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ORIGINAL  
FILE 687

January 24, 1997

**HAND DELIVERY**

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-1850

RE: Docket No. 951056-WS  
Application by PALM COAST UTILITY CORPORATION  
for a rate increase in Flagler County, Florida

Dear Ms. Bayo:

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

- 1) Amended Motion for Reconsideration or, Alternatively, Motion to Correct Computational Errors; and - 00969-97 - 1/24/97
- 2) Request for Oral Argument. - 00970-97 -

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,

*B. Kenneth Gatlin*

B. Kenneth Gatlin

ACK \_\_\_\_\_  
 AFA \_\_\_\_\_  
 APP \_\_\_\_\_  
 DAF \_\_\_\_\_  
 GMAJ \_\_\_\_\_  
 GTR \_\_\_\_\_  
 BKG/met  
 Enclosures  
 EG \_\_\_\_\_  
 IN \_\_\_\_\_  
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00969-97

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate ) Docket No. 951056-WS  
increase in Flagler County by )  
PALM COAST UTILITY CORPORATION ) Filed: January 24, 1997

AMENDED MOTION FOR RECONSIDERATION  
OR, ALTERNATIVELY, MOTION TO CORRECT COMPUTATIONAL ERRORS

Palm Coast Utility Corporation (PCUC), files this its amended motion for reconsideration of Order No. PSC-96-1338-FOF-WS (the Order), or, alternatively, motion to correct computational errors, for the purpose of calling to the Commission's attention significant staff computational errors not addressed in PCUC's original Motion for Reconsideration, and states:

RECONSIDERATION

1. This amended motion for reconsideration is filed pursuant to Rule 25-22.035(3), F.A.C., and Rule 1.190, Fla.R.Civ.P.

2. PCUC realleges each and every allegation in its motion for reconsideration, filed herein on November 22, 1996.

3. PCUC has discovered an additional set of staff computational errors which have a substantial impact on the

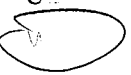
ACK \_\_\_\_\_ financial integrity of PCUC, by understating water rate base by  
AFA \_\_\_\_\_  
APP \_\_\_\_\_ \$2,454,294, water revenue requirement by \$301,373, and wastewater  
CAF \_\_\_\_\_ revenue requirement by \$113,861.  
CMU \_\_\_\_\_

CTR \_\_\_\_\_ 4. Commission staff developed certain schedules and  
EAG \_\_\_\_\_ workpapers after the agenda conference so that the Order would

LEG 1 \_\_\_\_\_  
LIN 3 \_\_\_\_\_ correctly reflect the Commission's decision. PCUC has further

OPC \_\_\_\_\_ examined those voluminous staff workpapers, which were made

RCH \_\_\_\_\_  
SE 1 \_\_\_\_\_ available to PCUC after the Order was issued, and discovered the



0000

00009

FFSC-REG/DOC/REPORTING

following substantial errors:

a. Schedule 1-A, Schedule of Water Rate Base (Order at p. 102) at line 3 of the far right column shows \$(19,067,314) as the Non-Used & Useful Components for the Commission Adjusted Average Test Year. (See Att. A1)

b. That figure is supported by schedules in Staff's electronic spreadsheet pcucfin.wk3. Schedule A-7 of electronic spreadsheet pcucfin.wk3 is the Non-Used and Useful Summary. It shows the non-used and useful adjustments for Water Plant and Water Accumulated Depreciation to be \$(29,279,207) and \$8,669,753, respectively, and shows the total non-used and useful adjustment for water rate base to be \$(19,067,314), in agreement with Schedule 1-A of the Order. (See Att. A2)

c. Supporting Schedule A-7 is an unnumbered schedule in electronic spreadsheet pcucfin.wk3 entitled "PLANT, ETC & USED AND USEFUL ADJUSTMENTS" for WATER UTILITY PLANT ACCOUNTS. (See Att. A3) The source for the non-used and useful adjustments to water plant and accumulated depreciation in Schedule A-7 is the line labeled TOTALS-WATER in the columns labeled NON-U/U Adj. to Plant and NON-U/U Adj. to Acc. Depr. Those totals are the sums of the six rows immediately above the totals and are reproduced here:

