BEFORE THE

PUBLIC UTILITIES COMMISSION OF RHODE ISLAND

THE NARRAGANSETT
BAY COMMISSION

DOCKET NO. 4364

SURREBUTTAL TESTIMONY

OF

THOMAS S. CATLIN

ON BEHALF OF THE
DIVISION OF PUBLIC UTILITIES AND CARRIERS

May 8, 2013



ASSOCIATES, INC. 10480 Little Patuxent Parkway Suite 300 Columbia, Maryland 21044

BEFORE THE

PUBLIC UTILITIES COMMISSION

OF RHODE ISLAND

THE NARRAGANSETT)	DOCKET NO 4264
BAY COMMISSION)	DOCKET NO. 4364

Surrebuttal Testimony of Thomas S. Catlin

1	Q.	WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS
2		ADDRESS?
3	A.	My name is Thomas S. Catlin. I am a principal with Exeter Associates, Inc. Our
4		offices are located at 10480 Little Patuxent Parkway, Suite 300, Columbia, Maryland
5		21044. Exeter is a firm of consulting economists specializing in issues pertaining to
6		public utilities.
7	Q.	HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS
8		PROCEEDING?
9	A.	Yes. My direct testimony on behalf of the Division of Public Utilities and Carriers
10		(the Division) was submitted on March 22, 2013. My qualifications and experience
11		are set forth in that testimony.
12	Q.	WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?
13	A.	The purpose of my surrebuttal testimony is to respond to the rebuttal testimony of
14		Mr. Walter E. Edge that was submitted on behalf of The Narragansett Bay
15		Commission. In addition, I will update the Division's recommendation with regard to
16		the overall revenue increase that NBC should receive and the rates necessary to
17		recover those revenues.

1	Q.	PLEASE SUMMARIZE THE STATUS OF THE ISSUES THAT YOU
2		RAISED IN YOUR DIRECT TESTIMONY IN LIGHT OF MR. EDGE'S
3		REBUTTAL TESTIMONY.
4	A.	In his rebuttal testimony, Mr. Edge accepted my adjustments to grant related costs,
5		workers compensation – old claims, Field's Point chemical costs, bad debt expense
6		and debt service. The status of the other issues that I raised in my direct testimony is
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21		 Employee Health Insurance. Mr. Edge accepted my adjustment to correct the weighted average of the premiums, but updated to reflect the recent FY 2014 (rate year) premiums which became known after my testimony was prepared. I agree with Mr. Edge's revised estimate of health insurance costs. Biosolids Disposal Costs. Mr. Edge accepted my adjustment to the cost per ton paid by NBC for disposal of biosolids, but updated the quantity of sludge requiring disposal to reflect the most recent two-year average of tons disposed. I have accepted his updated cost estimate. Maintenance and Service Agreements. Mr. Edge presented a revised expense claim based on a detailed listing of maintenance and service agreement providers and the expected rate year costs. I have accepted his revised claim.
21 22 23 24 25 26 27 28		• Natural Gas Expense. NBC updated its original estimate of natural gas costs to reflect National Grid's GCR rate for the 12 months ending October 31, 2013 rather than recognizing the estimated GCR rate for the rate year ended June 30, 2014 that I used. I have not accepted this change and will discuss this issue subsequently.
30 31 32 33 34		• <u>Electricity Costs</u> . Mr. Edge accepted my adjustments to electricity costs and the offsetting sales of RECs, but revised supply costs to reflect NBC's new three-year supply contract entered into after my direct testimony was prepared. I have accepted NBC's revised estimate of electricity costs.
35 36 37		 Operating Reserve. Mr. Edge disagrees with my use of a one percent operating reserve allowance based on prior Commission orders. I have not revised my proposal.

