

CASE: UW 196  
WITNESS: YAMADA-PUTTMAN

**PUBLIC UTILITY COMMISSION  
OF  
OREGON**

**EXHIBIT 200**

**Joint Reply Testimony  
in Support of Stipulation**

**January 11, 2024**

1 **Q. Please state your names and qualifications.**

2 A. My name is Stephanie Yamada. I am a Senior Utility Analyst in the Rates  
3 and Telecommunications Section of the Rates, Safety and Utility  
4 Performance Program of the PUC. My witness qualification statement is  
5 included in Stipulating Parties/101.

6 My name is Thomas J. Puttman, PE, AICP, LEED AP. I have served as  
7 Manager of Seavey Loop Water Company, LLC since its acquisition in 2018. I  
8 am a licensed professional engineer and certified planner, specializing in utility  
9 investment, development, and management. I currently manage a portfolio of  
10 utilities across the western US.

11 **Q. Are you the same witnesses who previously submitted Joint Testimony**  
12 **in Support of the Stipulation in this docket on behalf of Seavey Loop**  
13 **(Seavey Loop or Company) and Staff of the Public Utility Commission**  
14 **of Oregon (Staff), collectively the Stipulating Parties?**

15 A. Yes.

16 **Q. What is the purpose of your joint reply testimony?**

17 A. The purpose of this testimony is to respond to the testimony and objections to  
18 the Stipulation of Intervenors Carrie Rose<sup>1</sup> and Diana Chin.<sup>2</sup>

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<sup>1</sup> See *In re Seavey Loop, Request for a General Rate Revision*, Docket No. UW 196, Intervenor Carrie Rose's Testimony Opposing Stipulation, <https://edocs.puc.state.or.us/efdocs/HTB/uw196htb325472023.pdf>.

<sup>2</sup> See *In re Seavey Loop, Request for a General Rate Revision*, Docket No. UW 196, Opposition to Stipulation between Staff and Company by Intervenor Chin, <https://edocs.puc.state.or.us/efdocs/HAR/uw196har141252.pdf>.

1 **Q. Are Ms. Chin and Ms. Rose the only Intervenor who object to the**  
2 **Stipulation?**

3 A. Yes. The remaining intervenor, Yeager St. John, did not submit testimony or  
4 objections in opposition of the Stipulation.

5 **Q. Did you prepare any exhibits for this docket?**

6 A. Yes. The Stipulating Parties prepared Exhibit Stipulating Parties/201 (Fencing  
7 Photos), consisting of two pages, and Exhibit Stipulating Parties/202 (Plant  
8 Summary), consisting of two pages.

9 **Q. How is your testimony organized?**

10 A. Our testimony is organized as follows.

11	Exhibit 200	
12	Issue 1 – Overview of Stipulating Parties’ position .....	3
13	Issue 2 – Ratemaking Process and Formula .....	5
14	Table 1: Recent Small Water Company Rate Base Amounts .....	7
15	Table 2: Recent Small Water Company RORs .....	8
16	Issue 3 – Inclusion of Specific Expenses in Rates .....	10
17	Table 3: Test Year Landscaping Expenses .....	15
18	Exhibit 201 – Fencing Photos .....	1-2
19	Exhibit 202 – Plant Summary.....	1-2

1                    **ISSUE 1 – OVERVIEW OF STIPULATING PARTIES’ POSITION**

2                    **Q. Please summarize the recommendations you make in your testimony.**

3                    A. The Stipulating Parties recommend that the Public Utility Commission of  
4                    Oregon (OPUC or Commission) adopt the Stipulation filed in UW 196 in its  
5                    entirety, with no adjustments. The Stipulating Parties contend that the  
6                    Stipulation is in the public interest and results in just and reasonable rates.

7                    **Q. Please provide an overview of the Stipulation.**

8                    A. The Stipulation entered between Staff and the Company was filed on  
9                    November 9, 2023, and resolves all issues in this docket. The Stipulating  
10                    Parties agreed to a total revenue requirement of \$40,291, representing an  
11                    increase of 65.21 percent, or \$15,904, compared to test year revenues of  
12                    \$24,387. The revenue requirement is based on a 7.75 percent Rate of Return  
13                    (ROR) on a rate base of \$135,030. As the system is not currently metered, the  
14                    stipulated rates include only a monthly base rate, with no variable rate  
15                    component. Consequently, all customers would experience the same flat rate  
16                    increase from \$56.99 to \$88.02 per month, or approximately 54.45 percent.

