

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

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

DATE: July 22, 2015
TO: Office of Commission Clerk
FROM: Lynn M. Deamer, Chief of Auditing, Office of Auditing and Performance Analysis
RE: Docket No.: 150091-WS
Company Name: East Marion Sanitary Systems, Inc.
Company Code: WU536 and SU535
Audit Purpose: Transfer of Certificate
Audit Control No: 15-113-4-1

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 a response to the Office of Commission Clerk. There is no confidential work papers associated with this audit.

LMD/cp

Attachment: Audit Report

cc: Office of Auditing and Performance Analysis File

State of Florida



Public Service Commission

Office of Auditing and Performance Analysis
Bureau of Auditing
Miami District Office

Auditor's Report

East Marion Sanitary System, Inc. /East Marion Utilities, LLC.
Application for Certificate of Transfer
Certificate Nos. 496-W and 425-S

As of December 31, 2014

Docket No. 150091-WS
Audit Control No. 15-113-4-1

July 15, 2015

A handwritten signature in black ink, appearing to read "Yen Ngo", written over a horizontal line.

Yen Ngo
Audit Manager

A handwritten signature in blue ink, appearing to read "Jeffery A. Small", written over a horizontal line.

Jeffery A. Small
Reviewer

Table of Contents

Purpose	1
Objectives and Procedures.....	2
Audit Findings	
1: Utility Plant in Service and Accumulated Depreciation.....	6
2: Land and Land Rights.....	10
3: Contributions-in-Aid-of-Construction and Accumulated Amortization of CIAC	11
4: Customer Deposits.....	13
Exhibits	
1: Net Book Value	14

Purpose

To: Florida Public Service Commission

We have performed the procedures described later in this report to meet the agreed-upon objectives set forth by the Division of Accounting and Finance in its audit service request dated April 23, 2015. We have applied these procedures to the attached schedule prepared by the audit staff in support of East Marion Sanitary Systems, Inc./East Marion Utilities, LLC request for a Certificate of Transfer in Docket No. 150091-WS.

This audit was performed following General Standards and Fieldwork Standards found in the AICPA Statements on Standards for Attestation Engagements. Our report is based on agreed-upon procedures. The report is intended only for internal Commission use.

Objectives and Procedures

Background

Definitions

Buyer/Utility refers to East Marion Utilities, LLC.

Seller refers to East Marion Sanitary Systems, Inc.

NARUC refers to the National Association of Regulatory Utility Commissioners.

USOA refers to the NARUC Uniform System of Accounts as adopted by Rule 25-30.115, Florida Administrative Code (F.A.C.), Uniform System of Accounts for Water and Wastewater Utilities.

Utility Information

East Marion Sanitary Systems, Inc. was a Class "C" utility that provided water and wastewater services to a certificated area under the Commission's jurisdiction with the potential to serve 181 single family home sites in Marion County, Florida. The Utility's 2013 Annual Report indicates that it provided water service to approximately 103 customers and wastewater service to approximately 92 customers. No Annual Report for 2014 has been filed as of the date of this report. The Utility's 2014 Regulatory Assessment fees have been paid.

The buyer and seller executed an asset purchase agreement on December 31, 2014, for \$107,000. The transaction was finalized on January 9, 2015. The buyer filed an application for transfer on March 20, 2015. Rate base was last established, as of December 31, 2000, by Order No. PSC-02-1168-PAA-WS, in Docket No. 010869-WS, issued August 6, 2002.

We determined the Utility's Net Book value, as of December 31, 2014, for this report. There was no activity, affecting rate base accounts, posted to the general ledger between the executed purchase agreement and when the sales transaction was finalized.

General

Utility Books and Records

Objectives: The objective was to determine whether the Utility maintains its accounts and records in conformity with NARUC USOA.

Procedures: We reviewed the seller's 2014 general ledger with account descriptions that was provided by the buyer. We determined that the Utility used an accrual method of accounting on a calendar year basis. No exceptions were noted.

Net Book Value

Utility Plant in Service

Objectives: The objectives were to determine whether Utility Plant in Service (UPIS): 1) Consists of property that exists and is owned by the Utility, 2) Additions are recorded at original cost, 3) Retirements are made when a replacement asset was put in service, and 4) Adjustments required in the Utility's last rate proceeding were recorded in its books and records.

