
**PUBLIC UTILITY COMMISSION
OF OREGON**

UW 119

**STAFF DIRECT TESTIMONY
In Response to
Commission Direction to
Supplement Record**

**In the Matter of
AGATE WATER COMPANY
Application for Rate Increase**

July 18, 2007

OLMIS Wage Survey and AWWA Water Utility Compensation Survey

In developing the stipulated wages for Agate Water System (Agate or Company), Staff employed two sources to determine proxy market rates for Agate's owner and Agate's employees. Staff used the Oregon Labor Market Information System (OLMIS), published by the Oregon Employment Department, and the American Water Works Association (AWWA) 2006 Water Utility Compensation Survey. Both OLMIS and AWWA focus on wages. Because Agate does not provide pension and benefits to its current employees, the references are reasonable sources to determine market wages for water utility personnel.

OLMIS

The OLMIS web site provides economic information to employers, job seekers, students, policy makers, analysts, and others. The web site is designed to give users access to the Employment Department's information resources free of limitations due to time or location. OLMIS can be assessed at www.qualityinfo.org.¹

The OLMIS occupation data base is based on common occupations and wages that are determined by the Oregon Wage Information (OWI). According to the Oregon Employment Department, OWI represents the most comprehensive collection of Oregon Wage data available and offers a broad spectrum of wage rates from many sectors of Oregon's economy, and is designed to assist job

¹ OLMIS definitions.

seekers, employers, career planners, and others needing Oregon wage rates for specific occupations. An occupation is a collection of jobs with similar duties, regardless of industry; and most occupations are found in more than one industry.² Although the specific job titles of Agate personnel may not exactly match the title of the occupation, Staff identified related occupations as a proxy for the Agate employee job title. Table 1 highlights both the OLMIS and AWWA occupations chosen by Staff. Although there is some subjectivity in choosing the closest occupation, Staff closely matched OLMIS and AWWA occupations with the activities performed by Agate employees. In its testimony, and highlighted in the tables below, Staff determined the percentile level of pay based on the employees' experience.

AWWA Compensation Survey

AWWA conducts compensation surveys for the water utility industry. The 2006 Annual survey was the eleventh survey published by AWWA. According to AWWA's 2006 survey:

The Water Utility Compensation Survey continues to provide the most extensive study of salaries, variable compensation, salary ranges and compensation practices in the water utility industry. This year, 875 organizations participated, supplying data for 16,336 employees...³

The survey classifies water utilities by type of utility, type of ownership, size (population served), average gallons managed, and total employment. Private water utilities only represent 2 percent of the respondents, while Board-

² OLMIS definitions.

³ 2006 AWWA Water Utility Compensation Survey, page iv.

Operated utilities⁴ represent 43 percent of respondents. City/County and Other water utilities represent the remaining 55 percent of the respondents. Because private water utilities represent such a small percentage of total water utilities surveyed, and because 20 of the 28 water utilities rate regulated by the Commission are Class C water utilities (less than \$200,000 in annual revenue), Staff only uses the AWWA survey to substantiate OLMIS results. With that said, the AWWA survey is still a relevant source since 69 percent of the water utilities surveyed manage less than 10 millions of gallons daily; and 45 percent of the water utilities surveyed employ less than 25 personnel.

Results of Using AWWA and OLMIS Data

In the case of Agate, Staff assigned to the rate case used results from the 10 to 25 million gallons managed classification. Staff should have been more precise and used the less than 10 millions gallons managed or less than 25 total employment classifications. However, and as the following tables highlight, the recalculated combined OLMIS and AWWA results doesn't change the overall UW 119 analysis. Although Fred Schilling's hourly rate is slightly higher than the calculated market wage, total employment costs are well below market levels. As such, the recommended overall wages do not require any reductions as a result of using the different classifications.

Table 2 uses the AWWA data for less than 25 employees. Staff chose this category instead of less than 10 millions gallons managed, because the less

⁴ The Commission currently rate regulates two Board-Operated water utilities (Crooked River Ranch Water Company and Metolius Meadows Property Owners Association).

than 25 employees resulted in the lower market cost estimates. Staff used the same assumptions as used in UW 119 concerning percentile wages for OLMIS and salary wages for AWWA based on relevant years of experience. Table 1 highlights the specific occupation used for each employee. The years represent the years employed by Agate. Table 2 highlights the recalculated market wage, which is the average of the AWWA, Less than 25 Employees, wage and the OLMIS wage.

