

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Analysis of UTILITIES, INC.'S
financial accounting and customer service
computer system

Docket No.: 120161-WS

NOTICE OF FILING

UTILITIES, INC., by and through its undersigned counsel, hereby gives notice of filing in the above-referenced docket, the Direct Testimony of Lawrence A. Danielson.

CERTIFICATE OF SERVICE

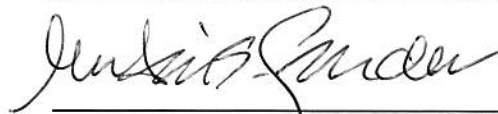
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via e-mail this 14th day of February, 2014, to:

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Respectfully submitted this 14th day of
February, 2014, by:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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DIRECT TESTIMONY

OF

Lawrence A. Danielson

on behalf of

Utilities, Inc.

1 **I. Introduction and Qualifications:**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Lawrence A. Danielson. My business address is Deloitte Consulting LLP,
4 100 Kimball Drive, Parsippany, New Jersey, 07054.

5 **Q. WHAT IS YOUR OCCUPATION AND WHO ARE YOU ASSOCIATED WITH?**

6 A. I am a Principal at Deloitte Consulting LLP.

7 **Q. PLEASE SUMMARIZE YOUR PROFESSIONAL EXPERIENCE.**

8 A. I have over 30 years of experience leading large-scale transformation at one of the
9 largest companies in the world. I have been with Deloitte for nearly 26 years and have
10 consulted to the leadership of a broad range of multinational clients. My client services
11 practice focuses on helping large and small businesses make significant business
12 changes including various aspects of transformation such as: business process design,
13 organizational design, information technology, strategic planning, business application
14 installation, mergers/acquisitions, strategic cost reduction, large-scale program
15 management, productivity improvement, outsourcing advisory, business case
16 development and technology maintenance & support.

17 **Q. WHAT ARE YOUR PRIMARY RESPONSIBILITIES AS A PRINCIPAL IN
18 DELOITTE CONSULTING?**

19 A. As a Principal at Deloitte Consulting, I lead engagements at some of Deloitte's largest
20 and most visible clients. I am a Lead Consulting Principal at several of our largest
21 clients and a leader in our National Technology practice. I publish and speak on a
22 regular basis at important industry meetings where my presentations typically address
23 current topics that impact the future of business and technology. I am a hands-on leader
24 and work actively with our project teams to implement large scale change in our client
25 organizations. Most of my work involves helping clients fix problems or lead programs

1 where in-house expertise does not exist.

2 **Q. ON WHOSE BEHALF ARE YOU APPEARING?**

3 A. I am appearing in this proceeding on behalf of Utilities Inc. (“Utilities Inc.” or “UI”).

4 **II. Purpose of Testimony**

5 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

6 A. I was asked by Utilities Inc. to provide my opinions on a particular issue in connection
7 with the findings of Florida PSC regarding rate increases filed in Florida by various
8 subsidiaries of Utilities Inc. Specifically, I was asked to opine on whether the costs
9 incurred by UI for Project Phoenix, a finance transformation and customer service
10 project undertaken between 2006 and 2008, to determine if it would have had
11 significantly different costs if UI’s customer base during the time of project scoping,
12 sizing and planning had been 10% less.

13 In preparing this testimony, I have reviewed materials in Florida PSC Docket
14 No. 090392-WS that is related to this case, as well as documentation from Project
15 Phoenix. Such materials included project planning and scoping documents, pricing
16 documents, including consulting statements of work and vendor Request For Proposal
17 (RFP) and billing statements for systems, project status reports, project steering
18 committee presentations and various project deliverables.

19 **III. Project Phoenix – Deloitte Engagement Background**

20 **Q. WHY WERE YOU ASKED TO PROVIDE YOUR OPINION BY UTILITIES**
21 **INC.?**

22 A. I served as the engagement principal throughout the period Deloitte Consulting was
23 engaged by Utilities Inc. to provide assistance with Project Phoenix. In my role, I
24 conducted overall program direction, quality assurance, client management plus
25 coordinating the Deloitte resources performing the engagement. My professional

1 experience has included similar projects at a broad range of clients. I have deep
2 experience, spread over 30 years making improvements in the operations, systems and
3 organizational structures.

