#### STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

# BEFORE THE RHODE ISLAND PUBLIC UTILITIES COMMISSION

IN RE: CITY OF NEWPORT, UTILITIES DEPARTMENT, WATER DIVISION APPLICATION TO CHANGE RATE SCHEDULES

Docket No. 4025

Direct Testimony and Schedules of

**Ernest Harwig** 

On behalf of

The United States Department of the Navy

Project 9095 April 1, 2009



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#### **Direct Testimony of Ernest Harwig**

- 1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
- 2 A. My name is Ernest Harwig. My business address is 57 Cedar Summit Road, Asheville,
- 3 North Carolina, 28803.
- 4 Q. WHAT IS YOUR OCCUPATION?
- 5 A. I have been a consultant in the field of public utility regulation for over 25 years, with an
- 6 emphasis on water and wastewater utilities.
- 7 Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.
- 8 A. These are set forth in Appendix A of my testimony.
- 9 Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING
- 10 A. I am under contract to Brubaker & Associates, Inc. and have been asked to testify on
- behalf of the United States Department of the Navy (Navy). Naval Station Newport in
- 12 Newport, Rhode Island purchases large volumes of water from the Water Division of the

1 City of Newport (NWD or Utility), and it would experience a significant increase in its cost 2 of water if the rates proposed by NWD were to become effective.

#### 3 Q. WHAT IS THE SUBJECT OF YOUR TESTIMONY?

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My direct testimony will focus on certain elements of NWD's claimed revenue requirement and allocation of costs. In particular, I will discuss the basis for allocating the City of Newport's support services to the Water Department, as outlined in its Cost Allocation Manual (CAM); the appropriate method of financing of new plant in service with projected service lives in excess of ten years; and the percentage of operating cost requirements that is a reasonable addition to projected operating costs. I also discuss the appropriateness of the current cost of service study and the implementation of the study as ordered in Docket No. 3818.

My electing not to address other elements of the Utility's direct testimony should not be construed as an endorsement of the positions put forth by it on any other issues.

#### 14 Q. PLEASE SUMMARIZE YOUR TESTIMONY.

Α. 1. NWD is one of five Enterprise Funds that benefit from various support services provided by other departments of the City of Newport. These support services are financed by the City's General Fund, and their costs are in turn allocated among the five Funds in accordance with a newly developed Cost Allocation Manual, as ordered by the Commission in NWD's last rate case, Docket No. 3818. The City's allocations add \$781,700 to NWD's administrative expense. This amount is excessive, because NWD's share of costs is not based on the revenue requirement it is requesting in this Docket, and the expenses associated with the City Council and the City Clerk are apportioned on a simple count of the number of Council Docket items heard at each meeting. A review of City Council minutes for Fiscal Year 2008 shows that the number of Docket items is an unreliable proxy for the degree of attention given to water department operations, and it overstates the amount of time spent on Water Department matters by the Council and the Clerk. To the extent that support costs are collected from Enterprise Fund customers, including Middletown retail water customers, Portsmouth Water and Fire District (PWFD) and the Navy, taxpayers in Newport are relieved of this burden. My corrections to the City's allocations reduce the allocation to NWD by \$188,700, as shown in Schedule EH-2.

- 2. NWD proposes to finance \$1.65 million of capital improvements in Fiscal Year 2010 from current revenues. In response to Navy Data Request No. 1-2, NWD states that several of these improvements have expected service lives of 10, 20 and even 50 years. In light of this, it is more appropriate to finance these long-lived improvements with long-term debt. In this manner, costs will be spread out more in line with the useful lives of these capital improvements, and the cost burden will not fall exclusively on current ratepayers. Debt financing of these items reduces NWD's revenue request by \$517,241, as summarized in Schedule EH-3.
  - 3. NWD is requesting an Additional Revenue Requirement equal to 3.00% of its operating costs. In light of the magnitude of NWD's overall rate increase request, and to reduce rate shock, a 1.5% margin is more appropriate. My adjustment, shown in Schedule EH-4, reduces NWD's request by \$129,288, as shown in Schedule EH-1.
  - 4. NWD proposes to collect any additional revenues granted to it through an equal percent increase in rates to all customers. This only serves to perpetuate or even exacerbate any disparities between the cost of serving individual customer classes and the revenues collected from them via the existing rate design. When NWD's demand study and cost of service study are completed later this year, the Commission should conduct a Phase II of the instant proceeding to examine the studies and to collect the revenue requirement approved in Phase I in a cost-based manner.