Table 1 –OLMIS and AWWA Occupations

Employee / Years	OLMIS Occupation	AWWA Occupation
Fred Schilling / 27 years	General and Operations Managers (90 th Percentile)	Top Operations and Maintenance Executive (Maximum)
Drew Johnson / 15 years	First Line Supervisor / Manager Construction Trades (75 th Percentile)	Water Operations Manager (Middle)
Lynn Johnson / 16 years	First Line Supervisor / Manager of Office Administrative Services (75 th Percentile)	Administrative Services Manager (Middle)
Brandon Johnson / 4 years	Plant & Systems Operators (50 th Percentile)	Intermediate Water Treatment Plant Operator (Minimum)
Laura Coates / 5 years	Office and Administrative Support Workers (50 th Percentile)	N/A
Greg Carder / <1 year	Maintenance and Repair Worker General, All Others (50 th Percentile)	Entry Level Water Treatment Plant Operator (Minimum)
Irven Howell / 8 years	Installation, Maintenance and Repair Worker, All Others (50 th Percentile)	Entry Level Water Treatment Plant Operator (Minimum)
Marybeth Schilling / 27 years	Bookkeeping, Accounts & Auditing Clerks (90 th Percentile)	Associate Accountant (Entry - Maximum)

Table 2 – Recalculated OLMIS and AWWA Comparison of Wages

Employee	UW 119 AWWA Market Data	AWWA Less than 25 employees	OLMIS Wage	Recalculated Market Wage	UW 119 Wage	Difference *
Fred Schilling	\$48.66	\$40.93	\$63.19 ##	\$52.06	\$53.76	(\$1.70)
Drew Johnson	\$33.51	\$27.31	\$26.83	\$27.07	\$17.33	\$9.74
Lynn Johnson	\$22.69	\$19.91	\$22.01	\$20.96	\$14.34	\$6.62
Brandon Johnson	\$18.74	\$16.38	\$19.52	\$17.95	\$11.95	\$6.00
Laura Coates**	N/A	N/A	\$14.73	\$14.73	\$14.11	\$0.62
Greg Carder	\$18.74	\$16.38	\$14.23	\$15.31	\$12.43	\$2.88
Irven Howell	\$16.82	\$15.40	\$15.50	\$15.45	\$8.67	\$6.78
Marybeth Schilling#	\$22.70	\$21.65	\$18.57	\$20.11	\$18.50	\$1.61
Average	\$25.98	\$22.57	\$24.32	\$22.96	\$18.89	\$4.07

* The Difference column is the recalculated market wage minus the UW 119 Wage recommended by Staff and stipulated by the Stipulating Parties. A positive amount indicates that the market wage is higher than the recommended wage.

** The AWWA compensation survey did not include a proxy position for Laura Coates.

The AWWA Entry Level Accountant, Less than 25 Employees, did not contain any data so Staff used the < 10 million gallons managed data for Marybeth Schilling.

The OLMIS wage was obtained in 2006. The updated 2007 OLMIS 90th percentile wage for this position increased to \$70.31.

As the table indicates, the average wages paid to Agate employees (\$18.89) is \$4.07 less than the recalculated market rate (\$22.96) based on the average of OLMIS and AWWA wage rates. Considering that Agate employs 7.0 full-time equivalents (FTE), the overall annual savings to customers, based on

the lower wages, is \$59,145.⁵ Staff has attached both OLMIS and AWWA data, and a description of Agate's employees' relevant experience.

