CASE: UW 177 WITNESS: RUSSELL BEITZEL

PUBLIC UTILITY COMMISSION OF OREGON

STAFF EXHIBIT 100

Testimony in Support of the Stipulation

1	Q. Please state your name, occupation, and business address.
2	A. My name is Russ Beitzel. I am a Senior Utility Analyst employed in the
3	Telecommunications and Water Division of the Public Utility Commission of
4	Oregon (OPUC). My business address is 201 High Street SE. Suite 100,
5	Salem, Oregon 97301.
6	Q. Please describe your educational background and work experience.
7	A. My witness qualification statement is found in Exhibit Staff/101.
8	Q. What is the purpose of your testimony?
9	A. The purpose of Staff's testimony is to introduce and support the stipulation
10	agreed to by the parties in Docket No. UW 177, Clearwater Source, LLC's
11	request for a general rate revision.
12	Q. Who is testifying in this docket?
13	A. I am testifying as the Staff witness in Docket No. UW 177.
14	Q. Did you prepare any exhibits for this docket?
15	A. Yes. I prepared Exhibit Staff/101, consisting of one page, Exhibit Staff/102,
16	consisting of seven pages, and Exhibit Staff/103, consisting of one page.
17	Q. Who are the parties to Docket No. UW 177?
18	A. The parties are Clearwater Source, LLC (Clearwater or Company); and
19	Commission Staff (Staff).
20	Q. Did the parties reach a settlement in Docket No. UW 177?
21	A. Yes. The Stipulation entered into by Clearwater and Staff (the Stipulating
22	Parties) settles all issues in this docket.
23	Q. How is your testimony organized?

A. My testimony is organized as follows:

Issue 1, Summary Recommendation	3
Issue 2, Clearwater's Description and Regulatory History	4
Issue 3, Application for a Rate Increase	4
Issue 4, Revenue Requirement Issues	7
Issue 5, Resolved Rate Issues	
Exhibit 101, Witness Qualification	Beitzel/1
Exhibit 102, Revenue Requirement - Water	
Exhibit 102, Revenue Requirement – Waste	Beitzel/2
Exhibit 102, Revenue Requirement Adjustments – Water	. Beitzel/3
Exhibit 102, Revenue Requirement Adjustments – Waste	Beitzel/4
Exhibit 102, Cost of Capital – Water	Beitzel/5
Exhibit 102, Cost of Capital - Waste	Beitzel/5
Exhibit 102, Rate Design - Water	Beitzel/6
Exhibit 102, Rate Design - Waste	Beitzel/6
Exhibit 102, Plant Utility – Water	
Exhibit 102, Plant Utility – Waste	
Exhibit 102, Summary of Rates, Bills and Revenue	
Exhibit 103, Data Responses	

ISSUE 1, SUMMARY RECOMMENDATION

Q. Briefly summarize the Stipulating Parties' recommendation in this case.
A. The Stipulating Parties recommend that the Commission adopt the Stipulation agreed to by the Stipulating Parties in Docket No. UW 177. The Stipulating Parties agreed to a revenue requirement of \$24,184. The revenue requirement results in a 90 percent increase over the 2018 test period revenues. It reflects an opportunity to earn a 9.5 percent rate of return on a rate base of \$24,983, and reflects a negative acquisition adjustment that reduces the net book value of plant in rate base to \$1, which is the purchase price paid for the utility. The Parties also agreed to implementation of a Purchased Water Adjustment (PWA) as an "automatic adjustment clause" allowed under ORS 757.210(b) regarding the Company's purchase of water and wastewater services from the City of Salem (City).

Q. Please explain the necessity for the size of the rate increase the Stipulating Parties agreed to in this Stipulation.

A. The Stipulating Parties agreed upon these increases after an in-depth review of the Company's expenses and capital investment. Several key factors drove the general size of the agreed increase, including adjustments to better reflect the expenses required to operate the Company, the rate case cost, and providing the Company a return on its investment in light of increased expenses. The Company has not increased its rates in over ten years since the increase granted in Docket No. UW 130, which was effective in June of 2009. Since that time, charges from the City of Salem for water and waste water

1 services, the Company's largest single expense, have more than doubled. In 2 order to mitigate the effect on customers, the Stipulating Parties have agreed to 3 a negative acquisition adjustment, which reduces the net book value of plant in 4 rate base to \$1, which is the purchase price paid for the utility.¹ 5 **ISSUE 2, CLEARWATER'S** 6 DESCRIPTION AND REGULATORY HISTORY 7 Q. Please describe Clearwater. 8 A. Clearwater is located in Salem, Oregon and is a privately owned, for-profit, 9 water utility. Clearwater provides water and wastewater service to 10 approximately 22 customers living primarily in one developed mobile home 11 park. As discussed above, Clearwater purchases its water and wastewater 12 services from the City. 13 Q. Please describe Clearwater's regulatory history. 14 A. Clearwater is a rate-regulated water utility under the jurisdiction of the 15 Commission. Clearwater filed a petition with the Commission requesting 16 regulation on July 9, 2008. The Company filed its first general rate increase on 17 September 25, 2008, and rates were approved in resulting docket UW 130 on 18 May 4, 2009, by Commission Order No. 09-158. 19 20 21 increase.

ISSUE 3, APPLICATION FOR A RATE INCREASE

Q. Please describe Clearwater's current application for a general rate

¹ Order 18-195, Appendix A, page 3.

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A. Clearwater's current owner, Alain Cailler, filed an application for a general rate increase on June 18, 2019, using a January 1, 2018 through December 31, 2018 test year. Clearwater proposed an overall increase of 115 percent, or a \$14,632 increase over test period revenues of \$12,733, resulting in an annual revenue requirement of \$27,365. The information and proposals in the Company's application would have translated to a proposed a rate base of \$61,570 with a 5.64 percent rate of return.

Mr. Cailler purchased the utility for \$1.00, as the prior owner did not see a value for the utility aside from serving the associated mobile home community.² Mr. Cailler also purchased the mobile home community served by the utility. The net book value of the utility assets at the time of purchase was \$40,129. Mr. Cailler has since invested \$25,000.

Q. What reason did the Company give for seeking a rate increase?

A. The Company stated in its application: "The utility is seeking this change in rates because the company is presently running a chronic and lasting financial deficit due to rates set more than 11 years ago, cost of capital improvements, and to allow Clearwater to continue dependable service to his customers."³

Q. What are Clearwater's current rates?

A. The Company currently provides service to residential customers only.

² Order 18-195, Appendix A, page 3.

