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November 22, 1996

Ms. Blanca S. Mayo, Director
HAND DELIVERY
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
RE: Docket No. 951056-WS
Application for rate increase in
Flagler County by Palm Coast Utility Corporation

Dear Ms. Bayo:
Enclosed on behalf of Palm Coast Utility Corporation for filing in the above docket are an original and fifteen copies of:

1. Motion for Reconsideration
2. Request for Oral Argument

Please acknowledge receipt of the foregoing by stamping the enclosed extra copy of this letter and returning same to my attention. Thank you for your assistance.

Very truly yours,


Wayne L. Schiefelbein

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate increase in ) Flagler County by Palm Coast Utility ) Corporation

Docket No. 951056-WS
Filed: November 22, 1996

## MOTION FOR RECONSIDERATION

Palm Coast Utility Corporation (PCUC), requests reconsideration of Order No. PSC-96-1338-
FOF-WS ("the Order"), issued on November 7, 1996, for the purposes of calling to the Commission's attention three sets of computational errors and one evidentiary deficiency. The cumulative effect of the changes proposed by this motion are displayed on Attachment 11. In support hereof, PCUC states the following.

## A. FIRST SET OF

COMPUTATIONAL ERRORS:
THE APPROVED WATER RATES CANNOT GENERATE THE APPROVED WATER REVENUE REQUIREMENT.

1. The Order found (at p. 80) that a total revenue requirement for the water division is $\$ 5,094,035$. The Order further declares (at pp. 93-94) that the approved water rates are designed to produce annual operating revenues of $\$ 5,000,204$ for the water division, excluding any miscellaneous and reuse revenues. ${ }^{1}$ However, a review of the Commission Staff workpapers reveals that the rate design is intended to produce annual operating revenues of $\$ 5,000,204$, excluding any miscellaneous, reuse and bulk service contract revenues. In actuality, the approved water rates (at p. 109) are improperly designed and will produce only $\$ 4,726,281$, excluding any miscellaneous, reuse and bulk service contract revenues, resulting in a revenue shortfall of $\$ 273,923$. (See Att. 3.)
2. a) In designing water rates, exclusive of miscellaneous, reuse and bulk service revenues, Commission Staff first calculated the revenue for the Hammock Dunes bulk contract water rate, by applying an across-the-board percentage change in revenues and changing the existing base facility charge and gallonage charge for bulk water on an equal percentage basis. (See, generally, Order at p. 93

[^0]and Att. 1, p. 1.)
b) Commission Staff then determined the rate design for the remaining tariff charges by allocating the remaining revenue requirement over the factored Equivalent Residential Connections (ERCs) and gallons for the average test year. However, in doing so, Commission Staff did not remove the factored ERCs and gallons for Hammock Dunes. This "doubling up" results in the revenue requirement being spread over a larger number of ERCs and gallons than actually exist, causing both the base facility charge and gallonage charge to be too low.
c) To compound the problem, Commission Staff included in its factored gallons the actual test year gallons of $90,781 \mathrm{MG}$ for Hammock Dunes, rather than the $51,611 \mathrm{MG}$ (see Att. 1, p. 2) adjusted to reflect nonrecurring flushing. That adjustment to reflect nonrecurring flushing was accepted by the Commission for the water revenue calculation for Hammock Dunes and is in fact the amount used to calculate the Hammock Dunes water rates. (See Att. 1, p. 2 and Order at pp. 5859.)
d) In order to produce the $\$ 5,000,204$ approved by the Commission, the basic $5 / 8^{\prime \prime} \times 3 / 4^{\prime \prime}$ meter rate shown at p .109 of the Order needs to be increased from $\$ 12.53$ per month $+\$ 2.87$ per MG to $\$ 12.57$ per month $+\$ 3.17$ per MG. (See Att. 2, p. 1.)
e) The following supporting documents are included:
(i.) Att. 1, page 1 of 2 - Staff workpaper - Base Facility Charge and Gallonage Component Cost (supports Order pp. 93, 94 - (1) shows $\$ 5,000,204$ revenues for rate setting; (2) shows miscellaneous and bulk service excluded from revenue for rate setting; (3) shows Hammock Dunes rates separately calculated.)
(ii.) Att. 1, page 2 of 2 - Staff workpaper - *** Water ${ }^{* * *}$ - shows uncorrected Hammock Dunes bills and gallonage of $90,781 \mathrm{MG}$ included in gallons used to set rates.
(iii.) Att. 2, pages 1 and 2 - Corrected Staff workpapers in Att. 1 - (1) shows corrected bills and gallons with corrected rate calculation.
(iv.) Att. 3 - Verification of Revenue Production Using Rates From Order - shows that approved
rates cannot generate approved revenue requirement.
(v.) Att. 4 - Verification of Revenue Production Using Corrected Rates - shows that corrected rates do generate approved revenue requirement.
3. Thus, the Commission, in adopting the Commission Staff's recommendation, has inadvertently made a series of computational errors which are unsupported by the record or otherwise, and has erroneously determined that the approved water rates generate the approved water revenue requirement. As a result of the foregoing, there is a revenue shortfall of $\$ 273,923$. (See Att. 11.)

## B. SECOND SET OF COMPUTATIONAL ERRORS: THE USED AND USEFUL CALCULATION FOR WATER AND WASTEWATER LINES UNDERSTATES THE NUMBER OF OCCUPIED LOTS

4. a) PCUC requested a used and useful calculation based on an ERC-based methodology, so that such factors as customer density and the varying demands of residential, multi-family and general service customers would be appropriately recognized. This is explained in PCUC's brief, at pp. 37-44.
b) The Commission rejected that methodology and determined used and useful for lines using a "lot count" methodology. (Order, at pp. 38-43) While PCUC believes that this constitutes an error by the Commission, this motion is limited, for reconsideration purposes, to the fact that the Commission has committed errors even in its determination of used and useful on a "lot count" basis. That is to say, the actual number of connected lots recognized by the Commission on a "lot count" basis is understated, and there is insufficient record support for that element of the calculation adopted by the Commission.
5. a) The Commission determined used and useful percentages for water distribution and transmission mains, water services and wastewater gravity, PEP and force mains based on the ratio of connected lots to lots with service available. The source for the Commission's calculation was the testimony and exhibits of PSC Staff witness Amaya. Staff witness Amaya testified that she used
the lot count information from the system maps provided by PCUC. (T. 604, 606) ${ }^{2}$
b) Ms. Amaya's determination of the number of connected lots is not supported by the maps from which she drew her conclusions. ${ }^{3}$ Ms. Amaya has understated the number of connected water and wastewater lots and, as a result, the used and useful percentages in the Order, which relied on her determination, are also understated.
c) The used and useful percentages in the Order that are based on the "lot count" method are understated because, relying on Ms. Amaya's invalid count, they include a lot count of residential lots only in Palm Coast proper, and do not include connections to multi-family and general service customers or to beachside water customers.
6. The correct count of connections is properly determined from the average customer count for the test year. That customer count represents all customers connected, including multi-family, general