	NON-U/U Adj. to <u>Plant</u>	NON-U/U Adj. to <u>Acc. Depr.</u>
INTANGIBLE PLANT	0	0
SOURCE OF SUPPLY & PUMPING	\$2,614,143	\$1,116,112

WATER TREATMENT PLANT	1,973,874	556,664
TRANSMISSION & DISTRIBUTION	19,450,204	6,788,497
GENERAL PLANT	2,660,042	118,684
OTHER	2,580,944	89,797
TOTALS - WATER	\$29,279,207	\$8,669,753
	=====	=====

d. The above totals by plant groupings are supposed to equal the sum of the primary account totals preceding them in Att. A3. THEY DO NOT. The totals in GENERAL PLANT actually equal the sum of the GENERAL PLANT accounts plus the OTHER accounts. That is, the amounts in the OTHER accounts are added twice, such that the total non-used adjustments are overstated by \$2,580,944 for water plant and \$89,797 for water accumulated depreciation. These errors occurred because the formulas used to determine the GENERAL PLANT totals erroneously add both GENERAL PLANT accounts and OTHER accounts, instead of just GENERAL PLANT accounts. This is not an obvious error that would be noticed in the normal course of reviewing a staff worksheet for the purpose of determining whether it reflects the Commission's vote on used and useful methodology.

e. The corrected totals for water plant and accumulated depreciation are \$(26,698,263) and \$8,579,956, respectively. (See Att. A4) The corrected total non-used and useful adjustment for water rate base is \$(16,576,167). See corrected Schedule A-7. (Att. A5)

5. The mathematical errors result in an understated water rate base of \$2,454,294, understated water revenue requirement of \$301,373 and understated wastewater revenue requirement of \$13,861.

(See Att. A8 & A9) These understatements reflect not only the correction of the mathematical errors in non-used and useful adjustments to water plant and accumulated depreciation, but also the resulting fallout changes to the used water debit deferred taxes component of rate base and the cost of capital. The used water debit deferred taxes is a function of used water plant. The cost of capital, which is used to determine the return on both water and wastewater rate base, increased from 7.90% to 8.10% because the Commission found that the ITC component of capital should be specific and not be adjusted to rate base on a pro rata basis [Order at page 55]. Corrected schedules are included as follows:

- Att. A6 - corrected Schedule 1-A, Water Rate Base
- Att. A7 - corrected Schedule 2, Capital Structure
- Att. A8 - corrected Schedule 3-A, Statement of Water Operations (including a summary of the impact of the computational errors)
- Att. A9- corrected Schedule 3-B, Statement of Wastewater Operations (including a summary of the impact of the computational errors)

6. Accordingly, PCUC requests that the Commission allow and grant this amended motion for reconsideration in furtherance of justice, and that the Commission's final order reflect the corrections.

ALTERNATIVE MOTION TO CORRECT COMPUTATIONAL ERRORS

7. Given the continued pendency of PCUC's original Motion for Reconsideration, there is no question that the Order remains under the control of the Commission.

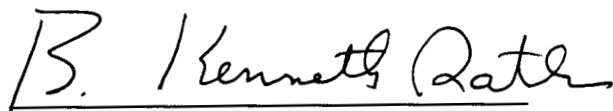
8. The Commission has the inherent power to reconsider or amend "final" orders still under its control. The exercise of this power is particularly appropriate where mistake or inadvertence is shown.

9. PCUC has hereinabove clearly shown mistake or inadvertence in the above computational errors, which result in a substantial understatement of water rate base and water revenue requirement. The extent of these errors should be deemed an extraordinary circumstance warranting corrections in the rate base, cost of capital, revenue requirement and rates established by the Order.

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

DATED this 24th day of January, 1997.