³ Clearwater Source, LLC Rate Case Application at 4.

	For water, Clearwater currently charges all customers a base rate of \$17.24
2	and a commodity rate of \$3.73 per each 100 cubic feet of water use. According
3	to the Company, the current average monthly bill is \$26.52.
-	For wastewater, Clearwater currently charges all customers a base rate of
;	\$14.13 and a commodity rate of \$3.05 per each 100 cubic feet of water use.
;	According to the Company, the current average monthly bill is \$21.71.
,	Q. What rates did Clearwater propose in its general rate filing?
3	A. For water, the Company proposed tariffs include a residential base rate of
)	\$37.05 and a commodity rate of \$8.02 per each 100 cubic feet of water use.
)	According to the Company, the proposed average monthly bill would be
	\$56.99.
2	For wastewater, the Company proposed tariffs include a residential base rate of
3	\$30.37 and a commodity rate of \$6.56 per each 100 cubic feet of water use.
ŀ	According to the Company, the proposed average monthly bill would be
;	\$46.67.
;	Q. What procedural actions in this docket have taken place since
,	Clearwater filed its application for a rate increase?
3	A. Since the filing of the application in June 2019, the following procedural actions
)	have taken place:
)	1. An open house and prehearing conference were held on July 29, 2019, in
	Salem, OR;
2	2. A settlement conference was held in Salem, OR on September 11, 2019.

1 **ISSUE 4, REVENUE REQUIREMENT ISSUES** 2 Q. Please summarize the Stipulating Parties' recommendation for the 3 revenue requirement associated with a rate increase in this case. 4 A. The Stipulating Parties have agreed that an overall revenue requirement of 5 \$24,184 is warranted. The overall revenue requirement results in a 90 percent, 6 or \$11,451, increase over the test period revenues. The revenue requirement 7 reflects an opportunity to earn a 9.5 percent rate of return on a rate base of 8 \$24,983, and reflects a negative acquisition adjustment that reduces the net 9 book value of the plant in rate base associated with Mr.Callier's purchase of the 10 utility to \$1, the purchase price paid for the utility. 11 Q. Please describe the issues Staff investigated. 12 A. Staff's investigation and analysis of Clearwater's general rate filing included a 13 comprehensive examination of the Company's revenues, expenses, proposed 14 adjustments, rate spread and rate design, rate base, capital improvements, and 15 cost of capital. 16 Q. Please describe Staff's adjustments to Clearwater's test period. 17 A. All of the agreed-upon adjustments are listed in Exhibit 102 and explained 18 below. 19 1. Purchased Water (A/C 610): Stipulating Parties agreed that using an 20 annualized amount of the most current rates for the City of Salem water bill 21 was most appropriate to determine the correct expense. During Settlement, 22 Staff annualized the February 2019 bill for a yearly expense total of \$8,901, 23 which resulted in an increase of \$501.

1	2.	Telephone/Communications (A/C 611): In its response to Staff's Data
2		Request 09, ⁴ concerning the details of the Telephone expense account, the
3		Company indicated that the use of the business phone was 85 percent
4		related to the utility. The Company provided an invoice with its application
5		which allowed Staff to calculate the annual expense. Staff added \$550
6		based on the information provided by the following formula - $55 \times 85\% \times 12$
7		months = \sim \$550.
8	3.	Office Supplies (A/C 619): In its response to Staff's Data Request $07,^5$
9		concerning the details of the Office Supplies expense account, the
10		Company indicated that its total Office Supplies expense is \$1,812. Staff's
11		net adjustment of <\$1,080> was a result of several items (Postage, Internet,
12		Computer backup and security) being adjusted to their appropriate expense
13		account. The remaining amount of \$720 is based on Clearwater's projection
14		for miscellaneous office supplies.
15	4.	Postage (A/C 619.1): In its response to Staff's Data Request 07,6
16		concerning the details of the Postage expense account, the Company
17		indicated its Postage expense is \$150. Staff's adjustment was based on first
18		class stamps costing \$.55 and the Company having 22 customers, resulting
19		in the following formula - $55 \times 22 \times 12 = -150$.
20	5.	Contract Services – Accounting (A/C 632): The Company provided, in its
21		application, an invoice for accounting services that represented its annual

⁴ See Exhibit Staff/103, Beitzel/1, Clearwater's response to Staff Data Request 09.
⁵ See Exhibit Staff/103, Beitzel/1, Clearwater's response to Staff Data Request 07.
⁶ See Exhibit Staff/103, Beitzel/1, Clearwater's response to Staff Data Request 07.

1		expense of \$425. The Company inadvertently excluded that expense from
2		its proposed expenses. Staff corrected that error and adjusted the expense
3		account by \$425.
4	6.	Contract Services – Testing (A/C 635): In its response to Staff's Data
5		Request 08,7 the Company indicated that its Testing expense is estimated
6		to be \$110 per year. Staff's adjustment of \$110 was based on the
7		Company's estimate.
8	7.	Computer/Electronics Expenses (A/C 648): In its response to Staff's Data
9		Request 07,8 concerning the details of the Computer account, the Company
10		provided amounts for its Computer expenses. Staff's adjustment of \$942
11		was based on the Company provided invoices for Internet Connection
12		(\$720), Computer Backup system (\$112) and Computer Security program
13		(\$110).
14	8.	Amortization of Rate Case (A/C 666): Stipulating Parties agreed to add
15		\$550 based on the Company's owner having to travel to Salem from
16		California multiple times during the rate case process. The amount reflects
17		\$2,750 amortized over five years.
18	9.	Depreciation Expense (A/C 403): As a general concept, an asset is
19		depreciated over its useful life - the period of time that the asset will be in
20		service. The Company has some discretion in estimating the useful life(s)
21		for calculating its depreciation expense. Stipulating Parties discussed the

⁷ See Exhibit Staff/103, Beitzel/1, Clearwater's response to Staff Data Request 08. ⁸ See Exhibit Staff/103, Beitzel/1, Clearwater's response to Staff Data Request 07.