[^1]service and beachside water. The use of the average customer count is the method used by both PCUC and OPC to determine connected lots. The correct connected lot count, as determined by both PCUC and OPC, is 11,409 for Palm Coast and beachside water and 10,206 for Palm Coast gravity and PEP wastewater. (See Exh. 7 (FS-1), p. 103, Schedule E-3; and Exh. 25, (TLB 2 \& 3) revised $5 / 31 / 96$ )

Attachment 5, consisting of 4 pages, is a summary comparison of the appropriate corrections to the lot counts. It shows the lot counts and resulting used and useful percentages, as used in the Order, and the corrected amounts, together with the sources from the record for these corrections. Attachment 6, consisting of 7 pages, is a restatement of the rate base, cost of capital and operation statements from the Order, reflecting the effect of the corrected lot count. It also includes restatements of the Commission Staff's used and useful worksheets.
8. Failure to correct the lot counts as supported by the evidence results in an understatement of $\$ 142,213$ for water rate base and $\$ 27,348$ in water revenue. It also results in an understatement of $\$ 404,090$ for wastewater rate base and $\$ 63,743$ in wastewater revenue. (See Att. 11.)
C. THIRD SET OF COMPUTATIONAL ERRORS: FOUR ERRORS RESULT IN UNDERSTATED WATER AND/OR WASTEWATER RATE BASE
9. In its conversion from year-end rate base to average rate base (which PCUC believes to be improper), the Commission erred in determination of wastewater plant balances, as follows:
a) The average balance of Account 106.0, Undistributed Plant was excluded in its entirety. The yearend balance of this account is zero, but the 13 -month average balance is $\$ 173,869$ (See Exh. 7,(FS1) p. 12, Schedule A-6) The Commission Staff worksheet for Plant in Service shows that this adjustment was not made. This error results in Plant in Service being understated by $\$ 173,869$.
b) The average balance of Account 354.4, Treatment \& Disposal Structures and Improvements is
erroneous. The year-end balance of this account is $\$ 6,581,521$, before adjustments and $\$ 6,402,440$ after an adjustment to transfer $\$ 179,081$ for an oxidation basin train to Account 103.0, Future Use. That transfer is not reflected in the book balances for this account in the MFRs. The 13-month average balance for this account is $\$ 5,578,579$ before the adjustment to transfer the basin. The transfer took place in September, 1995. (See Exh. 7, (FS-1), p. 12, Schedule A-6) The adjustment, on a 13 -month average basis is $\$ 55,102$ ( $4 / 13 \times \$ 179,081$ ). The adjusted 13-month average balance is $\$ 5,523,477$ ( $\$ 5,578,579-\$ 55,102$ ). The Commission Staff workpapers show the adjusted 13 -month average balance to be $\$ 5,367,778$, an understatement of $\$ 155,699$. Attachment 7 shows the detail of the calculation.
c) The average balance of Account 103.0, Future Use is erroneous. The year-end balance of this account is zero, before adjustments, and $\$ 179,081$ after an adjustment to transfer $\$ 179,081$ for an oxidation basin train from Account 354.4. That transfer is not reflected in the book balances for this account in the MFRs. The 13 -month average balance for this account is $\$ 210,801$ before the adjustment to transfer the basin. The transfer took place in September, 1995. (See Exh. 7, (FS-1), p. 12, Schedule A-6) The adjustment, on a 13 -month average basis, is $\$ 55,102$ $(4 / 13 \times \$ 179,081)$. The adjusted 13 -month average balance is $\$ 265,903(\$ 210,801+\$ 55,102)$. The Commission Staff workpapers show the adjusted 13 -month average balance to be $\$ 210,801$, an understatement of $\$ 55,102$.
10. a) The Commission found it to be appropriate to impute contributions-in-aid-of-construction (CLAC) to partially offset the approved margin reserves. While PCUC believes that the decision to impute any CIAC constitutes an error by the Commission, this motion for reconsideration is limited to the dollar amount of the imputation.
b) The Commission imputed CIAC in the instant case using the system capacity charges proposed by PCUC in a companion docket (No. 951593 -WS): $\$ 1500$ per ERC for water and $\$ 1600$ per ERC for wastewater. This resulted in a CLAC imputation of $\$ 344,432$ for water and $\$ 849,939$ for wastewater. (Order, at p.20)
c) At the same October 16, 1996 agenda conference for the PCUC rate case, the Commission deferred consideration of PCUC's application for increased system capacity charges, when Commission Staff, which had filed a recommendation to deny the application in its entirety and to suspend PCUC's authority to collect any additional CLAC, determined that there may be merit to PCUC's Suggestion of Error.
d) The Commission subsequently addressed PCUC's application for increased system capacity charges on October 29, 1996, thirteen days after its vote on the rate case, and voted to approve a Staff Recommendation to increase PCUC's system capacity charges to $\$ 1500$ per ERC for water and $\$ 1390$ per ERC for wastewater. (Order forthcoming)
e) The Order in the instant case therefore overstates imputed CLAC for wastewater, net of imputed amortization, by $\$ 97,344$.
11. Attachment 8, consisting of three pages, shows: at page 1, a summary of the effect of the corrections on the plant balances; at page 2, the Staff Wastewater Plant in Service worksheet before adjustments; and at page 3, the Staff Wastewater Plant in Service worksheet after adjustments.
12. Attachment 9, consisting of 5 pages, is a restatement of the rate base, cost of capital and operation statements from the Order, reflecting the effect of the corrected computational errors.
13. The net effect of these four computational errors is to understate water and wastewater rate base by $\$ 18,338$ and $\$ 301,551$, respectively, and to understate water and wastewater revenue requirements by $\$ 6,227$ and 33,983 , respectively. (See Att. 11.)
D. EVIDENTIARY DEFICIENCY: THERE IS NO RECORD SUPPORT FOR THE COMMISSION'S NON-RECONCILIATION OF INVESTMENT TAX CREDITS (TTCs) TO RATE BASE.
14. The cost of capital calculations offered by PCUC and Public Counsel (OPC) and received in evidence support pro rata reconciliation of capital to rate base. PCUC's initial calculation is
displayed in its MFRs. (Exh. 7 (FS-1) pp. 86-87, Schedules D-1 and D-2; T. 182) OPC's calculation shows all items of capital, except customer deposits, reconciled to rate base. This reconciliation by OPC is applied to ITCs. (Exh. 26 (KHD-1), Schedule 2)
15. a) Under cross-examination by Commission Staff, PCUC witness Seidman was asked whether it was acceptable to include in capital structure, customer deposits, ITCs and deferred taxes that are specifically related to the requested rate base and reconcile any remaining difference on a pro rata basis. Mr. Seidman responded that this was appropriate "if they can be identified." (T. 223224)
b) There is no Commission rule requiring an applicant for a rate increase to specifically identify ITCs as being related to specific plant. ${ }^{4}$ Mr. Seidman was not asked to identify any specific ITCs. Commission Staff never proposed any ITCs with which Mr. Seidman could agree or disagree. No other witness either proposed not to reconcile ITCs or was cross-examined on the subject. The matter was simply dropped after Mr. Seidman's response.
c) Thus, there is no record support for the proposition that all ITC's are related to rate base.
d) In actuality, all ITCs are not related to rate base. In actuality, all ITCs cannot be identified with rate base: they are related to plant, some of which is in rate base and some of which is not, depending on the used and useful adjustments to such plant balances. These actualities are not, however, reflected in the record.
16. a) Commission Staff's recommendation inadequately informed the Commission on this issue. Commission Staff accurately reported that OPC did not state a specific position on the reconciliation element of this issue, but omitted the fact that OPC's analysis did, in fact, reconcile ITCs to rate base. Commission Staff accurately reported that Mr. Seidman testified that it is acceptable to include ITCs in capital structure that are specifically related to rate base and

