DISCUSS THE ALLOCATION FACTORS USED TO SEPARATE**  
2 **THE GC UTILITY PLANT FROM SUNRIVER'S TOTAL PLANT.**

3 A. Staff directly assigned plant that was 100 percent dedicated to the GC where  
4 possible, such as Well No. 12. However, Well No. 12 does not always provide  
5 100 percent of the GC's water supply. Therefore, Staff allocated 8.85 percent  
6 of the remaining plant to the GC.

7 **Q. PLEASE EXPLAIN HOW STAFF DEVELOPED THE 8.85 PERCENT**  
8 **ALLOCATION OF PLANT?**

9 A. The 8.85 percent plant allocation to the GC is calculated by comparing the  
10 annual consumption for the GC to the annual consumption for all other  
11 customers from the same sources. Consumption from Well No. 12 is excluded  
12 from this calculation.

13 **Q. WHAT ALLOCATION FACTORS WERE USED TO SEPARATE THE GC'S**  
14 **GENERAL OPERATING EXPENSES?**

15 A. Staff used a three-factor allocation to assign general operating expenses to the  
16 GC as previously established in UW 118. The three factors include the ratio of:  
17 (1) annual water consumption, (2) the total number of meters, and (3) the  
18 dedicated plant assigned to the GC compared to the dedicated plant assigned  
19 to the other customers. Staff applied a 15/70/15 percent split, respectively, as  
20 used in UW 147, to the three factors to calculate a 6.25 percent allocation rate  
21 which was applied to the line item shared operating expenses that were not  
22 directly assigned to the GC.

1 **Q. WHAT PORTION OF THE REVENUE REQUIREMENT AGREED TO BY**  
2 **THE PARTIES IS ASSIGNED TO THE GC?**

3 A. The Parties agreed to a GC revenue requirement of \$123,808, which  
4 represents a 7 percent share of the overall revenue requirement.

5 **Q. WHAT RATES WERE AGREED TO BY THE PARTIES FOR THE GC?**

6 A. The table below shows the Company's proposed rates and the rates stipulated  
7 to by all Parties:

8 **TABLE 1 – SUNRIVER'S CURRENT AND PROPOSED RATES**

| <b>CUSTOMER CLASS</b> | <b>METER SIZE</b> | <b>SUNRIVER PROPOSED BASE RATE</b> | <b>SUNRIVER PROPOSED COMMODITY RATE</b> | <b>STIPULATED BASE RATE</b> | <b>STIPULATED COMMODITY RATE</b> |
|-----------------------|-------------------|------------------------------------|---|-----------------------------|----------------------------------|
| <b>GC</b>             | 3"                | \$1,699.14                         | \$.44 per 1000 gals                     | \$2,235.43                  | \$.31 per 1000 gals              |

9

10 **Q. PLEASE EXPLAIN WHY THE GC COMMODITY RATE IS LOWER THAN**  
11 **THE RESIDENTIAL/COMMERCIAL COMMODITY RATE.**

12 A. Staff designed the GC rates to provide a higher base rate to add financial  
13 stability to the Company during the winter months; thus, lowering the  
14 commodity rate. The GC revenue requirement is allocated at 65 percent to the  
15 base rate; whereas, the residential/commercial revenue requirement is  
16 allocated at 60 percent to the base rate.

17

1 **ISSUE 3, STAFF'S ANALYSIS OF SUNRIVER'S UTILITY PLANT AND CIAC**

2 **Q. PLEASE DISCUSS STAFF ANALYSIS OF SUNRIVER'S UTILITY PLANT.**

3 A. My analysis of Sunriver's plant and CWIP accounts indicated a utility plant of  
4 \$5,095,166 and CWIP of \$2,032,967. One of the major reasons Sunriver filed  
5 for a general rate increase was to update its utility plant and request CWIP for  
6 the first phase of its new reservoir project.

7 **Q. PLEASE DISCUSS YOUR ADJUSTMENTS TO SUNRIVER'S UTILITY**  
8 **PLANT.**

9 A. I adjusted Sunriver's plant to include plant put in service since UW 147 and  
10 other plant adjustments. I calculated the depreciation through 2014. I also  
11 added \$2,032,967 to plant as CWIP for Sunriver's capital improvement  
12 reservoir project. The table below shows Sunriver's test year, Sunriver's  
13 proposed, and Staff's adjusted, utility plant, CWIP, accumulated depreciation,  
14 and net plant.

