

FLORIDA PUBLIC SERVICE COMMISSION DOCUMENT MUMBER-DATE 05067 HaY -6\%



## PROCEEDINGS

(Transcript continues from Volume 18.)
COMMISSIONER DEASON: If the City of Venice was not one of the data points, that line would shift from the carryover, would it not?

WITNESS WHITCOMB: Yes.
COMMISSIONER DEASON: It would flatten a great deal, would it not?

WITNESS WHITCOMB: Yes.
I would like to just comment that you shouldn't read too much into that information because all these other factors have not been controlled for in the analysis.

COMMISSIONER DEASON: Yesterday when you were talking about the income effect of the rate structure and the effect of a change in base facility charge keeping the gallonage charge constant, that would result -- everything else being equal -- that would result in a marginal income effect. And that would, in your opinion, result in higher usage, perhaps very marginally, so but nevertheless higher usage.

WITNESS WHITCOMB: Correct.
COMMISSIONER DEASON: I believe you gave the example of a base facility charge of $\$ 5$ with say
a gallonage charge of a dollar, and then a base facility charge of $\$ 10$ with a gallonage charge of a dollar. That under those two rate structures you would think that the higher usage would be with the base facility charge of $\$ 5$.

WITNESS WHITCOMB: In a very theoretical -COMMISSIONER DEASON: It would be $\$ 5$ more of disposable income.

WITNESS WHITCOMB: In a theoretical way, yes.

COMMISSIONER DEASON: In a theoretical
way. In a common sense way, let me ask you a question about that. Do you think it is possible that a customer, a customer under one rate structure -- that is the five-dollar base facility charge and another customer with a ten-dollar base facility charge, that it may be conceivable that the customer with the ten-dollar base facility charge may consume more gallonage if the customer is only concerned about the bottom line of the bill, and they know that their bill only increases marginally; so bottom line, when there is a higher base facility charge.

For example, the customer with the
five-dollar base facility charge would show a lower, I'm sorry, a higher percentage increase in bottom
line bill for every additional gallon consumed, perhaps to some type of a breaking point. I don't know where that would be. Have you ever observed that phenomenon at anytime in your studies?

WITNESS WHITCOMB: No. The economic theory is based, the economic theory supports the marginal price, is the price signal that a rational customer with perfect information would respond to. I think there is some defection from that standpoint in that I believe that certain people think it should be an average of some of these prices on the block rate structure, which is sending the signal to these customers. But in all these studies, they are concentrating on the gallonage charge, because that is, that is affecting, that decision affects their bill.

You bring out it can change the percentage of the total bill. So this is even a different perception issue, and even an alternative price specification that you could then run and test and see the results of that. You would say some function of the total bill.

And in all the studies that are out there, 120 empirical studies, that particular price signal specification hasn't been used.

COMMISSIONER DEASON: Are you aware of any economists that describe to the theory that customers are concerned with bottom line bills?

WITNESS WHITCOMB: No.
COMMISSIONER DEASON: I would invite you to attend some of our demand side management hearings. That's just an aside. That's all the questions.

CHAIRMAN CLARK: Redirect.
MR. HOFFMAN: Thank You, Madam Chairman.
JOHN B. WHITCOMB
resumed the stand on behalf of Southern States Utilities, and having previously been duly sworn, testified as follows:

## REDIRECT EXAMINATION

BY MR. HOFFMAN :
Q Dr. Whitcomb, I think that we can at minimum glean from the extensive cross examination regard concerning your two studies, that the study that you rely on in support of your proposed elasticity adjustment in this proceeding was the first study, the WATERATE 2.1 , which is attached as JBW-3 to your testimony; is that correct?

A That's correct.
Q Let me ask you this, first. If you were to have used the second study in support of a price
elasticity adjustment in this case, that is the WATERATE 2.2, what would the impact be on the proposed elasticity adjustment that you are recommending?

A The second study, which I call the updated study, has price elasticities that are slightly higher than the original studies at the price ranges that we are looking at. To that extent, the price elasticity adjustment would be higher if using the updated model than the original model.

Q Okay. And therefore, under the second model the impact on projected consumption and, therefore, projected revenue would have been greater.

A Projected consumption would be lower under the updated model; and thus, the rates would be slightly higher.

Q Okay. You helped me with that. I didn't state that correctly. Okay. There would have been, the impact on projected consumption as a result of your second study would be what as compared to your first study?

A The impact on projected consumption would be less.

Q Now, in response to some questions from Mr. McLean, there was some discussion concerning one peer
reviewer's comments. Do you recall that?
A Yes.
Q Now, that peer reviewer's comments were directed to your second study, not your first study; is that correct?

A Correct.
Q Now, we learned from those questions that your second study was not accepted for publication because of what was characterized by one reviewer as a fatal flaw; do you recall that?

A Yes.
Q Let me first ask you this. In light of that criticism why then has SMFWMD moved forward with the implementation of your second study through the WATERATE software program?

A Well, as I described at length yesterday, the inference that the demand curve should be assumed to be relevant outside the range of experience is a standard that is set which would eliminate almost 90 percent of almost all research done in a situation.

We believe that within this range of $\$ 0.40$ to $\$ 7.05$, that we have come up with the best demand curve possible to fit the situation. We've also looked at coming up with the most credible and accurate information. It is very important to SWFWMD
that they have the most credible study. They have amassed the largest database on the subject.

It is important that the analysis is also done at that level. If we assumed -- we could have got the paper published as laid out in cross examination Exhibit No. 136, Page 2, as that letter describes. We could have got that paper published if we had gone ahead and used the conventional demand function. There wouldn't be any controversy about it. But we wouldn't do that. I wouldn't do it. My colleagues wouldn't do it and SWFWMD didn't want to do that because that would assume, that would assume the price elasticity is constant over the whole price spectrum. All evidence suggests that is not the case.

Now, the Commissioners here have to render some judgment -- and the staff -- have to render some judgment on credibility of this new innovative technique that we've come up with. I point out that if you want to go and use the conventional technique, we've already calculated the data, we've presented it to OPC and can be used in this rate case. The net effect would be that the price elasticity adjustment would be greater.

Now, you can use that, but myself and my

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team aren't going to stand behind that number because we know that the price elasticity is a function of price level. All the evidence supports that. That is our stance.

Q Dr. Whitcomb, you have published before, as I understand it?

A Yes. I have published a number of articles in water demand analysis.

Q All right. And those are outlined in your Exhibit JBW-1?

A Yes.
Q All right, sir. All you needed to do in order to get published again was to concede to this alleged fatal law; is that correct?

A Yes. If we, if we had gone the conventional way, it is my impression it would be, it would have been accepted for publication. We weren't going to sacrifice our integrity just to get another publication. It is too important to -- we have, we have done so much work to get this database together that we want to have also the best analytical tools employed in this case.

Q Well, you mentioned that you are not alone in your assessment that there is not a fatal flaw with respect to your second study.

A That's right. All my colleagues that I've shared this comment with, Jay Yingling of SWFWMD, who is going to be testifying here, also feels the same way. And it is our intent for these more than 50 registered users here in Florida to have the best information. That is why we sent out WATERATE 2.2.

Q Well, is the fact that the WATERATE 2.2 software is being used by I think you said 50 other utilities in Florida indicative of the fact that there is not a fatal flaw in that study?

MR. MCLEAN: Objection, leading.
MR. HOFFMAN: Do you want me to rephrase it, Madam Chairman?

CHAIRMAN CLARK: Yes.

BY MR. HOFFMAN :

Q Dr. Whitcomb, are you aware of any circumstances which would indicate to you, any other circumstances, which would indicate to you that there is not a fatal flaw in your second study?

A Well, the fatal flaw -- you mean, you have this mantra of fatal flaw. Again, it is not the model. It is not the model. It is the inference where the fatal flaw is. All the research we worked, we've done, is not applicable to prices above the $\$ 7.05$ per thousand gallons.

And in this case, we have a model that is being widely used, and we believe is credible.

Q Well, to your knowledge, how many other utilities in Florida are using the WATERATE 2.2 model?

A Somewhere around 75 now.
Q Thank you. Let me go back to one of my first line of questions concerning the impact of the second study, just for purposes of clarification. As I understand it, the impact of the second study, the WATERATE 2.2, would be that projected consumption would be less as compared to the first study; is that correct?

A Yes.
Q And therefore, that would result in a higher elasticity adjustment?

A Yes.
Q Thank you. Now, there were a number of questions concerning the applicability of your study to SSU's various service areas; do you recall those questions?

A Yes.

Q You have testified on a number of occasions now with respect to the climate issue, do you recall that?

A Yes.
Q You've testified on the similarity and variance of the net irrigation requirement when you compare the SWFWMD utilities to the SSU plants and facilities; do you recall that?

A Yes.
Q Let me ask you this. Is there any degree of similarity between the rate structures of the utilities that were looked at in the study and the rate structure of $\operatorname{SSU}^{\prime}$ s customers which lead you to conclude that the studies should be applied to SSU's customers?

A Yes. I would say, first of all, we have gone to extensive steps to account for differences that rate structure may have on this case. We, as in Commissioner Deason's line of questioning, we accounted for the income effect that can happen from these, from different rate structures.

One of Dr. Dismukes' claims is that we didn't account for this factor when we actually did.

The other point to be made is that about 50 percent of $S S U^{\prime} s$ customers have a non-block quantity charge and about 50 percent have an effective declining block rate when you look at both water and sewer components.

If you look at the SWFWMD study, about 39 percent of the customers in that study faced a non-block rate. That's when you include -- effective non-block rate -- when you include those that have minimum bills. If you look at those that had a declining block rate or some mixed declining block rate, that was 57 percent of the sample. Hence, there is very close similarity also in rate structure.

Q All right. Were you finished, Dr.

Whitcomb?

A Yes.
Q Commissioner Deason did ask you some questions about the income factor. Can you explain for us the degree of significance that a customer's income has in your study on a proposed elasticity adjustment?

A The primary factor effecting price elasticity is price level as reflected in our report. There is some difference in price elasticity related to income.

I believe you are mixing up the income and how income effects price elasticity and this other issue, which is the income effect, which has to do with a -- it is more of a theoretical point based on

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disposable income.
Q Okay. What has a greater impact on consumption, price or rate structure?

A Price.
Q Why is that?
A Price is the relevant information that a customer looks at when deciding to consume another unit or to cut back on water use by one unit. It is the reward they get for doing that. It is the direct impact.

Q In one of Mr. Twomey's questions you stated that a goal of the rate structure in terms of the 40 percent based facility charge and 60 percent gallonage charge that you are recommending in this case is to encourage conservation. Do you recall that?

A That is one of two goals.
Q Okay, you are getting to my next question, which was are there any other goals that are reflected by that proposal?

A Water conservation was one objective. Financial risk is the other objective. They are competing goals. You can't get more without sacrificing the other. You have to come to some level of compromise to come to the desired point.

Q Dr. Whitcomb, are you aware that interim rates were placed in effect in this rate proceeding in January of 1996?

A Yes.
Q In light of that fact, would you agree that 50 percent of the elasticity impact will be felt by SSU's customers by December 31 of 1996?

A I would say that you, the price elasticity impact is certainly in effect right now; that is, precisely 50 percent of whatever gets proposed here is not known.

Q You adjusted for 75 percent of the total expected elasticity in the MFRs; is that correct?

A Correct.
Q If that adjustment is reduced below that level, then all else being equal, what would be the expected impact on Southern States' revenues in 1997 and thereafter?

A Well, to the extent that you are underestimating the price elasticity adjustment, you are overstating projected revenues, which decreases the gallonage charge, which when water consumption becomes lower will actually be a decrease in SSU's revenue.

Q There would be an underrecovery of

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revenue?

A Correct.
Q I also want to be clear on the issue of the weather normalization charge. Does the weather normalization charge address only weather impacts or all variables that impact weather?

A As I said earlier, I believe it should probably be recalled the water normalization clause and not the weather normalization clause.

Q So it is impacted by all those variables?
A Yes.
Q Okay. Dr. Whitcomb, based on your knowledge and experience, have clauses like the gas adjustment clause, fuel adjustment clause that is employed by this Commission, a weather normalization clause, all of these at some point were new innovations in their respective industries; were they not?

A That's correct.
Q Well, take for example the fuel adjustment clause. Do you believe that implementation of the fuel adjustment clause would have required the extensive level of analysis that is being applied to your proposed weather normalization clause in this proceeding?

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A It seems like that would be a smaller issue than this one.

Q Let me follow up with another question on that, Dr. Whitcomb. In considering the weather normalization clause or the water normalization clause, what is it that requires scrutiny on your part? What is it that is more difficult about it, in your opinion?

Is it the actual implementation of the clause and calculating the appropriate overcollections or undercollections, or is it the principles that ought to be considered by the Commission in determining whether or not the application of the clause is appropriate?

A I believe it is going to take some work to set it up and get it going. Once it does get going the way that $\operatorname{SSU}$ has proposed, then it would become a minor administrative task just adjusting the consumption from -- actual consumption with projected consumption for each month and making the calculations from that.

Q In your opinion, is there anything that is complex concerning the issue of whether or not the Commission should accept for SSU the weather normalization clause?

A Well, if you went to the stand-alone rates it would be much more difficult to make the calculations for WNC. You would then have to make the calculations on a system-by-system basis.

Q That would be an application issue, isn't that correct?
A. Correct.

Q I'm talking about concepts. In your opinion, is there anything that is significantly more complex about the weather normalization clause when you compare it with, say, the fuel adjustment clause in terms of the goals that SSU is attempting to reach through the clause?

MR. TWOMEY: Pardon me, Madam Chairman. I
don't believe it has been established, unless I missed something, one, this is beyond the scope of the cross examination; and two, I don't think it has been established that Dr. Whitcomb understands how fuel adjustment clauses or the other clauses mentioned operate here in Florida in terms of their complexity.

MR. HOFFMAN: Madam Chairman, if I may, I would like to go back then and ask Dr. Whitcomb if he does have a familiarity with, for example, the fuel adjustment clause here in Florida. CHAIRMAN CLARK: Go ahead.

BY MR. HOFFMAN :
Q Dr. Whitcomb, are you familiar with the fuel adjustment clause mechanism in Florida?

A In general terms.
Q Okay. Could you give us your general understanding of how that clause works and why it exists?

A The clause exists because there are certain uncontrollable factors to the utility, that they cannot control the price of fuel. And hence, when the price of fuel changes, the fuel adjustment clause essentially passes that along directly in a very timely fashion into rates on an automatic basis.

Q Do you see any similarities between that fuel adjustment clause and SSU's proposed weather normalization clause?

A Of course.

Q What would those be?
A That the -- I guess the point here is that Florida's water consumption is the most variable in the country on an annual basis, if you look at it, mainly due to weather. Its unpredictability is, makes it very likely, actually the risks, it is a tremendous risk that actual consumption will not

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equal potential projected consumption. To that extent, the WNC is going to mitigate that for the customers and the company.

Q Yesterday Mr. McLean asked you a number of questions concerning your qualifications. And I believe at one point Mr. McLean asked you yesterday if you are an expert on water demand elasticity. Do you recall those questions?

A Yes.
Q And I believe that your response to Mr . McLean was that you are an expert on water demand elasticity, do you recall that?

A Yes.
Q What is the basis for your statement?
A Well, if you look at my education through undergraduate, and then into graduate school, it is focused on water demand analysis almost exclusively. In graduate school at Johns Hopkins University I was the -- my faculty adviser was one of the foremost authorities on water demand analysis, John Bowland.

Since then I've published a number of articles on water demand analysis. I've conducted over 30 studies on water demand analysis in a consulting capacity over the last ten years concerning almost exclusively water and sewer
customers.
I've worked for the World Bank. I've worked for two utilities on water demand, on water price elasticity studies here in Florida. And currently, $I$ am the principal investigator of a large empirical project going on in the southwestern U.S.. The folks out in the southwest reviewed the swfwmd price elasticity study, and a companion or sister project is currently on way going -- being conducted there. That's the states of California, Arizona and Nevada.

And I would like to point out that Dr. Phil Halberson at the Las Vegas Valley Water District was very impressed with the SWFWMD study. That is why he funded this next project.

Q Dr. Whitcomb, do you believe Dr. Dismukes to be qualified to analyze and comment on a water demand elasticity study?

MR. MCLEAN: Objection, way beyond the scope of cross.

MR. HOFFMAN: Madam Chairman, there were numerous questions directed by Mr. McLean yesterday to Dr. Whitcomb on the issue of Dr. Dismukes' ability to comment on the price elasticity study. I think --

CHAIRMAN CLARK: I will allow the

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question.
MR. HOFFMAN: Thank you.
WITNESS WHITCOMB: I would think in this capacity before the Commission of reviewing the credibility of our study, that someone like Dr. Beecher that was here earlier, who has a command of water pricing policy, and knows -- I know she has done literature reviews and knows the subject matter very well -- may have, would have been a, I would have accepted as more of a more appropriate peer.

In looking at Dr. Dismukes' resume I cannot see that he has ever done an empirical water price elasticity study. In his comments he makes in his direct testimony, he shows to me that he doesn't have a mastery of the literature on the subject. Specifically, he declares that the SWFWMD price elasticity study has low explanatory power.

If you look at the genre of models that are in the literature, those look at a cross section of homes among utilities, they look at monthly observations over a time series. Within the genre, the SWFMD study has relatively high explanatory power, unlike what he claims.

There is one other factor, I think Dr.
Dismukes probably is a very good energy economist.

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And he has some impressive credentials. But when you move into the water field there is a number of specific factors that are specific to the water industry, which you have to learn about. And one point is that Dr. Dismukes claims that SSU's prices are essentially a non-block, uniform rate structure, and he characterizes that when he compares it to the SWFMD study.

It is a very common mistake for people that don't deal with this on a daily basis, they ignore the sewer side of it all. Sewer prices, of course, can be part, are an important part or the other half of the price signal being sent out here of rates in Florida. So that he didn't recognize the total pricing, the pricing going on.

Q I think in response to one of Mr. McLean's questions yesterday concerning Dr. Dismukes' recommendation that 50 percent of the price elasticity adjustment be approved, I think one of your responses to that suggestion was that he just took the number out of a hat; is that correct?

A Correct.
Q What is wrong with that?
A There is no evidence that he has to base it on. The important point here to be made, and it is

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an important one, is that it is not between what the estimate, water rate estimate and zero. That is not the basis. It is just as equally likely that the price elasticity adjustment will be greater than our estimate than lower.

So in looking at that it is almost saying, well, it could be just as equally likely be 20 percent instead of about the 11 percent, 10 percent, 11 percent level that I've estimated. So on that basis, you know, you can't just arbitrarily pick a number that seems -- that doesn't have any evidence to support it.

Q I just have a few more questions, Dr. Whitcomb. Commissioner Deason asked you some questions concerning your Exhibit JBW-3, page 20 of 153.

A Correct.
Q Do you have that in front of you?
A Yes.
Q I think he asked you the based facility charge and gallonage charge information for the City of Venice utility. Do you recall that?

A I provided the gallonage charge information and I didn't have the base facility charge information available.

Q Thank you. Do you have the gallonage charge information or other rate information for the other utilities which are shown on that page?

A Yes.

Q Could you please provide that information right now?

A The list of all the gallonage charges over time is listed on pages 97 through 100, JBW-3.

Q So that information is in the record?

A Yes.

Q All right. Dr. Whitcomb, Mr. McLean asked you a number of questions concerning what was identified as Exhibit 136. Do you have that document in front of you?

A Sorry, I can't find it right at this
minute.

Q I will hand you a copy of it.

A Yes.

Q If you would turn to page 10 of exhibit
136.

A Yes.

Q You executed a release; is that correct?
A Yes.
Q What is the date you executed that
release?

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A January 10, 1996.
Q Okay. As I understand it, you were requested to do so earlier in your deposition; is that correct?

A That's correct.
Q Did Public Counsel thereafter request you to take any further action with respect to the information that is identified in that release?

A There was an interrogatory where I was essentially asked to provide all the information on the first set of peer review of the article. I told them at, through that, in that interrogatory or document request response that had been discarded back in 1994. Later on he comes and I was sent a release form which I sent to the journal. The journal did not -- ended up not having this first round either. They had discarded it. And that is what I have done in this effort.

Q Has anyone from Southern States advised you to be anything less than full and forth right in responding to the discovery request in this case?

A No.
MR. HOFFMAN: Thank you, Dr. Whitcomb.
That's all I have.
CHAIRMAN CLARK: Exhibits.

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MR. HOFFMAN: We would move Exhibit 135.
COMMISSIONER CLARK: without objection
Exhibit 135 will be admitted in the record.
(Exhibit No. 135 admitted.)

MR. HOFFMAN: 136.
CHAIRMAN CLARK: Without objection Exhibit
136 will be entered in the record.
(Exhibit No. 136 admitted.)

MS. CAPILISS: Staff moves Exhibits 137
through 141.
CHAIRMAN CLARK: Without objection,

Exhibits 137 through 141 will be admitted in the record.
(Exhibit Nos. 136 through 141 admitted.)

CHAIRMAN CLARK: Thank you, Dr. Whitcomb.
You are excused. We will take a break until a quarter after 12:00. You can order what you want or make arrangements for lunch. We will take no further long breaks after that. Thank you.
(Brief recess.)

CHAIRMAN CLARK: We will call the hearing back to order. Mr. Armstrong, I take it Ms. Lock is your witness.

MR. ARMSTRONG: Yes, she is, Madam Chair.

CHAIRMAN CLARK: Okay. Let's just hang on

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just a minute. Mr. Beck, we are just beginning to go through the formalities for Ms. Lock:

All right. Go ahead, Mr. Armstrong.
MR. ARMSTRONG: Thank you, Madam Chair.
DALE G. LOCK
was called as a witness on behalf of Southern States Utilities and, having been previously duly sworn, testified as follows:

## DIRECT EXAMINATION

BY MR. ARMS'TRONG:
Q Ms. Lock, do you have before you 30 pages of questions and answers which constitute your prefiled direct testimony in this case?

A Yes, I do.
Q If I were to ask you the questions contained in that 30 pages would your answers be the same?

A Yes. There would except I would like to make one change in my direct testimony.

Q What change would that be?
A On Page 11, line 10, I would like to change the figure 16.03 percent to 12.9 percent.

Q With that change would you -- if I asked you the questions contained in that 30 pages would your answers be the same?

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A Yes, they would.
MR. ARMSTRONG: Madam Chair, we would
request that the 30 pages of prefiled direct testimony of Ms. Lock be incorporated into the record as though read.

MS. CLARK: Before $I$ do that, let me just check and make sure she has been sworn in.

MR. ARMSTRONG: Ms. Lock, have you been
sworn in?
WITNESS LOCK: Not today.
BY MR. ARMSTRONG:
Q You were the other day?
A Yes.
CHAIRMAN CLARK: Okay. Then you were for this proceeding.

BY MR. ARMSTRONG:
Q That carries over until today.
A Thank you.
Q You are also sponsoring four exhibits, is that correct?

A Yes, that's true.
Q Do you have any changes to those exhibits?
A No, I do not.
MR. ARMSTRONG: Madam Chair, we request
that the prefiled exhibits of Ms. Lock be identified
with the next available exhibit number.
CHAIRMAN CLARK: First, the prefiled direct testimony Ms. Dale Lock will be inserted in the record as though read. And give me the page numbers or the numbers on her exhibits.

MR. ARMSTRONG: That would be DGL-1 through

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DGL-4.
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CHAIRMAN CLARK: Okay. DGL-1 through 4 will be marked as Composite Exhibit 142.

MR. ARMSTRONG: Thank you.
(Prefiled direct testimony inserted as

# DIRECT TESTIMONY OF DALE G. LOCK, CCP 

 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION ON BEHALF OF SOUTHERN STATES UTILITIES, INC. DOCKET NO. 950495-WS
## Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

A. My name is Dale G. Lock and my business address is 1000 Color Place, Apopka, Florida 32703.
Q. WHAT IS YOUR POSITION WITH SOUTHERN STATES UTILITIES, INC.?
A. My position is Manager of Human Resources for Southern States Utilities, Inc. which I will refer to as "SSU" or the "Company".
Q. WHAT IS YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE?
A. I am a Certified Compensation Professional by the American Compensation Association with 20 years of human resources management experience, 13 years of which are in the regulated utility industry. I obtained my Bachelor of Science degree in 1973 and a Masters in Science degree in Industrial Psychology from the University of Central Florida in 1977. I was employed for six years in the Human Resources department of Florida Power Corporation where I was responsible for administering compensation, benefits and policies. I also spent five years with General Telephone of Florida where $I$ was responsible for employment test development and validation; compensation, supervisory and management skills assessment; and EEO and affirmative action programs. I also worked for the University of Central Florida for five years where I was responsible for all aspects of personnel administration. Finally, I spent
three years with Assessment Designs, Inc. where I designed management and supervisory skills assessment center simulation exercises and performed assessor training.
Q. WHAT ARE YOUR PRESENT DUTIES AS MANAGER OF HUMAN RESOURCES ?
A. I began my employment with Southern States in February 1993 as Human Resources Administrator. In November 1994, I was promoted to the position of Manager of Human Resources. My duties include the development and administration of SSU's human resources programs and policies in the areas of recruitment, equal employment opportunity, employee relations, training, benefits, compensation, job evaluation, and performance appraisal. I am responsible for the content and administration of our employee benefits programs including the Defined Benefit Pension Plan, 401(k) Savings Plan, Medical/Life/Dental Plans, Short Term Disability, Group Long Term Disability Plan and Pre-tax Dependent \& Medical Reimbursement Account, Employee Assistance Program, Unemployment and Worker's Compensation.

## Q. WHAT ARE YOUR PROFESSIONAL AFFILIATIONS?

A. I am a member of the American Compensation Association, the Society for Human Resources Management and the Industrial Relations Research Association.
Q. HAVE YOU EVER TESTIFIED BEFORE THE FLORIDA PUBLIC

| $\sim$ | 1 |  | SERVICE COMMISSION? |
| :---: | :---: | :---: | :---: |
|  | 2 | A. | Yes. I testified on behalf of Southern States in Docket No. 930945-WS, |
|  | 3 |  | the statewide jurisdiction docket. |
|  | 4 | Q. | WHAT IS THE PURPOSE OF YOUR TESTIMONY? |
|  | 5 | A. | I will describe Southern States' experience with FASB 106, provide |
|  | 6 |  | information supporting Southern States' requested payroll costs, and give |
|  | 7 |  | an overview of Southern States' human resources, payroll and training |
|  | 8 |  | departments' operations which are designed to maximize efficiencies, |
|  | 9 |  | reduce costs and provide our customers with a labor force capable of |
|  | 10 |  | providing safe, efficient and sufficient service statewide. |
|  | 11 | Q. | COULD YOU BRIEFLY DESCRIBE THE HISTORY OF FASB 106, |
| - | 12 |  | CONCENTRATING SPECIFICALLY ON HOW IT HAS IMPACTED |
|  | 13 |  | SOUTHERN STATES? |
|  | 14 | A. | In December, 1990, the Financial Accounting Standards Board adopted |
|  | 15 |  | SFAS No. 106 which was generally effective for fiscal years beginning |
|  | 16 |  | after December 15, 1992. I will refer to SFAS No. 106 as "FASB 106." |
|  | 17 |  | FASB 106 addresses the recognition and measurement of post-retirement |
|  | 18 |  | benefits other than pensions, which I will refer to as "OPEBS." OPEBS |
|  | 19 |  | are benefits that the employee receives from the employer when the |
|  | 20 |  | employee retires and are made up of medical care, dental care, life |
|  | 21 |  | insurance and other miscellaneous benefits. FASB 106 changed the |
|  | 22 |  | accounting for OPEBS from the "pay as you go" method (cash basis) to |

an accrual basis which recognizes the expense when the employee earns the benefits. In other words, FASB 106 requires Southern States to recognize OPEB costs as a liability on the Company's financial statements when they are earned, over the employee's working life similar to pension benefits and not when the benefits are paid.
Q. HAS SOUTHERN STATES ADOPTED FASB 106?
A. Yes. The Company adopted FASB 106 on January 1, 1993.
Q. IS SOUTHERN STATES REQUESTING RECOVERY OF ITS OPEB COSTS IN THIS PROCEEDING?
A. Yes. Southern States seeks OPEB cost recovery since the expense for OPEBs should be recovered as the employer accrues them. OPEB expenses should be paid for by the ratepayers for whom the employee is performing services rather than future ratepayers. Southern States' OPEB costs for the year ended December 31, 1994 were $\$ 848,032$. Exhibit 142 (DGL-1) contains a copy of the actuarial valuation report of our OPEB costs projected for the year ended December 31, 1994. The valuation study was performed by Godwins, Booke and Dickinson.
Q. WHAT IS THE PROJECTED 1995 NET PERIODIC OPEB COST INDICATED IN THE MFRS?
A. The actuarially estimated 1994 net periodic OPEB cost is $\$ 848,032$. We are not yet in receipt of the 1995 actuarial valuation report as of the time of submission of the application for a rate increase in this proceeding. In

1995, to reflect prior Commission orders, SSU budgeted only $\$ 787,150$ for above the line cost and $\$ 60,882$ for below the line cost based upon a weighted average of Commission disallowances in those prior proceedings. In other words, SSU did not increase this budgeted cost in the MFRs to reflect the prior total company OPEB costs of $\$ 992,525$ which the Commission had previously authorized in the Marco Island rate proceeding, Docket No. 920655-WS. The company will update the 1995 and 1996 OPEB costs upon receipt of the actuarial valuation which is expected in late June.

