BEFORE THE

PUBLIC UTILITIES COMMISSION OF RHODE ISLAND

PROVIDENCE WATER)
SUPPLY BOARD) DOCKET NO. 4406

DIRECT TESTIMONY

OF

THOMAS S. CATLIN

ON BEHALF OF THE
DIVISION OF PUBLIC UTILITIES AND CARRIERS

August 23, 2013



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

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Direct Testimony of Thomas S. Catlin

		Brief Testimony of Thomas S. Carin
1		<u>Introduction</u>
2	Q.	WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS
3		ADDRESS?
4	A.	My name is Thomas S. Catlin. I am a principal with Exeter Associates, Inc. Our
5		offices are located at 10480 Little Patuxent Parkway, Suite 300, Columbia, Maryland
6		21044. Exeter is a firm of consulting economists specializing in issues pertaining to
7		public utilities.
8	Q.	PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.
9	A.	I hold a Master of Science Degree in Water Resources Engineering and Management
10		from Arizona State University (1976). Major areas of study for this degree included
11		pricing policy, economics, and management. I received my Bachelor of Science
12		Degree in Physics and Math from the State University of New York at Stony Brook
13		in 1974. I have also completed graduate courses in financial and management
14		accounting.
15	Q.	WOULD YOU PLEASE DESCRIBE YOUR PROFESSIONAL
16		EXPERIENCE?
17	A.	From August 1976 until June 1977, I was employed by Arthur Beard Engineers in
18		Phoenix, Arizona, where, among other responsibilities, I conducted economic
	Direc	et Testimony of Thomas S. Catlin Page 1

feasibility, financial and implementation analyses in conjunction with utility construction projects. I also served as project engineer for two utility valuation studies.

From June 1977 until September 1981, I was employed by Camp Dresser & McKee, Inc. Prior to transferring to the Management Consulting Division of CDM in April 1978, I was involved in both project administration and design. My project administration responsibilities included budget preparation and labor and cost monitoring and forecasting. As a member of CDM's Management Consulting Division, I performed cost of service, rate, and financial studies on approximately 15 municipal and private water, wastewater and storm drainage utilities. These projects included: determining total costs of service; developing capital asset and depreciation bases; preparing cost allocation studies; evaluating alternative rate structures and designing rates; preparing bill analyses; developing cost and revenue projections; and preparing rate filings and expert testimony.

In September 1981, I accepted a position as a utility rates analyst with Exeter Associates, Inc. I became a principal and vice-president of the firm in 1984. Since joining Exeter, I have continued to be involved in the analysis of the operations of public utilities, with particular emphasis on utility rate regulation. I have been extensively involved in the review and analysis of utility rate filings, as well as other types of proceedings before state and federal regulatory authorities. My work in utility rate filings has focused on revenue requirements issues, but has also addressed service cost and rate design matters. I have also been involved in analyzing affiliate relations, alternative regulatory mechanisms, and regulatory restructuring issues.

1		This experience has involved electric, natural gas transmission and distribution, and
2		telephone utilities, as well as water and wastewater companies.
3	Q.	HAVE YOU PREVIOUSLY TESTIFIED IN OTHER REGULATORY
4		PROCEEDINGS ON UTILITY RATES?
5	A.	Yes. I have previously presented testimony on more than 250 occasions before the
6		Federal Energy Regulatory Commission and the public utility commissions of
7		Arizona, California, Colorado, Delaware, the District of Columbia, Florida, Idaho,
8		Illinois, Indiana, Kentucky, Louisiana, Maine, Maryland, Montana, Nevada, New
9		Jersey, Ohio, Oklahoma, Pennsylvania, Utah, Virginia, and West Virginia, as well as
10		before this Commission. I have also filed rate case evidence by affidavit with the
11		Connecticut Department of Public Utility Control and have appeared as a witness on
12		behalf of the Louisiana Public Service Commission before the Nineteenth Judicial
13		District Court.
14	Q.	ARE YOU A MEMBER OF ANY PROFESSIONAL SOCIETIES?
15	A.	Yes. I am a member of the American Water Works Association (AWWA) and the
16		Chesapeake Section of the AWWA.
17	Q.	ON WHOSE BEHALF ARE YOU APPEARING?
18	A.	I am presenting testimony on behalf of the Division of Public Utilities and Carriers
19		(the Division).
20	Q.	HAVE YOU PREVIOUSLY TESTIFIED ON WATER UTILITY ISSUES
21		BEFORE THIS COMMISSION?
22	A.	Yes, I have been asked by the Division to address water utility issues on numerous
23		occasions. I testified on revenue requirement, cost of service and/or rate design
24		issues in Newport Water Division, Docket Nos. 2029, 2985, 3457, 3578, 3675, 3818
25		4025 and 4243; Providence Water Supply Board, Docket Nos. 2022, 2048, 2304,