1 use, materials, and potential for replacement or repair of Meters and Pipes 2 and agreed to set the asset lives of Meters to 10 years and Pipes to 30 3 4 5 6 7 8 9 10 11 12 13 14 15 16 base. 17 18 19 20 Stipulating Parties. 21 22

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years. In addition, to fully recognize the timing of the recent investment in the utility (2018 and 2019), Stipulating Parties agreed to use the full yearly depreciation for both assets instead of the depreciation amount in the test year. These agreements resulted in a yearly depreciation amount of \$1,347. 10. Utility Plant in Service (A/C 101): Stipulating Parties agree that Meters (\$7,700) and Pipes (\$17,300), which were put into service in 2018 and 2019 respectively, are used and useful as well as prudent. The Stipulating Parties agree that, for ratemaking purposes, a negative acquisition adjustment will value the assets originally purchased by the current owner at the purchase price of \$1.00, which effectively removes \$40,128 in net book value from rate base and the associated depreciation from depreciation expense. The subsequent investments, such as those described above, will be valued at their net book value and included in rate 11. Accumulated Depreciation of Plant (A/C 108): Staff added \$1,652 to match the appropriate depreciated value of the plant assets. Staff recalculated the accumulated depreciation to reflect adjusted asset life agreed to by the Q. Please explain why the Stipulating Parties agree that a negative acquisition adjustment is appropriate under the circumstances of this case.

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Α. Staff recognizes that the Commission's long-standing policy has been that following the sale of a utility, rate base has been calculated in the following general rate case based on net book value, and not the purchase price paid. OAR 860-036-2130 is the administrative rule that addresses acquisition adjustments. Pursuant to subsection (1) of that rule, "[w]hen seeking to acquire all or part of a water utility, the applicant may request that some or all of the difference between the net book value and the purchase price be included in the purchasing utility's rate base." Subsection (2) provides that the Commission will consider any such request based on "the benefit to the customers being acquired and the public interest on a case-by-case basis." A negative acquisition occurs when the purchase price is less than the net book value of the plant in service, which results in a reduction to rate base (and therefore, a reduction to utility rates). A positive acquisition adjustment occurs when the purchase price of the utility is greater than the net book value of plant, and the applicant seeks to include the delta above the purchase price in rate base as goodwill.

In this case, the current owner purchased the utility for \$1, and repeatedly stated that his objective was to mitigate the rate increase to customers, while still receiving revenues that would allow for the return of and on his invested capital as well as the operating costs of the utility. In recognition of this desire, the Stipulating Parties have agreed on a nonprecedential, one-time basis based on the specific circumstances in this

Staff/100 Beitzel/12

case, to recommend the Commission adopt a negative acquisition adjustment. This has the effect of reducing the Company's proposed rates from \$27,365 to \$24,184, a decrease of \$3,181. Staff considered several options for balancing the rate increase with ratemaking considerations, but none were sufficient to both ensure that legal and policy considerations for ratemaking were met. Without the negative acquisition adjustment, assuming a 9.5 percent Return on Equity, the Company would require \$29,952 in rates. That amount is above the requested \$27,365 and would result in a 135 percent increase over current rates. Given Mr. Collier's concerns that a rate increase of that magnitude would be excessive, Staff and the Company agreed to a negative acquisition adjustment that would reduce the rate increase to customers to 90 percent over current rates. Q. Please explain why a PWA was applied to this case. A. Clearwater is a water and wastewater company that purchases those services from the City and then resells them to its customers. A PWA resolves two rate related issues with its inclusion. First, it allows the utility the ability to adjust future rates solely based on its largest expense (Salem Water) whenever it increases. Second, it benefits customers and the Company by delaying the need for future rate cases. Instead, Clearwater can adjust tariffs when City

Schedule No. 4 of the Company's tariffs in Attachment B to the Stipulation. An

increases its wholesale rates. Details regarding the PWA are described in

example showing the calculation of the PWA is provided as Attachment C to the Stipulation.

ISSUE 5, RESOLVED RATE ISSUES

Q. Please provide a brief explanation of the rate spread and rate design agreed to by the stipulating parties.

A. There is only one class of customers for both water and wastewater service,
 Residential 5/8" or 3/4". The rate design remains at a 65/35 split between base and commodity rates respectively.

Q. What are the effects of the rates agreed to by the stipulating parties on the average customer bill?

A. For Water, the effects of the rates agreed to by the Stipulating Parties on the average customer's monthly bills will be an increase of the base rate from \$17.24 to \$26.18 and no increase of the commodity rate (per 100 cubic feet).
With this adjustment, the average monthly water bill would increase from \$26.52 (provided by the Company) to \$40.28, assuming that the water usage remains the same as the test year.

For Wastewater, the effects of the rates agreed to by the Stipulating Parties on the average customer's monthly bills will be an increase of the base rate from \$14.13 to \$33.36 and with an increase of the commodity rate (per 100 cubic feet) from \$3.05 to \$4.75. With this adjustment, the average monthly wastewater bill would increase from \$21.71 (provided by the Company) to \$51.33, assuming that the wastewater usage remains the same as the test year.

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Q. Did all parties agree to and support the rates resulting from the
stipulation?
A. Yes.
Q. Did the parties agree to and support an effective date for the new
rates?
A. Yes. The Stipulating Parties agree to rates being effective for service rendered

on and after January 1, 2020, if the Commission enters an order adopting this Stipulation before January 1, 2020.

Q. Are the resulting rates fair and reasonable?

A. Yes.

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- Q. Does this conclude your testimony?
- A. Yes.

CASE: UW 177 WITNESS: RUSSELL (RUSS) BEITZEL

PUBLIC UTILITY COMMISSION OF OREGON

STAFF EXHIBIT 101

Witness Qualification Statement

WITNESS QUALIFICATIONS STATEMENT

NAME:	Russell (Russ) Beitzel
EMPLOYER:	Public Utility Commission of Oregon
TITLE:	Senior Utility Analyst Telecommunications and Water Division
ADDRESS:	201 High Street SE. Suite 100 Salem, OR. 97301
EDUCATION:	Bachelor of Science in Accounting, Otterbein University

EXPERIENCE: I am currently a Senior Utility Analyst for the PUC, focused primarily on regulated water companies. I worked at Ashland, Inc for twenty years as a manufacturing and corporate accountant and business analyst for a business unit with approximately one billion dollars in global annual sales. My accountant duties included product cost analysis, general ledger account analysis, SOX compliance, and internal and external audit compliance. My analyst duties included budgeting, forecasting, financial statement analysis, acquisition tracking, and division financial support for a global business unit.