Since the Company is requesting final revenue requirements for the projected year ending December 31, 1996, we have increased the 1995 OPEB costs indicated in the MFRs $(\$ 787,150)$ for that period by $8 \%$. The $8 \%$ increase reflects the 1996 rate of medical inflation projected by Godwins, Booke and Dickinson. Using an $8 \%$ medical inflation factor results in a 1996 total OPEB cost of $\$ 850,122$. We believe the 1996 projection to be a conservative estimate based upon preliminary analyses of 1995 OPEB costs conducted by Godwins, Booke and Dickenson.

## Q. HAS THE COMMISSION AUTHORIZED SOUTHERN STATES TO

 RECOVER OPEB COSTS IN THE PAST?A. Yes. As I just mentioned, most recently, in Order No. PSC-93-1070-FOFWS in Docket No. 920655-WS, (Marco Island), the Commission approved total Company OPEB costs of $\$ 992,525$. The Commission's determination
related to a projected test year ended April 30, 1993. As I also indicated earlier, SSU did not include the $\$ 992,525$ in the MFRs. However, we intend to request that the Commission permit SSU to recover the actual OPEB costs to be reflected in the Godwin's Actuarial Valuation report for 1995, increased by $8 \%$, in final rates. If the actuarial valuation we will receive shortly exceeds the foregoing OPEB cost indicated for 1996 in the MFRs, SSU will so notify the Commission and parties to this proceeding and will request that the difference be used as an offset to any deduction, if any, which the Commission may make to SSU's requested revenue requirements.
Q. PLEASE DESCRIBE SOUTHERN STATES' EFFORTS TO CONTROL OPEB COSTS SINCE THE COMMISSION ISSUED ITS ORDER IN DOCKET NO. 920655-WS.
A. Before describing our efforts since the order was issued, it must be understood that the record in Docket No. 920655-WS confirmed that Southern States already had taken significant steps in 1992 and 1993 to control OPEB costs prior to the issuance of that order. These cost control measures included: significant steps to reduce costs by adopting and communicating specific cost containment measures such as increasing employee deductible amounts, decreasing SSU's reimbursement amounts for using out-of-network medical providers and user cost sharing by significantly increasing both retiree and active employee premium
contributions. Since then we have implemented further cost control measures in each of the plan years for 1994 and 1995. Some highlights of additional cost containment measures are as follows: significant medical plan and coverage re-design to reduce excessive utilization costs; additional new coverages provided for preventive care and physicals; adoption of more aggressive managed care with professional utilization review and use of a primary care physician as a gatekeeper; hospital, surgical and mental health care precertification requirements; increased deductible and coinsurance amounts; introduction of a two (2) tier plan; and escalated premium structure and conversion from an insured plan to a lower cost, self-funded plan governed by ERISA. I note that if it were not for SSU's size, we would not have been able to convert to a lower cost self-funded plan at all. The specific control measures implemented during the period 1992 through 1995 are provided in Exhibit/LQ (DGL-2).

As further confirmed during Docket No. 920655-WS, Southern States' OPEB benefits program as a whole provided somewhat lower benefits to our retirees than the average plan of 77 utilities nationwide, eight of which were Florida utilities. In fact, Southern States' medical plan benefits to retirees at age 65 and over were the least generous of the Florida utilities. Since that docket, we have not increased medical plan benefits to active employees nor retirees and have been very aggressive in medical plan cost control measures. In view of the forgoing, I believe it is likely that SSU's benefits remain below the average of utilities nationwide.
Q. DO YOU HAVE ANY OTHER INFORMATION WHICH CONFIRMS THE REASONABLENESS OF THE OPEB COSTS SOUGHT BY SOUTHERN STATES FOR THE YEAR ENDING DECEMBER 31, 1996 ?
A. Utilities have traditionally attempted to offset lower pay rates than general industry by providing superior employee benefits. SSU's medical plan benefits, however, are only average when compared to general industry. SSU's medical, life, dental and long term disability costs as a percent of payroll, are $11.1 \%$. This ratio of medical benefits dollars as a percent of total payroll dollars is identical to the national average of $11.1 \%$ for 1,057 employers reported in the most recent 1994 national Chamber of Commerce Employee Benefits Survey. Further evidence of the effectiveness of our benefits cost containment measures is the fact that SSU's medical related benefits increased by $2.28 \%$ from 1992 to 1993 while the same 1,057 Chamber of Commerce surveyed companies increased medical related benefits costs by $7.7 \%$ in the same period. Based on these facts, we believe that SSU's medical benefits are consistent with the average for all industry and are thus reasonable. Further SSU's medical cost containment measures have been more successful than general industry as a whole.
Q. COULD YOU DESCRIBE SOUTHERN STATES' REQUESTED PAYROLL AMOUNT FOR THE PROJECTED YEAR ENDING DECEMBER 31, 1996, INCLUDING AN EXPLANATION OF THE COMPANY'S PROJECTION OF PAYROLL INCREASES SINCE THE HISTORIC YEAR ENDED DECEMBER 31, $1994 ?$
A. Yes. For purposes of this filing, Southern States began with the actual payroll for the historic year ended December 31, 1994. Pay increases for merit increases are budgeted at $3 \%$ for both the years 1995 and 1996. Three percent was the percentage of 1994 actual merit spending. Pay increases for promotion are budgeted at $1.0 \%$ in both 1995 and 1996, again based on $1 \%$ actual promotion increase spending in 1994. Pay increases for license attainment are budgeted at $.25 \%$ in both 1995 and 1996 again based on the same percent of 1994 actual spending. The step adjustment pay increases for hourly non-technical employees have been phased out following the last increase given on March 2, 1995. The market adjustments recommended in the Hewitt Study will replace the step adjustment increases. Market and equity adjustments are budgeted at $1.5 \%$ in 1995 and 1996.

In addition to the $1.5 \%$ equity adjustments budgeted, SSU is seeking an additional $4.77 \%$ market pay adjustment to bring SSU and Buenaventura Lakes employees closer to competitive market levels. This market adjustment represents a significant addition to payroll expense included in the Company's request for the projected test year ending December 31, 1996.
Q. WHY IS SSU PROPOSING MARKET BASED SALARY ADJUSTMENTS?
A. Hewitt Associates conducted an independent external market compensation study for SSU which incorporated pay data from eighteen different survey sources. Hewitt compared SSU's pay for 50 different benchmark job classifications against other state and national employer actual average pay. Hewitt used data from employers who operate within the geographic locations where SSU recruits and hires employees. I will refer to this study as the "Hewitt Study." A copy of the Hewitt Study is provided as Exhibit/42(DGL-3). The most notable below market pay rates were for those paid to: plant operators, plant maintenance, rate department and customer service personnel. These job categories comprise over $60 \%$ of all SSU positions. To ensure the survey comparisons were relevant, all plant operations, maintenance and meter reading jobs were compared exclusively against the Florida League of Cities Wage Survey. Florida cities and counties are among our toughest competitors for employees. In 1994, Florida cities and counties paid from $11 \%$ to $22 \%$ more than SSU for the same job. Overall, SSU's pay rates for the job categories analyzed were found to be on average $17.3 \%$ below the surveyed market.
Q. HAVE YOU EXCLUDED RATE DEPARTMENT POSITIONS FROM

YOUR REQUESTED 1996 PAYROLL ADJUSTMENTS, AND IF SO, WHY?
A. The SSU company-wide comparison of average pay to market average pay was recalculated excluding the Rate Department positions. The comparison group for the majority of Rate Department positions was the electric utility industry. Because the Rate Department positions were so far below the comparison market it was believed that including the Rate Department positions would skew the study results. This is confirmed by the fact that by excluding solely the Rate Department positions, the SSU $12.9 \%$ company-wide comparison number drops to $16.03 \%$ below the average market pay. According to Hewitt, when actual pay levels are within $+/-5 \%$ of the market, they can be considered to be fully competitive. Assuming that pay rates within $5 \%$ of the market are reasonably competitive, even after excluding Rate Department positions, SSU currently is still more than $11.03 \%$ below competitive market pay levels.
Q. HAS SSU CONDUCTED ANY ANALYSIS TO COMPARE THE COMPANY'S SALARY STRUCTURE, AVERAGE SALARY AND TURNOVER RATES TO THE SALARY STRUCTURE, AVERAGE SALARY AND TURNOVER RATES OF OTHER COMPANIES?
A. Yes, and in summary, SSU's salary structure and average salaries are far below market while SSU's employee turnover rates exceed the market significantly.

Salary Structure. Salary structure refers to the pay ranges to which jobs are assigned, in other words, the minimum and maximum of pay ranges to which specific jobs are assigned. The SSU salary range structures were originally established based upon 1988 salary survey data. The last time SSU revised these salary ranges was in 1990 when they were adjusted upward by $2 \%$. No adjustments in salary structure have been made since then.

According to the Hewitt survey data, southern U.S. companies, on average, raised their salary structure annually by $2.5 \%$ for hourly and $3.2 \%$ for exempt employees in 1992, $2.6 \%$ hourly and $3.0 \%$ exempt in 1993, and 2.3\% hourly and $3.0 \%$ exempt in 1994. All Florida companies on average raised their salary structures by $2.1 \%$ hourly and $2.4 \%$ exempt in 1992 , $2.2 \%$ hourly and $2.7 \%$ exempt in 1993 , and $3.0 \%$ hourly and $3.1 \%$ exempt in 1994. The foregoing demonstrate that for these three (3) years the Florida labor market experienced a $7.8 \%$ compound growth rate in salary range structures. This indicates that Florida employers on the average increased their salary pay grade minimums and maximums by $7.8 \%$ in those three years. During this same period, SSU was unable to increase the salary ranges for our positions, thus SSU fell farther behind the competitive labor market.

Salaries. According to the Hewitt survey data, in 1993, average overall salary increase budgets in Florida were $4.0 \%$ hourly and $4.4 \%$
exempt and, in 1994, $4.1 \%$ hourly and $4.4 \%$ exempt. In the two years from 1993 to 1994, the average Florida employee thus received an $8.57 \%$ compound increase in earnings. At SSU, during this same two year 19931994 interval, SSU's more conservative salary increase budgets for merit, equity and step adjustments reflected a compound growth rate of $7.2 \%$. The actual growth in SSU's actual average pay increased by only $1.44 \%$ or from $\$ 27,168$ in 1993 to $\$ 27,560$ in 1994. This fact confirms that, proportionately, SSU is filling more lower paid operator, maintenance and customer service classifications than higher paid positions. Despite SSU efforts to keep up with external market annual pay rate increases in the past few years, SSU's pay rates have remained significantly below the external labor market. As I indicated above, the average SSU employee earned a base compensation of $\$ 27,168$ as of $12 / 31 / 93$. In contrast, in the most recent 1993 National Association of Water Companies (NAWC) survey of Investor-Owned Water Utilities, the average compensation for employees of investor-owned water utilities in the southern United States was $\$ 34,585.97$. Average compensation nationally for investor-owned water utility employees in 1993 was $\$ 39,109.15$.

SSU has not been financially able to implement company-wide salary adjustments due to our current and historically low earnings position.

Turnover. As a result of our non-competitive wage and salary
scale, SSU also has experienced high rates of turnover, as well as difficulty recruiting. The percentage of turnover in 1992 was $13.2 \%$, with 62 out of 469.5 employees separating from SSU's service. The percentage of turnover in 1993, was $13.5 \%$, with 66 of 489 employees separating from SSU's service. Excluding the Venice Gardens sale and customer service office consolidation which took place in 1994, the percentage of turnover was $11.54 \%$ with 58 out of 502.5 employees separating from SSU's service in that year. SSU turnover to date in 1995 has been $11 \%$ on an annualized basis, with 13 employees separating from service in the first quarter.

These turnover rates are substantially higher than the national and southern United States averages. According to data published by the Bureau of National Affairs ("BNA"), which tracks monthly turnover and reports the national average for all companies nationwide, all U.S. companies averaged $10.8 \%$ turnover in 1994. The significance of this statistic is that it includes turnover experienced by retailers and the fast food industry which have turnover rates which can exceed $100 \%$. Approximately 65\% of SSU's preventable turnovers in 1993 and in 1994 were employees who had less than 3 years of service. In fact, in 1993, nearly $31 \%$ of the personnel who separated had less than 1 year of service. In 1993, we compared our average annual turnover to that of other utilities: Orlando Utilities Commission $4.8 \%$, Florida Cities $3.96 \%$, Collier

County's Utility Division $9.72 \%$ and Minnesota Power 5.4\%. Obviously, our $13.5 \%$ turnover rate is abysmal by comparison to these other utilities. High turnover contributes to higher recruitment costs as well as lowered employee productivity and added retraining costs. Ultimately, SSU's customer service and operating efficiency suffer when trained employees cannot be retained.
Q. HAS SSU DONE ANYTHING IN THE PAST TO CONTROL TURNOVER?
A. Yes. As new inexperienced employees are hired at entry level rates, they are compressed at the low end of their respective pay ranges. To improve retention of these employees and offset lower salary range compression, administrative and clerical employees in salary grades 10 and below previously were compensated with up to three step adjustments, one in each successive six month period. Each step adjustment was equivalent to approximately $3.5 \%$. In anticipation of SSU's implementation of the market based adjustments indicated in the Hewitt Study, the step adjustment program was discontinued after the last step increases on March 2, 1995.

Also, in response to the loss of field employees, and as a means of improving competitive pay, plant operators and distribution and plant maintenance employees are given hourly pay adjustments for attainment of additional or higher level licenses. The intent of this pay practice is to
give new hires an incentive to attain the training necessary to obtain licenses on an expedited basis and reward them for doing so. However, the job specific market data available in the Hewitt Study indicates that these licensing adjustments alone have not been sufficient to bring SSU pay levels into line with the market.
Q. HAS TURNOVER FOR FIELD PERSONNEL DECREASED SINCE THE LICENSING ADJUSTMENTS WERE IMPLEMENTED?
A. Yes, there has been a modest improvement. Turnover has been reduced to $11 \%$ in 1995 from the $13 \%$ levels in 1992. The Hewitt study, however, demonstrates that for many SSU positions, we are still far below competitive market levels and must remedy the problem to bring turnover to acceptable levels. Please note the double digit percentage increases indicated in the Hewitt Study which would be required for SSU to bring operators to competitive market rates in comparison with the Florida League of Cities Survey.
Q. HAS SSU DONE ANYTHING FURTHER TO CONTROL PAYROLL COSTS?
A. Yes. As a result of SSU's poor 1994 financial results, $\$ 600,000$ was cut from the 1995 labor budget in anticipation of savings resulting from a hiring freeze which was put into effect on 1/1/95. All 1995 vacancies are now being subjected to re-justification and committee review to determine that refilling is absolutely essential to meet regulatory compliance
requirements or to avoid the cessation of critical work.
Also, each year reductions are made in the labor budget to account for turnover. In $1995, \$ 125,000$ was cut from the budget to account for payroll lapse as a result of historical tumover and ongoing vacancy levels. As I indicated earlier, the turnover rate has been high in the past so this reduction to accommodate the high turnover rate is larger than it would be if turnover rates were reduced to more normal levels -- as SSU hopes will occur if the Commission approves our request for salary adjustments consistent with the Hewitt Study.
Q. DOES SOUTHERN STATES PROPOSE TO IMPLEMENT THE CHANGES SUGGESTED BY THE HEWITT STUDY?
A. Yes. In 1995, SSU began implementing competitive market adjustments equal to $1.5 \%$ of payroll in order to accommodate a portion of the adjustments indicated in the Study. Southern States believes it is necessary to acknowledge and remedy the salary deficiencies identified in the Hewitt Study and reduce resulting high turnover rates as quickly as possible. SSU's inability to adequately adjust salaries to competitive market levels has been occasioned by our very poor financial results. However, we believe that the high turnover levels we have been experiencing cannot continue indefinitely without adversely impacting quality of service and ultimately costing SSU and our customers more in the long run than the salary adjustments we are proposing. Already, our deficient salary levels
have resulted in SSU's inability to recruit and retain employees. The high rates of turnover have caused increased recruitment and re-training costs as well as reduced efficiencies and lowered productivity due to a loss of trained personnel. Ultimately these costs harm our customers. Once Southern States' salary structure is adjusted to better reflect market realities, we believe that reduced productivity during training and orientation, deficiencies in experience and training levels of our employees, employee recruitment costs, and other costs will be mitigated. For these reasons, we have projected adjustments of our salary structures. In 1996, adjustments of $\$ 711,405$ or $4.77 \%$ for SSU and $\$ 27,916$ or $4.76 \%$, for former employees of Orange Osceola Utilities who will be SSU employees by 1996 (serving the Buenaventura Lakes facilities) were budgeted separately to achieve one-half of the balance of the pay adjustments necessary to bring SSU into a competitive market position. As I previously indicated, our ultimate objective is to pay within $5 \%$ of the comparable labor market so adjustments in future years also will be required.
Q. PLEASE INDICATE WHETHER SSU MAINTAINS THE SAME EMPLOYEE POLICIES AND BENEFITS FOR ALL SSU EMPLOYEES.
A. SSU maintains the same employee policies and benefits for all of its employees, wherever in Florida they may be located or providing service.

These policies and benefits will apply to the current employees of Orange Osceola Utilities who will become SSU employees. Employee policies and benefit programs are developed, implemented and administered by the Human Resources Department in Apopka.

For example, with regard to timekeeping practices specifically, SSU has established uniform policies regarding work hours, overtime, breaks, meals, shift differentials, sick time off, vacations, etc. The interpretation and application of these policies or any pertinent laws or administrative rules regarding working hours is the responsibility of the HR Department in Apopka.

Payscales also are uniform within the same job classification, regardless of where an employee is based, with the exception of Marco Island which has a geographic wage deferential for licensed operators. Payscale, wage and salary administration, job classification, job description, job evaluation, job placement, performance appraisals, annual merit increases, promotional/demotional salary adjustments, salary surveys, and incentive pay plans are centrally developed, implemented, and/or administered by the HR Department in Apopka. I will discuss these issues later in this testimony.

Benefit programs include, but are not limited to, comprehensive and major medical benefits; a medical/dependent care flexible reimbursement account; life insurance; accidental death and dismemberment insurance;
long-term disability insurance; $401(\mathrm{k})$ savings defined contribution plan; defined pension plan and employee assistance plan.

Additional policies and programs developed, implemented and administered statewide from Apopka by the HR Department include, but are not limited to, the following list: Equal Employment Opportunity, Hiring Practices, Sexual Harassment, Alcohol and Drugs, Smoking Policy, Conflict of Interest, Pre-Employment Physical, Relocation Policies, Employee Records Administration, Training and Educational Assistance, Safety and Health Standards, Separations Procedures, Employee Discipline, Death of an Employee, Death of a Retiree, Exit Interview Process, and Discipline.
Q. CAN YOU IDENTIFY ANY RECENT CHANGES BY SOUTHERN STATES' HUMAN RESOURCES DEPARTMENT WHICH HAVE ASSISTED THE COMPANY IN CONTROLLING COSTS?
A. Yes. In 1995, Southern States became a self-insurer for our medical plan. Were it not for SSU's size, we would not be able to enjoy the lowered costs associated with a self insured medical plan. According to our medical plan consultants, only employers with 500 or more employees can cost effectively self fund a medical plan. Self funding the medical plan will in the long term not only reduce SSU's costs, but also allow us to provide more affordable medical benefits to our employees and lower costs to our customers. A conglomeration of small independent utilities could never
attain the economies of scale that $\operatorname{SSU}$ has achieved in its benefit programs.

As another example of cost savings, in 1993, SSU consolidated its employee $401(\mathrm{k})$ Savings Plan and Pension Plan under one lower cost plan administrator. Consolidation of both plan assets under one investment fund manager and single plan administrator lowered asset fees which are incrementally reduced based on a larger combined dollar volume of assets under management. This consolidation also reduced plan record keeping fees and administrative and testing charges.
Q. DOES THE APOPKA OFFICE APPROVE ALL HIRING AND TERMINATION OF EMPLOYEES?
A. Yes. The HR Department in Apopka assists company supervisors with all disciplinary actions. The HR manager reviews and approves the hiring and termination of all employees. In fact, all aspects of the hiring process are controlled by the recruiter position within HR. Given the location of SSU's statewide facilities, we consider our hiring pool to also be statewide. When a vacancy exists or a new position is requested, the requesting supervisor must complete a "Position Requisition" form. HR reviews Position Requisitions to ensure that they are authorized. All recruiting advertisements are written by the HR Department and placed in appropriate periodicals and newspapers by HR. A statewide recruiting budget (to cover the cost of ads, physicals, drug screens, criminal record
checks, interview expenses and any relocations) is developed annually and administered by HR. Across the state, candidates are instructed to apply in person, or send a resume, to the Apopka office. Applications and resumes are pre-screened by the HR department. A panel of qualified candidates is recommended to be interviewed. A Team Interview composed of panelists from the hiring department or a cross-section of departments and facilitated by HR is conducted on selected candidates. The team reaches a hiring decision and recommends selection of a candidate. HR conducts background and reference checks on finalist candidates. A "Recommendation to Hire" form is submitted to HR which reviews the recommendation and supporting documentation (application, reference checks, etc.), obtains any additional information to ensure that a proper hiring decision has been made, approves hiring and approves or negotiates a starting pay rate with the potential employee.

Following verbal acceptance of an offer by the candidate, a written offer of employment (contingent on successfully completing a job-related physical examination and drug screen) is prepared by HR and signed by the candidate accepting the offer. Once the letter is signed by the new employee, the employee is referred to the company-designated physician for a post-offer physical examination and drug screening, consistent with established corporate policy. The results of the physical are phoned in and sent to HR by the medical provider. Results of the drug screen are phoned
in to HR by the Company's Medical Review Officer. HR informs the local manager of the results of both the physical and drug screen. HR informs any candidate who tests positive on a drug screen of these results in writing through registered mail, indicating that the offer of employment has been withdrawn because the candidate failed to meet the conditions of employment and explaining the candidate's rights of appeal and retesting. If the medical provider suggests that the candidate may not be physically able to safely perform in the vacant position, HR assumes responsibility for determining whether there may be some "reasonable accommodation" (under the Americans with Disabilities Act) that might be made to allow the candidate to perform the essential functions of that job. HR hosts a formal orientation in Apopka for all new employees once every quarter. New employees from throughout the state travel to Apopka for this orientation which lasts about 6 hours.
Q. ARE THERE ANY OTHER ACTIVITIES OF THE HUMAN RESOURCES DEPARTMENT WHICH DEMONSTRATE HOW SSU'S SERVICES APPLY STATEWIDE TO ALL SERVICE AREAS?
A. The HR department is responsible for employee relations activities through the state. All disciplinary actions are discussed, tracked and reviewed by HR to ensure consistency and the fair treatment of all employees. Recommendations to discharge any employees must be submitted to the

Manager of Human Resources for review and then approved by the President. No discharge is approved without full and complete investigation and documentation by the HR Department.

Employee complaints are frequently addressed by HR either directly (in person or by phone) or through the "Pipeline" program which is administered by the Communications department and offers employees an avenue to anonymously submit any complaints or problems through Communications to senior management. HR investigates, documents and resolves charges of sexual, racial, age or disability discrimination or harassment, initiating corrective action when necessary and warranted. HR is constantly seeking avenues to keep their fingers on "the pulse" of SSU's proactive employee relations program. Drug testing mandated by the Department of Transportation (DOT) and by the Florida Drug-Free Workplace Act, is monitored and controlled by HR. Drug testing is accomplished on a number of occasions: Post-Offer, Assignment into a position covered by DOT regulations, Post-Accident (DOT regulated employees), Random (DOT), Routine Fitness for Duty (DOT), Return to Duty and Reasonable Cause testing. All "reasonable cause" drug testing must be recommended by the local manager to the Manager of Human Resources and approved by the Vice President of Finance and Accounting. The HR department also administers and controls the staffing budget for the entire company, statewide, without exception. All operating
regions and support divisions, departments and locations submit justification for current positions as well as requests for additional staff. Overtime, on-call hours and shift differential hours also are requested in the process. New authorizations must be approved by the President.

Finally, the HR department researches and analyzes new or existing legislation and develops the corporate-wide response to these new laws with the assistance of outside counsel, if necessary. Most recently, this analysis has included the Americans with Disabilities Act, Civil Rights Acts and the Family Medical Leave Act. Local Managers and employees at all SSU facilities throughout the state, without exception, are provided information and training on these new laws, as appropriate. In additional, HR serves as a consultant to other departments, examining legislation and assisting in the interpretation of that legislation and the development of Company-wide responses to these laws in concert with other departments. Examples include: the new Family Medical Leave Act, Americans with Disabilities Act, Department of Transportation (DOT) Regulations concerning Commercial Drivers Licenses, DOT Regulations on LP Gas Pipeline Safety, Bloodborne Pathogens Rule, Safety Procedures, Confined Space Entry, Florida Worker's Compensation Law, Equal Employment Opportunity Law, and other legislation. SSU compliance with these requirements, and necessary reports to government agencies, are determined on a company-wide basis, not by plant.
Q. PLEASE DESCRIBE HOW THE INFORMATION YOU HAVE JUST PROVIDED TO THE COMMISSION RELATES TO SOUTHERN STATES' ABILITY TO PROVIDE SAFE, EFFICIENT, AND SUFFICIENT SERVICE TO ITS CUSTOMERS.
A. Human Resources is responsible for ensuring that employees are qualified and able to successfully and efficiently perform the functions of their positions. HR works with each department to set the minimum training, experience and educational requirements for each company position and determines the proper pay grade assignment using a formal job evaluation program. HR ensures that all employees meet the qualifications for the positions for which they are hired and ensures that proper job related training is conducted to keep employees competent to meet their assigned responsibilities. HR ensures that fair employment laws are adhered to and that discipline is fair and necessary to the proper conduct of the business. Through adequate compensation and benefits, the HR department strives to recruit., motivate and retain qualified employees necessary to provide efficient, quality water and wastewater to our customers. All these elements are the essential tasks entrusted to the HR department.
Q. PLEASE DESCRIBE HOW SSU PROVIDES EMPLOYEE TRAINING?
A. All aspects of the training and development of SSU's employees (with the exception of "on-the-job" training) originate from the Apopka office. The
training function is accomplished by personnel from Apopka and is conducted on site, at individual plants throughout the state, as well as at centralized locations at or near the headquarters in Apopka; depending on the topic and the target audience.