1		2961, 3163, 3446, 3684, 3832 and 4061; Kent County Water Authority, Docket Nos.
2		2098 and 3942, Woonsocket Water Department, Docket Nos. 2099 and 2904; United
3		Water Rhode Island, Inc., (formerly Wakefield Water Company), Docket Nos. 2006
4		2873 and 4255; and Pawtucket Water Supply Board, Docket Nos. 3193, 3378, 3497,
5		3674 and 4171.
6	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?
7	A.	Exeter Associates was retained by the Division to assist in the evaluation of the
8		General Rate Filing submitted by the Providence Water Supply Board (Providence
9		Water or PWSB) on March 29, 2013. This testimony presents my findings and
10		recommendations regarding the overall revenue increase to which Providence Water
11		is entitled. My associate, Jerome D. Mierzwa, addresses cost allocation and rate
12		design issues.
13	Q.	HAVE YOU PREPARED SCHEDULES TO ACCOMPANY YOUR
14		TESTIMONY?
15	A.	Yes. I have prepared Schedules TSC-1 through TSC-14. Schedule TSC-1 provides a
16		summary of revenues and expenses under present and proposed rates. Schedules
17		TSC-2 through TSC-14 present the adjustments that I am recommending be made to
18		Providence Water's claimed revenues and operating expenses.
19		
20		Summary and Recommendations
21	Q.	PLEASE SUMMARIZE THE RATE RELIEF REQUESTED BY
22		PROVIDENCE WATER IN ITS FILING.
23	A.	As discussed in the testimony of Providence Water witness Harold J. Smith,
24		Providence Water is seeking an increase in revenues of \$14,619,888, which
25		represents an overall revenue increase of 24.3 percent. To develop its claim,

1		Providence Water utilized the results for fiscal year (FY) 2012 as the test year
2		Providence Water then adjusted the test year cost of service to reflect changes to
3		become effective for a calendar year (CY) 2014 rate year.
4	Q.	PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS.
5	A.	As shown on Schedule TSC-1, I have determined Providence Water's overall revenue
6		requirement to be \$69,646,380. This represents an increase over revenues at present
7		rates of \$9,558,892. The revenue increase that I have identified is \$5,060,996 less
8		than the revenue increase of \$14,619,888 requested by Providence Water. 1 This
9		difference is the result of the adjustments to PWSB's claimed revenues and operating
10		expenses that are summarized on Schedule TSC-2.
11	Q.	WHAT TIME PERIODS HAVE YOU UTILIZED IN MAKING YOUR
12		DETERMINATION OF PROVIDENCE WATER'S REVENUE
13		REQUIREMENTS?
14	A.	Consistent with Providence Water's filing, I have utilized a test year ended
15		June 30, 2012 and a rate year ending December 31, 2014 as the basis for determining
16		Providence Water's revenue requirements and the revenue increase necessary to
17		recover those requirements.
18	Q.	HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?
19	A.	The remainder of my testimony is organized into sections corresponding to the issue
20		or topic being addressed. These sections are set forth in the Table of Contents for
21		this testimony.

¹ The schedules accompanying Providence Water witness Smith's testimony show a revenue deficiency of \$14,618,141. Due to rounding, the proposed rates would generate a revenue increase of \$14,619,888.

Salaries and Wages

2	Q.	PLEASE	EXPLAIN	HOW	PROVIDENCE	WATER	DEVELOPED	ITS
3		CLAIME	D ALLOWA	NCE F	OR RATE YEAR	SALARI	ES AND WAGE	ES.

To develop its claimed rate year allowance for salaries and wages, Providence Water first calculated the annualized wages for the 234 existing full-time employees based on the payroll for the week ended November 18, 2012. To this amount, Providence Water added the annual salaries of the five employees on workers' compensation, and the annual salaries for eleven vacant positions. Next, Providence Water added the annual longevity pay and the annual amounts paid to part-time employees, rain gauge keepers and Board members, to determine total annualized payroll in FY 2013. Finally, Providence Water increased the FY 2013 total by 4.545 percent to reflect the compound effect of a 3.0 percent wage increase on July 1, 2013, and one-half of the 3.0 percent increase scheduled for July 1, 2014 to determine wages for the rate year ending December 31, 2014.

