State of Florida



ORIGINAL Hublic Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEKARD PH 2: 07 TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

COMMISSION

DATE:

October 25, 2006

TO:

Stephen B. Fletcher, Professional Accountant Specialist, Division of Economic

Regulation

FROM:

Denise N. Vandiver, Chief of Auditing, Division of Regulatory Compliance &

Consumer Assistance (N)

RE:

Docket No: 060258-WS Company Name: Sanlando Utilities Corporation

Audit Purpose: File and Suspend Rate Case Investigation

Audit Control No: 06-209-2-6

Attached is the final audit report for the utility stated above. I am sending the utility a copy of this memo and the audit report. If the utility desires to file a response to the audit report, it should send the response to the Division of Commission Clerk and Administrative Services. There are no confidential work papers associated with this audit.

DNV:sbi Attachments

OTH

Copy: Division of Regulatory Compliance and Consumer

Assistance (Hoppe, District Offices, File Folder)

Division of Commission Clerk & Administrative Services (2) Division of Competitive Markets and Enforcement (Harvey)

General Counsel

Office of Public Counsel

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DOCUMENT NUMBER - DATE

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FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF REGULATORY COMPLIANCE & CONSUMER ASSISTANCE **BUREAU OF AUDITING**

Tampa District Office

SANLANDO UTILITIES CORPORATION

FILE AND SUSPEND RATE CASE INVESTIGATION

AS OF DECEMBER 31, 2005

DOCKET NO. 060258-WS AUDIT CONTROL NO. 06-209-2-6

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FPSC-COMMISSION CLERK

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DIVISION OF REGULATORY COMPLIANCE & CONSUMER ASSISTANCE AUDITOR'S REPORT

OCTOBER 16, 2006

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have performed the procedures described later in this report to meet the agreed upon objectives set forth by the Division of Economic Regulation in its audit service request dated July 26, 2006. We have applied these procedures to the attached schedules which were prepared by Sanlando Utilities Corporation in support of its filing for rate relief in Docket No. 060258-WS.

This audit was performed following general standards and field work standards found in the AICPA Statements on Standards for Attestation Engagements. This report is based on agreed upon procedures which are only for internal Commission use.

OBJECTIVES AND PROCEDURES

RATE BASE

General

Objective: To determine that the utility's filing represents its recorded results from continuing operations.

Procedures: We reconciled the following individual component rate base balances to the utility's general ledger as of December 31, 2005 and verified that adjustments required in Order Nos. PSC-00-0111-PAA-WS, issued January 12, 2000, and PSC-00-2097-AS-WS, issued November 6, 2000, were recorded. Audit Finding No. 1 discusses our adjustments to correct the utility's adjustment to 1997 UPIS and CIAC balances to record the prior order's rate base balance. Audit Finding No. 2 discusses our adjustments to correct the utility's adjustment to 1998 UPIS balances to record the prior order's rate base balance.

Utility-Plant-in-Service (UPIS)

Objective: To determine that property exists and is owned by the utility. To determine that additions to UPIS are authentic, recorded at original cost, and properly classified in compliance with Commission rules and the NARUC Uniform System of Accounts. To verify that the proper retirements of UPIS were made when a replacement item was put in service. Procedures: We sampled UPIS additions for the period January 1, 1998 through December 31, 2005 for compliance with the stated objectives above. We verified whether the utility properly recorded retirements to UPIS when a capital item was removed or replaced. We toured the utility plant sites to observe whether asset additions were completed and to ascertain if asset retirements were properly recorded. We sampled construction project additions and the corresponding source documentation. We verified that the utility used Commission approved AFUDC rates and traced the capitalized salaries to individual employee time sheets. Audit Finding No. 3 discusses our adjustments to remove unapproved organization cost. Audit Finding No. 4 discusses our adjustment to retire UPIS that was replaced. Audit Finding No. 5 discusses our adjustment to remove unapproved AFUDC accruals. Audit Finding No. 6 discusses our adjustment to include and allocate a dump truck that is recorded on the books of a subsidiary utility system but is used by Sanlando.

Land and Land Rights

Objective: To determine that utility land is recorded at original cost and is owned or secured under a long-term lease.

Procedures: We verified that there have been no changes to utility land since its last rate proceeding by searching the county's public records. We obtained the deeds for land additions if applicable and verified that they were recorded at original cost. We examined other additions to land to determine if they were properly recorded in the land account. Audit Finding No. 7 discusses our adjustment to remove unsupported land additions. Audit Finding No. 17 provides information on the sale of utility land. Audit Finding No. 22 provides information on a utility agreement that may provide a future benefit or create an obligation on utility operations.

Contributions-in-Aid-of-Construction (CIAC)

Objective: To determine that additions to CIAC are properly recorded in compliance with Commission rules and the NARUC Uniform System of Accounts. To verify that CIAC additions are reflective of the utility's Commission approved service availability tariff. To verify and insure that all donated property is properly accounted for and recorded as CIAC and UPIS.

Procedures: We sampled CIAC additions for the period January 1, 1998 through December 31, 2005 for compliance with the stated objectives above. We scanned the utility's cash receipts records for unrecorded cash and property. We reviewed developer agreements for unrecorded CIAC. We traced utility CIAC schedules to the general ledger and the utility's authorized tariff rates. We toured the utility's authorized service territory to look for new developments that may have included contributed property. Audit Finding No. 8 discusses our adjustment to correct the utility's CIAC balances because the utility double booked the overearnings in 1997 and 1998 required by the Commission. Audit Finding No. 18 provides information on the utility's 2003 CIAC adjusting journal entry that was made to allocate CIAC based on specific UPIS account balances. Audit Finding No. 19 provides information on potential unrecorded CIAC from our review of developer agreements.

Accumulated Depreciation

Objective: To determine that accruals to accumulated depreciation are properly recorded in compliance with Commission rules and the NARUC Uniform System of Accounts. To verify that depreciation expense accruals are calculated using the Commission authorized rates and that retirements are properly recorded.

Procedures: We traced the accumulated depreciation schedules to the corresponding UPIS schedules. We verified that the utility used Commission authorized rates to depreciate its UPIS accounts by calculating a sample of accumulated depreciation account balances to test for calculation errors. We verified whether the utility properly recorded retirements to accumulated depreciation when the corresponding UPIS was removed or replaced. recalculated a sample of accumulated depreciation account balances as of December 31, 2005. Audit Finding No. 1 discusses our adjustments to correct the utility's adjustment to 1997 UPIS balance and the corresponding effect on accumulated depreciation. Audit Finding No. 2 discusses our adjustments to correct the utility's adjustment to 1998 UPIS balances and the corresponding effect on accumulated depreciation. Audit Adjustment No. 3 discusses our adjustments to remove unapproved organization cost and the corresponding effect on accumulated depreciation. Audit Finding No. 4 discusses our adjustment to retire UPIS that was replaced and the corresponding effect on accumulated depreciation. Audit Finding No. 5 discusses our adjustment to remove unapproved AFUDC accruals and the corresponding effect on accumulated depreciation. Audit Finding No. 9 discusses our adjustment to include the accumulated amortization balance for the utility's computer system that was left out of the filing. Audit Finding No. 14 discusses our adjustment to depreciation expense balances and the corresponding effect on accumulated depreciation.

Accumulated Amortization of CIAC

Objective: To determine that accruals to accumulated amortization of CIAC are properly recorded in compliance with Commission rules and the NARUC Uniform System of Accounts. To verify that CIAC amortization expense accruals are properly recorded and

calculated based on the rates and method used in the utility's last rate proceeding.

Procedures: We traced the accumulated amortization of CIAC schedules to the corresponding CIAC schedules. We verified whether the utility used Commission authorized rates to amortize its CIAC accounts by calculating a sample of accumulated amortization account balances to test for calculation errors. We recalculated a sample of accumulated amortization of CIAC account balances as of December 31, 2005. Audit Finding No. 1 discusses our adjustments to correct the utility's adjustment to 1997 CIAC balances and the corresponding effect on accumulated amortization of CIAC. Audit Finding No. 8 discusses our adjustment to correct the utility's CIAC balances and the corresponding effect on accumulated amortization of CIAC. Audit Finding No. 15 discusses our adjustment to CIAC amortization expense balances and the corresponding effect on accumulated amortization of CIAC.

Working Capital

Objective: To determine that the utility's working capital balance is properly calculated in compliance with Commission rules.

Procedures: We recalculated the utility's working capital balance as of December 31, 2005. Audit Finding No. 11 discusses our adjustment to correct and allocate the utility's working capital allowance to balances reported in its general ledger.

Other Rate Base Items

Objective: To determine that other component balances affecting rate base are properly stated and authorized by Commission rules or prior orders.

Procedures: Determine that adjustments to include allocated rate base from subsidiary operations are properly reported in the filing. Audit Finding No. 10 discusses our adjustments to WSC allocated rate base balances based on the affiliate transaction investigation performed in Docket. No. 060253-WS.

NET OPERATING INCOME

General

Objective: To determine that the utility's filing represents its results from continuing operations.

Procedures: We reconciled the following individual component net operating income balances to the utility's general ledger for the 12-month period ended December 31, 2005.

Revenues

Objective: To determine that revenues are properly recorded in compliance with Commission rules and are based on the utility's Commission approved tariff rates.

Procedures: We traced revenues to the general ledger and utility billing registers and selected a sample of customer bills from each customer rate class on a random basis and recalculated the bills using the Commission approved tariff rates.

Operation and Maintenance Expenses (O&M)

Objective: To determine that operation and maintenance expenses are properly recorded in compliance with Commission rules and were reasonable and prudent for ongoing utility operations.

Procedures: We sampled O&M expense items from the general ledger based on auditor judgment. We reviewed the sample for the proper utility system, water or wastewater classification, NARUC account, amount, period and recurring nature. We examined invoices and supporting documentation to determine if the above objectives are met. Audit Finding No. 12 discusses our adjustments to O&M expense balances because the items were either non-recurring in nature or no supporting documentation was provided. Audit Finding No. 13 discusses our adjustments to the allocated WSC O&M expense balances based on the affiliate transaction investigation performed in Docket. No. 060253-WS. Audit Finding No. 23 provides information on a new continuing maintenance plan for wastewater services.

Taxes-Other-Than-Income (TOTI)

Objective: To determine that taxes other than income tax expense is properly recorded in compliance with Commission rules and was reasonable and prudent for ongoing utility operations.

Procedures: We obtained the regulatory assessment fee filings and reconciled them to the general ledger. We obtained the property tax bills for review and to determine if the amount booked reflects the discount amount. Audit Finding No. 16 discusses our adjustments to regulatory assessment fees and property tax balances.

Depreciation Expense

Objective: To determine that depreciation expense is properly recorded in compliance with Commission rules and that it accurately represents the depreciation of UPIS assets and amortization of CIAC assets for ongoing utility operations.

Procedures: We recalculated a sample of UPIS depreciation expense and CIAC amortization expense balances for the period using Commission approved rates and we verified that CIAC amortization expense was properly netted against depreciation expense. Audit Finding No. 1 discusses our adjustments to correct the utility's adjustment to 1997 UPIS and CIAC balances. and the corresponding effect on net depreciation expense. Audit Finding No. 2 discusses our adjustments to correct the utility's adjustment to 1998 UPIS balances and the corresponding effect on depreciation expense. Audit Adjustment No. 3 discusses our adjustments to remove unapproved organization cost and the corresponding effect on depreciation expense. Audit Finding No. 4 discusses our adjustment to retire UPIS that was replaced and the corresponding effect on depreciation expense. Audit Finding No. 5 discusses our adjustment to remove unapproved AFUDC accruals and the corresponding effect on depreciation expense. Audit Finding No. 8 discusses our adjustment to correct the utility's CIAC balances and the corresponding effect on CIAC amortization expense. Audit Finding No. 14 discusses our adjustment to depreciation expense balances because the utility did not always use the rates established by Rule 25-30.140 F.A.C. Audit Finding No. 15 discusses our adjustment to CIAC amortization expense balances because the utility did not always use the rates established by Rule 25-30.140 F.A.C.

CAPITAL STRUCTURE

General

Objective: To determine the components of the utility's capital structure and the respective cost rates used to arrive at the overall weighted cost of capital are properly recorded in compliance with Commission rules and that it accurately represents the ongoing utility operations.

Procedures: We reconciled the following individual component capital structure balances to the utility's general ledger as of December 31, 2005. Audit Finding No. 20 provides information on the utility's capital structure component balances that were determined in the affiliate transaction investigation performed in Docket. No. 060253-WS.

Long-Term-Debt

Objective: To determine that long-term debt balances represent actual obligations of the utility's parent and that they are properly recorded in compliance with Commission rules.

Procedures: We traced long-term debt balances to the original documents and verified the terms and interest rate of each note payable.

Short-Term-Debt

Objective: To determine that short-term debt balances represent actual obligations of the utility's parent and that they are properly recorded in compliance with Commission rules. *Procedures:* We traced short-term debt balances to the original documents and verified the terms and interest rate and period. We recalculated test year interest expense.

Accumulated Deferred Income Taxes

Objective: To determine that accumulated deferred income taxes are properly stated and calculated based on the recorded differences between utility book and taxable income.

Procedures: Recalculated a sample of deferred tax balances for the period to using Commission authorized rates and federal tax rates. Audit Finding No. 21 provides

information on the utility's deferred tax balances.

Customer Deposits

Objective: To determine that customer deposit balances represent actual obligations of the utility and are properly recorded in compliance with Commission rules.

Procedures: We traced a sample of customer deposit balances to supporting documentation and verified that customer deposits were refunded and credited with interest payments in compliance with Commission rules.

SUBJECT: ADJUSTMENT TO 1997 RATE CASE BALANCES

SUMMARY: The utility's 13-month average water and wastewater rate base should is overstated by \$53,622 and \$51,552, respectively, as of December 31, 2005.

STATEMENT OF FACT: Order No. PSC-00-0111-PAA-WS, established the following transfer balances for the indicated utility accounts.

Utility	NARUC		** ***
Acct. No.	Acct. No.	Acct. Description	<u>Balance</u>
2711000	271	Water - CIAC	(\$10,330,055)
2721000	271	Wastewater - CIAC	(\$10,405,584)
2722000	272	Water - Acc/Amortz. Of CIAC	\$4,482,760
2723000	272	Wastewater - Acc/Amortz. Of CIAC	\$5,587,752
3446095	344	Water - Laboratory Equip.	\$4,316
3971000	397	Water - Misc. Equip.	\$12,709

The utility posted the following balances in its 1998 general ledger to record the acquisition of Sanlando.

Utility	NARUC		
Acct. No.	Acct. No.	Acct. Description	Balance
2711000	271	Water - CIAC	(\$10,572,529)
2721000	271	Wastewater - CIAC	(\$10,638,917)
2722000	272	Water - Acc/Amortz. Of ClAC	\$4,725,234
2723000	272	Wastewater - Acc/Amortz. Of CIAC	\$5,821,085
3466097	344	Water - Communication Equip.	\$17,025

The differences between the water and wastewater CIAC and accumulated amortization of CIAC is \$242,474 and \$233,333, respectively. These balances represent two CIAC escrow accounts, the grossed-up cash contribution amount and the income tax payable on amounts collected, that were not included in the transfer balances in the above-mentioned order. The utility amortized the water and wastewater escrow account cash balances which were included within the combined water and wastewater CIAC accounts. The adjustment to the CIAC accounts is offsetting, however, because the utility continued to amortize the escrow account balances it causes accumulated amortization of CIAC to be overstated for all subsequent periods since 1998 and it overstates the test year CIAC amortization expense. Therefore, adjustments to the accumulated amortization of CIAC and CIAC amortization expense balances are needed.

The differences between Acct. Nos. 3446095, 3466097 and 3971000 is because the utility recorded the entire order balance in its communication equipment account. The adjustment to the asset accounts is offsetting, however, because the accounts have different depreciation rates, adjustments to the accumulated depreciation and depreciation expense balances are needed.

Our calculations of the adjustments are displayed on the following pages.

EFFECT ON GENERAL LEDGER: The following journal entries should be made to correct the utility's general ledger balances.

Adjustments to CIAC

Utility	NARUC		,	
Acct. No.	Acct. No.	Acct. Description	<u>Debit</u>	<u>Credit</u>
2151000	215	Retained Earnings	\$96,228	
2711***	271	CIAC - Water	\$242,474	
2721***	271	CIAC - Wastewater	\$233,333	
2722***	272	Acc/Amortz. of CIAC - Water		\$300,636
2723***	272	Acc/Amortz. of CIAC - Wastewater		\$284,885
4071***	407	CIAC Amortz. Exp Water	\$7,142	
4073***	407	CIAC Amortz. Exp Wastewater	\$6,344	

Acct. No. 2722*** of \$300,636 = \$242,474 + \$58,162

Acct. No. 2723*** of \$284,885 = \$233,333 + \$51,552

See the schedule on the following page for the specific CIAC, Acc/Amortz. Of CIAC and CIAC Amortz. Exp. sub-account adjustments.

Adjustments to utility plant in service.

NARUC			
Acct. No.	Acct. Description	<u>Debit</u>	<u>Credit</u>
108	Acc/Dep - Laboratory Equip.		\$2,302
108	Acc/Dep - Communication Equip.	\$13,621	
108	Acc/Dep - Misc. Equip.		\$6,778
215	Retained Earnings		\$3,973
344	Laboratory Equip.	\$4,316	
346	Communication Equip.		\$17,026
347	Misc. Equip.	\$12,710	
403	Dep. Exp Laboratory Equip.	\$288	
403	Dep. Exp Communication Equip.		\$1,703
403	Dep. Exp Misc. Equip.	\$847	
	Acct. No. 108 108 108 215 344 346 347 403 403	Acct. No. Acct. Description 108 Acc/Dep - Laboratory Equip. 108 Acc/Dep - Communication Equip. 108 Acc/Dep - Misc. Equip. 215 Retained Earnings 344 Laboratory Equip. 346 Communication Equip. 347 Misc. Equip. 403 Dep. Exp Laboratory Equip. 403 Dep. Exp Communication Equip.	Acct. No. Acct. Description Debit 108 Acc/Dep - Laboratory Equip. \$13,621 108 Acc/Dep - Communication Equip. \$13,621 108 Acc/Dep - Misc. Equip. \$4,316 215 Retained Earnings \$4,316 344 Laboratory Equip. \$4,316 346 Communication Equip. \$12,710 347 Misc. Equip. \$288 403 Dep. Exp Laboratory Equip. \$288 403 Dep. Exp Communication Equip.

EFFECT ON FILING: The utility's 13-month average water and wastewater rate base should be reduced by \$53,622 (\$300,636 - \$242,474 - \$4,540) and \$51,552, (\$284,885 - \$233,333) respectively, as of December 31, 2005. The utility's water and wastewater net depreciation expense balances should be increased by \$6,574 (\$7,142 - \$568) and \$6,344, respectively, for the 12-month period ended December 31, 2005.