Procedures: We could not reconcile the beginning balances for water and wastewater UPIS established in Docket No. 010869-WS, with the Seller's books and records because the Seller did not record any of the adjustments required by Order No. PSC-02-1168-PAA-WS. We scheduled water and wastewater UPIS activity from January 1, 2001 through December 31, 2014, from the Utility's general ledgers and Annual Reports. We traced and verified asset additions using supporting documentation and included retirements where needed. We determined the water and wastewater UPIS balance for each system, as of December 31, 2014. Our recommended adjustments to water and wastewater UPIS balances are discussed in Finding 1.

Land & Land Rights

Objectives: The objectives were to determine whether utility land is: 1) Recorded at original cost, 2) Owned or secured under a long-term lease agreement, and that 3) Adjustments required in the Utility's last rate proceeding were recorded in its books and records.

Procedures: We could not reconcile the beginning balances for water and wastewater Land established in Docket No. 010869-WS, with the Seller's books and records because the Seller did not record any of the adjustments as required by Order No. PSC-02-1168-PAA-WS. In that Order the land balance was removed from rate base because the Utility was leasing the land where the water and wastewater plants are located. The Utility continues to lease the land subsequent to this transfer. We determined the water and wastewater Land balance for each system, as of December 31, 2014. Our recommended adjustments to water and wastewater Land balances are discussed in Finding 2.

Accumulated Depreciation

Objectives: The objectives were to determine whether Accumulated Depreciation: 1) Accruals are properly calculated and recorded based on Rule 25-30.140 – Depreciation, F.A.C., 2) Retirements are recorded when an asset was replaced, and 3) Adjustments required in the Utility's last rate proceeding were recorded to its books and records.

Procedures: We could not reconcile the beginning balances for water and wastewater Accumulated Depreciation established in Docket No. 010869-WS, with the Seller's books and records because the Seller did not record any of the adjustments as required in Order No. PSC-02-1168-PAA-WS. We recalculated depreciation accruals for all water and wastewater accounts as of December 31, 2014, using the audited UPIS balance and the depreciation rates for UPIS established by Rule 25-30.140, F.A.C. Our recommended adjustments to water and wastewater Accumulated Depreciation balances are discussed in Finding 1.

Contributions in Aid of Construction

Objectives: The objectives were to determine whether Contributions in Aid of Construction (CIAC): 1) Consist of cash or property contributions that exist and are owned by the Utility, 2) Additions are recorded using Commission approved tariffs, 3) Retirements are recorded when a contributed asset was replaced, and 3) Adjustments required in the Utility's last rate proceeding were recorded to its books and records.

Procedures: We could not reconcile the beginning balances for water and wastewater CIAC established in Docket No. 010869-WS, with the Seller's books and records because the Seller did not record any of the adjustments as required in Order No. PSC-02-1168-PAA-WS. We scanned the seller's records and inquired about cash and property contributions since the last rate proceeding. We reconciled and recalculated CIAC additions to the service availability tariff for each Utility system. We determined the CIAC transfer balances for each system, as of December 31, 2014. Our recommended adjustments to water and wastewater CIAC are discussed in Finding 3.

Accumulated Amortization of CIAC

Objectives: The objectives were to determine whether Accumulated Amortization of CIAC: 1) Accruals are properly calculated and recorded based on Rule 25-30.140 – Depreciation, F.A.C., 2) Retirements are recorded when a contributed asset was replaced, and 3) Adjustments required in the Utility's last rate proceeding were recorded to its books and records.

Procedures: We could not reconcile the beginning balances for water and wastewater Accumulated Amortization of CIAC established in Docket No. 010869-WS, with the Seller's books and records because the Seller did not record any of the adjustments as required in Order No. PSC-02-1168-PAA-WS. We recalculated amortization accruals for all water and wastewater CIAC accounts since the last rate case through December 31, 2014, using audited CIAC balances and the composite amortization rate for CIAC as required by Rule 25-30.140, F.A.C. Our recommended adjustments to water and wastewater Accumulated Amortization of CIAC are discussed in Finding 3.

Acquisition Adjustment

Objectives: The objectives were to determine the acquisition adjustment, if any, based on audit staff's net book value pursuant to Rule 25-30.0371(1), F.A.C.