Q. DO YOU AGREE WITH PROVIDENCE WATER'S RATE YEAR WAGE CLAIM?

No. I have identified several issues with regard to Providence Water's claim. First, by ignoring normal employee turnover and including wages for its eleven vacant positions, Providence Water has overstated rate year salaries and wages. In response to Division data request Set 4, question 1 (DIV 4-1), Providence Water indicated that seven of the eleven vacant positions as of November 2012 were filled by June 30, 2013. However, despite this, the number of full-time permanent employees actually declined from 239 as of November 2012 to 235 as of June 2013 due to other positions becoming vacant. In fact, as shown in response to DIV 4-6, the number of permanent full-time employees has been at 239 or less in every month in the last two

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years except in August 2011 (241), September 2011 (240)	, October	2011 (241),	and
October 2012 (240).			

Second, Providence Water has annualized the wages for existing employees by multiplying total payroll, including overtime, for the week of November 18, 2012 by 52. Depending on the level of overtime during that week, annual overtime expense could be overstated or understated because overtime varies from month to month and week to week.

Third, inclusion of the full annual salaries of the employees receiving workers' compensation creates a potential double-count of these salaries. Historically, PWSB has had third-party insurance for workers' compensation which paid the salaries of any employee on workers' compensation leave, and those salaries were not part of Providence Water's payroll. Currently, Providence Water is self-insured for workers' compensation claims up to \$350,000 per employee. Therefore, if the salaries of these workers are included in payroll, they must be excluded from workers' compensation expense.

Finally, Providence Water's calculation of annualized wages appears to exclude the wages paid to temporary seasonal employees. Because these employees are only employed in the summer months, the payroll for the week of November 18, 2012 used to annualize wages would not include wages for those employees.

- Q. WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO PROVIDENCE WATER'S CLAIM FOR RATE YEAR SALARIES AND WAGES?
- A. I am proposing to utilize PWSB's actual wages for FY 2013 as the starting point for my determination of rate year salaries and wages. These wages reflect actual

employee levels, thereby accounting for the effects of employee turnover, as well
including longevity pay, actual overtime, and temporary, seasonal employee wages. I
have then adjusted actual FY 2013 wages to reflect three changes. First, consistent
with my determination of workers' compensation expense discussed subsequently, I
have adjusted FY 2013 salaries and wages to include the amounts that would have
been paid if all employees were on the payroll and no employees received workers'
compensation. Second, I have further increased payroll to include three additional
employees. Finally, I have adjusted payroll to account for effects of the wage
increase of 3 percent on July 1, 2013, and one-half the annual effect of an additional 3
percent increase on July 1, 2014.

- 11 Q. PLEASE EXPLAIN YOUR ADJUSTMENT TO INCLUDE WAGES FOR
 12 THREE EMPLOYEES IN EXCESS OF THOSE IN FY 2013.
- 13 A. I have included wages for three new positions because Providence Water has
 14 indicated it is striving to reduce the number of vacant positions on its Staff. I based
 15 the increase of three employees on two factors. First, the average number of full16 time, permanent employees increased from 234 in FY 2012 to 237 in FY 2013. An
 17 increase of three employees for the rate year is consistent with this increase. Second,
 18 240 is the highest number of employees that Providence Water had during FY 2013,
 19 which is three employees above the FY 2013 average.
- 20 Q. HAVE YOU PREPARED A SCHEDULE WHICH SHOWS THE
 21 CALCULATION OF YOUR RECOMMENDED LEVEL OF SALARIES
 22 AND WAGES FOR THE RATE YEAR?
- A. Yes. Schedule TSC-3 presents my recommendation regarding the appropriate level of salaries and wages for the rate year based on FY 2013 salaries and wages per books, plus wages for employees on workers' compensation and three additional