1	Q.	WHAT COMMENTS DO YOU HAVE WITH REGARD TO THE
2		NATIONAL GRID GCR RATE TO BE USED IN ESTIMATING
3		NATURAL GAS COSTS?
4	A.	As explained in my direct testimony, I have based my estimate of NBC's natural gas
5		costs for the rate year on an estimate of National Grid's average GCR rate for the
6		12 months ended June 30, 2014. To develop this average GCR rate, I utilized
7		National Grid's actual GCR rate for the 12 months ended October 31, 2013 (the 2013
8		GCR rate) for the first four months of the rate year. For the last eight months of the
9		rate year, I estimated National Grid's 2014 GCR rate based on its actual hedged gas
10		supply costs for the period November 2013 through October 2014 compared to the
11		hedged supply costs for the prior year. I am continuing to recommend the use of this
12		average National Grid GCR rate for the rate year instead of the 2013 GCR rate
13		proposed by NBC. As shown on updated Schedule TSC-8, this results in a reduction
14		to NBC's updated gas supply cost claim of \$12,868.
15	Q.	HAS NBC RAISED ANY NEW ISSUES IN ITS REBUTTAL
16		TESTIMONY?
17	A.	Yes. In his rebuttal, Mr. Edge reduced revenues by \$93,462 to reflect NBC's tariff
18		advice filing in Docket No. 4401 in which NBC proposed to eliminate BOD
19		(Biological Oxygen Demand) and TSS (Total Suspended Solids) surcharges. I have
20		assumed that the Commission will approve NBC's request and I have accepted
21		NBC's adjustment to revenue.
22	Q.	HAVE YOU PREPARED AN UPDATED RECOMMENDATION
23		REGARDING NBC'S REVENUE DEFICIENCY?
24		Yes. As shown on my Updated Schedule TSC-1, I have determined NBC's overall
25		revenue requirement to be \$94,313,267. This represents an increase of \$7,964,892

- over revenues at present rates. As shown on Updated Schedule TSC-13, the
 concomitant overall increase in user fee revenue is 9.56 percent. Updated Schedule
 TSC-14 shows the calculation of the rates required to generate this increase in
- 4 revenue.
- 5 Q. DOES THIS COMPLETE YOUR TESTIMONY?
- 6 A. Yes, it does.

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BEFORE THE

PUBLIC UTILITIES COMMISSION OF RHODE ISLAND

THE NARRAGANSETT)	DOCKET NO 4264
BAY COMMISSION)	DOCKET NO. 4364

SCHEDULES ACCOMPANYING THE SURREBUTTAL TESTIMONY

OF

THOMAS S. CATLIN

ON BEHALF OF THE DIVISION OF PUBLIC UTILITIES AND CARRIERS

May 8, 2013

EXETER

ASSOCIATES, INC. 10480 Little Patuxent Parkway Suite 300 Columbia, Maryland 21044

Summary of Revenues and Expenses at Present and Proposed Rates Rate Year Ended June 30, 2014

	Rate Year Amount Per NBC	mount Per Rebuttal Amount Per Division				Rate Year at Present Rates	Allowable Rate Increase	Rate Year at Proposed Rates	
Revenue									
User Fee Revenue	\$ 83,335,797	\$ -	\$ 83,335,797	\$	1,704	\$83,337,501	\$7,964,892	\$ 91,302,393	
Other Service Revenue	1,570,246	(93,462)	1,476,784		-	1,476,784	-	1,476,784	
Miscellaneous	1,178,440	355,650	1,534,090			1,534,090		1,534,090	
Total Revenue	\$ 86,084,483	\$ 262,188	\$ 86,346,671	\$	1,704	\$86,348,375	\$7,964,892	\$ 94,313,267	
Expenses									
Personnel Services	21,011,491	155,145	21,166,636		-	21,166,636	-	21,166,636	
Operating Supplies & Expenses	14,520,058	(372,200)	14,147,858		(12,868)	14,134,990	-	14,134,990	
Professional Services	2,715,533	,	2,715,533			2,715,533	-	2,715,533	
Capital Outlays	· · · -	-	-		-	-	=	-	
Amortization	9,690	-	9,690		-	9,690	-	9,690	
Debt Service	47,790,051	(2,895,721)	44,894,330		-	44,894,330	-	44,894,330	
Debt Coverage	11,947,513	(723,930)	11,223,583		•	11,223,583	-	11,223,583	
Total Expenses	\$ 97,994,336	\$ (3,836,706)	\$ 94,157,630	\$	(12,868)	\$94,144,762	\$ -	\$ 94,144,762	
Operating Reserve	573,852	(3,402)	570,450		(401,945)	168,505	_	168,505	
Total Cost of Service	\$ 98,568,188	\$ (3,840,108)	\$ 94,728,080	\$	(414,813)	\$ 94,313,267	\$ -	\$ 94,313,267	
Revenue Surplus/(Deficiency)	\$ (12,483,705)	\$ 4,102,296	\$ (8,381,409)	\$	416,517	\$ (7,964,892)	\$7,964,892	\$ -	

Summary of Division Adjustments to Rate Year Revenues and Expenses at Present Rates Rate Year Ended June 30, 2014