CASE: UW 177 WITNESS: RUSSELL (RUSS) BEITZEL

PUBLIC UTILITY COMMISSION OF OREGON

STAFF EXHIBIT 102

Exhibits in Support of Testimony

Clearv	vater Source, LLC					Staff/10
Docke	et No. UW 177					Beitzel/
				Company		
				Proposed		Staff Proposed
				Increase		Increase
Deve						
keven	nue Requirement			0.00%		90%
					Staff	
			Company	Company	Adjustments to	Staff Propose
	REVENUES	Test Year	Adjustments		Company Totals	Totals
460	Unmetered	rest rear	Hujustinents	\$ -	company rotais	\$ -
461.1	Residential	5,599		\$ 5,599	5,035	\$ 10,634
401.1	Total Revenue	\$ 5,599	\$ -	\$ 5,599	\$ 5,035	\$ 10,63
		÷ 0,000	_ +	+ 0,000	÷ 0,000	¥ 10,00
Acct .	OPERATING EXPENSES					
601	Salaries and Wages - Employees			\$-	\$-	\$-
603	Salaries and Wages - Officers		3,600	\$ 3,600	\$-	\$ 3,60
604	Employee Pension & Benefits			\$-	\$-	\$-
610	Purchased Water	2,520		\$ 2,520	\$ 150	\$ 2,67
611	Telephone/Communications			\$-	\$ 275	\$ 27
615	Purchased Power			\$ -	\$-	\$-
616	Fuel for Power Production			\$-	\$ -	\$-
617	Other Utilities			\$ -	\$ -	\$-
618	Chemical / Treatment Expense			\$ -	\$ -	\$ -
619	Office Supplies	900		\$ 900	\$ (540)	\$ 36
619.1				\$ -	\$ 75	\$ 7
620	O&M Materials/Supplies			\$ -	\$ -	\$ -
621	Repairs to Water Plant			\$ -	\$ -	\$ -
631	Contract Svcs - Engineering			\$ -	\$ -	\$ -
632	Contract Svcs - Accounting			\$ -	\$ 213	\$ 21
633				\$ -	\$ -	\$ <u>21</u> \$ -
634	Contract Svcs - Legal Contract Svcs - Management Fees			\$ - \$	\$ -	ş - \$ -
				\$ - \$	\$ 110	
635	Contract Svcs - Testing					1
636	Contract Svcs - Labor	1.000	(1.000)	\$ -	\$-	\$ -
637	Contract Svcs - Billing/Collection	1,800	(1,800)	\$ -	\$-	\$ -
638	Contract Svcs - Meter Reading			\$ -	\$ -	\$ -
639	Contract Svcs - Other			\$ -	\$ -	\$ -
641	Rental of Building/Real Property			\$ -	\$ -	\$ -
642	Rental of Equipment			\$ -	\$ -	\$ -
643	Small Tools			\$-	\$-	\$-
648	Computer/Electronic Expenses			\$-	\$ 471	\$ 47
650	Transportation			\$-	\$-	\$-
656	Vehicle Insurance			\$-	\$-	\$-
657	General Liability Insurance			\$-	\$-	\$-
658	Workers' Comp Insurance			\$-	\$-	\$-
659	Insurance - Other			\$-	\$-	\$-
666	Amortz. of Rate Case			\$-	\$ 275	\$ 27
667	Gross Revenue Fee (PUC)	23		\$ 23	\$ 10	\$ 3
	TOTAL OPERATING EXPENSE	\$ 5,243	\$ 1,800	\$ 7,043	\$ 1,039	\$ 8,08
	OTHER REVENUE DEDUCTIONS					
403	Depreciation Expense			\$-	\$ 1,087	\$ 1,08
406	Amort of Plant Acquisition Adjustment	-		\$ -	\$ -	\$ -
407	Amortization Expense			\$ -	\$ -	\$ -
	Property Tax			\$-	\$-	\$ -
	Payroll Tax			\$ -	\$ -	\$ -
408.13				\$ -	\$ -	\$ -
	Federal Income Tax			\$ -	\$ 315	\$ 31
	Oregon Income Tax			\$-	\$ 106	\$ 10
	Extraordinary Items Income Tax			\$ -	\$ -	\$ -
	TOTAL REVENUE DEDUCTIONS	\$ 5,243	\$ 1,800	\$	\$ 2,548	\$ 9,59
	Net Operating Income	\$ 356				\$ 1,04
	UTILITY RATE BASE					
101	Utility Plant in Service			\$-	\$ 10,993	\$ 10,99
105	Construction Work in Progress			\$-	\$-	\$-
108	- Accumulated Depreciation of Plant			\$-	\$ 726	\$ 72
271	- Contributions in Aid of Construction			\$ -	\$ -	\$ -
272	+ Accumulated Amortization of CIAC			\$ -	\$ -	\$ -
281	- Accumulated Deferred Income Tax			\$ -	\$ -	\$ -
	- Excess Capacity			\$ -	\$ -	\$ -
	= NET RATE BASE INVESTMENT	\$ -	\$ -	\$ -	\$ 10,266	\$ 10,26
	- NET NATE DAJE HIVEJI WENT		· ~ -	· ~ -	γ 10,200	
	Plus: (working capital)					
151	Plus: (working capital) Materials and Supplies Inventory			<u>ج</u>	Ś -	\$
151	Materials and Supplies Inventory			\$ - \$ -	\$- \$719	\$ - \$ 71
151		\$ -	\$ -	\$ - \$ - \$ -	\$- \$719 \$10,985	\$ 71