Procedures: We determined the Net Book Value for this utility, as of December 31, 2014, to be \$85,090. The purchase price is \$107,000. Pursuant to Rule 25-30.0371(1), F.A.C., an acquisition adjustment of \$21,910 exists. The Utility did not request an acquisition adjustment in its filing, so we did not include it in our exhibit.

Other

Rates and Charges

Objective: The objective was to determine whether the Utility is charging monthly service rates authorized by Commission tariffs.

Procedures: We obtained and tested the Buyer's billing register for May 2015. We recalculated a sample of customers' bills using the approved tariffs. No exceptions were noted.

Customer Deposits

Objective: The objective was to determine the transfer balance for customer deposits for each utility system.

Procedures: We inquired and verified the amount of customer deposits that were transferred from the seller to the buyer at closing. Our recommended adjustments to Customer Deposits are discussed in Finding 4.

Audit Findings

Finding 1: Utility Plant in Service and Accumulated Depreciation

Audit Analysis: The Utility's general ledger reflects Utility Plant in Service (UPIS) balances of \$111,551 for water and \$207,010 for wastewater, as of December 31, 2014.

We reviewed the Utility's records since the last rate case and determined that Utility did not record the adjustments required in Order No. PSC-02-1168-PAA-WS. The adjustments increased water and wastewater UPIS by \$47,780 and \$273,748, respectively. The Order established UPIS balances of \$135,647 for water and \$465,010 for wastewater, as of December 31, 2000.

The Utility recorded UPIS additions of \$21,684 (\$111,551-\$89,867) for water and \$15,748 (\$207,010-\$191,262) for wastewater from 2001 through 2014. The Utility provided supporting documents for UPIS additions of \$6,689 (\$142,336-\$135,647) for water and \$17,092 (\$482,102-\$465,010) for wastewater for the period audited.

Below are our adjustments to the water and wastewater UPIS additions which are based on the information provided. Table 1-1 that follows displays the UPIS sub-account balances with our adjustments.

Year	Water UPIS			Wastewater UPIS		
	Utility	Adjustment	Audit	Utility	Adjustment	Audit
Beg Bal	\$89,867	\$45,780	\$135,647	\$191,262	\$273,748	\$465,010
2001	\$1,303	(\$1,303)	\$0	\$0	\$0	\$0
2002	\$253	(\$253)	\$0	\$950	(\$950)	\$0
2003	\$10,925	(\$10,003)	\$922	\$10,625	(\$2,908)	\$7,717
2004	\$1,100	\$1,429	\$2,529	\$0	\$1,520	\$1,520
2005	\$1,650	(\$956)	\$694	\$0	\$1,850	\$1,850
2006	\$2,880	(\$1,530)	\$1,350	\$0	\$157	\$157
2007	\$402	\$0	\$402	\$0	\$0	\$0
2008	\$0	\$0	\$0	\$4,173	\$1,675	\$5,848
2009	\$3,171	(\$2,378)	\$793	\$0	\$0	\$0
2010	\$0	\$0	\$0	\$0	\$0	\$0
2011	\$0	\$0	\$0	\$0	\$0	\$0
2012	\$0	\$0	\$0	\$0	\$0	\$0
2013	\$0	\$0	\$0	\$0	\$0	\$0
2014	\$0	\$0	\$0	\$0	\$0	\$0
Total	\$111,551	\$30,786	\$142,336	\$207,010	\$275,092	\$482,102

(Small differences are due to rounding.)

Order No. PSC-02-1168-PAA-WS established Accumulated Depreciation balances of \$42,759 for water and \$192,106 for wastewater as of December 31, 2000. We reviewed the Utility's records since the last rate case and determined that the Utility did not record the adjustments from the order.

We recalculated depreciation accruals for all water and wastewater accounts since the last rate case through December 31, 2014 using our audited UPIS balances and the depreciation rates established by Rule 25-30.140, F.A.C. Below are our adjustments to accumulated depreciation for water and wastewater based on our recalculation. Table 1-2 that follows displays the Accumulated Depreciation sub-account balances with our adjustments.