Description	Amount	Source
Revenue Adjustments		
Billing Determinant True-Up	1,704	Refer to testimony
Expense Adjustments		
Grant Expense	-	Schedule TSC-3
Employee Health Insurance	-	Schedule TSC-4
Workers' Compensation-Old Claims	-	Schedule TSC-5
Biosolids Disposal Costs	-	Schedule TSC-6
Maintenance & Service Agreements	-	Schedule TSC-7
Natural Gas Expense	(12,868)	Schedule TSC-8
Electricity Expense	-	Schedule TSC-9
Field's Point Chemicals	-	Schedule TSC-10
Bad Debt Expense	-	Schedule TSC-11
Debt Service	-	Schedule TSC-12
Operating Reserve	(401,945)	See Note (1)
Total Division Adjustments to Expenses	\$ (414,813)	
Total Divison Adjustments to Operating Inccome	\$ 416,517	

⁽¹⁾ Adjusted to reflect 1.0% of Division Operating Expenses excluding Personnel and Debt costs per Schedule TSC-1. Refer to direct testimony for explanation.

Adjustment to Remove Additional Grant Related Costs Rate Year Ended June 30, 2014

	Am	ount
Additional Grant Related Expenses in Test Year (1)	\$	-
Adjustment to Rate Year Expense	\$	_

Note:

(1) NBC removed expenses in its rebuttal filing as shown on Schedule WEE-R2.

Adjustment to Health Insurance Expense Rate Year Ended June 30, 2014

	 Health Insurance	lr	Dental surance		Total
Rate Year Weighted Average Premium (1)	\$ 16,937	\$	1,017	\$	17,954
Number of Employees (2)	249		249		249
Annual Premiums	\$ 4,217,399	\$	253,195	\$	4,470,594
Less Employee Copayments (3)	 (784,436)		-		(784,436)
NBC Premium Expense	\$ 3,432,963	\$	253,195	\$	3,686,158
Amount per NBC (2)	 3,432,963	***************************************	253,195	***************************************	3,686,158
Adjustment to Rate Year Expense	\$ - ·	\$		\$	-

- (1) Per Schedule WEE-R3.
- (2) Per Schedule WEE-R3.
- (3) Reflects weighted average copayment of 18.6%.

Adjustment to Workers' Compenstion Claims Expense Rate Year Ended June 30, 2014

	 Amount
FY 2012 Workers' CompOld Claims	\$ 62,620
Less: Discontinued Amounts (1)	 (20,374)
Estimated Rate Year Expense	\$ 42,246
Amount per NBC (2)	 42,246
Adjustment to Rate Year Expense	\$ -

- (1) Per response to DIV. 1-10.
- (2) Per Schedule WEE-R4.

Adjustment to Biosolids Disposal Costs Rate Year Ended June 30, 2014

	7/1/2013 to 12/31/2013		1/1/2014 to 6/30/2014		Total
Field's Point-Dry Tons (1)		3,966	3,966		7,932
Bucklin Point-Dry Tons (1)		1,056	1,056		2,112
Total Biosolids for Disposal-Dry Tons		5,022.0	5,022.0		10,044
Rate per Ton (2)	\$.	425.72	\$ 433.83		
Biosolids Disposal Costs	\$	2,137,966	\$ 2,178,694		\$ 4,316,660
Amount per NBC (1)					4,316,660
Adjustment to Rate Year Expense				-	\$

Notes:

- (1) Per Schedule WEE-R5.
- (2) Rates caluclated as follows:

Disposal rate for Calendar Year 2012	\$ 417.77
Increase in CPI for Boston Area from November 2011 to November 2012	 1.019
Disposal rate for Calendar Year 2013 (3)	\$ 425.72
Projected increase in CPI-U from 4Q12 to 4Q13 per Blue Chip Econmic Indicators dated 1/10/2013	 1.0190
Disposal rate for Calendar Year 2014	\$ 433.83

(3) Matches actual rate per response to DIV. 2-5.

Adjustment to Maintenance & Service Agreement Costs Rate Year Ended June 30, 2014

		Amount
Rate Year Expense per Division based on NBC Rebuttal (1)	\$	1,007,602
Amount per NBC (1)	***************************************	1,007,602
Adjustment to Rate Year Expense	\$	-

Notes:

(1) Per Schedule WEE-R6.