### NWD's Cost Allocation Manual

#### Q. WHY HAS THE CITY OF NEWPORT DEVELOPED A COST ALLOCATION MANUAL

#### FOR ITS ENTERPRISE OPERATIONS?

A. The Water Department is one of five Enterprise Funds administered by the City of Newport. (The other four Funds are the Water Pollution Control Fund, the Maritime Fund, the Beach Fund, and the Parking Fund.) These Enterprises receive support services from other departments within the overall framework of City government, such as the City Council and City Clerk, the City Manager and City Solicitor, Financing, Accounting, Purchasing and Data Processing.

In prior NWD rate cases, a share of these costs was allocated to NWD primarily in proportion to its share of the City's total budget. This method was not satisfactory to all parties in those cases. In its Final Order in NWD's last rate case, Docket No. 3818,

the Commission directed the City to develop a CAM that set forth criteria reflecting each

Fund's use of City support services. The CAM describes these criteria in detail. NWD

has applied these criteria in the instant rate case to calculate its specific share of support costs.

# 5 Q. DO YOU AGREE WITH ALL THE CRITERIA FOUND IN THE CITY'S CAM AND 6 THEIR APPLICATION IN CALCULATING SPECIFIC ALLOCATION FACTORS?

A. No, I do not. Specifically, I believe NWD grossly overstates its total share of the City's operating budget at 22.30% (see RFC Schedule D Corrected 2). I also believe that NWD overestimates the amount of time devoted to water utility operations by the City Council and the City Clerk.

- 11 Q. PLEASE EXPLAIN HOW NWD OVERSTATES ITS SHARE OF THE CITY'S BUDGET,

  12 AND HOW THAT IN TURN OVER-ALLOCATES CITY SUPPORT COSTS TO WATER
- 13 **OPERATIONS.**
- RFC Schedule D Corrected 2 assumes that NWD's revenue requirement is \$19.94 14 Α. 15 million, instead of the approximately \$12 million it is actually requesting for Fiscal Year 16 2010. (The difference between these two figures is detailed in NWD's response to the Division of Public Utilities & Carriers' Data Request No. 1-38.) On this basis, it 17 calculates that its share of the General Fund plus the other four Enterprise Funds is 18 22.30% of a total expenditure of \$89.42 million. Most notably, the \$19.94 million 19 20 includes \$8.35 million of debt funded capital expenditures, while NWD's revenue request 21 includes only the debt service costs for capital improvements.

#### 1 Q. DO YOU DISAGREE WITH NWD'S CALCULATION?

- 2 A. Yes, I do. I believe it is appropriate to calculate NWD's share of the total budget on the
- 3 basis of its actual revenue request. This approach is also consistent with the
- 4 Compliance Filing made in Docket No. 3818.

#### 5 Q. WHAT IS THE EFFECT OF BASING NWD'S SHARE OF THE TOTAL CITY BUDGET

#### 6 ON THE BASIS OF ITS ACTUAL REVENUE REQUIREMENT?

- 7 A. As shown on my Schedule EH-2, NWD's share of the total budget drops to 13.72%.
- 8 Thus, its share of the support costs allocated to it with this factor, namely the City
- 9 Manager, City Solicitor, 80% of Finance costs and non-telephone MIS costs, decreases
- 10 accordingly.

#### 11 Q. PLEASE CONTINUE.

- 12 A. NWD claims that the number of items pertaining to the Water Department in proportion
- to the total number of items docketed for discussion at City Council meetings and
- workshops is a reasonable way to estimate the amount of time and effort devoted to the
- Water Department by the Council and by the City Clerk. (See Page 2 of the CAM and
- 16 NWD's response to PWFD's Data Request No. 1-10.) NWD has calculated that 11.40%
- of all docketed items pertained to the water utility.

