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Public Service Commission

April 10, 2013

Pinecrest Utilities, LLC
Attn: Mike Smallridge
P.O. Box 1798
Eaton Park, FL 33840-1798

VIA ELECTRONIC MAIL

Re: Staff-Assisted Rate Case for Pinecrest Utilities, LLC in Polk County, Docket No. 120269-WU

Dear Mr. Smallridge:

Enclosed are two copies of the staff report. Please ensure that a copy of the completed Application for Staff Assistance and the staff report are available for review, pursuant to Rule 25-22.0407 (9)(b), Florida Administrative Code, by all interested persons at the following location:

Bartow Public Library
2150 S. Broadway Ave.
Bartow, FL 33830

Should you have any questions about any of the matters contained herein, please do not hesitate to contact me at (850) 413-6994.

Sincerely,

A handwritten signature in black ink, appearing to read "Sonica C. Bruce".

Sonica C. Bruce
Regulatory Analyst IV

Enclosures

SB

cc: Division of Economics (Daniel, Bruce, Hudson)
Division of Accounting & Finance (Prestwood, Mouring, Barrett)
Division of Engineering (Vickery, Lewis, Ellis, McRoy)
Office of General Counsel (Teitzman, Murphy)
Office of Commission Clerk (Docket No. 120269-WU)

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Public Service Commission

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

DATE: April 1, 2013

TO: Patti Daniel, Bureau Chief, Bureau of Economic Impact and Rate Design

FROM: Sonica Bruce, Regulatory Analyst IV
Phillip Ellis, Engineering Specialist III
Michael Barrett, Regulatory Analyst IV

RE: Docket No. 120269-WU – Application for staff-assisted rate case in Polk County by Pinecrest Utilities, LLC.

– STAFF REPORT –

This Staff Report is preliminary in nature. The Commission staff's final recommendation will not be filed until after the customer meeting.

DOCUMENT NUMBER-DATE

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Case Background

Pinecrest Utilities, LLC. (Pinecrest or Utility) is a Class C water utility serving approximately 145 customers in Polk County. The Utility is located in the Southern Water Use Caution Area of the Southwest Florida Water Management District (SWFWMD) or District. However, there are no water use restrictions for the Utility because annual withdrawals are less than 100,000 gallons per day. The Utility's 2012 Annual Report lists annual revenues of \$54,594 and total operating expenses were \$54,645, resulting in a net loss of \$51.

The Utility was constructed in 1987. In 1997, Pinecrest was granted Certificate No. 588-W when Polk County turned over jurisdiction of privately-owned water and wastewater utilities to the Commission.¹ Pinecrest's subsequent certification actions include a name change in 1997,² a transfer of majority organizational control in 2002,³ and a quick-take territory amendment in 2003.⁴ Rate base was last established by the Commission for rate making purposes in the Utility's 2010 staff-assisted rate case.⁵ On September 18, 2012, the Commission approved the transfer of Certificate No. 588-W from Pinecrest Ranches, Inc. to Pinecrest Utilities, LLC, and established rate base for transfer purposes.⁶ On October 25, 2012, the Utility filed an application for a SARC and paid the appropriate filing fee on December 19, 2012.

This Staff Report is a **preliminary** analysis of the Utility prepared by the Florida Public Service Commission (Commission) staff to give Utility customers and the Utility an advanced look at what staff may be proposing. The final recommendation to the Commission (currently scheduled to be filed June 6, 2013, for the June 18, 2013 Agenda Conference) will be revised as necessary using updated information and results of customer quality of service or other relevant comments received at the customer meeting.

The Commission has jurisdiction in this case pursuant to Sections 367.011, 367.0814, 367.101, and 367.121, Florida Statutes (F.S.).

¹ See Order No. PSC-97-0367-FOF-WU, issued April 2, 1997, in Docket No. 961253-WU, In re: Application for grandfather certificate to provide water service in Polk County by Pinecrest Ranches.

² See Order No. PSC-97-1087-FOF-WU, issued September 17, 1997, in Docket No. 970635-WU, In re: Application for name change on Certificate No. 588-W in Polk County from Pinecrest Ranches to Pinecrest Utilities, Inc.

³ See Order No. PSC-02-0893-FOF-WU, issued July 5, 2002, in Docket No. 011651-WU, In re: Application for transfer of majority organizational control of Pinecrest Ranches, Inc., holder of Certificate No. 588-W in Polk County, from James O. Vaughn and Margaret S. Hankin to S. Norman Duncan and Richard S. Little.

⁴ See Order No. PSC-03-0318-FOF-WU, issued March 6, 2003, in Docket No. 020823-WU, In re: Application for quick-take amendment of Certificate No. 588-W in Polk County by Pinecrest Ranches, Inc.

⁵ See Order No. PSC-10-0681-PAA-WU, issued November 15, 2010, in Docket No. 090414-WU, In re: Application for staff-assisted rate case in Polk County by Pinecrest Ranches, Inc.

⁶ See Order No. PSC-12-0475-PAA-WU, issued September 18, 2012, in Docket No. 110311-WU, In re: Application for transfer of Certificate No. 588-W from Pinecrest Ranches, Inc., in Polk County, to Pinecrest Utilities, LLC.

Discussion of Issues

Issue 1: Is the quality of service provided by Pinecrest satisfactory?

Recommendation: The staff recommendation regarding customer satisfaction and overall quality of service will not be finalized until after the April 25, 2013 customer meeting. (Ellis, McRoy)

Staff Analysis: Pursuant to Rule 25-30.433(1), Florida Administrative Code (F.A.C.), the Commission determines the overall quality of service a utility provides by evaluating the quality of it's product, the operational condition of it's plant and facilities, and it's attempt to address customer satisfaction. The Utility's compliance with the Polk County Health Department (PCHD) regulations and customer comments or complaints received by the Commission are also reviewed.

Pinecrest's water treatment plant (WTP) operating permit was renewed by the Southwest Florida Water Management District (SWFWMD) on November 12, 2010. It will expire on January 22, 2018. On March 13, 2012, PCHD conducted a Sanitary Survey Report for the WTP. Two deficiencies were noted in the report, a well seal leak and a raw water tap leak. The Utility's response to PCHD on May 1, 2012, indicated that the well seal leak was fixed and raw water tap was replaced.

A review of the customers' complaints over the last three years indicates that the Utility has resolved all of the complaints in a timely manner. There were five complaints filed with the Commission's Consumer Activity Tracking System (CATS) during the past three years with one improper billing complaint filed on February 7, 2013, that is still open. The staff recommendation regarding customer satisfaction and the overall quality of service will not be finalized until after the April 24, 2013, customer meeting.

Issue 2: What are the used and useful percentages of the water treatment plant and the distribution system?