17                    **Q. What is the Stipulating Parties’ understanding of Intervenors’  
18                    opposition to the Stipulation?**

19                    A. After reading the objections to the Stipulation and testimony filed by Carrie  
20                    Rose and Diana Chin, the Stipulating Parties understand that these  
21                    intervenors are concerned both with the process and formula used to  
22                    establish rates for Seavey Loop as well as the inclusion of specific costs in  
23                    customer rates. Although the Stipulating Parties may not necessarily agree

1       on the calculations, assumptions, or bases used to determine each  
2       adjustment, we believe the amounts represent a reasonable financial  
3       settlement of all issues in this docket. The adjustments are in the public  
4       interest and are consistent with rates that are fair, just, and reasonable  
5       given the disparate views of the parties.

**ISSUE 2 – RATEMAKING PROCESS AND FORMULA**

1  
2 **Q. How do you respond to Ms. Rose’s argument that the Company “didn’t**  
3 **have to explain their costs publicly,” thereby “low[er]ing the**  
4 **requirements of the Water Company to prove the validity and necessity**  
5 **of their expenses”?**

6 A. Customers had ample opportunity to examine the Company’s specific costs in  
7 this case. While Staff generally considers settlement discussions to be  
8 confidential, none of the information in this docket carried a confidential  
9 designation until more than six months after the opening of this docket. While  
10 the Company filed a Notice of Use of General Protective Order in this docket  
11 on November 6, 2023, to protect its affiliate Services Agreements prior to the  
12 publishing of the Stipulation and Joint Testimony, that remains the only  
13 protected information in this case.

14 The Stipulating Parties note that, on April 28, 2023, the Company filed  
15 216 pages of exhibits in this docket containing the invoices supporting the  
16 costs in this case.<sup>3</sup> These invoices have been publicly accessible on the PUC  
17 website throughout the duration of this docket and remain so today.  
18 Additionally, all customer comments received by both the Commission and the  
19 Company regarding this rate case were provided in Stipulating Parties/105. As  
20 shown there, other than Ms. Rose, no customers reached out with specific  
21 questions about cost inclusions in this case.

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<sup>3</sup> *In re Seavey Loop, Request for a General Rate Revision*, Docket No. UW 196, Seavey Loop Water Company’s Exhibits A through D to Initial Application,  
<https://edocs.puc.state.or.us/efdocs/HAS/uw196has10917.pdf>.

1           Finally, the requirements for the Company to “prove the validity and  
2           necessity of their expenses” were not lowered in this case. Staff performed a  
3           detailed review of the Company’s cost inclusions, as it would in any rate case.

4           **Q. How do you respond to Ms. Rose’s assertion that the revenue  
5           requirement formula “incentivizes overspending by the Water  
6           Company” as the “profit is based entirely on the amount of their  
7           capital expenditures”?**

8           A. The Stipulating Parties agree that, under the standard ratemaking  
9           methodology, a utility’s after-tax profit is calculated by multiplying the return  
10          on equity (ROE) percentage by the utility’s rate base. Consequently, an  
11          increase in net plant will increase rate base, which will in turn result in an  
12          increase to the utility’s profits. However, the Stipulating Parties maintain that  
13          the assets included in the stipulated rate base meet the OPUC ratemaking  
14          standard practice criteria for inclusion in rates.

15          The Company asserts the assets were necessary, are currently “used  
16          and useful,” and were prudently incurred. Staff reviewed documentation  
17          provided by the Seavey Loop to support the cost of each of these assets.  
18          The Stipulating Parties note that, while Ms. Rose states that the  
19          Commission should only allow “the company to raise rates for expenses that  
20          are truly necessary for the functioning of the well,” she does not identify any  
21          specific assets that should be excluded from rate base. The spreadsheet  
22          containing all assets included in the Stipulating Parties’ agreed-upon rate

1 base was previously provided via email to all parties in this case, including  
2 Ms. Rose, and is included in this docket as Stipulating Parties/202.