#### 18 Q. DO YOU AGREE WITH THIS METHOD OF ESTIMATING CITY COUNCIL AND CITY

#### 19 **CLERK EXPENSES IN RELATION TO THE WATER DEPARTMENT?**

- 20 A. No, I do not. I have reviewed the Minutes of City Council meetings occurring during the
- 21 2008 Fiscal Year. It is clear from my review that some docketed items are discussed
- much more fully than others. As they pertain to NWD, in the majority of instances, the

Minutes simply note that a communication was received and the accompanying resolution was adopted and voted unanimously by the Council. The Minutes reflected little or no discussion of these items. Other subjects, in contrast, such as street paving, entertainment licenses and environmental projects were often discussed in greater detail than were water utility-related items. A simple tally of docketed items is thus an unreliable proxy for the time actually spent by the Council on Enterprise Fund issues. In view of this, I believe that an allocation factor of 5.00% is very generous.

To the extent that these support costs are collected from Enterprise Fund customers, including Middletown retail water customers, PWFD and the Navy, property tax payers in Newport are relieved of this burden.

As a result of the two adjustments discussed above, the allocation of City support service costs to NWD is decreased by \$188,700, as shown in Schedule EH-2.

# Rate-Financed Capital Improvement Projects

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# Q. HAVE YOU REVIEWED THE INDIVIDUAL ITEMS SLATED TO BE FINANCED FROM CURRENT REVENUES?

Yes, I have. They are shown on RFC Schedule 4. In response to the Navy's Data Request No. 1-2, NWD provided its estimate of the service lives of the individual capital improvements to be financed with current rates. These projects and their related service lives are shown on Schedule EH-3. Several of these projects, including GIS and Hydraulic Modeling, the main from Gardiner to Paradise, the Sherman Street Main Improvements, Meter Replacements, Water Trench restoration and Fire Hydrant replacement all have service lives of ten years or greater. The total investment cost of these projects is \$553,199.

### 1 Q. DO YOU BELIEVE IT IS APPROPRIATE TO FINANCE SUCH LONG-LIVED

#### 2 **PROJECTS WITH CURRENT REVENUES?**

by financing them with long-term debt.

- A. Absolutely not. These projects will benefit NWD's customers for many years into the future. But if they are financed entirely from current revenues, the entire burden of costs for these projects will be borne by today's ratepayers. This is unfair because current customers will be subsidizing future customer benefits and cost responsibility. The costs of these projects should be spread out more in accord with their expected service lives
- 9 Q. WHAT IS THE IMPACT ON NWD'S REVENUE REQUEST IF THESE PROJECTS ARE

#### 10 **DEBT FUNDED?**

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11 A. NWD's revenue requirement would decrease by \$553,199. However this would be
12 offset by an increase in interest cost associated with debt to finance these projects.
13 Assuming interest only payments for the first year of construction, as posited by NWD in
14 RFC Schedule 5 Revised, the additional interest expense would be \$35,958. The net
15 effect is a reduction of \$517,241 to NWD's revenue request, as shown in

## 17 Additional Revenue Requirement

Schedule EH-3.

- 18 Q. IS NWD REQUESTING AN ADDITIONAL AMOUNT OF REVENUE TO HELP COVER
  19 UNEXPECTED INCREASES IN OPERATING AND CAPITAL COSTS?
- 20 A. Yes, it is. NWD is requesting an additional 3.00% of operating expenses to cover such contingencies.

#### 1 Q. DO YOU BELIEVE THIS REQUEST IS REASONABLE?

A. No, I do not. I believe a 1.50% margin is adequate, given the magnitude of the percent increase in rates NWD is requesting. My calculation of the additional revenue requirement is shown on Schedule EH-4. This 1.50% margin is also consistent with the

5 Commission's Order and the Compliance Filing in Docket No. 3818.

# 6 Q. DO YOU HAVE ANY ADDITIONAL THOUGHTS ON THE LEVEL OF INCREASE 7 SOUGHT BY NWD IN THIS CASE?

A. Yes I do. NWD has the option to finance its capital improvements either with debt or with financing from current revenues. Likewise, it can choose the percent of operating costs to use as a cushion against unforeseen expenses. These items are under its control. So I am somewhat surprised that NWD has chosen to finance \$1.65 million of capital expenditures from rates and to once again propose a 3.00% margin, especially in light of the current 10.3% unemployment rate in the State of Rhode Island and the current 11.2% unemployment rate in the City of Newport. An increase in the cost of water as proposed by NWD only makes it harder for those that are required to pay for water service.