4 **Q. WHAT DID YOU UNDERSTAND TO BE THE REASON BEHIND PROJECT**
5 **PHOENIX?**

6 A. It is my understanding Project Phoenix was undertaken by Utilities Inc. as a corporate
7 initiative involving transformation of its older legacy finance and customer service
8 functions, in order to enable stronger financial controls, greater operational
9 effectiveness and enhanced customer service. UI Management deemed the then
10 existing finance and customer service processes and systems inadequate to support the
11 organization's long term business objectives. Their current systems and applications,
12 as they aged, were not able to support future business objectives and the costs to support
13 these systems would continue to escalate over time. It is my understanding that through
14 this initiative, Utilities Inc. wanted to create greater financial transparency by
15 enhancing and integrating its finance processes, customer service, and supporting
16 applications/controls across their enterprise.

17 **Q. WHAT WAS THE DURATION OF DELOITTE'S ENGAGEMENT?**

18 A. Deloitte Consulting was engaged by Utilities Inc. pursuant to an engagement letter
19 dated June 9, 2006 to assist with the planning and execution of Project Phoenix. The
20 initial engagement phase was a 12-14 week period between June and September 2006.
21 Subsequent phases were added as additional assistance was requested. Deloitte
22 Consulting services ended in June 2008. After that period of time, we were available
23 to answer periodic questions from Utilities Inc.

24 **Q. WHAT WAS THE SCOPE OF DELOITTE'S ENGAGEMENT?**

25 A. Deloitte Consulting was initially engaged to evaluate the finance and operational areas

1 and then create an implementation plan to enhance operations and address identified
2 shortcomings. This included a current state assessment of finance and customer service
3 processes along with recommendations, finance and customer service process
4 redesigns, system requirement definitions and assistance with vendor selection
5 (*EXHIBIT LAD-1*). The scope of the engagement was later expanded to include
6 assistance with design and implementation of the finance and customer service
7 systems. Design and implementation of each system selected was divided into four
8 phases – detailed design, build & data conversion, test & train and rollout & support.
9 Deloitte Consulting also provided additional support work as requested.

10 **IV. Impact on Project Phoenix costs from a 10% lower customer base**

11 **Q. WHAT WERE THE MAJOR COMPONENTS OF PROJECT PHOENIX**
12 **COSTS?**

13 A. It is important to note that the scope of Project Phoenix not only included the selection,
14 design and implementation of JD Edwards and Oracle SPL to support its finance and
15 customer service functions, respectively. It also included a re-design of the finance
16 function, including organization and processes supporting the function, setting up of
17 networks, mobile devices and purchases of hardware and other equipment to replace
18 legacy items that UI Management deemed to be unsuitable to support the future state
19 design. Additionally, as is common for a project of this magnitude and complexity,
20 costs also included initial project management, change management, training, travel
21 and other expenses (*EXHIBIT LAD-2*). Thus major components of cost for Project
22 Phoenix consisted of professional services fees for approximately 75%, hardware,
23 software, network and vendor licenses for approximately 15% and training, travel and
24 other expenses for approximately 10%.

25 **Q. WHAT IS YOUR UNDERSTANDING OF THE METHODOLOGY USED TO**

1 **ALLOCATE THE COSTS INCURRED IN PROJECT PHOENIX?**

2 A. Project Phoenix was planned and executed as a corporate wide initiative intended to
3 benefit all of Utilities Inc. subsidiaries. It is my understanding that the overall approach
4 used by Utilities Inc. in its rate increase proposal was to allocate the costs to its
5 subsidiaries, with each subsidiary receiving a pro rata allocation based on the number
6 of customers served by the subsidiary and the total number of customers in all of
7 Utilities Inc. subsidiaries. Please note that Utilizes Inc. performed this analysis.
8 ***(EXHIBIT LAD-3)***.

9 **Q. PLEASE DESCRIBE THE ISSUE YOU ARE PROVIDING OPINION ON**

10 A. Subsequent to the completion of Project Phoenix, Utilities Inc. divested several of its
11 subsidiaries between 2009 and 2013. The subsidiaries were part of Utilities Inc. when
12 the Project Phoenix was scoped, designed and implemented. It is my understanding that
13 in calculating its proposed rate increase using the pro rata method mentioned above,
14 Utilities Inc., pursuant to its corporate policy, excluded the customers of the divested
15 entities and allocated the costs to the remaining subsidiaries. Florida PSC contends
16 that this method effectively reallocates the amounts allocable to the divested
17 subsidiaries to the remaining ones without any additional benefit to the remaining
18 subsidiaries. As the number of customers belonging to the divested Florida subsidiaries
19 comprised approximately 10% ***(EXHIBIT LAD-4)*** of all Utilities Inc. subsidiaries
20 nationwide, the PSC concluded that the costs allocated to the remaining subsidiaries
21 should be reduced by the same percentage and the proposed rate increase be adjusted
22 accordingly. The key issue that I have been asked to provide my opinion on is whether
23 the cost incurred by Utilities Inc. for Project Phoenix would have been materially
24 different had the total customer base during the scoping, planning and implementation
25 of the project had been 10% lower.