Accumulated Depreciation	Water			
	Year	Utility	Adjustment	Audit
Beginning Balance		(\$25,212)	(\$17,547)	(\$42,759)
2001-2014		(\$55,056)	\$3,318	(\$51,738)
Total		(\$80,268)	(\$14,229)	(\$94,497)

Accumulated Depreciation	Wastewater			
	Year	Utility	Adjustment	Audit
Beginning Balance		(\$63,265)	(\$128,841)	(\$192,106)
2001-2014		(\$93,629)	(\$84,575)	(\$178,204)
Total		(\$156,894)	(\$213,416)	(\$370,310)

Effect on the General Ledger: UPIS for water should be increased by \$30,786 and wastewater should be increased by \$275,092. Accumulated Depreciation should be increased by \$14,229 for water and \$213,416 for wastewater.

Effect on the Filing: The water and wastewater UPIS balances are \$142,336 and \$482,102 and Accumulated Depreciation balances are \$94,497 and \$370,310, as of December 31, 2014.

Table 1-1

Water UPIS as of December 31, 2014				
Acct.	Account Description	Per Utility	Adjustment	Per Audit
301.00	Organization	\$950	(\$6)	\$944
304.00	Structures & Improvements	\$4,900	\$1,766	\$6,666
305.00	Collecting & Impounding Reservoirs	\$0	\$0	\$0
307.00	Wells & Springs	\$8,100	(\$3,966)	\$4,134
309.00	Supply Mains	\$0	\$3,760	\$3,760
311.00	Pumping Equipment (SubPump)	\$0	\$7,165	\$7,165
311.00	Pumping Equipment (Electric)	\$14,200	(\$10,974)	\$3,226
320.00	Water Treatment Equipment	\$5,976	(\$5,295)	\$681
330.00	Distribution Reservoirs & Standpipes	\$0	\$27,475	\$27,475
331.00	Transmission & Distribution Mains	\$46,378	\$16,656	\$63,034
333.00	Services	\$8,622	\$10,449	\$19,071
334.00	Meters & Meter Installations	\$11,143	(\$4,962)	\$6,181
335.00	Hydrants	\$0	\$0	\$0
340.00	Office Furniture & Equipment	\$183	(\$183)	\$0
341.00	Transportation Equipment	\$0	\$0	\$0
347.00	Misc. Equipment's	\$474	(\$474)	\$0
348.00	Other Intangible Plant	\$10,625	(\$10,625)	\$0
Total		\$111,551	\$30,786	\$142,336

Wastewater UPIS as of December 31, 2014				
Acct.	Account Description	Per Utility	Adjustment	Per Audit
351.00	Organization	\$950	\$195	\$1,145
354.00	Structures & Improvements	\$950	\$16,469	\$17,419
360.00	Collection Sewers - Force	\$37,363	(\$27,983)	\$9,380
361.00	Collection Sewers - Gravity	\$80,831	\$113,542	\$194,373
362.00	Special Collection Structures	\$0	\$53,404	\$53,404
363.00	Services to Customers	\$14,118	\$11,783	\$25,901
364.00	Flow Measuring Devices	\$0	\$0	\$0
370.00	Receiving Wells	\$0	\$0	\$0
371.00	Pumping Equipment	\$0	\$0	\$0
380.00	Treatment and Disposal - Equipment	\$62,173	\$70,748	\$132,921
381.00	Plant Sewers	\$0	\$0	\$0
382.00	Outfall Sewer Lines	\$0	\$3,770	\$3,770
389.00	Other Plant	\$0	\$43,789	\$43,789
390.00	Office Furniture & Equipment	\$0	\$0	\$0
391.00	Transportation Equipment	\$0	\$0	\$0
398.00	Other Tangible Plant	\$10,625	(\$10,625)	\$0
Total		\$207,010	\$275,092	\$482,102

(Small differences are due to rounding.)