Utility Acct. No.	NARUC <u>Acct. No.</u>	<u>Amount</u>	Dep. <u>Rate</u>	Dep. Exp. Adjustment	Depreciation Years	Acc/Dep Adjustment
3446095	344	\$4,316	6.67%	\$288	8	\$2,302
	346	(17,026)	10.00%	(1,703)	8	(13,621)
3466097	347	12,710	6.67%	<u>847</u>	8	<u>6,778</u>
Total Adjustme	ent	\$0		(\$568)		(\$4,540)

13-Month average adjustment equals year end adjustment

			Co	mposite Am	ortization E	Rate Applied	1008_2003						
		•	3.00%	3.00%	3.01%	3.02%	3.02%	3.04%	Amortz.	:			
Utility	CIAC	2003	1998	1999	2000	2001	2002	2003	rate for	2004	2005	Acc/Amortz.	Utility
Acct. No. CIAC Water	Adjust	Alloc. %	Amortz.	Amo tz.	Amortz.	Amortz.	Amortz.	Amortz.	2004-05	Amortz.	Amortz.	Adjustment	Acct. No.
2711011 CIAC - Structures	\$630	0.26%	\$19	\$19	\$19	\$19	\$19	\$19	2.50%	\$!6	\$16	\$146	2722011
2711021 CIAC - Pumping Equip.	242	0.10%	7	· 7	7	7	7	7	3.13%	8	8	59	2722021
2711031 CIAC - Struct. TP	4,534	1.87%	136	136	137	137	137	138	3.13%	142	142	1,105	2722031
2711014 CIAC - Wells & Springs	11,833	4.88%	355	355	356	358	358	359	3.34%	395	395	2,931	2722014
2711025 CIAC - Elec. Pumping	21,386	8.82%	642	642	644	647	647	649	5.00%	1,070	1,070	6,010	2722025
2711032 CIAC - Treatment	5,698	2.35%	171	171	172	172	172	173	4.55%	259	259	1,549	2722032
2711042 CIAC - Distribution	18,477	7.62%	554	554	557	559	559	561	2.70%	499	499	4,341	2722042
2711043 CIAC - T&D Mains	126,887	52.33%	3,807	3,807	3,822	3,837	3,837	3,852	2.33%	2,954	2,954	28,869	2722043
2711045 CIAC - Services	20,271	8.36%	608	608	611	613	613	615	2.50%	506	506	4,680	2722045
2711046 CIAC - Meters	19,834	8.18%	595	595	597	600	600	602	5.00%	993	993	5,574	2722046
2711047 CIAC - Meter Install.	703	0.29%	21	21	21	21	21	21	5.00%	35	35	198	2722047
2711048 CIAC - Hydrants	<u>11,978</u>	4.94%	<u>359</u>	<u>359</u>	<u> 361</u>	<u> 362</u>	<u>362</u>	<u>364</u>	2.22%	<u> 266</u>	<u> 266</u>	<u>2,699</u>	2722048
	\$242,474	100.00%	\$7,274	\$7,274	\$7,303	\$7,332	\$7,332	\$7,362		\$7,142	\$7,142	\$58,162	
OLA CANY A P.	0010171					_			. = .		00.110	050 160	
CIAC Water Adjustments	<u>\$242,474</u>	Reverse 1998	B journal entry	y to CIAC]	Remove cur	nulative effe	ct on 2005 A	mort, Exp. and	Acc/Amortz	<u>\$7.142</u>	<u>\$58,162</u>	
CIAC Water Adjustments	<u>\$242,474</u>	Reverse 1998							mort, Exp. and	Acc/Amortz	<u>\$7.142</u>	<u>\$58,162</u>	
CIAC Water Adjustments	<u>\$242.474</u>	Reverse 1998	Cc	emposite An	nortization I	Rate Applied	l 1998-2003	l	•	Acc/Amortz	<u>\$7.142</u>	<u>\$58,162</u>	
•			Cc	emposite An 2.88%	nortization I	Rate Applied	1 1998-2003 2.76%	2.62%	Amortz.				Utility
Utility	CIAC	2003	2.88% 1998	mposite An 2.88% 1999	nortization I 2.76% 2000	Rate Applied 2.76% 2001	1 1998-2003 2.76% 2002	2.62% 2003	Amortz.	2004	2005	Acc/Amortz.	Utility Acct. No.
Utility Acct. No. CIAC Wastewater	CIAC Adjust.	2003 Alloc. %	2.88% 1998 Amortz.	emposite An 2.88% 1999 Amortz.	nortization I 2.76% 2000 Amortz.	Rate Applied 2.76% 2001 Amortz.	1 1998-2003 2.76% 2002 Amortz.	2.62% 2003 Amortz.	Amortz. rate for 2004-05				Utility Acct. No. 2723003
Utility Acct. No. CIAC Wastewater 2721003 CIAC - Structures	CIAC Adjust. 4,387	2003 Alloc. % 1.88%	2.88% 1998 Amortz.	omposite An 2.88% 1999 Amortz. 126	2.76% 2000 Amortz.	Rate Applied 2.76% 2001 Amortz.	1 1998-2003 2.76% 2002 Amortz. 121	2.62% 2003 Amortz.	Amortz. rate for 2004-05 3.13%	2004 Amortz. 137	2005 Amortz.	Acc/Amortz. Adjustment 1,005	Acct. No.
Utility Acct. No. CIAC Wastewater 2721003 CIAC - Structures 2721005 CIAC - Treatment Plant	CIAC Adjust. 4,387 75,483	2003 Alloc. % 1.88% 32.35%	2.88% 1998 Amortz. 126 2,174	2.88% 1999 Amortz. 126 2,174	2.76% 2000 Amortz. 121 2,083	2.76% 2001 Amortz. 121 2,083	1 1998-2003 2.76% 2002 Amortz.	2.62% 2003 Amortz.	Amortz. rate for 2004-05	2004 Amortz.	2005 Amortz.	Acc/Amortz. Adjustment	Acct. No. 2723003
Utility Acct. No. CIAC Wastewater 2721003 CIAC - Structures 2721005 CIAC - Treatment Plant 2721006 CIAC - Service Lines	CIAC Adjust. 4,387 75,483 1,190	2003 Alloc. % 1.88% 32.35% 0.51%	2.88% 1998 Amortz. 126 2,174 34	2.88% 1999 Amortz. 126 2,174	2.76% 2000 Amortz.	Rate Applied 2.76% 2001 Amortz.	2.76% 2002 Amortz. 121 2,083	2.62% 2003 Amortz. 115 1,975	Amortz. rate for 2004-05 3.13% 2.86%	2004 Amortz. 137 2,156	2005 Amortz. 137 2,156	Acc/Amortz. Adjustment 1,005 16,884	Acct. No. 2723003 2723005
Utility Acct. No. CIAC Wastewater 2721003 CIAC - Structures 2721005 CIAC - Treatment Plant 2721006 CIAC - Service Lines 2721007 CIAC - Force Mains	CIAC Adjust. 4,387 75,483 1,190 1,330	2003 Alloc. % 1.88% 32.35% 0.51% 0.57%	2.88% 1998 Amortz. 126 2,174 34 38	2.88% 1999 Amortz. 126 2,174 34 38	2.76% 2000 Amortz. 121 2,083 33 37	2.76% 2001 Amortz. 121 2,083 33 37	2.76% 2002 Amortz. 121 2,083 33 37	2.62% 2003 Amortz. 115 1,975 31	Amortz. rate for 2004-05 3.13% 2.86% 3.34%	2004 Amortz. 137 2,156 40	2005 Amortz. 137 2,156 40	Acc/Amortz. Adjustment 1,005 16,884 278 310	Acet. No. 2723003 2723005 2723006
Utility Acct. No. CIAC Wastewater 2721003 CIAC - Structures 2721005 CIAC - Treatment Plant 2721006 CIAC - Service Lines	CIAC Adjust. 4,387 75,483 1,190 1,330 112,093	2003 Alloc. % 1.88% 32.35% 0.51%	2.88% 1998 Amortz. 126 2,174 34	2.88% 1999 Amortz. 126 2,174	2.76% 2000 Amortz. 121 2,083 33	2.76% 2.001 Amortz. 121 2,083 33	11998-2003 2.76% 2002 Amortz. 121 2,083 33	2.62% 2003 Amortz. 115 1,975 31 35	Amortz. rate for 2004-05 3.13% 2.86% 3.34% 3.34%	2004 Amortz. 137 2,156 40 44	2005 Amortz. 137 2,156 40 44	Acc/Amortz. Adjustment 1,005 16,884 278	Acct. No. 2723003 2723005 2723006 2723007 2723008 2723009
Utility Acct. No. CIAC Wastewater 2721003 CIAC - Structures 2721005 CIAC - Treatment Plant 2721006 CIAC - Service Lines 2721007 CIAC - Force Mains 2721008 CIAC - Gravity Mains	CIAC Adjust. 4,387 75,483 1,190 1,330 112,093 10,617	2003 Alloc. % 1.88% 32.35% 0.51% 0.57% 48.04%	2.88% 1998 Amortz. 126 2,174 34 38 3,228	2.88% 1999 Amortz. 126 2,174 34 38 3,228	2.76% 2000 Amortz. 121 2,083 33 37 3,094	2.76% 2001 Amortz. 121 2,083 33 37 3,094	2.76% 2002 Amortz. 121 2,083 33 37 3,094	2.62% 2003 Amortz. 115 1,975 31 35 2,932	Amortz. rate for 2004-05 3.13% 2.86% 3.34% 3.34% 2.22%	2004 Amortz. 137 2,156 40 44 2,488	2005 Amortz. 137 2,156 40 44 2,488	Acc/Amortz. Adjustment 1,005 16,884 278 310 23,647	Acet. No. 2723003 2723005 2723006 2723007 2723008
Utility Acct. No. CIAC Wastewater 2721003 CIAC - Structures 2721005 CIAC - Treatment Plant 2721006 CIAC - Service Lines 2721007 CIAC - Force Mains 2721008 CIAC - Gravity Mains 2721009 CIAC - Outfall Lines 2721011 CIAC - Lift Station	CIAC Adjust. 4,387 75,483 1,190 1,330 112,093 10,617 \$27,603	2003 Alloc. % 1.88% 32.35% 0.51% 0.57% 48.04% 4.55% 11.83%	2.88% 1998 Amortz. 126 2,174 34 38 3,228 306 \$795	2.88% 1999 Amortz. 126 2,174 34 38 3,228 306 \$795	2.76% 2000 Amortz. 121 2,083 33 37 3,094 293 \$762	2.76% 2001 Amortz. 121 2,083 33 37 3,094 293 \$762	2.76% 2002 Amortz. 121 2,083 33 37 3,094 293	2.62% 2003 Amortz. 115 1,975 31 35 2,932 278	Amortz. rate for 2004-05 3.13% 2.86% 3.34% 3.34% 2.22% 3.34%	2004 Amortz. 137 2,156 40 44 2,488 354	2005 Amortz. 137 2,156 40 44 2,488 354	Acc/Amortz. Adjustment 1,005 16,884 278 310 23,647 2,477	Acct. No. 2723003 2723005 2723006 2723007 2723008 2723009
Utility Acct. No. CIAC Wastewater 2721003 CIAC - Structures 2721005 CIAC - Treatment Plant 2721006 CIAC - Service Lines 2721007 CIAC - Force Mains 2721008 CIAC - Gravity Mains 2721009 CIAC - Outfall Lines	CIAC Adjust. 4,387 75,483 1,190 1,330 112,093 10,617	2003 Alloc. % 1.88% 32.35% 0.51% 0.57% 48.04% 4.55%	2.88% 1998 Amortz. 126 2,174 34 38 3,228 306	2.88% 1999 Amortz. 126 2,174 34 38 3,228 306	2.76% 2000 Amortz. 121 2,083 33 37 3,094 293	2.76% 2001 Amortz. 121 2,083 33 37 3,094 293	2.76% 2002 Amortz. 121 2,083 33 37 3,094 293 \$762	2.62% 2003 Amortz. 115 1,975 31 35 2,932 278 \$722	Amortz. rate for 2004-05 3.13% 2.86% 3.34% 3.34% 2.22% 3.34% 4.00%	2004 Amortz. 137 2,156 40 44 2,488 354 \$1,103	2005 Amortz. 137 2,156 40 44 2,488 354 \$1,103	Acc/Amortz. Adjustment 1,005 16,884 278 310 23,647 2,477 \$6,804	Acet. No. 2723003 2723005 2723006 2723007 2723008 2723009 2723011
Utility Acct. No. CIAC Wastewater 2721003 CIAC - Structures 2721005 CIAC - Treatment Plant 2721006 CIAC - Service Lines 2721007 CIAC - Force Mains 2721008 CIAC - Gravity Mains 2721009 CIAC - Outfall Lines 2721011 CIAC - Lift Station	CIAC Adjust. 4,387 75,483 1,190 1,330 112,093 10,617 \$27,603 630	2003 Alloc. % 1.88% 32.35% 0.51% 0.57% 48.04% 4.55% 11.83% 0.27%	2.88% 1998 Amortz. 126 2,174 34 38 3,228 306 \$795 18	2.88% 1999 Amortz. 126 2,174 34 38 3,228 306 \$795 18	2.76% 2000 Amortz 121 2,083 33 37 3,094 293 \$762 17	2.76% 2001 Amortz. 121 2,083 33 37 3,094 293 \$762	2.76% 2002 Amortz. 121 2,083 33 37 3,094 293 \$762 17	2.62% 2003 Amortz. 115 1,975 31 35 2,932 278 \$722 16	Amortz. rate for 2004-05 3.13% 2.86% 3.34% 3.34% 2.22% 3.34% 4.00%	2004 Amortz. 137 2,156 40 44 2,488 354 \$1,103 21	2005 Amortz. 137 2,156 40 44 2,488 354 \$1,103 21	Acc/Amortz. Adjustment 1,005 16,884 278 310 23,647 2,477 \$6,804 147	Acet. No. 2723003 2723005 2723006 2723007 2723008 2723009 2723011
Utility Acct. No. CIAC Wastewater 2721003 CIAC - Structures 2721005 CIAC - Treatment Plant 2721006 CIAC - Service Lines 2721007 CIAC - Force Mains 2721008 CIAC - Gravity Mains 2721009 CIAC - Outfall Lines 2721011 CIAC - Lift Station	CIAC Adjust. 4,387 75,483 1,190 1,330 112,093 10,617 \$27,603 630	2003 Alloc. % 1.88% 32.35% 0.51% 0.57% 48.04% 4.55% 11.83% 0.27%	2.88% 1998 Amortz. 126 2,174 34 38 3,228 306 \$795 18 \$6,720	2.88% 1999 Amortz. 126 2,174 34 38 3,228 306 \$795 18 \$6,720	2.76% 2000 Amortz. 121 2,083 33 37 3,094 293 \$762 17 \$6,440	2.76% 2001 Amortz. 121 2,083 33 37 3,094 293 \$762 17 \$6,440	2.76% 2002 Amortz. 121 2,083 33 37 3,094 293 \$762 17 \$6,440	2.62% 2003 Amortz. 115 1,975 31 35 2,932 278 \$722 16 \$6,104	Amortz. rate for 2004-05 3.13% 2.86% 3.34% 3.34% 2.22% 3.34% 4.00%	2004 Amortz. 137 2,156 40 44 2,488 354 \$1,103 21 \$6,344	2005 Amortz. 137 2,156 40 44 2,488 354 \$1,103 21	Acc/Amortz. Adjustment 1,005 16,884 278 310 23,647 2,477 \$6,804 147	Acet. No. 2723003 2723005 2723006 2723007 2723008 2723009 2723011

In 2003 the utility redistributed its CIAC account balances based on the percentage of UPIS. The above schedule incorporates that allocation in its calculations.

SUBJECT: ADJUSTMENT TO 1998 RATE BASE ADDITIONS

SUMMARY: The utility's water and wastewater 13-month average rate base balances are overstated by \$220,579 and understated by \$137,260, respectively as of December 31, 2005.

STATEMENT OF FACT: Order No. PSC-00-0111-PAA-WS, established specific rate base balances for the utility as of December 31, 1997. The utility posted the transfer balances to its general ledger in October 1998 plus all of the additional activity for the period January through October 1998. The utility could not provide adequate supporting documentation for the differences between the balance approved in the transfer order and the balance posted to its general ledger for the following rate base accounts.

			•
	Balance per Order	Balance per Utility	
Acct. Description	at 12/31/1997	at 10/31/1998	<u>Difference</u>
Water Plant in Process	\$201,080	\$257,826	\$56,746
Dist Resv & Stndpipes	\$914,186	\$953,503	\$39,317
Meters	\$911,284	\$917,058	\$5,774
Office Furniture & Equipment	\$62,333	\$66,157	\$3,823
Tools, Shop and Equipment	\$83,648	\$97,850	\$14,202
Sewage Treatment Plant	\$3,791,765	\$3,794,046	\$2,281
Office Furniture & Equipment	\$53,143	\$56,127	\$2,983
Tools, Shop and Equipment	\$12,570	\$13,794	\$1,224
Communication Equipment	\$16,003	\$29,280	\$13,277
	Water Plant in Process Dist Resv & Stndpipes Meters Office Furniture & Equipment Tools, Shop and Equipment Sewage Treatment Plant Office Furniture & Equipment Tools, Shop and Equipment	Acct. Description at 12/31/1997 Water Plant in Process \$201,080 Dist Resv & Stndpipes \$914,186 Meters \$911,284 Office Furniture & Equipment \$62,333 Tools, Shop and Equipment \$3,791,765 Office Furniture & Equipment \$53,143 Tools, Shop and Equipment \$12,570	Acct. Description at 12/31/1997 at 10/31/1998 Water Plant in Process \$201,080 \$257,826 Dist Resv & Stndpipes \$914,186 \$953,503 Meters \$911,284 \$917,058 Office Furniture & Equipment \$62,333 \$66,157 Tools, Shop and Equipment \$83,648 \$97,850 Sewage Treatment Plant \$3,791,765 \$3,794,046 Office Furniture & Equipment \$53,143 \$56,127 Tools, Shop and Equipment \$12,570 \$13,794

The differences indicated above appear to be additions for the period January 1998 through October 1998. The utility provided a schedule that displayed its rate base balances as of June 1998 and additions through September 1998. The schedule, however, was inadequate in detail and lacked additional documentation to support the 1998 additions discussed above.

The following balances to the indicated accounts should be removed from rate base because the utility could not provide supporting documentation.

Ut	ility		UPIS	Dep.	Dep. Exp.		Acc/Dep
Acc	t. No.	Acct. Description	<u>Adjustment</u>	Rate	Adjustment	Years	Adjustment
3305042	1083042	Dist Resv & Stndpipes	(\$39,317)	2.70%	(\$1,062)	7.5	(\$7,962)
3345046	1083046	Meters	(5,774)	5.00%	(289)	7.5	(2,167)
3406091	1083091	Office Furniture & Equipment	(3,823)	6.72%	(257)	7.5	(1,927)
3466094	1083094	Tools, Shop and Equipment	(14,202)	6.25%	(888)	7.5	(6,659)
	Total Wate	r Adjustments	(\$63,117)	ž	(\$2,495)		(\$18,715)
3804005	1084005	Sewage Treatment Plant	(\$2,281)	2.86%	(65)	7.5	(\$488)
3907091	1084091	Office Furniture & Equipment	(2,983)	6.67%	(199)	7.5	(1,493)
3937094	1084094	Tools, Shop and Equipment	(1,224)	6.25%	(77)	7.5	(574)
3967097	1084097	Communication Equipment	(13,277)	10.00%	(1,327)	7.5	(9,954)
Total Wastewater Adjustments			(\$19,765)		(\$1,668)		(\$12,509)

The balance for construction work in process (CWIP) was established at \$201,080 at transfer and was displayed as \$33,507 for water and \$167,573 for wastewater in the above mentioned order. As stated above, it appears that the utility posted additions to this account in 1998 which we could not substantiate because of inadequate supporting documentation. The difference of \$56,746 should be removed.

The utility's 1999 general ledger indicates that a construction project was closed out to Acct. No. 3315043 - T&D Mains in December 1999 for \$257,000. The project described above is the only utility project of that size that was active at that time. It appears that the utility posted the entire CWIP balance into Acct. No. 1052091 - Water Plant In Process without differentiating the balance between water and wastewater accounts. When the project was completed the utility posted the entire balance to its water system. It appears reasonable that a project of that magnitude would be for utility infrastructure such as T&D mains. However, the project should have been split between water and wastewater accounts as indicated to the balances approved in the order.

The following balances to the indicated accounts are adjusted to correct the 1998 CWIP transfer balance and to distribute the construction project to the proper water and wastewater accounts.

Utility			UPIS	Dep.	Dep. Exp.		Acc/Dep
Acct. No.		Acct. Description	<u>Adjustment</u>	Rate	<u>Adjustment</u>	<u>Years</u>	Adjustment
3315043	1083042	T&D Mains	(\$223,493)	2.33%	(\$5,198)	6.5	(\$33,784)
3612008	1084005	Sewer Mains	<u>\$167,573</u>	2.22%	3,724	6.5	\$24,205
	Total adjus	tment to CWIP balance	(\$55,920)				

(\$223,493) = \$33,507 - \$275,000

EFFECT ON GENERAL LEDGER: The following journal entries should be made to correct the utility's general ledger balances.