1		employees. As shown there, I am recommending a rate year allowance for salaries
2		and wages of \$14,282,574, which is \$475,150 less than Providence Water's claim.
3		
4		Payroll Clearing
5	Q.	WHAT IS PAYROLL CLEARING?
6	A.	Payroll clearing represents the capitalized labor associated with Providence Water
7		construction projects. For investor-owned utilities that earn a return on rate base,
8		capitalized labor becomes part of the capital investment which the utility is allowed to
9		depreciate and earn a return. For Providence Water and other municipal utilities for
10		which revenue requirements are determined on a cash basis, capitalized labor costs
11		must be reimbursed from the Infrastructure Replacement (IFR) fund or another
12		capital fund because Providence Water's cost of service does not include depreciation
13		of, and a return on, rate base.
14	Q.	HOW DID PROVIDENCE WATER DETERMINE THE AMOUNT OF
15		PAYROLL CLEARING THAT WILL BE REIMBURSED FROM THE IFR
16		OR OTHER CAPITAL FUND FOR THE RATE YEAR?
17	A.	Providence Water included a credit or off-set to salaries and wages for payroll
18		clearing equal to the payroll clearing in the FY 2012 test year. As shown on Schedule
19		HJS-A1, this credit is \$798,115. However, in response to DIV 1-10, Providence
20		Water agreed that this amount should be adjusted to reflect wage increases after FY
21		2012
22	Q.	WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO PAYROLL
23		CLEARING?
24	A.	I am proposing to adjust payroll clearing to reflect the effect of the increases in wage
25		rates that occurred after the test year ended June 30, 2012 on July 1, 2012, July 1,

1		2013, and one-half of the increase scheduled for July 1, 2014. As shown on Schedule
2		TSC-4, this adjustment increases payroll clearing and reduces test year expenses by
3		\$61,306.
4		
5		Overhead Rate Applied
6	Q.	WHAT IS OVERHEAD RATE APPLIED?
7	A.	Similar to payroll clearing, overhead rate applied represents capitalized overheads
8		that are attributable to construction projects.
9	Q.	HAS PROVIDENCE WATER TREATED THESE CAPITALIZED
10		OVERHEADS IN THE SAME MANNER AS CAPITALIZED WAGES
11		(PAYROLL CLEARING)?
12	A.	No. Unlike payroll clearing or capitalized labor, Providence Water has not treated
13		overhead rate applied as being reimbursed from the IFR fund or another capital fund.
14		Instead, Providence Water has treated these capitalized overheads as a normal O&M
15		expense.
16	Q.	HAS PROVIDENCE WATER TREATED CAPITALIZED BENEFITS AS
17		REIMBURSED FROM THE IFR OR OTHER CAPITAL ACCOUNT IN
18		PRIOR RATE CASES?
19	A.	Yes. In response to DIV 4-2, Providence Water indicates that overhead rate applied
20		was not treated as reimbursed from the IFR fund in Docket No. 3832. However, in
21		Providence Water's last rate case in Docket No. 4061, and in Docket Nos. 3446 and
22		3684, the two cases prior to Docket No. 3832, both capitalized labor and capitalized
23		overheads were reimbursed from the IFR or other capital fund.
24	Q.	HOW ARE YOU PROPOSING TO TREAT OVERHEAD RATE APPLIED
25		AMOUNTS?

amounts are capitalized costs, not O&M expenses, and is consistent with treatment of capitalized wages and the treatment of capitalized overheads in cases other than Docket No. 3832.	1	A.	I am proposing to treat overhead rate applied amounts as eligible for reimbursement
treatment of capitalized wages and the treatment of capitalized overheads in cases other than Docket No. 3832.	2		from the IFR fund or capital funds, as applicable. This approach recognizes these
5 cases other than Docket No. 3832.	3		amounts are capitalized costs, not O&M expenses, and is consistent with the
	4		treatment of capitalized wages and the treatment of capitalized overheads in prior
4 O HOW HAVE VOIL DETERMINED THE AMOUNT OF CARITAL I	5		cases other than Docket No. 3832.
0 Q. HOW HAVE TOO DETERMINED THE AMOUNT OF CAPITALL	6	Q.	HOW HAVE YOU DETERMINED THE AMOUNT OF CAPITALIZED

6 Q. HOW HAVE YOU DETERMINED THE AMOUNT OF CAPITALIZED

7 OVERHEADS TO BE REIMBURSED FROM CAPITAL FUNDS FOR THE

8 RATE YEAR?

During the FY 2012 test year, overhead rate applied amounts totaled \$1,202,719. These amounts include both fringe benefits, which are a percentage of labor and a portion of the Administration, Finance, Support and Engineering costs of Providence Water. To estimate the rate year level of capitalized overheads, I have escalated the test year overheads applied by the same factor as payroll clearing. As discussed subsequently, this is the inflation factor from the FY 2012 test year to the CY 2014 rate year that I am recommending. As shown on Schedule TSC-5, I have estimated the capitalized overheads to be reimbursed from the IFR or capital fund, and excluded from O&M expense, to be \$1,295,104.