Adjustment to Natural Gas Costs to Reflect National Grid Gas Supply Costs for the Rate Year Rate Year Ended June 30, 2014

Annual Therms (1)	GCR Rate Per NBC (1)	GCR Rate per Division (2)	Supply Cost Per NBC (1)	Supply Cost per Division
11.01.110 (1)				
38 440	\$ 0.62400	\$ 0.58692	\$ 23,992	\$ 22,566
				50,330
and the second s			· ·	17,843
			*,	23,293
30,000	0.67250	0.03042	24,000	23,293

6.350	0.67250	0.63542	4,270	4,035
·	0.67250	0.63542	•	21,112
2.5		0.63542	•	41,469
30,33	0.0		,	
13,291	0.67250	0.63542	8,938	8,445
40.077	0.07050	0.03540	40 405	10.004
19,977	0.67250	0.63542	13,435	12,694
16,113	0.67250	0.63542	10,836	10,239
336,616			\$ 224,509	\$ 212,028
				\$ (12,482)
				Ψ (12,402)
				(386)
Costs				<u>\$ (12,868)</u>
	Therms (1) 38,449 79,208 28,081 36,658 6,350 33,226 65,263 13,291 19,977 16,113	Therms (1) Per NBC (1) 38,449 \$ 0.62400 79,208 0.67250 28,081 0.67250 36,658 0.67250 6,350 0.67250 33,226 0.67250 65,263 0.67250 13,291 0.67250 19,977 0.67250 16,113 0.67250 336,616	Therms (1) Per NBC (1) Division (2) 38,449 \$ 0.62400 \$ 0.58692 79,208 0.67250 0.63542 28,081 0.67250 0.63542 36,658 0.67250 0.63542 33,226 0.67250 0.63542 65,263 0.67250 0.63542 13,291 0.67250 0.63542 19,977 0.67250 0.63542 16,113 0.67250 0.63542 336,616 0.67250 0.63542	Therms (1) Per NBC (1) Division (2) Per NBC (1) 38,449 \$ 0.62400 \$ 0.58692 \$ 23,992 79,208 0.67250 0.63542 53,267 28,081 0.67250 0.63542 18,884 36,658 0.67250 0.63542 24,653 6,350 0.67250 0.63542 22,344 65,263 0.67250 0.63542 22,344 65,263 0.67250 0.63542 43,889 13,291 0.67250 0.63542 8,938 19,977 0.67250 0.63542 13,435 16,113 0.67250 0.63542 10,836 336,616 \$ 224,509

- (1) Per Schedule WEE-R7 Detail.
- (2) Reflects Composite of following National Grid 2013 GCR rate for 4 Months and 2014 GCR rate for 8 months:

	Н	igh Load			
		Factor	/	All Other	
2013 GCR Rate	\$	0.62400	\$	0.67250	
Expected Reduction		0.05563		0.05563	(per page 2 of this schedule)
2014 GCR Rate	\$	0.56837	\$	0.61687	
Weighted Rate	\$	0.58692	\$	0.63542	

Analysis of Expected Reduction in National Grid Gas Supply Costs for the 2014 GCR Period

	Volume								
	Forecast	Average Price	of He	dged Dth			2012-13		2013-14
	(Dth)	2012-13		013-14	_		Cost		Cost
•						٠.			
November	2,263,973	\$ 4.5912	\$	4.2661		\$	10,394,353		\$ 9,658,335
December	3,639,909	4.6429		4.2595			16,899,733		15,504,192
January	3,693,950	4.7416		4.1874			17,515,233		15,468,046
February	3,284,612	4.6180		4.0955			15,168,338		13,452,128
March	3,448,137	4.7096		3.9898			16,239,346		13,757,377
April	2,843,609	4.4707		3.7386			12,712,923		10,631,117
May	1,986,560	4.4577		3.8144			8,855,489		7,577,534
June	1,223,024	4.6068		3.7594			5,634,227		4,597,836
July	720,291	4.6961		3.9847			3,382,559		2,870,144
August	652,188	4.7776		3.9877			3,115,893		2,600,730
September	709,898	4.2978		3.9843			3,051,000		2,828,447
October	1,268,633	4.1806		4.1841			5,303,647		 5,308,087
Total	25,734,784					\$	118,272,741		\$ 104,253,974
		Weighted	d Aver	age Price		\$	4.5958		\$ 4.0511
Supply Variable Cos	st Factor =	\$4.6931	X \$	4.0511	1	\$	4.5958	=	\$ 4.1368
Reduction in 2010-1	1 Supply Variab	le Cost per Dth	=	\$4.6931	-	\$	4.1368	=	\$0.55627
Reduction in 2010-1	1 Supply Variab	le Cost per Ther	m =						\$0.05563

Sources: National Grid Semi-Annual Report on Gas Procurment Incentive Plan dated January 31, 2013 and Revised Gas Charge Recovery Filing Dated January 24, 2013, both filed in Docket No. 4346.