1 **Q. WOULD A 10% DECREASE IN THE CUSTOMER BASE HAVE IMPACTED**
2 **THE DESIGN OF THE SOLUTION OR SELECTION OF VENDORS?**

3 A. No. Prior to the systems selection, a detailed assessment of Utilities Inc.'s current state
4 of finance and customer service process and systems was conducted in an effort to
5 understand its weaknesses, Consequently, a thorough understanding of the targeted
6 future state was developed. It was established that Utilities Inc. needed a transformation
7 of its finance and customer service processes and systems in order to build and support
8 its desired future state. A series of activities were conducted in order to; plan, design
9 and implement new processes. A rigorous vendor selection process was also
10 undertaken for the finance and customer service systems in an effort to select vendors
11 that met the defined objectives from both cost and capability perspectives (*EXHIBIT*
12 *LAD-5*). In conducting these activities, various factors were taken into consideration,
13 including; the number and geographical distribution of subsidiaries and customers,
14 elements impacting the industry sector, the requirements of the finance and customer
15 service organizations, availability of adequate network coverage in those geographic
16 areas, cost, among others. All of these activities are considered essential to design a
17 solution for an initiative of this size and complexity; therefore these same activities
18 would have been conducted even if the customer base was 10% smaller. Further, the
19 systems selected, JD Edwards for financials and Oracle SPL, would have been selected
20 even with a 10% lower customer base because the business and technical requirements
21 would not have changed.

22 **Q. WOULD A 10% DECREASE IN THE CUSTOMER BASE HAVE A**
23 **MATERIAL IMPACT ON THE COST OF THE SOLUTION THAT WAS**
24 **IMPLEMENTED?**

25 A. No.

1 The costs associated with the implementation of the solution or the selection of the
2 vendors would not have changed. Thus, performing the business analysis, deriving
3 business requirements and subsequent design of the software is not dependent on
4 customer volume.

5 It should be recognized that there is not a linear (one to one) relationship between the
6 number of customers and the number of system users. Customers do not directly use
7 the technology, but system users (defined as those internal Utilities Inc. personnel that
8 handle customer queries, payments, reimbursements, perform various accounting
9 processes, etc.) do use the system. As such, if additional customers are added there is
10 not an addition of the same number of systems users. In fact, a key decision for Utilities
11 Inc. to select the technology that they did was to increase business capabilities (i.e.
12 adding new customers, adding new system users, improving customer service,
13 remediating finance control issues, etc.) without adding additional Utility Inc.
14 employees and selecting different technologies.

15 An increase of 10% in customers does effect the implementation of network and
16 hardware infrastructure. However, in order to ensure that the systems performs
17 adequately and provides a reasonable level of performance (e.g. a two second response
18 time) the implementation must consider peak transaction times. A common practice is
19 to consider a factor of about 20-25% that typically provides limited impact to the
20 average system user. Therefore, even if a 10 % increase in customers translated into
21 the same numbers of system users, when you consider the peak design principle, there
22 would be no change in the implemantion of the system.

23 **Q. WHAT WOULD HAVE BEEN THE IMPACT OF A 10% DECREASE IN**
24 **CUSTOMER BASE ON PROJECT PHOENIX COSTS AND WHY?**

25 A. In my opinion, any change in the overall cost of Project Phoenix due to a 10% reduction

1 in the customer base would not change the costs of Phoenix. The major components of
2 the cost include:

- 3 • professional services fees (75%),
- 4 • hardware, software and vendor licenses (15%)
- 5 • training, travel and other expenses (10%).

6 The professional services fees include fees paid to Deloitte Consulting for performing
7 the assessment, design, implementation and support services. Hardware, software and
8 vendors license include: costs for technology software vendors Oracle and JD Edwards.
9 And training and expenses respectively.

10 Of the 15% of costs for hardware, software and vendor licenses (Exhibit 4) only
11 \$380,862.00 is for hardware for the network and computing which is the only cost
12 component that would be impacted if the customer size changed 10%.