## Cost Allocation Proposed

18 Q. DO YOU AGREE WITH THE METHOD OF IMPOSING A RATE INCREASE

19 **PROPOSED BY NWD?** 

A. No, I do not.

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<sup>1</sup>United States Department of Labor, Bureau of Labor Statistics, Economy at a Glance, Rhode Island (www.bls.gov/eag/eag.ri.htm).

<sup>&</sup>lt;sup>2</sup>LMI Data Center, Local Area Unemployment Statistics (www.dlt.ri/lmi/laus/town/newport.htm).

#### 1 Q. PLEASE EXPLAIN.

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A. NWD proposes to increase all rates by an equal percent to recover any revenue increase it may be granted in this case. However, an across-the-board increase could perpetuate, or even exacerbate, disparities between the revenues collected from each customer class and the cost to serve those respective classes. This has been a concern expressed by the Navy in several of NWD's past rate cases. There is no evidence available to determine whether these potential inequities are indeed the case until NWD produces a fully allocated cost of service study, based on the peak demand study scheduled to begin in May of this year. Even so, NWD has indicated in its Response to Navy Data Request No. 1-5 that it may have to seek a 60-day extension of the Commission's deadline for filing the cost of service study. Given this timetable, the study would not be available for analysis by the parties to this case until sometime in November. Potential inequities would continue until cost-based rates are implemented.

# 14 Q. WHEN THE COST STUDY IS FINALLY COMPLETED, HOW AND WHEN SHOULD 15 ITS RESULTS BE REFLECTED IN NWD'S RATE STRUCTURE?

16 A. It should be implemented in a Phase II of the instant proceeding.

#### 17 Q DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

18 A Yes, it does.

#### **Qualifications of Ernest Harwig**

#### 1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. Ernest Harwig. My business mailing address is 57 Cedar Summit Road, Asheville, NC 28803.

#### 4 Q. WHAT IS YOUR OCCUPATION?

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5 A. I am a consultant in the field of public utility regulation. I work on a contract basis with 6 Brubaker & Associates, Inc., energy, economic and regulatory consultants.

#### 7 Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

I graduated from Austin College with a Bachelor of Arts Degree in Economics. Subsequently, I received a Master of Arts Degree in International Economics from Texas Tech University. I later attended seminars in Economics at the University of Cologne in the Federal Republic of Germany. I also received a Master of Arts Degree while completing all course work towards the Ph.D. at Southern Methodist University. My major field was Industrial Organization.

Prior to joining Drazen-Brubaker & Associates, Inc., I was employed as a utility rate analyst with the Public Service Commission of Wisconsin, where I represented the Staff in private and municipal electric utility rate cases. I also prepared exhibits for presentation in major electric utility rate cases.

I joined the firm of Drazen-Brubaker & Associates, Inc., in September 1975. In addition to our main office in St. Louis, the firm also has branch offices in Phoenix, Arizona; Chicago, Illinois; Corpus Christi, Texas; and Plano, Texas. In April 1995, the firm of Brubaker & Associates, Inc. was formed. It includes most of the former DBA

principals and staff. At the firm, I have been engaged in the preparation of testimony and exhibits relating to electric, gas, water, wastewater and steam utilities. These included determinations of rate base, operating income and depreciation rates; the performance of cost of service studies; and the design of rates for utility services. I have also provided technical assistance in the negotiation of contracts for water and wastewater services between municipal suppliers and industrial customers. I have been a member of the American Water Works Association since 1986.

#### Q. ARE YOU AN AUTHOR OF ANY PUBLICATIONS?

9 A. Yes. I am the co-author of two articles: "Municipal Electric Utility Pricing," which
10 appeared in the February 1976 issue of <u>Governmental Finance</u>, and "Water Rates: An
11 Industrial User's View," which appeared in the May 1986 issue of <u>Journal AWWA</u>.