As explained by SSU witness Raphael A. Terrero, the Technical Services and the Environmental Compliance and Permitting departments (both located in Apopka) provide technical training on water and wastewater operations-related topics.

SSU also provides management and supervisory training as well as training on Customer Service Techniques, Telephone Etiquette, Computer Use, Computer Software (Word Perfect, Quattro Pro, Windows and others), Leadership, Organizational Development, Team Building and a variety of other topics.

The Communications Department hosts a Quarterly Manager's Meeting at a location near the Apopka headquarters. All local managers throughout the state travel to this location every quarter to receive training on a number of topics and to receive presentations from various departments. This includes the training of managers and employees concerning corporate policies, programs and procedures which affect all employees at all SSU facilities throughout the state.

The HR department is responsible for HR-related training of managers and all employees. This includes, but is not limited to, Drug

Awareness to comply with the Florida Drug-Free Workplace Act, benefits information sharing including $401(\mathrm{k})$ savings plan enrollments, general benefits awareness and education, medical plan and wellness, personnel and pay policies, supervisory training, for example, how to interview, discipline, etc., familiarization with new legislation, for instance, ADA, Family Medical Leave Act, etc., formal employee orientations held in Apopka each quarter for new employees, and communication of personnel policies and other topics.

SSU also offers company-wide training and education assistance programs to reimburse employees for external training/education. Courses which satisfy the requirements for a college degree are covered, as is education that satisfies the requirements for license(s) in:

Water Treatment (A, B, and C)
Wastewater Treatment (A, B, and C)
Distribution Systems (A, B, and C)
Collection Systems (A, B, and C)
Backflow Prevention/Tester

Backflow Assembly/Repair and Maintenance
Cross Connection Control Management
These courses are available either by correspondence course or in a classroom setting at local junior colleges or vocational-technical schools approved by either the Florida Department of Professional Regulation, in
the case of water and wastewater treatment courses, or the Florida Water and Pollution Control Operators' Association or University of Florida TREEO Center in the case of Distribution, Collection, Backflow and Cross Connection licenses. All requests for outside training and education are submitted to the local supervisor and then to HR for review, approval and processing for payment.

The Information Systems department provides specific training pertaining to mainframe computers, the PC network, data security and specialized software and provides programming services to any facility or department wherever located, on request.

Other Apopka based divisions and departments provide training on technical areas within their respective disciplines as well. For example, the Finance Department, which also is located at SSU's Headquarters in Apopka, provides training annually on the preparation of all budgets, annual reports, purchasing, risk management and other finance-related topics in Apopka and at a central location within each region. Other Apopka based departments may be called upon periodically to provide training on a subject within their respective areas of expertise. These include, but are not limited to, Safety, Rates, Customer Service, Engineering, Legal, Environmental Services, Operations Administration, Corporate Development and other areas. Attached as Exhibit $44^{2}$ (DGL-4) is a copy of a recent schedule of training events conducted by Apopka
based personnel for SSU employees.
2 Q. DOES THAT CONCLUDE YOUR TESTIMONY?
3 A. Yes, it does.

BY MR. ARMSTRONG:
Q Ms. Lock, do you have a summary of your direct testimony?

A Yes.
Q Could you please present that now.
A Yes, I will. My name is Dale G. Lock. My position with --

COMMISSIONER KIESLING: I'm sorry, Ms. Lock. Could you get right into the mike. I'm having trouble hearing you.

WITNESS LOCK: Is this better?
COMMISSIONER KIESLING: Much better, thank you.

COMMISSIONER GARCIA: I might suggest that you might want to move over so you don't end up doing it later because I think they like looking into the eyes of -- just one over.

CHAIRMAN CLARK: Mr. Beck, do you need for her to move over?

MR. BECK: No. There are fewer people here today.

WITNESS LOCK: It is okay then?
MR. BECK: It is okay. Are we ready to begin?

BY MR. ARMSTRONG:

Q Yes.
A My name is Dale G. Lock. My position with Southern States Utilities is the Manager of Human Resources. I've specialized in the area of compensation and benefits within the Florida utility industry. I have a Master of Science Degree in industrial psychology, and I'm also a Certified Compensation Professional.

I have more than 14 combined years of experience as a human resources professional working for General Telephone Company, Florida Power Corporation, and currently working for Southern States Utilities since February of 1993.

I am personally very involved in the design and analysis of competitive wage and salary surveys and implemented and administered the same compensation programs for Florida Power Corporation, as well as GTE of Florida.

It is my testimony that $\operatorname{SSU}$ has acted prudently and is in line with common industry pay practices regarding its requested 5.75 percent overall pay increases.

In my written direct testimony on Page 9, I explained that these pay increases which total 5.75 percent are not, quote, attrition adjustments, but
rather are increases to be granted for merit, license adjustments, for license attainments, promotion and equity adjustments.

SSU has not significantly changed the percentage it has annually budgeted and spent for these increases since 1993. These wage and salary increases paid by SSU are lower than those paid on average by other comparable employers.

In SSU's response to OPC discovery, SSU documents the actual amount and percentage of total payroll dollars granted to our employees for merit increase, promotion, equity and license adjustments, in the years 1992, '93 and '94. The historical average paid out for those years was 5.9 percent.

So for the 1996 projected test year, the budgeted 5.75 percent is consistent with $\operatorname{SSU}$ 's past actual pay practices. SSU granted merit increases of three percent of payroll in 1995; and we expect to do the same, three percent, as projected in 1996. Three percent for merit increases, I would like to point out, barely keeps up with the 1995 rate of general inflation, which was 2.8 percent for the year.

The 1993 National Association of Water Company Survey of Investor-Owned Utilities showed that in the south the average pay was over $\$ 34,000$ a
year for investor-owned water employees. SSU's average pay was only $\$ 27,000$ per year, which was about 27 percent below the average paid by other southern U.S. investor-owned water utilities.

One effect resulting from SSU's uncompetitive labor rates has been high turnover. SSU cannot recruit and compete for qualified employees, nor can we retain them. SSU's turnover rate was 13.5 percent in 1993, 11 and a half percent in 1994, and up to 16 percent for the year of 1995.

SSU's turnover rate is triple that of Orlando Utilities Commission, which is 4.8 percent. It is four times the turnover rate for Florida Cities, which was 3.96 percent in that same time.

Two-thirds of those employees who terminate from our employment are hourly paid operators, maintenance technicians, meter readers, and customer service personnel. Of the 16 percent turnover we experienced in 1995, 40 percent of those employees stated in exit interviews that the reason they left SSU was for better paying jobs elsewhere.

SSU Commissioned Hewitt Associates, therefore, to conduct a custom study and make recommendations regarding our pay rates. Hewitt obtained and analyzed comparative pay data from
salary surveys of employers primarily located in the Florida labor market.

For the operations and maintenance positions, they surveyed the counties and municipal utilities surrounding the majority of our locations. SSU's actual average pay would have to be increased by 17.3 percent in order to reach just the average market pay levels, according to Hewitt Associates.

On page 15 of Exhibit DGL-3, Hewitt
Associates shows the specific percentage amounts needed to increase each of the benchmark jobs to even reach average pay levels. For specific examples, the SSU Customer Service Rep I position, the employees average pay was 16,600 , which was 30 percent below the average of $\$ 21,700$ being paid by other employers in Orlando and across Florida for the same job.

SSU's Treatment Plant Operator I positions average pay of $\$ 21,900$ was found to be 11.4 percent below the average paid of 24,000 . SSU's Operator II employee pay, actual pay, was 12.5 percent below average. And for Operator IIIs, our most senior level, they were 22 percent below the average paid by the other utilities.

Based on the results of that study, SSU is asking for an additional 4.765 percent in market base
pay adjustments in the 1996 projected test year. As you can see from the numbers in the exhibit from Hewitt, the 4.765 percent is only a starting point to begin to make progress towards reaching average pay levels in Florida.

SSU is not asking the Commission to allow SSU to become a top payer in Florida among water utilities. At the 4.7 percent, SSU is projecting we are not even asking for an increase in an amount necessary to bring us up to average pay levels. As a result of our current and historically low earnings position, SSU has not been financially able to implement company-wide market base salary adjustments. SSU's below market pay levels have had a cause and effect relationship on our ability to recruit and retain qualified employees.

Thank you
BY MR. ARMSTRONG:
Q Does that conclude your summary?
A Yes, it does.
MR. ARMSTRONG: The witness is available for cross.

CHAIRMAN CLARK: Mr. Beck.
MR. BECK: Thank you, Madam Chairman.
CROSS EXAMINATION

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BY MR. BECK:
Q Ms. Loock, with regard to the Hewitt study, you sent out proposals to a number of different companies to have a market base salary survey done; is that right?

A Yes, I believe we checked several, at least three of them.

Q You sent out a specific request for proposals to the three companies?

A Yes, we did.
Q And did Hewitt Associates provide you the lowest quote for doing that survey?

A At this point $I$ can't recall, but $I$ know that cost was a major component in our decision to select Hewitt. One of the reasons that Hewitt was selected was because I had prior knowledge of their capabilities in working for Florida Power Corporation where they had also done pay studies.

Q And one of the reasons, is it not, that they were a lower cost than others is that there was very little custom surveying they had to do for Southern States Utilities?

A No, sir, that's not correct. In fact, Hewitt did a custom survey which basically amounted to telephone calling other utilities in employed rate

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positions. The study that they did was a custom survey overall.

Q Okay. The custom survey they did for the rate position is the only position for which they did that type of telephone survey, is it not?

A Yes, that is true. And if the Commission would like, we could have conducted a telephone survey of a number of different utilities. However, that would probably have increased our cost somewhere in the neighborhood of 75 to $\$ 100,000$.

It is not customarily the practice of other utilities, such as the ones I can speak from experience, GTE and Florida Power, to do telephone surveys. First of all --

MR. BECK: Objection, excuse me, objection.

CHAIRMAN CLARK: Yes, Ms. Lock, I think you are going quite beyond the question he asked. Your attorney will have the opportunity to ask for further explanation, if it is warranted. So if you would, try and stick a little closer to the question.

THE WITNESS: Okay. We did a custom survey in the same manner as would have been done by other industries utilizing Hewitt and Associates. They use the same methodology in conducting the, quote, custom

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survey for us as they would for any of their other clients. BY MR. BECK :

Q Except for the rate position, Hewitt Associates relied on data they already had in their databases, did they not, to provide this custom study for you?

A Some of the data that was actually provided by surveys that we had, for example, the Florida League of Cities survey was the data that SSU had in its position; but the majority of the surveys were surveys in their database. I believe they had in excess of 18 different survey sources.

Q So you provided the Florida League of Cities survey to Hewitt Associates; is that right?

A That's correct.
Q Then they also utilized surveys that they already had?

A Yes, that's true.
Q And the one place they did the telephone type of survey was for the rate position and that only; is that right?

A That's true. I would like to take the opportunity to explain the nature of the custom study at some point in my discussion today so you can
better understand what was actually done.
Q Thank you. Would you turn to Page 10 of your testimony.

COMMISSIONER KIESLING: Mr. Beck, while she is doing that, I'm having trouble hearing you because the mike is behind you and the one in front of you isn't turned on. Try that. BY MR. BECK:

Q Ms. Lock, are you at Page 10 of your testimony?

A Yes.
Q Here is where you introduce a discussion of the Hewitt study in your prefiled testimony; is it not?

A Yes.
Q Okay. And on line 12, you state that the -- or beginning on line 12 , you say, "The most notable below market pay rates were for those paid to: plant operators, plant maintenance, rate department and customer service personnel;" is that right?

A Yes, that's what it says.
Q Could you turn to your Exhibit DGL-3. That is the Hewitt study, is it not?

A That's correct.

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Q Okay. Could you turn to page 45 of 81 of that exhibit.

A Page 45 of 81 gives the market pricing worksheet for Operator II positions.

Q That is the first item that you listed on the line that we just read about being the most notable below market pay rates?

A No, that is not correct. When I am referring there to plant operators, we have Operator I, Plant Operator II, Plant Operator III, which I think you need to look at Exhibit DGL-3, page 15 of 81. You can see we have a variety of positions that are in the operations department.

We also have welders. We have electricians. We have Maintenance Tech I. We have Senior Maintenance Technician. I can go on, but I think you can get the point from looking at that page. Those are the operations positions.

Q Is Operator I of those positions the one I just directed you to?

A Yes, just one, though.
Q Before we get to that, since you brought up your page 15 of 81 , the summary, that lists the 17.3 percent increase that, as I understood you to say in your summary, that is the amount necessary to -- or
that is the average amount necessary to bring your average pay levels up to market; is that correct?

A If you take all of the percentages shown on page 15, add those up and come up with a simple average, that will give you 17.3 percent. I think there has been some confusion. I would like to clarify this. If you start with a dollar and you add $\$ 0.50$, you've increased by 50 percent. But if you take a dollar-fifty and you subtract $\$ 0.50$, you've subtracted 33 percent.

So there is a difference in going up to a certain level, going up to market level, versus going down from the market level. And I know that was a question that you had in numerous discovery requests and during my deposition.

Q Is it a question I just asked you?
A I don't recall.
Q Now --
CHAIRMAN CLARK: Ms. Lock, let me just caution you to stick to the question. Your attorney is here to get the further explanation that might be needed. Normally, I would be a little more lenient, but we are not making good progress in this case. And we need to have short answers, as well as short questions. Okay?

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WITNESS LOCK: I understand.

CHAIFMAN CLARK: Thank you.
BY MR. BECK :
Q Like I was saying, Ms. Lock, the 17.3 percent on your page 15 of 81 , the derivation of that is shown by adding up those percentages that are shown on the last column; is that right?

A Right, in taking an average.
Q And the percentages are solely those that the Hewitt study found to be below market; is that right?

A These are the total of all of the positions that were surveyed. The ones showing dashes are those that were not below market.

Q And in computing your average, you excluded those where the existing salaries were above market; did it not?

A That's true.
Q So the 17.3 percent is solely an average of those below market, and it excludes those where the pay rates were above market; is that right?

A That's true.
Q Now, could you go to Page 45 of 81 ?
A Okay.
Q This shows two sources that were used to

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derive the base pay for an Operator II; is that right?

A Yes.
Q Is that a plant operator? Could you describe briefly what an Operator II does?

A The designation of $I$ versus II versus III is a function of licensing. So an individual who is a Plant Operator II would have to have a B level license through the Department of Environmental Regulation, Bureau of Professional Regulation. And these individuals could be involved in operating either water or wastewater treatment plants, monitoring plant levels, doing various types of analyses and testing that are required by the DEP.

Q What I would like to do is go through this exhibit to show the mechanics of how the numbers were derived. Okay. Let's start with the first one where it starts with the Florida League of Cities, 10,000 to 50,000 population. Do you see that?

A Yes, I do.
Q That is one of two sources that were used to derive the base market value for an Operator II, is that right?

A Correct.
Q Okay. As we go across the columns, you see

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there is a column for number reported. There is two items under there. What do each of those two items represent?

A Okay. Under number reported, it indicates -- COS would be companies or in this case utilities -- so it would be 36 different utilities and 133 different individuals.

Q And it says a survey effective date of October, '93?

A Yes, I would like to clarify that, if I may. This data has been aged, which is a term used by compensation firms whereby they would take average utility increases for a given year and bring the percentages up to the current date. So this data was aged and amended for 1994.

Q Now, could you answer my question about the October of $\quad 93$, is that the date where the survey was taken?

A Yes, that was the effective date of the survey.

Q The next column is unadjusted database of
25.5?

A Correct.
Q What does that represent?
A That indicates the actual data in the

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survey as of the October, '93 date.
Q That's the base salary for those employees?

A Right, average base salary.
Q And now you have an update factor of 1.07, what does that do?

A This is what I was talking about in terms of bringing the salary up -- actually, I would like to clarify. I think I said 1994. They have updated the survey data to 1995. And this is showing that they assume that during that period their pay would increase by seven percent.

Q So that seven percent factor is applied to the 25.5 to come up with the 1995 salary level of 27.3 ; is that right?

A That's correct.
Q Now, the second source was the Florida League of Cities salary survey for 50,000 plus population, is it not?

A Yes.
Q Okay. And again, we go through the same analysis there to come up for cities and counties of that size, that the basis 28.6 thousand dollars; is that right?

A That's right.

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Q Now, up in the upper right-hand corner there is an estimated market value and a base of 27.9. Do you see that?

A Yes.
Q How was that derived?
A If you look in the last column, just beyond base, it shows weight. That is a weighted average. So in some instances if the surveys were more relevant than others, they might be weighted two or three times the value of a survey that was less relevant. So the base is a weighted average of the two surveys that you see represented for that position on that page.

Q Since here the weights are one, it is just a simple average of those two numbers; is it not?

A Exactly. But in some instances those weightings could be different.

MR. BECK: I would like that as an exhibit marked for identification.

CHAIRMAN CLARK: Mr. Beck, the next exhibit number is 143. The exhibit being marked, which is 143, is an Excerpt from Florida League of Cities Cooperative Salary Survey, dated February, 1994. BY MR. BECK :

Q Ms. Lock, would you tell me when you've had
a chance to look through that exhibit.
A This is not complete. This is not a complete representation of the data shown on Page 45. You are only reflecting one of the surveys. There were two of them, as you can see there.

Q May I ask a question?
A Go ahead.
Q There are two surveys we just discussed in your, that formed that basis for the Hewitt study on Operator II; is that right?

A You only have one.
Q Right. Thank you. This is one for the population 50,000 plus; is it not?

A Yes, but it is not a reflection of everything on that page. You don't have the one for the 10,000 to 50,000 population.

Q That will be the next exhibit, Ms. Lock, if you don't mind.

COMMISSIONER KIESLING: Just answer his question.

WITNESS LOCK: You have in this exhibit for cities over 50,000.

BY MR. BECK:
Q Thank you. That is the basis for the line or the item in the Hewitt study for that segment, the

50,000 plus; is that right?
A I couldn't hear what you said. Could you repeat that?

Q Let me start over. When we would discuss your page 45 of 81 , we went through two sources; is that right?

A Yes.
Q One was the 10,000 to 50,000 population. The second one was the 50,000 plus population.

A That's right.
Q And we saw that the base for the 50,000 plus was 26.7 thousand dollars; is that right?

A Right.
Q And the exhibit $I$ have just handed you is some detail behind that specific figure; is it not? This is the source data for the figure 26.7 thousand dollars.

A For that one figure, yes.
Q We will get to the other one in a moment. Let's focus on this one, if you could. This is the data that Hewitt looked at to come up with the 26.7; is that right?

A I will have to check the dates on this: There is no date on it, so it is hard for me to ascertain if this is the same survey or not.

Q We provided the cover sheet showing the February, 1994 survey of the Florida League of Cities.

A Well, then in that case this is not the same survey because this is October, '93 updated, as we discussed with the update factor. So this is not the same survey date.

Q Doesn't the February survey relate to data that goes to October of '93?

A I cannot make any assumptions regarding this. I have not seen it. It was not used in this study.

Q Let's go through this, Ms. Lock. In the exhibit it includes some of the salaries that were included in the exhibit, for example, Broward County, do they not?

A Are you still referring to the exhibit or where are you now?

Q Yes, on the exhibit, the third page or last page of the exhibit. I want to go through some of the detail.

A Yes, Broward County is on this sheet.
Q And the average pay for Broward County was above the average, was it not?

A It looks like Broward County was not the

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highest, but it is one of the higher ones.
Q Was it above the average, Ms. Lock?
A Yes. The average is 26,000 , and Broward County was 28.

Q Ft. Lauderdale is listed at 33,488 ; is that right?

A That's true.
Q And that is above the average, is it not?
A Right. There are also a number of well below average, like Bay County at 18,000.

Q Ms. Lock, could you just answer the question, please.

A Yes.
MR. ARMSTRONG: Madam Chairman, could I have one second?

CHAIRMAN CLARK: Yes, we will take a break for five minutes.
(Brıef recess.)
CHAIRMAN CLARK: We will go back on the record. Mr. Beck, you were asking questions. BY MR. BECK:

Q Ms. Lock, let's start again on the third page. Broward County is included. And its amount is above the average; is it not?
A.Yes.
$m$

Q The inclusion of Broward County, therefore, tended to bring the average up; did it not?

A Yes.
Q Would the same be true for Ft. Lauderdale at an average salary of 33.5 thousand dollars?

A Yes.
Q Metro Dade, is 32,129 ; is it not?
A True.
Q The inclusion of that of Metro Dade tended to bring the average up; did it not?

A True.
Q Palm Beach County is at $\$ 30,630$; is it not?

A True.
Q The inclusion of Palm Beach County tended to bring the average up; did it not?

A Right.
Q Southern States Utilities has no facilities in any of those counties, does it?

A Not in those counties, but in the majority of the others listed there.

Q You see Jacksonville where the average salary is 40,371?

A Yes, we employ operators in Jacksonville.
Q You see the title there says Water Operator

Supervisor, is it, or does it mean something else?
A Water Operator Supervisor, yes, that's what it says.

Q Why would a supervisor be included in with these other Plant Operator IIs, if you know?

A Yes. I can tell you the answer to that. Each of the jobs included in these surveys contains a job description that is supplied by the entity responding. And in that case, although they call it a supervisor, it would be equivalent to the other positions included on this page.

So it may be some kind of a lead worker or maybe they just use that title for those who have the Plant Operator B Level. There may be some additional duties included.

Q Now, for different cities there are different number of employees that were used to calculate the average; is there not?

A Yes.
Q Is the 26,662 average a simple arithmetic average for all the different facilities, or is it weighted; if you know?

A I believe that is a simple average.
MR. BECK: Could I have a second exhibit marked for identification?

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CHAIRMAN CLARK: Mr. Beck, how many do you
have?
MR. BECK: We have --
CHAIRMAN CLARK: Can we get that done all at once to speed things up?

MR. BECK: I have one more other than that, then a confidential one that has three.

CHAIRMAN CLARK: I think if we could ask all the parties to sort of group their exhibits, that may help speed up the time. You are excused this time, Mr. Beck. The exhibit entitled "Excerpt from Florida League of Cities Cooperative Salary Study, April, '94, will be marked as Exhibit 144.
(Exhibit No. 144 identified.)
COMMISSIONER GARCIA: Madam Chairman, and the one before that was?

CHAIRMAN CLARK: It was February of '94.
COMMISSIONER GARCIA: No, the number of the one before that.

CHAIRMAN CLARK: 143.
COMMISSIONER GARCIA: Is the one that Mr. Beck handed out also, okay.

CHAIRMAN CLARK: Yes.
BY MR. BECK:
Q Ms. Lock, do you have that exhibit in front
of you?
A Yes.
Q And this is for cities 10,000 to 50,000 population; is that right?

A Yes.
Q And that is the other source that is in the Hewitt study that we discussed earlier, is it not?

A Right.
Q The Hewitt study shows 25.5 thousand dollars for this city population, does it not?

A Yes.
Q Is that not the -- is not the last page of the exhibit I just handed you, where it shows an average figure of 25,456 , the source of that number?

A Could you repeat that?
Q On the exhibit I handed you for plant, it has Plant Operator $B$ on the last page of the exhibit.

A Right.
Q And the actual average listed there for Plant Operator B is $\$ 25,456$.

A Yes.
Q Is that not the source of the data that we looked at in the Hewitt study where it shows 25.5 thousand dollars as the unadjusted database?

A Well, the numbers look the same, but the
dates are different. You are using a different dated survey, but the number does seem to be comparable.

MR. BECK: I have the actual survey. Could I just hand this to the witness and see if she can confirm that's where the numbers come from?

CHAIRMAN CLARK: Yes.
WITNESS LOCK: My quandary is not that $I$ don't believe this is from the survey. It is just that the information used in the Hewitt survey was the survey from October of '93. And you are presenting me with an April, '94 survey and asking me if it is the same number in the Hewitt study. My answer to that is, no, these are two different survey dates.

BY MR. BECK:
Q The date on the Florida League of Cities cover is the date that entire publication is published; is it not?

A Yes, but it is not the same date as we used in the Hewitt survey study.

Q The Hewitt survey study shows the date that the salaries were effective, does it not?

A So your position is you believe this is the same survey.

Q In the Hewitt study doesn't it show you the survey effective date of October of '93?

A Yes.
Q And doesn't the data that was published in the April, '94, relate the salaries that were effective on that time period of October, '93?

A I don't know that. What I'm saying is my belief would be that they are not. I don't see anything in here that says October of '93.

Q Do you have the survey that was used as a basis for the Hewitt study?

A I do not have it with me.
Q Okay. Do you know whether it is different than the survey $I$ just handed you?

A I do not know. That is why I'm concerned.
CHAI.RMAN CLARK: Ms. Lock, let me ask you a question. I thought you said that the survey done for you was from October, 1993 data, and then aged for '94. Is that what you said?

WITNESS LOCK: Yes.
CHAIRMAN CLARK: What does the survey date indicate in that document that Mr. Beck gave you?

WITNESS LOCK: This says April of 1994.
CHAIRMAN CLARK: Mr. Beck, I thought you indicated somewhere in that document it says the survey was taken in October of '93.

MR. BECK: I can't point to it at this

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second. The publication is April, '94. This is the same data. Maybe we can speed this along, Ms. Lock. BY MR. BECK:

Q You will be back on rebuttal, will you not?

A Yes.
Q Could you check between now and the time you come for rebuttal and confirm the data I am giving you is, in fact, the data used for the Hewitt survey?

A Yes, I can do that.
Q You will agree for the moment, will you not, Ms. Lock, the number indicated on the actual average indicated on the exhibit I gave you does match the numbers that are taken or that appear in your exhibit for plant operators.

A It is very close.
Q Okay. Let me ask you about some of this data. Deerfield Beach is listed in this city population for an actual average of 31,891 ?

A Yes.
Q And Lake City is at 16,932 . Do you see that?

A I do.
Q Could you explain why there could be that
much variation for the pay for the same position within the same population group?

A Well, I would only be speculating; but apparently, from what I understand, each individual employer has to pay based on their ability to pay. And in that area perhaps they don't have a large tax base, and consequently, are significantly below average as per this survey.

Q Likewise then for this survey, Deerfield Beach, for example, would be on the high side based on their ability to pay?

A Ability to pay or current market conditions for South Florida.
Q. And you don't have any systems in Deerfield Beach, do you?

A No, we don't.
Q I have one more exhibit before we get to the confidential one. Could I ask that be identified.

CHAIRMAN CLARK: The next number $I$ have is 145.
(Exhibit No. 145 identified.)
CHAIRMAN CLARK: While he is passing that out, let me make two announcements. I had an inquiry from Representative Tom Feeney's office. He had
indicated he wanted to be able to make some comments if we took public testimony. I had thought he was going to be here today, but I suppose because things went early this morning he is not here.

I just want to put everyone on notice he has requested that he be able to come and appear. If we hear from him, and he does follow up on the request, he may be here at some point in the hearing.

The other thing is that we will reconvene the hearing after the agenda on Tuesday. And I expect next week will be a very full week. Let me indicate this Exhibit 145 is the "Excerpt From Florida League of Cities Cooperative Salary Survey dated May, '94."

BY MR. BECK:
Q Do you have that exhibit in front of you, Ms. Lock?

A Yes.
Q Could you turn to the last page of that exhibit?

A Yes.
Q This lists wages for Plant Operator $B$ in cities under 10,000 population, does it not?

A Yes.

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Q And if you would, look at a few of them. Clermont has an actual average of $\$ 14,248$, does it not?

A Yes, for one operator.
Q Okay. And do you have any, does Southern States have any systems near Clermont?

A Not that I'm aware of, no.
Q What about Mount Dora, the actual average wage is 19,313?