13 **Q. WHAT IS YOUR CONCLUSION?**

14 A. Based on the reasons stated in this testimony, 85% percent of the total cost are fixed
15 (75%), professional services fees) plus (training, travel and other expenses (10%). Only
16 the hardware portion (network and hardware infrastructure) of the remaining 15%
17 hardware, software and vendor licenses is variable. That leaves about \$380,862 as a
18 total variable cost that can affected by customer volume. If there was a direct
19 relationship with a 10% reduction of customers, that would leave a maximum of
20 approximately \$38,086.00 to be considered. Of this amount, some of which can be
21 attributable to conservative growth and accommodations for peak transaction
22 processing, therefore the number of Utilities Inc. users would not change. This is why
23 I conclude that the impact on the costs of Project Phoenix is very minimal if Utilities
24 Inc. if the customer base decreased by 10% .

25 **Q. DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?**

1 A. Yes, it does.

EXHIBIT LAD-1. Extract from Deloitte Consulting Original Engagement Letter

Deloitte.

Deloitte Consulting LLP
One Prospect Street
Summit, NJ 07901
USA
Tel: 908-673-5600
Fax: 908-673-5201
www.deloitte.com

June 9, 2006

Mr. Lawrence Schumacher
President
Utilities, Inc.
2335 Sanders Road
Northbrook, IL 60062

Dear Mr. Schumacher:

Deloitte Consulting LLP ("Deloitte Consulting") appreciates the opportunity to assist Utilities, Inc. (the "Company"), a portfolio company of AIG Highstar Capital II, L.P. ("Highstar"), with the current state assessment of financial processes and related systems. Based on our discussions with you and John Stokes we understand that Utilities Inc. would like assistance to enhance the financial, regulatory and operational processes, controls, reporting and systems.

This engagement letter is organized into the following sections:

- I. Our Understanding of Your Objectives and Scope
- II. Project Approach and Deliverables
- III. Project Staffing
- IV. Project Timing, Professional Fees and Assumptions

OUR UNDERSTANDING OF YOUR OBJECTIVES AND SCOPE

Based on our discussion we understand that your objectives are to create financial transparency by enhancing and integrating finance processes, supporting applications, controls across the Company and making them scalable for future growth. In addition, you would like to reevaluate the operational areas and create an implementation plan to enhance the operations and address shortcomings identified in the process.

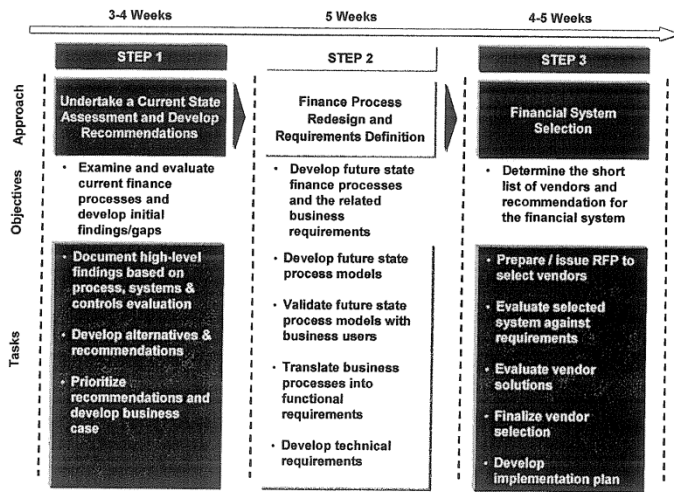
Member of



PROJECT APPROACH AND DELIVERABLES

To help you achieve the overall objectives we would recommend a two phase approach. Phase I will focus on conducting a diagnostic of the current state environment across all cycles in scope and definition of the business requirements and a recommendation for a financial system. Phase II will then focus on the execution against the plan. We have structured our services into three concurrent steps for Phase 1 that align with your objectives. Step 1 will focus on conducting an assessment of the current state, document findings and develop recommendations for areas identified in scope. Step 2 will be targeted towards financial process redesign to develop functional and technical requirements for the financial system. Step 3 will focus on validating these requirements against the potential solutions and assisting in selection of a new (or enhancement of existing) financial system. The high level activities are outlined below:

Mr. Lawrence Schumacher
 June 9, 2006
 Page 3



As a result of the scope and approach outlined above, we expect the following deliverables to be developed:

- High level findings and Recommendations for Improvement
- Functional and technical requirements
- Future state business processes
- Request for Proposal (RFP)
- Vendor Demonstration Scripts
- Vendor Short List
- Business case supporting our recommendations

In addition, during the project we will provide you with a weekly update on the project status, milestones and schedule.