[^2]reconcile any remaining difference pro rata over the investor sources of capital only, but omitted the fact that he actually testified that such general principle is appropriate if the ITCs can be identified. Commission Staff's recommendation omitted any mention of the total absence of record support to specifically identify such ITCs.
b) The Commission nonetheless made a finding that "a pro rata adjustment should not be applied to ITCs." (Order, at p. 55) The Commission failed to consider the lack of record support from which (i) to conclude that all ITCs are related to rate base; and (ii) to base this element of the Commission's reconcilation of capital to rate base.
c) The decision in this case to give full weight to ITCs in the cost of capital rather than prorating to rate base is inconsistent with the Commission's treatment of ITCs in PCUC's last rate case.
(See Order No. 22843, pp. 52 and 78.)
17. Based on the evidence, the only appropriate method to account for ITCs is to reconcile them to rate base along with all other components of capital, except customer deposits.
18. Attachment 10, consisting of 4 pages, is a restatement of the cost of capital and operation statements reflecting the reconciliation of ITCs to rate base.
19. Failure to reconcile ITCs to rate base results in a revenue shortfall of $\$ 121,384$ for water and $\$ 57,148$ for wastewater, based on the rate base approved by the Order. (See Att. 11.)

WHEREFORE, Palm Coast Utility Corporation requests the Commission to reconsider its decisions on the foregoing issues, and adjust rates accordingly.

Dated this 22nd day of November, 1996.


## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or *handdelivery to the following parties on this 22nd day of November, 1996:
*Stephen C. Reilly, Esq.
Associate Public Counsel Office of the Public Counsel
The Florida Legislature
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| Att. No. | Referenced At. Motion Paragraph: | Description |
| :---: | :---: | :---: |
| 1. | A.2.a,c,e | Staff Worksheets - Base Facility Charge and Gallonage Component Cost ( 2 pages) Uncorrected |
| 2. | A.2.d,e | Staff Worksheets - Base Facility Charge and Gallonage Component Cost (2 pages) Corrected |
| 3. | A.1.;2.e | Verification of Revenue Production Using Rates from Order |
| 4. | A.2.e | Verification of Revenue Production Using Corrected Rates |
| 5. | B. 7. | Summary Comparison of Corrections to Lot Counts (4 pages) |
| 6. | B. 7. | Restatement of Rate Base, Cost of Capital, Operation Statements and Staff Used and Useful Worksheets reflecting corrected lot count (7 pages) |
| 7. | C.9.c. | Detail of Correction to Adjustment to Account 354.4 |
| 8. | C. 11. | Summary of the Effect of Corrections to Computational Errors on Plant Balances, Rate Base and Revenue Requirements, including Staff Wastewater Plant in Service Worksheets before and after corrections (3 pages) |
| 9. | C. 12. | ```Restatement of Rate Base, Cost of Capital, and Operation Statements reflecting correction of computational errors (5 pages)``` |
| 10. | D. 18. | Calculation of Revenue Shortfall and Restatement of Rate Base, Cost of Capital, and Operation Statements reflecting ITC reconciliation to Rate Base (4 pages) |
| 11. | $\begin{aligned} & \text { Opening Par. } \\ & \& \text { A.3., B. } \\ & \text { C.13., D. } 19^{\prime} \end{aligned}$ | Cumulative Effect of Changes Proposed by Motion for Reconsideration |