Water Adjustment Entries

Utility	NARUC			
Acct. No.	Acct. No.	Acct. Description	<u>Debit</u>	<u>Credit</u>
1083042	108	Acc/Dep - Dist Resv & Stndpipes	\$7,962	
1083043	108	Acc/Dep - T&D Mains	\$33,784	
1083046	108	Acc/Dep - Meters	\$2,167	
1083091	108	Acc/Dep - Office Furniture & Equipment	\$1,927	
1083094	108	Acc/Dep - Tools, Shop and Equipment	\$6,659	
2151000	215	Retained Earnings	\$241,804	
3305042	330	Dist Resv & Stndpipes		\$39,317
3315043	331	T&D Mains	,	\$223,493
3345046	334	Meters		\$5,774
3406091	340	Office Furniture & Equipment		\$3,823
3466094	346	Tools, Shop and Equipment	*	\$14,202
4032042	403	Dep. Exp - Dist Resv & Stndpipes		\$1,062
4032043	403	Dep. Exp - T&D Mains		\$5,198
4032046	403	Dep. Exp - Meters		\$289
4032091	403	Dep. Exp - Office Furniture & Equipment		\$257
4032094	403	Dep. Exp - Tools, Shop and Equipment		\$888

Wastewater Adjustment Entries

Utility	NARUC			
Acct. No.	Acct. No.	Acct. Description	<u>Debit</u>	<u>Credit</u>
1084005	108	Acc/Dep - Sewage Treatment Plant	\$488	
1084008	108	Acc/Dep - Sewer Mains		\$24,205
1084091	108	Acc/Dep - Office Furniture & Equipment	\$1,493	
1084094	108	Acc/Dep - Tools, Shop and Equipment	\$574	
1084097	108	Acc/Dep - Communication Equipment	\$9,954	
2151000	215	Retained Earnings	* *	\$138,168
3612008	361	Sewer Mains	\$167,573	
3804005	380	Sewage Treatment Plant		\$2,281
3907091	390	Office Furniture & Equipment	* · · · · · · · · · · · · · · · · · · ·	\$2,983
3937094	393	Tools, Shop and Equipment		\$1,224
3967097	396	Communication Equipment	•	\$13,277
4033005	403	Dep. Exp Sewage Treatment Plant		\$65
4033008	403	Dep. Exp Sewer Mains	\$3,724	
4033091	403	Dep. Exp Office Furniture & Equipment	•	\$199
4033094	403	Dep. Exp Tools, Shop and Equipment		. \$77
4033097	403	Dep. Exp Communication Equipment		\$1,327

EFFECT ON FILING: The utility's water and wastewater 13-month average rate base balances should be reduced by \$220,579 and increased by \$137,260, respectively as of December 31, 2005. The utility's water and wastewater depreciation expense balances should be reduced by \$7,693 and increased by \$2,056 for the 12-month period ended December 31, 2005.

			13-Month	Dep. Expense
Water System	Dec-04	Dec-05	Average	Adjustment
UPIS	(\$63,117)	(\$63,117)	(\$63,117)	(\$2,495)
UPIS	(223,493)	(223,493)	(223,493)	(5,198)
Acc/Dep	16,220	18,715	17,468	,
Acc/Dep	<u>28,586</u>	<u>33,784</u>	48,563	
Rate Base Adjustment	(\$241,804)	(\$234,111)	(\$220,579)	(\$7,693)
			13-Month	Dep. Expense
Wastewater System	Dec-04	Dec-05	<u>Average</u>	Adjustment
UPIS	(\$19,765)	(\$19,765)	(\$19,765)	(\$1,668)
UPIS	167,573	167,573	167,573	<u>3,724</u>
Acc/Dep	10,841	12,509	11,675	*
Acc/Dep	(20,241)	<u>(24,205)</u>	(22,223)	
Rate Base Adjustment	\$138,408	\$136,112	\$137,260	\$2,056

SUBJECT: ADJUSTMENT ORGANIZATION COST AND FRANCHISE FEES

SUMMARY: The utility's water and wastewater average rate base balances are overstated by \$140,959 and \$86,282, respectively, as of December 31, 2005

STATEMENT OF FACT: In its filing, the utility included 13-month average water and wastewater balances of \$1,145 and \$865, respectively, for organization cost. The filing also includes 13-month average water and wastewater balances of \$224,833 and \$87,919, respectively, for franchise fees. None of the above balances were approved in the utility's last rate case proceeding in Docket No. 98067-WS.

The utility, however, did not include the corresponding accumulated depreciation and depreciation expense account general ledger balances for these accounts in the filing.

The utility's general ledger reflects the following accumulated depreciation and depreciation expense balances for organization cost and franchise fees for the periods indicated.

System Water Water	Utility Acct. No. 3011001 3021002	Acct. Description Oranization Cost Franchise Fees	Balance <u>Dec-04</u> \$480 217,765 \$218,245	Balance <u>Dec-05</u> \$480 232.519 \$232,999	13-Month <u>Average</u> \$1,145 * 224,833 \$225,978
Water Water	1083001	Acc/Dep - Oranization Cost Acc/Dep - Franchise Fees	(\$28,035) <u>0</u> (\$28,035)	(\$33,348) <u>0</u> (\$33,348)	(\$30,692) <u>0</u> (\$30,692)
Water Water	4032001 4032***	Dep. Exp Organization Cost Dep. Exp Franchise		\$5,313 <u>0</u> \$5,313	
W/Water W/Water	3511001 3521020	Oranization Cost Franchise Fees	\$429 <u>87,919</u> \$88,348	\$429 <u>87,919</u> \$88,348	\$865 * <u>87,919</u> \$88,784
W/Water W/Water	1084001 1084020	Acc/Dep - Oranization Cost Acc/Dep - Franchise Fees	(\$53) (13,330) (\$13,383)	(\$64) (15,524) (\$15,588)	(\$59) (14,427) (\$14,486)
W/Water W/Water	4033001 4033020	Dep. Exp Organization Cost Dep. Exp Franchise		\$11 <u>2,194</u> \$2,205	

^{*} The 13-month average calculation is skewed because of offsetting debits and credits in June and July of 2005.

The NARUC Uniform System of Accounts established that the balance for organization cost is limited to the original cost incurred that is incident to organizing the utility and putting it into readiness to conduct business. Additionally, Order No. PSC-03-0647-WS, issued, May 28, 2003, determined that costs incurred related to the purchase of a utility system are to be treated as acquisition cost and not organization or franchise cost.

The utility's 2004 addition of \$480 to water organization cost and its 1999 addition of \$429 to wastewater organization cost should be removed per the NARUC rule and Commission order cited above.

The utility's 1998 additions to water and wastewater franchise fees of \$132,445 and \$84,737 should be removed because they appear to include legal and consulting fees paid by the utility to purchase and secure the transfer of the utility at that time. We were not able to complete a full review of these costs because the utility was unable to provide the supporting documentation.

The following schedules provides the details and calculations by the audit staff to remove the organization cost and unsupported franchise fees along with the corresponding effect on accumulated depreciation and depreciation expense balances.

EFFECT ON GENERAL LEDGER: The following journal entries should be made to correct the utility's general ledger balances. The first entry removes unapproved and unsupported organization cost and franchise fees. The second entry records the cumulative effect of the asset balance adjustments.

Utility	NARUC		•	•
Acct. No.	Acct. No.	Acct. Description	<u>Debit</u>	<u>Credit</u>
	121	Non Utility Investments	\$217,662	
2150000	215	Retained Earnings	\$909	
3011001	301	Organization Water	and the second s	\$480
3021002	302	Franchise Water		\$132,925
3511001	351	Organization Wastewater		\$429
3521020	352	Franchise Wastewater		\$84,737
Utility	NARUC		• .	
Acct. No.	Acct. No.	Acct. Description	<u>Debit</u>	<u>Credit</u>
1083001	108	Acc. Dep. Org. & Franchise Water	\$10,171	
1084001	108	Acc. Dep. Org. Wastewater	\$64	
1084020	108	Acc. Dep. Franchise Wastewater	\$14,805	
4032001	403	Depreciation Expense Org. & Franchise Water		\$3,330
4033001	403	Depreciation Expense Org. Wastewater		\$11
4033020	403	Depreciation Expense Franchise Wastewater		\$2,115
2150000	215	Retained Earnings		\$19,585

EFFECT ON FILING: The utility's water and wastewater 13-month average rate base balances should be reduced by \$140,959 (\$131,780 + \$9,179) and \$86,282, (\$85,602 + \$680) respectively, as of December 31, 2005. The utility's water and wastewater depreciation expense balances should be reduced by \$3,330 and \$2,126, (\$2,115 + \$11) respectively, for the 12-month period ended December 31, 2005.

Utility		Balance	Balance	13-Month	Utility	Balance	Balance	13-Month
Acct. No.	Acct. Description	Dec-04	Dec-05	Average	Acct. No.	Dec-04	Dec-05	Average
Water	Organization - Per Utility	\$480	\$480	\$1,145	Water	\$0	\$ 0	\$ 0
3011001	Organization - Per Audit	<u>0</u>	<u>0</u>	<u>o</u>	1083001	<u>0</u>	<u>0</u>	<u>0</u>
	Adjustment	\$480	\$480	\$1,145		\$ 0	\$0	\$0
Water	Franchise - Per Utility	\$217,765	\$232,519	\$224,883	Water	\$0	\$0	\$0
3021002	Franchise - Per Audit	84,840	99,594	91,958	1083001	<u>(8,187)</u> -	(10,171)	<u>(9,179)</u>
	Adjustment	(\$132,925)	(\$132,925)	(\$132,925)		(\$8,187)	(\$10,171)	(\$9,179)
13-Month	Average Adjustment to Water	er Rate Base		<u>(\$131,780)</u>				<u>(\$9.179)</u>
W/Water	Organization - Per Utility	\$429	\$429	\$865	W/Water	\$0	\$ 0	\$0
3511001	Organization - Per Audit	<u>0</u>	<u>0</u>	· <u>0</u>	1084001	<u>0</u>	<u>0</u>	<u>0</u>
	Adjustment	(\$429)	(\$429)	(\$865)		\$0	\$0	\$ 0
W/Water	Franchise - Per Utility	\$87,919	\$87,919	\$87,919	W/Water	\$0	\$0	\$0
3521020	Franchise - Per Audit	3,182	3,182	3,182	1084020	(640)	(719)	<u>(680)</u>
	Adjustment	(\$84,737)	(\$84,737)	(\$84,737)		(\$640)	(\$719)	(\$680)
13-Month	Average Adjustment to Water	er Rate Base		(\$85,602)				(\$680)

Utility Acct. No.	Acct. Description	Balance 12/31/97	Add 1998	Balance 12/31/98	Add 1999	Balance 12/51/99	Add 2000	Balance 12/31/00	Add 2001	Balance 12/31/01	Add 2002	Balance 12/31/02	Add 2003	Balance 12/31/03	Add 2004	Balance 12/31/04	Add 2005	Balance 12/31/05
3011001	Organization	\$0	\$0	\$0	\$0	\$4)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$480	\$480	\$0	\$480
	Staff Adjustment	90	<u>5</u>	<u>0</u>	<u>0</u>	2	<u>0</u>	0	0	<u>0</u>	<u>0</u>	0	0	0	(480)	(480)	0	(480)
	Net Organization Water	\$ 0	\$0	\$o	-\$0	\$0	` \$ 0	\$ 0	<u>\$</u>	\$0	\$0	\$ <u>0</u>	<u></u>	\$ <u>0</u>	\$0	\$0	\$G	\$0
	THE STREET	•	•	•		••	•••	40	40	30	.50	30	30	3 0	40	30	40	30
3021002	Franchise	\$0	\$132,445	\$132,445	\$42,122	\$174,567	\$24,928	\$199,495	\$0	\$199,495	\$0	\$199,495	\$1,472	\$200,967	\$16,798	\$217,765	\$14,754	\$232,519
	Staff Adjustment	<u>o</u>	(132,445)	(132,445)	· Ō	(132,445)	<u>o</u>	(132,445)	. 0	(132,445)	Q	(132,445)	0	(132,445)	(480)	(132,925)	<u>o</u>	(132,925)
	Net Franchise Water	\$0	\$0	\$0	\$42,122	\$42,122	\$24,928	\$67,050	\$0	\$67,050	\$0	\$67,050	\$1,472	\$68,522	\$16,318	\$84,840	\$14,754	\$99,594
3511001	Organization .	\$0	. \$0	\$0	\$429	\$429	\$0	\$429	\$0	\$429	\$0	\$429	\$0	\$429	\$0	\$429	\$0	\$429
	Staff Adjustment	<u>o</u>	<u>o</u>	<u>0</u>	(429)	(429)	Q	(429)	<u>o</u>	(429)	0	(429)	<u>0</u>	(429)	Ō	(429)	<u>o</u>	(429)
	Net Organization WW	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$ G	\$0
3521020	Franchises	\$0	\$84,737	\$84,737	\$3,182	\$87,919	\$0	\$87,919	\$0	\$87,919	\$0	\$87,919	\$0	\$87.919	\$0	\$87,919	\$0	\$87,919
	Staff Adjustment	<u>o</u>	(84,737)	(84,737)	<u>0</u>	(84,737)	0	(84,737)	<u>0</u>	(84,737)	0	(84,737)	Q	(84,737)	<u>0</u>	(84,737)	0	(84,737)
	Net Franchise WW	\$ <u>0</u>	\$0	\$0	\$3,182	\$3,182	\$ 0	\$3,182	\$ <u>0</u>	\$3,182	\$ 0	\$3,182	\$Ô	\$3,182	\$0	\$3,182	\$ 0	\$3,182
Utility		Balance	Add	Balance	Add	Balance	Add	Balance	Add	Balance	Add	Balance	Add	Balance	Add	Balance	Add	Balance
Acct. No.	Acct. Description	12/31/97	1998	12/31/98	1999	12/31/99	2000	12/31/00	2001	12/31/01	2002	12/31/02	2003	12/31/03	2004	12/31/04	2005	12/31/05
1083001	Organization	\$0	\$0	\$0	\$0	\$6	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Staff Adjustment	Õ	0	<u>0</u>	0	o	0	0	Q	0	<u>0</u>	Q	Q	<u>o</u>	6	<u>6</u>	12	<u>18</u> •
	Net Organization Water	\$0	\$ 0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$6	\$6	\$12	\$18
	-																	
1083001	Franchise	\$0	\$0	\$0	(\$3,362)	(\$3,362)	(\$4,399)	(\$7,761)	(\$5,027)	(\$12,788)	(\$5,027)	(\$17,816)	(\$5,027)	(\$22,843)	(\$5,192)	(\$28,035)	(\$5,313)	(\$33,348)
	Staff Adjustment	Ō	<u> </u>	$\underline{\mathbf{o}}$	3,306	<u>3,30€</u>	3,306	6,612	3,306	<u>9.917</u>	3,306	13,223	3,306	16,529	3,312	19,841	3,318	23,159
	Net Franchise Water	20	\$0	\$0	(\$56)	(\$56)	(\$1,093)	(\$1,150)	(\$1,721)	(\$2,871)	(\$1,722)	(\$4,592)	(\$1,721)	(\$6,314)	(\$1,880)	(\$8,194)	(\$1,995)	(\$10,189)
	Plus Organization														(01.074)	<u>6</u> (\$8,188)	<u>12</u> (\$1,983)	18 (\$10,171) *
	Net to account 1083001							;							(\$1,874)	(30,100)	(21,303)	(\$10,171)
1084001	Organization	\$0	\$0	\$0	\$0	\$ e	(\$11)	(\$11)	(\$11)	(\$21)	(\$11)	(\$32)	(\$11)	(\$43)	(\$11)	(\$53)	(\$11)	(\$64)
1084001	Organization Staff Adjustment	\$0 <u>G</u>	\$0 <u>0</u>	\$0 <u>0</u>	\$0 <u>0</u>	\$e <u>0</u>	(\$11) <u>11</u>	(\$11) 11	(\$11) 11	(\$21) 21	(\$11) 11	32	<u>11</u>	<u>43</u>	ìщ́	54	`11	64
1084001							. ,	` ,		. ,				` '	` '		, ,	
1084001	Staff Adjustment Net Organization WW	<u>C</u>	0	<u>0</u>	<u>0</u>	0	11	`11	11	21	11	32	<u>11</u>	<u>43</u>	ìщ́	54	\$0° (\$2,194)	64 \$0 (\$15,524)
	Staff Adjustment Net Organization WW	<u>c</u> \$0	\$0	<u>0</u> \$0	<u>0</u> \$0	<u>G</u> \$0	1 <u>i</u> \$0	11 \$0	\$0	\$0	\$0	32 \$0	\$0	\$0	\$0	\$4 \$0	\$0°	<u>64</u> \$0

^{*} The utility included the Organization depreciation balance as part of Franchise Fee accumulated depreciation.

SUBJECT: ADJUSTMENT TO RETIRE UTILITY PLANT IN SERVICE

SUMMARY: The utility's 13-month average wastewater rate base balance is understated by \$3,942 as of December 31, 2005.

STATEMENT OF FACT: The utility recorded two capital additions to utility plant in service that should have included a corresponding retirement amount. The utility's policy is to retire 75 percent of the capital assets purchase price when the original cost can not be determined.

The utility recorded the following invoices to its construction project ledger in 1999. The invoices were requested as part of our audit sample of UPIS additions for the period 1998 through 2005.

Construction Project No.	Invoice Ref. No. and Vendor	<u>Amount</u>	Total Project	Activity
116-99-07	16172*09128*Sunshine	\$9,998	\$10,554	Replace 16" steel pipe connecting the three Wekiva W/Water plants icluding supports and connections
116-99-12	2414*09128*Thompson	\$17,074		Electrical work at Wekiva W/Water plant to replace blower starter on #2 blower

Project No. 116-99-07 was closed out and posted to Acct. No. 3804005 in December 1999 and Project No. 116-99-12 was closed out and posted to the same account in December 2000.

The schedule below calculates the retirements and the corresponding cumulative effect on the utility's rate base balance.

ı.	Project	Year Placed in Service	Utility Acct. No.	NARUC Acct. No.	Amount .	75% <u>Retirement</u>	Dep. <u>Rate</u>	Dep. Exp. Adjustment	Depreciation Years	Acc/Dep Adjustment
	1169907	1999	3804005	380	\$10,554	(\$7,916)	2.86%	(\$226)	6.5	(\$1,471)
	1169912	2000	3804005	380	\$20,938	(\$15,704)	2.86%	(\$449)	. 5.5	(\$2,470)
	To	otal Adjustment				(\$23.619)		<u>(\$676)</u>		(\$3,942)

13-Month average adjustment equals year end adjustment

EFFECT ON GENERAL LEDGER: The following journal entries should be made to correct the utility's general ledger balances.

Utility	NARUC			
Acct. No.	Acct. No.	Acct. Description	<u>Debit</u>	<u>Credit</u>
1084005	108	Acc/Dep - Wastewater Treatment Plant	\$27,561	
2151000	215	Retained Earnings		\$3,266
3804005	380	Wastewater Treatment Plant	and the second second	\$23,619
4033005	403	Dep. Exp Wastewater Treatment Plant	•	\$676

Acct. No. 1084005 adjustment of 27,561 = 23,619 + 3,942

EFFECT ON FILING: The utility's 13-month average wastewater rate base balance should be increased by \$3,942 (\$27,561 - \$23,619) as of December 31, 2005. Additionally, the utility's wastewater depreciation expense balance should be reduced by \$676 for the 12-month period ended December 31, 2005.

SUBJECT: ADJUSTMENT TO REMOVE ALLOWANCE FOR FUNDS USED DURING CONSTRUCTION (AFUDC)

SUMMARY: The utility's 13-month average water and wastewater rate base balances are overstated by \$13,943 (\$15,620 - \$1,677) and \$301,732 (\$329,233 - \$27,501), respectively, as of December 31, 2005.

STATEMENT OF FACT: The utility's records indicate that it accrued AFUDC on construction projects during the period 2000 - 2001. The rate that the utility used was approved for a sister subsidiary, Utilities Inc. of Florida. A search of Commission records indicates that the utility did not receive an approved AFUDC rate until one was established in Order No. PSC-04-0262-PAA-WS dated March 8, 2004, which determined a uniform rate for all of the Utilities, Inc. Florida systems. The uniform AFUDC rate became effective January 1, 2002 and was not allowed to be applied retroactively.

Rule 25-30.116 (5), F.A.C. states that no utility can charge or change an AFUDC rate without prior Commission approval.