Respectfully submitted,

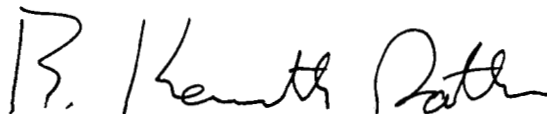


B. Kenneth Gatlin  
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1709-D Mahan Drive  
Tallahassee, Florida 32308  
(904) 877-5609

Attorneys for  
PALM COAST UTILITY CORPORATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery to Ms. Bobbie Reyes, Esquire, Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399-0850, to Mr. Stephen C. Reilly, Associate Public Counsel, Office of Public Counsel, Claude Pepper Building, Room 812, 111 West Madison Street, Tallahassee, Florida 32399-1400, and to Mr. Richard Melson, Esquire, Hopping Green Sams & Smith, 123 South Calhoun Street, Tallahassee, Florida 32314, and by U.S. Mail to Mr. Albert J. Hadeed, County Attorney, 1200 East Moody Boulevard, #11, Bunnell, Florida 32110-9764, and to Mr. Arthur L. Sirkin, c/o County Attorney, 1200 East Moody Blvd., #11, Bunnell, Florida 32110, on this 24th day of January, 1997.



B. Kenneth Gatlin

AMENDED MOTION FOR RECONSIDERATION  
OR ALTERNATIVELY  
MOTION TO CORRECT COMPUTATIONAL ERRORS

ATTACHMENTS

<u>ATT. NO.</u>	<u>Description</u>
A1	Schedule A-1, Schedule of Water Rate Base from Order No. PSC-96-1338-FOF-WS at page 102. <u>Uncorrected</u>
A2	Schedule A-7 of Staff electronic spreadsheet pcucfin.wk3, Non-Used and Useful Summary. <u>Uncorrected</u>
A3	Unnumbered schedule of Staff electronic spreadsheet pcucfin.wk3 Plant, Etc. & Used and Useful Adjustments for Water Utility Plant Accounts. <u>Uncorrected</u>
A4	Unnumbered schedule of Staff electronic spreadsheet pcucfin.wk3 Plant, Etc. & Used and Useful Adjustments for Water Utility Plant Accounts. <u>Corrected</u>
A5	Schedule A-7 of Staff electronic spreadsheet pcucfin.wk3 Non-Used and Useful Summary. <u>Corrected</u>
A6	Schedule A-1, from Order No. PSC-96-1338-FOF-WS at page 102. <u>Corrected</u>
A7	Schedule No.2, Capital Structure, from Order No. PSC-96-1338-FOF-WS. <u>Corrected</u>
A8	Schedule No.3-A, Statement of Water Operations, from Order No. PSC-96-1338-FOF-WS. <u>Corrected</u> . Includes a summary of the impact of the computational errors.
A9	Schedule No.3-B, Statement of Wastewater Operations, from Order No. PSC-96-1338-FOF-WS. <u>Corrected</u> . Includes a summary of the impact of the computational errors.



PALM COAST UTILITY CORPORATION SCHEDULE OF WATER RATE BASE TEST YEAR ENDED 12/31/95			SCHEDULE NO. 1-A DOCKET NO. 951056-WS			
COMPONENT	TEST YEAR PER UTILITY YEAR-END	UTILITY ADJUSTMENTS	ADJUSTED TEST YEAR PER UTILITY	COMMISSION ADJUSTMENTS	COMMISSION ADJ. 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 CWIP	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	(482,849)	637,062	
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	
<b>RATE BASE</b>	<b>\$ 23,702,639</b>	<b>(2,374,205)</b>	<b>\$ 21,328,434</b>	<b>(10,319,222)</b>	<b>11,009,212</b>	