3 **Q. How do you respond to Ms. Chin's assertion that some of the**  
4 **Company's capital improvements were "unreasonable and**  
5 **unnecessary and had nothing to do with providing clean and safe**  
6 **water"?**

7 A. Ms. Chin did not specify any particular capital improvement with regard to this  
8 assertion but discussed security fencing and landscaping improvements  
9 elsewhere in her testimony. As discussed throughout our testimony, the  
10 Stipulating Parties maintain that the installation of security fencing was  
11 necessary for protecting the provision of clean and safe water. Furthermore,  
12 the landscaping improvements cited by Ms. Chin were removed from rate base  
13 and are not included in the stipulated rates. The total asset cost reflected in the  
14 stipulated revenue requirement, and the resulting rate base amount, is not  
15 unusual for a utility of Seavey Loop's size. The stipulated rates result in a rate  
16 base of \$3,649 per customer, which is in line with other recent Commission-  
17 approved rates for similarly small water utilities, as summarized in the following  
18 table.

<b>Docket</b>	<b>Water Company</b>	<b>Customers</b>	<b>Rate Base</b>	<b>Rate Base per Customer</b>
UW 197	Lakeshore	49	\$272,499	\$5,561
UW 196	Seavey Loop	37	\$135,030	\$3,649
UW 190	Helton Tracks	29	\$94,306	\$3,252
UW 180	Hillview	15	\$38,499	\$2,567
UW 179	Shadow Wood	64	\$267,365	\$4,178



1 **Q. How do you respond to Ms. Chin’s assertion that the ROR “should be**  
2 **lower than 7.75%” and that a “reasonable Rate would be 5% or less”?**

3 A. The stipulated ROR of 7.75 percent is reasonable. As demonstrated in  
4 Stipulating Parties/100, this amount is based on a 6.0 percent cost of debt and  
5 a 9.5 percent ROE. While Seavey Loop has no debt, the stipulated ROR  
6 includes hypothetical debt as 50 percent of the Company’s capital structure.  
7 Due to the lower rate associated with debt as compared to equity, this use of  
8 hypothetical debt has the effect of lowering the overall ROR. The stipulated  
9 ROR in this case is lower than that the ROR permitted for similarly small water  
10 utilities in other recent Commission decisions, as summarized in the following  
11 table.

<b>Docket</b>	<b>Water Company</b>	<b>Customers</b>	<b>ROR</b>
UW 197	Lakeshore	49	7.63%
UW 196	Seavey Loop	37	7.75%
UW 190	Helton Tracks	29	9.50%
UW 180	Hillview	15	9.50%
UW 179	Shadow Wood	64	9.50%

12 The Stipulating Parties also note that Ms. Chin cites no evidence to support  
13 her suggested ROR of five percent or less.

14 **Q. Is a small customer base generally sufficient reason to forego the use**  
15 **of “industry standards”?**

16 A. No. Water utilities commonly refer to industry standards and best practices  
17 when making decisions related to capital improvements. Staff does not  
18 recommend foregoing these standards simply because a utility serves a small

1 number of customers. For example, with regard to security fencing around the  
2 water tank, such fencing is ultimately necessary to protect the water from  
3 tampering, and thereby to protect the health and safety of those consuming the  
4 water. The customers of a small system are no less endangered by the threat  
5 of water tampering than those of larger systems.

6 **Q. How do you respond to Ms. Chin's assertion that the Company "has**  
7 **not taken into consideration [the] community's ability to pay for" the**  
8 **recent capital improvements?**

9 A. Seavey Loop is required to provide safe, adequate, and reliable water services  
10 to its customers, and must make capital improvements in line with that  
11 requirement. The Company is not obligated to consider a community's ability to  
12 pay for necessary capital improvements in carrying out its duties regarding the  
13 provision of service.

**ISSUE 3 – INCLUSION OF SPECIFIC EXPENSES IN RATES**

1  
2 **Q. How do you respond to Ms. Rose’s objection to the inclusion of**  
3 **income taxes in customer rates?**

4 A. It is appropriate to include income taxes in the rate calculation. As a major  
5 component of a utility’s cost of service, income taxes are a standard inclusion  
6 in the revenue requirement in any ratemaking proceeding before the  
7 Commission. Payment of taxes is a OPUC long-recognized cost of business  
8 and appropriate to include in rates for any privately-owned company. The  
9 Stipulating Parties agreed to include \$1,705 for Federal Income Tax and \$574  
10 for State Income Tax, as discussed in Stipulating Parties/100.<sup>4</sup> The Stipulating  
11 Parties recommend no adjustment to those amounts.