15 **TABLE 2 – SUNRIVER'S TEST YEAR, PROPOSED, AND STAFF'S**  
16 **ADJUSTMENTS AND PROPOSED PLANT ACCOUNTS**

| <b>CUSTOMER CLASS</b>                 | <b>SUNRIVER TEST YEAR</b> | <b>SUNRIVER PROPOSED</b> | <b>STAFF'S ADJUSTMENTS</b> | <b>STAFF'S PROPOSED</b> |
|---------------------------------------|---------------------------|--------------------------|----------------------------|-------------------------|
| <b>UTILITY PLANT</b>                  | \$5,127,033               | \$5,127,033              | (\$31,867)                 | \$5,095,166             |
| <b>ADD CWIP</b>                       | \$0                       | \$650,000                | \$1,382,967                | \$2,032,967             |
| <b>TOTAL PLANT</b>                    | \$5,127,033               | \$5,777,033              | \$1,351,100                | \$7,128,133             |
| <b>MINUS ACCUMULATED DEPRECIATION</b> | \$2,855,167               | \$3,032,341              | (\$20,307)                 | \$3,012,034             |
| <b>NET PLANT</b>                      | \$2,271,866               | \$2,744,692              | \$1,371,407                | \$4,116,099             |

17

1           **PLEASE DESCRIBE CWIP.**

2           A. CWIP is a ratemaking methodology that provides funding for capital  
3           improvements through rates. It allows the Commission to include utility plant that  
4           is not yet in service in the rate base. ORS 757.355(1) restricts public utilities  
5           from including plant in rates if it is not actually serving the customers. However,  
6           ORS 757.355(2) exempts water utilities from section (1) allowing the Commission  
7           to include the cost of a specific capital improvement in rates as CWIP. CWIP  
8           must be in the public interest and the additional water revenue it generates can  
9           only be used for the purpose of completing the capital improvement.

10          **Q. PLEASE DISCUSS SUNRIVER'S CAPITAL IMPROVEMENT RESERVOIR**  
11          **PROJECT.**

12          A. Sunriver's water system currently has 2.0 million gallons of water storage. The  
13          current phase of the reservoir project will add 1.25 million gallons of storage  
14          capacity. The next phase of the project will add another 1.25 million gallons of  
15          storage at full build out. The project will also provide equalization between  
16          pump capacity and peak user demand.

17          **Q. WHAT ANALYSIS DID THE COMPANY UNDERTAKE TO DEMONSTRATE**  
18          **THE NEED FOR THE INCREASED STORAGE?**

19          A. Sunriver conducts Water Master Plans periodically to ensure it has adequate  
20          water supply for its customers. The current Master Plan calls for an increase in  
21          total storage. Sunriver's 2000 Water Master Plan by CH2MHill recommended  
22          4.03 million gallons of total storage with a new reservoir at the north end of the  
23          property.

1 A 2011 review by the engineering firm WH Pacific generally agreed with the  
2 previous findings to increase storage; however, WH Pacific recommended a  
3 total of 4.5 million gallons of total storage. It was further recommended that  
4 storage for fire protection should be 1.2 million gallons year round. Adding 1.25  
5 million gallons with the new reservoir will increase emergency/equalization  
6 storage to an amount which can cover either peak day equalization or an off  
7 peak day emergency, but not both.

8 The project was also reviewed by Angle Consulting Engineering, LLC for the  
9 Intervener, SROA. SROA agrees that the project is appropriate for Sunriver to  
10 continue to supply safe and adequate water to its customers and is a benefit to  
11 all customers.

12 **Q. WHAT DO YOU CONCLUDE FROM THE ENGINEERING REPORTS?**

13 A. The endorsements of the project by the engineering firms and the SROA  
14 support the project as prudent and in the public interest. Furthermore, the  
15 ramifications for failure to invest in the reservoir could be dire in the instance of  
16 a fire or other natural disaster.