A Yes.
Q Does Southern States have any systems near Mount Dora?

A Not in Mount Dora, no.
Q Do you have any in that vicinity?
A We have some in Lake County, but no where near Mount Dora.

Q Mount Dora is also in Lake County?
A Yes.
Q Let me ask you about Neptune Beach. Do you know where Neptune Beach is located?

A As a matter of fact, I do.
Q Where is Neptune Beach?
A Neptune Beach, if it is anywhere near
Neptune, it is down in the South Florida area.
Q Would you accept subject to check it is

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-
near Jacksonville Beach?
A Then $I$ guess $I$ don't know where it is.
Q You are not familiar with the Jacksonville Beach where you have Atlantic Beach, Neptune Beach, Jacksonville Beach altogether?

A I'm a Florida native. I've been through most of the parts of the state, but I don't know every city by heart.

Q Well, if you could accept that Neptune Beach is in Duval County, my question to you is we looked earlier at Jacksonville with a salary of about 40,000 for this category. Here is Neptune Beach at 20,000. How would you explain that type of variation in such close proximity?

A Again, I would have to say it is because of their size, complexity of the treatment plants that they have, would have some bearing, their ability to pay based on their tax base.

Q And would you agree that your Jacksonville, or the system that Southern States has in Jacksonville is somewhere between downtown Jacksonville and the Jacksonville beaches; if you know?

A I can't say because I don't really know where these facilities are located.

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Q Now, the actual average for cities of this size is $\$ 22,714 ;$ is that right?

A Yes. That's what this demonstrates.
Q This survey was not an input into the salary survey made by Hewitt, was it?

A No.
Q Why not?
A If you look at the first page, the cities under 10,000 in population, a large number of them have populations around 2,000 or less. So apparently we didn't feel that this was really relevant information for some of these very small facilities. Some of them are little more than package plants that operators run as a side line, although apparently these cities do employ people on a regular basis; but I would assume they have far less complex and size facilities as would sSU.

Q You don't disagree that a number of the locations in this size population are near plants where SSU has facilities, do you?

A I haven't gone through and looked at them one by one. I guess we can start at the top of the list and go through. I would assume there could be some, but I don't know without looking at each one individually.

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Q And so did you never provide the survey with this population to Hewitt and Associates?

A No, we didn't.
Q And it was your decision to withhold this data from Hewitt Associates when they did their data on the Florida League of Cities survey information?

A I did not decide to withhold it, no.
Q But you did not provide it to them, did you?

A No. In fact, I did not have it.
Q Why not?
A Apparently, we didn't think it was relevant data to look at because of the small sizes of these cities.

Q What do you mean apparently? Was this not your decision? Aren't you the interface between Southern States and Hewitt Associates?

A Yes.
Q Why is it apparently so?
A Well, we didn't have this data available to us. We contacted the Florida League of Cities, asked them for their surveys, and actually we didn't see this. But even if we had, I don't think we would have necessarily included it. We might have, but we didn't.

COMMISSIONER KIESLING: Mr. Beck, let me interject something here. When you say "we", I don't know who you are talking about. If you are talking about you and the Hewitt people, or you alone, or you and others at sSU. And it would be really helpful to me if you answered the questions in relationship to what you know; and if you include others, at least identify who they are.

WITNE:SS LOCK: Okay. In this case I would have to say that I did not have this survey available to me, and I did not send it to Hewitt for inclusion in their study.

COMMISSIONER KIESLING: Thank you.
BY MR. BECK:
Q Now, you did include in your information you gave to Hewitt the data for the city populations over 50,000 ; is that right?

A Yes, as well as those for cities from 10,000 to 50,000 .

Q And we saw earlier that the over 50,000 included a number of cities in southeast Florida that brought that average up higher; did it not?

A Yes, but it also included Orlando, Tampa and Jacksonville where we do have facilities.

Q But you don't have any facilities in Palm

Beach, Broward or Dade County; is that correct?
A No, but we do have facilities in the Stuart area of South Florida.

Q Why is the data there any more or less relevant than the data for the cities under $\$ 10,000$ that was not provided to Hewitt and Associates?

CHAIRMAN CLARK: Mr. Beck, $\$ 10,000$ ?
BY MR. BECK:
Q 10,000 population.
A I would think that the two surveys that we included, which encompassed cities from 10,000 up to those over 50,000, were representative of the majority of the positions employed for operators in the state of Florida.

MR. BECK: Madam Chairman, I have packages. Each package has three exhibits in it. This is material that Southern States has claimed to be confidential. I would like to pass that out now to anybody that cares to see this data.

CHAIRMAN CLARK: Next available exhibit number I have is 146. I will indicate it is a confidential exhibit.
(Confidential Exhibit No. 146 marked.)
MR. ARMSTRONG: Madam Chair, I guess for clarity, are we going to have questions asked on this

MR. BECK: Yes.
CHAIRMAN CLARK: He is under an obligation to not reveal the confidential part of the exhibit. We have been fairly successful in accomplishing that in other documents.

MR. ARMSTRONG: I'm sorry, I don't have any experience with this being done. I apologize.

COMMISSIONER GARCIA: It is just us you have to worry about.

CHAIRMAN CLARK: I would assume it is the numbers that are confidential in here; is that correct, Mr. Armstrong?

MR. ARMSTRONG: Yes.

MR. BECK: I will try to go over that before.

CHAIRMAN CLARK: I think Mr. Beck can handle that.

COMMISSIONER KIESLING: If I could get clarified, there is actually three separate exhibits in here. Do you want to call all of them by that number?

CHAIRMAN CLARK: Why don't we do that, Mr.

Beck. We will indicate this is one composite confidential documents. It consists of an excerpt

FLORIDA PUBLIC SERVICE COMMISSION
from the Hewitt study which is VP Finance and Administration. It also contains a calculation of 1994 executive bonuses, and Southern States 1994 incentive compensation plan, all of which will constitute Composite Exhibit 146.

BY MR. BECK:
Q Ms. Lock, let me ask you to direct your attention first to the excerpt from Hewitt study VP Finance and Administration.

A Could I have a moment with our attorney? MR. BECK: Sure.
(Brief pause.)
WITNESS LOCK: Okay.
BY MR. BECK:
Q There is one page attached to the cover page, do you have that?

A Yes.

Q Okay. This is generally in the same format of the exhibit we discussed earlier; is that right?

A Yes.
Q Okay. Now, let me ask Counsel -- well, my first question is why is this being claimed confidential and the other data isn't? I don't understand why this is confidential, but the other stuff is not, and whether you would like to waive
that claim of confidentiality?
CHAIRMAN CLARK: Mr. Beck, does this have a ruling on it yet?

MR. ARMSTRONG: That's what I was wondering.

MR. BECK: Subject to a temporary protective order.

CHAIRMAN CLARK: I don't mean to impede your questioning her in any way. Can't we resolve that later and move on?

MR. BECK: I will try the best I can.
Let me ask this, is it simply the numbers that are claimed to be confidential? I can discuss it if I don't identify the numbers? Is that agreeable with you, Counsel?

MR. ARMSTRONG: That's agreeable. I
apologize. I've never seen the document.
CHAIRMAN CLARK: It is the numbers we need to be --

MR. ARMSTRONG: Yes.
CHAIRMAN CLARK: All right. Go ahead, Mr. Beck.

BY MR. BECK:
Q Now, Ms. Lock, does this reflect the Hewitt study for your VP of Finance and Administration?

FLORIDA PUBLIC SERVICE COMMISSION

A This was draft data that Hewitt compiled that was never actually formalized or used in any fashion.

Q Did Hewitt do a study for your VP of Finance and Administration?

A We initiated one, but it was never completed. This is not complete data. This is a draft.

Q Okay. What information do you have justifying the salary of your VP of Finance and Administration?

A We have other data, actually Minnesota Power conducted a study through a different Hewitt office. That data was never directly provided to SSU; but they, through the Compensation Committee of the Board of Directors, control sSU officer level salaries.

Q And that data, in turn, was never provided to us either; was it?

A I don't believe so.
Q Did you ever disclose you had withheld or that data wasn't provided because it was in Minnesota Power's possession?

A I don't think it was ever asked. I'm not sure how you got this document because it is, as I

FLORIDA PUBLIC SERVICE COMMISSION
say, a draft.
Q If you know, how is the information that Minnesota Power, I guess you wouldn't know since you've never seen the Minnesota Power information yourself, right?

A The Board of Directors Compensation Committee controls that information, and they commissioned a separate study. We began to undertake this study and we were told --

CHAIRMAN CLARK: Ms. Lock, I'm over here. He simply asked you if you had seen that data from Minnesota Power. Did you?

WITNESS LOCK: Not in this format, no. BY MR. BECK:

Q Let's go through this information at least, that we have. There is a number of different sources of information for the vice-president of Finance and Administration listed in this document; is there not?

A Yes.
Q Okay. And up in the upper right-hand corner we have a base and total figures given; is that right?

A Yes.
Q At least for this draft document, that is

FLORIDA PUBLIC SERVICE COMMISSION
the estimated market value of that position; is that right?

A According to this, yes.
Q And that number is derived as a weighted average of the information that is provided in the body of the document; is that right?

A Yes.
Q Okay. So for example, the highest weighted one is the second to the last row for top financial executive water utilities; do you see that? That receives a weight of three?

A Yes.
Q That is higher than the weights for any other data; is that correct?

A No. It looks like the one for general industry on the second row is higher than that number.

Q The weight for that is two, is it not?
A Yes.
Q The weight for the top financial executive of water utilities is three; is that right?

A Right.
Q The top financial executive for water utilities is higher weighted than any of the others?

A It is higher weighted yes, but not a higher

FLORIDA PUBLIC SERVICE COMMISSION
number.
Q I asked about the weighting.
A Yes, the weighting is higher.
Q Why, if you know, is the weighting higher for that than any of the others?

A Well, one would intuitively assume since we are a water utility, what other water utilities are paying would be more relevant than other types of industry.

Q So is that the reason for the high weighting for that?

A I did not assign that, and am not really very familiar -- I'm not familiar with this document. So I don't know the reason, but that would be my speculation as to why.

Q The last row is the one item that deals with Florida specific information; does it not?

A That is what it indicates, yes.
Q All right. In other words, there are six sources here; five of them are nationwide, and the last one is Florida specific, is that right?

A That is what it would show, yes.
Q The Florida specific is given the lowest weighting with two others; is it not?

A Yes.

FLORIDA PUBLIC SERVICE COMMISSION

Q Why would the Florida specific information for a VP of Finance and Administration of water utilities be given the lowest weighting?

A If you look at the survey source, it says that it was a custom, informal survey source. And I was going to tell you earlier that the reason that many companies do not like to rely on telephone data is because of the inaccuracy and inability to verify that type of information.

One must rely on persons answering the telephone and their credibility and whether they've actually looked up the information appropriately or not. So that may be one reason.

Q Would you agree with me that the Florida specific information and the salary shown there is significantly less than the overall estimated market value shown in this document?

A It looks like it is about $\$ 4,000$ lower, which would be less than 5 percent lower than the base indicated on average.

Q You've got to take me through how you see only 4,000 difference there.

A Well, it looks like 82 versus 78 to me.
Q Okay. The 78 figure that you just gave is a total figure, is it not?

A Yes.
Q I mean, there is figures for base and there is figures for total; is there not?

A Right.
Q The 78 is the total figure?
A So you are talking about the base. I see what you are saying.

COMMISSIONER GARCIA: Mr. Beck, where are you?

MR. BECK: On the last row.
CHAIRMAN CLARK: Let me just caution you.
MR. BECK: I didn't give the number.
CHAIRMAN CLARK: I know you didn't give the number. Ms. Lock, Mr. Armstrong has indicated it is the number that is a problem. One way you deal with that is to indicate the columns and the numbers. You can avoid using the number. It is tedious, but you can do it. Okay?

WITNESS LOCK: Okay.
CHAIRMAN CLARK: This isn't for our
benefit. This is because your company has said it needs to be kept confidential.

WITNESS LOCK: Okay, thank you.
BY MR. BECK :
Q You just gave us the total number. Since

FLORIDA PUBLIC SERVICE COMMISSION
it is out, I will go ahead and repeat it, 78, for the Florida specific; is that right? It is a figure of 78 for total in the Florida specific information?

A Yes.
Q Wouldn't it be correct to compare that against the amount under total in the upper right-hand corner?

A Yes.
Q Would you agree the Florida specific information is significantly less than the total for the estimated market value related to total?

A Yes. But again, one must be cautioned by the reliability of that number since it was a custom, informal study.

Q Would you agree that, in turn, if we compare the base figure for the Florida, and compare it to the base figure in the upper right-hand corner, that the Florida number is significantly less than the estimated total base.

A Yes.
Q Could you turn to the exhibit marked calculation of 1994 Executive Bonuses.

A Could I have a moment, please? (Brief pause. )

WITNESS LOCK: You are on exhibit for 1994 FLORIDA PUBLIC SERVICE COMMISSION
executive bonuses?

BY MR. BECK:
Q Yes.
A Okay.
Q There is one page attached to the cover page, is there not?

A Yes.
Q And do you have that in front of you?
A I do.
MR. BECK: And Counsel, I'm assuming that the only thing $I$ cannot discuss here are the actual numbers, that you would have no objection to describing the columns.

MR. ARMSTRONG: That's accurate.

BY MR. BECK:
Q Okay. Ms. Lock, this document describes a calculation of bonuses for 1994 for executives; is that right?

A Yes.
Q Okay. And one of the columns is estimated VGU gain, do you see that?

A Yes.
Q To what does that refer?
A That is the Venice Gardens Utility gain on sale.

FLORIDA PUBLIC SERVICE COMMISSION

Q And the next column after the estimated gain is the bonus portion. Do you see that?

A I do.

Q How was that determined?
A I would have to refresh my memory. Give me a minute and $I$ will read this over. (Brief pause.) I could probably try to wade through this, but $I$ think I would like to defer this schedule to Morris Bencini, since he was the preparer whose name appears at the bottom.

Q Okay. You think Mr. Bencini is a better witness about bonuses than you?

A Well, Mr. Bencini is the one who actually performed the calculations that you see. And I don't have the plan document in front of me which would indicate how these formulas were derived, so I would be afraid I would make an error if I were trying to do this off the top of my head.

Q Okay. Let me try a few general questions with you, if you can answer them. There is a base VGU bonus and a VGU add-on bonus, both listed there; is that right?

A Yes.
Q And those together make up the total VGU bonus; is that right?

FLORIDA PUBLIC SERVICE COMMISSION

A That's what this shows.
Q What is the difference qualitatively between the base VGU bonus and the VGU add-on bonus?

A That's what I'm saying. Without having the documents that describe the methodology, I cannot recall that.

Q Can you not just describe it in a general way what the difference is?

A I don't know. I don't have that information and $I$ didn't prepare this schedule. I would have to have that document or else defer to Mr. Bencini.

Q Do you know why bonuses were paid to executives on account of the sale of the Venice Gardens Utilities?

A Yes. Most executive incentive compensation plans are tied directly to the financial goals and attainment of the company. So gain on sell would be one of the normal financial measures that would be included in determining the overall financial performance of the company.

Q Were the executives the only persons to get a bonus relating to the Venice Garden sale or were all employees granted a bonus based on that sale?

A We did not have a program that would allow

FLORIDA PUBLIC SERVICE COMMISSION
employees to be included in gain on sale for bonus or incentive purposes.

Q So these were the only persons that are listed here, are the only persons that received bonuses on account of the sale; ; is that correct?

A Yes.
Q Could you turn to the last-document, a Southern States 1994 Incentive Compensation Plan.

A Okay.
Q Could you turn to the last page of this document?

A The last page?
Q Yes.
A I see it.
Q Okay.. There is two components, a component one and a component two to the Incentive Compensation Plan; is that right?

A Yes.
MR. BECK: And Counsel, would you have any objection to verbalizing one of the component one goals?

MR. ARMSTRONG: No. BY MR. BECK:

Q Okay. One of the component one goals in the Incentive Compensation Plan was to maintain a

FLORIDA PUBLIC SERVICE COMMISSION
uniform rate structure for $\operatorname{SSU}$; is that right?
A Yes.
Q Why is that a component of an incentive compensation plan?

A Because I think that is a very important issue relating to the company's financial success in our ability to efficiently provide customer service.

Q And to whom is this incentive compensation plan applicable?

A As you can see, the '94 incentive compensation plan would apply to those individuals listed on the earlier exhibit, which you provided.

Q It would be to them and them only?
A Yes.
MR. BECK: Thank you, Ms. Lock. That's all I have. Madam Chairman, I'm not sure how you want us -- do you want us to gather up these exhibits or keep them?

CHAIRMAN CLARK: That's what usually happens except the other -- the one confidential exhibit the clerk has remains with the clerk and she knows to keep them confidential.

MR. ARMSTRONG: I can keep one, too, right?

CHAIRMAN CLARK: Well, yes. You may,

FLORIDA PUBLIC SERVICE COMMISSION
except you need to let Mr. Beck know that so we has the right count on those exhibits.

MR. ARMSTRONG: Mr. Beck, I will keep it, please. Thank you.

CHAIRMAN CLARK: All right. I assume because Mr. Twomey is not in here he has no questions for this witness.

MR. BECK: I do not know the answer to that.

CHAIRMAN CLARK: Staff, go ahead.
MS. O'SULLIVAN: The Staff has no questions.

CHAIRMAN CLARK: Well, Commissioners, do you have questions? Redirect.

MR. ARMSTRONG: Thank you, Madam Chairman. REDIRECT EXAMINATION

BY MR. ARMSTRONG:
Q Ms. Lock, regarding one of the confidential exhibits, there was reference to the column that referred to a custom informal analysis, Florida utilities, for the VP position; do you recall that?

A Yes, I do.
Q Is Southern States the largest water utility in the state of Florida?

A Yes, we are. In fact, SSU is the largest

FLORIDA PUBLIC SERVICE COMMISSION
investor-owned.
Q Would you have any idea about what the next largest facility is, how much bigger Southern states is than the next largest facility?

A I couldn't give you a specific number, but I know that the other utilities are so much smaller that they do not even employ, for example, rate position in-house, and that we have a great deal of difficulty gathering data from them for that reason. The number of employees is much smaller, and the types of employees they have on staff is much smaller and different.

Q If you know, would the vast majority of the Florida utilities even have a VP of Finance?

A I would sincerely doubt it.
Q Would those facts that we just discussed have any influence on the weight being given to that kind of information?

A Yes, they would; because if they were not able to find other investor-owned utilities of the same sizes as $S S U$, or who employ the same types of positions, then there would not be comparable salary data for that position available.

Q Now, it is it your testimony the data provided here is data that has been -- is MP data,

FLORIDA PUBLIC SERVICE COMMISSION

Minnesota Power data?

A I do not know where this data came from.
Q Okay. And by that statement it is not your data?

A That's correct.

Q You didn't do the informal survey?
A No, we did not. In fact, I was shocked to see this data.

Q During your deposition do you recall questions regarding executive pay surveys conducted by Hewitt?

MR. BECK: Objection. Asking about "during your deposition do you recall" is not going over the questions I asked. It is beyond the scope of the cross examination.

MR. ARMSTRONG: There was some question back and forth regarding whether or not information was requested. I know that was the subject of deposition.

CHAIRMAN CLARK: I will allow the question. I think he is pursuing the concern about information being provided on executive sales.

WITNESS LOCK: I do recall some questions regarding executive pay. And I believe at that time I had also indicated to Ms. O'Sullivan that the
executive pay was handled by Minnesota Power and not by Southern States, and we did not have a lot of information other than some general information that came through the comp committee of the Board of Directors.

BY MR. ARMSTRONG:
Q If you would look at that deposition transcript, you wouldn't see anybody from the office of Public Counsel listed, would you? Page two of the deposition.

A No, there isn't. It was only the Public Service Commission Staff.

Q You attempted several times, and I'm going to give you the opportunity now, to describe in some summary fashion if you could the customized survey performed in this instance, and how it relates to your experience regarding customized surveys of this type.

A Yes. Hewitt Associates, first of all, is probably one of the largest professional human resources consulting firms in the world. They used the same methodology in terms of collecting data from the company, job descriptions, of all the positions that we have. From a complete list of all the job descriptions we have in the company, they were able
to narrow it down to 50 jobs which represented a benchmark sample of all of our jobs.

They then went about the process of gathering other competitive data. They looked at 18 different sources of data, not only the florida League of Cities, but a number of different sources from the Bureau of Labor Statistics to other professional surveys and were able to look at a number of different sources of information and come up with average rates of pay for each of the 50 positions that we employ.

They then looked at the actual average pay that we pay for each of our employees in those job classifications, an Operator I, Operator II, Operator III, Maintenance Tech, and see how far our actual rates of pay differed from the average. The average, of course, is not the top paying level. It is not the lowest paying level.

Obviously, most companies wouldn't want to be the lowest payers in the State of Florida. So what we endeavored to do is at least reach the average level. In a lot of those survey sources that were shown, there are companies that pay a lot more, but then there are companies that might pay 40 or 50 percent within a range.

So by averaging the lowest payers with the highest payers you do come up with an average that should be reflective of the overall market level for that position. And what we found was that for all of those 50 positions that our actual pay averaged about 17 percent below the average amount.

And we did look at, as $I$ say, 50 different actual positions that we employ, and had numerous surveys that were differentially weighted based on whether they were representative of our types of positions.
(This concludes Volume 19.)
(Transcript continues in sequence in Volume

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Actuarial Report as of January 1, 1994 for the Postretirement Medical, Dental, and Death Benefit Programs of Southern States Utilities


## Godmins Booke \& Dickenson

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December 21, 1994

Ms. Dale G. Lock
Human Resources Administrator
Southern States Utilities
1000 Color Place
Apopka, FL 32703
Dear Dale:
We respectfully present in this report the results of our actuarial valuation of the Company's postretirement medical, dental, and death benefit programs. This report's principal purpose is to provide information regarding:
the financial statement implications of applying FASB Statement No. 106 in 1994,
the deductible limit for funding your 501(c)(9) trust,
the projected FAS Expense for 1995, and
a comparison of actual and expected plan experience.
It is important to note that the Company's true liability for postretirement medical, dental, and death benefits depends greatly upon future experience and is very difficult to predict accurately. For example, the Company's liability for postretirement medical care benefits depends greatly upon factors such as future medical inflation, actual incidence of claims and the retirement and termination patterns of participants. Due to the uncertainty of these events, Part II of this report analyzes the sensitivity of the results to variations in future plan experience.

For your convenience, we have summarized the highlights and essential results of the valuation in the Summary of Results found in Part I. The Table of Contents following this letter outlines the text and tables included in this report.

Respectfully submitted,
Godwins Booke \& Dickenson
Boinn Bamu_

Brian S. Broverman, F.S.A. Principal
cc: Dwight S. Bell
Godwins Booke \& Dickenson
$\qquad$

Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs

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$\qquad$ OF $\qquad$

Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs

## Part I. Summary of Results

A. Financial Information

$$
01 / 01 / 94
$$

01/01/93

1. FAS 106 Expense
a. Medical and Dental
b. Death Benefits
c. Total

2. Succeeding Year Cash Flow Projection
a. Medical and Dental
b. Death Benefits
c. Total

3. Accumulated Postretirement Benefit Obligation
a. Medical and Dental
b. Death Benefits
c. Total

4. Expected Postretirement Benefit Obligation
a. Medical and Dental
b. Death Benefits
c. Total
$\begin{array}{r}\$ \quad 6,559,374 \\ \hline 6,852,128\end{array}$

| $\$$ | $7,087,009$ |
| ---: | ---: |
| 209,133 |  |

5. Plan Assets
a. Total

6. Balance Sheet Asset (Liability) Medical + Dental + Death
a. Beginning of Year
b. Net Employer Contributions in Year
c. (Financial Statement Expense for Year)
\$ $(400,633) \quad \$ \quad 0$
d. End of Year

$$
([\mathrm{a}]+[\mathrm{b}]+[\mathrm{c}])
$$

7. Assumed Discount Rate
7.0\%
7.0\%


Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs
B. Valuation Data
01/01/94 01/01/93

1. Number of Participants - Medical and Dental
a. Active
451
421
b. Retired
c. Total
2. Number of Participants - Death Benefits
a. Active

451
421
b. Retired

16
14
c. Total

467
435

01/01/95

1. FAS 106 Expense
\$ 898,156
2. Accumulated Postretirement Benefit Obligation
3. Expected Postretirement Benefit Obligation

## EXHIBIT <br> 



Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs
D. Deductible Limit for Funding 501(c)(9) Trust

Year Beginning 01/01/94

1. Current Service Cost
\$ 230,658
2. Interest Cost
\$ 138,605
3. Expected Return on Assets
$(25,002)$
4. Amortization

152,781
\$ 497,042


## Part II. Actuarial Commentary

## A. Sensitivity Analysis

The Company's true liability for postretirement benefits depends greatly upon future economic and demographic factors which are difficult to predict accurately. The estimates in this report are based on the actuarial assumptions that are outlined in Part V. These assumptions are hereafter referred to as the current assumptions. Different assumptions could yield significantly different results. The following table illustrates the sensitivity of the results to changes in the key assumptions.


As shown above, the postretirement medical and dental results are very sensitive to changes in assumptions. We believe that there are many different sets of reasonable assumptions. However, we also believe that a reasonable range of results exists. For example, we think a reasonable estimate of the 1994 FAS 106 expense for postretirement medical and dental benefits may be from $\$ 500,000$ to $\$ 900,000$.

## B. Beginning Medical and Dental Claim Level

The beginning medical and dental claim level is a major determinant of the FAS 106 annual expense for post retirement medical and dental benefits.

The beginning claim level that is used for this report is based on a combination of actual claim data for the period 1/1/93-9/30/94 for active employees and retirees and manual rates which represent the expected claims based beneffts, demographics, and geographic cost factors. Overall, medical claims were $7 \%$ less than the manual rates so we used manual rates less $7 \%$ for retirees under 65 and over 65. The beginning dental claim level is based on the overall actual dental claims experience for actives and retirees combined.

## C. Medical Trend Rate

The medical trend rate is an important assumption in projecting medical claim levels. Varying this assumption produces dramatically different results for liabilities and expense amounts as shown in [A] above. The calculations in this report are based on an assumed annual medical trend rate of $10 \%$ beginning in 1994 grading down to an ultimate rate of $5 \%$ in 1999. This implicitly assumes that medical costs will increase as a percent of GDP from $14.6 \%$ in 1993 to 17.2\% in the year 1999 and that they will remain constant thereafter.

## D. Gain and Loss Recognition

FAS 106 specifies a corridor approach as the minimum for recognizing gains and losses. Under this approach, cumulative gains and losses are not recognized until they exceed $10 \%$ of the APBO (or market-related value of plan assets if greater). Once the cumulative gain or loss exceeds this threshold, the excess is amortized over the average future service to expected retirement of active plan participants.

Any systematic approach to recognizing gains and losses can be used instead of the minimum method if the alternative method satisfies the following conditions:

1. The minimum amortization is recognized in any period in which it is greater than the amount that would be recognized under the alternative method,
2. the method is applied consistently from year to year and on a similar basis for gains and losses, and
3. the method is disclosed.

## E. Changes in Assumptions

The medical and dental trend rates were reduced by $1 \%$ for 1994 from the amounts used in the previous valuation. Ultimate trend rates remain unchanged.

## Southern States Utilities

 Postretirement Medical, Dental, and Death Benefit Programs
## Part III. Actuarial Certification

We have made an actuarial valuation of the Company's postretirement medical and dental benefit programs as of January 1, 1994. The employee data and the financial and claims information that were used in this valuation were submitted to us by the plan sponsor, or at the plan sponsor's direction. The demographic data was collected as of the valuation date. We did not audit any of the submitted data. On the basis of our review of the data, however, we believe that the information is sufficiently complete and reliable for the purposes of this valuation.