| PALM COAST UTILTY CORPORATION <br> COUNTY: FLAGLER <br> DOCKET NO: 961056-WS <br> :TEST YEAR: YEAR ENDING: DECEMBER 31, 1886 <br> BASE FACILITY CHARGE COMPONENT CONSTRUCTION -WATER- | (CLASS A, B OR C WATER UTIUTY) |  |  | COMPONEN | FACTORED ERC'S FACTORED GALLONS NO. OF BIULS |  | $\begin{array}{r} 173,616 \\ 980,700 \\ 159,434 \\ \hline E R A \end{array}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  | EACIOBED GAICDSS |  |
|  | EERCENTASSIGNMENI |  |  | FACTORED ERC'S |  |  |  |  |
|  | TEST YEAR (Stafi) | BASE FACILITY CHARGE | GALIONAGE CHARGE | $\text { cost }{ }^{\text {FAC }}$ | SE LTY CHARGE | $\begin{aligned} & \text { GALLO } \\ & \text { COST } \end{aligned}$ | AGE CHARGE |
|  | 716,162 | 50\% | 50\% | 358.081 | 2.0525 | 358,081 | 0.3651 |
| (600.0) Salaries and Wages - Officers | 0 | 0\% | 100\% | 0 | 0.0000 | 0 | 0.0000 |
| (604.0) Employee Pensions and Benelits | 221,843 | 50\% | 50\% | 110,922 | 0.6389 | 110,922 | 0.1131 |
| (610.0) Purcnased Water | 0 | 0\% | 100\% | 0 | 0.0000 | 0 | 0.0000 |
| (615.0) Purchased Power | 228,310 | 0\% | 100\% | 0 | 0.0000 | 228,310 | 0.2328 |
| (618.0) Chemicals | 157,218 | 0\% | 100\% | 0 | 0.0000 | 157,218 | 0.1603 |
| (620.0) Materals and Suppies | 421,268 | 50\% | 50\% | 210,634 | 1.2132 | 210,634 | 0.2148 |
| (63X0) Contractual Services | 75,395 | 100\% | 0\% | 75,395 | 0.4343 | 0 | 0.0000 |
| (641.0) Rertal of Bullding/Real Property | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
| (842.0) Rertal of Equipmert | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
| (050.0) Transportation Expense | 45,453 | 50\% | 50\% | 2,727 | 0.1309 | 22,727 | 0.0232 |
| (699.0) insurance | 21.211 | 100\% | 0\% | 21,211 | 0.1222 | 0 | 0.0000 |
| (667.0) Regulatory Commission Expense | 18,086 | 100\% | 0\% | 18,086 | 0.1042 | 0 | 0.0000 |
| (676.0) Miscelaneous Expense | 0 | 50\% | 50\% | 0 | 0.0000 | 0 | 0.0000 |
| Total Expenses Pequired to Have Service Avalable: | 1,904,946 |  |  | 817.055 | 4.7061 | 1,087.891 | 1.1093 |
|  |  |  |  |  |  |  |  |
| (6SO) Services (neq | (214,917) | 42\% | 58\% | $(90,265)$ | (0.5862) | (124.852) | (0.1271) |
|  | 0 | 75\% | 25\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 75\% | 25\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 0\% | 100\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 50\% | 50\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 75\% | 25\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 75\% | 25\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 50\% | 50\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 50\% | 50\% | 0 | 0.0000 | 0 | 0.0000 |
| Total Cost of providing service, induding customer accounts: | (214,917) |  |  | (90, 265 | (0.5662) | (124,652) | (0.127] |
| Administratye |  |  |  |  |  |  |  |
| Acministration | 1,070,158 | 42\% | 58\% | 449,466 | 25889 | 620,692 | 0.6329 |
|  | 0 | 75\% | 25\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 75\% | 25\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 0\% | 100\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 50\% | 50\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 75\% | 25\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 75\% | 25\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 100\% | 0\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 0 | 50\% | 50\% | 0 | 0.0000 | 0 | 0.0000 |
|  | 1,070,158 |  |  | 449,486 | 2.5889 | 620,692 | 0.6329 |
| Depreciation and Amortiation: |  |  |  |  |  |  |  |
| (403.0) Depreciation | 834,551 | 100\% | 0\% | 834,551 | 4.8069 | 0 | 0.0000 |
| (407.0) Amortzation hegative) | (82,781) | 100\% | 0\% | (82.781) | (0.4768) | 0 | 0.0000 |
| Total Depreclation and Amortzation: | 751,770 |  |  | 751,770 | 4.3301 | 0 | 0.0000 |
| Taxss Other Than Income Taxes: |  |  |  |  |  |  |  |
| (408.10) Pegulatory Assessment Fees | 229,231 | 40\% | 60\% | 91,692 | 0.5281 | 137,539 | 0.1402 |
| (408.11) Property taxes | 150,328 | 100\% | 0\% | 150,328 | 0.8659 | 0 | 0.0000 |
| (408.12) Payroll Taxes | 115,491 | 47\% | 53\% | 54.666 | 0.3149 | 60.825 | 0.0620 |
| (408.13) Other Taxes and Lcenses | 5,459 | 50\% | 50\% | 2,730 | 0.0157 | 2,730 | 0.0028 |
| Total Taxes Other Than income Taxes: | 500,509 |  |  | 299,416 | 1.7246 | 201,093 | 0.2051 |
| INCOME TAXES: |  |  |  |  |  |  |  |
| (409.0) Federal, Sate, and Local income Taxes | 211.930 | 0\% | 100\% | 0 | 0.0000 | 211.930 | 0.2161 |
| TOTAL INCOME TAXES | 211,930 |  |  | 0 | 0.0000 | 211,930 | 0.2161 |
| FETURN ON INVESTMENT | 869,638 | 0\% | 100\% | 0 | 0.0000 | 869,638 | 0.8868 |
| TOTA L REVENUE REQUIREMENT | 5,094,034 |  |  | 2,227,442 | 12.7835 | 2,866,592 | 2.9230 |
| LESS: MISCELANEOUS REVENUES <br> LESS: BUK SERVICE CONTPACT REVENUES <br> total revenues for rate setting | $\begin{array}{r} (42,469) \\ (51,361) \\ \hline 5,000,204 \\ \hline \end{array}$ | $\begin{array}{r} 100 \% \\ 4 \% \\ \hline \end{array}$ | $\begin{array}{r} 0 \% \\ 96 \% \\ \hline \end{array}$ | $\begin{array}{r} (42,469) \\ (2,215) \\ \hline 2,182,758 \\ \hline \end{array}$ | $\begin{array}{r} (0.2446) \\ (0.0128) \\ \hline 1253 \\ \hline \end{array}$ | $\begin{array}{r} 0 \\ (49,145) \\ \hline 2,817,447 \\ \hline \end{array}$ | $\begin{array}{r} 0.0000 \\ (0.0501) \\ \hline 2.87 \end{array}$ |
|  |  |  |  |  | BASE FACILTY CHARGE |  | AL ONAGE CHARGE |
| Hammook Dunes Buk Ravenues |  |  |  |  |  |  |  |
| BFC Gallons | \$184.59 | 12 | 2215.0897 | 0.04312825 |  | $11$ |  |
|  | \$0.95 | 51611 | 49145.439 | 0.95687175 |  |  |  |  |
|  |  |  | 51360.529 |  |  |  |  |  |
| 951050W2.WK_ |  |  |  |  |  | Attachme | t No. 1 |