12 **Q. Please explain Ms. Chin’s argument that industry standards should not**  
13 **be utilized in this case, as you understand it.**

14 A. In her testimony, Ms. Chin specifies two areas in which she objects to the use  
15 of industry standards. First, Ms. Chin cites the Stipulating Parties’ Joint  
16 Testimony in Support of the Stipulation, in which we stated that the Company’s  
17 capital improvements, including the installation of fencing on the utility’s  
18 property, were “necessary and align with industry standards.”<sup>5</sup> Secondly, Ms.  
19 Chin states that Staff previously advised that usage metering is an “industry  
20 standard.” Ms. Chin seems to argue that these standards should not be applied  
21 in this case due to the small customer base of 37 customers.

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<sup>4</sup> Stipulating Parties/100, Yamada-Puttman/20.

<sup>5</sup> Stipulating Parties/100, Yamada-Puttman/28.

1 **Q. How do you respond to Ms. Chin’s assertion that industry standards**  
2 **should not be utilized in this case?**

3 A. The Stipulation’s provisions regarding security fencing and the future possibility  
4 of usage metering are not merely “industry standards,” but are required by  
5 Oregon Administrative Rules<sup>6</sup> and statewide conservation efforts.<sup>7</sup> As  
6 explained elsewhere in this testimony, the Stipulating Parties maintain that  
7 security fencing around the utility property is necessary.

8 With regard to metering, we understand that Ms. Chin is referring to Item 9  
9 in the Stipulation, which states, “[t]he Stipulating Parties agree that Seavey  
10 Loop will look into the feasibility of adding meters in the future and will file a  
11 status report in this docket no later than January 1, 2025. The status report will  
12 detail the efforts that Seavey Loop has made to determine the feasibility of  
13 adding meters, and include any cost estimates the company has received by  
14 that time.” As discussed below, the Stipulating Parties maintain that this  
15 provision is necessary.

16 **Q. Why is it necessary to consider installing usage meters at Seavey Loop?**

17 A. As mentioned in Stipulating Parties/100, statewide conservation efforts  
18 generally encourage the installation of usage meters.<sup>8</sup> For example, the  
19 Commission’s Key Performance Measure (KPM) No. 1 relates to the  
20 “percentage of rate regulated water companies with rate designs promoting  
21 efficient use of water resources.” Progress under KPM No. 1 is measured by

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<sup>6</sup> See OAR 860-061-0050(6)(a)(P).

<sup>7</sup> See e.g. OAR 860-061-0050(6)(a)(P) and OPUC Key Performance Measure No. 1.

<sup>8</sup> Stipulating Parties/100, Yamada-Puttman/30.

1 the number of water utilities with meters. As of 2023, only two of the  
2 Commission's rate-regulated water utilities are without meters.<sup>9</sup> The Stipulating  
3 Parties emphasize that the Stipulation does not require Seavey Loop to install  
4 meters in the future, but rather requires a report on the feasibility of installing  
5 meters. Such research is necessary to understand whether the installation of  
6 meters would be an appropriate course of action for Seavey Loop. The present  
7 case does not include any rate effect related to the installation of meters. If the  
8 Company installed meters in the future, another rate case would be necessary  
9 to capture those costs in rates.

10 **Q. Why is the installation of security fencing necessary?**

11 A. As explained in Stipulating Parties/100, this requirement originates from  
12 OAR 860-061-0050(6)(a)(P), which requires that a "fence or other method of  
13 vandal deterrence shall be provided around distribution reservoirs."<sup>10</sup> Although  
14 the rule allows for "other method of vandal deterrence," a fence is the most  
15 appropriate deterrence measure in many cases, as in this case. A fence  
16 physically blocks the utility's water storage facilities from public view and  
17 impedes access, thereby protecting the facilities from vandalism and  
18 tampering. Such security measures are important to protect the quality of the  
19 water, and in turn, to protect human health.

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<sup>9</sup> See Public Utility Commission Annual Performance Progress Report, Reporting Year 2023, KPM #1, <https://www.oregon.gov/puc/forms/Forms%20and%20Reports/APPR-PUC.pdf>.

<sup>10</sup> Stipulating Parties/100, Yamada-Puttman/30.