#### Q. HAVE YOU PREVIOUSLY APPEARED BEFORE A REGULATORY COMMISSION?

13 A. Yes. I have testified before the public utility regulatory commissions of Alabama,
14 California, Delaware, Illinois, Indiana, Kentucky, Minnesota, Missouri, New Hampshire,
15 New Jersey, Pennsylvania, Rhode Island, Tennessee, Texas, West Virginia and
16 Wisconsin. In addition, I have assisted both utility customers and suppliers in local rate
17 proceedings and contract negotiations for water and wastewater services in about
18 twenty states.

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### **Newport Water Department RIPUC Docket No. 4025**

#### Summary of Navy Adjustments To NWD Revenue Requirement Proposal

<u>Line</u>	<u>Description</u>	Amount <u>Per NWD</u> (1)	Navy <u>Adjustment</u> (2)	Adjusted <u>Amount</u> (3)	Reference (4)
	Operating Revenue Requirements				
1	Administration	\$2,568,543	(\$188,700)	\$2,379,843	Schedule EH-2
2	Customer Service	724,850	0	724,850	
3	Source of Supply - Island	633,700	0	633,700	
4	Source of Supply - Mainland	146,500	0	146,500	
5	Treatment - Newport Plant (Station One)	1,712,800	0	1,712,800	
6	Treatment - Lawton Valley	1,650,150	0	1,650,150	
7	Water Laboratory	249,450	0	249,450	
8	Transmission & Distribution Maintenance	1,100,900	0	1,100,900	
9	Fire Protection	21,000	0	21,000	
10	Total Operating Requirements	\$8,807,893	(\$188,700)	\$8,619,193	
	Capital Revenue Requirements				
11	Contribution to Debt Service Account	\$1,893,101	\$35,958	\$1,929,059	Schedule EH-3
12	Contribution to Capital Spending Account	1,652,019	(553,199)	1,098,820	Schedule EH-3
13	Total Capital Requirements	\$3,545,120	(\$517,241)	\$3,027,879	
14	Subtotal -Revenue Requirements	\$12,353,013	(\$705,941)	\$11,647,072	
15	Additional Rev Requirements (Operating Revenue)	\$264,237	(\$134,949)	\$129,288	Schedule EH-4
16	Revenue Requirements before Offsets	\$12,617,250	(\$840,890)	\$11,776,360	
17	Less: Revenue Offsets	(\$708,065)	\$0	(\$708,065)	
18	Net Revenue Requirements	\$11,909,185	(\$840,890)	\$11,068,295	

Sources: RFC Schedule 1

RFC Schedule D Corrected 2

NWD Response to Navy DR 1-4, Attachment RFC Schedule 5 Revised

#### **Newport Water Department RIPUC Docket No. 4025**

#### **Adjustments to Cost Allocation Manual**

<u>Line</u>	City Service Item	В	udgeted Cost To Be <u>Allocated</u> (1)	Allocation Percent <u>Per NWD</u> (2)	Allocation To Water Dept. <u>Per NWD</u> (3)	Allocation Percent <u>Per Navy</u> (4)	Allocation To Water Dept. <u>Per Navy</u> (5)	Adjustment Col. 5 - Col. 3) (6)
1	Audit Fees	\$	84,875	6.18%	\$ 5,245	6.18%	\$ 5,245	\$ -
2	City Council		76,665	11.40%	8,740	5.00%	3,833	(4,907)
3	Citizen Survey		16,000	8.30%	1,328	8.30%	1,328	-
4	City Clerk		319,706	11.40%	36,446	5.00%	15,985	(20,461)
5	City Manager		418,103	22.30%	93,237	13.72%	57,364	(35,873)
6	Human Resources		303,388	12.90%	39,137	12.90%	39,137	-
7	City Solicitor		289,177	22.30%	64,486	13.72%	39,675	(24,811)
8	Finance Admin 80%		310,370	22.30%	69,213	13.72%	42,583	(26,630)
9	Finance Admin 10%		38,796	31.00%	12,027	31.00%	12,027	-
10	Purchasing		90,123	17.90%	16,132	17.90%	16,132	-
11	Assessment		113,456	10.00%	11,346	10.00%	11,346	-
12	Collections		313,663	20.50%	64,301	20.50%	64,301	-
13	Accounting - 5%		9,749	100.00%	9,749	100.00%	9,749	-
14	Accounting		383,951	16.90%	64,888	16.90%	64,888	-
15	Public Safety		28,531,884	0.10%	28,532	0.10%	28,532	-
16	Facilities Maint.		823,521	4.00%	32,941	4.00%	32,941	 
17	Total Legal & Admin.	\$	32,123,427		\$ 557,747		\$ 445,065	\$ (112,682)
18	MIS - Communications	\$	328,960	7.90%	\$ 25,988	7.90%	\$ 25,988	\$ -
19	MIS - Other Costs	_	886,172	22.30%	197,616	13.72%	121,583	 (76,034)
20	Total MIS	\$	1,215,132		\$ 223,604		\$ 147,571	\$ (76,034)
21	Total Administrative Cost	\$	33,338,559		\$ 781,352		\$ -	\$ (188,716)
22	Use				\$ 781,700			\$ (188,700)