17 **Q. PLEASE EXPLAIN WHY STAFF ADJUSTED CWIP TO INCLUDE MORE**  
18 **THAN THE COMPANY INITIALLY PROPOSED IN ITS APPLICATION.**

19 A. In its application, Sunriver requested \$650,000 for a portion of the project's  
20 current phase that was to be completed in the summer of 2015. I adjusted  
21 CWIP to include the entire current phase of the reservoir project that will be  
22 completed in June 2015 at an estimated cost of \$2,032,967. Given the critical  
23 need for the additional storage, it was prudent to include the entire phase in

1 CWIP. After the project is completed, Staff will verify the actual cost of the  
2 improvement and will replace the CWIP projected cost with the actual cost in  
3 the Company's next rate case.

4 **Q. DID THE PARTIES AGREE TO INCLUDE THE ENTIRE PHASE OF THE**  
5 **PROJECT IN CWIP?**

6 A. Yes, the Stipulating Parties agreed to add \$2,032,967 in plant as CWIP.

7

8 **ISSUE 4, STAFF'S ANALYSIS OF THE MANAGEMENT CONTRACT**

9 **Q. DID STAFF REVIEW THE AFFILIATED INTEREST MANAGEMENT**  
10 **CONTRACT BETWEEN SUNRIVER AND THE RESORT?**

11 A. Yes, I reviewed the affiliated interest Management Contract (Contract) from its  
12 inception in 1998 to the current Contract, dated July 24, 2002, Docket No.  
13 UI 168.

14 The Commission's approval of the Contract included the Commission's right to  
15 review for reasonableness all financial aspects of the arrangement. Docket No.  
16 UI 168, Commission Order No. 98-173 issued on April 24, 1998, required the  
17 Resort and Sunriver Environmental, LLC to maintain records to show the cost  
18 of goods and services provided to Sunriver.

19 Commission Order No. 02-662, dated September 20, 2002, approved a revised  
20 Contract that references back to UI 168. The revised Contract included an  
21 Addendum of Responsibilities (Addendum) listing the services the Resort is to  
22 provide to Sunriver under the Contract.

1 **Q. DOES THE COMMISSION HAVE THE AUTHORITY TO INVESTIGATE**  
2 **AFFILIATED INTEREST CONTRACTS?**

3 A. Yes. The Commission by Statute is granted the right to investigate affiliated  
4 interest contracts with another company with relation to the construction,  
5 operation, maintenance or use of the property of a public utility in Oregon.

6 ORS 757.490 (3) states:

7 In making such investigation the commission and accountants,  
8 examiners and agents, appointed by the commission for the purpose,  
9 shall be given free access to all books, books of account, documents,  
10 data and records of the public utility as well as of the corporation with  
11 which it is proposing to contract, which the commission may deem  
12 material to the investigation. The failure or refusal of either of the parties  
13 to the proposed contract to comply with this subsection is prima facie  
14 evidence that such contract is unfair, unreasonable and contrary to  
15 public interest, and is sufficient to justify a determination and finding of  
16 the commission to that effect, which has the same force and effect as  
17 any other determination or order of the commission.

18  
19 **Q. PLEASE DISCUSS YOUR INVESTIGATION OF THE CONTRACT.**

20 A. In response to Staff's data requests for information regarding the costs  
21 associated with the services provided to Sunriver through the Contract, Staff  
22 found Sunriver's documentation too general or unrelated to the specific costs of  
23 providing the services to allow Staff actual verification of the costs.  
24 Staff also requested Sunriver's financial statements for 2011, 2012, and 2013  
25 to include balance sheets, income statements, and statements of cash flows.  
26 These statements are required to be provided in the current Contract under the  
27 Addendum, Item No. 4. The Company's response to Staff's data request stated  
28 that these statements were not available.

1 **Q. WHAT IS STAFF'S ANALYSIS OF THE MANAGEMENT CONTRACT?**

2 A. Staff calculated a new contract expense by beginning with the 2010 cost of the  
3 Contract as reported of \$140,820 and applying a three percent annual increase  
4 to arrive at an annual Contract expense of \$153,826. The three percent  
5 increase is within the range of escalation values (three percent to seven  
6 percent) included in the contract.