1 **Q. How do you respond to Ms. Chin's assertion that a gated chain link**  
2 **fence is unnecessary, and that a padlock on the well building would**  
3 **have been sufficient for security purposes?**

4 A. As shown in Stipulating Parties/201, Yamada-Puttman/2, the utility's property  
5 contains a concrete storage tank adjacent to the pump house containing the  
6 well. A padlock on the pump house would not do anything to increase security  
7 around the storage tank and would therefore not comply with OAR 860-061-  
8 0050(6)(a)(P). Due to the shape, size, and location of the storage tank, fencing  
9 is the most appropriate method of vandal deterrence. Notably, the fencing  
10 installed by the Company protects the storage tank from direct view and  
11 access from the public right-of-way on Blossom Street. The Stipulation reflects  
12 the inclusion of \$9,375 for the chain link fence and gate in rate base under  
13 Account 304 (Structures and Improvements). As such fencing is a necessary  
14 cost of operating the utility, the Stipulating Parties maintain that its inclusion in  
15 rate base is appropriate.

16 **Q. How do you respond to Ms. Chin's assertion that the installed fencing**  
17 **is ineffective as it does not encompass the entire property?**

18 A. The Company asserts that fencing encompasses the entire property. The  
19 Company understands that Ms. Chin's assertion relates to a line of existing  
20 arborvitae along the eastern property line—the density of that vegetation  
21 obscures an existing chain link fence that was constructed prior to the current  
22 owner's purchase of the system. Seavey Loop's property is triangular, and the  
23 new fencing on the two additional sides was constructed to abut the existing

1 fencing on the east side of the property. As shown in Stipulating Parties/201,  
2 Yamada-Puttman/1-2, the fencing installed by the Company protects the  
3 utility's assets from direct view and access from the public right-of-way on  
4 Blossom Street, which represents a substantial increase in the security of the  
5 assets.

6 **Q. How do you respond to Ms. Chin's argument that security fencing is**  
7 **unnecessary because the neighborhood does not have a history of**  
8 **vandalism?**

9 A. OAR 860-061-0050(6)(a)(P) contains no provision to wait for a security incident  
10 prior to improving water security. Furthermore, history provides no guarantee of  
11 future events—security fencing is a proactive deterrent to prevent potential  
12 tampering.

13 **Q. How do you respond to Ms. Chin's assertion that the landscaping**  
14 **installed by the Company has died, and that the annual landscaping**  
15 **expense should be \$300 rather than the \$983 agreed to by the**  
16 **Stipulating Parties?**

17 A. The Summer 2022 landscaping improvements were removed from rate base,  
18 as discussed in Stipulating Parties/100,<sup>11</sup> and those costs are therefore  
19 excluded from customer rates. Furthermore, while many of the plants planted  
20 in Summer 2022 have since died, they were under warranty and are expected  
21 to be replaced by the vendor at no additional cost in 2024.

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<sup>11</sup> Stipulating Parties/100, Yamada-Puttman/18 and 22.

1           The \$983 landscaping expense included in rates is not solely related to  
2 maintaining the landscaping installed by the Company, but also includes  
3 necessary, regular maintenance of grass and other vegetation surrounding the  
4 utility's facilities. Vegetation management is generally required to maintain  
5 worker access to the utility's facilities and would be necessary regardless of  
6 landscaping improvements. The documented landscaping expense totaled  
7 \$1,965 in the test year, as summarized in the following table.

<i>Invoice #</i>	<i>Date</i>	<i>Vendor/Service</i>	<i>Amount</i>	<i>Description</i>
#2501	11/29/22	AG Landscape	\$180	Landscaping - November
#2464	10/30/22	AG Landscape	\$180	Landscaping - October
#2378	9/29/22	AG Landscape	\$175	Landscaping - September
#2314	9/30/22	AG Landscape	\$180	Landscaping - August
#2256	7/29/22	AG Landscape	\$200	Landscaping - July
#2181	6/29/22	AG Landscape	\$150	Landscaping - June
#2086	5/27/22	AG Landscape	\$150	Landscaping - May
#2032	4/30/22	AG Landscape	\$150	Landscaping - April
#1962	3/30/22	AG Landscape	\$150	Landscaping - March
#1886	2/28/22	AG Landscape	\$150	Landscaping - February
#1824	1/31/22	AG Landscape	\$150	Landscaping - January
#1748	12/30/21	AG Landscape	\$150	Landscaping - December '21
<b><i>Subtotal</i></b>			<b><i>\$1,965</i></b>	

8           Since the new landscaping improvements were installed in August and  
9 September of 2022, the majority of the monthly landscaping expenses  
10 recorded in 2022 were prior to and unrelated to the installation of the new  
11 landscaping. Nevertheless, while the documented landscaping expense totaled  
12 \$1,965 in the test year, the Stipulation reflects a 50 percent reduction to \$983  
13 annually, or approximately \$82 per month. Again Ms. Chin provides no  
14 evidence to support her suggested annual expense of \$300.