ARE YOU PROPOSING TO INCREASE IFR OR OTHER CAPITAL FUNDING TO ACCOUNT FOR THE ADDITIONAL AMOUNTS TO BE USED TO REIMBURSE OVERHEADS APPLIED?

No. As shown on Schedule HJS-S9C, Providence Water projects that it will have a balance of \$3.1 million in the IFR fund as of June 30, 2014, and that balance will grow to over \$7.5 million by June 30, 2015. In addition, Schedule HJS-S9A shows that Providence Water also projects a surplus of over \$4.6 million in the Capital Fund (used to pay for cash funded projects) as of June 30, 2015. Hence, there will be more

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1	than sufficient monies available to reimburse overheads applied during the rate year
2	and beyond.

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Benefits Expense

Q. WHAT ADJUSTMENTS HAVE YOU MADE TO PWSB'S PROJECTION
 OF RATE YEAR BENEFITS EXPENSE?

I have made five adjustments to Providence Water's projection of benefits expense for the rate year. First, I have revised the estimate of Union Combined benefits expense to eliminate the projected 4.23 percent increase included by Providence Water based on the response to DIV 1-18 that stated the increase should be zero percent. Second, I have included a 37.7 percent increase in test year Union Pension expense instead of the 41.21 percent increase included by PWSB, again as provided in response to DIV 1-18. Third, I have revised City Retirement expense to reflect the updated cost provided in response to DIV 1-20. Fourth, for those items that Providence Water escalated for inflation, I have reduced the inflation rate from 6.38 percent as used by PWSB to 4.66 percent, consistent with my recommendation regarding the appropriate inflation rate, as discussed subsequently. Finally, I have revised the projected amounts for medical insurance, employee co-pays, and dental insurance to reflect actual premiums for FY 2014.

Q. COULD YOU PROVIDE ADDITIONAL DETAILS REGARDING HOW YOU PROJECTED MEDICAL AND DENTAL INSURANCE COSTS?

Yes. I used the response to COM 1-11 and 1-21 to identify Providence Water's medical (Blue Cross) and dental (Delta Dental) premiums for FY 2014. I adjusted the total premiums provided by Providence Water in COM 1-11 to exclude the premiums for vacant positions in excess of those needed to match my recommendation to allow

1		for 240 full-time, permanent employees. I would note that in determining medica
2		insurance costs, I separated the cash payments made to employees who do not accep
3		healthcare, and updated the rate year amount included by Providence Water for these
4		payments instead of applying an inflation factor to the test year payments.
5	Q.	DID YOU MAKE AN ADJUSTMENT TO MEDICAL AND DENTAL
6		INSURANCE COSTS TO REFLECT AN INCREASE IN PREMIUMS
7		FROM FY 2014 TO CY 2014 LEVELS BASED ON HISTORICAL
8		TRENDS?
9	A.	No. As noted by Mr. Smith in his direct testimony, the City of Providence made
10		changes to its health insurance plans so that current premiums are not directly
11		comparable to historical premiums. In addition, changes in the number of employees
12		and the mix of employees taking family versus single coverage have a material effect
13		on the increase in costs from FY 2012 to FY 2014 that further make the change over
14		that time period unusable for estimating future increases.
15	Q.	HAVE YOU PREPARED A SCHEDULE SHOWING YOUR
16		ADJUSTMENT TO EMPLOYEE BENEFITS?
17	A.	Yes. Schedule TSC-6 presents my estimate of rate year benefits expense after
18		reflecting the adjustments above. As shown there, I have projected benefits expense
19		to be \$8,224,746, which is an increase of \$580,214 compared to Providence Water's
20		rate year claim.
21		
22		<u>Inflation Adjustment</u>
23	Q.	PLEASE SUMMARIZE THE ADJUSTMENT THAT PROVIDENCE
24		WATER MADE FOR INFLATION.

A.	For those expenses that were not separately adjusted from test year to rate year levels
	Providence Water applied an escalation factor of 6.38 percent based on 2.5 percent
	per year inflation for two and one-half years.

Q. WHAT REVISIONS ARE YOU PROPOSING TO THIS CLAIM?

I am proposing two revisions to Providence Water's adjustment for inflation. First, the 2.5 percent per year inflation rate used by Providence Water was based on the historical increase in the Consumer Price Index (CPI) from 2010 to 2012. I am proposing to revise the escalation factor to reflect expected inflation from FY 2012 to CY 2014 of 4.695 percent. I have based this on the average projected CPI for 2014 as identified by Blue Chip Economic Indicators dated August 10, 2013 compared to the average CPI for the four quarters ended June 2012.