PALM COAST UTILITY CORP NON-USED AND USEFUL SUMMARY	Sched A-7		
	AMOUNT	AMOUNT	ADJUST
	PER UTILITY	PER STAFF	PER STAFF
<b>WATER</b>			
PLANT	(13,615,786)	(29,279,207)	(15,663,421)
LAND	0	0	0
ACCUMULATED DEPRECIATION	3,896,893	8,669,753	4,772,860
CIAC	1,319,118	1,899,848	580,730
ACCUMULATED AMORT CIAC	(202,778)	(357,709)	(154,931)
ADVANCES FOR CONSTRUCTION	0	0	0
OTHER	0	0	0
<b>TOTAL NON-USED AND USEFUL</b>	<b>(8,602,553)</b>	<b>(19,067,314)</b>	<b>(10,464,761)</b>
NON-USED AND USEFUL DEPR EXP	296,334	664,949	368,615
NON-USED AND USEFUL AMORT EXP	30,675	60,548	29,873
NET ADJUSTMENT-WATER	(265,659)	(604,401)	(338,742)
PROPERTY TAX EXPENSE-GROSS (Sch B-15)	290000	290000	0
Ratio of non-used plant to total (per staff)		48.16%	
Non-used property tax	31352	139,672	(108,320)
<b>WASTEWATER</b>			
PLANT	(20,225,569)	(31,106,873)	(10,881,304)
LAND	0	0	0
ACCUMULATED DEPRECIATION	6,759,615	10,250,580	3,490,965
CIAC	43,537,577	43,599,174	61,597
ACCUMULATED AMORT CIAC	(11,299,063)	(10,895,217)	403,846
ADVANCES FOR CONSTRUCTION	0	0	0
OTHER	0	0	0
<b>TOTAL NON-USED AND USEFUL</b>	<b>18,772,560</b>	<b>11,847,664</b>	<b>(6,924,896)</b>
NON-USED AND USEFUL DEPR EXP	587,624	932,521	344,897
NON-USED AND USEFUL AMORT EXP	1,060,447	1,094,039	33,592
NET ADJUSTMENT-WASTEWATER	472,823	161,519	(311,304)
PROPERTY TAX EXPENSE-GROSS (Sch B-15)	210,000	210000	0
Ratio of non-used plant to total (per staff)		56.47%	
Non-used property tax	66,329	118,596	(52,267)

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Attachment No. A2Page 1 of 1





PALM COAST UTILITY CORP NON-USED AND USEFUL SUMMARY	<u>Sched A-7</u>		
	AMOUNT PER UTILITY	AMOUNT PER STAFF	ADJUST PER STAFF
<b>WATER</b> <span style="float:right"><u>[CORRECTED]</u></span>			
PLANT	(13,615,786)	(26,698,263)	(13,082,477)
LAND	0	0	0
ACCUMULATED DEPRECIATION	3,896,893	8,579,956	4,683,063
CIAC	1,319,118	1,899,848	580,730
ACCUMULATED AMORT CIAC	(202,778)	(357,709)	(154,931)
ADVANCES FOR CONSTRUCTION	0	0	0
OTHER	0	0	0
<b>TOTAL NON-USED AND USEFUL</b>	<u>(8,602,553)</u>	<u>(16,576,167)</u>	<u>(7,973,614)</u>
NON-USED AND USEFUL DEPR EXP	296,334	664,949	368,615
NON-USED AND USEFUL AMORT EXP	30,675	60,548	29,873
<b>NET ADJUSTMENT-WATER</b>	<u>(265,659)</u>	<u>(604,401)</u>	<u>(338,742)</u>
<b>PROPERTY TAX EXPENSE-GROSS (Sch B-15)</b>	290000	290000	<u>0</u>
Ratio of non-used plant to total (per staff)		43.92%	
Non-used property tax	31352	127,360	<u>(96,008)</u>
<b>WASTEWATER</b>			
PLANT	(20,225,569)	(31,106,873)	(10,881,304)
LAND	0	0	0
ACCUMULATED DEPRECIATION	6,759,615	10,250,580	3,490,965
CIAC	43,537,577	43,599,174	61,597
ACCUMULATED AMORT CIAC	(11,299,063)	(10,895,217)	403,846
ADVANCES FOR CONSTRUCTION	0	0	0
OTHER	0	0	0
<b>TOTAL NON-USED AND USEFUL</b>	<u>18,772,560</u>	<u>11,847,664</u>	<u>(6,924,896)</u>
NON-USED AND USEFUL DEPR EXP	587,624	932,521	344,897
NON-USED AND USEFUL AMORT EXP	1,060,447	1,094,039	33,592
<b>NET ADJUSTMENT-WASTEWATER</b>	<u>472,823</u>	<u>161,519</u>	<u>(311,304)</u>
<b>PROPERTY TAX EXPENSE-GROSS (Sch B-15)</b>	210,000	210000	<u>0</u>
Ratio of non-used plant to total (per staff)		56.47%	
Non-used property tax	66,329	118,596	<u>(52,267)</u>