Recommendation: The WTP and the distribution system should be considered 100 percent used and useful (U&U). (Ellis, McRoy)

Staff Analysis: Pinecrest has two wells rated at 70 and 200 gallons per minute, which are used to provide potable water. Raw water is treated with liquid chlorine and an injection of polyphosphate solution for iron sequestration, and is then pumped into the water distribution system. In addition, a third well is available for fire protection using a separate distribution system. The Utility provides service to approximately 145 residential customers. The distribution system is designed to serve approximately 157 customers.

In the Utility's last rate case,⁷ both the WTP and distribution system were found to be 100 percent U&U. The service area has had no growth in the past five years and there are no plans for expansion; therefore, pursuant to Rule 25-30.4325(4), F.A.C., staff recommends that the WTP and distribution system both be considered 100 percent U&U.

⁷ See Order No. PSC-10-0681-PAA-WU, issued November 15, 2010, in Docket No. 090414-WU, In re: Application for staff-assisted rate case in Polk County by Pinecrest Ranches, Inc.

Issue 3: What is the appropriate average test year rate base for the Utility?

Recommendation: The appropriate average test year rate base for the Utility is \$82,846. (Barrett)

Staff Analysis: The appropriate components of the Utility's rate base include utility plant in service, accumulated depreciation, contribution-in-aid-of-construction (CIAC), amortization of CIAC and working capital. Pinecrest's rate base was last established in its 2011 transfer case by Order No. PSC-12-0475-PAA-WU.⁸ Staff selected the test year ended September 30, 2012, for the instant rate case. A summary of each component and the recommended adjustments follows:

Utility Plant in Service (UPIS): The Utility recorded a UPIS balance of \$214,658. Staff has increased UPIS by \$1,589 to reflect the allocation of a common office that handles the billing and administrative functions for Pinecrest. Staff decreased UPIS by \$8,000 to reflect the retirement of a pick-up truck that was totaled after the test year. Staff also increased plant to reflect pro forma additions that occurred outside of the test year. Staff's net adjustment to UPIS is a decrease of \$4,549. Therefore, staff recommends a UPIS balance of \$210,109.

Non-Used and Useful Plant: As discussed in Issue 2, Pinecrest's water treatment plant and distribution system should be considered 100 percent used and useful. Therefore, a used and useful adjustment is not necessary.

Contributions In Aid of Construction (CIAC): Pinecrest recorded a balance for CIAC of \$100,351. Staff has verified that CIAC was properly recorded in compliance with Commission rules and the National Association of Regulatory Utility Commissioners' Uniform System of Accounts (NARUC USOA). Staff recommends a CIAC balance of \$100,351.

Accumulated Depreciation: Pinecrest recorded a balance for accumulated depreciation of \$107,209. Staff has calculated accumulated depreciation using the prescribed rates set forth in Rule 25-30.140, F.A.C., and determined that accumulated depreciation should be increased by \$6,054. In addition, staff has decreased accumulated depreciation by \$834 to reflect the retirement of the totaled pick-up truck, and further decreased accumulated depreciation by \$2,780 to reflect the retirements associated with the pro forma plant replacements. Staff also increased accumulated depreciation by \$244 to reflect the appropriate amount for the allocated common office that handles the billing and administrative functions for Pinecrest. Staff's net adjustment to accumulated depreciation is an increase of \$2,684. Staff recommends an accumulated depreciation balance of \$109,893.

Amortization of CIAC: Pinecrest recorded a balance for amortization of CIAC of \$68,020. Staff has increased amortization of CIAC by \$2,104 to include amortization of CIAC not booked by the Utility during the test year. Staff recommends a CIAC balance of \$70,124.

Working Capital Allowance: Pinecrest's working capital balance for the test year was \$2,436. Working capital is defined as the investor-supplied funds that are necessary to meet operating

⁸ See Order No. PSC-12-0475-PAA-WU, issued September 18, 2012, in Docket No. 110311-WU, In re: Application for transfer of Certificate No. 588-W from Pinecrest Ranches, Inc. in Polk County, to Pinecrest Utilities, LLC.

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Date: April 1, 2013

expenses or going-concern requirements of the Utility. Consistent with Rule 25-30.433(2), F.A.C., staff used the one-eighth of the operation and maintenance (O&M) expense formula approach for calculating the working capital allowance. Applying this formula, staff recommends a working capital allowance of \$6,357 (based on O&M expense of \$50,858/8). Staff has increased the working capital allowance by \$3,922.

Rate Base Summary: Based on the foregoing, staff recommends that the appropriate average test year rate base is \$82,846. Rate base is shown on Schedule No. 1-A. The related adjustments are shown on Schedule No. 1-B.

Issue 4: What are the appropriate return of equity and overall rate of return for this Utility?

Recommendation: The appropriate return on equity (ROE) is 11.16 percent with a range of 10.16 percent to 12.16 percent. The appropriate overall rate of return is 6.27 percent. (Barrett)

Staff Analysis: The Utility's capital structure consists of long-term debt of \$85,092 at 6.27 percent, \$384 of customer deposits, and negative common equity. To be consistent with prior Commission policy, staff has set the Utility's common equity balance to \$0.⁹ The appropriate ROE is 11.16 percent using the Commission-approved leverage formula currently in effect.¹⁰ The Utility's capital structure has been reconciled with staff's recommended rate base. Staff recommends an ROE of 11.16 percent, with a range of 10.16 percent to 12.16 percent, and an overall rate of return of 6.27 percent. The ROE and overall rate of return are shown on Schedule No. 2.

⁹ See Order No. PSC-08-0652-PAA-WS, issued October 6, 2008, in Docket No. 070722-WS, In re: Application for staff-assisted rate case in Palm Beach County by W.P. Utilities, Inc.

¹⁰ See Order Nos. PSC-12-0339-PAA-WS, issued June 28, 2012, and PSC-12-0372-CO-WS, issued July 20, 2012, in Docket No. 120006-WS, In re: Water and Wastewater Industry Annual Reestablishment of Authorized Range of Return on Common Equity for Water and Wastewater Utilities Pursuant to Section 367.081(4)(f), Florida Statutes.

Issue 5: What is the appropriate amount of test year revenues?

Recommendation: The appropriate test year revenues for the Pinecrest water system are \$59,303. (Bruce)

Staff Analysis: Pinecrest recorded total test year revenues of \$12,945, including water service revenues of \$12,107 and \$838 of miscellaneous revenues. The Utility's test year is October 2011 to September 2012. The Utility did not record any revenues in its general ledger for January 2012 through September 2012.