Clearv	vater Source, LLC									Staff/102
Docke	et No. UW 177									Beitzel/2
						Company				1
						Proposed			Sta	ff Proposed
						Increase				Increase
Povor	nue Requirement					0.00%				90%
VEVEI						0.00%				90%
								Staff		
				Company		Company	Ad	justments to	Sta	ff Proposec
	REVENUES	Test Yea	r	Adjustments	Pro	posed Totals	Со	mpany Totals		Totals
460	Unmetered				\$	-			\$	
461.1	Residential	7,	134		\$	7,134		6,416	\$	13,550
	Total Revenue	\$7,	134	\$-	\$	7,134	\$	6,416	\$	13,550
Acct .	OPERATING EXPENSES				<u> </u>		<i>.</i>		<u> </u>	
601	Salaries and Wages - Employees			2.000	\$	-	\$	-	\$	-
603	Salaries and Wages - Officers			3,600	\$	3,600	\$	-	\$	3,600
604	Employee Pension & Benefits				\$		\$	-	\$	
610	Purchased Water	5,	880		\$	5,880	\$	351	\$	6,233
611	Telephone/Communications				\$	-	\$	275	\$	275
615	Purchased Power				\$	-	\$	-	\$	-
616	Fuel for Power Production				\$	-	\$	-	\$	-
617	Other Utilities				\$	-	\$	-	\$	-
618	Chemical / Treatment Expense				\$	-	\$	-	\$	-
619	Office Supplies		900		\$	900	\$	(540)	\$	360
619.1	Postage				\$	-	\$	75	\$	75
620	O&M Materials/Supplies				\$	-	\$	-	\$	-
621	Repairs to Water Plant				\$	-	\$	-	\$	-
631	Contract Svcs - Engineering				\$	-	\$	-	\$	-
632	Contract Svcs - Accounting				\$	-	\$	213	\$	213
633	Contract Svcs - Legal				\$	-	\$	-	\$	-
634	Contract Svcs - Management Fees				\$	-	\$	-	\$	-
635	Contract Svcs - Testing				\$	-	\$	-	\$	-
636	Contract Svcs - Labor				\$	-	\$	-	\$	-
637	Contract Svcs - Billing/Collection	1,	800	(1,800)	\$	-	\$	-	\$	-
638	Contract Svcs - Meter Reading				\$	-	\$	-	\$	-
639	Contract Svcs - Other				\$	-	\$	-	\$	-
641	Rental of Building/Real Property				\$	-	\$	-	\$	-
642	Rental of Equipment				\$	-	\$	-	\$	
643	Small Tools				\$	-	Ś	-	Ś	-
648	Computer/Electronic Expenses				\$	-	\$	471	\$	47:
650	Transportation				\$	-	\$	-	Ś	-
656	Vehicle Insurance				\$	-	Ś	-	Ś	-
657	General Liability Insurance				\$	-	\$	-	\$	-
658	Workers' Comp Insurance				\$	-	\$	-	\$	-
659	Insurance - Other				\$	-	\$	-	\$	-
666	Amortz. of Rate Case				\$		Ś	275	\$	275
667	Gross Revenue Fee (PUC)		28		Ś	28		12		4
007	TOTAL OPERATING EXPENSE	\$ 8,	608	\$ 1,800	\$	10,408	<u> </u>	1,132		11,53
		φ 0 ,		÷ 1,000	Ŷ	10,400	Ŷ	1,102	Ŷ	11,55
	OTHER REVENUE DEDUCTIONS									
403	Depreciation Expense				\$	-	\$	260	\$	260
406	Amort of Plant Acquisition Adjustment		-		\$	-	\$	-	\$	-
407	Amortization Expense				\$	-	\$	-	\$	
	Property Tax				\$	-	\$	-	\$	-
	Payroll Tax				\$	-	\$	-	ې \$	
408.12					\$	-	\$		ې \$	
	Federal Income Tax				\$	-	\$ \$	- 315	\$	315
	Oregon Income Tax				ې S	-	ې \$	106	ې \$	106
	Extraordinary Items Income Tax				ې \$	-	\$ \$	- 106	\$ \$	- 106
409.13	TOTAL REVENUE DEDUCTIONS	\$ 8,	608	\$ 1,800	\$	10,408	· ·	1,813	ې \$	12,220
	Net Operating Income		473)		-	(3,273)		4,603	\$	1,330
		, (1)	4/3/	÷ (1,000)	Ŷ	(3,273)	Ŷ	4,005	Ŷ	1,550
	UTILITY RATE BASE									
101	Utility Plant in Service				\$	-	\$	14,007	\$	14,00
105	Construction Work in Progress				\$	-	\$	-	\$	-
100	- Accumulated Depreciation of Plant				\$	-	\$	926	\$	926
105					\$	-	\$	-	\$	-
	- Contributions in Aid of Construction				\$	-	\$	-	\$	-
108 271	- Contributions in Aid of Construction + Accumulated Amortization of CIAC				٣.		Ŷ			
108 271 272	+ Accumulated Amortization of CIAC				Ś	-	Ś	-	S	
108 271	+ Accumulated Amortization of CIAC - Accumulated Deferred Income Tax				\$ \$	-	\$ \$	-	\$ \$	
108 271 272	+ Accumulated Amortization of CIAC - Accumulated Deferred Income Tax - Excess Capacity	\$	_	\$	\$		\$	-	\$	-
108 271 272	+ Accumulated Amortization of CIAC - Accumulated Deferred Income Tax - Excess Capacity = NET RATE BASE INVESTMENT	\$	-	\$-		-				-
108 271 272 281	+ Accumulated Amortization of CIAC - Accumulated Deferred Income Tax - Excess Capacity = NET RATE BASE INVESTMENT Plus: (working capital)	\$	-	\$ -	\$ \$	-	\$ \$	- 13,082	\$ \$	-
108 271 272	 + Accumulated Amortization of CIAC - Accumulated Deferred Income Tax - Excess Capacity = NET RATE BASE INVESTMENT Plus: (working capital) Materials and Supplies Inventory 	\$	-	\$ -	\$ \$ \$	-	\$ \$ \$	- 13,082 -	\$ \$ \$	- 13,08 -
108 271 272 281	+ Accumulated Amortization of CIAC - Accumulated Deferred Income Tax - Excess Capacity = NET RATE BASE INVESTMENT Plus: (working capital)	\$	-	\$ - \$ -	\$ \$	-	\$ \$	- 13,082	\$ \$	- 13,08