The utility's AFUDC accruals to construction projects for the periods 2000 and 2001 that were posted to UPIS along with the cumulative effect on the corresponding accumulated depreciation and depreciation expense account balances should be removed. The following schedules show the amount of AFUDC charged to the respective construction projects, the account the project was closed to and the calculation of the corresponding accumulated depreciation and depreciation expense adjustments that are required.

Water Projects

<u>Project No.</u> IDC#115-00-03 IDC#115-99-11	Year Posted to UPIS 2000 2000	Utility Acct. No. 3113025 3113025	NARUC <u>Acct. No.</u> 311 311	Years in Service 5.5	AFUDC <u>Adjustment</u> (\$261) (299) (\$560)	Dep. Rate 5.00% 5.00%	Dep. Exp. <u>Adjustment</u> (\$13) (15) (\$28)	Acc/Dep <u>Adjustment</u> (\$72) (<u>82)</u> (\$154)
IDC#115-01-02	2004	3204032	320	1.5	(\$94)	4.55%	(\$4)	(\$6)
IDC#115-00-01 IDC#115-00-05	2000 2000	3305042 3305042	330 330	5.5 5.5	(\$148) (100) (\$248)	2.70% 2.70%	(\$4) (<u>3)</u> (\$7)	(\$22) (<u>15)</u> (\$37)
IDC#115-00-02 IDC#115-00-04 IDC#115-01-01 IDC#115-00-04 IDC#115-00-06 IDC#115-00-02	2001 2002 2001 2002 2000 2001	3315043 3315043 3315043 3315043 3315043	331 331 331 331 331 331	4.5 3.5 4.5 3.5 5.5 4.5	(\$7,339) (2,104) (338) (650) (57) (4,228) (\$14,716)	2.33% 2.33% 2.33% 2.33% 2.33% 2.33%	(\$171) (49) (8) (15) (1) (98) (\$343)	(\$769) (171) (35) (53) (7) (443) (\$1,479)
IDC#115-99-13 Total Water Adjustment	2000	3335045	333	5.5	(\$2) (\$15.620)	2.50%	(\$0) <u>(\$382)</u>	(\$0) <u>(\$1.677)</u>

Wastewater Projects

5.5000.4.5	Year Posted	Utility	NARUC	Years in	AFUDC	Dep.	Dep. Exp.	Acc/Dep
Project No.	to UPIS	Acct. No.	Acct. No.	<u>Service</u>	Adjustment	Rate	Adjustment	Adjustment
IDC#116-00-07	2001	3542011	354	4.5	(\$3,814)	3.34%	(\$127)	(\$573)
IDC#116-00-02	2000	3542011	354	5.5	(666)	3.34%	(22)	(122)
IDC#116-00-03	2000	3542011	354	5.5	(82)	3.34%	(3)	(15)
IDC#116-00-07	2001	3542011	354	4.5	(1,095)	3.34%	(37)	(164)
					(\$5,657)		(\$189)	(\$874)
IDC#116-01-04	2001	3602007	360	4.5	(\$70)	3 34%	(\$2)	(\$11)
IDC#116-00-06	2002	3752008	375	3.5	(\$303,517)	2.33%	(\$7,072)	(\$24,752)
IDC#116-00-06	2002	3752008	375	3.5	(16,390)	2.33%	(382)	(1,337)
					(\$319,907)	5 n	(\$7,454)	(\$26,088)
IDC#116-00-05	2001	3804005	380	4.5	(\$143)	2.86%	(\$4)	(\$18)
IDC#116-01-02	2001	3804005	380	4.5	(809)	2.86%	(23)	(104)
IDC#116-01-05	2001	3804005	380	4.5	(286)	2.86%	(8)	(37)
IDC#116-99-10	2000	3804005	380	5.5	(61)	2.86%	(2)	(10)
IDC#116-00-01	2000	3804005	380	5.5	(2,042)	2.86%	(58)	(321)
IDC#116-00-04	2000	3804005	380	5.5	(213)	2.86%	(6)	(33)
IDC#116-99-14	2000	3804005	380	3.5	(45)	2.86%	(1)	(4)
					(\$3,599)		(\$103)	(\$527)
Total Wastewater Adju	ıstment				(\$329,233)		<u>(\$7,748)</u>	(\$27,501)

EFFECT ON GENERAL LEDGER: The following journal entries should be made to correct the utility's general ledger balances.

Utility	NARUC			
Acct. No.	Acct, No.	Acct. Description	<u>Debit</u>	Credit
1083025	108	Acc/Dep - Pumping Equipment	\$154	
1083032	108	Acc/Dep - Water Treatment Equip.	\$6	
1083042	108	Acc/Dep - Distr. Reservoirs & Stand.	\$37	
1083043	108	Acc/Dep - T&D Mains	\$1,479	
1084011	108	Acc/Dep - Lift Stations	\$874	
1084005	108	Acc/Dep - Treatment & Disposal	\$527	
1084007	103	Acc/Dep - Sewer Services	\$11	
1085008	108	Acc/Dep - Reuse T&D Mains	\$26,088	
2151000	215	Retained Earnings	\$323,807	
3113025	311	Pumping Equipment		\$560
3204032	320	Water Treatment Equip.		\$94
3305042	330	Distr. Reservoirs & Stand.		\$248
3315043	331	T&D Mains		\$14,716
3335045	333	Water Services		\$2
3542011	354	Lift Stations		\$5,657
3602007	360	Sewer Services		\$70
3752008	375	Reuse T&D Mains		\$319,907
3804005	380	Treatment & Disposal		\$3,599
4032025	403	Dep. Exp Pumping Equipment		\$28
4032032	403	Dep. Exp Water Treatment Equip.		\$4
4032042	403	Dep. Exp Distr. Reservoirs & Stand.		\$7
4032043	403	Dep. Exp T&D Mains		\$343
4033005	403	Dep. Exp Treatment & Disposal		\$103
4033007	403	Dep. Exp Sewer Services		\$2
4033011	403	Dep. Exp Lift Stations		\$189
4037008	403	Dep. Exp Reuse T&D Mains		\$7,454

EFFECT ON FILING: The utility's 13-month average water and wastewater rate base balances should be reduced by \$13,943 (\$15,620 - \$1,677) and \$301,732 (\$329,233 - \$27,501), respectively, as of December 31, 2005. The utility's water and wastewater depreciation expense balances should be reduced by \$382 and \$7,748, respectively, for the 12-month period ended December 31, 2005.

SUBJECT: ADJUSTMENT TO ALLOCATE TRANSPORTATION EQUIPMENT

SUMMARY: The utility's 13-month average water and wastewater rate base balances are understated by \$16,158 and \$12,354, respectively, as of December 31, 2005

STATEMENT OF FACT: The audit staff, at the request of The Division of Economic Regulation, performed an audit of Alafaya Utilities, Inc., a sister subsidiary of Sanlando Utilities, Corp. in Docket No. 060256-SU. The scope of the audit included a review of Alafaya's rate base components as of December 31, 2005. The audit report, issued October 6, 2006, included specific adjustments that reduced Alafaya's rate base by allocating a percentage of the original cost, accumulated depreciation and test year depreciation expense for a dump truck purchased in 2004 to Sanlando Utilities Corp. based on estimated use.

Utility personnel indicated that the dump truck is primarily used at Alafaya, Sanlando Utilities Corp. and Utilities, Inc. of Florida approximately 18.43 percent, 53.57 percent and 28.0 percent respectively, during the test year. The depreciation rate is 16.67 percent per Rule 25-30.140 F.A.C. An allocation of the dump truck based on its original cost and estimated use provided by the utility is calculated below.

As of 12/31/2005	Percentage	Original Cost	Accumulated Depreciation	Depreciation Expense
Totals	100.00%	\$63,869	<u>\$15,971</u> *	\$10,647
Alafya	18.37%	\$11,733	\$2,934	\$1,956
Sanlando	53.57%	\$34,215	\$8,555	\$5,704
UIF	~~ ~ 28.00%	\$17,922	\$4,481	\$2,988

^{*} Based on 1.5 years of annual depreciation expense accruals

EFFECT ON GENERAL LEDGER: The following entries are needed to correct the utility's general ledger balances to properly record the dump truck allocation discussed above. Allocations between water and wastewater systems are done for rate case proceedings.

NARUC Acct. No.	Account Description	<u>Debit</u>	Credit
1082000	Acc/Dep - Transportation Equipment		\$8,555
2151000	Retained Earnings		\$31,364
3917000	Transportation Equipment	\$34,215	
4032092	Dep. Expense - Transportation Equipment	\$5,704	

EFFECT ON FILING: The utility's 13-month average water and wastewater rate base balances should be increased by \$16,158 and \$12,354, respectively, as of December 31, 2005 and water and wastewater depreciation expense balances should be increased by \$3,232 and \$2,472 for the 12-month period ended December 31, 2005.

Utilit <u>Acct. 1</u>	•	NARUC cct. No.	Accou	nt Descr	ription					<u>Total</u>	<u>[</u>	Wat	<u>er</u>	<u>W/Water</u>	
10820	00	108	Acc/D	ep - Tra	nsportati	on Equip	pment			(\$8,555)		(\$4,84	8)	(\$3,707)	
39170	00 3	41/391	Transp	ortation	Equipm	ent			;	\$34,215		\$19,39	0	\$14,825	
40320	92	403	Dep. E	Expense	- Transp	ortation	Equipme	ent		\$5,704		\$3,23	2	\$2,472	
			Sanlar	do Cust	omers					100.00%	· · · ·	56.67	%	43.33%	
Water UPIS Acc/Dep Net	<u>Dec-04</u> \$19,390 (1.616) \$17,774	Jan-05 \$19,390 (1.885) \$17,505	Feb-05 \$19,390 (2,155) \$17,235	Mar-05 \$19,390 (2,424) \$16,966	Apr-05 \$19,390 (2,693) \$16,697	May-05 \$19,390 (2,963) \$16,427	<u>Jun-05</u> \$19,390 (3,232) \$16,158	Jul-05 \$19,390 (3,501) \$15,889	Aug-05 \$19,390 (3,771) \$15,619	<u>Sep-05</u> \$19,390 (4,040) \$15,350	Oct-05 \$19,390 (4,309) \$15,081	Nov-05 \$19,390 (4,579) \$14,811	Dec-05 \$19,390 (4.848) \$14,542	13-Month Average \$19,390 (3,232) \$16,158	
W/Water	Dec-04	<u>Jan-05</u>	Feb-05	<u>Mar-05</u>	Apr-05	May-05	<u>Jun-05</u>	<u>Jul-05</u>	<u>Aug-05</u>	<u>Sep-05</u>	Oct-05	<u>Nov-05</u>	Dec-05	13-Month Average	
UPIS .	\$14,825	\$14,825	\$14,825	\$14,825	\$14,825	\$14,825	\$14,825	\$14,825	\$14,825	\$14,825	\$14,825	\$14,825	\$14,825	\$14,825	
Acc/Dep	(1,237)	(1,442)	(1,648)	(1,854)	(2,059)	(2,265)	(2,471)	(2.677)	(2,883)	(3.089)	(3,295)	(3,501)	(3,707)	(2,472)	
Net	\$13,588	\$13,383	\$13,177	\$12,971	\$12,766	\$12,560	\$12,354	\$12,148	\$11,942	\$11,736	\$11,530	\$11,324	\$11,118	\$12,354	

SUBJECT: ADJUSTMENT TO LAND

SUMMARY: The utility's 13-month average water rate base is overstated by \$6,800 as of December 31, 2005.

STATEMENT OF FACT: The utility posted a \$5,000 amount to Acct. No. 3036010 - Land & Land Rights in 1998 that it said was for the acquisition of an easement to relocate a water main. In addition, the utility posted an invoice for \$1,800 in 1999 for an appraisal of property that it was interested in purchasing.

The utility could not provide any original source documentation, other than the journal entry, to support the \$5,000 easement acquisition discussed above and it never purchased the property that was appraised in 1999.

The balance in Acct. No. 3036010 should be reduced by \$6,800 because of the reasons stated above.

EFFECT ON GENERAL LEDGER: The following entries are needed to correct the utility's general ledger balances.

Utility Acct. No.	NARUC Acct. No.	Account Description	<u>Debit</u>	Credit
2151000	215	Retained Earnings	\$6,800	
3034030	303	Land & Land Rights (Treatment Plt.)		\$5,000
3036010	303	Land & Land Rights		\$1,800

EFFECT ON FILING: The utility's water land balance should be reduced by \$6,800 as of December 31, 2005. The 13-month average adjustment equals the year end adjustment because it should be applied to year end 2004 and 2005 balances.

SUBJECT: ADJUSTMENT TO CONTRIBUTION IN AID OF CONSTRUCTION

SUMMARY: The utility's 13-month average water and wastewater rate base balances are overstated by \$266,012 and \$361,515, respectively, as of December 31, 2005.

STATEMENT OF FACT: Order Nos. PSC-00-011-PAA-WS and PSC-00-1263-PAA-WS, issued July, 10, 2000, required the utility to credit contributions in aid of construction (CIAC) for water and wastewater overearnings of \$138,460 and \$260,432 in 1997 and 1998 and \$407,009 in 1999. The second order did not specify the distribution between the water and wastewater CIAC credit amount. The utility posted the combined credits to water and wastewater CIAC for \$340,475 and \$465,423 in 2000 after the orders were issued.

In 2005, the utility posted adjustments to water and wastewater CIAC balances for the above orders a second time and included adjustments to accumulated amortization of CIAC and CIAC amortization expense for the cumulative effect since year 2000.

The utility's 2005 adjustment needs to be reversed to eliminate the duplicate entry.

EFFECT ON GENERAL LEDGER: The following entries are needed to correct the utility's general ledger balances.

Utility	NARUC			
Acct. No.	Acct. No.	Account Description	<u>Debit</u>	<u>Credit</u>
2151000	215	Retained Earnings	1	\$649,900
2711000	271	Water - CIAC	\$340,475	
2721000	271	Wastewater - CIAC	\$465,423	
2722000	272	Water - Acc/Amortz. Of CIAC	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	\$74,463
2723000	272	Wastewater - Acc/Amortz. Of CIAC		\$103,908
4071000	407	Water -CIAC Amortz. Exp.	\$8,829	
4073000	407	Wastewater -CIAC Amortz. Exp.	\$13,544	

EFFECT ON FILING: The utility's 13-month average water and wastewater rate base balances should be reduced by \$266,012 (\$340,475 - \$74,463) and \$361,515, (\$465,423 - \$103,908) respectively, as of December 31, 2005. The utility's net depreciation expense balances should be increased by \$8,829 and \$13,544, respectively, for the 12-month period ended December 31, 2005. The 13-month average adjustments are the total adjustment because the utility included the adjustments in its 13-month average calculation as if it was posted prior to December 2004.

SUBJECT: ADJUSTMENT TO ACCUMULATED DEPRECIATION

SUMMARY: The utility's 13-month average water and wastewater rate base balances are overstated by \$9,344 and understated by \$7,144, respectively, as of December 31, 2005.

STATEMENT OF FACT: The utility's general ledger reflects the following balances in the indicated accounts for its main frame computer system.

Utility				13-Month
Acct. No.	Acct. Description	Dec-04	Dec-05	<u>Average</u>
3406110	Computer System Cost	\$20,295	\$20,295	\$20,295
3406150	Computer System Amort.	(\$15,219)	(\$17,756)	(\$16,488)
6369009	Computer Amortization		\$2,537	

The 13-month average balance was calculated based on monthly general ledger activity.

The utility's filing included the balance for Acct. No. 3406110 in Acct. No. 348 - Other Tangible Plant for water rate base while Acct. No. 6369009 was allocated between water and wastewater to O&M expense Acct. Nos. 635 and 735 - Contractual Services. Although the amortization expense balance should have been included as depreciation expense in the filing, changing the amount from O&M expense to depreciation expense does not affect net operating income.

The utility, however, should have included the corresponding accumulated amortization account in the filing and it should be allocated between water and wastewater operations as the utility did for the amortization expense balance.

EFFECT ON GENERAL LEDGER: There is no effect on the general ledger because the allocation between water and wastewater operations is for rate filing purposes only.

EFFECT ON FILING: The utility's 13-month average water and wastewater rate base balances should be reduced by \$9,344 and increased by \$7,144, respectively, as of December 31, 2005. No expense adjustment is needed because it was already allocated between water and wastewater operations for the test year.

Customers	100.00%	56.67%	43.33%
Per Audit	Total	Water	W/Water
Computer System	\$20,295	\$11,501	\$8,794
Acc/Amortz Computer	<u>(16,488)</u>	(9,344)	<u>(7,144)</u>
	\$3,807	\$2,157	\$1,650
Per Utility Filing			
Computer System	\$20,295	\$11,501	\$8,794
Acc/Amortz Computer	<u>o</u>	<u>0</u>	<u>0</u>
	\$20,295	\$11,501	\$8,794
13-Month Average Adjustment	<u>(\$16,488)</u>	<u>(\$9,344)</u>	<u>(\$7.144)</u>

SUBJECT: ADJUSTMENT TO ALLOCATED WSC RATE BASE

SUMMARY: The utility's allocated 13-month average net rate base from Water Service Corporation (WSC) is \$135,675 as of December 31, 2005. The balance should be further allocated to water and wastewater operations for \$76,886 and \$58,788, respectively.

STATEMENT OF FACT: WSC, the service corporation for the parent company Utilities, Inc., allocates a portion of its common rate base to each subsidiary utility throughout the United States. Sanlando Utilities Corp. received \$110,575, which is the 13-month average amount as of December 31, 2005. The allocation is net of accumulated depreciation and accumulated deferred income taxes or approximately 6.35 percent of the total WSC average net rate base of \$1,740,155. The allocation was calculated using a customer equivalent percentage that equates all customers throughout the United States in terms of equivalent residential connections.

The Commission's Division of Regulatory Compliance and Consumer Assistance, at the request of The Division of Economic Regulation, performed an affiliate transaction audit of Utilities, Inc. and its subsidiary WSC for the 12-month period ended December 31, 2005, in Docket No. 060253-WS. The scope of the audit included a review of the WSC rate base components that are allocated to all of its subsidiary operations in 2005. The audit report, issued July 15, 2006, included specific adjustments that increased Sanlando Utilities Corp. allocated 13-month average WSC rate base allocation by \$25,099 to \$135,674.

The audit staff has incorporated the findings of the above-mentioned audit report to determine Sanlando Utilities Corp. allocated 13-month average WSC rate base balance of \$135,674 for this proceeding.

EFFECT ON GENERAL LEDGER: None, because WSC only allocates its net rate base for rate case proceedings.

EFFECT ON FILING: Increase the utility's 13-month average water and wastewater rate base balances by \$14,224 and \$10,875, respectively, for the 12-month period ended December 31, 2005.

	Total		Allocation		Allocation
13-Month Average	Amount	Water	Percent	W/Water	Percent
Per Utility Allocated Rate Base	\$110,575	\$62,663	56.67%	\$47,912	43.33%
Per Audit Allocated Rate Base	<u>135,674</u>	<u>76,886</u>	56.67%	58,788	43.33%
Audit Adjustment	\$25,099	\$14,224		\$10,875	

Small differences are due to rounding

SUBJECT: ADJUSTMENT TO WORKING CAPITAL

SUMMARY: The utility's 13-month average water and wastewater rate base are understated by \$122,069 and \$44,621, respectively, as of December 31, 2005.

STATEMENT OF FACT: The utility's filing reflects a 13-month average working capital allowance of \$407,181 as of December 31, 2005, which is allocated to water and wastewater rate base in the amounts of \$115,186 and 291,995, respectively.

Order No. PSC-03-1440-FOF-WS, issued December 22, 2003, determined that Utilities, Inc. of Florida, a sister subsidiary of Sanlando Utilities Corp., should allocate its working capital balance between water and wastewater operations based on the respective percentage of its operation and maintenance expense balances.

The utility's water and wastewater working capital balances are understated by \$122,069 and \$44,621, respectively, as of December 31, 2005, because of the following audit staff determinations.

- 1. The utility's working capital calculation includes \$123,053 of customer deposits which should be removed because they are a component of the utility's capital structure.
- 2. The utility's balances for accounts receivable, deferred debits, materials and supplies, miscellaneous accrued assets, and accrued taxes do not reconcile to its general ledger balance and(or) the 13-month average calculation.
- 3. The utility allocated its working capital allowance between water and wastewater rate base using a combination of revenues, customers and gross plant percentages rather then O&M expense percentage which was used for a subsidiary system in the above-mentioned order.