Table 1-2

Water Accumulated Depreciation as of December 31, 2014				
Acct.	Account Description	Per Utility	Adjustment	Per Audit
301.00	Organization	\$0	(\$566)	(\$566)
304.00	Structures & Improvements	\$0	(\$5,422)	(\$5,422)
305.00	Collecting & Impounding Reservoirs	\$0	\$0	\$0
307.00	Wells & Springs	\$0	(\$2,912)	(\$2,912)
309.00	Supply Mains	\$0	(\$2,822)	(\$2,822)
311.00	Pumping Equipment (SubPump)	\$0	(\$3,210)	(\$3,210)
311.00	Pumping Equipment (Electric)	\$0	(\$1,319)	(\$1,319)
320.00	Water Treatment Equipment	\$0	(\$681)	(\$681)
330.00	Distribution Reservoirs & Standpipes	\$0	(\$19,981)	(\$19,981)
331.00	Transmission & Distribution Mains	\$0	(\$39,801)	(\$39,801)
333.00	Services	\$0	(\$13,082)	(\$13,082)
334.00	Meters & Meter Installations	\$0	(\$4,700)	(\$4,700)
335.00	Hydrants	\$0	\$0	\$0
340.00	Office Furniture & Equipment	\$0	\$0	\$0
341.00	Transportation Equipment	\$0	\$0	\$0
347.00	Misc. Equipment's	\$0	\$0	\$0
348.00	Other Intangible Plant	\$0	\$0	\$0
	Per General Ledger	(\$80,268)	\$80,268	\$0
Total		(\$80,268)	(\$14,229)	(\$94,497)

Wastewater Accumulated Depreciation as of December 31, 2014				
Acct.	Account Description	Per Utility	Adjustment	Per Audit
351.00	Organization	\$0	(\$687)	(\$687)
354.00	Structures & Improvements	\$0	(\$13,798)	(\$13,798)
360.00	Collection Sewers - Force	\$0	(\$8,335)	(\$8,335)
361.00	Collection Sewers - Gravity	\$0	(\$115,380)	(\$115,380)
362.00	Special Collection Structures	\$0	(\$34,626)	(\$34,626)
363.00	Services to Customers	\$0	(\$17,768)	(\$17,768)
364.00	Flow Measuring Devices	\$0	\$0	\$0
370.00	Receiving Wells	\$0	\$0	\$0
371.00	Pumping Equipment	\$0	\$0	\$0
380.00	Treatment and Disposal - Equipment	\$0	(\$132,913)	(\$132,913)
381.00	Plant Sewers	\$0	\$0	\$0
382.00	Outfall Sewer Lines	\$0	(\$3,014)	(\$3,014)
389.00	Other Plant	\$0	(\$43,789)	(\$43,789)
390.00	Office Furniture & Equipment	\$0	\$0	\$0
391.00	Transportation Equipment	\$0	\$0	\$0
398.00	Other Tangible Plant	\$0	\$0	\$0
	Per General Ledger	(\$156,894)	\$156,894	\$0
Total		(\$156,894)	(\$213,416)	(\$370,310)

(Small differences are due to rounding.)

Finding 2: Land and Land Rights

Audit Analysis: The Utility's general ledger reflects Land balances of \$35,000 for water and \$50,000 for wastewater as of December 31, 2014.

The land balances of \$35,000 for the water plant and \$50,000 for the wastewater were removed from the Utility's rate base in Docket No. 010869-WS because the Utility did not own the land where the water and wastewater plants are located. Order No. PSC-02-1168-PPA-WS included as a recurring expense that cost associated with leasing the land where the water and wastewater plants are located.

The original 99 year land lease between East Marion Water and Distribution Trust and East Marion Sanitary System Trust with the Seller was dated May 4, 1995. The lease was assigned by the Seller to East Marion Utilities, LLC. by means of the "Agreement for Purchase and Sale of Utility System Assets".

Effect on the General Ledger: Land for water should be reduced by \$35,000 and wastewater should be reduced by \$50,000.

Effect on the Filing: The water and wastewater Land balances are \$0, each, as of December 31, 2014.

Finding 3: Contributions-in-Aid-of-Construction and Accumulated Amortization of CIAC

Audit Analysis: The Utility’s general ledger reflects Contributions in Aid of Construction (CIAC) balances of \$13,865 for water and \$26,600 for wastewater, as of December 31, 2014.

Order No. PSC-02-1168-PAA-WS established CIAC balances of \$14,430 for water and \$27,885 for wastewater, as of December 31, 2000. We reviewed the Utility’s records since the last rate case and determined that the Utility did not record the adjustments to CIAC from the order.

We scanned the seller’s records and inquired about cash and property contributions since the last rate case. We traced additions to CIAC to the specific system’s service availability tariffs approved in Order No. PSC-02-1168-PAA-WS. We determined the CIAC transfer balance for each system, as of December 31, 2014

The Utility recorded CIAC additions of \$25,270 for water and \$49,715 for wastewater from 2001 through 2014, which were verified above. The only adjustments needed to water CIAC and wastewater CIAC are the prior order adjustments reflected below.