Docke	t No. UW 177							Beitzel/
Adjust	ment Summary							
					Staff			
	REVENUES		Company oposed Totals	Com	ustments to pany Totals		f Proposed Totals	Explanation of Adjustment
	Unmetered	\$	-	\$	-	\$	-	
	Residential	\$	5,599	\$	5,035	\$	10,634	Model adjustment to match parameters
	Commercial Fire Protection Sales	\$ \$	-	\$ \$	-	\$ \$		
	Irrigation Water Sales	ş		\$ \$	-	ş Ş		
	Water Sales for Resale	\$	-	\$	-	\$	-	
	Miscellaneous Services	\$	-	\$	-	\$	-	
	Cross Connection Control	\$	-	\$	-	\$	-	
	Other	\$	-	\$	-	\$	-	
	Total Revenue	0 \$ \$	- 5,599	\$ \$	- 5,035	\$ \$	- 10,634	
Acct .	OPERATING EXPENSES					-		
601	Salaries and Wages - Employees	\$	-	\$	-	\$		
603	Salaries and Wages - Officers	\$	3,600	\$	-	\$	3,600	No adjustment
604	Employee Pension & Benefits	\$	-	\$	-	\$	-	
610	Purchased Water	\$	2,520	\$	150	\$		Settlement annualized Feb 2019
611	Telephone/Communications	\$	-	\$	275	\$		Answer to Q9 85% business usage
615	Purchased Power	\$	-	\$ ¢	-	\$ ¢	-	
616 617	Fuel for Power Production Other Utilities	\$ \$	-	\$ \$	-	\$ \$	-	
618	Chemical / Treatment Expense	\$	-	\$ \$	-	\$	-	
619	Office Supplies	\$	900	\$	(540)	\$		Answer to Q7 - Misc 60/month in total
619.1	Postage	\$	-	\$	75	\$		Answer to Q7 - 22 cust, .55/stamp
620	O&M Materials/Supplies	\$	-	\$	-	\$	-	
621	Repairs to Water Plant	\$	-	\$	-	\$	-	
631 632	Contract Svcs - Engineering	\$ \$	-	\$ \$	- 213	\$ \$	-	Answer to 010 in Suppl appl info invoice provide
633	Contract Svcs - Accounting Contract Svcs - Legal	\$ \$		\$ \$	- 215	\$ \$	- 215	Answer to Q19 in Suppl appl info - invoice provide
634	Contract Svcs - Management Fees	\$	-	\$	-	\$	-	
635	Contract Svcs - Testing	\$	-	\$	110	\$	110	Answer to Q8 - Owner provided estimate
636	Contract Svcs - Labor	\$	-	\$	-	\$	-	
637	Contract Svcs - Billing/Collection	\$	-	\$	-	\$	-	
638	Contract Svcs - Meter Reading	\$	-	\$	-	\$	-	
639	Contract Svcs - Other	\$	-	\$	-	\$	-	
641 642	Rental of Building/Real Property Rental of Equipment	\$ \$		\$ \$	-	\$ \$		
643	Small Tools	\$		\$	-	\$	-	
648	Computer/Electronic Expenses	\$	-	\$	471	\$	471	Answer to Q7 - security prot, back up serv, interne
650	Transportation	\$	-	\$	-	\$	-	
656	Vehicle Insurance	\$	-	\$	-	\$	-	
657	General Liability Insurance	\$	-	\$	-	\$	-	
658 659	Workers' Comp Insurance Insurance - Other	\$ \$	-	\$ \$	-	\$ \$	-	
666	Amortz. of Rate Case	\$		ş Ş	275	\$		Settlement 2,750/5 years
667	Gross Revenue Fee (PUC)	Ş	23	\$	10	\$		Automatically calculated .3% of gross income
670	Bad Debt Expense	\$	-	\$	-	\$	-	, , ,
671	Cross Connection Control Program	\$	-	\$	-	\$	-	
673	Training and Certification	\$	-	\$	-	\$	-	
674	Consumer Confidence Report	\$	-	\$	-	\$	-	
675 OE1	Miscellaneous Expense Other Expense 1	\$ \$	-	\$ \$	-	\$ \$	-	
OE1 OE2	Other Expense 2	\$ \$	-	\$ \$	-	\$ \$	-	
OE3	Other Expense 3	\$	-	\$	-	\$	-	
OE4	Other Expense 4	\$	-	\$	-	\$	-	
OE5	Other Expense 5	\$	-	\$	-	\$	-	
	TOTAL OPERATING EXPENSE	\$	7,043	\$	1,039	\$	8,081	
403	OTHER REVENUE DEDUCTIONS	\$	-	\$	1 007	\$	1,087	Full yearly depreciation expense
403	Depreciation Expense Amort of Plant Acquisition Adjustment	\$ \$		\$ \$	1,087	\$ \$	1,067	Full yearly depreciation expense
407	Amortization Expense	\$	-	\$	-	\$	-	
408.11	Property Tax	\$	-	\$	-	\$	-	
	Payroll Tax	\$	-	\$	-	\$	-	
408.13		\$	-	\$	-	\$	-	
	Federal Income Tax Oregon Income Tax	\$ \$	-	\$ \$	315 106	\$ \$	315	Automatically calculated 21% Automatically calculated 6.6%
	Extraordinary Items Income Tax	\$		ş Ş	- 100	ې د	- 100	Automatically calculated 0.0%
105.15	TOTAL REVENUE DEDUCTIONS Net Operating Income	\$ \$	7,043 (1,444)	\$	2,548 2,487	\$ \$	9,590 1,044	
		Ý	(±,+++)	, <u>*</u>	2,407	, ř	1,044	
	UTILITY RATE BASE	-		6		ć		
101	Utility Plant in Service	\$ ¢	-	\$ ¢	10,993	\$ ¢	10,993	Investment from 2018 & 2019
105 108	Construction Work in Progress - Accumulated Depreciation of Plant	\$ \$	-	\$ \$	- 726	\$ \$	-	Accum Depr from above investment
271	- Accumulated Depreciation of Plant - Contributions in Aid of Construction	\$ \$		\$ \$	- 726	\$ \$	- 726	Accum Deprinom above investment
271	+ Accumulated Amortization of CIAC	\$ \$	-	\$ \$	-	\$ \$	-	
281	- Accumulated Deferred Income Tax	\$	-	\$	-	\$	-	
	- Excess Capacity	\$	-	\$	-	\$	-	
	= NET RATE BASE INVESTMENT	\$	-	\$	10,266	\$	10,266	
	Plus: (working capital)	-		<u> </u>				
151	Materials and Supplies Inventory	\$ ¢	-	\$ ¢	-	\$ ¢	-	Automatically calculated 1/12th of a second
	Working Cash (Total Op Exp /12) TOTAL RATE BASE	\$ \$		\$ \$	719 10,985	\$ ¢	719 10,985	Automatically calculated 1/12th of oper expense
	Rate of Return	, ,	0.00%	, ,	22.64%	Ý	9.50%	