EXHIBIT LAD-2. Project Phoenix Cost breakdown [Source: UI Detailed Design SC Presentation November v9.ppt]

Financial Update

The project financial information below is as of October 20, 2007. This is only for Deloitte Consulting and Oracle CC&B fees and expenses.

	A	B	C	D	(D-A)	E	E – (D-A)
Group / Vendor	Original Budget	Actual to Date	Estimate to Complete	Total	Over / (Under) ¹	New Addendums	Variance ¹
Professional Services – Fees							
Deloitte Consulting	8,936,000 ³	7,453,000	3,248,000 ⁸	10,701,000	1,765,000	2,100,000 ^{7,8}	(335,000)
Oracle CC&B ²	1,880,000	1,343,000	687,000	2,030,000	150,000 ³	150,000	-
Professional Services – Expenses							
Deloitte Consulting	893,000	667,000	313,000	980,000	87,000	210,000	(123,000)
Oracle CC&B ²	352,000	127,000	225,000	352,000	15,000	15,000	-
TOTALS	12,061,000	9,590,000	4,473,000	14,063,000	2,017,000	2,475,000	(458,000)

1. A positive number is an over-budget & a negative number is an under-budget
2. We have assumed that Oracle CC&B will run on-budget
3. Includes addendums 3, 5, 6, 7, 8, 9, 11
4. These are one time costs & do not including recurring costs
5. The breakdown of hardware and software costs has not changed and has been previously provided
6. PCR 003 includes both fees and expenses
7. Addendum 12 for JDE & CC&B Go-Live extensions plus additional resources requested for the 3 day workshop
8. Addendum 14 IT Department Management Activities – \$215K-\$315K (upper range included)

23

Software and Hardware Fees

Breakout of the Software and Hardware Fees in the Financial Update slide.

Group / Vendor	Fees		
	Total Budget ²	Actual to Date	Variance ¹
Software and Hardware³			
Oracle JDE	335,942	340,321	4,379
Oracle CC&B	482,500	482,500	-
CDW	412,000	380,862	(31,138)
IPsoft	43,500	43,500	-
AT&T	10,124	(24,876)	(35,000)
Global Crossing	750	750	-
TOTALS	\$1,284,816	\$1,223,057	(\$61,759)

1. A positive number is an over-budget & a negative number is an under-budget. The variance is calculated to the end of the project
2. Includes all addendums
3. These are one time costs & do not including recurring costs

25

EXHIBIT LAD-3. Extract from Florida PSC Opinion PSC-II-0587-PAA-SU, DOCKET NO. 110153-5U

In 2009, UI divested several Florida subsidiaries including Miles Grant Water and Sewer Company, Utilities, Inc. of Hutchinson Island, and Wedgefield Utilities, Inc., as well as other subsidiaries in other states. In Order No. PSC-I 0-0585-PAA- WS, we found that allocating costs according to ERCs is an appropriate methodology to spread the cost of the Phoenix Project, but we did not find the Phoenix Project costs previously allocated to the divested subsidiaries would be reallocated to the surviving utilities. Because no added benefit was realized by the remaining subsidiaries, we found that was not fair, just, or reasonable for ratepayers to bear any additional allocated Phoenix Project costs. Thus, we ruled that the divested subsidiaries' allocation amounts shall be deducted from the total.

In Order No. PSC-I 0-0407-P AA-SU, we established the total cost of the Phoenix Project as of December 31, 2008, at \$21,617,487 and required UI to deduct \$1,724,166 from the total cost of the Phoenix Project to account for the divestiture of several subsidiaries resulting in a remaining balance of \$19,893,321.5 In this case, staff auditors determined that the Utility did not make the adjustment for the Phoenix Project that we ordered. According to Affiliate Audit Finding No.2, Eagle Ridge showed the Phoenix Project balance at December 31, 2008, to be \$21,545,555. The difference between the Utility's balance and the Commission-ordered balance is \$1,652,234 ($\$21,545,555 - \$19,893,321$). Therefore, UI's balance for the Phoenix Project is reduced by \$1,652,234 to account for the divestiture of subsidiary utilities through 2009. The effect on the filing is a decrease to wastewater plant by \$15,696. Corresponding adjustments shall be made to decrease both accumulated depreciation by \$2,354 and depreciation expense by \$1,570. The depreciation calculation is based on a depreciation life often years for the Phoenix Project.