The audit staff's adjustments are indicated below and our calculations are displayed on the following page.

13-Month Average Working Capital	Total	Water	Wastewater
Per Audit Calculation	\$573,871	\$237,255	\$336,616
Per Utility Filing (MFR Schedules A-1 & A-2)	407,181	115,186	<u>291,995</u>
Audit Adjustment	\$166,690	\$122,069	\$44,621

EFFECT ON GENERAL LEDGER: None, because a working capital adjustment is only calculated for rate case proceedings.

EFFECT ON FILING: The utility's water and wastewater 13-month average rate base should be increased by \$122,069 and \$44,621, respectively, as of December 31, 2005.

	End	neral Ledger ding Balance 1) 12/31/2005	13-Month Average Balance	Water	W/Water
Current & Accrued Assets					
Cash		\$0	(\$35)	(\$14)	(\$21)
Special Deposits		250	212	88	124
Accounts & Notes Receivable		704,177	643,234	265,932	377,302
Deferred Debits - Rate Case Exp	ense	0	0	0	0
Deferred Debits - Other		31,149	40,599	16,785	23,814
Materials & Supplies		12,636	12,636	5,224	7,412
Miscellaneous		0	1,865	771	1,094
Current & Accrued Liabilities					
Accounts Payable		(38,725)	(16,768)	(6,932)	(9,836)
Accrued Taxes		(115,000)	(115,000)	(47,544)	(67,456)
Accrued Interest		5,031	7,128	2,947	4,181
Miscellaneous		<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Working Capital		- \$599,518	\$573,871	\$237,255	\$336,616
Working Capital - 13-Month Avera	ge	\$3,405,890		\$573,871	
and the second second	Per MFR	Adjustment	Per Aud	it Explanation	for Adjustment
Current & Accrued Assets			F		er.
Cash	(\$35)	\$0	(\$35	5)	
Special Deposits	212	0	212		
Accounts & Notes Receivable	0.5,250	38	643,234	•	
Deferred Debits	0	40,599	40,599	•	
Materials & Supplies	11,664	972	12,636	•	
Miscellaneous	933	932	1,865	5 Adjust to G/	L balance
Current & Accrued Liabilities				·· .	d -
Accounts Payable	(16,768)		(16,768	B)	
Customer Deposits	(123,053)	,	(
Accrued Taxes	(116,096)	1,096	(115,000)) Adjust to G/	L balance
Accrued Interest	7,128	0	7,128	3	
Working Capital					
13-Month Average	\$407,181	\$166,690	\$573,871	· ————————————————————————————————————	

SUBJECT: ADJUSTMENT TO O&M EXPENSE

SUMMARY: The utility's water and wastewater O&M expense balances are overstated by \$50,005 and \$240, respectively, for the 12-month period ended December 31, 2005.

STATEMENT OF FACT: The audit staff's sample of test year O&M expense accounts determined that the following invoices, posted by the utility in it 2005 general ledger, were recorded in error or they are not supported by adequate documentation.

					56.67%	43.33%
Item	Utility	NARUC		Total	Water	W/Water
<u>No.</u>	Acct. No.	Acct. No.	Invoice Ref# and Vendor	<u>Amount</u>	Amount	Amount
1	6501030	650/750	81250*13603*Bobcat of	\$2,137	\$1,211	\$926
- 2	6755070	620	85330*13098*CPH Engin	7,500	7,500	0
3	6755090	620	82247*14641*Fields &	3,400	3,400	0
4	6755090	620	80951*14187*Nortrax	4,517	4,517	0
5	6755090	620	Close W/O 115-04-09	29,601	29,601	0
6	6759081	620	74476*00831*Locke Well	3,775	3,775	0
6	6759081	620	75260*18025*Aabot Fence	1,562	1,562	0
6	6759081	620	99662*13095*Green's	3,291	3,291	0
7	7754006	720	77609*11789*B&B Steel	<u>1,500</u>	0	<u>1,500</u>
				\$57,283	\$54,857	\$2,426

The audit staff has determined the following concerning the above utility invoices.

- 1) The invoice in Item No. 1 relates to the utility's purchase of four new tires for a new BobCat that was previously bought. The original tires did not adequately fulfill the needs for the utility's use of the BobCat so they had to be replaced. The utility should have posted the new tires to the transportation account where the BobCat was originally recorded and depreciated them using the required Commission rate.
- 2) The invoice in Item No. 2 relates to engineering fees incurred for the five year renewal of the utility's wastewater groundwater permit. The entire amount should have been posted to a deferred asset account and amortized to wastewater O&M expense over the five year permit period.
- 3) The invoice in Item No. 3 relates to a major maintenance repair of a tractor that is used to maintain the wastewater percolation ponds as well as other utility operations. The tractor is recorded in the transportation account and allocated between water and wastewater operations. Major repairs such as these would not be of a recurring nature and should be posted to a deferred asset account and amortized to water and wastewater O&M expenses over five years.
- 4) The invoice in Item No. 4 relates to removal and disposal of construction debris that had accumulated over the years as the utility repaired and maintained systems. Major expenses such as these would not be of a recurring nature and should be posted to a deferred asset account and amortized to water and wastewater O&M expenses over five years.
- 5) The work order referenced in Item No. 5 relates to the costs incurred by the utility to clean up a fuel spill at the Wekiva plant in 2004. The utility opened Construction Project No. 115-04-09 in 2004 and recorded an invoice for \$27,974 from Aradaman & Associates. The difference of \$1,627 (\$29,601 -

- \$27,974) is for \$471 of capitalized labor and \$1,156 of allowance for funds used during construction (ADUDC) that were also posted in 2004. In December 2005 the utility decided to transfer the balance of the construction project account to O&M expense rather then an asset account. Since the project was not capitalized the AFUDC accrual should be removed. The balance of \$28,445 (\$29,601 \$1,156) should be posted to a deferred asset account and amortized over ten years since it is a non-recurring and highly unusual expense.
- 6) The invoices in Item No. 6 relate to utility costs incurred for the 2004 hurricane season and paid in 2005 and costs incurred for the 2005 hurricane season. The invoices reviewed totaled \$8,628, however, the balance in the account was \$10,024 for the test year 2005. Major expenses such as these would not be of a recurring nature and should be posted to a deferred asset account and amortized to water and wastewater O&M expenses over four years. This was the case for another utility system in Order No. PSC-06-0170A-PAA-WS, issued March 1, 2006.
- 7) The invoice in Item No. 7 relates to recorded costs for an invoice that the utility was not able to provide when requested and should be removed.

The following adjustments are needed to correct the utility's books and records per the audit staff determinations above.

	Utility	NARUC			
Item No.	Acct. No.	Acct. No	<u>Amount</u>	Water	Wastewater
	6501030	650/750	(\$2,137)	(\$1,211)	(\$926)
1	3917000	341/391	\$2,137	\$1,211	\$926
_	4032092	403	\$178	\$101	\$77
	1082000	108	(\$178)	(\$101)	(\$77)
			(, , , ,	(4-1-7)	(***)
	6755070	620	(\$7,500)	(\$7,500)	\$0
2	6759080	720	\$1,500	\$0	\$1,500
	1862***	186	\$7,500	\$0	\$7,500
	1865***	186	(\$1,500)	\$0	(\$1,500)
	6755090	620	(\$3,400)	(\$3,400)	\$ 0 ·
3	6759080	620/720	\$680	\$385	\$295
	1862***	186	\$3,400	\$1,927	\$1,473
	1865***	186	(\$680)	(\$385)	(\$295)
	6755090	620	(\$4,517)	(\$4,517)	\$0
4	6759080	620/720	\$903	\$512	\$391
٠,	1862***	186	\$4,517	\$2,560	\$1,957
	. 1865***	186	(\$903)	(\$512)	(\$391)
*	. 1005	100	(4703)	(4014)	(4351)
	6755090	620	(\$29,601)	(\$29,601)	\$0
5	6759080	620	\$2,845	\$2,845	\$0.
*	1862***	186	\$28,445	\$28,445	\$0
	1865***	186	(\$2,845)	(\$2,845)	\$0
	6759081	620	(\$10,024)	(\$10,024)	\$0
6 .	6759080	620	\$2,506	\$2,506	\$0
•	1862***	186	\$10,024	\$10,024	\$0
	1865***	186	(\$2,506)	(\$2,506)	\$0
7	7754006	720	(\$1,500)	\$0	(\$1,500)

EFFECT ON GENERAL LEDGER: The following entries are needed to correct the utility's general ledger balances.

NARUC			
Acct. No.	Account Description	<u>Debit</u>	Credit
108	Water Acc/Dep - Transportation Equip.		\$151
108	W/Water Acc/Dep - Transportation Equip.	V 4	\$116
186	Deferred Assets	\$45,452	
186	Acc/Amortz, of Deferred Assets		\$8,085
215	Retained Earnings	\$10,741	
341	Water - Transportation Equip.	\$1,211	
391	W/Water Transportation Equip.	\$926	
403	W/Water Dep. Exp Transportation Equip.	\$151	
403	Water Dep. Exp Transportation Equip.	\$116	
650	Water - Transportation Exp.	•	\$1,211
750	W/Water - Transportation Exp.		\$926
620	Water - Materials & Supplies		\$7,500
620	Water - Materials & Supplies		\$37,518
620	Water - Materials & Supplies	\$6,248	
720	W/Water - Materials & Supplies	\$2,186	
620	Water - Materials & Supplies		\$10,024
720	W/Water - Materials & Supplies		\$1,500
	Acet. No. 108 108 186 186 215 341 391 403 403 650 750 620 620 620 720 620	Acct. No. Account Description 108 Water Acc/Dep - Transportation Equip. 108 W/Water Acc/Dep - Transportation Equip. 186 Deferred Assets 186 Acc/Amortz. of Deferred Assets 215 Retained Earnings 341 Water - Transportation Equip. 391 W/Water Transportation Equip. 403 W/Water Dep. Exp Transportation Equip. 403 Water Dep. Exp Transportation Equip. 650 Water - Transportation Exp. 750 W/Water - Transportation Exp. 620 Water - Materials & Supplies 620 Water - Materials & Supplies 620 Wywater - Materials & Supplies 620 Water - Materials & Supplies	Acct. No.Account DescriptionDebit108Water Acc/Dep - Transportation Equip.108W/Water Acc/Dep - Transportation Equip.186Deferred Assets\$45,452186Acc/Amortz. of Deferred Assets215Retained Earnings\$10,741341Water - Transportation Equip.\$1,211391W/Water Transportation Equip.\$926403W/Water Dep. Exp Transportation Equip.\$151403Water Dep. Exp Transportation Equip.\$116650Water - Transportation Exp.750W/Water - Transportation Exp.620Water - Materials & Supplies620Water - Materials & Supplies

EFFECT ON FILING: The utility's water and wastewater O&M expense balances should be reduced by \$50,005 and \$240, respectively, for the 12-month period ended December 31, 2005. The utility's 13-month average rate base balances should be increased by \$780 and \$597, respectively, as of December 31, 2005 and water and wastewater depreciation expense balances should be increased by \$116 and \$151, respectively for the 12-month period ended December 31, 2005. The utility's 13-month average water and wastewater working capital allowance should be increased by \$7,209 and \$10,229, respectively as of December 31, 2005. (\$17,438 x 41.34% water and 58.66% wastewater allocation per Audit Finding No. 11 of this report)

O&M Expense Adjustments

Utility	NARUC				Water	W/Water
Acct. No.	Acct. No	<u>Amount</u>	<u>Water</u>	Wastewater	<u>6759080</u>	<u>6759080</u>
6501030	650/750	(\$2,137)	(\$1,211)	(\$926)		
6755070	620	(7,500)	(7,500)	0		
6759080	720	1,500	0	1,500		\$1,500
6755090	620	(3,400)	(3,400)	0		
6759080	620/720	680	385	295	\$385	295
6755090	620	(4,517)	(4,517)	0		
6759080	620/720	903	512	391	512	391
6755090	620	(29,601)	(29,601)	0		
6759080	620	2,845	2,845	0	2,845	
6759081	620	(10,024)	(10,024)	0		
6759080	620	2,506	2,506	0	2,506	
7754006	720	(1.500)	<u>0</u>	(1,500)		
	٠	(\$50,245)	(\$50,005)	(\$240)	\$6,248	\$2,186

Rate Base and Dep. Expense Adjustment

Utility	NARUC			
Acct. No.	Acct. No	Amount	<u>Water</u>	Wastewater
2000	108	(\$267)	(\$151)	(\$116)
3917000	341/391	\$2,137	\$1,211	\$926
4032092	403	\$267	\$151	\$116

13-Month average calculation of rate base adjustment

Utility														13-Month
Acct. No.	Dec-04	Jan-05	Feb-05	Mar-05	<u>Apr-05</u>	May-05	<u>Jun-05</u>	Jul-05	Aug-05	Sep-05	Oct-05	Nov-05	Dec-05	Average
3917000	\$ 0	\$0	\$0	\$0	\$2,137	\$2,137	\$2,137	\$2,137	\$2,137	\$2,137	\$2,137	\$2,137	\$2,137	\$1,479
1082000	0	ō	0	Q	(30)	(59)	(89)	(119)	(148)	(178)	(208)	(237)	(267)	(103)
	\$0	\$0	\$0	\$ 0	\$2,107	\$2,078	\$2,048	\$2,018	\$1,989	\$1,959	\$1,929	\$1,900	\$1,870	\$1,377
									V	Vater	56.67%	\$1,211	(\$151)	\$780
									v	V/Water	43.33%	926	(116)	597
												\$2.137	(\$267)	\$1.377

Deferred Asset Adjustments

Utility	NARUC				
Acct. No.	Acct. No	<u>Posted</u>	<u>Amount</u>	Water	Wastewater
1862***	186	May-05	\$7,500	\$0	\$7,500
1865***	186		(1,500)	0	(1,500)
1862***	186	Apr-05	3,400	1,927	1,473
1865***	186		(680)	(385)	(295)
1862***	186	Apr-05	4,517	2,560	1,957
1865***	186		(903)	(512)	(391)
1862***	186	Jul-05	28,445	28,445	0
1865***	186		(2,845)	(2,845)	0
1862***	186	Nov-05	10,024	10,024	0
1865***	186		(2.506)	<u>(2,506)</u>	<u>.0</u>
Total Adjusti	nent to Defer	red Assets	\$45,452	\$36,708	\$8,744

13-Month average calculation of deferred asset balances

	\$0	\$3,775	\$5,337	\$12,687	\$20,279	\$19,953	\$19,627	\$19,588	\$19,848	\$19,522	\$19,196	\$21,431	\$45,453	\$17,438
1865***	<u>0</u>	<u>0</u>	Ō	<u>0</u>	Ō	<u>0</u>	<u>Q</u> .	<u>0</u>	0	<u>0</u>	<u>0</u>	(1,253)	(2,506)	(289)
1862***	0	3,775	5,337	5,337	5,337	5,337	5,337	5,625	6,210	6,210	6,210	10,025	10,025	5,751
1865***	0	0 -	0	0.	0 .	- C	0	0	0	0	0	0	(2,845)	(219)
1862***	. 0	0	0	0	0 :	0	0	0	0	0	0	0	28,445	2,188
1865***	0	0	0	0	(100)	(201)	(301)	(401)	(502)	(602)	(702)	(803)	(903)	(347)
1862***	, 0	. 0	. 0	0	4,517	4,517	4,517	4,517	4,517	4,517	4,517	4,517	4,517	3,127
1865***	0	0	0	.0	(76)	(151)	(227)	(302)	(378)	(453)	(529)	(604)	(680)	(262)
1862***	0	-0	0	0	3,400	3,400	3,400	3,400	3,400	3,400	3,400	3,400	3,400	2,354
1865***	O.	0 ·	0 -	(150)	(300)	(450)	(600)	(750)	(900)	(1,050)	(1,200)	(1,350)	(1,500)	(635)
1852***	\$0	\$0	\$0	\$7,500	\$7,500	\$7,500	\$7,500	\$7,500	\$7,500	\$7,500	\$7,500	\$7,500	\$7,500	\$5,769
Acct. No.	Ω=r=04	Jan-05	F=h-05	Mar-05	<u> Apr 05</u>	May-05	Jun-05	<u>Jul-05</u>	A1:2-05	<u>Gep-05</u>	Oct-05	Nov-05	Dec-05	Average
Utility														13-Month

SUBJECT: ADJUSTMENT TO ALLOCATED WSC EXPENSE

SUMMARY: The utility's allocated common operating expense from Water Service Corporation (WSC) is \$464,844 for the 12-month period ended December 31, 2005.

STATEMENT OF FACTS: WSC, the service corporation for the parent company Utilities, Inc., allocates a portion of its common operating expenses to each subsidiary utility throughout the United States. Sanlando Utilities Corporation received \$481,539 or approximately 6.30 percent of \$7,644,705 in total WSC common expenses for the 12-month period ended December 31, 2005. The allocation was calculated using a customer equivalent percentage that equates all customers throughout the United States in terms of equivalent residential connections.

The Commission's Division of Regulatory Compliance and Consumer Assistance, at the request of The Division of Economic Regulation, performed an affiliate transaction audit of Utilities, Inc. and its subsidiary WSC for the 12-month period ended December 31, 2005, in Docket No. 060253-WS. The scope of the audit included a review of the WSC common expenses that are allocated to all of its subsidiary operations in 2005. The audit report, issued July 15, 2006, included specific adjustments that reduced Sanlando Utilities Corporation's allocated common expenses by \$16,695 to \$464,844.

The audit staff has incorporated the findings of the above-mentioned audit report to determine Sanlando Utilities Corporation's allocated average WSC common expenses is \$464,844 for this proceeding. See audit staffs calculations on the following page.

EFFECT ON THE GENERAL LEDGER:

G/L Acct.	Description	Debit	Credit
2151000	Retained Earnings	\$13,597	
4032098	Dep. Exp Computer		\$643
4191010	Interest Income	\$9	
4272090	Interest Expense	\$3,089	
6329002	Audit Fees		\$5,603
6369009	Amtz. Exp Computer		\$117
6599090	Insurance Exp Other		\$7,770
6759005	Postage Fees		\$2,562

EFFECT ON THE FILINGS: The utility's water and wastewater O&M expense balances are overstated by \$9,740 and \$6,955, respectively, for the 12-month period ended December 31, 2005.

Sanlando		Per Compa	ıny	Adjustr	nent	Per Audit			
Allocatio	n Schedules	WSC Expense	Sanlando 1	WSC Expense	Sanlando	WSC Expense	Sanlando		
SE51	Allocated Computer	\$545,445	\$33,255	(\$12,634)	(\$760)	\$532,811	\$32,495		
SE52	Allocated Insurance	2,114,495	113,914	(156,711)	(7,770)	1,957,784	106,144		
SE60	Allocated General	4,984,765	<u>334,370</u>	<u>(74,972)</u>	(5,067)	4,909,793	329,303		
Per G/I		\$7,644,705	\$481,539	(\$244,317)	(\$13,597)	\$7,400,388	\$467,942		
Remo	ve interest income and	expense not include	ed in the filing	3	<u>(\$3,098)</u>	·	<u>(\$3,098)</u>		
Per MF	rr.				(\$16,695)		\$464,844		
SE51									
Aect No.	AND THE PROPERTY OF	a	Per Utility		Adjustment		Per Audit		
	Dep Computer		\$7,548		(\$117)		\$7,431		
6369009	Amtz Computer		<u>1,556</u>		<u>(643)</u>		<u>913</u>		
SEE2			\$9,104		(\$760)		\$8,344		
SE52 Acct No.			Per Utility		Adjustment		Per Audit		
6599090	Insurance - Other		\$113,914		(\$7,770)		\$106,144		
SE60									
Acct No.			Per Utility		Adjustment		Per Audit		
4191010	Interest Income		(\$9)		\$9		\$ 0		
4272090	Interest Expense		(3,089)		3,089		0		
6329002	Audit Fees		16,461		(5,603)		10,858		
6759005	Postage Fees		<u>4,862</u>		(2,562)		2,300		
			\$18,225		(\$5,067)		\$13,158		
					• .	MFR B-12	MFR B-12		
		MFR				56.67%	43.33%		
Acct No.		Acct. No.			Adjustment	Water	W/Water		
4032098	Dep Computer	403 *			(\$643)	(\$643)	\$0		
4191010	Interest Income	426 **			0	0.	. 0		
4272090	Interest Expense	419/427 **			0	0	0		
6329002	Audit Fees	632/732	•		(5,603)	(3,175)	(2,428)		
6369090	Amtz Computer	636/736			(117)	(66)	(51)		
6599090	Insurance - Other	659/759			(7,770)	(4,403)	(3,367)		
6759005	Postage Fees	675/775			(2,562)	(1,452)	(1,110)		
					(\$16,052)	(\$9,097)	(\$6,955)		
	Total WSC allocated	expense adjustment			(\$16,695)	(\$9,740)	(\$6,955)		

^{*} This account was only charged to water operations per the reconciliation schedule provided with the MFRs.