The second revision I am proposing to make to Providence Water's inflation adjustment is to exclude purchased power costs from the expense to which an escalation factor is applied. Total purchased power costs and fuel for power purchase costs have shown no upward trend over the last three years, varying from \$1,300,559 in FY 2010 to \$1,474,835 in FY 2011 to \$1,361,928 in the FY 2012 test year. Moreover, Providence Water has an energy supply contract with the League of Cities and Towns that is in effect from 2011 through 2015 that will ensure the supply component of the costs will not increase. Therefore, purchased power costs should not be escalated for inflation.

Q. WHAT IS THE EFFECT OF THE REVISIONS YOU HAVE MADE TO PROVIDENCE WATER'S INFLATION ADJUSTMENT?

As shown on Schedule TSC-7, my adjustments to revise the inflation rate and exclude purchase power costs from the inflation base reduce Providence Water's adjustment by \$170,630.

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1		Bad Debt Expense
2	Q.	WHAT CONCERN DO YOU HAVE WITH REGARD TO PWSB'S
3		CLAIMED BAD DEBT EXPENSE FOR THE RATE YEAR?
4	A.	Providence Water applied an inflation factor of 6.376 percent to test year expense of
5		\$445,333 to determine its claim for rate year bad debt expense of \$473,727. This
6		proposal is inconsistent with Providence Waters experience which reveals that bad
7		debt experience varies from year to year and is not a function of inflation. Over the
8		past four years, Providence Water's bad debt expense has varied from \$720,206 in
9		FY 2010, to \$(524,135) in FY 2011 (negative indicating the recovery or reversal of
10		prior years' bad debt), to \$445,333 in FY 2012 and to \$(1,320,107) for FY 2013.
11	Q.	WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO
12		PROVIDENCE WATER'S CLAIMED EXPENSE?
13	A.	As shown on Schedule TSC-8, the average level of bad debt expense over the period
14		FY 2010 through FY 2013 has been negative. Accordingly, I am proposing to
15		eliminate Providence Water's claim for bad debt expense, thereby reducing rate year
16		expense by \$473,727. This adjustment is shown on Schedule TSC-8.
17		
18		<u>Insurance Expense</u>
19	Q.	HOW DID PROVIDENCE WATER DEVELOP ITS CLAIM FOR
20		INSURANCE EXPENSE?
21	A.	Providence Water's filing includes an allowance for insurance expense that was
22		determined by applying an escalation factor of 1.0638 to test year insurance based on
23		its estimate of inflation of 2.5 percent per year. In his direct testimony, Providence
24		Water witness Smith indicated that this estimate would be updated when bids for its
25		new insurance contracts were received.

Q.	PLEASE EXPLAIN YOUR ADJUSTMENTS TO INSURANCE EXPENSE
	FOR THE RATE YEAR.

I have adjusted insurance expense to reflect the updated information provided by Providence Water. I have included \$1,018,753 for property and casualty insurance to reflect the FY 2014 premiums based on the recently received bids. As can be seen from Schedule TSC-9, property and casualty premiums have not increased in recent years and I have used the FY 2014 premiums as representative of the rate year.

Beginning in FY 2013, Providence Water became currently self-insured for workers' compensation claims of up to \$350,000 per incident. This was necessary due to poor claims experience that PWSB has taken aggressive measures to correct. (For example, over the course of FY 2013, the number of employees on workers' compensation declined for 10 to 3.) To account for rate year workers' compensation insurance costs, I have included the FY 2014 premium of \$443,542 being paid to The Hartford for plan administration and excess coverage. I have added \$250,000 to this amount to cover costs for medical claims and other related costs. As noted previously, I have included the wages for all employees in salaries and wages and therefore have not included any amounts for salaries and wages paid as workers' compensation. I would note that to the extent that any workers' compensation is paid to employees in lieu of salary, those amounts should not be treated as workers' compensation expense unless the salary for that employee is credited to the insurance reserve.

As far as the remaining components of insurance expense, I have based the allowance for injuries and damages on the average claims for FY 2011, FY 2012 and

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FY 2013.² I have based the amounts for safety supplies and program expense on the expenses incurred in the test year adjusted for inflation. As shown on Schedule TSC-9, my recommended allowance for insurance expense is \$282,043 less than Providence Water's claim. This difference is primarily due to the change in workers' compensation insurance.