PALM COAST UTILITY CORPORATION


951058W2WK_

Attachment No.
Page 2 of 2
1180

| base facility charge COMPONENT CONSTRUCTION - WATER- |
| :---: |
| (6)T, Salaties andWages - Employees |
| (603.0) Salaries and Wages - Oricers |
| (604.0) Employee Pensions and Benefits |
| (610.0) Purchased Water |
| (615.0) Purchased Power |
| (618.0) Chemicals |
| (620.0) Matertals and Supplias |
| (63x.0) Contractual Services |
| (641.0) Rertal of Bullding/Real Property |
| (642.0) Rertal of Equlpment |
| (650.0) Transportation Expense |
| (659.0) Insurance |
| (667.0) Regutatory Commission Expense |
| (676.0) Misceltaneous Expense |
| Total Expenses Required to Have Service Avaikable: |
| Cost of groviding servee inciupha customer sccounts: |
| (690) Services (nat) |

(98) Services (net

Administrative

Depreciation and Amortzation:
(400.0) Depreciation
(407.0) Amortization (negative)
Total Depreciation and Amorization:
Taxes Other Than Income Taxes:
(408.10) Reguatory Assessment Fees
(408.11) Property taxes
(408.12) Pay oll Taxes
(408.13) Other Taxes and Licenses
Total Taxes Other Than Income Taxes:

## INCOME TAXES:

(409.0) Federal, State, and Local income Taxes

TOTAL INCONE TAKES
RETURN ON INVESTMENT
TOTAL REVENUE REQUIREMENT
LESS: MISCELLANEOUS REVENUES
LESS: BUK SERMCE CONTRACT REVENUES
TOTAL REVENUES FOR RATE SETTING

| 211,930 | 0\% | 100\% | 0 | 0.0000 | 211,930 | 0.2381 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 211,930 |  |  | 0 | 0.0000 | 211,930 | 0.2381 |
| 869,638 | 0\% | 100\% | 0 | 0.0000 | 869.638 | 0.9772 |
| 5,094,034 |  |  | 2,227,442 | 12.8297 | 2.866,592 | 3.2212 |
| $\begin{array}{r} (42,469) \\ (51,361) \\ \hline 5,000,204 \\ \hline \end{array}$ | $\begin{array}{r} 100 \% \\ 4 \% \\ \hline \end{array}$ | $\begin{array}{r} 0 \% \\ 96 \% \\ \hline \end{array}$ | $\begin{array}{r} (42,469) \\ (2,215) \\ \hline 2,182,758 \\ \hline \end{array}$ | $\begin{array}{r} (0.2455) \\ (0.0128) \\ \hline 1257 \end{array}$ | $\begin{array}{r} 0 \\ (49,145) \\ \hline 2,817,447 \end{array}$ | $\begin{array}{r} 0.0000 \\ (0.0552) \\ \hline 3.17 \end{array}$ |
|  |  |  |  | BASE CILITY HARGE |  | GALONAGE CHARGE |
| CORRECTED FOR OUNES ERCS and GALIONS |  |  |  |  |  |  |

Hammoox Dunes Buk Revenues
BFC

| Hammoox Dunes Buk Revenues | $\$ 184.59$ | 12 | 2215.0897 | 0.04312825 |
| :--- | ---: | ---: | ---: | ---: |
| BFC | $\$ 0.95$ | 51611 | 49145.439 | 0.95687175 |
| Gallons |  |  | 51360.529 |  |



081080W2 WK.

Attachment No. 2
$\qquad$ 2 1191

- Test Year Revenue Calculation
- For Average 1995 Customers

Company: Palm Coast Utility Corporation
Docket No.: 951056-WS
Projected Test Year Ended: 12/31/95
Water [ X ] Sewer []

VERIFICATION OF REVENUE PRODUCTION
USING RATES FROM ORDER
Results will differ slightly fromPSC Staff calculations
because rates used are rounded to two decimal places



Attachment No. $\qquad$
Page 1 of $\qquad$

Palm Coast Utility Corporation, Order No. PSC-96-1338-FOF-WS
Corrections to Lot Count on Order pages 38-44

| Water Dist. | Connected Lots <br> MR <br> Total <br> Total Lots <br> U\&U | Order | Customers, Palm Coas | Corrected | Source |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 10,415 |  | 10,532 | A |
|  |  | 767 |  | 767 |  |
|  |  | 11,182 |  | 11,299 |  |
|  |  | 46,764 |  | 46,764 |  |
|  |  | 23.91\% |  | 24.16\% |  |
| Water Trans. | Connected Lots | 10,415 | Cust. PC \& Beachside | 11,409 | B |
|  | MR | 767 |  | 767 |  |
|  | Total | 11,182 |  | 12,176 |  |
|  | Total Lots | 34,651 |  | 34,651 |  |
|  | U\&U | 32.27\% |  | 35.14\% |  |
| Services | Connected Lots | 10,415 | Cust. PC \& Beachside | 11,409 | B |
|  | MR | 767 |  | 767 |  |
|  | Total | 11,182 |  | 12,176 |  |
|  | Total Lots | 15,172 |  | 15,172 |  |
|  | U\&U | 73.70\% |  | 80.25\% |  |
| WW Gravity | Connected Lots | 8,175 | Customers less PEP | 8,925 | C |
|  | MR | 418 |  | 418 |  |
|  | Total | 8,593 |  | 9,343 |  |
|  | Total Lots | 25,062 |  | 25,062 |  |
|  | U\&U | 34.29\% |  | 37.28\% |  |
| PEP Lines | Connected Lots | 1,281 | PEP Customers | 1,281 | D |
|  | MR | 356 |  | 356 |  |
|  | Total | 1,637 |  | 1,637 |  |
|  | Total Lots | 21,376 |  | 21,376 |  |
|  | U\&U | 7.66\% |  | 7.66\% |  |