^{**} Per utility these two allocations from WSC are not carried forward into the MFR filing so no adjustment is needed.

SUBJECT: ADJUSTMENT TO DEPRECIATION EXPENSE

SUMMARY: The utility's water and wastewater accumulated depreciation and depreciation expense balances are understated by \$24,210 and \$33,952, each, for the 12-month period ended December 31, 2005.

STATEMENT OF FACT: The utility records depreciation accruals monthly but the recorded amount is based on the beginning balance of plant and is not trued up at year end.

Rule 25-30.140, F.A.C., requires the use of specific rates for each utility plant in service (UPIS) account. The utility provided a depreciation schedule that computed depreciation accruals based on its 2005 beginning UPIS sub-account balances for the year and it multiplied each account balance times the corresponding monthly depreciation rate. The utility reported some account activity to its UPIS account balances in July 2005 in its depreciation schedules, however the activity could not be reconciled to the general ledger.

Additionally the utility's depreciation schedule addressed the balances included for the transportation equipment account. Depreciation accruals, when recomputed by the audit staff, on the account balances using the required rule rates was substantially lower than the depreciation reported in the utility's filing.

The schedules on the following pages detail the differences between the audit staff's calculated depreciation accruals and the amounts reported in the utility's filing. Allocated depreciation balances from subsidiary operations are not included in these schedules because they were audited separately in the affiliate transaction investigation in Docket No. 060253-WS. Only the 2005 test year was affected because that is the year that the utility booked the adjustments for its last rate case in Docket No. 98067-WS. The utility's adjustments only affected the 2005 beginning balance and not the July 2005 activity. The audit staff's schedule computes depreciation accruals on transportation equipment using the required rule rate which is substantially higher than the rate used by the utility in its filing and is the major reason for the difference.

EFFECT ON GENERAL LEDGER: The utility's water and wastewater accumulated depreciation and net depreciation expense balances should be increased by \$24,210 and \$33,953, each, respectively, for the 12-month period ended December 31, 2005. See the audit staff's calculations that follow for details.

EFFECT ON FILING: The utility's 13-month average water and wastewater rate base should be reduced by \$12,105 (\$24,210/2) and \$16,977, (\$33,953/2) respectively, as of December 31, 2005. The net depreciation expense adjustments are the same amounts discussed above.

The 13-month average rate base calculation is approximately one-half of the total accumulated depreciation adjustment because we used the half-year convention method to calculate the depreciation expense adjustment.

Water Accumulated Depreciation and Depreciation Expense Adjustments

Utility			Accumulated D	eprecitaion	Deprecia	ition Expense	
Acct	Nos.	Acct. Description		Debit	Credit	Deb	it Credit
1083021	4032021	Structures Pumping	·		\$11	\$1	1
1083011	4032011	Structures Source		\$2	,		\$2
1083031	4032031	Str. Water Treatement			2		2
1083014	4032014	Wells			183	18	33
1083025	4032025	Electric Pumping Eq.			1,522	1,52	22
1083032	4032032	Water Treat. Equip.			11	. 1	1
1083042	4032042	Distribution Resevoirs			211	21	11
1083043	4032043	Mains			957	95	57
1083045	4032045	Service Lines			204	. 20	04
1083046	4032046	Meters			324	32	24
1083047	4032047	Meter Installation			336	33	36
1083048	4032048	Hydrants			95		95
1083090	4032090	Office Structures			4		4
1083091	4032091	Office Furniture			15		15
1083095	4032095	Lab Eq.			35	3	35
1083094	4032094	Tools			322	32	22
108	403	Other Plant			2,236	2,23	36
1082000	4032092	Transportation Eq.			17,742	17,74	42
Total Wate	r Acc/Dep.	& Dep. Exp. Adjustment		<u>\$2</u>	<u>\$24,212</u>	\$24,2	12 \$2
Total Ad	ljustment			Inc. Acc/Dep	\$24,210	Inc. Dep. Ex	p. <u>\$24,210</u>

See the schedule that follows for the specific audit staff calculations.

Wastewater Accumulated Depreciation and Depreciation Expense Adjustments

Uti	lity	Accumulated Depre	ecitaion	Depreciation Expense			
Acct.	Nos. Acct. Description	Debit	Credit	Debit	Credit		
1084011	4033011 Lift Stations		\$14,897	\$14,897			
1084003	4033003 Buildings		126,905	126,905			
1084006	4033006 Services	\$875		•	\$875		
1085006	4037006 Reuse Services		28	28			
1084007	4033007 Force Mains		3	3			
1084008	4033008 Gravity Mains		202	202			
1084010	4033010 Manholes		17	17			
1085008	4037008 Reuse Trans. & Dist. Eq.	262			262		
1084005	4033005 Sewer Treatment Plant	124,760			124,760		
1084009	4033009 Outfall Lines		19	19			
1084091	4033091 Office Furniture	3			3		
1082000	4032092 Transportation		17,742	17,742			
1084094	4033094 Tools		37	37			
1084097	4033097 Communication Eq.		4	4			
Total Waste	water Acc/Dep. & Dep. Exp. Adjustment	<u>\$125,901</u>	<u>\$159,854</u>	<u>\$159.854</u>	<u>\$125,901</u>		
Total Ad	justment	Inc. Acc/Dep	\$33.953	Inc. Dep. Exp.	<u>\$33,953</u>		

See the schedule that follows for the specific audit staff calculations.

Utility Plant in Service and	Depreciation Expense Adjustn	ents
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Utility	NARUC		Rule	Balance	Adjustment	Net	2005	Balance	Dep.	Per		Dep. Exp.	Adjusting	Acc/Dep	Adjusting
Acct. No.	Acct. No.		Dep. Rate	12/31/04	for 2001	Beg. Bal.	Additions	12/31/05	Ехр.	Filing	Difference	Acct. No.	Entry	Acct. No.	Entry
3011001	301	Organization	2.50%	\$480	\$0	\$480	\$0	\$480	Not in Filing	Not in Filing	\$0	1083001	\$ó	4032001	\$0
3021002	302	Franchise	2.50%	217,765	0	217,765	14,754	232,519	Not in Filing	Not in Filing	0		0	4033020	
3033020	303	Land	-na-	46,000	0	46,000	0	46,000	-na-	-na-	-na-	-na-	-na-	-na-	-na-
3034030	303	Land	-na-	75,578	0	75,578	0	75,578	-na-	-na-	-na-	-na-	-na-	-па-	-na-
3036010	303	Land	-03-	2,194	0	2,194	0	2,194	-na-	-na-	-na-	-na-	-na-	-na-	-na-
3042011	304	Structure Source	3.13%	34,728	0	34,728	0	34,728	1,085	1,087	(2)	1083011	2	4032011	(2)
3043021	304	Structure Pump	3.13%	72,167	. 0	72,167	1,952	74,118	2,286	2,275	11	1083021	(11)	4032021	11
3044031	304	Str. Water Treat.	3.13%	249,473	0	249,473	2,259	251,732	7,831	7,829	2	1083031	(2)	4032031	2
3072014	307	Wells	3.33%	681,329	0	681,329	9,607	690,937	22,871	22,688	183	1083014	(183)	4032014	183
3113025	311	Electric Pump	5.00%	1,258,640	0	1,258,640	179,949	1,438,589	67,431	65,909	1,522	1083025	(1,522)	4032025	1,522
3204032	320	Wt Equip	4.55%	378,055	0	378,035	3,011	381,065	17,253	17,241	11	1083032	(11)	4032032	11
3305042	330	Dist Res	2.70%	1,035,916	0	1,035,916	23,867	1,059,782	28,320	28,109	211	1083042	(211)	4032042	211
3315043	331	Mains	2.33%	7,068,405	14,631	7,083,636	265,065	7,348,101	167,804	166,846	957	1083043	(957)	4032043	957
3335045	333	Service Lines	2.50%	1,183,814	0	1,183,814	33,792	1,217,606	30,018	29,814	204	1083045	(204)	4032045	204
3345046	334	Meters	5.00%	1,126,813	0	1,126,813	28,836	1,155,649	57,062	56,738	324	1083046	(324)	4032046	324
3345047	334	Meter Instal	5.00%	64,108	.0	64,108	13,447	77,555	3,542	3,205	336	1083047	(336)	4032047	336
3355048	335	Hydrants	2.22%	664,525	0	664,525	11,697	676,222	14,897	14,802	95	1083048	(95)	4032048	95
3406091	340	Office Furn	6.67%	68,459	0	68,459	706	69,165	4,587	4,572	15	1083091	(15)	4032091	15
3917000	341	Transprot	16.67%	331,877	0	331,877	(606)	331,271	55,262	37,520	17,742	1082000	(17,742)	4032092	17,742
3466094	343	Tools	6.25%	260,316	0	260,316	17.490	277,806	16,816	16,494	322	1083094	(322)	4032094	322
3446095	344	Lab Eq	6.67%	15,220	0	15,220	1,905	17,125	1,078	1,043	35	1083095	(35)	4032095	35
3466097	346	Communication	10.00%	71,341	0	71,341	0	71,341	7,134	7,134	. 0	1083097	(0)	4032097	0
3406020	348	System Costs	12.50%	55,500	0	55,500	0	55,500	Fully Dep.	0	0	1081020	0	4032098	0
3406050	348	Computer Alloct.	-na-	34,510	. 0	34,510	(1,419)	33,091	Allocated	0	0	1081050	0	4032098	. 0
3406090	348	Office Struct	2.50%	751	0	751	0	751	19	15	. 4	1083090	(4)	4032090	4
3406110	348	Comuter Sys. Costs	12.50%	20,295	0	20,295	. 0.	20,295	In O&M	0	. 0	3406150	0	In O&M	. 0
3486000	348	Other Plant	10.00%	22,363	0	22,363	. 0	22,363	2,236	0	2,236	1083***	(2,236)	403****	2,236
3486050	348	Other Allocated	-na-	299,842	<u>0</u>	299,842	(35,837)	264,005	Allocated	0	<u>0</u>	108305	Õ	4032098	ō
				\$15,340,462	\$14,631	\$15,355,093	\$570,475	\$15,925,568	\$507,532	\$483,322	\$24,210		(\$24,210)		\$24,210

33,221 Allocated Depreciation Expense

Total Balances per Filing

15,922,686

516,540

Utility Plant in Service and Depreciation Expense Adjustments

Utility	NARUC		Rule	Balance	Adjustment	Net	2005	Balance	Dep.	Per		Dep. Exp.	Adjusting	Acc/Dep	Adjusting
Acct. No.	Acct. No.		Dep. Rate	12/31/04	for 2001	Beg. Bal.	Additions	12/3'1/05	Exp.	Filing	Difference	Acct. No.	Entry	Acct, No.	Entry
3511001	351	Organization	2.50%	\$429	\$0	\$429	\$6	\$429	Not in Filing	Not in Filing	\$0	1084001	\$0	4033001	\$0
3521020	352	Franchise	2.50%	87,919	. 0	87,919	0	87,919	Not in Filing	Not in Filing	. 0	1084020	0	4033020	0
3537002	353	Land	-na-	202,552	0	202,552	0	202,552	-na-	-na-	0	-na-	-na-	-na-	-na-
3542011	354	Lift Station	4.00%	2,035,889	0	2,035,889	91,522	2,127,411	83,266	68,369	14,897	1084011	(14,897)	4033011	14,897
3547003	354	Building	3.13%	266,024	4,061,555	4,327,579	0	4,327,579	135,237	8,332	126,905	1084003	(126,905)	4033003	126,905
3602006	360	Services	2.63%	127,482	0	127,482	2,083	129,565	3,382	4,257	(875)	1084006	875	4033006	(875)
3612007	360	Force	3.33%	83,119	0	83,119	521	83,640	2,779	2,777	3	1084007	(3)	4033007	3
3612008	361	Gravity	2.22%	6,461,072	470,202	6,931,274	7,194	6,938,468	154,108	153,907	202	1084008	(202)	4033008	202
3612010	361	Manholes	3,33%	88,109	0	88,109	1,155	89,265	2,956	2,940	17	1084010	(17)	4033010	17
3662006	366	Reuse Services	2.63%	756	0	756	12,444	13,200	184	156	28	1085006	(28)	4037006	28
3675046	367	Reuse Meter	5.00%	2,685	0	2,685	4,481	7,166	246	246	(0)	1085046	0	4037046	(0)
3752008	375	Reuse T & D	2.33%	6,687,974	0	6,687,974	674	6,688,648	155,570	155,832	(262)	1085008	262	4037008	(262)
3804005	380	Stp	5.55%	4,802,974	(4,061,555)	741,420	156,236	897,656	45,484	170,245	(124,760)	1084005	124,760	4033005	(124,760)
3824009	382	Outfall Lines	3.33%	644,005	0	644,005	0	644,005	21,465	21,445	19	1084009	(19)	4033009	19
3907091	390	Furniture	6.67%	57,823	0	57,823	0	57,823	3,854	3,858	(3)	1084091	3	4033091	(3)
3917000	391	Transp.	16.67%	331,877	0	331,877	(606)	331,271	55,262	37,520	17,742	1082000	(17,742)	4032092	17,742
3937094	393	Tools	6.25%	79,577	0	79,577	1,921	81,498	5,034	4,996	37	1084094	(37)	4033094	37
3967097	398	Communication	10.00%	97,021	õ	97,021	<u>0</u>	97,021	9,702	9,698	4	1084097	<u>(4)</u>	4033097	4
				\$22,057,289	\$470,202	\$22,527,491	\$277,624	\$22,805,115	\$678,530	\$644,578	\$33,953		(\$33,953)		\$33,953

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\$22,805,115

\$644,577

SUBJECT: ADJUSTMENT TO CIAC AMORTIZATION EXPENSE

SUMMARY: The utility's water and wastewater accumulated amortization of CIAC and CIAC amortization expense balances are understated by \$1,773 and \$1,659, each, respectively, for the 12-month period ended December 31, 2005.

STATEMENT OF FACTS: The utility records CIAC amortization expense accruals monthly but the recorded amount is based on the beginning balance of plant and is not trued up at year end.

Rule 25-30.140, F.A.C., requires the use of specific rates for each utility plant in service (UPIS) account and the corresponding CIAC accounts. The utility provided a depreciation schedule that computed depreciation accruals based on its 2005 beginning UPIS sub-account balances for the year and it multiplied each account balance times the corresponding monthly depreciation rate. The utility reported some account activity to its UPIS account balances in July, 2005, however the activity could not be reconciled to the general ledger. The utility's depreciation schedule did not adequately compute depreciation accruals on the July 2005 activity.

The schedules on the following pages details the differences between the audit staff's calculated CIAC amortization accruals and the amounts reported in the utility's filing. The audit staff's composite amortization rate for CIAC accruals was computed using the adjusted depreciation expense balances in the Audit Finding 14 of this report.

EFFECT ON GENERAL LEDGER: The utility's water and wastewater accumulated amortization of CIAC and net CIAC amortization expense balances should be increased by \$1,773 and \$1,659, each, respectively, for the 12-month period ended December 31, 2005. See the audit staff's calculations that follow for details.

EFFECT ON THE FILING: The utility's 13-month average water and wastewater rate base should be reduced by \$887 (\$1,773/2) and \$830, (\$1,659/2) respectively, as of December 31, 2005. The net depreciation expense adjustments are the same amounts discussed above.

The 13-month average rate base calculation is approximately one-half of the total accumulated amortization of CIAC adjustment because we used the half-year convention method to calculate the CIAC amortization expense adjustment.

Water Accumulated Amortization and Amortization Expense Adjustments

Utili	ity		Accumulted Amortz	. of CIAC	CIAC Amortz.	Exp.
Acct. 1	Nos.	Acct. Description	Debit	Credit	Debit	Credit
2722011	4071011	CIAC Structures		\$182	\$182	
2722000	4071000	CIAC Undistributed	\$1,523			\$1,523
2722010	4071010	CIAC Water Cash	479			479
2722031	4071031	CIAC Structures	4			4
2722014	4071014	CIAC Wells & Springs	32			32
2722025	4071025	CIAC El. Pumping	38			38
2722032	4071032	CIAC Treatment Eq.		5	5	
2722043	4071043	CIAC Trans. & Dist.		116	116	
2722046	4071045	CIAC Services		37	. 37	
2722046	4071046	CIAC Meters	36		Ÿ	36
2722047	4071047	CIAC Meter Instal.	1			1
Total Water	Adjustme	nt	\$2,113	\$340	\$340	\$2,113
Total Adjı	ustment		Inc. Acc/Amortz.	(\$1,773)	Inc. Amortz Exp.	(\$1,773)

See the schedule that follows for the specific audit staff calculations.

Wastewater Accumulated Amortization and Amortization Expense Adjustments

Utility		Accumulated Amoi	rtz. Of CIAC	CIAC Amortz, Exp.		
Acct.	Nos.	Acct. Description	Debit	Credit	Debit	Credit
2723000	4073000	CIAC Undistributed		\$7,261	\$7,261	
2723003	4073003	CIAC Building and Struc.	\$95,455			\$95,455
2723005	4073005	CIAC WW Treatment Plant		96,767	96,767	
2723006	4073006	CIAC Services		581	581	
2723007	4073007	CIAC Force Mains	2			2
2723008	4073008	CIAC Gravity	124			124
2723009	4073009	CIAC Outfall Lines	16		100	16
2723011	4073011	CIAC Lift Station	10,361			10,361
2723010	4073010	CIAC Cash	307			307
2723098	4073098	CIAC Manholes	3		7	3
Total Waste	ewater Adjı	ustment	<u>\$106,268</u>	<u>\$104.609</u>	<u>\$104.609</u>	<u>\$106,268</u>
Total Ad	justment		Inc. Acc/Dep	(\$1,659)	Inc. Dep. Exp.	<u>(\$1,659)</u>

See the schedule that follows for the specific audit staff calculations.