Based on staff's review of the Utility's billing determinants and the rates that were in effect during the test year, staff recommends adjustments to the test year service revenues. The Utility incorrectly billed the base facility and gallonage charge in effect from October 2011 to February 2012 of the test year, resulting in an underbilling. In March 2012, the Utility corrected its billing to reflect the Commission-approved tariff rates. The rates also changed in September 2012 to implement a Phase II rate increase. When there is a rate change, service revenues are annualized to reflect the change. Subsequent to the test year, in October 2012, the Utility implemented a price index rate adjustment. Staff's test year revenues reflect the rates associated with the Phase II rate increase for the test year. Based on staff's review of the Utility's billing determinants and rate change in the test year, staff determined service revenues should be increased by \$43,398 to reflect total test year service revenues of \$55,505.

In addition, staff made adjustments to test year miscellaneous revenues. As mentioned earlier, Pinecrest recorded \$838 of miscellaneous revenues during the test year. However, according to the audit, miscellaneous revenue should be increased by \$2,960 to reflect unrecorded miscellaneous revenues. The test year miscellaneous revenues were \$3,798.

Based on the above adjustments, staff recommends total test year revenues of \$59,303 for the water system. Test year revenues should be increased by \$46,358 (\$43,398 + \$2,960). Test year revenues are shown on Schedule 3-A.

Issue 6: What is the appropriate amount of operating expenses?

Recommendation: The appropriate amount of operating expense for Pinecrest is \$58,351. (Barrett)

Staff Analysis: Pinecrest recorded operating expense of \$48,246 for the test year ended September 30, 2012. The test year O&M expenses have been reviewed, and invoices, canceled checks, and other supporting documentation have been examined. Staff has made several adjustments to the Utility's operating expenses as summarized below:

Salaries and Wages - Employees (601) – Pinecrest recorded \$0 for employee salaries expense in this account. Staff has made an adjustment to this account to include the appropriate allocation of a maintenance employee's salary. Staff recommends increasing this account by \$3,622. Staff recommends employee salaries expense of \$3,622.

Salaries and Wages - Officers (603) – Pinecrest recorded \$7,120 for officers salaries expense in this account. Staff has made adjustments to officers salaries to remove \$230 related to loan credits recorded in this account and to remove \$150 for out of period expenses. Staff also increased this account by \$908 to reflect the appropriate allocation of the Utility president's salary, resulting in a net increase of \$988. Staff recommends officers salaries expense of \$8,108.

Employee Pensions and Benefits (604) – Pinecrest recorded \$0 for employee pensions and benefits expense in this account. Staff has made an adjustment to this account to include the appropriate allocation of a maintenance employee's health insurance. Staff recommends increasing this account by \$977. Staff recommends employee pensions and benefits expense of \$977.

Purchased Power (615) – Pinecrest recorded \$2,668 for purchased power expense in this account. Staff has made two adjustments to purchased power: 1) to remove \$141 of late fees and penalties and reclassify them to non-utility expense; and 2) to add \$187 to include the appropriate allocation of purchased power expense for the common office that handles the billing and administrative functions for Pinecrest. The result of these adjustments is a net increase of \$46. Staff recommends purchased power expense of \$2,715.

Materials and Supplies (620) – The Utility recorded \$2,756 for material and supplies in this account. Staff has reclassified a \$90 credit from revenue to this account to reflect the reimbursement for cutting a pipe. Staff has also removed undocumented expenses totaling \$1,794. Staff's net adjustment to this account is a decrease of \$1,884. Staff recommends materials and supplies expense of \$871.

Contractual Services – Billing (630) – Pinecrest recorded \$290 in this account for contractual services – billing. Staff has decreased this account by \$290 to reclassify meter reading expenses from contractual services – billing to contractual services - other. Staff has increased this account by \$2,670 to include the appropriate allocation of expense for the common office that handles the billing and administrative functions for Pinecrest, resulting in a net increase of \$2,380. Staff recommends contractual services – professional expense of \$2,670.

Contractual Services – Professional (631) – Pinecrest recorded \$4,507 in this account for contractual services – professional. Staff has increased this account by \$2,279 to include the appropriate allocation of expense for a maintenance employee that performs work for Pinecrest. Staff recommends contractual services – professional expense of \$6,785.

Contractual Services – Testing (635) – The Utility recorded \$4,593 in this account for testing expense. Staff has decreased this account by \$192 to remove the amount of testing expenses that were incorrectly allocated to Pinecrest. Staff recommends contractual services – testing expense of \$4,402.

Contractual Services – Other (636) – Pinecrest recorded \$12,458 in this account for contractual services – other. Staff has increased this account by \$2,117 to reflect the appropriate amount of meter reading expense. Staff has reduced this account by \$600 ($\$750 \times 4/5$) to normalize a tank inspection which cost \$750, and occurs every five years. Staff has also decreased this account by \$4,869 to reflect the appropriate amount of allocated expense for the common office that handles the billing and administrative functions for Pinecrest, resulting in a net decrease of \$3,352. Staff recommends contractual services – other expense of \$9,107.

Rents (640) – Pinecrest recorded rent expense of \$793. Staff has reclassified \$126 from this account to miscellaneous expense related to the rental of an air valve. Staff has increased this account by \$251 to include the appropriate allocation of rent expense for the common office that handles the billing and administrative functions for Pinecrest, resulting in a net increase of \$125. Staff recommends rent expense of \$918.

Transportation Expense (650) – Pinecrest recorded rent expense of \$1,077. Staff has increased this account by \$410 to remove an out of period journal entry credit to transportation expense. Staff has also increased this account to by \$197 to reflect the appropriate amount of allocated transportation expense for Pinecrest. Staff's net adjustment to this account is an increase of \$606. Staff recommends rent expense of \$1,684.

Insurance Expense (655) – Pinecrest recorded insurance expense of \$3,404. Staff has increased this account by \$322 to remove an out of period journal entry credit to insurance expense. Staff also increased this amount by \$792 to reflect the appropriate annual cost of insuring the plant. Staff has decreased this account by \$2,831 to reflect the appropriate allocation of insurance expense for the common office that handles the billing and administrative functions for Pinecrest, resulting in a net decrease of \$1,717. Staff recommends insurance expense of \$1,686.

Regulatory Commission Expense (665) – Pinecrest recorded \$0 for regulatory commission expense in this account. Regarding the current rate case, pursuant to Rule 25-22.0407, F.A.C., the Utility is required to mail notices of the customer meeting and notices of final rates to its customers. For these notices, staff has estimated \$135 for postage expense, \$103 for printing expense, and \$15 for envelopes, for a total noticing cost of \$253. The Utility paid a \$500 rate case filing fee. The total rate case expense including postage, notices, envelopes, and filing fee is \$753. Pursuant to Section 367.0816, F.S., rate case expense is amortized over a four-year period, which is \$188 per year ($\$753/4$). Staff's net adjustment to this account is an increase of \$188. Staff recommends regulatory commission expense of \$188.