In our opinion, the assumptions and methodology underlying this valuation are consistent with the criteria outlined under FAS No. 106 and conform to the Actuarial Standard of Practice No. 6, Measuring and Allocating Actuarial Present Values of Retiree Health Care and Death Benefits and Actuarial Compliance Guideline No. 3, published by the Actuarial Standards Board.

We have no relationship with the client which may impair or appear to impair the objectivity of our work.
Godwin Soke \& Dickenson


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(813) 573-2884

## Part IV. Review of Regulatory Issues and Other Responsibilities

## A. Regulatory Issues

1. Document and SPD

The document and SPD should accurately reflect the retiree benefit plan and should unambiguously reserve the employer's right to modify or terminate the plan.

A recent ruling in the 3rd Circuit (PA, NJ, DE) prohibited an employer from modifying its postretirement benefits, even though the employer had clearly reserved the right to do so. The ruling was based on the fact that the plan document did not have the appropriate language regarding amendment procedures and did not identify the person who had the authority to amend the plan. The court did not allow the employer to terminate plan benefits until it adopted a proper amendment procedure.
2. FAS 112

FAS 112, which is effective for fiscal years beginning after $12 / 15 / 93$, requires employers to show a liability for benefits provided to nonactive employees who are not retired. This includes employees who are terminated, laid off, disabled, on leave of absence, as well as surviving spouses and dependents.

Employers who provide benefits to long term disabled employees may have a choice to classify these benefits as postretirement benefits subject to FAS 106, or postemployment benefits subject to FAS 112. FAS 106 allows amortization of the transition obligation and includes a provision for delayed recognition of gains and losses.
3. Medicare Primary for Disabled, Non-working Employees

Effective August 10, 1993, Medicare is the primary payor on benefits for most disabled, nonworking, employees who are covered under Medicare because of disability. Under a recently issued procedure, employers can have Medicare adjust payments so the employer plan pays secondary, effective August 10, 1993.
4. Other Health Care Issues not Directly Related to Postretirement Benefits

- Coverage under Qualified Medical Child Support Orders
- Mandated coverage of pre-adoptive children
- Pediatric vaccines vested as of May 1, 1993
- Medicaid's ability to use COBRA or forced enrollment to cost shift to employers
- Self-funded must pay New York hospital surcharge or face stiff penalties
- Family and Medical Leave Act
- No required COBRA coverage for employees on Medicare because of kidney disease


## Southern States Utilities

 Postretirement Medical, Dental, and Death Benefit Programs
## B. Other Responsibilities

1. Disclosure information required by FAS 106 must be included in year-end financial statements.
2. FAS expense must be calculated on an estimated and ultimately a final basis for accruing cost throughout the year.
3. Retiree contribution rates should be updated to meet the intent of the postretirement plan.
4. Plan Administrator must provide the following:
a. For completion of the actuarial valuation report
i. Active and retiree census data
ii. Experience data on active and retiree plans
iii. Expense data
iv. Descriptions of plan changes
b. For completion of fiscal year end disclosure information
i. Descriptions of plan changes or significant events during the fiscal year
ii. Retiree contributions paid to employer for medical and death benefit coverages
iii. Employer cash payments for retiree medical and death benefits for the fiscal year

- If self-insured or participating insurance contract, cash payments should equal retiree claims plus applicable administrative expenses, stop loss insurance premiums, and other expenses related to the plan.
- If insured on a pooled basis, cash payments should equal age-adjusted premiums.
iv. Trust deposits and asset value at year-end.

Postretirement Medical, Dental, and Death Benefit Programs

## Part V. Valuation Methods and Assumptions

## A. Valuation Methods

The Projected Unit Credit method is used to calculate all of the expense amounts that are included in this report. The calculations are performed in accordance with the methodology set forth in FASB Statement No. 106, Employers' Accounting for Postretirement Benefits Other Than Pensions.
Generally, the method is intended to match revenues with expenses and attributes an equal amount of an employee's projected benefit to each year from date of plan entry to the date that he is first eligible to retire with full benefits.

All of the calculations in this report assume that the plan will continue without change except that retiree cost-sharing provisions, including contributions, will increase over time at the same rate as the total plan cost. This assumption does not necessarily imply that there is an obligation to do so.
B. Valuation of Assets

A 501 (c)(a) trust has been established effective December 30, 1993. Assets held in the trust fund are valued on a market value basis.
C. Employees Included in the Calculations

All active employees who have met the plan's participation requirements as of the valuation date are included in the calculations. Former employees or their survivors who are entitled to a benefit under the provisions of the plan are also included.

## D. Actuarial Assumptions



## Southern States Utilities-

 Postretirement Medical, Dental, and Death Benefit Programs4. Beginning Medical and Dental Claim Level
Per Person (used for the twelve
month period beginning on the
valuation date)
5. Mortality
6. Disability
7. Sample Termination Rates
8. Retirement Rates
9. Percentage of Future Retirees Who Elect

| Retiree or <br> Spouse Age | Annual Cost |  |
| :---: | ---: | ---: |
| Medical | Dental |  |
| 57 | $\$ 3,305$ | $\$ 106$ |
| 62 | 4,034 | 106 |
| 67 | 998 | 106 |
| 72 | 1,154 | 106 |
| 77 | 1,338 | 106 |
| 82 | 1,422 | 106 |
| 87 | 1,455 | 106 |

1983 Group Annuity Mortality Table for males, set back six years for females

None

| Age | Annual <br> Rate |
| :---: | ---: |
|  |  |
| 25 | $11.63 \%$ |
| 30 | $10.89 \%$ |
| 35 | $10.14 \%$ |
| 40 | $9.40 \%$ |
| 45 | $6.87 \%$ |
| 50 | $4.33 \%$ |
| 55 | $1.80 \%$ |
|  |  |
|  | Annual |
| Age | Rate |
|  |  |
| $55-59$ | $2 \%$ |
| $60-61$ | $10 \%$ |
| 62 | $30 \%$ |
| $63-64$ | $20 \%$ |
| 65 | $100 \%$ |

Postretirement Health Care Coverage
10. Percentage of Future Retirees with Postretirement Health Care Coverage Who Elect Family Coverage
a. Male Retirees
85\%
b. Female Retirees
85\%
11. Expenses
$5 \%$ Included in beginning claim level
12. Assumed rate of annual compensation increase

Not applicable
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## Southern States Utilities <br> Postretirement Medical, Dental, and Death Benefit Programs

13. Expected net after tax retum on assets $5 \%$

## E. Other Considerations

1. There are no significant liabilities for this plan other than for benefits.
2. Although we believe these to be accurate and complete as of the valuation date, employee data supplied to us by the Employer has not been audited by us.
3. All employees who are assumed to be married and for whom we have no spouse information are assumed to have a spouse with the husband three years older than the wife.


## Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs

## Part VI. FASB Statement 106 Information'

The substantive plan which is the basis for this accounting is the plan described in Part VII together with the following assumptions about future modifications.

1. Retiree cost-sharing provisions (deductible, coinsurance, etc.) will increase over time at the same rate as the total cost of the plan.
2. Retiree contributions will increase at the same rate as the total cost of the plan.
A. Net Periodic Postretirement Benefit Cost
3. Service cost
\$ 406,205
283,026
$(\$ 25,002)$

210,344

0
$(26,541)$
$\$ 848,032$
\$ 973,133

[^0]$\qquad$

## Southern States Utilities

Postretirement Medical, Dental, and Death Benefit Programs

## B. Reconciliation of Funded Status

1. Fair value of assets
2. Accumulated postretirement benefit obligation
a. Retirees and beneficiaries eligible for benefits
b. Active employees fully eligible for benefits
c. Terminated employees fully eligible for benefits
d. Active employees, not fully eligible for benefits
e. Total
3. Funded Status ([1] - [2])
4. Unrecognized transition obligation (asset)
5. Unrecognized prior service cost
6. Unrecognized net (gain) or loss
7. Balance sheet asset (liability)

$$
([3]+[4]+[5]+[6])
$$

01/01/94
\$ $500,040 \quad \$ \quad 0$
\$ 536,229
\$ 1,613,307
0
0 - 0
1.933.996 $\quad 0$
4.083.532 \$ 4.206.870
\$ $(3,583,492) \$ 4,206,870$

3,996,526
4,206,870
0
(813,667)
0
\$ $(400,633) \quad \$ \quad 0$

## Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs

## C. Other Accounting Information

1. Market related value of assets
2. Unrecognized net (gain) or loss to amortize ${ }^{3}$

01/01/94
01/01/93
\$ 1,704,560
\$
0
3. Average future service (in years)
a. To expected retirement
15.27
15
b. To full eligibility
8.63
10
4. Medical Trend Rate

| a. First year rate | $10 \%$ | $12 \%$ |
| :--- | :--- | ---: | ---: |
| b. Ultimate rate | $5 \%$ | $5 \%$ |
| c. Select period | 5 years | 7 years |

5. Dental Trend Rate

| a. First year rate | $7 \%$ | $8.5 \%$ |
| :--- | ---: | ---: |
| b. Ultimate rate | $5 \%$ | $5 \%$ |
| c. Select Period | 4 years | 7 years |

6. General Inflation
$4 \%$
$4 \%$
7. Weighted average assumed discount rate
7.0\%
$7.0 \%$
8. Assumed rate of annual compensation increases

N/A N/A
9. Weighted average expected long-term rate of retum on plan assets (after-tax)

NA N/A
10. Estimated income tax rate included in rate of return

N/A
NA
11. Effect of a $1 \%$ increase in assumed trend rate on postretirement medical and dental care:
a. Service and interest cost
$+21 \%$
$+21 \%$
b. APBO
$+18 \%$
N/A to (i) the excess, if any, of the absolute value of the amount in line (C)(2) over $10 \%$ of the greater of the amounts in lines $(B)(2)(0)$ and $(C)(1)$, divided by (ii) the number of years in line (C)(3)(a).

## Southern States Utilities <br> Postretirement Medical, Dental, and Death Benefit Programs

12. Amount of benefits of employees and retirees covered by insurance contracts issued by the Employer and related parties

None
None
13. Amortization methods and periods used to amortize:
a Transition obligation
b. Prior service cost
c. Net (gain) or loss
14. Employer commitments to make future plan amendments (that serve as the basis for the Employer's accounting for the plan)

| Straight Line | Straight Line |
| :--- | :--- |
| 20 years from | 20 years from |
| $1 / 1 / 93$ | $1 / 1 / 93$ |

NRA NRA
Minimum Method Minimum Method described in FAS 106 n None . None

## 0

## Part VII. Summary of Current Plan Provisions

## A. Postretirement Medical and Dental Benefits

1. Eligibility

Employees who retire at age 55 or later with 5 or more years of service are eligible to receive posiretirement medical benefits.
2. Benefits Covered

Eligible retirees are covered by a comprehensive medical plan with a $\$ 200$ deductible and a cap on out-of-pocket cost when claims paid reach $\$ 5,000$. Benefits are generally paid at $90 \%$ for network providers and $70 \%$ for non-network providers.

Dental benefits have a $\$ 100$ deductible, waived for preventive treatment. Coinsurance is $100 \%$ for preventive, $80 \%$ for basic, and $50 \%$ for major services. Maximum annual benefit is $\$ 1,500$.
3. Coordination with Medicare

The benefits under this plan are coordinated with Medicare for retirees and spouses age 65 or older on a "Carve-out" basis. That is, employer payments will equal the payment amount calculated in the absence of Medicare minus the amount paid by Medicare.
4. Surviving Spouses

Surviving spouse may continue in the plan for 90 days by paying the full cost, then they are offered COBRA contribution coverage.
5. Retiree Contributions

Annual Contribution for 1995

|  | Annual Contribution for 1995 |  |  |  |
| :--- | :---: | :---: | :---: | :---: |
|  |  | Retiree Only | Retiree and Spouse |  |
|  |  |  |  |  |
| Medical | $\$$ | 263 | $\$$ | 974 |
| Dental | $\$$ | 27 | $\$$ | 54 |



## Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs

## B. Postretirement Death Benefits

1. Eligibility

Same as medical and dental.
2. Benefits Provided

Eligible retirees are provided with a death benefit of $\$ 10,000$.
3. Retiree Contributions

Annual retiree contribution is $\$ 10$.

## Southern States Utilities

## Postretirement Medical, Dental, and Death Benefit Programs

## Part VIII. Demographic Information

A. Number of Participants and Dependents
01/01/94 ..... 01/01/93

1. Number of Active Employees Submitted ..... 435 ..... 421
2. Number of Costed Participants and Dependents
a. Active employees
(1) Fully eligible ..... 44

- (2) Not fully eligible ..... 391
(3) Total active employees ..... 435 ..... 421
b. Retirees and beneficiaries eligible for benefits ..... 16 ..... 14
c. Total costed participants ..... 451 ..... 435


## Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs

## B. Age/Service Distribution - Actives



Southern States Utilities
Postretirement Medical, Dental, and Death Benefit Programs

## C. Summary Statistics

1. As of January 1, 1994


## PAGE

$\qquad$ OF $\qquad$
Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs
D. Age Distribution - Retirees

| Ags | Thale |  | Femals |  | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Manisel? Fanily |  | Marled Fandily | 5ingle | Matyed! fanily | SHIS! |
|  | 0 | 0 | 0 | 0 | 0 | 0 |
| 55.5\% | 2 | 0 | 1 | 3 | 3 | 3 |
|  | 4 | 2 | 0 | 1 | 4 | 3 |
| \% 65 \% 50 | 1 | 0 | 0 | 0 | 1 | 3 |
|  | 1 | 0 | 1 | 0 | 2 | 0 |
|  | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 8 | 2 | 2 | 4 | 10 | 6 |

$\qquad$

## Southern States Utilities

Postretirement Medical, Dental, and Death Benefit Programs

## Part IX. Appendices

## A. Gain/Loss Calculation

1. Expected APBO as of $12 / 31 / 93$
a. APBO as of 01/01/93
$\$ 4,206,870$
470,846
291,943
$(72,500)$
e. Effect of plan changes as of 12/31/93
f. Expected APBO as of 12/31/93 (la] + [b] + [c] + [d] + [e])
2. Actual APBO as of $12 / 31 / 93$
3. Net liability (gain) or loss for 1993 ([2] - [1f])
4. Net (gain) or loss for 1993 on the market related value of assets
5. Unrecognized (gain) or loss as of 01/01/93
6. Amortization of (gain) or loss in 1993
7. Unrecognized (gain) or loss as of 12/31/93 ([3] + [4] + [5]-[6])
8. $10 \%$ of APBO (or market related value of assets, if greater) as of 12/31/93
9. (Gain)/loss in excess of comidor
10.Average remaining service period
11.Minimum required amortization ([9] $+[10]$ )
$\$ 408,353$
\$ 405,274 15.27

0
\$ 4,897,159
$\$ 4,083,532$
$\$ \quad(813,627)$
\$
(40)

0
0
$(813,667)$
$(26,541)$

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Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs
B. Cash Flow Projections

$\qquad$

# Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs 

## C. Funding Calculation

1. Assumption differences from FAS 106
a. No future medical or dental trend
b. Discount rate based is after-tax and assumed to be $5 \%$.
c. APBO determined as of January 1,1993 is amortized over 15 years, the future working lifetime of active employees.
$\qquad$ Southern States Utilities
Postretirement Medical, Dental, and Death Benefit Programs

## D. Detail Results by Benefit

| 1994 | Medical | Dental | Life | Total |
| :--- | :--- | :--- | :--- | :--- |
| EPBO | $\$ 6,183,244$ | $\$ 376,130$ | $\$ 292,754$ | $\$ 6,852,128$ |
| APBO | $\$ 3,638,014$ | $\$ 225,724$ | $\$ 219,794$ | $\$ 4,083,532$ |
| Service Cost | $\$ 370,428$ | $\$ 22,146$ | $\$ 13,631$ | $\$ 406,205$ |
| Interest Cost | $\$ 252,062$ | $\$ 15,702$ | $\$ 15,262$ | $\$ 283,026$ |
| Expected Return on <br> Assets | $(\$ 22,274)$ | $(\$ 1,382)$ | $(\$ 1,346)$ | $(\$ 25,002)$ |
| Amortization of <br> Gair/Loss | $(\$ 23,645)$ | $(\$ 1,467)$ | $(\$ 1,429)$ | $(\$ 26,541)$ |
| Amortization of <br> Transition Obligation | $\$ 195,144$ | $\$ 7,766$ | $\$ 7,434$ | $\$ 210,344$ |
| FAS 106 Expense | $\$ 771,715$ | $\$ 42,765$ | $\$ 33,552$ | $\$ 848,032$ |


| 1993 | Medical | Dental | Life | Total |
| :--- | :--- | :--- | :--- | :--- |
| EPBO | $\$ 6,820,449$ | $\$ 266,560$ | $\$ 209,133$ | $\$ 7,296,142$ |
| APBO | $\$ 3,902,865$ | $\$ 155,317$ | $\$ 148,688$ | $\$ 4,206,870$ |
| Service Cost | $\$ 440,172$ | $\$ 17,004$ | $\$ 13,670$ | $\$ 470,846$ |
| Interest Cost | $\$ 270,846$ | $\$ 10,778$ | $\$ 10,319$ | $\$ 291,943$ |
| Expected Return on <br> Assets | $\$ 0$ | $\$ 0$ | $\$ 0$ | $\$ 0$ |
| Amortization of <br> Gain/Loss | $\$ 0$ | $\$ 0$ | $\$ 0$ | $\$ 0$ |
| Amortization of <br> Transition Obligation | $\$ 195,144$ | $\$ 7,766$ | $\$ 7,434$ | $\$ 210,344$ |
| FAS 106 Expense | $\$ 906,162$ | $\$ 35,548$ | $\$ 31,423$ | $\$ 973,133$ |

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# Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs 

## E. Glossary of Postretirement Welfare Benefit Terms

This Glossary contains definitions and examples of a number of terms frequently used when discussing postretirement welfare benefits. It is intended to assist people currently unfamiliar with FAS 106 accounting rules and does not represent a complete or exhaustive description of the topic.

Expected Postretirement Benefit Obligation (EPBO)
The actuarial present value as of the valuation date of the net postretirement benefits expected to be paid to all current plan participants, including both active and retired employees. It equals the present value of future benefits minus the present value of future retiree contributions.

## Actuarial Present Value

The value of a series of expected future payments, projected based on a number of actuarial assumptions, and discounted back to the valuation date.

Example: A $\$ 100$ payment which has a $25 \%$ chance of occurring one year from now would have an actuarial present value of $(\$ 100)(.25)+1.08=\$ 23.15$, assuming an $8 \%$ discount rate.

## Accumulated Postretirement Benefit Obligation

The portion of the EPBO that is attributable to employee service prior to the valuation date. For active employees who have reached full eligibility and retirees, the APBO equals the EPBO.

## Attribution

The process of assigning postretirement benefits to years to service. For most plans, FASB requires postretirement benefits to be attributed to years of service from date of hire to full eligibility date on a pro rata basis.

Example: The attribution period for an employee age 40 who was hired at age 35 and will reach full eligibility at age 55 is 20 years (55-35). If the Total Plan Liability equals $\$ 20,000$ for this employee, then the Accrued Liability is $5 / 20 \times \$ 20,000=\$ 5,000$.

## Current Service Cost

The portion of the EPBO attributable to the current year of service. Current Service Cost is one component of FASB Expense. Employees who have reached full eligibility and retirees have no current service cost.

Example: For the employee mentioned above, the Current Service Cost is $(1 / 20) \times(\$ 20,000)=\$ 1,000$.

## Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs

## Full Eligibility

The point in time when an employee has met all of the age and service requirements to qualify for full benefits from the plan.

Example: Plan A requires 10 years of service and attainment of age 55 to qualify for postretirement benefits. Full eligibility would be as follows:

1. Employee Age 40 with 10 years of service

Full Eligibility
2. Employee Age 52 with 5 years of service

Age 55
Age 57

Example: Plan $B$ is the same as Plan $A$ but requires contributions from anyone retiring with less than 30 years of service. Full eligibility would be:

1. Employee Age 40 with 10 years of service

Full Eligibility
2. Employee Age 52 with 5 years of service

Age 60
Age 65
(expected retirement age)

## Funded Status

The excess of the Plan Assets over the APBO.

## Plan Assets

Assets that have been segregated and restricted (usually in a trust) to provide for postretirement benefits.

## Actual Return on Plan Assets

A component of FASB Expense for funded plans equal to the increase in value of Plan Assets over the accounting period, adjusted for contributions and payments.

Interest Cost
A component of FASB Expense which equals the discount rate times the APBO adjusted for cash flow.
Transition Asset (Obligation)
The funded status of the plan as of the date the FAS 106 accounting rules are adopted.

# EXHIBIT 


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# Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs 

## Amortization of Transition Asset (Obligation)

A level amortization of the Transition Asset (Obligation) over the average future working lifetime of current employees. If the average working lifetime is less than 20 years, then a 20 -year amortization may be used. Amortization of Transition Asset (Obligation) is a component of FASB Expense.

Example: An employer adopts the new FASB accounting rules 01/01/93 and has a Transition Obligation of $\$ 44$ million at that date. Average future working lifetime of current employees is 22 years. The Transition Obligation is $\$ 44$ million and the amortization is $\$ 2$ million per year from 1993 through 2014.

## Amortization of Gains and Losses

Gains and losses arise when actual experience differs from the actuarial assumptions used to calculate the EPBO. Net gains or losses are generally only recognized if they exceed $10 \%$ of the APBO (or the market related value of plan assets, if greater). Once they do, they are amortized over the average future working lifetime of current employees.

## FAS 106 Expense

The expense accrual for postretirement benefits required by FASB, generally effective in 1993. The components of the FAS 106 Expense generally include:

Current Service Cost<br>Interest Cost<br>Amortization of Transition Obligation<br>Actual Return on Plan Assets<br>Amortization of Gains or Losses

FAS 106 refers to this amount as the Net Periodic Postretirement Benefit Cost.
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Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs

## F. Retiree Health/Life Accounting Example-Amortization of Transitional Liability (FAS 106)

Assumptions:
Actuarial Expense - Service Cost

- Interest
- Amortization of Transitional Liability

2,000,000
$\$ 10,000,000$

Transitional Liability $=\$ 40,000,000$
Employer adopts FAS 106 for first time this year.
Employer cash payments for retiree health/life $=\$ 1,500,000$
Retiree contributions (paid to employer) for retiree healthlife $=\$ 500,000$

## Accounting Entries:

Step 1 - Enter actuarial expense of $\$ 10,000,000$
Step 2 - Enter employer cash payments for retiree healthlife benefit of $\$ 1,500,000$ (entered throughout year when paid)
A. If self-insured or participating insurance contract, cash payments should equal retiree claims plus applicable administrative expenses and stop loss insurance payments.
B. If insured on a pooled basis, cash payments should equal age-adjusted premiums.

Step 3 - Enter retiree contributions of $\$ 500,000$ as contributions are received


## Southern States Utilities Postretirement Medical, Dental, and Death Benefit Programs

## G. Retiree Health/Life Accounting Example-Immediate Expensing of Transitional Liability (FAS 106)

## Assumptions:

| Actuarial Expense | - Service Cost | $\$ 3,000,000$ |
| :--- | :--- | ---: |
|  | - Interest | $\frac{5,000,000}{}$ |
|  | $\$ 8,000,000$ |  |

Transitional Liability $=\$ 40,000,000$
Employer adopts FAS 106 for first time this year.
Employer cash payments for retiree health/life $=\$ 1,000,000$
Retiree contributions (paid to employer) for retiree healthlife $=\$ 500,000$

## Accounting Entries:

Step 1 - Enter transitional liability/expense of $\$ 40,000,000$.
Step 2 - Enter normal actuarial expense of $\$ 8,000,000$ (no expense for amortizing transitional obligation).
Step 3 - Enter employer cash payments for retiree health/life benefit of $\$ 1,500,000$.
Step 4 - Enter retiree contributions of $\$ 500,000$ as contributions are received.

| Transitional Retiree Expense |  | Normal Retiree Expense | Retiree Liability |  | Cash |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| (1) \$40,000,000 |  |  |  | (1) $\$ 40,000,000$ |  |  |
|  |  | (2) $\$ 8,000,000$ |  | (2) $\$ 8,000,000$ |  |  |
|  |  |  | (3) $\$ 1,500,000$ |  |  | (3) $\$ 1,500,000$ |
|  |  |  |  | (4) $\$ 500,000$ | (4) $\$ 500,000$ |  |

## End of Year Balances:

Transitional Retiree Expense $=\$ 40,000,000$ (shown after Net Income on Income Statement)
Normal Retiree Expense $=\$ 8,000,000$
Liability $=\$ 47,000,000$ (may cause problems with bank loan covenants).


## MEDICAL PLAN COST CONTAINMENT MEASURES

Highlights of Medical Plan cost savings measures in the plan years 1992, 1993, 1994 and 1995 are outlined below:

## January 1, 1992 Plan Year

A number of plan design and coverage changes were implemented in 1992 to offset the trend of escalating medical inflation. Some of the most significant changes are listed as follows:

1. Employee Deductibles were increased from $\$ 100 / \$ 300$ to $\$ 200 / \$ 600$ with no 4 th quarter carry-over allowed.
2. Co-insurance, was not allowed to be carried over from the 4th quarter to the next calendar year.
3. Dental Deductibles were increased from $\$ 50 / \$ 100$ to $\$ 100 / \$ 300$.
4. The waiting period for new employee participation in the medical insurance plan was increased from 30 days to 90 . Also, a six month waiting period was introduced for receiving basic and major dental treatment pre-existing conditions clause changed from 3 months to 6 months.

## January 1, 1993 Plan Year

SSU's medical plan claims experience and total costs as of year end 1992 had decreased by $10.5 \%$ from 1991 total year costs. As a result, in 1993 the employee premiums were unchanged from 1992 levels.

Further cost containment measures were undertaken in the plan design and medical coverages in 1993 as follows:

1. The amount of benefits immediately payable for pre-existing conditions was decreased from $\$ 1,500$ in the first year of coverage to $\$ 0$.
2. Benefits payable for mental/nervous disorders and substance abuse were decreased from $\$ 10,000$ per calendar year $/ \$ 25,000$ lifetime to $\$ 2,500$ calendar year $/ \$ 5,000$ lifetime. Plan participants were required to be referred for in- or out-patient treatment by an Employee Assistance Program gatekeeper in order to receive any paid medical benefits.

# EXHIBIT 


3. Supplemental accidental death benefit of $\$ 750$ was eliminated.
4. Pre-certification penalty for failure to obtain advance authorization prior to hospitalization and/or surgery was increased from $\$ 250$ to $\$ 750$.

## January 1, 1994 Plan Year

For the year 1993, medical costs had increased by only $2.2 \%$ over 1992 levels. In 1994, SSU did not effect changes in plan design and coverages, but instead took steps to improve life insurance benefits which at $.3 \%$ of payroll were substantially below the $.5 \%$ of payroll level provided on average by employers reported in the U.S. Chamber of Commerce Employee Benefits Survey of 1992 data. Life insurance was increased from a flat $\$ 20,000$ of term life for all employees regardless of level, to one time annual salary up to $\$ 100,000$. Additionally, survivor income benefits were introduced.

## January 1, 1995 Plan Year

Effective January 1, 1995, SSU converted to a more economical self funded plan with stop-loss insurance and plan claims administrative services provided by Great West Health and Life Insurance Company. Were SSU not a large company, it would not have had the economic means to self fund. Medical consultants indicate that for employers with 500 or more employees, self funding is known to provide considerable savings over insured plans. Prior to this change, the SSU Medical Plan was an insured, minimum premium agreement plan, insured and administered by Great West. The Self Funded Plan contains a number of cost saving features. It is now governed under the federal ERISA guidelines rather than by the State Division of Insurance. Under this plan, SSU is no longer subject to paying state sales tax on the administrative services and stop loss insurance portion of the premium. This will result in ongoing savings of $\$ 28,000$ or more per year in sales tax. SSU also is no longer subject to the State of Florida insured plan coverage mandates. This allows the plan to drop expensive coverages such as child health care supervision and substitute custom preventive and wellness coverages, thus offering the flexibility to offer coverages tailored to the needs of its workforce.