								Beitzel/
\djust	ment Summary							
		_			Staff			
	REVENUES		Company roposed Totals	Com	istments to pany Totals		ff Proposed Totals	Explanation of Adjustment
	Unmetered	\$	-	\$	-	\$	-	
	Residential	\$ \$	7,134	\$ \$	6,416	\$ \$	- 13,550	Model adjustment to match parameters
	Commercial Fire Protection Sales	\$ \$	-	ې \$	-	ې \$	-	
	Irrigation Water Sales	Ś		\$	-	\$		
	Water Sales for Resale	\$	-	\$	-	\$		
	Miscellaneous Services	\$	-	\$	-	\$	-	
	Cross Connection Control	\$	-	\$	-	\$	-	
	Other	\$	-	\$	-	\$	-	
		0\$	-	\$	-	\$	-	
	Total Revenue	\$	7,134	\$	6,416	\$	13,550	
Acct .	OPERATING EXPENSES	-						
601	Salaries and Wages - Employees	\$	-	\$	-	\$	-	
603	Salaries and Wages - Officers	\$	3,600	\$	-	\$	3,600	No adjustment
604	Employee Pension & Benefits	\$	-	\$	-	\$	-	
610	Purchased Water	\$	5,880	\$ ¢	351	\$ ¢	,	Settlement annualized Feb 2019
611 615	Telephone/Communications Purchased Power	\$ \$	-	\$ \$	275	\$ \$	- 275	Answer to Q9 85% business usage
	Fuel for Power Production	\$	-	\$ \$	-	ې \$	-	
617	Other Utilities	\$	-	\$	-	\$	-	
618	Chemical / Treatment Expense	\$	-	\$	-	\$	-	
619	Office Supplies	\$	900	\$	(540)	\$	360	Answer to Q7 - Misc 60/month in total
	Postage	\$	-	\$	75	\$		Answer to Q7 - 22 cust, .55/stamp
620 621	O&M Materials/Supplies Repairs to Water Plant	\$ \$	-	\$ \$	-	\$ \$	-	
	Contract Svcs - Engineering	\$ \$		ې \$	-	ې \$		
	Contract Svcs - Accounting	\$	-	\$	213	\$		Answer to Q19 in Suppl appl info - invoice provide
633	Contract Svcs - Legal	\$	-	\$	-	\$	-	
634	Contract Svcs - Management Fees	\$	-	\$	-	\$	-	
635	Contract Svcs - Testing	\$	-	\$	-	\$	-	Answer to Q8 - Owner provided estimate
636	Contract Svcs - Labor	\$ \$	-	\$ \$	-	\$ \$	-	
637 638	Contract Svcs - Billing/Collection Contract Svcs - Meter Reading	\$ \$	-	\$ \$	-	\$ \$	-	
	Contract Svcs - Other	\$	-	\$	-	\$		
641	Rental of Building/Real Property	\$	-	\$	-	\$	-	
642	Rental of Equipment	\$	-	\$	-	\$		
	Small Tools	\$	-	\$	-	\$	-	
648	Computer/Electronic Expenses	\$	-	\$	471	\$		Answer to Q7 - security prot, back up serv, interne
650 656	Transportation Vehicle Insurance	\$ \$	-	\$ \$	-	\$ \$	-	
657	General Liability Insurance	Ś	-	Ś	-	Ś		
658	Workers' Comp Insurance	\$	-	\$	-	\$	-	
659	Insurance - Other	\$	-	\$	-	\$	-	
	Amortz. of Rate Case	\$	-	\$	275	\$		Settlement 2,750/5 years
	Gross Revenue Fee (PUC)	\$ \$	- 28	\$ \$	- 12	\$ \$	- 40	Automatically calculated .3% of gross income
	Bad Debt Expense Cross Connection Control Program	\$		\$ \$	-	ې \$		
	Training and Certification	\$	-	\$	-	\$		
	Consumer Confidence Report	\$	-	\$	-	\$	-	
675	Miscellaneous Expense	\$	-	\$	-	\$		
	Other Expense 1	\$	-	\$	-	\$	-	
	Other Expense 2	\$	-	\$	-	\$	-	
	Other Expense 3 Other Expense 4	\$ \$	-	\$ \$	-	\$ \$	-	
	Other Expense 5	\$		Ś	-	\$	-	
	TOTAL OPERATING EXPENSE	\$	10,408	\$	1,132	\$	11,539	
402	OTHER REVENUE DEDUCTIONS	<i>^</i>	-	ć	200	ć	200	Full yearly depresiation syname
	Depreciation Expense Amort of Plant Acquisition Adjustment	\$ \$	-	\$ \$	260	\$ \$	260	Full yearly depreciation expense
	Amortization Expense	\$	-	\$ \$	-	ې \$	-	
	Property Tax	\$	-	\$	-	\$	-	
408.12	Payroll Tax	\$	-	\$	-	\$	-	
408.13		\$	-	\$	-	\$	-	
	Federal Income Tax	\$	-	\$	315	\$	315	Automatically calculated 21%
	Oregon Income Tax Extraordinary Items Income Tax	\$ \$	-	\$ \$	- 106	\$ \$	- 106	Automatically calculated 6.6%
+05.15	TOTAL REVENUE DEDUCTIONS	\$	10,408	\$	1,813	\$	12,220	
	Net Operating Income	\$	(3,273)		4,603	\$	1,330	
10:	UTILITY RATE BASE	-		6		6		
101 105	Utility Plant in Service	\$ \$	-	\$ \$	14,007	\$ \$	14,007	Investment from 2018 & 2019
105	Construction Work in Progress - Accumulated Depreciation of Plant	\$ \$		\$ \$	- 926	\$ \$	- 926	Accum Depr from above investment
	- Contributions in Aid of Construction	\$	-	\$	-	\$	-	accan bepritten above investment
	+ Accumulated Amortization of CIAC	\$	-	\$	-	\$	-	
281	- Accumulated Deferred Income Tax	\$	-	\$	-	\$	-	
	- Excess Capacity	\$	-	\$	-	\$	-	
	= NET RATE BASE INVESTMENT	\$	-	\$	13,082	\$	13,082	
	Plus: (working capital)							
151		ć		¢		c		
151	Materials and Supplies Inventory Working Cash (Total Op Exp /12)	\$ \$	-	\$ \$	- 916	\$ \$	- 916	Automatically calculated 1/12th of oper expense

Clearwater Source, LLC					Staff/102
Docket No. UW 177					Beitzel/5
Cost of Capital - Water					
		Сар			
	Amount	Struct	Cost	Wtd. Cost	
		0.00%		0.00%	
		0.00%		0.00%	
		0.00%		0.00%	
Total Debt	-	0.00%		0.00%	
Original Investment	0	0.00%	9.50%	0.00%	
Working Cash	719	6.14%	9.50%	0.58%	
Recent Investment	10,993	93.86%	9.50%	8.92%	
Total Equity	11,712	100.00%		9.50%	ROE
Total Debt + Equity	11,712	100.00%		9.50%	ROR