Bad Debt Expense (670) – Pinecrest recorded bad debt expense of \$640. Staff has increased this account by \$267 to reflect a three-year average of bad debt expense. Consistent with prior Commission practice,¹¹ staff recommends utilizing a three-year historical average of bad debt expense as a reasonable estimation of future bad debt expense. Staff recommends bad debt expense of \$907.

Miscellaneous Expense (675) – Pinecrest recorded \$4,908 in this account for miscellaneous expense. Staff has increased this account by \$126 to reflect the reclassification of expenses related to the rental of an air valve. Staff has decreased miscellaneous expense to reclassify \$227 of late fees of \$82 and an undocumented journal entry of \$145 to non-utility expenses. Staff has increased this account by \$630 to reflect the appropriate allocation of miscellaneous expense for the common office that handles the billing and administrative functions for Pinecrest. The result of these adjustments is a net increase of \$529. Staff recommends miscellaneous expense of \$5,437.

Operation and Maintenance Expenses (O&M) Summary – Total adjustments to O&M expense result in an increase of \$4,863. Staff's recommended O&M expense is \$50,858. O&M expenses are shown on Schedule No. 3-A.

Depreciation Expense (of Related Amortization of CIAC) – The Utility recorded depreciation expense of \$0 during the test year. Staff has calculated depreciation expense using the prescribed rates set forth in Rule 25-30.140, F.A.C., and determined depreciation expense to be \$7,634. Pinecrest's amortization of CIAC is \$2,806. Therefore, staff recommends net depreciation expense of \$4,828.

Taxes Other Than Income (TOTI) – The Utility recorded \$2,251 in this account for TOTI. Staff has increased this account by \$423 to reflect the appropriate test year RAFs. Staff reduced this account by \$681 for property taxes on a piece of property that is non-utility related. Staff also increased this account by \$481 to reflect the appropriate allocation of payroll taxes for the common office that handles the billing and administrative functions for Pinecrest, resulting in a net increase of \$223. Staff recommends TOTI of \$2,474.

Income Tax – The Utility is a limited liability company and did not record income tax for the test year. As a limited liability company, Pinecrest pays no income tax expense. Therefore, staff has not made any adjustments to this account.

Operating Expenses Summary – The application of staff's recommended adjustments to Pinecrest's recorded test year operating expenses result in staff's recommended operating expenses of \$58,351. Operating expenses are shown on Schedule No. 3-A. The related adjustments are shown on Schedule No. 3-B.

¹¹ See Order No. PSC-12-0667-PAA-WS, issued December 26, 2012, in Docket No. 120037-WS, In re: Application for increase in water and wastewater rates in Lake County by Utilities, Inc. of Pennbrooke.

Issue 7: What is the appropriate revenue requirement?

Recommendation: The appropriate revenue requirement is \$63,546, resulting in an annual increase of \$4,243 (7.15 percent). (Barrett)

Staff Analysis: Pinecrest should be allowed an annual increase of \$4,243 (7.15 percent). This will allow the Utility the opportunity to recover its expenses and a 6.27 percent return on its investment. The calculations are as follows:

Table 7-1

<u>Water Revenue Requirement</u>	
Adjusted Rate Base	\$82,846
Rate of Return	x .0627
Return on Rate Base	\$ 5,194
Adjusted O&M expense	50,858
Depreciation expense (Net)	7,634
Amortization	(2,806)
Taxes Other Than Income	2,665
Income Taxes	0
Revenue Requirement	\$63,546
Less Test Year Revenues	59,303
Annual Increase	\$4,243
Percent Increase/(Decrease)	7.15%

Issue 8: Should the Utility's current water system rate structure be changed, and, if so, what is the appropriate adjustment?

Recommendation: No. Pinecrest's water system rate structure, which consists of a monthly base facility charge (BFC) and uniform gallonage charge rate structure, should remain unchanged. The water system's BFC allocation of 43 percent should remain unchanged. (Bruce)

Staff Analysis: Currently, the Utility's rate structure is BFC of \$14.45 and a gallonage charge of \$4.35. Staff performed a detailed analysis of the Utility's billing data in order to evaluate various BFC cost recovery percentages for the residential rate class. The goal of the evaluation was to select rate design parameters that: 1) allow the Utility to recover its revenue requirement; 2) equitably distribute cost recovery among the Utility's customers; and 3) implement, where appropriate, water conserving rate structures consistent with the Commission's goals and practices and memorandum of understanding (MOU) with the states's five Water Management Districts.

As mentioned earlier, the Utility is located in the SWFWMD. The Districts have requested, whenever possible, that an inclining block rate structure be implemented. However, based on staff's analysis of the billing data, the residential customers' overall average consumption is 4,057 gallons per month and the customer base is non-seasonal. A review of the Utility consumptive use permit (CUP) indicates that Pinecrest is well below its permitted gallons per day (GPD) allocation, and therefore, an inclining block rate structure, is not needed.

Due to the low revenue requirement increase of 7.15 percent, coupled with low average consumption, staff recommends that a continuation of the BFC and gallonage charge rate structure is appropriate in this case. This rate structure is considered conservation oriented because customers' bills increase as their consumption increases. In addition, staff recommends that rates be designed to produce 43 percent of the revenue requirement from the BFC. This rate structure minimizes the impact on customers using only non-discretionary water while increasing the gallonage charge for conservation purposes.

Based on the foregoing, staff recommends that Pinecrest's Pinecrest's water system rate structure, which consists of a monthly BFC and uniform gallonage charge rate structure, should remain unchanged. The water system's BFC allocation of 43 percent should remain unchanged.

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Issue 9: Are repression adjustments for Pinecrest's water system appropriate in this case, and, if so, what are the appropriate adjustments to make, what are the corresponding expense adjustments to make, and what are the final revenue requirements for the water system?

Recommendation: No, a repression adjustment is not appropriate in this case. (Bruce)

Staff Analysis: Based on staff's analysis, a repression adjustment is not warranted in this case due to the fact that there is not a significant amount of discretionary usage.

Issue 10: What are the appropriate rates for this Utility?

Recommendation: The appropriate monthly water rates are shown on Schedule No. 4. The recommended rates should be designed to produce service revenues of \$59,748. The Utility should file revised tariff sheets and a proposed customer notice to reflect the Commission-approved rates. The approved rates should be effective for service rendered on or after the stamped approval date on the tariff sheet, pursuant to Rule 25-30.475(1), F.A.C. In addition, the approved rates should not be implemented until staff has approved the proposed customer notice and the notice has been received by the customers. The Utility should provide proof of the date notice was given within 10 days of the date of the notice. (Bruce)

Staff Analysis: The recommended rates should be designed to produce the revenue requirement of \$63,546 for the water system excluding miscellaneous revenues. The water revenue requirement of \$63,546 should be adjusted to remove miscellaneous revenues of \$3,798. The resulting water rates should be designed to produce service revenues of \$59,748.