An Exclusive Provider Option (EPO) which is similar to an HMO, is expected to result in a $12 \%$ reduction in overall claims cost. The second 1995 Medical Plan option, which was offered beginning in 1992, is the Preferred Provider Option (PPO). The PPO uses the network of Private Health Care Systems (PHCS). PHCS's PPO network of hospitals, physicians, surgical and testing facilities offer discounts of up to $30 \%$ below non-network providers.

In 1995, a calendar year deductible of $\$ 150$ (single)/ $\$ 450$ (family) was applied to all medical plans. Prior to 1995 , only those who used the services of non-network physicians had to pay a deductible. Preventive care was added with a $\$ 300$ calendar year maximum per individual. A Preferred Pharmacy Program is also in place which provides substantial discounts at a network of pharmacies. A summary of the 1995 Plan provisions follows this page.

## GREAT-WEST CARE MULTI-OPTION MEDICAL PLAN SUMMARY EPO . SOUTHERN STATES UTILITTIES PPO

| Chendivivest <br> UNDHR THISHHKN: <br>  | ve ixciausyy: <br>  HXSTCIXNSELBGTBD | Policy \#52765 |  <br>  <br>  |  |
| :---: | :---: | :---: | :---: | :---: |
| $\begin{gathered} \text { APPROVED } \\ \text { AENEFTTS } \end{gathered}$ | NON-APPROVED BENEFTTS | BENELMES | NETWORK BENEFTTS | NON-NETWORK BENEFTTS |
| \$150 | \$150 | 4unual Deductibieninajŭtual | \$150 |  |
| \$450 | \$450 | AImial beductibictamily | \$450 |  |
| None | \$250 | Tet Sonfinemert. OF OHtpatient Stiseyspedinctili | None | \$250 |
| \$7,500/\$15,000 | \$20,000/\$75,000 |  <br>  | \$7,500/\$15,000 |  |
| Unlimited | Unlimited | Lefetiono Maxumumhindmaut | Unlimited | Unlimited |
|  |  | HROVMBRSSHMESS |  |  |
| 90\% After Deductible | 60\% After Deductible |  Jliected by Ditysician <br>  <br>  oftice) | 85\% After Deductible | $70 \%$ After Deductible |
| 90\% After Deductible | 60\% After Deductible | Ficesentive Sans <br> Roulline On mecological Leams Rouitine fhystionls <br> Well Shld Mectrins And linmonizallons <br> \$ion Calenda. K\&a, kiavinumper. thaifluinil | 85\% After Deductible | 70\% After Deductible |
| $90 \%$ After Deductible Maximum 20 Visits/Year | $60 \%$ After Deductible <br> Maximum 20 Visits/Year | Outpatient Mental k Letroust Substarice Abuso Mactriment | $50 \%$ After Deductible <br> \$1,000 Calendar Year Maxirnum | $50 \%$ After <br> Deductible <br> $\$ 1,000$ Calendar <br> Year Maximum |

## GREAT-WEST CARE MULTI-OPTION MEDICAL PLAN SUMMARY (continued) SOUTHERN STATES UTILITIES

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| :---: | :---: | :---: | :---: | :---: |
| APPROVED BENEFITS | NON-APPROVED BENEFITS | BENXETMS | NETWORK BENEFITS | NON-NETWORK BENEFITS |
| Preferred Pharmacy $100 \%$ After $\$ 10$ Generic and $\$ 15$ Name Brand Co-Pay | Non-Preferred Pharmacy 50\% After $\$ 10$ Generic and \$15 Name Brand Co-Pay |  <br>  | 80\% After Deductible | 80\% After Deductible |
| IAnuual oo | bitiblek applos; Lateptaskoted) | TOSNLALS GKRYMES: | kamulathenthke ioplue | as Not(to) |
| 90\% | 60\% |  | 85\% | 70\% |
| 90\% | 60\% |  | 85\% | 70\% |
| 90\% | 60\% | $\qquad$ <br>  | 85\% | 70\% |
| 90\% After Deductible | 60\% | Binaryency Kom <br>  Lumediat Mr Retument | 80\% | 80\% |
| $90 \%$ <br> If approved by employee assistance program $\$ 2,500 / \$ 5,000$ | $60 \%$ <br> If approved by employee assistance program $\$ 2,500 / \$ 5,000$ |  Substanced Abise <br>  | 80\% After Deductible If approved by employee assistance program $\$ 2,5001 \$ 5,0 \% 0$ | . $60 \%$ After Deductible <br> If approved by employee assistance program $\$ 2,5001 \$ 5,000$ |
| 90\% | 60\% | Tainib) Paniling <br> Talall Le catiotis ${ }^{2}$ asectoules and <br>  | 85\% | 70\% |
| 90\% | 60\% |  and Occusational Thetay | 85\% | 70\% |
| 90\% | 60\% |  \$500Ca enday ser Maxinuai <br>  | 85\% | 70\% |

BOTH PLANS INCLUDE LIFE, AD\&D INSURANCE, DENTAL \& MAIL-ORDER DRUG BENEFITS


# Competitive Pay Data and Analysis For Selected Positions 

Southern States Utilities

April 1995

[^1]
## About This Material

Hewitt Associates LLC was asked by Southern States Utilities (SSU) to compare SSU's current compensation levels and salary structure to targeted pay levels in the market place. This analysis is designed to measure the market competitiveness of both the salary structure and SSU's actual pay levels and to provide information for adjusting the structure if appropriate. The process involved collecting competitive market compensation information from published surveys for 46 positions; conducting a custom survey for 4 positions; and using variance, regression, and graphic analyses, to compare SSU's current compensation information to market compensation information.

Of the positions where we used published survey to collect competitive market compensation information, we found solid data for 42 positions. These positions are classified as "benchmark" jobs. For the other four positions, we found some matches that provide useful reference information; however, the job matches for these positions are not as strong as for the others. We have classified these four positions as "reference points."

This report is divided into three sections:

- Summary of Results
- Market Pricing
- Custom Survey


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## Summary of Results

## Market Pricing Summary

A description of the methodology for developing the Estimated Market Values (EMV's) for SSU's jobs and detailed worksheets for each job are contained in the section headed Market Pricing. This section provides a summary of the findings.

## General Observations

Using available published surveys and a custom survey, market data for 50 jobs was complied and compared to SSU's base salaries and salary range midpoints. This analysis shows that most of the SSU jobs (39 of 50 ) are paid base salaries below the "market." SSU's base pay levels on average are $8.8 \%$ below the market for this group. However, the range of SSU pay levels in comparison to the market is quite wide-from $40.1 \%$ below market to $31.4 \%$ above market.

A similar situation was found when comparing midpoints to market. For midpoints, SSU is $13.3 \%$ below the market on average, with a range from $36.9 \%$ below to $22.7 \%$ above market.

This information is summarized in Exhibit \#1 on page 3. When developing the EMV's, in most cases, several surveys were referenced for each job. Exhibit \#2 on page 4 also shows the lowest and highest market values reported for each job.

As a general rule, when actual midpoints and/or pay levels are within a range of $\pm 5 \%$ of the market, pay can be considered to be fully competitive. Over onehalf of SSU's actual pay levels and midpoints fall outside the $\pm 10 \%$ range. The conclusion that can be drawn from this is that while SSU pay rates and midpoints, on average, are relatively low when compared to the market, some rates are significantly high or low. Since the salary structure has not been adjusted in some time, this finding is not surprising. Likewise, since the structure likely has an influence on actual pay levels, it also is not surprising to see the pay levels fall behind market levels.

Another factor that influences these findings is the way SSU has valued jobs in the past. The current findings compare SSU pay practices directly with the market. The existing system places considerable emphasis on internal relationships rather than external comparisons. The difference in these two approaches undoubtedly account for some of the wide variations between SSU's practices and the EMV's.


## Some Specific Observations

- The Corporate Receptionist's base salary and midpoint are significantly above the market.
- The Customer Service Representative I's base salary is significantly below the market and the midpoint is relatively low.
- The Welder's base salary is significantly above the market.
- The Design Drafter I's base salary is significantly below the market and the midpoint is relatively low.
- The PC Support Specialist's base salary is relatively low versus the market, and the midpoint is significantly low.
- The Supervisor of Billing's base salary and midpoint are significantly below the market.
- The Programmer Analyst I's base salary and midpoint are significantly below the market.
- The Communication Manager's midpoint is significantly below the market.
- All of the Rate positions' base salaries and midpoints are significantly below market.

Actual Pay and Midpoints Compared to Market


[^2]Actual Pay and Midpoints Compared to High \& Low Market Values

| SSU Position | $\begin{aligned} & \hline \text { SSU } \\ & \text { Base } \end{aligned}$ | SSU <br> Midpoint | $\begin{aligned} & \text { EMV } \\ & \text { Base } \end{aligned}$ | Lowest Mkt Value | Highest <br> Mkt Value |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Office Clerk | 16.1 | 14.9 | 16.1 | 14.1 | 17.2 |
| Corporate Receptionist | 21.3 | 21.1 | 17.2 | 16.9 | 18.3 |
| Data Entry Operator I | 16.0 | 16.0 | 17.5 | 17.2 | 17.6 |
| Maintenance Tech I | 17.5 | 18.3 | 18.2 | 17.0 | 20.7 |
| Meter Reader I | 16.1 | 17.1 | 18.9 | 18.4 | 21.1 |
| Secretary I | 19.4 | 19.6 | 19.3 | 16.8 | 20.6 |
| Accounting Clerk I | 18.3 | 18.3 | 19.5 | 17.5 | 21.0 |
| Customer Service Rep I | 16.6 | 18.3 | 21.7 | 20.5 | 23.7 |
| Assistant Buyer | 20.6 | 19.6 | 23.4 | 22.5 | 24.0 |
| Computer Operator I | 21.2 | 21.1 | 23.7 | 20.9 | 25.8 |
| Secretary 11 | 21.4 | 21.1 | 24.0 | 19.2 | 25.4 |
| Operator I | 21.9 | 22.8 | 24.4 | 23.8 | 24.8 |
| S Maintenance Tech* | 21.5 | 21.1 | 25.4 | -\% | - |
| Senior Computer Operator | 24.0 | 26.6 | 26.0 | 25.8 | 26.1 |
| Customer Service Rep III | 21.7 | 21.1 | 26.4 | 25.5 | 29.1 |
| Welder* | 35.6 | 28.7 | 27.1 | - | - |
| Design Drafter I | 19.6 | 24.7 | 27.3 | 27.2 | 27.5 |
| Supervisor, Admin Services | 26.1 | 24.7 | 27.7 | 26.1 | 29.0 |
| Operator II | 24.8 | 24.7 | 27.9 | 27.3 | 28.6 |
| Executive Secretary | 24.1 | 22.8 | 28.1 | 24.5 | 29.8 |
| HR Assistant | 24.7 | 26.6 | 28.4 | 26.4 | 29.4 |
| Accountant I | 27.5 | 28.7 | 30.2 | 280 | 31.9 |
| Electrician | 27.9 | 26.6 | 30.7 | 25.0 | 33.1 |
| Chief Drafter | 36.3 | 31.1 | 31.7 | 30.3 | 38.4 |
| PC Support Spec | 27.0 | 22.8 | 32.0 | 26.2 | 37.4 |
| Operator III | 27.0 | 26.6 | 33.0 | 32.0 | 33.9 |
| Accountant II | 33.3 | 36.2 | 33.9 | 32.1 | 38.0 |
| Sprvsr, Customer Service | 34.1 | 28.7 | 34.4 | 29:6 | 39.1 |
| Supervisor of Billing* | 28.3 | 26.6 | 34.9 | - | -- |
| HR Analyst-Benefits | - | 36.2 | 35.0 | 33.1 | 38.9 |
| Project Engineer I | 35.1 | 36.2 | 36.2 | 31.2 | 38.1 |
| HR Analyst-Generalist | 29.8 | 31.1 | 37.1 | 30.3 | 43.0 |
| Programmer Analyst I | 30.2 | 31.1 | 38.5 | 35.7 | 42.7 |
| Purchasing Administrator | 36.2 | 39.1 | 41.5 | 35.2 | 49.4 |
| Tring and Dvipmnt Admin | 43.1 | 42,3 | 43.6 | 41.6 | 46.2 |
| Rate Analyst I | 26.3 | 28.7 | 43.9 | - | - |
| Sr Programmer Analyst | 49.1 | 42.3 | 48.1 | 46.6 | 51.8 |
| Sr Systems Analyst Engin* | 51.0 | 49.3 | 50.1 | - | - |
| Manager, Admin Services | 45.2 | 42.3 | 51.7 | 48.8 | 54.6 |
| Mgr, Gen Acct/Asst Ctrlr | 60.2 | 53.3 | 52.0 | 47.3 | 56.9 |
| Rate Analyst II | 35.3 | 36.3 | 52.2 | - $\%$ | -: |
| HR Administrator | 51.0 | 42.6 | 52.3 | 47.6 | 66.0 |
| Sr Project Engineer | 53.8 | 49.3 | 52.4 | 47.6 | 54.8 |
| Mgr, Fin Plng/Asst Treas | 49.2 | 49.3 | 57.0 | 56.2 | 57.7 |
| Manager, HR | 59.9 | 49.3 | 59.7 | 56.0 | 65.0 |
| Communications Manager | 65.0 | 49.3 | 62.5 | 53.6 | 75.8 |
| Manager, Info Services | 65.1 | 53.3 | 62.8 | 54.9 | 69.4 |
| Sr Rate Engineer | 55.7 | 49.3 | 62.9 | - | - |
| Staff Attorney | 60.7 | 57.0 | 67.9 | 63.3 | 73.5 |
| Director Rates | 60.0 | 57.0 | 90.4 | - | - |

[^3]

## Custom Survey Summary

Details concerning the custom survey of rate positions are contained in a subsequent section headed Custom Survey, but the results are summarized below. The results of the custom survey indicates that SSU base salaries and midpoints are significantly below the market.

Overview of Survey Results

*The survey data has been aged forward to $7 / 95$ to be consistent with the market pricing data. The EMV for Rate Analyst II contains a private source of data in addition to the custom survey data.

## Bonus Results

In most cases, bonuses were paid to at least one of the rate positions. Where bonus data was reported, the average annual bonus ranges from
$\$ 2,100-\$ 15,000$.

## Considerations

The market indicates that SSU's base pay and midpoints for rate positions are significantly below the market; however, several factors need to be considered before making adjustments. Similar positions typically will be found only in other utilities, and the target market for these positions has been identified by SSU as electric utilities. While this may be the marketplace where these jobs exist, electric utilities traditionally have been relatively "high" payors. Although this strategy is changing, pay levels in electric utilities may be higher than needed to attract and retain qualified employees.

Therefore, SSU may want to consider a different pay philosophy for setting compensation levels for rate positions. For example, the pay philosophy for the rate positions might be to pay below (e.g., $15 \%$ to $20 \%$ ) the electric utility market average. The objective is to find a level that will give SSU management a level of comfort that they can attract and retain qualified employees in the rate jobs while not paying more than necessary. This same judgement could be applied to other jobs where the primary "market" has been defined as utilities, especially electric utilities.

## Summary of Data Analysis

Using the information developed from the market pricing process, we conducted three other analyses. Exhibit \#3, on page 8, shows a graphic analysis - using trend lines to compare SSU's actual pay and midpoints to the market data. This analysis illustrates the relationship between three lines: SSU average salaries, SSU midpoints, and market average base salaries.

The graph shows that average salary is low throughout all grades, with the gap between SSU average pay and the market becoming wider as the grade level increases. The midpoint line shows that the lower grade midpoints are consistent with market, but as the grade levels increase, the relationship between midpoint and market becomes progressively wider.

The graph also shows that SSU's midpoint values fall below average salary levels in Grade 9 and above. This could be an indication that while SSU's salary structure is low, efforts have been made to keep actual pay levels at a more competitive position.

We also conducted a statistical analysis of the data. Overall, the $R^{2}$ (an indication of the relationship between two variables, with 1.0 being "perfect") indicates that SSU's current midpoints, while somewhat low, move in a consistent relationship to the market. Likewise, actual salaries follow the same trend-both in relation to the market and to SSU's midpoints. The chart below presents the results of the statistical analysis.
$\mathbf{R}^{2}$ Summary

| Variables | $\mathbf{R}^{\mathbf{2}}$ |
| :--- | :--- |
| SSU Midpoints vs Grades | $96 \%$ |
| SSU Average Salary vs Grades | $93 \%$ |
| Market vs Grades | $91 \%$ |

Exhibit \#4, on pages 9 and 10, shows the market ratio (average salaries divided by EMV's) and compa ratio (midpoints divided by EMV's) by salary grade. The chart shows the midpoints for grades $10,12,13$, and 22 to be $15 \%$ or more below market. The midpoints in other grades were relatively close to market. The chart also shows the actual pay for jobs in Grades 6, 16, and 22 to be $15 \%$ or more below market.

## Indicated Actions

The findings from this study point out several possible actions SSU may want to consider. The findings show that SSU midpoints are approximately $13.3 \%$ below competitive pay levels, on average. However, midpoint values for jobs in lower grades are closer to market averages than those in higher grades.

This indicates that simply raising the structure by a constant percentage will not bring pay targets (midpoints) to the desired level (market average). Rather, to have midpoint values reflect market averages, lower graded jobs should be moved less than higher graded jobs.

However, the situation is complicated further by the distribution of midpoint values around the market values. While average midpoint values are about $13.3 \%$ below the market, there are a number of jobs that are graded considerably higher or lower than the market. The current grade assignments represent a combination of influences that include the use of an internally oriented point factor job evaluation system, some historical considerations, and the time that has passed since the structure was adjusted to the market.

## Costing

For your convenience, we have provided Exhibit \#5, which shows the average percentage cost to bring benchmarks and reference points to market. The overall percentage cost to bring the surveyed positions to market is $17.3 \%$; however, this is an average and should be used with caution. Factors such as number of incumbents in each position and where pay is positioned in the salary range for the incumbents need to be considered when determining actual costs. Additionally, the rate positions, as mentioned earlier, may not require adjustment to the EMV we calculated, and they are significantly influencing the overall percentage. If the rate positions are removed from the calculation, SSU would need to adjust the salaries of the remaining jobs by $12.9 \%$ to bring them to "market averages."

## Next Steps

Based on our discussions with selected members of SSU's management team, we understand that SSU's objective is to maintain a structure that correlates with extemal market averages. Using this structure, jobs can be slotted into appropriate grades by comparing the EMV's to the midpoint values in the structure. Since the midpoint is designed to reflect SSU's desired competitive position, each job is placed into the salary grade with the midpoint closest to the EMV.

The section beginning on page 12 provides a proposed salary structure and shows how the benchmark jobs could be assigned to salary grades. Exhibit \#7 then compares these new midpoints to market values.

## Southern States Utilities

Comparison of SSU Salaries and Midpoints with Market Averages


## $\varepsilon \#$ ! $!9 \div \times \exists$

Southern States Utilities
Market Ratio and Compa Ratio Comparisons
Grades 12-22



Cost to Bring Actual Pay to Market

| SSU Position | SSU Base | EMV Base | \% Cost to Bring to Market |
| :---: | :---: | :---: | :---: |
| Office Clerk | 16.1 | 16.1 | - |
| Corporate Receptionist | 21.3 | 17.2 | - |
| Data Entry Operator I | 16.0 | 17.5 | 9.4\% |
| Maintenance Tech I | 17.5 | 18.2 | 4.0\% |
| Meter Reader I | 16.1 | 18.9 | 17.4\% |
| Secretary I | 19.4 | 19.3 | - |
| Accounting Clerk I | 18.3 | 19.5 | 6.6\% |
| Customer Service Rep I | 16.6 | 21.7 | 30.7\% |
| Assistant Buyer | 20.6 | 23.4 | 13.6\% |
| Computer Operator I | 21.2 | 23.7 | 11.8\% |
| Secretary II | 21.4 | 24.0 | 12.1\% |
| Operator I | 21.9 | 24.4 | 11.4\% |
| Sr Maintenance Tech* | 21.5 | 25.4 | 18.1\% |
| Senior Computer Operator | 24.0 | 26.0 | 8:3\% |
| Customer Service Rep III | 21.7 | 26.4 | 21.7\% |
| Welder* | 35.6 | 27.1 | - |
| Design Drafter I | 19.6 | 27.3 | 39.3\% |
| Supervisor, Admin Services | 26.1 | 27.7 | $61 \%$ |
| Operator II | 24.8 | 27.9 | 12.5\% |
| Executive Secretary | 24.1 | 28.1 | 16.6\% |
| HR Assistant | 24.7 | 28.4 | 15:0\% |
| Accountant I | 27.5 | 30.2 | 98\% |
| Electrician | 27.9 | 30.7 | 10.0\% |
| Chief Drafter | 36.3 | 31.7 | - |
| PC Support Spec | 27.0 | 32.0 | 18.5\% |
| Operator III | 27.0 | 33.0 | 22.2\% |
| Accountant II | 33.3 | 33.9 | 1.8\% |
| Sprvsr, Customer Service | 34.1 | 34.4 | . $9 \%$ |
| Supervisor of Billing* | 28.3 | 34.9 | 23.3\% |
| HR Analyst-Benefits | - | 35.0 | - |
| Project Engineer I | 35.1 | 36.2 | 3.1\% |
| HR Analyst-Generalist | 29.8 | 37.1 | 24.5\% |
| Programmer Analyst I | 30.2 | 38.5 | 27.5\% |
| Purchasing Administrator | 36.2 | 41.5 | 14.6\% |
| Trig and Dvipmnt Admin | 43.1 | 43.6 | 1.2\% |
| Rate Analyst I | 26.3 | 43.9 | 66.9\% |
| Sr Programmer Analyst | 49.1 | 48.1 | - |
| Sr Systems Analyst Engin* | 51.0 | 50.1 | - |
| Manager, Admin Services | 45.2 | 51.7 | 14.4\% |
| Mgr, Gen Acct/Asst Ctrlr | 60.2 | 52.0 | - |
| Rate Analyst II | 35.3 | 52.2 | 47.9\% |
| HR Administrator | 51.0 | 52.3 | 2.5\% |
| Sr Project Engineer | 53.8 | 52.4 | - |
| Mgr, Fin Plng/Asst Treas | 49.2 | 57.0 | 15.9\% |
| Manager, HR | 59.9 | 59.7 | - . |
| Communications Manager | 65.0 | 62.5 | - |
| Manager, Info Services | 65.1 | 62.8 | - |
| Sr Rate Engineer | 55.7 | 62.9 | 12.9\% |
| Staff Attorney | 60.7 | 67.9 | 11.9\% |
| Director Rates | 60.0 | 90.4 | 50.7\% |
| Average |  |  | 17.3\% |



Proposed 1995 Salary Structure and Grade Assignments

## Proposed 1995 Salary Structure and Grade Assignments

## Salary Structure

Based on the results of the market pricing analysis, a new salary structure was created for SSU using the established EMV's as the basis for determining the new midpoints. A constant $10 \%$ midpoint to midpoint differential was used, which determined the number of grades in the new structure. Finally, a range spread of $50 \%$ was applied to all grades. The revised structure contains 16 grades as shown below:

New Salary Structure

|  |  |  |  |  | Salary Range |
| :--- | :--- | :---: | :--- | :---: | :--- |
| Grade | Minimum | Midpoint | Maximum | Midpoint <br> Differential | Range <br> Spread |
| 16 | $\$ 54,300$ | $\$ 67,900$ | $\$ 81,500$ | $10.05 \%$ | $50 \%$ |
| 15 | $\$ 49,400$ | $\$ 61,700$ | $\$ 74,100$ | $9.98 \%$ | $50 \%$ |
| 14 | $\$ 44,900$ | $\$ 56,100$ | $\$ 67,300$ | $10.00 \%$ | $50 \%$ |
| 13 | $\$ 40,800$ | $\$ 51,000$ | $\$ 61,200$ | $9.91 \%$ | $50 \%$ |
| 12 | $\$ 37,100$ | $\$ 46,400$ | $\$ 55,700$ | $9.95 \%$ | $50 \%$ |
| 11 | $\$ 33,700$ | $\$ 42,200$ | $\$ 50,600$ | $10.18 \%$ | $50 \%$ |
| 10 | $\$ 30,700$ | $\$ 38,300$ | $\$ 46,000$ | $10.06 \%$ | $50 \%$ |
| 9 | $\$ 27,900$ | $\$ 34,800$ | $\$ 41,800$ | $9.78 \%$ | $50 \%$ |
| 8 | $\$ 25,300$ | $\$ 31,700$ | $\$ 38,000$ | $10.07 \%$ | $50 \%$ |
| 7 | $\$ 23,000$ | $\$ 28,800$ | $\$ 34,600$ | $9.92 \%$ | $50 \%$ |
| 6 | $\$ 20,900$ | $\$ 26,200$ | $\$ 31,400$ | $10.08 \%$ | $50 \%$ |
| 5 | $\$ 19,000$ | $-\$ 23,800$ | $\$ 28,600$ | $10.19 \%$ | $50 \%$ |
| 4 | $\$ 17,300$ | $\$ 21,600$ | $\$ 26,000$ | $9.64 \%$ | $50 \%$ |
| 3 | $\$ 15,700$ | $\$ 19,700$ | $\$ 23,600$ | $10.06 \%$ | $50 \%$ |
| 2 | $\$ 14,300$ | $\$ 17,900$ | $\$ 21,500$ | $9.82 \%$ | $50 \%$ |
| 1 | $\$ 13,000$ | $\$ 16,300$ | $\$ 19,500$ |  | $50 \%$ |

## Grade Assignments

Each benchmark and reference point job was assigned to a grade by comparing the EMV to the closest midpoint value. Exhibit \#6 shows the grade and range assignments for the benchmark and reference point jobs.

Exhibit \#7 compares SSU's actual pay and revised midpoints to the market. While the percentages for actual pay to market is the same as the previous analysis in Exhibit \#1, the revised midpoint versus market percentage has changed. The revised midpoints are less than one-half a percent below the market, on average, and the largest deviation from the market is $4.6 \%$, indicating the revised midpoints are consistent with the market. By utilizing the revised structure, SSU could have a true market driven structure.