15           The Stipulating Parties assert that the stipulated annual landscape  
16 maintenance expense of \$983 in Account 639 (Contract Services—Other) is



1 reasonable for ongoing vegetation management. The Stipulating Parties

2 recommend no change to this amount.

3 **Q. Does this conclude your testimony?**

4 A. Yes.

**PUBLIC UTILITY COMMISSION  
OF  
OREGON**

**EXHIBIT 201**

**Fencing Photos**

**January 11, 2024**

### Seavey Loop Utility Property After Fencing Installation, 2023



Photo Source: UW 196 Exhibit Intervenor Chin/101, Chin/1.

### Seavey Loop Utility Property Prior to Fencing Installation, 2011



**PUBLIC UTILITY COMMISSION  
OF  
OREGON**

**EXHIBIT 202**

**Plant Assets**

**January 11, 2024**

**Invested Plant**

Acct No.	Account/Asset Description	Date Acquired	Utility Plant Orig Cost	NARUC Asset Life	Annual Deprec	Final Month of Deprec	2023	Accum. Deprec.	Remaining Plant
<b>301</b>	<b>Organization</b>	<b>Various</b>	<b>\$ 6,502</b>	<b>-</b>	<b>\$ -</b>	<b>Various</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 6,502</b>
	System Acquisition Due Dilligence	Dec 2019	\$ -		\$ -		\$ -	\$ -	\$ -
	Site Mapping	Sep 2019	\$ 1,038		\$ -		\$ -	\$ -	\$ 1,038
	Asset Management GIS	Jan 2020	\$ 755				\$ -	\$ -	\$ 755
	Asset Management GIS	Feb 2020	\$ 758				\$ -	\$ -	\$ 758
	Emergency Plan	Feb 2020	\$ 468				\$ -	\$ -	\$ 468
	Asset Management GIS	Mar 2020	\$ 1,130				\$ -	\$ -	\$ 1,130
	Emergency Plan	Mar 2020	\$ 372				\$ -	\$ -	\$ 372
	Asset Management GIS	Apr 2020	\$ 776				\$ -	\$ -	\$ 776
	Master Planning	Apr 2020	\$ 413				\$ -	\$ -	\$ 413
	Asset Management GIS	May 2020	\$ 396				\$ -	\$ -	\$ 396
	Master Planning	Oct 2022	\$ 198		\$ -		\$ -	\$ -	\$ 198
	Master Planning	Nov 2022	\$ -		\$ -		\$ -	\$ -	\$ -
	Master Planning	Nov 2022	\$ 198		\$ -		\$ -	\$ -	\$ 198
<b>303</b>	<b>Land and Land Rights</b>	<b>Various</b>	<b>\$ 918</b>	<b>-</b>	<b>\$ -</b>	<b>Various</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 918</b>
	Land	May 2019	\$ -	-	\$ -		\$ -	\$ -	\$ -