Based on the foregoing, the appropriate rates for monthly water service are shown on Schedule No. 4. The recommended rates should be designed to produce service revenues of \$59,748. The Utility should file revised tariff sheets and a proposed customer notice to reflect the Commission-approved rates. The approved rates should be effective for service rendered on or after the stamped approval date on the tariff sheet, pursuant to Rule 25-30.475(1), F.A.C. In addition, the approved rates should not be implemented until staff has approved the proposed customer notice and the notice has been received by the customers. The Utility should provide proof of the date notice was given within 10 days of the date of the notice.

Issue 11: What is the appropriate amount by which rates should be reduced four years after the established effective date to reflect the removal of the amortized rate case expense as required by Section 367.0816, F.S.

Recommendation: The water rates should be reduced as shown on Schedule No. 4 to remove rate case expense grossed-up for regulatory assessment fees and amortized over a four-year period. The decrease in rates should become effective immediately following the expiration of the four-year rate case expense recovery period, pursuant to Section 367.0816, F.S. Pinecrest should be required to file revised tariffs and a proposed customer notice setting forth the lower rates and the reason for the reduction no later than one month prior to the actual date of the required rate reduction. If the Utility files this reduction in conjunction with a price index or pass-through rate adjustment, separate data should be filed for the price index and/or pass-through increase or decrease and the reduction in the rates due to the amortized rate case expense. (Barrett, Bruce)

Staff Analysis: Section 367.0816, F.S., requires that the rates be reduced immediately following the expiration of the four-year period by the amount of the rate case expense previously included in rates. The reduction will reflect the removal of revenue associated with the amortization of rate case expense, the associated return in working capital, and the gross-up for RAFs. The total reduction is \$198.

The water rates should be reduced as shown on Schedule No. 4 to remove rate case expense grossed-up for regulatory assessment fees and amortized over a four-year period. The decrease in rates should become effective immediately following the expiration of the four-year rate case expense recovery period, pursuant to Section 367.0816, F.S. Pinecrest should be required to file revised tariffs and a proposed customer notice setting forth the lower rates and the reason for the reduction no later than one month prior to the actual date of the required rate reduction. If the Utility files this reduction in conjunction with a price index or pass-through rate adjustment, separate data should be filed for the price index and/or pass-through increase or decrease and the reduction in the rates due to the amortized rate case expense.

Issue 12: Should the recommended rates be approved for the Utility on a temporary basis, subject to refund with interest, in the event of a protest filed by a party other than the Utility?

Recommendation: Yes. Pursuant to Section 367.0814(7), F.S., the recommended rates should be approved for the Utility on a temporary basis, subject to refund with interest, in the event of a protest filed by a party other than the Utility. Pinecrest should file revised tariff sheets and a proposed customer notice to reflect the Commission-approved rates. The approved rates should be effective for service rendered on or after the stamped approval date on the tariff sheet, pursuant to Rule 25-30.475(1), F.A.C. In addition, the temporary rates should not be implemented until staff has approved the proposed notice, and the notice has been received by the customers. Prior to implementation of any temporary rates, the Utility should provide appropriate security. If the recommended rates are approved on a temporary basis, the rates collected by the Utility should be subject to the refund provisions discussed below in the staff analysis. In addition, after the increased rates are in effect, pursuant to Rule 25-30.360(6), F.A.C., the Utility should file reports with the Commission's Office of Commission Clerk no later than the 20th of each month indicating the monthly and total amount of money subject to refund at the end of the preceding month. The report filed should also indicate the status of the security being used to guarantee repayment of any potential refund. (Barrett)

Staff Analysis: : This recommendation proposes an increase in water rates. A timely protest might delay what may be a justified rate increase resulting in an unrecoverable loss of revenue to the Utility. Therefore, pursuant to Section 367.0814(7), F.S., in the event of a protest filed by a party other than the Utility, staff recommends that the recommended rates be approved as temporary rates. Pinecrest should file revised tariff sheets and a proposed customer notice to reflect the Commission-approved rates. The approved rates should be effective for service rendered on or after the stamped approval date on the tariff sheet, pursuant to Rule 25-30.475(1), F.A.C. In addition, the temporary rates should not be implemented until staff has approved the proposed notice, and the notice has been received by the customers. The recommended rates collected by the Utility should be subject to the refund provisions discussed below.

Pinecrest should be authorized to collect the temporary rates upon staff's approval of an appropriate security for the potential refund and the proposed customer notice. Security should be in the form of a bond or letter of credit in the amount of \$3,102. Alternatively, the Utility could establish an escrow agreement with an independent financial institution.

If Pinecrest chooses a bond as security, the bond should contain wording to the effect that it will be terminated only under the following conditions:

- 1) The Commission approves the rate increase; or,
- 2) If the Commission denies the increase, the Utility shall refund the amount collected that is attributable to the increase.

If Pinecrest chooses a letter of credit as a security, it should contain the following conditions:

- 1) The letter of credit is irrevocable for the period it is in effect, and,
- 2) The letter of credit will be in effect until a final Commission order is rendered, either approving or denying the rate increase.

If security is provided through an escrow agreement, the following conditions should be part of the agreement:

- 1) No monies in the escrow account may be withdrawn by the Utility without the express approval of the Commission;
- 2) The escrow account shall be an interest bearing account;
- 3) If a refund to the customers is required, all interest earned by the escrow account shall be distributed to the customers;
- 4) If a refund to the customers is not required, the interest earned by the escrow account shall revert to Pinecrest;
- 5) All information on the escrow account shall be available from the holder of the escrow account to a Commission representative at all times;
- 6) The amount of revenue subject to refund shall be deposited in the escrow account within seven days of receipt;
- 7) This escrow account is established by the direction of the Florida Public Service Commission for the purpose(s) set forth in its order requiring such account. Pursuant to Cosentino v. Elson, 263 So. 2d 253 (Fla. 3d DCA 1972), escrow accounts are not subject to garnishments;
- 8) The Commission Clerk must be a signatory to the escrow agreement; and,
- 9) The account must specify by whom and on whose behalf such monies were paid.

In no instance should the maintenance and administrative costs associated with the refund be borne by the customers. These costs are the responsibility of, and should be borne by, the Utility. Irrespective of the form of security chosen by Pinecrest, an account of all monies received as a result of the rate increase should be maintained by the Utility. If a refund is ultimately required, it should be paid with interest calculated pursuant to Rule 25-30.360(4), F.A.C.