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Chemicals and Sludge Handling

Q. PLEASE SUMMARIZE PROVIDENCE WATER'S REQUEST FOR
 FUNDING ITS CHEMICALS AND SLUDGE MAINTENANCE FUND.

- Providence Water is proposing to increase the annual contribution to the chemicals and sludge maintenance fund by \$3,000,000 from \$2,458,942 to \$5,458,942. This increase is designed to recover projected rate year chemical and sludge handling costs of \$4,773,881, plus provide an additional fund contribution of \$685,061 to be used to recover a projected shortfall in the fund balance. This shortfall was projected to occur in FY 2013 due to a known increase in sludge handling costs, and projected increases in chemical costs due to the increased usage discussed by Providence Water witness Paul Gadoury and further detailed in response to DIV 1-25.
- 18 Q. DID THE PROJECTED INCREASE IN CHEMICAL COSTS PROJECTED

 19 FOR FY 2013 OCCUR?
- A. No. Providence Water projected that the quantities of all of the water treatment chemicals that it utilizes would increase in FY 2013 and beyond compared to FY 2012. However, with the exception of chlorine use, actual chemical use was less in FY 2013 than in FY 2012.

The FY 2013 amount was provided in late May and does not include a fu

² The FY 2013 amount was provided in late May and does not include a full year of experience. To the extent that adddtional claims were paid during FY 2013, it would be appropriate to update the average to include those additional claims paid.

1	Q.	HOW ARE YOU PROPOSING TO DETERMINE CHEMICAL COSTS!
2	A.	Schedule TSC-10 presents a comparison of Providence Water's projected chemical
3		use with the actual quantities utilized in FY 2012 and FY 2013. As noted above, FY
4		2013 chemical use was not only below PWSB's projections, it was below FY 2012
5		usage for all chemicals other than chlorine. To be conservative, I am proposing to
6		base the chemical costs included in determining the restricted account funding on the
7		higher of the quantity utilized in FY 2012 or FY 2013. I have then multiplied these
8		quantities by the unit prices for the rate year to determine annual chemical costs of
9		\$2,499,322. Adding the costs of the new sludge maintenance costs of \$1,700,000 per
10		year results in total chemical and sludge handling costs of \$4,199,322.
11	Q.	HOW DO THE CHEMICAL COSTS YOU HAVE INCLUDED COMPARE
12		TO THOSE THAT WOULD HAVE RESULTED IF YOU HAD BASED
13		QUANTITIES ON A TWO-YEAR AVERAGE?
14	A.	Had a two-year average for the quantities been utilized, chemical costs would have
15		been \$2,241,843, a reduction of \$257,479 compared to my recommendation.
16	Q.	ARE YOU PROPOSING TO INCLUDE ANY AMOUNT ABOVE
17		PROJECTED CHEMICAL AND SLUDGE HANDLING COSTS TO FUND
18		A SHORTFALL IN THE RESTRICTED ACCOUNT?
19	A.	Yes. Based on the FY 2013 chemical usage data and prices provided in discovery, l
20		have estimated that actual FY 2013 chemical costs were approximately \$2.06 million.
21		This is approximately \$1.13 million less than Providence Water's estimate of FY
22		2013 costs. Based on the sources and uses of funds shown on Schedule HIS-S9G,
23		Providence Water should have ended FY 2013 with a small positive balance in the
24		Chemical and Sludge Maintenance fund. However, if FY 2014 funding was based on
25		including only the amount necessary to cover estimated costs, the restricted fund

1		balance would be approximately \$300,000 negative at the end of FY 2014.
2		Therefore, I am proposing to include an additional \$250,000 in reserve funding. This
3		will result in \$375,000 in additional funding in FY 2014 and FY 2015 so that the
4		negative balance will be eliminated by the end of FY 2015. (Because the new
5		funding will not begin until the second half of FY 2014, only \$125,000 will be
6		collected in FY 2014.)
7	Q.	WHAT IS YOUR RECOMMENDATION WITH REGARD TO FUNDING
8		OF THE CHEMICAL AND SLUDGE HANDLING RESTRICTED

9 ACCOUNT?

> As shown on Schedule TSC-10, I am proposing to include a funding allowance of \$4,450,000 based on the estimate of chemical costs I have developed. This represents an increase of \$1,991,058 compared to the current funding allowance, but is \$1,008,942 less than Providence Water's requested funding allowance.

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Property Tax Expense

PLEASE SUMMARIZE HOW PROVIDENCE WATER DEVELOPED ITS Q. CLAIM FOR RATE YEAR PROPERTY TAX EXPENSE.