Adjustment to Electricity Costs to Reflect Updated Supply Costs and Offset for REC Revenues Rate Year Ended June 30, 2014

	Cost per NBC (1)	Cost per Division (2)	Adjustment
Field's Point Field's Point Tunnel Pump Starion New Operartions Bldg. BNR Facilities Turbines	\$ 1,140,063 710,568 72,381 1,141,598 (708,885)	\$ 1,140,063 710,568 72,381 1,141,598 (708,885)	\$
Bucklin Point	1,155,276	1,155,276	
Interceptor Maintenance	131,948	131,948	-
COB	151,301	151,301	***
Total Electricity Cost	\$ 3,794,253	\$ 3,794,253	\$ -
Less: RECs (3)	-	<u>.</u> ·	<u>-</u>
Plus: Turbine O&M	62,000	62,000	-
Net Electricty Costs	\$ 3,856,253	\$ 3,856,253	\$

- (1) Per WEE-R8 Detail as shown on page 2 of this schedule.
- (2) Per WEE-R8 Detail as shown on page 2 of this schedule.
- (3) Revenues from Sale of RECs of \$355,650 have been included as miscellaneous revenue by NBC and Division as reflected on Schedule TSC-1

Adjustment to Electricity Costs to Reflect Updated Supply Costs and Offset for REC Revenues Rate Year Ended June 30, 2014

DETAIL (1)

				DETAIL (1)					
	800	FP	TPS	New Ops	BNR	Turbines	FP Total	BP	IM
FY 2014 Projected kWh	1,395,500	11,336,000	6,411,600	726,280	11,454,879	(7,113,000)	(7,113,000) 22,815,759	11,221,000	1,029,847
Rates:							,		
Customer Chg.	\$ 825	\$ 825	\$ 825					\$ 825 \$	\$ 1,245
Supply	0.06410	0.06410	0.06410	0.06410	0.06410	0.06410	0.06410	0.06410	0.06410
Avg. Delivery per kWh	0.02955	0.02823	0.03741	0.02823	0.02823	0.02823		0.03051	0.04105
Capacity Chg	\$ 0.00334	\$ 0.00334	\$ 0.00334	\$ 0.00334	\$ 0.00334	\$ 0.00334		\$ 0.00334	\$ 0.00334
									+
Customer Chg.	\$ 006′6 \$	\$ 9,900	\$ 9,900	٠ ج	٠ \$	۔ د	\$ 19,800	006'6 \$	S.
Supply	89,452	726,638	410,984	46,555	734,258	(455,943)	1,462,490	719,266	66,013
Avg. Delivery per kwh	41,235	320,048	239,840	20,505	323,404	(200,820)	702,976	342,408	42,276
Capacity Charge	4,663	37,876	21,423	2,427	38,273	(23,766)	76,233	37,492	3,441
Subtotal	\$ 145,249 \$ 1,		\$ 682,146	\$ 69,486	094,462 \$ 682,146 \$ 69,486 \$ 1,095,935	\$ (680,530)	\$ (680,530) \$ 2,261,499 \$ 1,109,066 \$ 126,670	\$ 1,109,066	\$ 126,670
				1		1000			
Gross Earnings Tax	\$ 6,052 \$		45,602 \$ 28,422 \$ 2,895 \$	\$ 2,895		45,663 \$ (28,355) \$	\$ 94,228 \$	\$ 46,210 \$	8/7'6 \$
Total	\$ 151,301 \$ 1,		\$ 710,568	\$ 72,381	140,063 \$ 710,568 \$ 72,381 \$ 1,141,598 \$ (708,885) \$ 2,355,727 \$ 1,155,276 \$ 131,948	\$ (708,885)	\$ 2,355,727	\$ 1,155,276	\$ 131,948

Note: (1) All amounts per WEE-R8 Detail

Adjustment to Field's Point Chemicals Costs Rate Year Ended June 30, 2014

	Нурс	ochlorite (1)	Bis	sulfate (1)	Total
FY 2011 Gallons		785,597		233,017	
FY 2012 Gallons		450,103	www	193,037	,
Average		617,850		213,027	,
Price Per Gallon (2)	\$	0.5981	\$	1.4615	
Annualized Espense	\$	369,547	\$	311,329	\$ 680,876
Amount per NBC (2)		369,547		311,329	 680,876
Adjustment to Rate Year Expense	\$	<u>-</u>	\$		\$

⁽¹⁾ Gallons per response to DIV. 1-19

⁽²⁾ Per Schedule WEE-R9.