Sources for Corrected customer count:
A - Ex.7, FS-1, MFR Vol.I, page 103; Total avg minus fre protection and beachside (from Ex. 15 workpaper)
B - Ex.7, FS-1, MFR Vol.I, page 103; Total avg minus fire protection
C - Ex.7, FS-1, MFR Vol.I, page 103; Total avg minus PEP (see Note D)
D - Ex.15, Used and Useful Analysis, Table J

CORRECT.WK3


Palm Coast Uility Coreoration Used and Usetul Analysis - Water Calculation of ERC's

Exhes Workpapor ERC-W

| DESCRIPTION | 1990 | 1991 | 1892 | 1993 | 1994 | 1895 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| AESTOENTALL Customers (Average) | 7.780 | 8,346 | 8,902 | 9,482 | 10,257 | 11,031 |
| Consumption ( 4,000 Oal.) Regular lirkgation Construction | $\begin{array}{r} 395,3222 \\ 112,948 \\ 22,764 \\ \hline \end{array}$ | $\begin{array}{r} 393,547 \\ 68,028 \\ 12,044 \end{array}$ | $\begin{array}{r} 450,415 \\ 89,802 \\ 16,373 \\ \hline \end{array}$ | $\begin{array}{r} 406,065 \\ 124,000 \\ 17,128 \end{array}$ | $\begin{array}{r} 520,949 \\ 98,325 \\ 17,502 \\ \hline \end{array}$ | $\begin{array}{r} 562,901 \\ 109,672 \\ 17,716 \\ \hline \end{array}$ |
| Total | 831,032 | 474,219 | 356,620 | 638,093 | 636,776 | 600,288 |
| Ann. Cons./Cug. (Gal.) <br> Cons./Cust./Day - ERC | 88,256 187 | $\begin{array}{r} 58,827 \\ 150 \end{array}$ | $\begin{array}{r} 62,528 \\ 171 \end{array}$ | $\begin{array}{r} 67,296 \\ 184 \end{array}$ | $\begin{array}{r} 62,082 \\ 170 \end{array}$ | $\begin{array}{r} 82,577 \\ 171 \end{array}$ |
| GENERAL SERMCE <br> Consumption (1,000 Gal.) <br> Regular <br> Irrigaton | $\begin{aligned} & 65,353 \\ & 49,145 \\ & \hline \end{aligned}$ | $\begin{aligned} & 60,316 \\ & 28,396 \\ & \hline \end{aligned}$ | $\begin{array}{r} 72,298 \\ 35,285 \\ \hline \end{array}$ | $\begin{gathered} 92,281 \\ 63,678 \\ \hline \end{gathered}$ | $\begin{array}{r} 87,110 \\ 42,663 \\ \hline \end{array}$ | $\begin{array}{r} 88,831 \\ 45,883 \\ \hline \end{array}$ |
| Total | 114,498 | 97,711 | 107,681 | 146,857 | 129,883 | 132,894 |
| General Service - ERC | 1,677 | 1,719 | 1,721 | 2,167 | 2,089 | 2,120 |
| MULTI-FAMILY <br> Consumption (1,000 Gal.) Regular Irrigation | $\begin{array}{r} 31,124 \\ 24,716 \\ \hline \end{array}$ | $\begin{aligned} & 32,022 \\ & 17,490 \\ & \hline \end{aligned}$ | $\begin{array}{r} 33,278 \\ 19,059 \\ \hline \end{array}$ | $\begin{array}{r} 34,178 \\ 19,545 \\ \hline \end{array}$ | $\begin{aligned} & 40,909 \\ & 13,908 \\ & \hline \end{aligned}$ | $\begin{aligned} & 38,254 \\ & 16,683 \\ & \hline \end{aligned}$ |
| Total | 68,840 | 49.618 | 52,337 | 53,721 | 54,815 | 54,937 |
| Muti-Family - ERC | 818 | 871 | 837 | 798 | 883 | 878 |
| Total ERC's w/o DCDD | 10,275 | 10,935 | 11,460 | 12,447 | 13,229 | 14,029 |
| 0 ODO Consumption (1,000 Gal.) DCDD ERC | $\begin{array}{r} 17,377 \\ 255 \end{array}$ | $\begin{array}{r} 43,138 \\ 759 \end{array}$ | $\begin{array}{r} 50,768 \\ 812 \end{array}$ | $\begin{array}{r} 95,704 \\ 1,422 \end{array}$ | $\begin{array}{r} 99,221 \\ 1,598 \end{array}$ | $\begin{array}{\|l\|} \hline(A) \\ 51,100 \\ 817 \end{array}$ |
| TOTAL AVERAGE ERCs | 10,530 | 11,694 | 12,272 | 13,869 | 14,827 | 14,846 |


| $\begin{aligned} & \text { Beachidde ERC'A } \\ & \text { OCDD } \\ & \text { Boach (Residentla) } \end{aligned}$ | 817 <br> 877 |
| :---: | :---: |
| Beachside ERC's Total | 1.894 |



Attachment No. $\qquad$

$\qquad$



| PALM COAST UTILITTY CORPORATION STATEMENT OF WATER OPERATIONS test year ended 12/31/95 | CORRECT LOT COUNT |  |  |  |  |  | schedule no. 3-A DCCKET NO. 951056-ws |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| DESCRIPTION |  | $\begin{aligned} & \text { TEST YEAR } \\ & \text { PER UTLITY } \\ & 1995 \end{aligned}$ | UTLITY ADJUSTMENTS | AD.JUsted TEST YEAR/ UTLLITY 1995 | COMMASSION ADJUSTMENTS | COMMISSION AD.NSTED TEST YEAR | revenue increase | REVENUE REQUIREMENT |
| 1 OPERATING REVENUES | \$ | 5,384,699 \$ | 1,586,948 \$ | 6,971,647 \$ | $(1,571,283)$ | 5,400,364 \$ | (278,981) $\ddagger$ | 5,121,383 |
| OPERATNG EXPENSES: |  |  |  |  |  |  | -5.17\% |  |
| 2 OPERATION AND MAINTENANCE | \$ | 3,026,338 \$ | (22,018)\$ | 2,804,320 \$ | ( 44,132 ) \$ | 2,760,188 \$ | \$ | - 2,760,188 |
| 3 depreciation |  | 1,621,374 | $(437,104)$ | 1,184,270 | $(346,241)$ | 838,029 |  | 838,029 |
| 4 AMORTIZATION |  | (82,781) | $(5,469)$ | $(88,250)$ | 5,469 | $(82,781)$ |  | $(82,781)$ |
| 5 TAXES OTHER THAN INCOME |  | 874,220 | $(180,899)$ | 693,321 | $(177,422)$ | 515,899 | $(12,554)$ | 503,344 |
| 6 InCOME TAXES |  | $(289,553)$ | 781,183 | 491,630 | $(175,174)$ | 316,456 | $(100,257)$ | 216,199 |
| 7 TOTAL OPERATING EXPENSES | \$ | 5,149,598 \$ | $(64,307) \$$ | 5,085,291 \$ | (737,500)\$ | 4,347,791 \$ | (112,811)\$ | 4 4,234,980 |
| 8 OPERATNG INCOME | \$ | 235,101 \$ | 1,651,255 \$ | 1,886,356 \$ | (833,783)\$ | 1,052,573 \$ | $(166,171)$ \$ | \$886,402 |
| 9 RATE BASE | \$ | 23,702,639 | \$ | 21,328,434 |  | * 11,151,425 |  | \$ 11,151,425 |
| RATE OF RETURN |  | 0.99\% |  | 8.84\% |  | 9.44\% |  | 7.95\% |