Sch b13,p1,col9,line 49  
Sch b13,p1,col9,line 50

CORRECTED

COMPONENT	TEST YEAR PER UTILITY YEAR-END	UTILITY ADJUSTMENTS	ADJUSTED TEST YEAR PER UTILITY	COMMISSION 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)	(7,973,614)	(16,576,167)
4 CWIP	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	(519,702)	600,209
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
<b>RATE BASE</b>	<b>\$ 23,702,639</b>	<b>\$ (2,374,205)</b>	<b>\$ 21,328,434</b>	<b>\$ (7,864,928)</b>	<b>13,463,506</b>

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PALM COAST UTILITY CORPORATION  
 CAPITAL STRUCTURE  
 TEST YEAR ENDED 12/31/95

SCHEDULE NO. 2  
 DOCKET NO. 951056-WS

CORRECTED

DESCRIPTION	TOTAL CAPITAL	SPECIFIC ADJUSTMENTS (EXPLAIN)	PRO RATA ADJUSTMENTS	CAPITAL RECONCILED TO RATE BASE	RATIO	COST RATE	WEIGHTED COST
<b>PER UTILITY 1995 - YEAR-END</b>							
1 LONG TERM DEBT	\$ 12,125,000	\$ 0	\$ (643,582)	11,481,418	30.73%	7.24%	2.23%
2 SHORT-TERM DEBT	4,312,000	0	(228,876)	4,083,124	10.93%	7.73%	0.84%
3 PREFERRED STOCK	0	0	0	0	0.00%	0.00%	0.00%
4 COMMON EQUITY	20,265,735	0	(1,075,683)	19,190,052	51.37%	11.10%	5.70%
5 CUSTOMER DEPOSITS	485,000	0	(25,743)	459,257	1.23%	6.00%	0.07%
6 DEFERRED INCOME TAXES	0	0	0	0	0.00%	0.00%	0.00%
7 DEFERRED ITC'S-ZERO COST	2,266,072	0	(120,281)	2,145,791	5.74%	0.00%	0.00%
8 OTHER	0	0	0	0	0.00%	0.00%	0.00%
9 TOTAL CAPITAL	\$ <u>39,453,807</u>	\$ 0	\$ <u>(2,094,165)</u>	<u>37,359,642</u>	<u>100.00%</u>		<u>8.85%</u>
<b>PER COMMISSION 1995 - 13-MONTH AVERAGE</b>							
10 LONG TERM DEBT	\$ 12,557,692	\$ 0	\$ (7,092,202)	5,465,490	29.31%	7.24%	2.12%
11 SHORT-TERM DEBT	3,668,231	0	(2,071,705)	1,596,526	8.56%	7.73%	0.66%
12 PREFERRED STOCK	0	0	0	0	0.00%	0.00%	0.00%
13 COMMON EQUITY	19,943,543	0	(11,263,506)	8,680,037	46.55%	11.10%	5.17%
14 CUSTOMER DEPOSITS	458,926	0	0	458,926	2.46%	6.00%	0.15%
15 DEFERRED INCOME TAXES	0	0	0	0	0.00%	0.00%	0.00%
15 DEFERRED ITC'S-ZERO COST	2,316,226	129,534	0	2,445,760	13.12%	0.00%	0.00%
16 OTHER	0	0	0	0	0.00%	0.00%	0.00%
17 TOTAL CAPITAL	\$ <u>38,944,618</u>	\$ <u>129,534</u>	\$ <u>(20,427,413)</u>	<u>18,646,739</u>	<u>100.00%</u>		<u>8.10%</u>
RANGE OF REASONABLENESS						<b>LOW</b>	<b>HIGH</b>
RETURN ON EQUITY						<u>10.10%</u>	<u>12.10%</u>
OVERALL RATE OF RETURN						<u>7.63%</u>	<u>8.56%</u>