Source: RFC Schedule D Corrected 2 Workpaper

### **Newport Water Department RIPUC Docket No. 4025**

### **Adjustments to Rate-Financed Capital Improvement Projects**

<u>Line</u>	Rate Funded Project	Estimated Service Lives Per NWD Response to Navy Dat. Req. 1-2 (1)		Rate Year <u>2010</u> (2)
1	Safe Yield Study		_	
2	GIS and Hydraulic Modeling	20	\$	90,000
3 4	IRP Update- RIDOH due Jan 2010	5 5		80,000
4 5	Water Quality Protection Plan Update- RIWRB WSSMP 5 year Update- RIWRB due July 2012	5		80,000
6	Easton Pond Dam Imprv - North & West Embank			
7	Maguire Amen #11 Sediment Assess prop for NOV-CA			
8	Sediment Assessment - Lawton Brook	NA		35,000
9	Maguire Amend #9- assist with NOV- CA			33,333
10	LVWTP RIPDES CA- Constructed Wetlands; Maguire Amend #12			
11	Constructed Wetlands/Flow Diversion			
12	Main from Gardiner to Paradise	50		150,000
13	Intake at Paradise			
14	Intake at Watson & Nonquit			-
15	Intake at Sissons			
16	Demolition of Old Nonquit Pump Sta	NA		125,000
17	Dam and Dike Rehabilitation - Lawton Valley			
18 19	Dam and Spillway Rehabilitation - Station 1	NA		20.440
20	Lawton Valley WTP - Chloramine Conversion Design Lawton Valley Water Age Study	INA		30,410
21	LVWTP pH design			
22	Station 1 - Chloramine Conversion Design	NA		30,410
23	Sta 1 pH design			00,110
24	City Agent for New LVWTP & Sta1 Imprv			
25	Ocean Ave Water project (closeout)			
26	Distribution Main Iprov.(Sherman St) Design & Construct	50		156,952
27	Meter Replacement	10		64,247
28	Forest Ave Pump Sta Imprv.			-
29	Water Trench Restoration	10		75,000
30	Fire Hydrant Replacement	50		17,000
31	LV 4 Mgal resrv Aeration- Design & Constr	5		600,000
32	Equipment and Vehicle Replacement	6		118,000
33 34	Fire Code Upgrades		\$	1,652,019
34	Gross Rate Funded Capital		Ф	1,052,019
	Cost of Rate-Funded Projects with Service Lives			
35	of Ten Years or Greater		\$	553,199
36	Interest Rate per NWD Response to Navy DR 1-4			<u>6.50%</u>
37	Additional Interest Cost		\$	35,958
00	0.470		•	4 000 000
38	Cost of Remaining Rate-Funded Capital Improvements		\$	1,098,820

Sources: RFC Schedule 4

NWD Response to Navy Data Request No. 1-2 and No. 1-4

# Newport Water Department RIPUC Docket No. 4025

# **Calculation of Additional Revenue Requirement**

<u>Line</u>	<u>Description</u>	Amount (1)
1	Total Operating Requirements	\$8,619,193
2	Additional Revenue Requirement at 1.50%	<u>1.50%</u>
3	Additional Revenue Requirement	\$129,288