	Water Rights	Mar 2020	\$ 273	-	\$ -		\$ -	\$ -	\$ 273
	Water Rights	Apr 2020	\$ 313				\$ -	\$ -	\$ 313
	Water Rights	Aug 2020	\$ 331	-	\$ -		\$ -	\$ -	\$ 331
<b>304</b>	<b>Structures and Improvements</b>	<b>Various</b>	<b>\$ 15,152</b>	<b>35</b>	<b>\$ 433</b>	<b>Various</b>	<b>\$ 433</b>	<b>\$ 560</b>	<b>\$ 14,592</b>
	Site Improvements	Jan 2022	\$ 150	35	\$ 4	Dec 2056	\$ 4	\$ 9	\$ 141
	Site Improvements	Jan 2022	\$ 150	35	\$ 4	Dec 2056	\$ 4	\$ 9	\$ 141
	Site Improvements	Feb 2022	\$ 150	35	\$ 4	Jan 2057	\$ 4	\$ 8	\$ 142
	Site Improvements	May 2022	\$ 450	35	\$ 13	Apr 2057	\$ 13	\$ 21	\$ 429
	Site Improvements	Jun 2022	\$ 125	35	\$ 4	May 2057	\$ 4	\$ 6	\$ 119
	Site Improvements	Jul 2022	\$ 425	35	\$ 12	Jun 2057	\$ 12	\$ 18	\$ 407
	Landscaping improvements	Aug 2022	\$ -	35	\$ -	Jul 2057	\$ -	\$ -	\$ -
	Landscaping Improvements	Sep 2022	\$ -	35	\$ -	Aug 2057	\$ -	\$ -	\$ -
	Site Supervision Mileage	Sep 2022	\$ 285	35	\$ 8	Aug 2057	\$ 8	\$ 11	\$ 275
	Treatment Plant & Tank Painted; Plant Reroofed	Oct 2022	3,593	35	\$ 103	Sep 2057	\$ 103	\$ 128	\$ 3,465
	Chainlink Fence & Gate	Oct 2022	9,375	35	\$ 268	Sep 2057	\$ 268	\$ 335	\$ 9,040
	Improvements - Project Management	Oct 2022	\$ 228	35	\$ 7	Sep 2057	\$ 7	\$ 8	\$ 219
	Pump House Hose Bib	Dec 2022	\$ 221	35	\$ 6	Nov 2057	\$ 6	\$ 7	\$ 214
<b>305</b>	<b>Collecting and Impounding Reservoirs</b>	<b>Various</b>	<b>\$ 58,185</b>	<b>50</b>	<b>\$ 1,164</b>	<b>Various</b>	<b>\$ 1,164</b>	<b>\$ 1,839</b>	<b>\$ 56,346</b>
	Insulate Temp Tank	Jan 2022	\$ 276	50	\$ 6	Dec 2071	\$ 6	\$ 11	\$ 265
	Storage Tank Relined	Jun 2022	\$ 56,050	50	\$ 1,121	May 2072	\$ 1,121	\$ 1,775	\$ 54,275
	Storage Tank Relined	Jun 2022	\$ 54	50	\$ 1	May 2072	\$ 1	\$ 2	\$ 52
	Storage Tank Relined	Jun 2022	\$ 198	50	\$ 4	May 2072	\$ 4	\$ 6	\$ 192
	Storage Tank Relined	Jun 2022	\$ 198	50	\$ 4	May 2072	\$ 4	\$ 6	\$ 192
	Storage Tank Relined	Jun 2022	\$ 221	50	\$ 4	May 2072	\$ 4	\$ 7	\$ 214
	Storage Tank Relined	Aug 2022	\$ 768	50	\$ 15	Jul 2072	\$ 15	\$ 22	\$ 747
	Storage Tank	Nov 2022	\$ 419	50	\$ 8	Oct 2072	\$ 8	\$ 10	\$ 409