CORRECTED

DESCRIPTION	TEST YEAR PER UTILITY 1995	UTILITY ADJUSTMENTS	ADJUSTED TEST YEAR/ UTILITY 1995	COMMISSION ADJUSTMENTS	COMMISSION ADJUSTED TEST YEAR	REVENUE INCREASE	REVENUE REQUIREMENT
1 OPERATING REVENUES	\$ 5,384,699	\$ 1,586,948	\$ 6,971,647	\$(1,571,283)	\$ 5,400,364	\$(4,956)	5,395,408
OPERATING EXPENSES:						-0.09%	
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	\$(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	(166,716)	526,605	(223)	526,382
6 INCOME TAXES	(289,553)	781,183	491,630	(223,216)	268,414	(1,781)	266,633
7 TOTAL OPERATING EXPENSES	\$ 5,149,598	\$(64,307)	\$ 5,085,291	\$(778,313)	\$ 4,306,978	\$(2,004)	4,304,974
8 OPERATING INCOME	\$ 235,101	\$ 1,651,255	\$ 1,886,356	\$(792,970)	\$ 1,093,386	\$(2,952)	1,090,435
9 RATE BASE	\$ 23,702,639		\$ 21,328,434		\$ 13,463,506		\$ 13,463,506
RATE OF RETURN	0.99%		8.84%		8.12%		8.10%

SUMMARY OF IMPACT OF ERRORS

	Rev. Req.	Rate Base
As corrected	5,395,408	13,463,506
Per Order	5,094,035	11,009,212
Understatement	301,373	2,454,294



CORRECTED

DESCRIPTION	TEST YEAR PER UTILITY 1995	UTILITY ADJUSTMENTS	ADJUSTED TEST YEAR/ UTILITY 1995	COMMISSION ADJUSTMENTS	COMMISSION ADJUSTED TEST YEAR	REVENUE INCREASE	REVENUE REQUIREMENT
1 OPERATING REVENUES	\$ 3,150,538	\$ 1,756,312	\$ 4,906,850	\$(1,619,645)	\$ 3,287,205	\$(168,082)	3,119,123
OPERATING EXPENSES						-5.11%	
2 OPERATION AND MAINTENANCE	\$ 2,049,154	\$(80,503)	\$ 1,968,651	\$(54,030)	\$ 1,914,621	\$	1,914,621
3 DEPRECIATION	35,244	728,836	764,080	\$(37,397)	426,683		426,683
4 AMORTIZATION	\$(57,525)	(1,309)	\$(58,834)	1,309	\$(57,525)		\$(57,525)
5 TAXES OTHER THAN INCOME	258,285	187,325	445,610	\$(125,151)	320,459	\$(7,564)	312,895
6 INCOME TAXES	131,947	237,542	369,489	\$(206,437)	163,052	\$(60,403)	102,649
7 TOTAL OPERATING EXPENSES	\$ 2,417,105	\$ 1,071,891	\$ 3,488,996	\$(721,706)	\$ 2,767,290	\$(67,967)	2,699,323
8 OPERATING INCOME	\$ 733,433	\$ 684,421	\$ 1,417,854	\$(897,939)	\$ 519,915	\$(100,115)	419,800
9 RATE BASE	\$ 14,057,238	\$	\$ 16,031,208	\$	\$ 5,183,232	\$	\$ 5,183,232
RATE OF RETURN	5.22%		8.84%		10.03%		8.10%

SUMMARY OF IMPACT OF ERRORS

	Rev. Req.	Rate Base
As corrected	3,119,123	5,183,232
Per Order	3,105,262	5,183,232
Understatement	13,861	0