Water - Accumulated Amortization of CIAC and CIAC Amortization Expense Adjustment

Utility	NARUC		Amortz.	G/L Balance	2004	Adj. G/L Bal.	2,005.00	G/L Balance	Calculated	Amortz, Exp		Acc/Amortz.		Amortz. Exp	
Acct. No.	Acct. No.	Acct. Description	Rate	12/31/2004	Adjust.	12/31/2004	Additions	12/31/2005	Amortz, Exp	per Filing	Difference	Acct. No	Adjustment	Acct. No.	Adjustment
2711011	271	CIAC - Structures	2.50%	(28,725)	0	(28,725)	0	(28,725)	(717)	(899)	182	2722011	(182)	4071011	182
2711000	271	CIAC - Water Ciac Undist.	2.98%	(43,668)	(340,475)	(384,143)	0	(384,143)	(11,444)	(9,921)	(1,523)	2722000	1,523	4071000	(1,523)
2711010	271	CIAC - Water Ciac Tax	2.98%	(54,679)	0	(54,679)	(34,599)	(89,278)	(2,144)	(1,665)	(479)	2722010	479	4071010	(479)
2711021	271	CIAC - Pumping	3.13%	(11,159)	0	(11,159)	0	(11,159)	(350)	(349)	(0)	2722921	0	4071021	(0)
2711031	271	CIAC - Structures Tp	3.13%	(203,616)	0	(203,616)	0	(203,616)	(6,377)	(6,373)	(4)	2722 331	4	4071031	(4)
2711014	271	CIAC - Wells And Springs	3.34%	(531,892)	0	(531,892)	0	(531,892)	(17,744)	(17,712)	(32)	2722014	32	4071014	(32)
2711025	271	CIAC - Electric Pumping	5.00%	(960,655)	0	(960,655)	0	(960,655)	(48,071)	(48,033)	(38)	2722025	38	4071025	(38)
2711032	271	CIAC - Treatment Eq.	4.55%	(256,069)	0	(256,069)	0	(256,069)	(11,646)	(11,651)	5	2722)32	(5)	4071032	. 5
2711042	271	CIAC - Distr. Res.	2.70%	(830,775)	0	(830,775)	0	(830,775)	(22,431)	(22,431)	(0)	2722042	0	4071042	(0)
2711043	271	CIAC - T&D Mains	2.33%	(5,784,505)	0	(5,784,505)	0	(5,784,505)	(134,663)	(134,779)	116	2722043	(116)	4071043	116
2711045	271	CIAC - Services	2.50%	(923,145)	0	(923,145)	0	(923,145)	(23,042)	(23,079)	37	2722046	(37)	4071045	37
2711046	271	CIAC - Meters	5.00%	(891,082)	0	(891,082)	0	(891,082)	(44,590)	(44,554)	(36)	2722046	36	4071046	(36)
2711047	271	CIAC - Meter Installations	5.00%	(31,933)	0	(31,933)	0	(31,933)	(1,598)	(1,597)	(1)	2722047	1	4071047	(1)
2711048	271	CIAC - Hydrants	2.22%	(551,513)	<u>o</u>	(551,513)	<u>o</u>	(551,513)	(12,244)	(12,244)	<u>o</u>	2722048	<u>0</u>	4071048	<u>o</u>
		•		(11,103,415)	(340,475)	(11,443,890)		(11,478,488)	(337,060)	(335,286)	(i,773)		1,773		1,773

Wastewater - Accumulated Amortization of CIAC and CIAC Amortization Expense Adjustment

Utility	NARUC		Amortz.	G/L Balance	2004	Adj. G/L Bal.	2,005.00	G/L Balance	Calculated	Amortz. Exp		Acc/Amortz.		Amortz. Exp	
Acct. No.	Acct. No.	Acct. Description	Rate	12/31/2004	Adjust.	12/31/2004	Additions	12/31/2005	Amortz. Exp	per Filing	Difference	Acct. No	Adjustment	Acct. No.	<u>Adjustment</u>
2721000	271	CIAC - Undistributed	1.40%	(21,928)	(465,423)	(487,352)	0	(487,352)	(6,830)	(14,091)	7,261	2723000	(7,261)	4073000	7,261
2721003	271	CIAC - Building	3.13%	(213,854)	(3,090,697)	(3,304,551)	0	(3,304,551)	(103,267)	(7,812)	(95,455)	2723003	95,455	4073003	(95,455)
2721005	271	CIAC - Sewer Treat. Plt.	5.55%	(3,680,129)	3,090,697	(589,433)	G	(589,433)	(32,714)	(129,480)	96,767	2723005	(96,767)	4073005	96,767
2721006	271	CIAC - Services	2.63%	(83,237)	0	(83,237)	0	(83,237)	(2,190)	(2,772)	581	2723006	(581)	4073006	581
2721007	271	CIAC - Force Mains	3,33%	(64,573)	0	(64,573)	0	(64,573)	(2,152)	(2,150)	(2)	2723007	2	4073007	(2)
2721008	271	CIAC - Gravity	2.22%	(5,592,608)	0	(5,592,608)	.0	(5,592,608)	(124,280)	(124,156)	(124)	2723008	124	4073008	(124)
2721009	271	CIAC - Outfall Lines	3.33%	(517,709)	0	(517,709)	0	(517,709)	(17,255)	(17,240)	(16)	2723009	16	4073009	(16)
2721011	271	CIAC - Lift Station	4.00%	(1,546,415)	. 0	(1,546,415)	0	(1,546,415)	(61,857)	(51,496)	(10,361)	2723611	10,361	4073011	(10,361)
2721010	271	CIAC - Sewer Tax	1.40%	(47,991)	0	(47,991)	(6,835)	(54,826)	(720)	(414)	(307)	2723610	307	4073010	(307)
2721098	271	CIAC - Manholes	3.33%	(101,798)	<u>0</u>	(101,798)	0	(101,798)	(3,393)	(3,390)	(3)	2723098	<u>3</u>	4073098	(3)
				(11,831,891)	(463,419)	(12,297,315)	(4,830)	(12,303,785)	(354,659)	(353,000)	(1,659)		1,659		(1,659)

SUBJECT: ADJUSTMENT TO TAXES OTHER THAN INCOME

SUMMARY: The utility's water and wastewater Taxes Other Than Income (TOTI) balances are understated by \$3,289 and \$4,112, respectively, for the 12-month period ended December 31, 2005.

STATEMENT OF FACTS: The utility's filing reflects balances of \$227,119 and \$305,428 for water and wastewater TOTI, respectively, for the 12-month period ended December 31, 2005. The utility filing also included test year adjustments to these balances, however, the adjustments were for rate case purposes and not related to historical operations.

System	RAFs	Payroll Taxes	Real Estate Taxes	Total
Water	\$89,605	\$48,118	\$89,396	\$227,119
Wastewater	<u>143,497</u>	<u>39,036</u>	<u>122,895</u>	<u>\$305,428</u>
	\$233,102	\$87,154	\$212,291	\$532,547

The utility's water and wastewater RAF balances are understated by \$2,610 and \$4,790, respectively, based on the following audit staff determinations.

- 1. The utility allocated its total RAF balance to water and wastewater operations based on its corresponding revenues for the period. They should have recorded the specific RAF amounts calculated to each specific system.
- 2. The utility's combined RAF balance above of \$233,102 includes RAFs calculated for the period July 2004 through December 2004 and does not include the July 2005 through December 2005 combined RAF balance of \$119,395. The utility should have included the proper periods for the filing.

The utility's water and wastewater real estate tax balances are overstated by \$678 and understated by \$678, respectively, because the utility allocated all property taxes based on gross utility plant percentages. The utility should have first recorded the real estate taxes to the specific water or wastewater system being served and then allocate the remaining common property tax balance between water and wastewater systems based on the gross utility plant percentages.

The audit staff calculations are on the following page.

EFFECT ON GENERAL LEDGER: The utility's 2005 RAF should be increased by a net \$7,401 to properly record the actual combined water and wastewater RAF for the period. There is no effect on property taxes because it is a reallocation within the same utility system.

EFFECT ON THE FILING: The utility's water and wastewater Taxes Other Then Income (TOTI) balances should be increased by \$3,289 and \$4,112, respectively, for the 12-month period ended December 31, 2005.

Adjustment to RAF	Water	W/Water	Total	<u> </u>
Per Audit	\$46,941	\$73,962	\$120,903	Add Jan-Jun 2005 per RAF filing
Per Utility	(33,970)	(54,180)	(88,151) *	Remove Jan-Jun 2005 per RAF filing
Per Audit	45,420	73,975	119,395	Add Jul-Dec 2005 RAF filing
Per Utility	(55,780)	(88,966)	(144,746) *	Remove Jul-Dec 2004 RAF filing
Audit Adjustment	\$2,610	\$4,790	\$7,401	Remove 2004 RAF and add 2005 RAF
_	_			
Adjustment to Prope				
Per Audit	\$10,041	\$14,365	\$24,406	Allocated based on gross UPIS in MFRs
Per Audit	1,939	2,774	4,713	Allocated based on gross UPIS in MFRs
Per Audit			1,104	Real Estate Tax Invoice Ref# U92091
Per Audit	72,242	103,353	175,595	Allocated based on gross UPIS in MFRs
Per Audit	0	1,724	1,724	Real Estate Tax Invoice Ref# U92094
Per Audit	3,653	0	3,653	Real Estate Tax Invoice Ref# U92093
Per Audit	878	0	878	Real Estate Tax Invoice Ref# U92095
Per Audit	217	. 0	217	Real Estate Tax Invoice Ref# U92092
Per Company	<u>(89,396)</u>	<u>(122,895)</u>	(212,291) *	Remove utility allocated property tax balanc
Audit Adjustment	\$678	(\$678)	\$0	
Counting of Audit Steel	00 A di			
Combined Audit Stat	ii Adjustment			
	\$3,289	\$4,112	\$7,401	
UPIS MFR A-5&6	\$15,922,686	\$22,805,117	\$38,727,803	
Less Land	(123,772)	(202,552)	(326,324)	
Gross UPIS	\$15,798,914	\$22,602,565	\$38,401,479	
Percentage	41.14%	58.86%	100.00%	

^{*} Allocated based on gross utility plant

SUBJECT: INFORMATION ON THE SALE OF UTILITY LAND

SUMMARY: Rate base may be overstated because utility land was sold and not recorded on the books of Sanlando Utilities Inc.

STATEMENT OF FACT: A warranty deed for the sale of utility property between Sanlando Utilities Corp. and Congregation Beth Am was discovered by the audit staff in a search of Seminole County property records. The deed, executed on May 22, 2000, was recorded in Book 3856, Page 1555 and 1556, of the Seminole County Clerk of the Court Official records.

We could not determine if the original cost was included in land in the previous rate case. The sale was recorded in the equipment account (4141040) of Utilities Inc.'s general ledger.

The only document provided by the utility was a copy of the check for the net proceeds of \$56,170. The sale price for the property was calculated to be \$62,500 (\$437.50/.70*100) based on the documentary stamps of \$437.50 paid to Seminole County which was recorded on the face of the warranty deed.

EFFECT ON THE LEDGER: The general ledger needs to be reduced for the original cost of the land once determined. Additionally, any gain on the sale of utility property should be recorded per NARUC and Commission rules.

EFFECT ON THE FILING: Rate Base may be overstated. The exact amount of this overstatement could not be determined because there is no record of the land's original cost.

SUBJECT: INFORMATION ON CONTRIBUTIONS IN AID OF CONSTRUCTION

SUMMARY: The utility allocated its Contributions in Aid of Construction (CIAC) in 2003 in order to comply with Rule 25-30.140, F.A.C. which required CIAC for contributed property which can be specifically associated with a corresponding utility plant in service (UPIS) account to be amortized using the same depreciation rates as the UPIS account.

STATEMENT OF FACTS: In 2003, the utility made an adjusting journal entry to re-distribute its combined CIAC account balances for its water and wastewater systems into several specific accounts based on the percentage of water and wastewater UPIS account balances excluding organization, franchise, transportation and office equipment account balances. The utility's calculations are displayed on the following two pages.

The utility first determined a balance for undistributed CIAC which represented cash collections. The amount was determined by estimating the total tap fees collected for the utility system. The remaining CIAC balance was then redistributed to specific CIAC sub-accounts based on the allocation methodology described above.

However, the audit staff notes that there are two problems with the utility's calculation.

- 1. The utility did not book Commission adjustments from the last rate case until 2005 and therefore the plant balances used by the utility to reallocate its CIAC balance did not reflect the Commission balances.
- 2. The utility allocated the CIAC to all of its UPIS accounts excluding organization, franchise and transportation equipment.

Usually when the utility receives contributed plant from a developer, it consists of service lines, lift stations, and customer service extensions. The utility's allocation method redistributed a portion of its CIAC balance to accounts containing buildings and structures, wells, pumping equipment, treatment plant and sewer lagoons. These accounts are not normally associated with contributed property for wastewater utility systems.

The audit staff defers this issue to the analyst in Tallahassee for final disposition.

EFFECT ON THE LEDGER: If the utility's CIAC allocation is recalculated by the analyst, the accumulated amortization of CIAC and CIAC amortization expense balances will all need to be adjusted accordingly.

EFFECT ON THE FILING: The total balance for CIAC reflected in the utility's filing will not change. However, the accumulated amortization of CIAC would need to be adjusted along with the 13-month average balance for the test year. Additionally the recalculated amortization of CIAC expense balance will affect the net depreciation expense presented in the utility's filing.

Sanlando-Water
Recalculation of CIAC and Amortization of CIAC

Retained Earnings Adjustment

Recalculatio	ii oi CiAC aii	id Amortization of CIAC	t IDYO	LIDIO	07.4.0	~					
Acc	t. Nos		UPIS	UPIS	CIAC	CIAC	CIAC	CIAC	CIAC	CIAC	CIAC
UPIS	CIAC	Acct. Description	Balance	Balance	Allocation	Additions	Balance	Amtz.	Amtz.	Amtz.	Amtz
0113	CIAC	Acct. Description	@12/31/02	Percentage	@12/31/02	Jan-Jun '03	@12/31/02	Rate	Jan-Jun '03	Jul-Dec '03	Total
3042011	2711011	Structures & Imp. (Source of Supply)	\$34,728	0.26%	\$28,725	0	\$28,725	3.13%	\$449	\$44 9	\$898
3043021	2711021	Structures & Imp. (Pumping Plt.)	13,491	0.10%	11,159	0	11,159	3.13%	174	174	349
3044031	2711031	Structures & Imp. (Treatment Plt.)	246,168	1.87%	203,616	0	203,616	3.13%	3,181	3,181	6,363
3052012	2711012	Collection Reservoirs	0	0.00%	0	0	0	2.00%	0	0	0
3072014	2711014	Wells & Springs	643,049	4.88%	531,892	0	531,892	3.33%	8,865	8,865	17,730
3113025	2711025	Pumping Equipment	1,161,418	8.82%	960,655	0	960,655	5.00%	24,016	24,016	48,033
3204032	2711032	Treatment Equipment	309,584	2.35%	256,069	0	256,069	4.55%	5,820	5,820	11,640
3305042	2711042	Distribution Reservoirs & Standpipes	1,004,395	7.62%	830,775	0	830,775	2.70%	11,227	11,227	22,453
3315043	2711043	Transmission & Distribution Mains	6,892,549	52.32%	5,701,102	0	5,701,102	2.33%	66,292	66,292	132,584
3335045	2711045	Service Lines	1,101,489	8.36%	911,085	0	911,085	2.50%	11,389	11,389	22,777
3345046	2711046	Meters	1,077,007	8.18%	890,835	246	891,082	5.00%	22,271	22,277	44,548
3345047	2711047	Meter Installations	33,595	0.29%	31,924	9	31,933	5.00%	798	798	1,596
3355048	2711048	Hydrants	651,297	4.94%	<u>538,714</u>	<u>149</u>	<u>538,863</u>	2.22%	5,986	5,987	<u>11,973</u>
			\$13,173,769	100.00%	\$10,896,550	404	\$10,896,954				\$320,943
271	CIAC Balar	nce per T/B @12/31/02	\$10,991,536								
	Less Tap Fe	ee portion of CIAC	(51,090)								
	Less Tap Fo	ee Refunds	3,217								
	Less known	CIAC Sub-Acct. Balance	(47,113)								
	Unidentifie	d CIAC balance	\$10,896,550								
271	CIAC Addi	itions (Jan-Jun '03)	\$3,015								
407.6	Amtz. Of C	CIAC Expense @12/31/03	•	\$333,801						-	
		ees Amtz of CIAC (Jan-Jun '03)		(728)				1 1	5 J		
	-	ees Amtz of CIAC (Jul-Dec '03)		(771)							
	-	Amtz. Of CIAC Sub-Acct. Balance	•	(1,102)							
	Unidentifie	d Amtz. Of CIAC balance		\$331,200							
	Recalculate	ed Amtz. Of CIAC balance above		(320,943)				*			

\$10,257

Sanlando-Wastewater Recalculation of CIAC and Amortization of CIAC

Retained Earnings Adjustment

		to I milet manufacture of the te									
			UPIS	UPIS	CIAC	CIAC	CIAC	CIAC	CIAC	CīAC	CIAC
	t. Nos	. The second	Balance	Balance	Allocation	Additions	Balance	Amtz.	Amtz.	Amtz.	Amtz
UPIS	CIAC	Acct. Description	@12/31/02	Percentage	@12/31/02	Jan-Jun '03	@12/31/02	Rate	Jan-Jun '03	Jul-Dec '03	Total
3542011	2721011	Lift Station	\$1,674,306	11.83%	\$1,345,958	_0	\$1,345,958	3.13%	\$21,031	\$21,031	\$42,061
3547003	2721003	Structures & Imp.	266,024	1.88%	213,854	0	213,854	3.13%	3,341	3,341	6,683
3547012	2721012	Spray Irrigation Facilities	0	0.00%	0	0	0	3.13%	0	0	0
3602006	2721006	Sewage Service Lines	72,206	0.51%	58,045	0	58,045	3.33%	967	967	1,935
3602007	2721007	Force Mains	80,326	0.57%	64,573	0	64,573	3.33%	1,076	1,076	2,152
3612008	2721008	Sewer Mains	6,797,352	48.04%	5,464,322	0	5,464,322	2.22%	60,715	60,715	121,429
3612010	2721098	Manholes	38,638	0.27%	31,060	0	31,060	2.22%	345	345	690
3804004	2721004	Sewer Lagoons	0	0.00%	0	0	0	2.86%	0	0	0
3804005	2721005	Treatment Plant	4,577,903	32.35%	3,680,129	0	3,680,129	2.86%	52,573	52,573	105,147
3824009	2721009	Outfall Lines	<u>644,005</u>	4.55%	<u>517,709</u>	<u>o</u>	<u>517,709</u>	3.33%	<u>8,628</u>	<u>8,628</u>	<u>17,257</u>
			\$14,150,761	100.00%	\$11,375,653	0	\$11,375,653		\$148,677	\$148,677	\$297,355
271	CIAC Balan	nce per T/B @12/31/02	\$11,569,532								
2/1		e portion of CIAC	(20,233)								
	Less Tap Fe	•	(20,233)								
		CIAC Sub-Acct. Balance	(173,646)								
		i CIAC balance	\$11,375,653								
	Ollidentified	CIAC balance	\$11,575,055								
271	CIAC Addit	tions (Jan-Jun '03)	\$376								
407.6	Amtz. Of Cl	IAC Expense @12/31/03		\$302,931							
70.10		es Amtz of CIAC (Jan-Jun '03)		(194)							
		es Amtz of CIAC (Jul-Dec '03)		(270)							
		Amtz, Of CIAC Sub-Acct. Balance		(4,719)							
		d Amtz. Of CIAC balance		\$297,748							
		d Amtz. Of CIAC balance above		(297,355)							
		a a minute of the control of the con		0202						•	

SUBJECT: POTENTIAL UNRECORDED CIAC

SUMMARY: The utility provided copies of developer agreements that indicated what contributed property has been received since its last rate case proceeding in Docket No. 98067-WS. The utility's records, however, do not reflect additions to utility plant in service (UPIS) or contributions in aid of construction (CIAC) for any of the developer agreements provided.

STATEMENT OF FACT: The utility provided the audit staff with a detailed schedule of CIAC and tap fee connections to support its recorded CIAC additions for the years 1998 through 2005 and all developer agreements during that time. Several of the developers' agreements indicated that off-site facilities were being contributed to the utility. The utility had recorded some contributed property in its ledger but not for all of the developer agreements we examined.

The recording of contributed property would have no net effect on the utility's net rate base, and O&M expenses because the asset and expense accounts would offset each other. The NARUC Uniform System of Accounts, however, requires recording all UPIS and CIAC additions to the general ledger.

Below is a list of development agreements discovered that state that UPIS was contributed.

<u>Developer</u>
CDL Group Inc.
Signature Home Construction Inc.
Signature Home Construction Inc.
Wendy's International, Inc.
Graham Contruction Company, Inc.
Reiche and Silliman, Inc.
Innorest Properties, LLC
P & B Custom Homes, Inc.

In addition, the utility does not keep invoices provided by a developer to support the original cost for the UPIS and CIAC addition. For the developers whose property was recorded, the utility could not provide us with any documentation except the actual journal entry.

The audit staff defers this issue to the analyst in Tallahassee for disposition.

EFFECT ON GENERAL LEDGER: When an amount of contributed assets is determined, UPIS and CIAC should be increased and the corresponding additions should then be depreciated and amortized at the same rates as prescribed in Rule 25-30.140, F.A.C. and recorded in the appropriate rate base accounts.

EFFECT ON FILING: All of the above balances, when determined, would be offsetting so that there in no effect on the filing.