7 **Q. WHAT MANAGEMENT CONTRACT EXPENSE DID THE PARTIES AGREE**  
8 **TO?**

9 A. The Parties agreed to a Management Contract Expense of \$166,401. This  
10 amount was negotiated by the Parties in context of an overall settlement.

11 **Q. DID STAFF HAVE ANY CONCERNS REGARDING SUNRIVER'S**  
12 **ACCOUNTING AND TRACKING OF THE COSTS ASSOCIATED WITH THE**  
13 **CONTRACT AND WERE THEY ADDRESSED IN THE STIPULATION?**

14 A. Yes, as agreed to in the Stipulation, Sunriver will separate its accounting from  
15 the accounting of Sunriver Environmental, LLC and the Resort. To accomplish  
16 this, separate balance sheets, income statements, and statements of cash flow  
17 for Sunriver must be submitted to the Commission on a quarterly basis until  
18 December 31, 2016, and annually thereafter.

19

20

**ISSUE 5, SALARIES AND BENEFITS**

21 **Q. DID YOU REVIEW ANY OTHER TEST YEAR EXPENSES?**

22 A. Yes, I reviewed Sunriver's Salaries and Wages and Employee Pension and  
23 Benefits Expenses. In my review, I found that the Company had included



1 accrued vacation in the Salaries and Wages Expense that inflated the wages.

2 The total wages and salaries shown for the test year was \$463,539 compared to  
3 the total per the W-2 forms of \$393,778, a difference of \$69,761.

4 **Q. WHAT ADJUSTMENTS DID STAFF MAKE TO SALARIES AND WAGES**  
5 **EXPENSE?**

6 A. I excluded the accrued vacation from the Wages and Salary Expense. In  
7 addition, two new employees' wages were added, and the salary of one  
8 employee of an affiliate that should be included in the Contract rather than  
9 Wages and Salary Expense was disallowed. Wages were then adjusted to  
10 provide a two percent raise. Staff decreased the wages by \$37,100. The  
11 Stipulation adopts Staff's analysis and has annual Wages and Salary expense of  
12 \$493,117.

13 **Q. WERE THE EMPLOYEE PENSION AND BENEFITS EXPENSES ALSO**  
14 **ADJUSTED?**

15 A. Yes, Staff recalculated employee benefits using Form W-2 wages. This resulted  
16 in a reduction of \$75,112 in employee pension and benefits. The Stipulation  
17 adopts Staff's analysis and has annual Pension and Benefits expense of  
18 \$110,295.

19 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

20 A. Yes.

CASE: UW 160  
WITNESS: LAUREL ANDERSON

**PUBLIC UTILITY COMMISSION  
OF  
OREGON**

**STAFF EXHIBIT 201**

**Witness Qualifications Statement**

**October 30, 2014**

WITNESS QUALIFICATION STATEMENT

NAME: LAUREL ANDERSON, CPA

EMPLOYER: PUBLIC UTILITY COMMISSION OF OREGON

TITLE: UTILITY ANALYST, TELECOMMUNICATIONS AND WATER DIVISION

ADDRESS: 3930 FAIRVIEW INDUSTRIAL DRIVE, SE  
SALEM, OR 97302-1166

EDUCATION: Certified Public Accountant

Bachelor of Science, Business, Accounting  
Montana College of Mineral Science and Technology

Bachelor of Science, Agriculture, Animal Science  
Montana State University

EXPERIENCE: Oregon Public Utility Commission since May 2007  
Budget Analyst – May 2007 to July 2013  
Utility Analyst – August 2013 to Present

Oregon Department of Human Services  
Budget Analyst-May 2005 to May 2007

Oregon Employment Department  
Employment Tax Auditor—October 2003 to April 2005

LaCie, Limited  
Senior Corporate Accountant

Oxford Molecular Group  
Business Segment Accountant

Fifteen years of Public Accounting experience including income tax, small  
business accounting, and municipal auditing

CERTIFICATE OF SERVICE

UW 160

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 860-001-0180, to the following parties or attorneys of parties.

Dated this 30th day of October, 2014 at Salem, Oregon

*Kay Barnes*

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Kay Barnes  
Public Utility Commission  
3930 Fairview Industrial Drive SE  
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UW 160  
SERVICE LIST

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