Clearwater Source, LLC					Staff/102
Docket No. UW 177					Beitzel/5
Cost of Capital - Waste					
		Сар			
	Amount	Struct	Cost	Wtd. Cost	
		0.00%		0.00%	
		0.00%		0.00%	
		0.00%		0.00%	
Total Debt	-	0.00%		0.00%	
Original Investment	1	0.00%	9.50%	0.00%	
Working Cash	916	6.14%	9.50%	0.58%	
Recent Investment	14,007	93.86%	9.50%	8.92%	
Total Equity	14,924	100.00%		9.50%	ROE
Total Debt + Equity	14,924	100.00%		9.50%	ROR

Clearwater Source, LLC						Staff/102
Docket No. UW 177						Beitzel/6
Rate Design						
Water				Rever	ue Allocation:	10,634
				Allocated t	to Base Rates:	65.00%
			Al	located to Com	modity Rates:	35.00%
Base Rates				Rever	ue Allocation:	6,912
			Customer		Revenue	
Meter Size	Customers	Factors	Equivalency 22	% of Total	Allocation	Base Rate \$ 26.18
5/8" TOTAL	22 22	1.0	22	100.00% 100.00%		\$ 26.18
Commodity Rate				Rever	ue Allocation:	3,722
Annual Consumption	33,914	Gallons				
Unit of Measurement	100	CF				
Annual Units of Consumption	45	Units				
Commodity Rate:	\$ 3.73	per unit				

Clearwater Source, LLC						Staff/102
Docket No. UW 177						Beitzel/6
Rate Design						
Waste				Rever	ue Allocation:	13,550
				Allocated t	o Base Rates:	65.00%
			Al	located to Com	modity Rates:	35.00%
Base Rates				Rever	ue Allocation:	8,808
			Customer		Revenue	
Meter Size	Customers	Factors	Equivalency	% of Total	Allocation	Base Rate
5/8"	22	1.0		100.00%		\$ 33.36
TOTAL	22		22	100.00%	\$ 8,808	
Commodity Rate				Rever	ue Allocation:	4,743
Annual Consumption	33,914	Gallons				
Unit of Measurement	100	CF				
Annual Units of Consumption	45	Units				
Commodity Rate:	\$ 4.75	per unit				

Clearwate	er Source, LLC											Staff/102
Docket No	o. UW 177											Beitzel/7
WATER												
	Invested Plant											
Acct No.	Asset Description	Date Acquired	Utility Plant Orig Cost	Total Adj Plant	Asset Life	Annual Deprec	Final Month of Deprec	2018	2019	2020	Accum. Deprec.	Remaining Plant
331	Pipes	4/2019	7,607	7,607	30	254	Apr 2049	-	191	254	191	7,416
334	22 meters	6/2018	3,386	3,386	10	339	Jun 2028	198	339	339	537	2,849
	TOTALS	Various	10,993	10,993		593		198	530	593	727	10,265

Clearwat	er Source, LLC											Staff/102
Docket N	lo. UW 177											Beitzel/7
WASTE												
	Invested Plant											
			Utility				Final					
		Date	Plant Orig	Total Adj	Asset	Annual	Month of				Accum.	Remaining
Acct No.	Asset Description	Acquired	Cost	Plant	Life	Deprec	Deprec	2018	2019	2020	Deprec.	Plant
331	Pipes	4/2019	9,693	9,693	30	323	Apr 2049	-	242	323	242	9,451
334	22 meters	6/2018	4,314	4,314	10	431	Jun 2028	251	431	431	682	3,632
	TOTALS	Various	14,007	14,007		754		251	673	754	925	13,083

Clearwater Source, LL	C													Staff/102
Docket No. UW 177														Beitzel/
Summary of Rates, Bills and	d Revenues													
				BASE RATES		co	MMODITY R	ATES		VERAGE BIL	s		REVENUE	
	Total	Total		Staff			Staff			Staff				
	Projected	Projected	Current	Proposed	Difference	Current	Proposed	Difference	Current	Proposed	Difference		Commodity	r
Line Type & Size	Customers	Consumption	Rate	Rate	%	Rate	Rate	(%)	Rate	Rate	(%)	Base Rate	Rate	Total
Water - METERED														
Residential/Commercial														
5/8" or 3/4"	22	45	\$17.24	\$26.18	51.87%	\$3.73	\$3.73	0.04%	\$26.52	\$40.28	51.91%	\$6,912.10	\$3,721.90	\$10,634.00
Waste Water - METERED														
Residential/Commercial														
5/8" or 3/4"	22	45	\$14.13	\$33.36	136.11%	\$3.05	\$4.75	<u>55.89%</u>	\$21.71	\$51.33	136.37%	\$8,807.59	\$4,742.55	\$13,550.14
TOTAL Revenue		1										\$15 719 70	\$8,464.45	\$24,184.15

CASE: UW 177 WITNESS: RUSSELL (RUSS) BEITZEL

PUBLIC UTILITY COMMISSION OF OREGON

STAFF EXHIBIT 103

Exhibits in Support of Testimony

OPUC Data Request 07

Please provide a detailed projected expense per month for Office Supplies (A/C 619) for future years.

Response to OPUC Data Request 07

7. Projected office expenses (being noted that utility testing is addressed in the next question):

- a. Internet connection and fax landline \$720
- b. Postage, mailing \$150
- c. Computer backup system (as paragraph above) \$111.99
- d. Security program (as paragraph above) \$109.99
- e. Strictly office items \$720

Total: \$1,812

OPUC Data Request 08

Please provide a list of all required Utility testing (A/C 635) for the next three years and the approximate cost of each.

Response to OPUC Data Request 08

8. Utility testing: Was for 2018: \$103 Estimated to be about \$110 for the next 3 years

OPUC Data Request 09

For the telephone expense listed in the application Q28 and the Verizon invoice provided in the Supplemental Information attachment to the application, please provide the percentage of time this telephone is used for Utility service purposes.

Response to OPUC Data Request 09

9.Telephone use:

In addition to a landline, I own a different phone for all personal calls and the business phone is used at 85% for the business aspect. Therefore, I can reasonably estimate the proration being for business use in dollar being $55 \times 0.85 = 46$ a month, or 550 a year.