Exhibit \#6

Grade Assignments 1995

| Grade | Minimum | Midpoint | Maxinum | Position Title (EMV) |
| :---: | :---: | :---: | :---: | :---: |
| 16 | 54,300 | 67,900 | 81,500 | Staff Attorney (\$67.9) Director Rates** |
| 15 | 49,400 | 61,700 | 74,100 | Sr Rate Engineer (\$62.9) <br> Manager Info Services (\$62.8) <br> Communications Manager (\$62.5) <br> Manager, HR (\$59.7) |
| 14 | 44,900 | 56,100 | 67,300 | Mgr, Fin Planning/Asst. Treasurer (\$57.0) |
| 13 | 40,800 | 51,000 | 61,200 | Sr Project Engineer (\$52.4) <br> HR Administrator (\$52.3) <br> Rate Analyst II (\$52.2) <br> Mgr, General Accting / Asst. Controller (\$52.0) <br> Manager, Admin Services (\$51.7) <br> Sr Systems Analyst Engin (*R-\$50.1) |
| 12 | 37,100 | 46,400 | 55,700 | Sr Programmer Analyst (\$48.1) |
| 11 | 33,7900 | 42,200 | 50,600 | Rate Analyst I (*R-\$43.9) <br> Training \& Development Admin (\$43.6) <br> Purchasing Administrator (\$41.5) |
| 10 | 30700 | 38,300 | 46,000 | Programmer Analyst I (\$38.5) <br> HR Analyst--Generalist (\$37.1) |
| 9 | 27,900 | 34,800 | 41,800 | Project Engineer I (\$36.2) <br> HR Analyst-Benefits (\$35.0) <br> Supervisor of Billing ( ${ }^{*} \mathrm{R}-\$ 34.9$ ) <br> Supervisor, Customer Service (\$34.4) <br> Accountant II (\$33.9) |
| 8 | 25,300 | 31,700 | 38.000 | Operator III (\$33.0) <br> PC Support Specialist (\$32.0) <br> Chief Drafter (\$31.7) <br> Electrician (\$30.7) |
| 7 | 23,000 | 28,800 | 34,600 | Accountant I (\$30.2) <br> HR Assistant (\$28.4) <br> Executive Secretary (\$28.1) <br> Operator III (\$27.9) <br> Supervisor, Admin Services (\$27.7) |
| 6 | 20,900 | 26,200 | 31,400 | Design Drafter I (\$27.3) <br> Welder ("R-\$27.1) <br> Customer Service Rep III (*R-\$26.4) <br> Sr Computer Operator (\$26.0) <br> Sr Maintenance Tech ( $\%$ \%-\$25.4) |
| 5 | 19,000 | 23,800 | 28,600 | Operator I (\$24.4) Secretary II $(\$ 24.0)$ Computer Operator I (\$23.7) Asst. Buyer ( $\$ 23.4$ ) C |
| 4 | 17,300 | 21,600 | 26,000 | Cust Svc Rep (\$21.7) |
| 3 | 15,700 | 19,700 | 23,600 | Accounting Clerk I (\$19.5) <br> Secretary I (\$19.3) <br> Meter Reader I (\$18.9) |
| 2 | 14,300 | 17,900 | 21,500 | Maintenance Tech I (\$18.2) <br> Data Entry Operator I (\$17.5) <br> Corporate Receptionist (\$17.2) |
| 1 | 13,000 | 16,300 | 19,500 | Office Clerk (\$16.1) |

* Represents a reference point.
** Director Rates slotted into Grade 16; EMV was not used.

Exhibit \#7

Actual Pay and Revised Midpoints Compared to Market

| SSU Position | $\begin{aligned} & \hline \text { SSU } \\ & \text { Base } \end{aligned}$ | New SSU Midpoint | $\begin{aligned} & \text { EMV } \\ & \text { Base } \end{aligned}$ | SSU Actual vs. Market +1- | New SSU Mid vs. Market +/- |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Office Clerk | 16.1 | 16.3 | 16.1 | 0.0\% | +1.2\% |
| Corporate Receptionist | 21.3 | 17.9 | 17.2 | +23.8\% | + 4.1\% |
| Data Entry Operator I | 16.0 | 17.9 | 17.5 | -8.6\% | $+2.3 \%$ |
| Maintenance Tech I | 17.5 | 17.9 | 18.2 | - $3.8 \%$ | - $1.6 \%$ |
| Meter Reader I | 16.1 | 19.7 | 18.9 | -14.8\% | + $4.2 \%$ |
| Secretary I | 19.4 | 19.7 | 19.3 | - $0.5 \%$ | + $2.1 \%$ |
| Accounting Clerk I | 18.3 | 19.7 | 19.5 | -6.2\% | +1.0\% |
| Customer Service Rep I | 16.6 | 21.6 | 21.7 | -23.5\% | -0.5\% |
| Assistant Buyer | 20.6 | 23.8 | 23.4 | -120\% | +17\% |
| Computer Operator I | 21.2 | 23.8 | 23.7 | -10.5\% | $+0.4 \%$ |
| Secretary II | 21.4 | 23.8 | 24.0 | -108\% | -0.8\% |
| Operator I | 21.9 | 23.8 | 24.4 | -10:2\% | -2.5\% |
| Sr Maintenance Tech* | 21.5 | 26.2 | 25.4 | -15.4\% | +3.1\% |
| Senior Computer Operator | 24.0 | 26.2 | 26.0 | -7.7\% | +0.8\% |
| Customer Service Rep III | 21.7 | 26.2 | 26.4 | -178\% | -0.8\% |
| Welder* | 35.6 | 26.2 | 27.1 | +31.4\% | -3.3\% |
| Design Drafter I | 19.6 | 26.2 | 27.3 | -28:2\% | -40\% |
| Supervisor, Admin Services | 26.1 | 28.8 | 27.7 | - $5.8 \%$ | +4.0\% |
| Operator II | 24.8 | 28.8 | 27.9 | -11.1\% | + $3.2 \%$ |
| Executive Secretary | 24.1 | 28.8 | 28.1 | -142\% | +2.5\% |
| HR Assistant | 24.7 | 28.8 | 28.4 | -13.0\% | +14\% |
| Accountant I | 27.5 | 28.8 | 30.2 | - $8.9 \%$ | -4.6\% |
| Electrician | 27.9 | 31.7 | 30.7 | -91\% | +3.3\% |
| Chief Drafter | 36.3 | 31.7 | 31.7 | +14.5\% | 0.0\% |
| PC Support Spec | 27.0 | 31.7 | 32.0 | -15.6\% | -0.9\% |
| Operator III | 27.0 | 31.7 | 33.0 | -182\% | -3.9\% |
| Accountant II | 33.3 | 34.8 | 33.9 | $-18 \%$ | +2.7\% |
| Sprvsr, Customer Service | 34.1 | 34.8 | 34.4 | -0.9\% | +1.2\% |
| Supervisor of Billing* | 28.3 | 34.8 | 34.9 | $-18.9 \%$ | -0.3\% |
| HR Analyst-Benefits | - | 34.8 | 35.0 | - | -0.6\% |
| Project Engineer I | 35.1 | 34.8 | 36.2 | -3.0\% | -3.9\%, |
| HR Analyst-Generalist | 29.8 | 38.3 | 37.1 | -197\% | +32\% |
| Programmer Analyst I | 30.2 | 38.3 | 38.5 | -21.6\% | -0.5\% |
| Purchasing Administrator | 36.2 | 42.2 | 41.5 | -12.8\% | +17\% |
| Trig and Dvlpmnt Admin | 43.1 | 42.2 | 43.6 | $-1.1 \%$ | $-32 \%$ |
| Rate Analyst I | 26.3 | 42.2 | 43.9 | -40.1\% | -3.9\% |
| Sr Programmer Analyst | 49.1 | 46.4 | 48.1 | + $2.1 \%$ | -3.5\% |
| Sr Systems Analyst Engin* | 51.0 | 51.0 | 50.1 | + $1.8 \%$ | +1.8\% |
| Manager, Admin Services | 45.2 | 51.0 | 51.7 | -12.6\% | -1.4\% |
| Mgr, Gen Acct/Asst Ctrlr | 60.2 | 51.0 | 52.0 | +15.8\% | -19\% |
| Rate Analyst II | 35.3 | 51.0 | 52.2 | -32.4\% | $-2.3 \%$ |
| HR Administrator | 51.0 | 51.0 | 52.3 | -2.5\% | -2.5\% |
| Sr Project Engineer | 53.8 | 51.0 | 52.4 | - $2.7 \%$ | $-2.7 \%$ |
| Mgr, Fin Plng/Asst Treas | 49.2 | 56.1 | 57.0 | -13.7\% | -1.6\% |
| Manager, HR | 59.9 | 61.7 | 59.7 | + $0.3 \%$ | +3.4\% |
| Communications Manager | 65.0 | 61.7 | 62.5 | + 4.0\% | -1.3\% |
| Manager, Info Services | 65.1 | 61.7 | 62.8 | + 3.7\% | - $1.8 \%$ |
| Sr Rate Engineer | 55.7 | 61.7 | 62.9 | -11.4\% | - $1.9 \%$ |
| Staff Attorney | 60.7. | 67.9 | 67.9 | -10.6\% | 0.0\% |
| Director Rates | 60.0 | 67.9 | 90.4 | -33.6\% |  |
| Average |  |  |  | -8.8\% | -0.5\% |

[^4]
# EXHIBIT <br> (DGL-3) <br> PAGE 20 OF <br> $\qquad$ 

# EXHIBIT 



## Market Pricing

## Methodology

This section describes the process used in collecting the market information.

## Survey Sources

Published salary surveys have been used to develop the market data package. A list of the published surveys we have used is included in the "Survey Sources" section of this material. We primarily used data from "general industry" and where applicable the utility industry.

## Job Matching

The market data package was developed by matching SSU's jobs with those included in the salary surveys. The matches were established on the basis of job duties and responsibilities, not on the basis of job titles. Job matches were reviewed and verified by SSU personnel. An adjustment was made to one SSU job to reflect additional responsibilities in the survey job which were not included in the SSU job.

## Scope Measures

The scope measures represent the different categories in which the market information is collected and reported in the published surveys. These factors allow us to compare SSU to the survey participants and to ensure that the organizational matches, as well as the position matches, are valid.

Based on SSU's definitions of the market, where possible we used the appropriate geographic locations for each position. In some cases, information on the specific market identified was not available and we used the closest geographic region where data was available.

## Updating Compensation Values

Because the effective dates of market data vary according to the surveys, all data have been updated to a common date, July 1,1995 . The annual adjustment factor used was $4.0 \%$. This percentage is based on Hewitt Associates' annual salary increase survey.

## Estimated Market Value

The Estimated Market Value is the single number representing a close approximation of the market value of a job. Since multiple survey sources and scope measures have been used for each job, we collected a range of market information by job. All of the market values collected were weighted based on the degree of job match and numerically averaged to calculate the Estimated Market Value for each job.
$\qquad$

## Survey Sources

The following is a key to the survey source abbreviations, and a brief description of each published survey used in the analysis.

| ALT-LAW | Altman Neil Mensa, Inc.: Law Department Salary Survey. <br> This is a study of the compensation of lawyers, paralegals, <br> and administrators employed by business corporations and <br> institutions in the United States. The survey includes data <br> on 11 positions from 252 companies and provides infor- <br> nation by size of department, industry, and geographic <br> location. (Data effective October 1994.) |
| :--- | :--- |
| MS | AMS: Foundation Salary Report. This annual salary <br> survey reports data for 76 office, secretarial, professional, <br> data processing and management jobs for nearly 850 <br> companies. Data is presented by National, Regional, <br> Metropolitan, Industry and Company size with both U.S. <br> and Canadian data represented. (Data effective March |
| 1994.) |  |
| BLR-E and | Business \& Legal Reports, Inc.: Surveys of Exempt and <br> BLR-NE <br>  <br> Nonexempt Compensation. These surveys present data <br> from over 2,700 employers representing hourly and annual <br> pay rates in 42 exempt and 39 nonexempt positions across |
| the United States. The data is displayed in individual |  |
| editions by state. Each state edition contains national, |  |
| regional, state, and major city data. (Data effective |  |
| February 1994.) |  |

Dietrich-SS Dietrich Associates, Inc.: Support Services Survey.
This publication provides salary information for 116 administrative jobs in 243 firms across the United States. Data is reported by industry group based on employment size, geographic region, and metropolitan area. (Data effective May 1994.)

Executive Compensation Service, Inc.: Middle Management Report. This two volume survey presents compensation data on 121 middle management positions from 1,849 organizations. Data is included for 21 selected industries; within the industry breakouts, jobs are scoped primarily by sales volume. Regional information is included in a separate volume. (Data effective February 1994.)

Executive Compensation Service, Inc.: Office Personnel Report. The annual edition of this report presents compensation data on 72 nonexempt office personnel positions. Information was provided by 2,590 organizations. The data is displayed nationally, regionally,by state, and metropolitan areas. (Data effective May 1994.)

ECS-P\&S Executive Compensation Service, Inc.: Professional and Scientific Personnel Report. This survey contains compensation data on 115 professional and scientific jobs; that is, jobs which require special training and/or experience. Information was provided by 1,901 companies representing 165,785 incumbents. The data is displayed on a national, regional, sub-regional, and city-wide basis. Industry-specific data is included in a separate volume. (Data effective March 1994.)

Executive Compensation Service, Inc.: Supervisory Management Report. This report contains cash compensation data on 94 supervisory level positions. Each position reported has three levels of responsibility including Lead, Shift Supervisor, and Assistant Department Head. Information was provided by 1,510 companies representing more than 46,972 supervisors. The data is displayed on a national, regional, and metropolitan basis, as well as by industry. (Data effective January 1994.)

ECS-TST Executive Compensation Service, Inc.: Technician and Skilled Trades Personnel Report. This study presents compensation data on 86 technical and skilled trades positions. Information was provided by 995 companies representing 159,641 incumbents. The data is displayed on a national, regional, sub-regional, and city-wide basis. (Data effective June 1994.)


Florida League of Cities-Cooperative Salary Survey. This survey is printed in three sections based on population. The survey provides data on 140 positions generally representative of a city or county. (Data effective October 1, 1993.)

LANG-Legal Abbott, Langer and Associates: Compensation of Legal \& Related Jobs. This three volume survey reports data on 13 jobs from 445 organizations in business, industry, government, and nonprofit organizations. Data is reported by geographic area, type of industry, size of organization, and size of department. (Data effective May 1994.)

TP-FBS Towers Perrin-The Florida Benchmark Survey. This report provides base, bonus, and total compensation information for 130 positions. The data is presented by revenues, industry, and geographic location. The survey contains data from 132 organizations covering 62,620 incumbents. (Data effective January 1, 1994.)

WMM—FAL William M. Mercer, Incorporated: Finance, Accounting \& Legal Compensation Survey Results. This report contains cash compensation data for 95 jobs in the finance, accounting, and legal professions. In addition, compensation information is displayed for 12 executive general management jobs. Compensation information was submitted by 1,370 reporting locations representing 51,564 individual salary rates. Data is displayed for each job on a nationwide basis, by type of industry, as well as for individual cities where sufficient data is available. (Data effective March 1994.)


WMM-HRM Society for Human Resource Management/William M. Mercer, Incorporated: Ниman Resource Management Compensation Survey Results. This study reports compensation data for 58 jobs in the area of human resource management. Information was submitted by 1,385 participants reporting more than 20,000 individual salary rates. Data is displayed for each job on a nationwide basis, by type of industry, as well as for individual cities. (Data effective February 1994.)

WMM-IS William M. Mercer, Incorporated: Information Systems Compensation Survey Results. This report contains competitive salary information for 117 positions in the information systems area. Compensation information was submitted by 1,098 reporting locations representing 138,747 individual salary rates. Data is displayed for each position on a nationwide basis, by type of industry, by type of environmental complexity, as well as for individual cities. (Data effective April 1994.)

WMM-MLM William M. Mercer, Incorporated: Materials and Logistics Management Compensation Survey Results. This report contains compensation information for 61 positions in the area of materials and logistics-management. Data was submitted by 169 firms reporting 5,901 individual salary rates. The salaries are displayed for each position on a nationwide basis, by type of industry, as well as for individual cities. (Data effective January 1994.)

## Market Pricing Worksheets

The market pricing worksheets used to generate the EMV for each position are provided beginning on page 20. Explanations of the market pricing worksheets columnar headings are listed below:

Survey Source:
Survey Position Title and Industry Classification:

Survey Scope:

Number Reported:
Cos. (Companies):

Inc. (Incumbents):

Data Type:

Survey Effective Date:

Unadjusted Data "Base":

Update Factor:

Compensation Data "Base":

Weight:

The source of the salary information.
The position title and industry cut from the published survey.

The parameter data that details the relative size of the comparator companies, or other section of the data.

The number of companies that responded to the survey position.

The number of position incumbents ${ }^{--}$ for which survey information was reported.

The median, average, weighted average, regression, or third quartile value, as noted.

The date as of which the compensation data reported in the survey is effective.

The raw base salary data reported for the position.

The percentage factor used to adjust the data from the effective date of the survey to July 1, 1995.

The "aged" or adjusted base salary data.

The weight assigned to each survey to be used for calculating the estimated market value for the position.


- M=MDDIAN; A=AVERAGL W=WEGGIITD AVERAGE; R=RBORESSION; 3RD=TIIIRD OUARTILE



L. :


Hewill Associales





Hewilt Associates




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- M=MCDUAN; A=AVERAGE; W=WEKIITED AVERAGE; R-RBGRUSSION; 3RD-TIIRD OUARTIE









Hewill Associates










- M-MEDLAN; $A=A V E R A G E ;$ W-WEKGHTED AVERAGR: R=RYORESSION; 3RD-11IIRD OUARTLIA

- Mamidian; AmAVITAGL; W=WEGGITIED AVERAGE; RERDGRGSIION: 3RD-TIIRD OUARTIIS













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# EXHIBIT _(DGL.3) 

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## Custom Survey

## Why a Custom Survey

Four rate positions were identified to be included in the market pricing activity. These positions included:

Rate Analyst I
Rate Analyst II
Rate Engineer
Director of Rates
Because there was a lack of data in published salary surveys for these positions, SSU requested that Hewitt Associates conduct a custom survey from selected organizations. Because of short time frames, it was determined that a fax survey would be the most effective way to collect the data.

## Survey Companies

SSU developed a list of seven companies to target for participation in the Custom Survey. The following Companies provided data for the survey:

Avatar Utilities
Florida Power Corporation
Florida Power \& Light Company
Gulf Power Company
Seminole Electric Cooperative Incorporated
Tampa Electric Corporation
One company, Palm Coast Utilities, did not participate in the survey, because they do not have rate positions.

## Survey Methodology

A survey questionnaire was developed by Hewitt Associates and sent by fax to each participant. The questionnaire provided a brief description for each of the four rate positions. The information requested included:

- Number of incumbents;
- Salary range midpoint;
- Lowest salary;
- Average salary;
- Highest salary; and
- Bonus or incentive eligibility and amount.

A copy of the survey questionnaire is included in Exhibit \#8 on pages 73 and 74.

The participants were requested to supply compensation information effective May 1994. Each participant was requested to return the survey via fax within a few days.


As the completed questionnaires were received, Hewitt Associates reviewed the data for consistency. In general, the data was closely related for all the survey companies.

- The data collected in the survey was used to determine an Estimated Market $V$ value (EMV) for each rate position. The methodology used to determine the EMV is the same as described in the previous section under methodology. Some published data was used in the calculation of the EMV for the Rate Analyst I and Rate Analyst II positions. The market pricing worksheets are included in the Market Pricing worksheet section.



## Survey of Rate Positions in the Utilities Industry

## Rate Analyst I

Responsible for conducting rate design studies, cost of service studies, running the department's computerized Revenue Requirement Account System and the rate design system programs to develop the data necessary to file rate applications and reports before the State and County regulatory authorities. This position requires a four year college degree in Business, Accounting, Finance, or related area with one to four years of utility experience.

Number of Incumbents: $\qquad$
Salary Range Midpoint: \$ $\qquad$
Actual Salary Data:

| Lowest Salary | Average Salary | Highest Salary |
| :--- | :--- | :--- |
| $\$$ | $\$$ | $\$$ |

Bonus or Incentive Eligible? $\qquad$ Amount: \$ $\qquad$

## Rate Analyst il

Responsible for conducting rate design studies, cost of service studies, running the department's computerized Revenue Requirement Account System and the rate design system program. Utilizes data associated with the purchase/modification/acquisition of plants and capital equipment to file rate applications before State and County regulatory authorities. Assists in the administration of rate applications. This position requires a four year college degree in Business, Accounting, Finance, or related area with a minimum of three years of utility experience.

Number of Incumbents: $\qquad$
Salary Range Midpoint: \$ $\qquad$
Actual Salary Data:

| Lowest Salary | Average Salary |
| :--- | :--- |
| $\$$ | $\$$ |

Bonus or Incentive Eligible? $\qquad$

Highest Salary
$\$$ $\qquad$
Amount: \$ $\qquad$


Exhibit \#8

## Senior Rate Engineer

Responsible for conducting engineering, evaluation and rate studies relating to company revenue requirements. This position utilizes data associated with the purchase/modification/acquisition of plants and capital equipment to submit, support and complete rate applications and annual engineering and other reports before State and County regulatory authorities. Assists with billing and rate administration. This position requires a four-year college degree in Business, Accounting, Economics, Finance, or Engineering and two to four years experience in utility accounting, rates or engineering.

Number of Incumbents: $\qquad$
Salary Range Midpoint: \$ $\qquad$
Actual Salary Data:

| Lowest Salary |
| :--- |
| $\$$ |

Average Salary
$\$$ $\qquad$
Bonus or Incentive Eligible? $\qquad$

Highest Salary
\$

Amount: \$ $\qquad$ - -

## Director, Rates

Monitors and directs the research, analysis and preparation of rate cases, indexing and pass-throughs, consistent with State regulations and in accordance with established company policies and procedures. This position requires a four-year degree in Accounting, Finance, Business, Economics, Mathematics or related field and a minimum of eight years of rate making and design experience in a regulated utility environment.

Number of Incumbents: $\qquad$
Salary Range Midpoint: \$ $\qquad$
Actual Salary Data:


Bonus or Incentive Eligible? $\qquad$

Highest Salary
\$


## SSU

COMPANY-WIDE GENERAL TRAINING SCHEDULE

January - March, 1995

Registration $\ggg$ Be sure to fill out the Registration Form (attached as the last page) and return it to Jim Blondin before February 3rd. It is your best way to help in determining what training courses will be offered and when they will be offered.

## Training Registration Form

How would you like to influence the training at SSU? You have that opportunity in your hands right now. Attached are descriptions of some coursed that are available and a Course Registration Form. Please take a few minutes to fill out the form and return it to Jim Blondin by February 3rd. It will help shape our training efforts for years to come. Future training schedules will reflect your "votes" on the forms that are received.

## Windows Training

The Company is continuing to upgrade to Windows based software. The Microsoft Office "suite" includes Windows 3.1, Word for Windows 6.0, Excel 5.0 for Windows and PowerPoint 2.0 . Basic Windows training for those in
 Apopka is near completion. Other areas will
be trained near the time when the upgrade takes place.

One-hour training sessions are planned for Apopka regarding various subjects related to the Microsoft Office Suite. For example, a session regarding "mail merging" with Microsoft Word 6.0.

In some cases, learning on our own to perform a task in this software takes a considerable amount of time to perfect. However, with the guidance of someone who already invested the time, the amount of time to learn such a task can be shortened considerably. In addition, people gain confidence if they know they can try new things under the guidance of another. Are you are willing to share something that you believe would help others with this software? If you are willing to share with others, let Jim Blondin know right away. Don't worry if you've never made a presentation. Jim will help you prepare for it.


If you have a topic that you would like to see presented in one of these one-hour sessions; or if you have questions regarding Windows training, contact Jim Blondin at Ext. 202.

## Mid-Florida Tech Training

The training that we obtain from Mid-Florida Tech is very cost effective. It costs only $\$ 0.75$ per person per hour if 10 or more people attend for a particular session. That amounts to $\$ 45$ for a six-hour training session. If less than 10 people attend, the price structure changes to the rate of $\$ 30$ per hour ( $\$ 180$ for a six-hour day). Even at the latter rate, the training is a bargain.

Training \& Development will be happy to continue to coordinate sessions for anyone who wants to obtain this inexpensive training. However, as mentioned in the $1 / 6 / 94$ High Pressure Bulletin, payment for attendees will be allocated to the respective cost centers. The form (on page 8) should be completed by the attendee and signed by the cost center supervisor and returned to Barbara Valdez before we will sign you up.

## Employee Orientation

Human Resources will continue to provide orientation training on a quarterly basis. The next orientation for new employees will be on March 14th.

## Kaset Training

"Everybody Has A Customer" (EHAC) training helps us deal better with each other. The two-day course gives tools for understanding behaviors; building rapport with others; recovering from others' actions so that future actions are not affected; and giving service in ways that let employees in
other departments know that we care and are trying to cooperate. It is essential training for everyone.

## What Operations and Maintenance Employees Need to Know About the New SSU Safety Plan and Safe Operating Procedures (SOP \# 1, 2 \& 3)

Jim Barratt will be providing this safety training to all operations and maintenance employees and their supervisors. Emphasis will be placed on the training required to implement
Bloodborne
Pathogens SOP and initial
 training on the requirements of the Respiratory Protection SOP. He plans to provide the 2.5 hour training session in each of the regions as well as in Apopka in January.

## Myers - Briggs

Myers-Briggs is a personal questionnaire. It asks you to answer questions about your preferred ways of (1) doing things, (2) taking in information and (3) deciding things. Most people find it a revealing and fun experience.

Why take the MBTI? Most organizations like SSU offer it to show people how to work more effectively with people who take in information and process information differently from ourselves. It is very useful in (I) understanding why others don't think the way we do, (2) understanding why others don't do things the way we think they should and (3) how to deal with others more effectively.

 OF 10

## Train-the-Safety-Trainer

The intent of this training is to assist our Safety Training Coordinators. This seminar was well received by those who attended last August.

The session will be conducted in the Kravitz Training Room from 8:30 to 3:30 on March 28. If you have any questions or a problem with this schedule, contact Jim Barratt at Ext. 292.


Registration>>> You may register for any of the sessions below by calling our receptionist (Barbara Valdez) at Ext. 0 . Dates (and times) are subject to change - so be sure to call before attending. Please have the courtesy to give notice 24 hours in advance if you are unable to attend a course for which you signed up so we can get someone else in your place.

DATES
January 26
January 26
January 27
January 27
January 31
January 31
February 1
February 2
February 3
February 6
February 8
February 8
February 9
February 9
February 9
February 14
February 15
February 16
February 21
February 22
February 22
February 23
February 23
February 23
February 24
February 27
February 28
March 7
March 14
March 14
March 28

## TITLE

Safety Training
Safety Training
Safety Training
Excel 5.0 (beginning)
Safety Training
Safety Training
Safety Training
Safety Training
Introduction to Windows
Intermediate Excel
Safety Training
Safety Training
Advanced Excel
Safety Training
Safety Training
Safety Training
Safety Training
Everybody Has A Customer (day 1 of 2)
Safety Training
Safety Training
Safety Training
Everybody Has A Customer (day 2 of 2)
Safety Training
Safety Training
Intermediate Word
Advanced Word
MBTI (Myers-Briggs) in Organizations
Safety Training
Safety Training
New Employee Orientation
Train the Safety Trainer


## Additional Sessions

If you are planning training sessions of interest to others, please forward the information so it can be included in the next edition of this schedule. Please give suggestions about such sessions and any other comments about this Bulletin to Jim Blondin.

## Descriptions of Available Courses

## Training for New Employees

## Employee Orientation

This training is comprised of a review of SSU's compensation practices and benefits, an introduction to organizational development, a tour of Apopka Offices and issuance of $\operatorname{DD}$ badges, and overviews of key company functions such as rates, customer service, purchasing, environmental services, corporate development and safety.

## Everybody Has a Customer

"Everybody Has A Customer" (EHAC) training helps us deal better with each other. The two-day course gives tools for understanding behaviors; building rapport with others; recovering from others' actions so that future actions are not affected; and giving service in ways that let employees in other departments know that we care and are trying to cooperate. It is essential training for everyone.

## General Emplovee Training

## Corporate Economics

This is a nuts-n-bolts course is based on CareerTrack's "Finance for Nonfinancial Professionals." The video tape enhanced course is separated into three sessions (Speaking Accounting, Reading Financials). Videos: approximately 1 hour and 30 minutes each.

## Managing Stress

Is stress bad for us? What's the relationship between stress and personality types? How does stress affect the organization and what are stress management techniques that can be applied at work? What can I personally do about my own stress? This workshop offers answers to these and other questions that affect our lives both at work and away. Video: Managing Stress -. 26 minutes.

## Myers-Briggs (Personality Types)

Myers-Briggs is a personal questionnaire. It asks you to answer questions about your preferred ways of (1) doing things, (2) taking in information and (3) deciding things. Most people find it a revealing and fun experience. It is very useful in (1) understanding why others don't think the way we do, (2) understanding why others don't do things the way we think they should and (3) how to deal with others more effectively.