Additionally, the table above illustrates that Mr. Schilling's hourly pay (based on 0.5 FTE) is \$1.70 higher than market. However, the following information should be considered by the Commission when determining the proper remuneration for Mr. Schilling:

1. Based on information filed by the Company, Mr. Schilling has been working, on average, 20 to 30 hours per week. If Mr. Schilling was paid for 30 hours per week at the recalculated market rate, his annual pay would be \$81,214. Looking at this from another perspective, if Mr. Schilling works 30 hours per week, his annual recommended UW 119 pay of \$55,800 would equal \$35.77 per hour.
2. Mr. Schilling, as owner of the Company, is ultimately responsible and accountable for all aspects of Agate's operations. This inherent risk of ownership should place a greater value on his services than that of an employed/contracted Operations and Maintenance Executive.
3. Staff's recommended revenue requirement in UW 119 includes a 1 percent rate of return on a rate base of \$3,167,532.⁶ Since this 1 percent rate of return is designed to produce only enough income to pay the Safe Drinking Water Revolving Loan Fund (SDWRLF) interest costs, Mr. Schilling will be severely restricted in any dividend distributions as the majority stockholder. As a result, the wage most likely represents the all-in income that Mr. Schilling will receive for his employment and ownership of Agate.
4. The Bureau of Labor Statistics (BLS), May 2006 State Occupational and Employment Wage Estimates for Oregon,⁷

⁵ 1.0 FTE works 2,076 hours per year; therefore 7.0 FTE * 2,076 hours * \$4.07 per hour equals \$59,145.

⁶ The 1 percent rate of return is based on the SDWRLF. The recommended rate base does not include a \$250,000 loan forgiveness from the Oregon Economic and Community Development Department.

⁷ Bureau of Labor Statistics, U.S. Department of Labor, http://stats.bls.gov/oes/current/oes_or.htm#b11-0000

lists the mean hourly wage for Chief Executives at \$64.94; and the mean hourly wage for General and Operations Managers at \$45.58. Since Mr. Schilling's job duties reflect responsibilities of both positions, the blended wage is \$55.26. This amount is higher than both the stipulated rate and the rate calculated in Table 2 above. As a note, both Staff/100, Miller-Dougherty/17 and Commission Order No. 07-188 (UI 263), Appendix A, page 2 of 23 point to the mix duties of Mr. Schilling as a manager/operator/officer.

As discussed in testimony and briefs, Agate's current employees (including Mr. Schilling) are not receiving any benefits or pension contributions. The BLS, Employer Costs for Employee Compensation,⁸ places wages for Management, business, and financial at approximately 70 percent of total compensation for private industry management occupations. The remaining 30 percent consists of benefits including insurance, retirement savings, paid leave, and other benefits. If Staff removes the loading for paid leave, the benefit loadings are 21 percent of total pay. As a result, the recommended wage without benefits for Mr. Schilling of \$53.76 is comparable to a wage of \$42.47 with benefits. Because of lower than market wages and no benefit costs, the overall wages stipulated by the parties are fair and reasonable.

⁸ Bureau of Labor Statistics, U.S. Department of Labor, <http://stats.bls.gov/news.release/ecec.t11.htm>

Conclusion

Staff appreciates the opportunity to more thoroughly demonstrate that the wages recommend by Staff, and stipulated to by the Company, are fair and reasonable. In addition, wages are only one component of operating expenses. As Staff demonstrated in Staff/100, Miller-Dougherty/19, Agate's total operating expense per year per customer is lower than the two comparable companies of similar size in Central Oregon. Therefore, the proposed overall rates remain just and reasonable.

Wages

for General And Operations Managers

Region	----- 2007 Wages -----						
	Percentiles (hourly wages)					Avg Hourly (\$/hr)	Avg Annual
	10th	25th	50th (median)	75th	90th		
Oregon Statewide	\$21.24	\$28.45	\$39.66	\$57.08	NA	\$46.22	\$96,145
Crook / Deschutes / Jefferson	21.51	26.75	34.66	45.37	70.31	40.10	83,392

Water Utility Compensation Survey - 2006

Job 03 - Top Operations & Maintenance Executive

Summary of All Reported Data by Ownership/Management Type

Type	Average Salary Range								
	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Min	Mid	Max
Board Operated	73	69	37	\$88,200	\$89,899	\$89,899	\$78,182	\$94,116	\$109,621
City/County	36	33	101	\$84,968	\$82,247	\$82,247	\$72,235	\$86,029	\$101,827
Private	5	5	*	\$116,500	\$137,480	\$137,480	*	*	*
Other	4	4	*	*	*	*	*	*	*
All	118	111	57	\$87,192	\$89,924	\$89,924	\$75,989	\$91,850	\$107,168