Pinecrest should maintain a record of the amount of the bond, and the amount of revenues that are subject to refund. In addition, after the increased rates are in effect, pursuant to Rule 25-30.360(6), F.A.C., the Utility should file reports with the Commission's Office of Commission Clerk no later than the 20th of each month indicating the monthly and total amount of money

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subject to refund at the end of the preceding month. The report filed should also indicate the status of the security being used to guarantee repayment of any potential refund.

Issue 13: Should Pinecrest's tariff be revised to reflect an NSF fee?

Recommendation: Yes. Pinecrest's tariff should be revised to reflect an NSF fee as set forth in Sections 68.065 and 832.08(5), F.S. The fee should be effective on or after the stamped approval date on the tariff sheets pursuant to Rule 25-30.475(1), F.A.C. In addition, the fees should not be implemented until staff has approved the proposed customer notice. The Utility should provide proof of the date the notice was given no less than 10 days after the date of the notice. (Bruce)

Staff Analysis: Pursuant to Order No. PSC-97-0367-FOF-WU, the Commission approved a grandfather certificate to provide water service in Polk County for Pinecrest. With grandfather certificates, the Utility continues its existing rates and charges until a change is authorized by the Commission. The Utility had a NSF fee of \$15 prior to the Commission's jurisdiction. It appears the NSF fee was inadvertently not included during the approval of the grandfather certificate and the Utility has not collected an NSF from its customers. Staff believes that the Utility's tariff should be revised to reflect an NSF fee. However, it should be updated in accordance with Sections 68.065 and 832.08(5), F.S.

Staff believes the NSF fee should be established consistent with Section 68.065, F.S., which allows for the assessment of charges for the collection of worthless checks, drafts, or orders of payment. As currently set forth in Section 832.08(5), the following fees may be assessed:

1. \$25, if the face value does not exceed \$50,
2. \$30, if the face value exceeds \$50 but does not exceed \$300,
3. \$40, if the face value exceeds \$300,
4. five percent of the face amount of the check, whichever is greater.

Approval of an NSF fee is consistent with prior Commission decisions.¹² Furthermore, an NSF fee places the cost on the cost-causer, rather than requiring that the costs associated with the return of the NSF checks be spread across the general body of ratepayers. As such, staff recommends that Pinecrest's tariff should be revised to reflect an NSF fee as set forth in Sections 68.065 and 832.08(5), F.S. The fee should be effective on or after the stamped approval date on the tariff sheets pursuant to Rule 25-30.475(1), F.A.C. In addition, the fees should not be implemented until staff has approved the proposed customer notice. The Utility should provide proof of the date the notice was given no less than 10 days after the date of the notice.

¹² See Order Nos. PSC-10-0364-TRF-WS, issued June 7, 2010, in Docket No. 100170-WS, In re: Application for authority to collect non-sufficient funds charges, pursuant to Sections 68.065 and 832.08(5), F.S., by Pluris Wedgefield Inc., and PSC-11-0368-PAA-WU, issued September 1, 2011, in Docket No. 100128-WU, In re: Application for increase in Gulf County by Lighthouse Utilities Company, Inc.

Issue 14: What is the appropriate initial customer deposit for Pinecrest?

Recommendation: Staff recommends an initial customer deposit for water is \$68 for 5/8" x 3/4" meters. All other classes are two times the average estimated monthly bill for water. The approved customer deposits should be effective for services rendered or connections made on or after the stamped approval date on the tariff sheets, pursuant to Rule 25-30.475, F.A.C. The Utility should be required to charge the approved charges until authorized to change them by the Commission in a subsequent proceeding. (Bruce)

Staff Analysis: The Utility requested authority to collect initial customer deposits pursuant to Section 367.091, F.S. This statute authorizes the Commission to establish, increase, or change a rate or charge other than monthly rates or service availability charges.

Rule 25-30.311, F.A.C., contains the criteria for collecting, administering, and refunding customer deposits. Customer deposits are designed to minimize the exposure of bad debt expense for the Utility and, ultimately, the general body of ratepayers. Historically, the Commission has set initial customer deposits equal to the amount of two months' bills based on estimated average consumption for the customer class.¹³

Staff notes that consumption-based charges are based on the prior month's meter readings. It generally takes five to seven days from the meter reading date until customers are billed. Pursuant to Rule 25-30.335(4), F.A.C., payment may not be considered delinquent until 21 days after the bill is mailed or presented. Pursuant to Rule 25-30.320(2)(g), F.A.C., a utility may discontinue service for nonpayment of bills, provided there has been a diligent attempt to have the customer comply and the customer has been provided at least five working days' written notice. It is likely that the service would not be disconnected until well after two months subsequent to the service being rendered. Not only is collecting a customer deposit to recover this two-month period of service consistent with our past practice, it is also consistent with one of the fundamental principles of rate making – ensuring that the cost of providing service is recovered from the cost causer.¹⁴

Staff recommends an initial customer deposit for water is \$68 for 5/8" x 3/4" meters. All other classes are two times the average estimated monthly bill for water. The approved customer deposits should be effective for services rendered or connections made on or after the stamped approval date on the tariff sheets, pursuant to Rule 25-30.475, F.A.C. The Utility should be required to charge the approved charges until authorized to change them by the Commission in a subsequent proceeding.

¹³ Order No. PSC-03-1342-PAA-WS, issued November 24, 2003, in Docket No. 021228-WS, In re: Application for staff-assisted rate case in Brevard County by Service Management Systems, Inc. Order No. PSC-03-0845-PAA-WS, issued July 21, 2003, in Docket No. 021192-WS, In re: Application for staff-assisted rate case in Highlands County by Damon Utilities, Inc.

¹⁴ Order No. PSC-03-1119-PAA-SU, issued October 7, 2003, in Docket No. 030106-SU, In re: Application for staff-assisted rate case in Lee County by Environmental Protection Systems of Pine Island, Inc. Order No. PSC-96-1409-FOF-WU, issued November 20, 1996, in Docket No. 960716-WU, In Re: Application for transfer of Certificate No. 123-W in Lake County from Theodore S. Jansen d/b/a Ravenswood Water System to Crystal River Utilities, Inc.

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Date: April 1, 2013

Issue 15: Should the Utility be required to provide proof, within 90 days of an order finalizing this docket, that it has adjusted its books for all the applicable NARUC USOA primary accounts associated with the Commission-approved adjustments?

Recommendation: Yes. To ensure that the Utility adjusts its books in accordance with the Commission's decision, Pinecrest should provide proof, within 90 days of the final order in this docket, that the adjustments for all applicable NARUC USOA primary accounts have been made. (Barrett)

Staff Analysis: To ensure that the Utility adjusts its books in accordance with the Commission's decision, Pinecrest should provide proof, within 90 days of the final order in this docket, that the adjustments for all applicable NARUC USOA primary accounts have been made.