SUBJECT: INFORMATION ON CAPITAL STRUCTURE BALANCES

SUMMARY: The utility's 13-month average capital structure balance is \$232,281,183 as of December 31, 2005 and its cost rate for long-term and short-term debt is 6.58 percent and 5.14 percent, respectively.

STATEMENT OF FACT: The utility's filing reflects the following capital structure balances prior to the reconciliation with base as of December 31, 2005.

Class of Capital	Prior Year 12/31/2004	Test Year 12/31/2005	13-Month Average	Cost Rate
Long Term Debt	\$112,803,215	\$135,285,191	\$133,025,102	6.65%
Short Term Debt	18,768,000	3,926,000	\$4,522,923	5.01%
Common Equity	88,963,597	92,611,247	\$91,510,699	11.78%
Customer Deposits	118,402	125,339	\$123,053	6.00%
Acc. Deferred Income Tax	<u>42,548</u>	208,872	<u>\$125,710</u>	0.00%
Totals	\$220,695,762	\$232,156,649	\$229,307,487	

The Commission's Division of Regulatory Compliance and Consumer Assistance, at the request of The Division of Economic Regulation, performed an affiliate transaction audit of Utilities, Inc. and its subsidiary WSC for the 12-month period ended December 31, 2005, in Docket No. 060253-WS. The scope of the audit included a review of the Utilities, Inc., the parent, capital structure component balances as of December 31, 2005. The audit report, issued July 15, 2006, determined the following 13-month average balances for Sanlando's parent, Utilities Inc. as of December 31, 2005.

		Prior Year	Test Year	13-Month	
	Class of Capital	12/31/2004	12/31/2005	Average	Cost Rate
	Parent Level				
	Long Term Debt	\$112,803,215	\$135,285,191	\$133,025,102	6.58%
	Short Term Debt	18,768,000	3,926,000	\$4,403,615	5.14%
*	Common Equity	92,087,507	95,673,345	\$94,603,703	
	Sanlando Level				\$ 1.00 m
**	Customer Deposits	118,402	125,339	\$123,053	6.00%
**	Acc. Deferred Income Tax	42,548	208,872	<u>\$125,710</u>	0.00%
	Totals	\$223,819,672	\$235,218,747	\$232,281,183	

^{*} The cost rate for common equity to be determined after reconciliation to the utility's average rate base.

^{**} These balances do not include other audit adjustments in this report where applicable.

Based on the above-mentioned affiliate audit report findings the 13-month average common equity balance should be increased by \$3,093,004 (\$94,603,703 - \$91,510,699), the long-term debt cost rate should be reduced by 0.07 percent (6.65% - 6.58%) and the short term debt cost rate should be increased by 0.13 percent (5.14% - 5.01%) as of December 31, 2005.

EFFECT ON GENERAL LEDGER: None, because capital structure balances are only used in rate case proceedings

EFFECT ON FILING: To be determined by the analyst in Tallahassee.

SUBJECT: INFORMATION ON DEFERRED TAXES

SUMMARY: The utility reports \$208,872 upon its books in net deferred income taxes in 2005. This amount is reported at 13-month average as \$125,710. As a result of our testing as described below, the average balance used in this case should be changed from \$125,710 by \$135,573 to report \$261,283. This amount contains estimates which have been presented to the utility are subject to adjustments based upon further findings during this case.

Calculations:	Average	Year End
Beginning Balance	\$125,710	\$208,872
Deferred Income Tax		
Corrections		
State Depreciation	17,623	17,296
State Intangible	17,265	17,669
Federal Intangible	100,685	103,040
Federal Depreciation	Pending	Pending
Total	\$261,283	\$346,877

EFFECT ON FILING: If all the findings are accepted there is no direct effect on rate base or utility income. The capital structure effect is to reduce the provision for equity and debt by \$135,573 and increase deferred taxes by \$135,573.

Deferred Taxes - Item 1: Accelerated Depreciation - State of Florida

When the utility takes tax benefits due to accelerated depreciation, the utility must record deferred income taxes. In this case, the utility failed to record sufficient state deferred taxes in its accounts. The estimated correction at average is \$17,623 and at year end is \$17,296.

EFFECT ON GENERAL LEDGER:

NARUC		
Acct. No. Acct. Description	<u>Debit</u>	<u>Credit</u>
215 Retained Earnings	\$17,296	
190 State Deferred Taxes – Depreciation		\$17,296

Deferred Taxes -- Item 2: Deferred Taxes Intangible Plant - Federal and State of Florida Intangible plant is recorded as an asset in water and sewer plant accounts as either organization plant or as franchise plant. For income tax purposes, this intangible plant is expensed and deferred taxes are recorded. Intangible plant and deferred taxes for intangible plant during the normal course of business are not reduced unless a utility's assets are sold.

Utility intangible plant did not match the expected balance of deferred income taxes. Further the State of Florida deferred taxes had not been properly recorded. The estimated correction to Federal deferred accounts at average is \$100,685 and at year end is \$103,040. The estimated correction to state deferred account is \$17,265 at average and at year end is \$17,669.

EFFECT ON GENERAL LEDGER:

NARUC			
Acct. No	Acct. Description	<u>Debit</u>	<u>Credit</u>
215	Retained Earnings	\$120,706	
190	Federal Deferred Taxes - Intangible Plant		\$103,040
190	State Deferred Taxes - Intangible Plant		\$17,669

Deferred Taxes -- Item 3: Accelerated Depreciation - Federal

Accelerated depreciation is a difficult account for a utility to maintain and difficult for the Commission to audit. We found there was a possibility of errors and non utility effects in the account. There was not enough available audit time for staff to verify the details in this account sufficiently to comment the account was free of error, free of non utility effects and reflected necessary Commission adjustments appropriately.

Absent available audit resources, we have asked the utility to present additional information concerning its deferred taxes in this matter. Absent additional audit procedures, we recommend industry staff use reported plant additions, retirements and Commission adjustments along with known state and federal depreciation rates to determine what level for Federal Accumulated Deferred Income Tax is reasonable. Once a Federal Deferred Tax – Accelerated Depreciation level is set, it would be appropriate to revise the estimate presented in item 2: Deferred Taxes – Accelerated Depreciation State of Florida.

Possible Accounts Affected upon General ledger:

Retained Earnings
State Deferred Income Taxes – Depreciation
Federal Deferred Income Taxes – Depreciation
State Non Utility Deferred Income Taxes – Depreciation
Federal Non Utility Deferred Income taxes -- Depreciation

Deferred Taxes -- Item 4: Accounting for Post 2000 Tap Fees

Treasury Regulation Section 1.118-2(b) (3) excludes customer connection fees from the definition of CIAC for tax purposes. Therefore, Commission staff has advised that subsequent to the year 2000, CIAC in the form of cash tap fees paid to the utility is taxable. This appears to be a significant item in future utility accounting and ratemaking.

The utility records the effects of (1) taxable CIAC and (2) its amortization correctly in its deferred tax accounts, but the also utility reports (3) additional book depreciation in its reports

where no book depreciation exists. Further, it appears that the taxable CIAC effects are at an accelerated rate rather than the straight line rate used by the utility. This reporting does not affect the setting of rates in this case, but it clouds the auditing and determination of deferred taxes and the utility's ongoing and future reports such as annual report schedule F-23 and MFR schedules C-1 and C-2, and C-5. Clarification on this matter is needed.

From the auditor's perspective, it appears the proper accounting for taxable CIAC is to treat the amortization of tax on CIAC as income statement amortization and not provide a corresponding provision for income taxes on this amortization in ratemaking. Treating this item entirely in deferred tax accounts on the balance sheet seems to cause long-lived problems in assessing the impact of taxable CIAC and accelerated depreciation on rates.

Deferred Taxes -- Item 5: Error in Utility MFR

Utility information contained in its filing schedules C-1, C-2 and C-5 that report the provision for income taxes did not match utility schedule B-1 or Annual Report Schedule F-23 or Annual Report Schedule F-3. This type of error causes audit inefficiencies. Staff has relied upon annual report schedules during this audit of deferred income taxes.

SUBJECT: INFORMATION ON FUTURE UTILITY OBLIGATIONS AND BENEFITS

SUMMARY: The utility has entered into a third-party agreement that may entail future benefits or obligations.

STATEMENT OF FACT: A Memorandum Agreement between Sanlando Utilities Corp. and The Florida Conference Association of Seventh Day Adventist was discovered by the audit staff in a search of Seminole County property records. The memorandum, executed on December 20, 2002, was recorded in Book 4720 Pages 657-659, of the Seminole County Clerk of the Court Official records.

The utility provided the following response to the audit staff's inquires.

- 1. The Memorandum of Agreement between FCASDA and Sanlando describes a resolution to a problem brought about by a proposed development known as Mirror Lake Commercial Park in 2002. The four lot commercial project is bisected from east to west by the service area boundary line between Sanlando Utilities and Seminole County Environmental Services. The four proposed lots in the commercial park are partially in Sanlando's service area and partly in Seminole County's service area. In 2002, FCASDA orchestrated the purchase and demolition of some single family homes that were situated in the county's service area. They had been the Seminole County's W&S customers. This residential property was rezoned as commercial, and then combined with the undeveloped land owned by FCASDA in Sanlando's W&S service area to create Mirror Lake Commercial Park. Since the commercial property overlapped the two adjacent service areas, Sanlando and Seminole County entered into an agreement with FCASDA wherein Sanlando agreed to provide sewer service to the four lots and Seminole County agreed to provide metered water service, with the meters to be read by Sanlando in order to compute the sewer bills for its customers. FCASDA agreed to pay Sanlando for the loss of four future water customers at a rate of \$1.43/gpd of water capacity at the point in time when the county issued building permits for each of the four lots. To date, no money has been collected from FCASDA and all four lots are vacant. Currently planned use for lot four is a county fire station and a Seven Eleven convenience store is to be located in Lot 1. Lots 2 and 3 are on the market.
- 2. Sanlando benefited from this arrangement by virtue of providing a resolution to the question of how the property might be served with both water and sewer service even though the commercial park was situated in both service areas. In the absence of a resolution, Sanlando would have lost the opportunity to provide sewer service to four future general service customers and thereby lost the revenue produced from the provision of this service. Sanlando would also have lost an opportunity to make use of existing water and sewer treatment capacity at the Wekiva water and wastewater plants. In addition, the developer agreed to reimburse Sanlando for the loss of four future water customers. In essence, FCASDA agreed to "purchase" the four prospective customers at a rate that would be calculated from the capacity required to serve the property if the property had been situated within Sanlando's service area.
- 3. No entries have been made in the general ledger because Sanlando has not received any payments. Accounting needs to determine the proper disposition of the proceeds when FCASDA eventually make payment. Since the portion of the park that is within Sanlando's

- service area is unimproved, there was not any need to replace or retire existing water or sewer services.
- 4. FCASDA agreed to pay the cost to relocate existing water and sewer facilities that were in conflict with the proposed layout of Mirror Lake Commercial Park. This included the relocation of a 12" water main and a 6" sanitary force main where they crossed Lot 4. The 12" water main serves as a two-way metered emergency interconnect between Sanlando and Seminole County's water systems. The 6" force main conveys raw wastewater from the county's sewer system to Sanlando's collection system as per a bulk sewer agreement between the two parties.
- 5. I don't envision any costs to Sanlando as a result of this agreement. The obvious benefit will be the collection of future sewer revenue from the provision of sewer service to four future general service customers. Each individual sewer customer will be required to make connection to Sanlando's facilities at its cost.

The audit staff defers this issue to the analyst in Tallahassee.

SUBJECT: INFORMATION ON CONTINUING MAINTENANCE PLAN

SUMMARY: The utility's wastewater O&M expense may be overstated.

STATEMENT OF FACT: The utility has established a continuing maintenance plan to televise, video, clean and repair ten percent of its sanitary sewer pipes each year.

In 2005, the utility charged \$89,068 for this project to Acct. No. 7754011 - Sewer Rodding. This account is included in the filing in wastewater Acct. No. 720 - Material and Supplies for the test year.

If the utility does not continue to expend a like amount for each succeeding year after the test year, the associated O&M expense in the filing may be overstated.

The audit staff defers this issue to the analyst in Tallahassee.

Schedule of Water Rate Base

Florida Public Service Commission

Company: Sanlando Utililies Corporation Docket No.: 050258-WS Schedule Year Ended: 12/31/05 Interim [] Final [x] Historical [x] Projected [] Schedule: A-1 Page 1 of 1 Preparer: Scott D. Fogelsanger

Explanation: Provide the calculation of average rate base for the test year, showing all adjustments.

	(1)	(2) Average	(3)	(4) Adjusted	(5)
Line No.		Balance Per Books	Uliity Adjustments	Utility Balance	Supporting Schedule(s)
1	Utility Plant in Service	\$15,392,075	\$455,549 A,B,C,D	\$15,847,624	A-5
2	Utility Land & Land Rights	123,772	. 0	123,772	A-5
3	Less: Non-Used & Useful Plant	. 0	0	0	A-7
4	Construction Work in Progress	o	0	0	
5	Less: Accumulated Depreciation	(8,283,471)	(21,327) E,F	(8,304,798)	A-9
6	Less: CIAC	(11,463,717)	0	(11,463,717)	A-12
7	Accumulated Amortization of CIAC	7,208,315	o	7,208,315	A-14
8	Acquisition Adjustments	0	0	0	•
9	Accum. Amort. of Acq. Adjustments	0	0	0	•
10	Advances For Construction	. 0	o	0	A-16
11	Working Capital Allowance	115,186	o	115,186	A-17
12	Total Rate Base	\$3,092,160	\$434,222	\$3,526,382	•

Schedule of Wastewater Rate Base

Florida Public Service Commission

Company: Santando Utilities Corporation Docket No.: 080258-WS Schedule Year Ended: 12/31/05 Interim [] Final [X] Historical [X] Projected []

Schedule: A-2 Page 1 of 1

Preparer: Scott D. Fogelsanger

Explanation: Provide the calculation of average rate base for the test year, showing all adjustments.

	(1)	- (2) Average	(3)		(4) Adjusted	(5)
No.	-	Balance Per Books	Utility Adjustments		Utility Balance	Supporting Schedule(s)
.1	Utility Plant in Service	\$22,423,326	\$1,086,168	A,B.C,D	\$23,509,494	A-6
2	Utility Land & Land Rights	202,552	0		202,552	A-6
3	Less: Non-Used & Useful Plant	0	0		oʻ.	A-7
4	Construction Work in Progress	0	0		0	
5	Less: Accumulated Depreciation	(10,546,485)	171,623	E,F	(10,374,862)	A-10
6	Less: CIAC	(12,337,150)	0		(12,337,150)	A-12
7	Accumulated Amortization of CIAC	8,278,582	0		8,278,582	A-14
8	Acquisition Adjustments	0	0		0	•
9	Accum. Amort. of Acq. Adjustments	0	0		o.	P
10	Advances For Construction	0	0		0	A-16
11	Working Capital Allowance	291,995	0		291,995	A-17
12	Total Rate Base	\$8,312,820	\$1,257,791		\$9,570,611	

Schedula of Water Net Operating Income

Company: Saniando Utilities Corporation Docket No.: 060256-WS Schedule Year Ended: 1273/105 Interim [] Final [x] Historics! [x] or Projected { } Florida Public Service Commission

Schedule: B-1 Revised Page 1 of 1 Preparen Scott D. Fogelsanger

Explanation: Provide the calculation of net operating income for the test year. If amortization [Line 4] is related to any amount other than art acquisition adjustment, submit an additional schedule showing a description and calculation of charge.

Line	· (1)	(2) Balance Per	(3) U\$Riy Test Year		(4) Unity Adjusted	(ସ Requested Revenue		(6). Requested Annual	(?) Supporting
No.	Description	Books	Adjustments		Test Year	Adjustment		Revenues	Schedule(s)
1	OPERATING REVENUES	\$2,052,465	\$33,492	A	\$2,085,957	\$420,905	F	\$2,505,862	8-4
2	Operation & Maintenance	\$1,408,097	\$174,176	В	\$1,582,273	\$23,847	G	\$1,606,120	8-5
3	Depreciation, net of CIAC Amort,	161,254	44,929	C	226,183			226.183	8-13
4	Amortization	6,313	6,600	D	11,913			11,913	
5	Taxes Other Than Income	227,119	6,034	E	233,153	21,697	н	254,650	B-15
6	Provision for Income Taxes	35,074			35,074	70,658	i	105,762	C-1
7	OPERATING EXPENSES	\$1,856,657	\$231,739		\$2,088,596	\$115,232		\$2,204,828	
å	NEY OPERATING INCOME	\$195,608	(\$198,247)		(\$2,639)	\$304,673		\$302.034	
9	RATE BASE	\$3,092,669 *********			\$3,526,382			\$3,526,382	
10	RATE OF RETURN	6.32 %			-0.07%			8.56%	

Schedule of Wastewater Net Operating Income

Company: Senlando Utilities Corporation Docket No.: 060258-WS Schedule Year Ended: 12/31/05 Interm (] Finit [x] Historical [x] or Projected () Figrids Public Service Commission

Schedule: B-Z Revised Page 1 of t Prepared Scott D. Fogelsanger

Explanation: Provide the calculation of net operating income for the test year. It amortization (Line 4) is related to any amount other than an acquisition adjustment, submit an additional schedule showing a description and calculation of charge.

Line No.	(i) Description	Estance Per Books	(3) Utility Test Year Adjustments		(4) Utility Adjusted Test Year	(5) Requested Revonue Adjustment		(5) Requested Annual Revenues	(7) Supporting Schedule(s)
1	OPERATING REVENUES	\$9,287.465	\$44,199	A.	\$3,331,884	\$691,470	F	\$4.023,154	8-4
5	Operation & Maintenance	\$1,997,793	\$167,948	8	\$2,165.741	\$18.737	G	\$2,184,478	B-6
. 3	Depreciation, net of CIAC Amort.	291,577	50,953	С	342,530			342,530	6-14
4	Amortization	2,205	24,600	D	26,805			26,805	
5	Taxes Other Than Income	305,428	6,552	E	310,980	35.556	н	345,536	8-15
6	Provision for Income Taxes	126,411			126,411	176.672	1	303.083	C-1
7 -	OPERATING EXPENSES	\$2,723,414	\$249.053		\$2,972,467	\$230.965		\$3,203,432	
8	NET OPERATING INCOME	\$564,071 ********	(\$204,854)		\$359,217	\$460,505		\$819,722	
9	RATE BASE	\$8,312,820 ********			\$9,570,611			\$9,670,611	
10	RATE OF RETURN	6,79% *******			3.75% *******			8.56%	

Schedule of Requested Cost of Capital Beginning and Year End Average

Company: Sanlando Utilities Corporation Docket No.: 060258-WS Schedule Year Ended: 12/31/05 Interim [] Final [x] Historical [x] Projected [] Florida Public Service Commission

Schedule D-1 Revised Page 1 of 1 Preparer: Kirsten E. Weeks

Explanation: Provide a schedule which calculates the requested cost of capital on a thirteen month average basis. If a year-end basis is used, submit an additional schedule reflecting year-end calculations.

	(1)	(2) Reconciled to Requested Rate Base	(3)	(4)	(5)
Line No.	Class of Capital	AYE 12/31/05	Ratio	Cost Rate	Weighted Cost
. 1	Long Term Debt	7,460,967.00	\$6.97%	6.65%	3.79%
. 2	Short Term Debt	253,110.00	1.93%	5.01%	0.10%
3	Preferred Stock	•	0.00%	0.00%	0.00%
4	Common Equity	5,134,153.00	39.20%	11.78%	4.62%
5	Customer Deposits	123,053.00	0.94%	6.00%	0.06%
6	Tax Credits - Zero Cost	•	0.00%	0.00%	0.00%
7	Tax Credits - Weighted Cost	•	0.00%	0.00%	0.00%
8	Accumulated Deferred Income Tax	125,710.00	0.96%	0.00%	0.00%
9	Other (Explain)		0.00%	0.00%	0.00%
10	Total	13,096,993.00	100.00%		8.56%

Note: Since the equity ratio is less than 40.00%, an 11.78% cost rate has been used.

Note: Long term debt, short term debt, preferred stock, and common equity are actual for Sanlando Utilities Corp's parent company, Utilities, Inc.

Supporting Schedules: D-2 Recap Schedules: A-1, A-2