Summary of All Reported Data by Population Size

Type	Average Salary Range								
	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Min	Mid	Max
Over 250,000	22	21	139	\$112,099	\$120,841	\$120,841	\$92,096	\$115,202	\$134,984
100 - 250,000	14	14	98	\$102,078	\$98,698	\$98,698	\$83,721	\$101,080	\$112,200
50 - 100,000	20	17	63	\$89,700	\$101,433	\$101,433	\$77,331	\$95,451	\$107,440
25 - 50,000	24	24	11	\$76,872	\$79,539	\$79,539	\$61,795	\$73,489	\$89,587
10 - 25,000	27	24	11	\$74,612	\$73,528	\$73,528	\$66,757	\$74,118	\$90,541
< 10,000	11	11	4	\$54,000	\$60,378	\$60,378	*	*	*

Summary of All Reported Data by Average Gallons Managed

Type	Average Salary Range								
	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Min	Mid	Max
Over 250	5	5	*	\$100,700	\$99,187	\$99,187	*	*	*
100 - 250 Mill	8	8	193	\$123,177	\$133,975	\$133,975	\$99,765	\$120,799	\$142,967
50 - 100 Mill	11	10	79	\$111,050	\$128,134	\$128,134	\$91,364	\$114,659	\$129,652
25 - 50 Mill	14	13	80	\$108,750	\$105,341	\$105,341	\$80,638	\$98,918	\$116,993
10 - 25 Mill	17	15	35	\$89,700	\$91,081	\$91,081	\$77,798	\$93,703	\$101,023
< 10 Mill	63	60	12	\$73,078	\$73,281	\$73,281	\$61,281	\$72,340	\$86,483

Summary of All Reported Data by Total Employment

Type	Average Salary Range								
	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Min	Mid	Max
Over 500	10	9	348	\$129,881	\$128,966	\$128,966	\$124,623	\$156,650	\$178,972
200 - 500	13	13	80	\$103,576	\$115,392	\$115,392	\$83,094	\$102,577	\$116,486
100 - 200	12	12	54	\$104,398	\$109,597	\$109,597	\$74,366	\$90,835	\$109,032
50 - 100	18	15	42	\$104,435	\$95,285	\$95,285	\$81,570	\$107,410	\$112,262
25 - 50	15	15	17	\$86,388	\$84,643	\$84,643	\$65,499	\$73,585	\$94,035
< 25	50	47	9	\$69,510	\$70,355	\$70,355	\$61,336	\$70,776	\$84,989

AGATE WATER COMPANY

July 16, 2007

Re: Agate Water Employees

Dear Sir or Madam:

Listed below are the employees and the year's experience.

1. Laura Cortes- 5 years with Agate Water Company. Laura had no prior experience with a water utility until coming to Agate Water Company. She has 24 years experience with customer service, 5 years manager and leadership skills, 4 years student in Spanish.
2. Greg Carder- 10 months with Agate Water Company. Greg had no prior experience in the water utility until coming to Agate Water Company. Greg has 36 years experience welding, 34 years heavy equipment operation, 23 years carpentry, 20 years electrical, 20 years telecommunication, 6 years customer service, and 4 years machinist.
3. Brandon Johnson- 4 years with Agate Water Company. Brandon had some prior experience do to growing up in a family run business.
4. Irvin Howell-8 years with Agate Water Company. Irv had some knowledge of the small water system that Agate Water Company purchased from Roat's. He has spent years working with irrigation water and some plumbing.
5. Lynn Johnson-16 years with Agate Water Company. I started helping my parents when the company first started in 1980 with meter reading, billings, posting payments, filing, banking, answering phone calls and taking messages.
6. Drew Johnson- 15 years with Agate Water Company. Drew had no prior experience with a water utility until coming to work for Agate Water Company. Prior to working for Agate Water Company Drew spent 4 years in golf course construction, 2 years heavy equipment operation and 2 light equipment operation. 3 years landscape, and a Bachelors degree in early education.

Sincerely,

Lynn Johnson
Office Manager Agate Water Company

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