PINECREST UTILITIES, LLC
TEST YEAR ENDING 09/30/12
SCHEDULE OF WATER RATE BASE

SCHEDULE NO. 1-A
DOCKET NO. 120269-WU

DESCRIPTION	BALANCE PER UTILITY	STAFF ADJUST. TO UTIL. BAL.	BALANCE PER STAFF
1. UTILITY PLANT IN SERVICE	\$214,658	(\$4,549)	\$210,109
2. LAND & LAND RIGHTS	6,500	0	6,500
3. NON-USED AND USEFUL COMPONENTS	0	0	0
4. CIAC	(100,351)	0	(100,351)
5. ACCUMULATED DEPRECIATION	(107,209)	(2,684)	(109,893)
6. AMORTIZATION OF CIAC	68,020	2,104	70,124
7. WORKING CAPITAL ALLOWANCE	<u>2,436</u>	<u>3,922</u>	<u>6,357</u>
8. WATER RATE BASE	<u>\$84,054</u>	<u>(\$1,208)</u>	<u>\$82,846</u>

PINECREST UTILITIES, LLC
TEST YEAR ENDING 09/30/12
ADJUSTMENTS TO RATE BASE

SCHEDULE NO. 1-B
DOCKET NO. 120269-WU

	<u>WATER</u>
<u>UTILITY PLANT IN SERVICE</u>	
1. To reflect the appropriate Allocated Plant (AF 8 - WP 15).	\$1,589
2. To remove utility pick-up truck.	(8,000)
3. To reflect pro forma plant repairs.	1,861
Total	<u>(4,549)</u>
<u>ACCUMULATED DEPRECIATION</u>	
1. To remove utility pick-up truck (AF 8 - WP 15).	\$834
2. To reflect the appropriate test year accumulated depreciation (Audit Finding 1).	(6,054)
3. To reflect the appropriate AD of allocated plant.	(244)
4. To reflect pro forma plant repairs.	2,780
Total	<u>(2,684)</u>
<u>AMORTIZATION OF CIAC</u>	
To reflect the appropriate amortization of CIAC (Audit Finding 2).	<u>\$2,104</u>
<u>WORKING CAPITAL ALLOWANCE</u>	
To reflect 1/8 of test year O & M expenses.	<u>\$3,922</u>

**PINECREST UTILITIES, LLC
TEST YEAR ENDING 09/30/12
SCHEDULE OF CAPITAL STRUCTURE**

**SCHEDULE NO. 2
DOCKET NO. 120269-WU**

CAPITAL COMPONENT	PER UTILITY	SPECIFIC ADJUSTMENTS	BALANCE BEFORE PRO RATA ADJUSTMENTS	PRO RATA ADJUSTMENTS	BALANCE PER STAFF	PERCENT OF TOTAL	COST	WEIGHTED COST
1. TOTAL COMMON EQUITY	0	0	0	0	0	0.00%	11.78%	0.00%
2. TOTAL LONG TERM DEBT	85,092	0	85,092	(2,630)	82,462	99.54%	6.27%	6.24%
3. CUSTOMER DEPOSITS	<u>384</u>	<u>0</u>	<u>384</u>	<u>0</u>	<u>384</u>	<u>0.46%</u>	6.00%	<u>0.03%</u>
4. TOTAL	<u>85,476</u>	<u>0</u>	<u>85,476</u>	<u>(2,630)</u>	<u>82,846</u>	<u>100.00%</u>		<u>6.27%</u>
RANGE OF REASONABLENESS						<u>LOW</u>	<u>HIGH</u>	
RETURN ON EQUITY						<u>10.78%</u>	<u>12.78%</u>	
OVERALL RATE OF RETURN						<u>6.27%</u>	<u>6.27%</u>	

PINECREST UTILITIES, LLC TEST YEAR ENDING 09/30/12 SCHEDULE OF WATER OPERATING INCOME			SCHEDULE NO. 3-A DOCKET NO. 120269-WU		
	TEST YEAR PER UTILITY	STAFF ADJ. PER UTILITY	STAFF ADJUSTED TEST YEAR	ADJUST. FOR INCREASE	REVENUE REQUIREMENT
1. OPERATING REVENUES	<u>\$12,945</u>	<u>\$46,358</u>	<u>\$59,303</u>	<u>\$4,243</u> 7.15%	<u>\$63,546</u>
OPERATING EXPENSES:					
2. OPERATION & MAINTENANCE	\$45,995	\$4,863	\$50,858	\$0	\$50,858
3. DEPRECIATION (NET)	0	7,634	7,634	0	7,634
4. AMORTIZATION	0	(2,806)	(2,806)	0	(2,806)
5. TAXES OTHER THAN INCOME	2,251	223	2,474	191	2,665
6. INCOME TAXES	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
7. TOTAL OPERATING EXPENSES	<u>\$48,246</u>	<u>\$9,914</u>	<u>\$58,160</u>	<u>\$191</u>	<u>\$58,351</u>
8. OPERATING INCOME/(LOSS)	<u>(\$35,301)</u>		<u>\$1,142</u>		<u>\$5,194</u>
9. WATER RATE BASE	<u>\$84,054</u>		<u>\$82,846</u>		<u>\$82,846</u>
10. RATE OF RETURN	<u>-42.00%</u>		<u>1.38%</u>		<u>6.27%</u>

PINECREST UTILITIES, LLC
TEST YEAR ENDING 09/30/12
ADJUSTMENTS TO OPERATING INCOME

SCHEDULE NO. 3-B
PAGE 1 OF 3

	<u>WATER</u>
OPERATING REVENUES	
To adjust utility revenues to audited test year amount.	<u>\$46,358</u>
OPERATION AND MAINTENANCE EXPENSES	
Salaries and Wages - Employees (601)	
To reflect allocated salaries (Audit Finding 8).	<u>\$3,622</u>
Salaries and Wages - Officers (603)	
1. Remove loan payments & credits (Audit Finding 6).	\$230
2. Remove out of period expenses (Audit Finding 6).	(150)
3. To reflect allocated salaries (Audit Finding 8).	<u>908</u>
Total	<u>\$988</u>
Employee Pension & Benefits (604)	
To reflect pro forma health insurance expense.	<u>\$977</u>
Purchased Power (615)	
1. To reflect allocated expense (Audit Finding 8).	\$187
2. To reflect actual test year expense.	<u>(141)</u>
Total	<u>\$46</u>
Materials and Supplies (620)	
1. Transfer credit from revenue to Account 620.	(\$90)
2. Remove undocumented expenses.	<u>(1,794)</u>
Total	<u>(\$1,884)</u>
Contractual Services - Billing (630)	
1. To reflect allocated expense (Audit Finding 8).	\$2,670
2. Reclassify meter reading expenses to Account 636.	<u>(290)</u>
Total	<u>\$2,380</u>
Contractual Services - Professional (631)	
To reflect allocated expense (Audit Finding 8).	<u>\$2,279</u>
(CONTINUED ON NEXT PAGE)	