Adjustment to Bad Debt Expense Rate Year Ended June 30, 2014

		Amount
Historical Bad Debt (1) FY 2008 FY 2009 FY 2010 FY 2011	\$	77,534 (15,905) (12,582)
FY 2012 Average Bad Debt over 2008 through 2012	-\$	170,457 43,901
Average Bad Debt in FY 2011 and FY 2012	\$	85,229
Bad Debt Expense per NBC (2)		85,229
Total Adjustment to Bad Debt Expense	\$	

- (1) Per Schedule WEE-3 and Schedule WEE-3 in Docket No. 4205.
- (2) Per Schedule WEE-R10.

Adjustment to Debt Service Expense Rate Year Ended June 30, 2014

Debt Service Associated with:	Amount
Existing Debt plus \$107 million being issued in FY 2013 (1)	\$ 42,062,563
FY 2014 SRF Loan of \$12 million (2)	831,767
Open Market Bonds of \$40 million in FY 2014 (3)	2,000,000
Total Debt Service	\$ 44,894,330
Coverage Requirement at 25%	\$ 11,223,583
Total Debt Service and Coverage	\$ 56,117,913
Amount per NBC (4)	 56,117,913
Adjustment to Rate Year Expense	\$ <u> </u>

- (1) Per Exhibit KG-2 in Division Docket No. D-13-13. Reflects expense for FY 2015.
- (2) Per response to DIV. 1-28. Reflects Expense for FY 2015.
- (3) Based on \$40 million of debt with principal only payments in initial years per response to DIV. 1-28.
- (4) Per Schedule WEE-R11.

Calculation of Uniform Percentage Increase Based on Division Recommended Revenue Increase Rate Year Ended June 30, 2014

Division Recommended Revenue Increase (1)	\$ 7,964,892
Revenues from Services Subject to Increase (2)	
Flat Fees-Residential	\$ 21,790,217
Measured Fees-Residential	25,700,104
Flat Fees-Commercial and Industrial	13,192,676
Measured Fees-Commecial	21,439,959
Measured Fees-Industrial	1,214,544
Total Revenue Subject to Increase	 83,337,501
Uniform Percentage Increase	9.56%

- (1) Per Schedule TSC-1
- (2) Per Schedule TSC-14.

Calculation of Proposed Rates and Proof of Revenues at Present and Proposed Rates Rate Year Ended June 30, 2014

						Revenue		Revenue
	C	Current		Present	Billing	at Present	a	nt Proposed
Flat Face		Rate	Increase	Rates	Units (1)	Rates		Rates
Flat Fees								
Residential	\$	184.63	9.56%	\$ 202.28	118,021	\$ 21,790,217	\$	23,872,794
Commercial & Industrial								
Meter Size								
5/8"	\$	441.00	9.56%	483.00	3,685	1,625,085		1,779,855
3/4"		659.00	9.56%	722.00	1,016	669,544		733,552
1."		1,096.00	9.56%	1,201.00	1,161	1,272,456		1,394,361
1.5"		2,200.00	9.56%	2,410.00	843	1,854,600		2,031,630
2"		3,514.00	9.56%	3,850.00	1,457	5,119,898		5,609,450
3"		6,583.00	9.56%	7,212.00	84	552,972		605,808
4"	1	0,970.00	9.56%	12,018.00	41	449,770		492,738
6"	2	1,949.00	9.56%	24,047.00	52	1,141,348		1,250,444
8"		5,117.00	9.56%	38,473.00	13	456,521		500,149
10"	5	0,482.00	9.56%	55,307.00	1	50,482		55,307
Total Commercial & Indu	ustrial I	Flat Fees			8,353	\$ 13,192,676	\$	14,453,294
Measured Fees								
Residential	\$	2.979	9.56%	3.264	8,627,091	25,700,104		28,158,825
Commercial		4.321	9.56%	4.734	4,961,805	21,439,959		23,489,185
Industrial		2.778	9.56%	3.044	437,201	1,214,544	1	1,330,840
Total Measured Fees						\$ 48,354,608	\$	52,978,850
Other Revenue						\$ 3,010,874	_\$_	3,010,874
Total Revenue						\$ 86,348,375	\$	94,315,812
Target Revenue (2)								94,313,267
Variance							¢	
variance							\$	2,545

- (1) Per Schedule WEE-15
- (2) Per Schedule TSC-1.