| Ireatrnent |
| ---: |
| Plant |
| 334 |
| 2.329 |
| 243428 |
|  |
| $5,125,170$ |


| conection Plant | Iotal |
| :---: | :---: |
| 1.238 |  |
| 774 |  |
| 256450 |  |
| 22,423,871 |  |
| 2,603,188 |  |
| 25027059 |  |
| 256.450 | 849 |


|  |  |  |  | ratio of | Mon- used \& usef ul plant to plant | 55.27\% |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| F.M. | 4418086 | 00.90\% | 3.003,334 |  |  |  |
| Gravily | 22184181 | 37.28\% | 8.270.162 |  |  |  |
| PEP Malk | 5680279 | 7.00\% | 434,160 |  |  |  |
| PEP Tante | 2050021 | 100.00\% | 2050021 |  |  |  |
| Total | 34323347 | 40.34\% | 1384767 |  |  |  |
| COARECT | OTCOUNT |  |  |  |  |  |

Palm Coast Utility Corporation
Detail of Correction to Adjustment to Account 354.4
Per Staff Workpapers Supporting Order No. PSC-96-1338-FOF-WS

Account 354.4, per PSC
$\begin{array}{lll}\text { Y/E Bal } & 13 \mathrm{Mo} \text {. Adj } & \text { Adjusted } \\ 6,402,440 & (1,034,662) & 5,367,778\end{array}$

Calculation of Account 354.413 month average should be is as follows:
[From Ex. 7, FS-1, MFR Vol. I., p. 12 \& 13]

|  |  | Per <br> Books [Before Adj] | Transfer * Ox. Basin | After Adjustment |
| :---: | :---: | :---: | :---: | :---: |
|  | Dec '94 | 4,408,479 | 0 | 4,408,479 |
|  | Jan '95 | 4,408,479 | 0 | 4,408,479 |
|  | Feb | 4,408,479 | 0 | 4,408,479 |
|  | Mar | 4,408,479 | 0 | 4,408,479 |
|  | Apr | 4,408,479 | 0 | 4,408,479 |
|  | May | 4,408,479 | 0 | 4,408,479 |
|  | Jun | 6,581,521 | 0 | 6,581,521 |
|  | Jul | 6,581,521 | 0 | 6,581,521 |
|  | Aug | 6,581,521 | 0 | 6,581,521 |
|  | Sep | 6,581,521 | $(179,081)$ | 6,402,440 |
|  | Oct | 6,581,521 | $(179,081)$ | 6,402,440 |
|  | Nov | 6,581,521 | $(179,081)$ | 6,402,440 |
| Year End Balance: | Dec | 6,581,521 | $(179,081)$ | 6,402,440 |
|  | 13 Mo. Avg | 5,578,579 | $(55,102)$ | 5,523,477 |
| PSC 13 Mo Avg Balance |  |  |  | 5,367,778 |
| PSC has understated Acct 3 | by: |  |  | 155,699 |

* Per Ex. 7, MFR Vol. I, p. 12 \& 13, an oxidation basin train was transferred from Account 354.4 to Plant Held for Fututre Use in Sept, 1995. The MFR was based on actual balances through 6/95 and projected balances for 7-12/95. The projected balances do not reflect the transfer of the trains, so it was included as an adjustment to the year end balances. The above calculation correctly reflects the 13 month average of the transfer made in 9/95.

Palm Coast Utility Corporation
Summary of the Effect of Computational Error Corrections on Plant Balances, Rate Base and Revenue Requin ements




[^3]| PALK coase 0 gifigy conporagion <br>  PEAETEAR EMDED 12/31/95 |  | MATE ERRORS CORRECTED |  |  | BCExDULE Mo. 1-A DOCxET WO. 952056-ws |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| COMPONENT |  | TEST YEAR PER UTILITY YEAR-END | UTILTY ADJUSTMENTS | ADJUSTED TEST YEAR PER UTIUTY | COMMISSION <br> ADJUSTMENTS | COMMISSION AD. AVERAGE TEST YEAR |
| 1 UTILITY PLANT IN SERVICE | \$ | 63,505,519 \$ | (2,128,199)\$ | 61,377,320 \$ | \$ $(1,089,914) \$$ | 60,287,406 |
| 2 LAND \& LAND RIGHTS |  | 504,632 | 0 | 504,632 | 0 | 504,632 |
| 3 NON-USED \& USEFUL COMPONENTS |  | $(8,602,553)$ | 0 | $(8,602,553)$ | $(10,464,761)$ | $(19,067,314)$ |
| 4 CWP |  | 3,992,210 | (3,992,210) | 0 | 0 | 0 |
| 5 ACCUMULATED DEPRECIATION |  | $(20,996,438)$ | 1,074,065 | $(19,922,373)$ | 938,154 | $(18,984,219)$ |
| 6 CIAC |  | $(16,390,083)$ | 0 | $(16,390,083)$ | 1,027,079 | $(15,363,004)$ |
| 7 AMORTIZATION OF CIAC |  | 3,241,580 | 0 | 3,241,580 | $(246,931)$ | 2,994,649 |
| 8 NET DEBIT DEFERRED TAXES (USED) |  | 1,119,911 | 0 | 1,119,911 | $(464,511)$ | 655,400 |
| 9 |  | 0 | 0 | 0 | 0 | 0 |
| 10 ADVANCES FOR CONSTRUCTION |  | (2,672,139) | 2,672,139 | 0 | 0 | 0 |
| 11 WORKING CAPITAL ALLOWANCE |  | 0 | 0 | 0 | 0 | 0 |
| 12 OTHER |  | 0 | 0 | 0 | 0 | 0 |
| RATE BASE | \$ | 23,702,639 \$ | (2,374,205)\$ | 21,328,434 \$ | ( $10,300,884$ )\$ | 11,027,550 |