Contribution-In-Aid-of-Construction		Water	
Year	Utility	Adjustment	Audit
Beginning Balance	(\$13,865)	(\$565)	(\$14,430)
2001-2014	(\$25,270)	\$0	(\$25,270)
12/31/2014	(\$39,135)	(\$565)	(\$39,700)

Contribution-In-Aid-of-Construction		Wastewater	
Year	Utility	Adjustment	Audit
Beginning Balance	(\$26,600)	(\$1,285)	(\$27,885)
2001-2014	(\$49,715)	\$0	(\$49,715)
12/31/2014	(\$76,315)	(\$1,285)	(\$77,600)

Order No. PSC-02-1168-PAA-WS, established Accumulated Amortization of CIAC balances of \$1,675 for water and \$4,239, as of December 31, 2000. We reviewed the Utility’s records since the last rate case and determined that the Utility did not record the adjustments from the order.

We recalculated amortization accruals for all water and wastewater CIAC accounts since the last rate case through December 31, 2014, using our audited balances and the composite amortization rates for CIAC as required by Rule 25-30.140, F.A.C. Below are our adjustments to water and wastewater Accumulated Amortization of CIAC based on our recalculation.

Accumulated Amortization of CIAC		Water	
Year	Utility	Adjustment	Audit
Beginning Balance	\$1,654	\$21	\$1,675
2001-2014	\$23,663	(\$8,801)	\$14,862
12/31/2014	\$25,317	(\$8,780)	\$16,537

Accumulated Amortization of CIAC		Wastewater	
Year	Utility	Adjustment	Audit
Beginning Balance	\$2,405	\$1,834	\$4,239
2001-2014	\$24,259	(\$2,276)	\$21,983
12/31/2014	\$26,664	(\$442)	\$26,222

Effect on the General Ledger: CIAC should be increased by \$565 for water and \$1,285 for wastewater plant, while the Accumulated Amortization of CIAC should be reduced to \$8,780 for water and \$442 for wastewater plant.

Effect on the Filing: The water and wastewater CIAC balances are \$39,700 and \$77,600 and Accumulated Amortization of CIAC balances are \$16,537 and \$26,222, as of December 31, 2014.

Finding 4: Customer Deposits

Audit Analysis: The general ledger reflects a balance of \$1,314 for Customer Deposits, as of December 31, 2014.

We inquired about the amount of Customer Deposits that were being transferred from the seller to the buyer. According to a schedule provided to the audit staff, by the buyer, the balance for Customer Deposits was \$4,110, as of December 31, 2014.

	<u>Per Utility</u>	<u>Adjustment</u>	<u>Per Audit</u>
Customer Deposits	\$1,314	\$2,796	\$4,110

Effect on the General Ledger: Customer Deposits should be increased by \$2,796.

Effect on the Filing: The Customer Deposit balance is \$4,110, as of December 31, 2014.

Exhibits

Exhibit 1: Net Book Value

**East Marion Utilities, LLC.
Net Book Value
As of December 31, 2014**

Water	Utility	Adjustment	Audit
Utility Plant in Service	\$111,551	\$30,786	\$142,336
Land & Land Rights	\$35,000	(\$35,000)	\$0
Contributions in Aid of Construction	(\$39,135)	(\$565)	(\$39,700)
Accumulated Depreciation	(\$80,268)	(\$14,229)	(\$94,497)
Accumulated Amortization of CIAC	\$25,317	(\$8,780)	\$16,537
Acquisition Adjustment	\$0	\$0	\$0
Water Net Book Value	\$52,465	(\$27,788)	\$24,676

Wastewater	Utility	Adjustment	Audit
Utility Plant in Service	\$207,010	\$275,092	\$482,102
Land & Land Rights	\$50,000	(\$50,000)	\$0
Contributions in Aid of Construction	(\$76,315)	(\$1,285)	(\$77,600)
Accumulated Depreciation	(\$156,894)	(\$213,416)	(\$370,310)
Accumulated Amortization of CIAC	\$26,664	(\$442)	\$26,222
Acquisition Adjustment	\$0	\$0	\$0
Wastewater Net Book Value	\$50,465	\$9,949	\$60,414

Total Net Book Value	\$102,930	(\$17,839)	\$85,090
-----------------------------	------------------	-------------------	-----------------

(Small differences are due to rounding.)