PINECREST UTILITIES, LLC TEST YEAR ENDING 09/30/12 ADJUSTMENTS TO OPERATING INCOME	SCHEDULE NO. 3-B PAGE 2 OF 3
(CONTINUED FROM PREVIOUS PAGE)	
Contractual Services - Testing (635)	
To reflect allocated expense (Audit Finding 8).	<u>(\$192)</u>
Contractual Services - Other (636)	
1. To reflect appropriate amount of meter reading expense (Audit Finding 7).	\$1,827
2. To reflect allocated expense (Audit Finding 8).	(4,869)
3. Include amount for meter reading incorrectly recorded in Account 630.	290
4. Amortization of tank inspection costs.	<u>(600)</u>
Total	<u>(\$3,352)</u>
Rents (640)	
1. Reclassified air valve rental to Account 675.	(\$126)
2. To reflect allocated expense (Audit Finding 8).	<u>251</u>
Total	<u>\$125</u>
Transportation Expense (650)	
1. Removed an out of period journal adjustment.	\$410
2. To reflect the appropriate allocation of transportation expense.	172
3. To reflect allocated expense (Audit Finding 8).	<u>25</u>
Total	<u>\$606</u>
Insurance Expenses (655)	
1. Removed an out of period journal adjustment (Audit Finding 6).	\$322
2. To reflect pro forma expense. (Audit Finding 7).	\$792
3. To reflect allocated expense (Audit Finding 8).	<u>(2,831)</u>
Total	<u>(\$1,717)</u>
Regulatory Commission Expense (665)	
To reflect the appropriate amount of rate case expense.	<u>\$188</u>
Bad Debt Expense (670)	
To reflect the appropriate 3-year average.	<u>\$267</u>
(CONTINUED ON NEXT PAGE)	

PINECREST UTILITIES, LLC TEST YEAR ENDING 09/30/12 ADJUSTMENTS TO OPERATING INCOME		SCHEDULE NO. 3-B PAGE 3 OF 3
(CONTINUED FROM PREVIOUS PAGE)		
Miscellaneous Expense (675)		
1. Air valve rental.		\$126
2. Removing an undocumented adjustment.		(145)
3. Removed an undocumented adjustment - late fee.		(82)
4. To reflect allocated expense (Audit Finding 8).		630
Total		<u>\$529</u>
TOTAL OPERATION & MAINTENANCE ADJUSTMENTS		<u>\$4,863</u>
		<u>WATER</u>
DEPRECIATION EXPENSE		
1. To reflect the appropriate test year depreciation expense (Audit Finding 1).		\$8,386
2. Include depreciation for pro-forma plant.		464
3. To remove utility pick-up truck.		(1,334)
4. To reflect pro forma plant repairs depreciation expense.		118
Total		<u>\$7,634</u>
AMORTIZATION		
To reflect the appropriate Amortization of CIAC (Audit Finding 2)		<u>(\$2,806)</u>
TAXES OTHER THAN INCOME		
1. To include regulatory assessment fees on test year revenue.		\$423
2. To reflect allocated payroll taxes (Audit Finding 8).		481
3. To adjust property taxes to audited amount. (Audit Finding 11).		(681)
Total		<u>\$223</u>

PINECREST UTILITIES, LLC
TEST YEAR ENDING 09/30/12
ANALYSIS OF WATER OPERATION AND
MAINTENANCE EXPENSE

SCHEDULE NO. 3-C
DOCKET NO. 120269-WU

	TOTAL PER UTILITY	STAFF PER ADJUST.		TOTAL PER PER STAFF
(601) SALARIES AND WAGES - EMPLOYEES	\$0	\$3,622		\$3,622
(603) SALARIES AND WAGES - OFFICERS	7,120	988	[1]	8,108
(604) EMPLOYEE PENSION & BENEFITS	0	977		977
(610) PURCHASED WATER	0	0		0
(615) PURCHASED POWER	2,668	46	[2]	2,715
(616) FUEL FOR POWER PRODUCTION	0	0		0
(618) CHEMICALS	782	0		782
(620) MATERIALS AND SUPPLIES	2,756	(1,884)	[3]	871
(630) CONTRACTUAL SERVICES - BILLING	290	2,380		2,670
(631) CONTRACTUAL SERVICES - PROFESSIONAL	4,507	2,279		6,785
(635) CONTRACTUAL SERVICES - TESTING	4,593	(192)		4,402
(636) CONTRACTUAL SERVICES - OTHER	12,458	(3,352)	[4,9]	9,107
(640) RENTS	793	125	[4,5]	918
(650) TRANSPORTATION EXPENSE	1,077	606	[6]	1,684
(655) INSURANCE EXPENSE	3,404	(1,717)	[7]	1,686
(665) REGULATORY COMMISSION EXPENSE	0	188		188
(670) BAD DEBT EXPENSE	640	267		907
(675) MISCELLANEOUS EXPENSES	<u>4,908</u>	<u>529</u>	[5,8,10]	<u>5,437</u>
	<u>\$45,995</u>	<u>\$4,863</u>		<u>\$50,858</u>

PINECREST UTILITIES, LLC.
TEST YEAR ENDED SEPTEMBER 30, 2012
MONTHLY WATER RATES

SCHEDULE NO. 4
DOCKET NO. 120269-WS

	UTILITY'S EXISTING RATES	STAFF RECOMMENDED RATES	4 YEAR RATE REDUCTION
<u>Residential and General Service</u>			
<u>Base Facility Charge by Meter Size:</u>			
5/8"X3/4"	\$14.45	\$14.61	\$0.05
3/4"	\$21.67	\$21.92	\$0.07
1"	\$36.13	\$36.53	\$0.12
1-1/2"	\$72.26	\$73.05	\$0.24
2"	\$115.61	\$116.88	\$0.39
3"	\$231.22	\$233.76	\$0.77
4"	\$361.28	\$365.25	\$1.21
6"	\$722.55	\$730.50	\$2.42
<u>Residential and General Service Gallonage Chg.</u>			
Per 1,000 gallons	\$4.35	\$4.74	\$0.02
<u>Typical Residential 5/8" x 3/4" Meter Bill Comparison</u>			
3,000 Gallons	\$27.50	\$28.83	
5,000 Gallons	\$36.20	\$38.31	
10,000 Gallons	\$57.95	\$62.01	