EXHIBIT LAD-4. Documentation showing the number of ERC's when Project Phoenix was implemented versus current ERCs

State	Dec-08	Dec-13	Change
ARIZONA	8,690	8,608	-82
FLORIDA	86,405	63,210	-23,195
GEORGIA	12,334	12,482	148
ILLINOIS	17,839	17,672	-167
INDIANA	8,394	8,391	-3
KENTUCKY	7,335	7,331	-4
LOUISIANA	20,849	23,864	3,016
MARYLAND	4,593	4,595	2
MISSISSIPPI	0	0	0
NEVADA	19,489	21,006	1,518
NEW JERSEY	1,070	992	-78
NORTH CAROLINA	65,974	54,242	-11,732
OHIO	0	0	0
PENNSYLVANIA	6,386	6,412	26
SOUTH CAROLINA	31,225	32,865	1,640
TENNESSEE	557	563	6
VIRGINIA	5,515	5,988	472
TOTAL	296,653	268,218	-28,435

EXHIBIT LAD-5. Vendor Selection Results Extract

Financial Systems Evaluation: Summary

All four vendors are experienced in serving the mid-sized market and can meet the majority of Utilities, Inc.'s functional requirements without significant gaps. Lawson and JD Edwards appear to be the best fit for Utilities, Inc. Lawson received the highest demonstration scores, but JD Edwards was preferred by the Finance and HR/Payroll staff. Additionally, Lawson is the only vendor that provides an Enterprise Asset Management (EAM) solution that would be required if SPL was selected. However it should be noted that Lawson have only recently acquired their EAM and it has been integrated with Lawson Financials only once. A third party EAM solution may need to be evaluated separately.

Product Eval. Criteria		Lawson ¹	JD Edwards ²	Agresso ³	Great Plains
RFP	Functional - RFP				
	Technical				
	Vendor Overview				
	Cost ⁴				
Demo	Functional - Demonstration				
Overall					

- Highest Rating ○ Lowest Rating
- 1 Does not include Lawson's Enterprise Asset Management module.
- 2 Oracle JD Edwards Enterprise 1
- 3 Agresso is also referred to as Hansen Financials. Agresso only integrates with Hansen CIS.
- 4 Excludes customization costs

Financial Systems Evaluation: Functional - RFP

The functional evaluation considers the vendors' response to the RFP as well as their ability to execute the scenarios in the vendor demonstration. All vendors were selected for demonstrations because their RFP responses indicated that they met most of Utilities, Inc.'s functional requirements.

	Lawson		JD Edwards		Agresso		Great Plains		Scoring Explanation
	RFP	Demo	RFP	Demo	RFP	Demo	RFP	Demo	
General Ledger	9.5	8.9	9.9	9.1	10.0	7.1	9.6	7.1	RFP ▶ Represents the un-weighted score given to each requirement from the vendor RFP responses ▶ Measures the solution's ability to meet Utilities, Inc.'s functional requirements ▶ Range is from 0 -10 based on the level of customization (if the requirement was met "Out of the box" it received a 10 and if it "cannot perform" the requirement it received a 0) Demo ▶ Represents the average score awarded to each demo script by all Utilities, Inc. and Deloitte participants ▶ Measures the solution's ability to demonstrate the functionality described in the scripts ▶ Range is from 0 – 10 based on the ability to perform the script (if the solution "meets all requirements" it received a 10 and if it "does not meet requirements" it received a 0)
Budgeting	9.9	8.8	9.0	8.3	10.0	7.5	9.9	7.5	
Requisitioning	9.9	9.2	9.7	8.5	10.0	7.1	9.9	7.1	
Accounts Payable	9.9	8.8	9.7	8.5	10.0	7.3	9.7	7.3	
Fixed Assets	10.0	9.1	9.7	9.2	7.7	7.6	9.5	7.6	
Repairs and Main.	9.1	8.1	9.9	6.6	7.2	8.8	8.0	7.8	
Capital Projects	9.4	8.3	8.8	8.9	9.9	7.7	7.9	7.7	
Accounts Receivable	6.8	9.9 ¹	8.1	6.7	10.0	8.6	10.0	8.3	
HR and Payroll	9.9	9.2	9.8	9.1	10.0	8.5	9.8	8.5	
Composite	84.4	80.5 ¹	84.6	74.9	84.8	70.2	84.3	68.9	

¹ Lawson did not demonstrate their AR module. If selected with SPL, they would use SPL's AR module. This is the demo score for SPL's AR module.