Attachment No.
Page $L$ of $S-1:$
-


Attachment No. of $\qquad$ $c)$


| PALM COAST UTILITY CORPORATION STATEMENT OF WATER OPERATIONS TEST YEAR ENDED 12/31/95 |  |  | MATH ERRORS CORRECTED |  |  |  | SCHEDULE NO. 3-A <br> DOCRET NO. 951056-wS |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| DESCRIPTION |  | TEST YEAR PER UTILITY 1995 | UTLITIY ADJUSTMENTS | ADMSTED TEST YEAR/ UTLITY 1995 | COMMISSION ADJUSTMENTS | COMMASSION ADUSTED TEST YEAR | REVENUE IMCREASE | REVENUE REQUIREMENT |
| 1 OPERATING REVENUES | \$ | 5,384,699 \$ | 1,586,948 \$ | 6,971,647 \$ | $(1,571,283) \$$ | 5,400,364 \$ | $(300,102) \$$ | 5,100,262 |
| OPERATING EXPENSES: |  |  |  |  |  |  | -5.56\% |  |
| 2 OPERATION AND MAINTENANCE | \$ | 3,026,338 \$ | $(222,018) \$$ | 2,804,320 \$ | $(44,132) \$$ | 2,760,188 \$ | \$ | 2,760,188 |
| 3 DEPRECIATION |  | 1,621,374 | $(437,104)$ | 1,184,270 | $(349,719)$ | 834,551 |  | 834,551 |
| 4 AMORTIZATION |  | $(82,781)$ | $(5,469)$ | $(88,250)$ | 5,469 | $(82,781)$ |  | $(82,781)$ |
| 5 TAXES OTHER THAN INCOME |  | 874,220 | $(180,899)$ | 693,321 | $(179,028)$ | 514,293 | $(13,505)$ | 500,788 |
| 6 INCOME TAXES |  | $(289,553)$ | 781,183 | 491,630 | $(170,601)$ | 321,029 | $(107,847)$ | 213,182 |
| 7 TOTAL OPERATING EXPENSES | \$ | 5,149,598\$ | $(64,307) \$$ | 5,085,291 | $(738,011) \$$ | 4,347,280 \$ | ( 121,351 ) \$ | 4,225,929 |
| 8 OPERATING INCOME | \$ | 235,101 \$ | 1,651,255 \$ | 1,886,356 \$ | $(833,272) \$$ | 1,053,084 \$ | $(178,751) \$$ | 874,333 |
| 9 RATE BASE | \$ | 23,702,639 | \$ | 21,328,434 | \$ | * 11,027,550 | \$ | 11,027,550 |
| RATE OF RETURN |  | 0.99\% |  | 8.84\% |  | 9.55\% |  | 7.93\% |



Docket No. 951056-WS Filed: November 22, 1996

## REQUEST FOR ORAL ARGUMENT

Palm Coast Utility Corporation hereby requests that it be allowed to address the Commission on Palm Coast Utility Corporation's Motion for Reconsideration in the above docket, which is filed concurrently with this Request. oral argument would assist the Commission to evaluate the complex issues addressed in said Motion, with Counsel available to answer any questions the Commission may have.

DATED this 22 nd day of November, 1996.
Respectfully submitted,
Wayne L. Schiefelbein
Gatlin, Woods \& Carlson
l709-D Mahan Drive
Tallahassee, Florida 32308
(904) 877-7191
Attorneys for
PALM COAST UTILITY CORPORATION

Dockitw memento
12544 1001220


## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or *hand-delivery to the following parties on this 22nd day of November, 1996.
*Stephen C. Reilly, Esq.
Associate Public Counsel Office of Public Counsel
The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
*Bobbie Lee Reyes, Esq.
Division of Legal Services
Florida Public Service Commission
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Wayne L. Schiefelbein


[^0]:    ${ }^{1}$ See also September 26,1996 Staff Recommendation, at p. 176

[^1]:    2 According to Ms. Amaya's exhibits, as of October, 1995 (the date of the maps), there were 10,415 connected water lots and 9,456 connected wastewater lots (see Exh. 28 (KAA-2), pp. $1 \& 3$ ). The Commission used these numbers in its determination of used and useful. (Order, pp. 73, 74, 77, 78)

    3 The maps in this record were filed in compliance with Rule 25-30.440, F.A.C. The rule requires that an applicant for a rate increase submit:
    (1) A detailed map showing:
    a) The location and size of the applicant's distribution and collection lines as well as its plant sites, and
    b) The location and respective classification of the applicant's customers.

    PCUC complied with this requirement in its Minimum Filing Requirements (MFRs) filed on December 27, 1995.

    Separate system maps were provided for water and wastewater and what the maps actually show can be summarized as follows. For each system, platted lots were identified and the number of connected residential lots was totalled and annotated on each map sheet. However, the number of connected multi-family and general service customers was not totalled and shown. For the beachside water system, the connected lot count is not annotated.

    The lot count for connected lots used by Ms. Amaya in her exhibits and calculations is the lot count for connected residential only and does not include lots for general service, multi-family or beachside water customers.

    The maps were not filed for the purpose of providing a lot count to be utilized in used and useful calculations nor do the rules require that they be prepared for such a purpose. Ms. Amaya's failure to account for general service, multifamily or beachside water customers is not a result of PCUC not providing information required by the Commission rules.

[^2]:    4 Nor is there any commission rule requiring such applicant to specifically identify debt or equity as being related to specific plant. Given the cost-prohibitive nature of such micro-accounting, such capital items are prorated and reconciled to rate base.

[^3]:    $\infty$
    $\cdots$
    $\cdots$
    $\cdots$
    $\cdots$