Acct No.	Account/Asset Description	Date Acquired	Utility Plant Orig Cost	NARUC Asset Life	Annual Deprec	Final Month of Deprec	2023	Accum. Deprec.	Remaining Plant
<b>309</b>	<b>Supply Main</b>	<b>Various</b>	<b>\$ 17,839</b>	<b>50</b>	<b>\$ 357</b>	<b>Various</b>	<b>\$ 357</b>	<b>\$ 880</b>	<b>\$ 16,959</b>
	Emergency Repair - 34161 El Manor	May 2020	7,356	50	\$ 147	Apr 2070	\$ 147	\$ 539	\$ 6,817
	Emergency Repair - Leak Repair	Jan 2021	1,364	50	\$ 27	Dec 2070	\$ 27	\$ 82	\$ 1,282
	Emergency Repair - 34179 El Centro Ave	Jun 2021	\$ 249	50	\$ 5	May 2071	\$ 5	\$ 13	\$ 236
	Emergency Repair - Main at Treatment Plant	Aug 2022	5,717	50	\$ 114	Jul 2072	\$ 114	\$ 162	\$ 5,555
	Emergency Repair - 24179 El Centro Ave	Sep 2022	520	50	\$ 10	Aug 2072	\$ 10	\$ 14	\$ 506
	Emergency Repair - Main at Treatment Plant	Sep 2022	2,634	50	\$ 53	Aug 2072	\$ 53	\$ 70	\$ 2,564
<b>310</b>	<b>Power Generation Equipment</b>	<b>Various</b>	<b>\$ 198</b>	<b>30</b>	<b>\$ 7</b>	<b>Various</b>	<b>\$ 7</b>	<b>\$ 24</b>	<b>\$ 174</b>
	Emergency Power Evaluation	May 2020	\$ 198	30	\$ 7	Apr 2050	\$ 7	\$ 24	\$ 174
<b>311</b>	<b>Pumping Equipment</b>	<b>Various</b>	<b>\$ 14,837</b>	<b>20</b>	<b>\$ 742</b>	<b>Various</b>	<b>\$ 742</b>	<b>\$ 1,607</b>	<b>\$ 13,230</b>
	Centrifugal Pump - Backup	Aug 2021	\$ -	20	\$ -	Jul 2041	\$ -	\$ -	\$ -
	Booster Pump Station	Nov 2021	\$ 14,837	20	\$ 742	Oct 2041	\$ 742	\$ 1,607	\$ 13,230
<b>320</b>	<b>Water Treatment Equipment</b>	<b>Various</b>	<b>\$ 23,537</b>	<b>20</b>	<b>\$1,177</b>	<b>Various</b>	<b>\$1,177</b>	<b>\$ 2,986</b>	<b>\$ 20,551</b>
	Treatment Plant	Jan 2020	\$ 676	20	\$ 34	Dec 2039	\$ 34	\$ 135	\$ 541
	Treatment Plant	Feb 2020	\$ 686	20	\$ 34	Jan 2040	\$ 34	\$ 134	\$ 552
	Treatment Plant	Mar 2020	\$ 6,373	20	\$ 319	Feb 2040	\$ 319	\$ 1,221	\$ 5,152
	Treatment Plant	Apr 2020	\$ 612	20	\$ 31	Mar 2040	\$ 31	\$ 115	\$ 497
	Treatment Plant Improvement Design	May 2020	\$ 3,131	20	\$ 157	Apr 2040	\$ 157	\$ 574	\$ 2,557
	Treatment Plant	Jun 2021	\$ 653	20	\$ 33	May 2041	\$ 33	\$ 84	\$ 569
	Treatment Plant	Jun 2022	\$ 288	20	\$ 14	May 2042	\$ 14	\$ 23	\$ 265
	Treatment Plant - Chlorine Analyzer	Sep 2022	\$ 7,607	20	\$ 380	Aug 2042	\$ 380	\$ 507	\$ 7,100
	Treatment Plant	Nov 2022	\$ 419	20	\$ 21	Oct 2042	\$ 21	\$ 24	\$ 394
	Treatment Plant	Dec 2022	\$ 3,091	20	\$ 155	Nov 2042	\$ 155	\$ 167	\$ 2,924
<b>333</b>	<b>Services</b>	<b>Various</b>	<b>\$ 1,897</b>	<b>30</b>	<b>\$ 63</b>	<b>Various</b>	<b>\$ 63</b>	<b>\$ 240</b>	<b>\$ 1,657</b>
	Billing System Upgrade	Feb 2020	\$ 497	30	\$ 17	Jan 2050	\$ 17	\$ 65	\$ 432
	Billing System Upgrade	Mar 2020	\$ 772	30	\$ 26	Feb 2050	\$ 26	\$ 99	\$ 673
	Billing System Upgrade	Apr 2020	\$ 496	30	\$ 17	Mar 2050	\$ 17	\$ 62	\$ 434
	Billing System Upgrade	Sep 2020	\$ 132	30	\$ 4	Aug 2050	\$ 4	\$ 15	\$ 118
<b>347</b>	<b>Electronic/Computer Equipment</b>	<b>Various</b>	<b>\$ 9,289</b>	<b>5</b>	<b>\$1,858</b>	<b>Various</b>	<b>\$1,858</b>	<b>\$ 6,967</b>	<b>\$ 2,322</b>
	Control Panel	Apr 2020	\$ 9,289	5	\$1,858	Mar 2025	\$1,858	\$ 6,967	\$ 2,322
<b>TOTALS</b>		<b>Various</b>	<b>\$ 148,353</b>	<b>Various</b>	<b>\$5,800</b>	<b>Various</b>	<b>\$5,800</b>	<b>\$15,103</b>	<b>\$ 133,250</b>

Original Plant In Service Cost	148,353
Less: Excess Capacity	-
"Used & Useful" Plant	148,353
Less Accum Depreciation	15,103
<b>NET PLANT</b>	<b>133,250</b>

<b>Depreciation Expense</b>	<b>5,800</b>
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