## Problem Solving

Have you ever felt overwhelmed by a project and wondered if there was a systematic way for groups to analyze problems and situations and arrive at consensus? Based on The New Rational Manager, this halfday workshop is an overview of problem solving and decision making principles. It describes: (1) how resolving problems falls into four specific thinking patterns, (2) the four basic steps in each pattern and, (3) the process questions for each thinking pattem. Videos: Creative Problem Solving -. 26 minutes and Problem Solving Strategiew: The Synectics Approach -- 28 minutes.

## Speaking in Public

This workshop is designed to help those who are new to speaking in public. It will help those who will be making presentations outside the company (e.g., speakers bureau) and inside the company (e.g., managers meetings). It provides tips for dealing with fear and things you can do in advance of your presentation, just
before your presentation, during your presentation and when you've finished your presentation. Video: Be Prepared to Speak -- 27 minutes.

## Telephone Etiquette

Because people cannot observe facial expressions and body language via telephone conversations, less than $50 \%$ of the potential message is communicated. Telephone etiquette will help anyone who uses the telephone (1) create a positive, professional image, (2) enhance listening skills and, (3) increase confidence and competence when dealing with people by telephone. Vieeos: Who Are You, By the Way? -- 10 minutes and Professional Telephone Skills -- approximately 2 hours.

## Time Management

Have you ever wished for more than 24 hours in a day? Would you like to know how can you get more done? How effectively do you manage your time? Are you doing things that you like to do at the expense of things that are more important to do? How many of our activities occupy most of our time? Learn answers to these and other time saving questions in the Time Management workshop.

## Supervisory Training

## Coaching

Getting the best out of people in today's uncertain world means empowering employees by involving them in decision-making and that means assuming a leadership role emphasizing "helping" and "facilitating" rather than "assigning" and "controlling." This workshop helps leaders (1) understand the importance of coaching as a managerial tool, (2) learn the five steps in the coaching process and, (3) identify potential barriers to coaching and suggests some strategies for overcoming those barriers.

## Delegating

One of the most important of all organizational skills is the leader's ability to delegate authority among those who work for him/her. Most all of us can recall examples of improper and ineffectual delegating from our experience. If there is no question that delegating is beneficial to the organization, why is it so often mishandled? This workshop examines the hidden traps that can undermine our efforts and provides basic steps that will aid the leader in building a stronger and more efficient department. Video: Delegating -- 28 minutes.

## Effective Meetings

Much time is wasted by many people in meetings. This happens because the wrong people are at a meeting, the wrong number of people are attending, conflicts slow down the process, there is a lack of leadership and/or there has been too little preparation for the meeting. Leam how to conduct meetings that don't waste the time of many.

## Managerial Impact (The Sid Story)

The purposes of this workshop are twofold: first, to highlight the personal impact that leaders have on productivity and second, to develop the leaders' recognition of themselves as motivators. It is based on the film titled "The Sid Story." Its objectives are for viewers to: (1) establish a positive work climate in which employees know what is expected, (2) see the advantages of being out in the operations they supervise looking for things being done right and, (3) provide Planned Spontaneous Recognition.
$\qquad$

## Positive Discipline

Virtually all employees come to work to do a good job. Sometimes, however, there becomes a need to deal with an infraction. Do you know the process to effectively (and properly) respond to a disciplinary situation? Corrective action should be viewed as part of a learning process designed to encourage an individual to improve performance or to become more aware of the need to conform with established Company policy. This workshop discusses the theory and shows how the use of SSU's policy can help bring about changes) that affect both the company and the employee in a positive manner. Video: Discipline Without Punishment -- 21 minutes.

## Team Building

Good teams don't just happen! Team building involves trust building which usually takes time to develop. There are several stages through which teams evolve before they generate synergy. You should be able to recognize and understand these in order to proactively change your group into a team. This workshop provides insight into the stages of team building and strategies to enhance the team's development. Video: Team Building -- 21 minutes.

Sign-Up Form<br>Mid-Florida Technical Institute



Name of Class: $\qquad$
Date of Class: $\qquad$
Cost Center: $\qquad$
Supervisor Approval: $\qquad$

# Sign-Up Form 

Mid-Florida Technical Institute

Name of Class: $\qquad$
Date of Class: $\qquad$
Cost Center: $\qquad$
Supervisor Approval: $\qquad$

Mid-Florida Technical Institute

Name of Class: $\qquad$
Date of Class: $\qquad$
Cost Center: $\qquad$
Supervisor Approval: $\qquad$


## Course Registration Form <br> Please complete and return this form to Jim Blondin by February 3rd.



## Training that could be obtained (if sufficient interest is shown)

EAP (Employee Assistance Program) "Brown-Bag" Workshops
Aids Facts
Assertiveness Training
Better Management of Your Time
Co-Dependency
Coping with Difficult People
Coping with Teenagers
Divorce Issues
Drug-Free Workplace Training
Holiday Sues
Parenting
Personality \& Work Styles
Skills to Help You Cope Dining a Crisis
Stress

$\qquad$
increase for Orange-OsceolaUtilities, Inc. in Osceola County,and in Bradford, Brevard, Charlotte,Citrus, Clay, Collier, Duval,Highlands, Lake, Lee, Marion,Pasco, Putnam, Seminole, St. Johns,St. Lucie, Volusia, and WashingtonCounties by Southern StatesUtilities, Inc.

Cross Examination Exhibit 143

Excerpt from Florida League of Cities Cooperative Salary Survey Group I: Cities over 50,000 Population

February, 1994

FLOATS PUBLIC SERVICE COMMISSION DOCKET
Co. $\frac{9504 \text { MANY }}{}$ Exhibit no 143 MINES:
DATE: 4/29/दा

# FLORIDA LEAGUE OF CITIES COOPERATIVE SALARY SURVEY 

## GROUP I: <br> Cities Over 50,000 Population

Florida League of Cities, Inc.
201 West Park Avenue Post Office Box 1757
Tallahassee, Florida 32302-1757
(904) 222-9684 Suncom: 278-5331

February 1994

## Responding Group I Cities and Counties Over 50,000 Population

City or County Name Population
Alachua County ..... 186201
Bay County ..... 131347
Boca Raton ..... 63224
Brevard County ..... 417740
Broward County ..... 1294090
Citrus County ..... 98623
Clearwater ..... 99856
Collier County ..... 168514
Coral Springs ..... 86327
Escambia County ..... 267800
Fort Lauderdale ..... 147678
Gainesville ..... 85587
I Iernando County ..... 108112
Ilighlands County ..... 72157
IIilsborough County ..... 853990
I Iollywood ..... 123296
Indian River County ..... 94091
Jacksonville ..... 653206
lake County ..... 162579
Lakeland ..... 71896
I.argo ..... 66513
Lauderhill ..... 50034
lee County ..... 350809
leon County ..... 202570
Manatee County
21331
21331
Marion County ..... 206642
City or County Name

$\qquad$
Population
Martin County ..... 105031
Melbourne ..... 62426
Metropolitan Dade County ..... 1982901
Miami Beach ..... 9361
Monroe County ..... 80968
North Miami ..... 50090
Okaloosa County ..... 149997
Orange County ..... 712637
Orlando ..... $16 \times 675$
Palm Beach County ..... 896970
Pembroke Pines ..... 70909
Pensacola ..... 59833
Pinellas County ..... 860736
Plantation ..... 70514
Pompano Beach ..... 72671
Port St Lucie ..... 62813
St. Lucie County ..... 158937
St. Petersburg ..... 239132
Sarasota ..... 51058
Sarasota County ..... 287203
Seminole County ..... 305872
Sunrise ..... 69187
Tallahassee ..... 129258
Tampa ..... 281837
Volusia County ..... 383983
West Palm Beach ..... 68270

512 PLANT OPERATOR
B

ACTUAL L/S/H \#
CITY MINIMUM MAXIMUM AVERAGE MATCH INC ABOVE
TITLE

| CITY | MINIMUM | MAXIMUM | AVERAGE | MATCH | INC | Above | TITLE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Bay County | 18512 | 27872 | 18741 | S | 1 | Y | Water Trt Plt/Lead opr |
| Boca Raton | 23150 | 37460 |  | S |  |  | 5\% add'l for B only |
| Brevard County | 22027 | 30846 | 25311 | L | 2 |  | Chief Treatment plt opr B |
| Broward County | 19695 | 32272 | 28580 | L | 41 | Y | Plant Opr II |
| Clearwater | 22547 | 32650 |  | S |  | Y | Plt Opr B |
| Collier County | 21216 | 31491 | 27884 | S | 15 | $\mathbf{Y}$ | Sr plt Opr |
| Escambia County | 18920 | 28380 | 27315 | S | 13 | N | WW Trt plt opr II |
| Fort Lauderdale | 25542 | 33488 | 33488 | S | 5 | Y | W Trt plt opr II |
| Gainesville | 23566 | 30921 | 28868 | S | 1 | N | WW Plant opr II |
| Hernando County | 18762 | 27206 | 23899 | S | 1 | Y | Water Plt Opr II |
| Hollywood | 23944 | 35163 |  | S |  | N | Operator II |
| Indian River County | 23733 | 32032 | 24771 | S | 15 |  | Water/WW Plt opr B |
| Jacksonville | 27804 | 43716 | 40371 | S | 4 | Y | Water Opr Supv |
| Lakeland | 21403 | 30118 | 26021 | S | 7 | Y | W/Plant Opr II |
| Lauderhill | 21600 | 30000 |  | S |  | N | plt opr B |
| Lee county | 21034 | 30498 | 24469 | S | 10 |  | Utl plt opr B |
| Manatee County | 20904 | 34445 | 22235 | S | 11 | N | W/WW plt opr II |
| Martin County | 19989 | 29994 | 24078 | S | 10 | Y | Treatment plt opr II |
| Melbourne | 21705 | 26188 | 25919 |  | 4 |  | WTP Opr B |
| Metro Dade County | 20278 | 30983 | 32129 | S | 29 |  | Treatment plt opr II |
| Okaloosa County | 15329 | 30389 | 21757 | S | 3 | Y | WWTP Opr II |
| Orange County | 20384 | 29411 | 25002 |  | 29 |  | Opr 1 B |
| orlando | 22360 | 29452 | 23366 | S | 10 |  | Tre plt opr B |
| Palm Beach County | 23662 | 35895 | 30630 | S | 12 | N | Utl plt Opr II |
| Pembroke Pines | 21830 | 32880 | 24569 | S | 8 | $\mathbf{y}$ | W/Plt opr II |
| Pinellas County | 19722 | 30603 | 24190 | H | 2 | Y | W/Plant Opr |
| Plantation | 25237 | 35360 | 33280 | S | 8 | N | plt opr B |
| Sarasota | 18839 | 28258 | 23661 | S | 5 |  | Sr plt opr |
| Sarasota County | 21110 | 31807 | 22483 | S | 3 | Y | Treatment Plt B Opr |
| Seminole county | 19697 | 29244 | 21008 | S | 3 |  | Treatment plt opr B |
| st Lucie County | 19240 | 27684 | 21316 | S | 5 | Y | Plant Opr B |
| St Petersburg | 25792 | 34694 | 32271 | S | 8 |  | W Plt Opr III |
| Sunrise | 25721 | 34593 |  | S | 8 | N | Sr Utl Opr |
| Tallahassee | 18970 | 30326 | 25123 | S | 7 | $\mathbf{Y}$ | WW Treatment Opr B |
| Tampa | 24398 | 34715 | 29821 | S | 8 | Y | W/Plant Opr II |
| Volusia county | 19344 | 28995 |  | S |  |  | Treatment plt opr B |
| West Palm Beach | 28829 | 40456 | 33976 | H | 9 | Y | Lead W/WW plt opr |


| In re: Application for a rate |  |
| :--- | :--- |
| increase for Orange-Osceola |  |
| Utilities, Inc. in Osceola County, |  |
| and in Bradford, Brevard, Charlotte, |  |
| Citrus, Clay, Collier, Duval, |  |
| Highlands, Lake, Lee, Marion, | Docket No. $950495-W$ SS |
| Martin, Nassau, Orange, Osceola, |  |
| Pasco, Putnam, Seminole, St. Johns, |  |
| St. Lucie, Volusia, and Washington |  |
| Counties by Southern States |  |
| Utilities, Inc. |  |

Cross Examination Exhibit $\qquad$

Excerpt from Florida League of Cities Cooperative Salary Survey Group II: Cities 10,000-50,000 Population April, 1994

FLORIDA PUBLIC SERVICE COMMISSION DOCKET

# FLORIDA LEAGUE OF CITIES COOPERATIVE SALARY SURVEY 

## GROUP II:

Cities 10,000-50,000 Population

Florida League of Cities, Inc. 201 West Park Avenue Post Office Box 1757
Tallahassee, Florida 32302-1757 (904) 222-9684

April 1994

## Group II Cities and Counties Between 10,000 and 50,000 Population

City or County Name Population
Altamonte Springs ..... 36380
Apopka ..... 15037
Atlantic Beach ..... 12495
Bartow ..... 15002
Bradenton ..... 46342
Bradford County ..... 23056
Casselberry ..... 22227
Coconut Creek ..... 30009
Cooper City ..... 23955
Coral Gables ..... 40700
Crestview ..... 10942
Deerfield Beach ..... 47320
Deland ..... 17048
Delray Beach ..... 48346
Dunedin ..... 34771
Edgewater ..... 16394
Eustis ..... 13654
Flagler County ..... 31999
Fort Myers ..... 45043
Fort Pierce ..... 36722
Fort Walton Beach ..... 21745
Gadsden County ..... 42472
Greenacres ..... 19442
Gulfport ..... 11761
Haines City ..... 12037
Hamilton County ..... 11535
Holly Hill ..... 11198
Jackson County ..... 42577
Jacksonville Beach ..... 19199
Jupiter ..... 25898
Kissimmee ..... 30984
Lady Lake ..... 10109
Lake City ..... 10087
Lake Worth ..... 28387
City or County Name ..... Population
Lauderdale Lakes ..... 27577
Leesburg ..... 15063
Lighthouse Point ..... 10391
Miami Springs ..... 13230
Miramar ..... 41872
New Smyrna Beach ..... 17231
Niceville ..... 10915
North Lauderdale ..... 26554
North Palm Beach ..... 11747
North Port ..... 13038
Ocala ..... 41863
Ocoee ..... 15107
Opa-Locka ..... 15255
Ormond Beach ..... 30570
Panama City ..... 35427
Pinellas Park ..... 43652
Plant City ..... 24033
Port Orange ..... 37311
Punta Gorda ..... 11587
Rockledge ..... 16753
Safety Harbor ..... 15427
Sanford ..... 34156
Sebastian ..... 11569
South Daytona ..... 12632
St Augustine ..... 11679
St Cloud ..... 14297
Stuart ..... 12195
Sweetwater ..... 14096
Tamarac ..... 46375
Temple Terrace ..... 16976
Titusville ..... 40405
Venice ..... 17491
Vero Beach ..... 17443
Winter Haven ..... 24852

ACTUAL L/S/H \#
CITY MINIMUM MAXIMUM AVERAGE MATCH INC ABOVE TITLE

| Apopka |  | 19262 | 28719 |  | S | 1 | N |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Bartow |  | 20675 | 22901 |  |  | 5 |  | Plt Opr II |  |
| Bradenton |  | 20218 | 29078 | 24478 |  | 2 |  | Opr B |  |
| Cooper city |  | 25337 | 34928 | 31362 | $S$ | 4 | Y | Treat plt Opr |  |
| crestview |  | 16931 | 21694 |  |  | 1 |  | Plt Opr B |  |
| Deerfield Beach |  | 22668 | 33491 | 31891 | L | 13 | Y | Water Opr II |  |
| Delray Beach |  | 24209 | 35113 | 30395 | S | 3 |  | Treatment plt opr B |  |
| Dunedin |  | 17481 | 27543 |  | S | 3 | N | Water Plt Opr I |  |
| Edgewater |  | 20021 | 28030 | 23948 | S | 1 | N | W/WW Plt opr B |  |
| Eustis |  | 19822 | 29203 | 21830 | S |  | N | Utl Foreman |  |
| Fort Myers |  | 19635 | 29432 | 22550 | S | 6 |  | Plt Opr B |  |
| Fort Walton Beach |  | 15726 | 24315 | 16203 | S | 1 | Y | Treatment Opr II |  |
| Haines City |  | 18755 | 22408 |  |  | 4 |  |  |  |
| Holly Hill |  | 17844 | 26231 | 23774 | H | 1 | N | W/WW Trt Plt Opr |  |
| Jupiter |  | 23026 | 33238 | 28525 |  | 12 |  | Water Plt Opr II |  |
| Kissimmee |  | 21648 | 30461 | 26746 | S | 9 | Y |  |  |
| Lake city |  | 16085 | 23680 | 16932 | S | 1 |  | Water plt Opr B |  |
| Lake Worth |  | 22589 | 31824 | 24991 | S | 2 | N | Plt Opr B |  |
| Leesburg |  | 20862 | 26624 | 24263 | S | 2 | N | W/WW Opr B |  |
| Miramar |  | 25000 | 35000 |  | S | 3 |  |  |  |
| North Lauderdale |  | 24808 | 34198 | 34735 | H | 1 |  | Asst Ch W/Tr Pl Opr |  |
| North Port |  | 20675 | 29203 | 24575 | S | 2 | N |  |  |
| Ocala |  | 20302 | 29437 |  | L | 2 |  | Treat Pl Opr Mech |  |
| Ormond Beach |  | 20444 | 29098 | 25541 | S | 2 | $N$ | Plt Trt Opr B |  |
| Panama City |  | 17316 | 26520 | 19682 | S | 2 | Y | WTP Opr II |  |
| Port orange |  | 21495 | 31830 | 32357 | S | 5 | Y | Shift Supv |  |
| Punta Gorda |  | 22455 | 33022 | 29373 |  | 4 | Y | Treat Pl Opr B |  |
| Rockledge |  | 18318 | 26780 | 19527 | S | 2 | N | B Opr/Tech |  |
| Sanford |  | 18602 | 27971 |  | S | 2 |  | Utl Water plt opr II |  |
| St Augustine |  | 21924 | 29597 | 26020 | S | 3 | N | W/WW Pl Opr B |  |
| Stuart |  | 19282 | 25067 | 20053 | S | 1 | N | + \$900/yr for Lic |  |
| Tamarac |  | 25210 | 46115 | 37247 | S | 2 | N | Plt Opr B |  |
| Temple Terrace |  | 20176 | 28246 | 23566 | S | 2 | N | Plant Opr II |  |
| Venice |  | 20487 | 29910 | 24288 | S | 5 | N | Plt Opr B |  |
| Vero Beach |  | 25231 | 33218 | 27142 | S | 14 | Y | Trt Pl Opr II |  |
| Winter Haven |  | 19032 | 26104 | 20769 | S | 10 | Y | W/WW Plt Opr B |  |
|  | Average | 20654 | 29451 | 25456 |  |  |  |  | 101 |



## FLORIDA LEAGUE OF CITIES

## COOPERATIVE SALARY SURVEY

## GROUP III:

Cities Under 10,000
Population
Florida League of Cities, Inc.
201 West Park Avenue
Post Office Box 1757
Tallahassee, Florida 32302-1757
(904) 222-9684

May 1994

## Group III Cities Under 10,000 Population Responding

Anna Maria ..... 1784)
Apalachicola ..... 2680
Archer ..... 1406
Atlantis ..... 1673
Avon Park ..... 8101
Bal Hartheur Village ..... 3033
Bay I Iarbor Istands ..... 472
lselleair ..... 398
Belleair Beach ..... 2090
Belleair Bluffs ..... 2221
Belleview ..... 305
Biscayne Park ..... 3081
Brademton beach ..... 1653
Brooksville ..... 7485
Bushnell ..... 2107
Cape Canaveral ..... 8100
Carrabelle ..... 1219
Chatlahoochee ..... 4334
chienand ..... 1997
Chipley ..... 3898
Clermont ..... 6904
Clewiston ..... 6154
Dade City ..... 5652
Defuniak Springs ..... 5082
Dundee ..... 2397
tagle lake ..... 1909
tatonville ..... 2513
Ragewood ..... 1102
Pellismere ..... 2279
Fernandina Beach ..... 9089
Hagler Beach ..... 3086
Horida City ..... 6067
Fon Mcade ..... 5241
Fruitland Park ..... 2830
Graceville ..... 2637
Cirecon Cove Springs ..... 4671
Gretna ..... 2015
Groveland ..... 2362
ciulf Brecze ..... 5740
Hialcah Gardens ..... 925
Highland Beach ..... 1716
Hillsboro Beach ..... 1716
Holmes Beach ..... 4892
Ilypoluxo ..... 117
Indian Beach Shores ..... 2366
Indian Rocks Beach ..... 3970
Indian Shores ..... 1 1任
Juno Beach ..... 2185
Kenneth City ..... 124)
Key Biscayne ..... 8897
Key Colony Beach ..... 1011
Keystone Ileights ..... 1311
1.ake Ifelen ..... 2374
l.ake Mary ..... 6426
lake Park ..... 6639
lake Placid ..... 1210
lake Walcs ..... 9759
Lantana ..... 8396
Lauderdale-By-The-Sea ..... 2974
Live Oak ..... 6334
tongboat Key ..... 6260
lynn llaven ..... 9757
Madeira Beach ..... 4251
Mailland ..... 8981
Malabar ..... 2147
Malone ..... 1442
Masconte ..... 1870
Melbourne Beach ..... 3090
Midway ..... 1118
Minneola ..... 1710
Moore llaven ..... 1537
Mi Dora ..... 7535
Mulberry ..... 3039
Neptune Beach ..... 7135
Newberry ..... 1885
North Bay Village ..... 555
Ocean Ridge ..... 1593
Okeechobec ..... 1910
Oldsmar ..... 8485
Orange City ..... 5734
Orange Park ..... 9418
Pahokec ..... 0,871
Palm Beach ..... (1)819)
Palan Beach shmes ..... or


In re: Application for a rate ) increase for Orange-Osceola Utilities, Inc. in Osceola County, and in Bradford, Brevard, Charlotte, Citrus, Clay, Collier, Duval, Highlands, Lake, Lee, Marion, Martin, Nassau, Orange, Osceola, Pasco, Putnam, Seminole, St. Johns, St. Lucie, Volusia, and Washington Counties by Southern States Utilities, Inc.

Docket No. 950495-WS

# Declassified <br> Confidential 

Cross Examination Exhibit $\qquad$

Excerpt from Hewitt Study: VP Finance \& Administration


FLED PURLS SEANCE COMMISSION


$$
\begin{aligned}
& \text { Declassified } \\
& \text { DOCUMENT SUMRER-DATE } \\
& 06570 \text { JUN } 18: \% \\
& \text { FPSC-RECOROS/REPORTING } \\
& X-R E F \quad 08006-96 \quad 7 / 31 / 96
\end{aligned}
$$



- M=MPDIAN;A=AVERAGE; WAmWHGHTED AVERAGR; R=RBGRESSION; 3RD=TIIRD OUARTILE


## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a rate ) increase for Orange-Osceola ) Utilities, Inc. in Osceola County, ) and in Bradford, Brevard, Charlotte, ) Citrus, Clay, Collier, Duval, Highlands, Lake, Lee, Marion, Martin, Nassau, Orange, Osceola, Pasco, Putnam, Seminole, St. Johns, St. Lucie, Volusia, and Washington Counties by Southern States Utilities, inc.

## Confidential

Cross Examination Exhibit $\qquad$

Calculation of 1994 Executive Bonuses


## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Application for a rate increase for Orange-Osceola |
| :---: |
| Utilities, Inc. in Osceola County, and in Bradford, Brevard, Charlotte, |
| Citrus, Clay, Collier, Duval, |
| Highlands, Lake, Lee, Marion, |
| Martin, Nassau, Orange, Osceola, |
| Pasco, Putnam, Seminole, St. Johns, |
| St. Lucie, Volusia, and Washington |
| Counties by Southern States |
| Utilities, Inc. |

Pasco, Putnam, Seminole, St. Johns, St. Lucie, Volusia, and Washington ) Counties by Southern States ) Utitites, Inc. , )

## Confidential

Cross Examination Exhibit $\qquad$

## SOUTHERN STATES UTILITIES, INC. <br> $\because \because--$ 1994 INCENTIVE COMPENSATION PLAN



DATE $3 / 24 / 94$


## SOUTHERN STATES UTILITIES, INC.

 Incentive Compensation Plan
## Incentive Pay Plan for 1994:

Designed to reward executives for working together to achieve joint goals in 1994.
Plan components will provide monetary reward for:

## Factor

50\%

50\%
2) Achieving targeted financial results from the sale of VGU.

Payments will be made in April, 1995 for 1994.
All participants will receive same rating for components 1) and 2) of plan.

## Performance Level

\% of Target Incentive Opportunity Earned

Target $100 \%$
Superior $\quad 75 \%$
Threshold 50\%
Below Threshold 0\%

Aggregate Awards will be limited to the following groups:
Vice Presidents 20\%
Assistant Vice President, Controller, Environmental Services Manager, Director Legal Service, and Director Rates 10\%

Performance level criteria for each component are defined as follows to facilitate computation of the award.

## Component 1

## Key Organizational Goals

- A\&G and O\&M expenses at or below $\$ 30,890,000$ budget.
- Update Customer Service Policy \& Procedure Manual.
- Conserve and protect natural resources by reducing unaccounted for water amounts by $5 \%$; providing conservation education and developing reuse projects. $\quad:-$.
\%
- Maintain a uniform rate structure for SSU.
- Reduce total companywide short term sick time to a total of 1,330 days for the year.
- Reduce companywide, nonexempt overtime to 36,000 hours or less. This represents an additional $3 \%$ reduction from 1994 budget, and a $9 \%$ overall reduction from the estimated 1993 overtime experience rate (adjusted for vacant positions).

Target Achievement of all key goals identified.
Superior Achievement of 5 key goals identified.
Threshold Attainment of the majority of goals identified.

## Component 2

Targeted Financial Results
Budgeted EPS From Sale of VGU - $\$ .35$ (Approx. $\$ 9.8 \mathrm{MM}$ after tax/28.3MM ave. shares)

Target $\quad 2 \%$ of Pay For Each $\$ .01$ Per Share Additional Gain
Threshold $100 \%$ of Budgeted EPS


[^0]:    1 Unless specifically noted otherwise, all of the information in this Part is for the combined postretirement medical, dental and death benefit programs.

    2
    The expected retum on assets of $\$ 0$ consists of an actual retum on assets of $\$ 40$ and an asset (gain) or loss of $\$ 40$.

[^1]:    Hewitt Associates LLC
    An international firm of consultants and actuaries specializing in the design, financing, communication, and administration of employee benet and compensation programs
    Adelaide * Amsterdam * Atlanta * Auckland * Bangkok * Bedminster - Boston * Brisbane * Brussels * Buenos Aires * Chathote * Chicago * Christchurch * Cleveland * Dallas * Davpen - Denver - Detroit * Dublin - Eindhoven * Geneva Houston - Lincolnshire - Los Angeles * Madrid * Melbourne * Mexico City * Milan * Milozakee *
    
     Wellington - Wiesbaden - The Woodlands * Zurich

[^2]:    * Represents a "reference point" position-data presented for reference only. This is not a benchmark position.

[^3]:    *Represents a "reference point" position-data presented for reference only. This is not a benchmark position.

[^4]:    - Represents a "reference point" position-data presented for reference only. This is not a benchmark position.
    ** Director Rates slotted into Grade 16; EMV was not used.

[^5]:    - M=MIDLAN; A=AVERAGE; $W=$ WERGHILD AVERAGE: R=RGGRSSION; 3RD=TIIRD OUARTIL

[^6]:    - M=MEDIAN: $A=A V E R A G E ; W=$ WEGGUTLD AVERAGE: R=RUBORESSION; 3RD=TYIRD QUARTILE