Providence Water based its rate year property tax claim on the average of its projection of taxes for each municipality in FY 2014 and FY 2015. With the exception of Scituate and Gloucester, Providence Water projected FY 2014 and FY 2015 property taxes by escalating its FY 2013 assessment from each municipality by the four percent per year statutory maximum. The FY 2014 and FY 2015 taxes for Gloucester and Scituate were based on their tax treaties with Providence Water. In the case of Gloucester, the tax treaty includes four percent per year increases over FY 2013 for FY 2014 and FY 2015. For Scituate, the property tax treaty called for Providence Water to pay adjusted taxes in FY 2009 through FY 2013 and return to non-adjusted tax levels in FY 2014. Providence Water assumed that FY 2014 and FY 2015 taxes would include the full four percent maximum increases.

4 Q. HOW ARE YOU PROPOSING TO DETERMINE RATE YEAR
5 PROPERTY TAX EXPENSE?

Consistent with Providence Water's approach, I am proposing to utilize the average projected property tax expense for FY 2014 and FY 2015 to estimate property tax expense for the CY 2014 rate year. However, since the time Providence Water filed its rate case, actual FY 2014 property tax bills have been received.³ Therefore, I have used these amounts for FY 2014.

To estimate FY 2015 property taxes, I have escalated the actual taxes for FY 2014 based on recent experience. For Scituate, which accounts for more than 85 percent of Providence Water's total property tax expense, the response to DIV 1-11 indicates that the tax rate has increased by 2.27 percent, zero percent, and one percent over the last three years. Based on this, I have included a conservative two percent increase from FY 2014 to FY 2015. For Gloucester, I have utilized the tax treaty amount for FY 2015, which reflects a four percent increase compared to FY 2014. For the remaining municipalities, I looked at the overall increase over the last several years. From FY 2011 to FY 2014, the overall increase in the combined property taxes paid to municipalities other than Scituate and Gloucester was 1.10 percent. This is consistent with the increase from FY 2013 to FY 2014 of 1.14 percent. However, to again be conservative, I have included an increase of two percent from FY 2014 to FY 2015.

A.

³ The exceptions are the Harmony and Chepachet Fire Districts. The combined property taxes for these two small fire districts totaled \$297 for FY 2013, and I have assumed these taxes would increase by four percent for purposes of projecting their FY 2014 taxes.

1	Q.	HAVE YOU PREPARED A SCHEDULE SHOWING THE EFFECT OF
2		YOUR UPDATED ESTIMATES OF PROPERTY TAXES?
3	A.	Yes. This information is presented on Schedule TSC-11. As shown there, my
4		projection of property tax expense is \$252,919 less than Providence Water's
5		projection.
6		
7		Unidirectional Flushing Program
8	Q.	WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO THE
9		COSTS OF THE UNIDIRECTIONAL FLUSHING PROGRAM?
10	A.	In response to DIV 1-30, Providence Water provided an update of the costs of its new
11		unidirectional flushing program. According to that response, the field operations
12		costs are now estimated to be \$290,000 instead of its original estimate of \$380,000. I
13		have reflected this reduction in costs of \$90,000 on Schedule TSC-12.
14		
15		Regulatory and Rate Case Expense
16	Q.	HOW DID PROVIDENCE WATER DEVELOP ITS REGULATORY AND
17		RATE CASE EXPENSE CLAIM?
18	A.	Providence Water's claimed regulatory and rate case expense consists of three
19		primary elements: the costs of the current rate case; its allocated share of PUC
20		expenses; and the costs of various other regulatory proceedings. For the current rate
21		case, Providence Water estimated total costs of \$233,622 and has proposed to
22		amortize those costs over two years. The amount included for Providence Water's
23		proportionate share of PUC expenses was based on the FY 2013 assessment. For the
24		costs of other proceedings, Providence Water generally escalated FY 2012 costs by
25		five percent. It also added \$6,500 for costs related to a bond filing with the Division.

1	Q.	ARE YOU PROPOSING ANY ADJUSTMENTS TO PROVIDENCE
2		WATER'S CLAIM FOR REGULATORY AND RATE CASE EXPENSE?
3	A.	Yes. Providence Water's claimed costs include costs associated with two prior rate
4		proceedings: Docket 40611-Conservation Rate Filing and the hydrant fee filing.
5		Those costs are not ongoing and are not incremental to the cost of this proceeding.
6		To the extent these amounts represent the amortization costs of those prior
7		proceedings, the amortization should be complete prior to the rate year in this case.
8		Therefore, I have eliminated these amounts which total \$17,626, as shown on
9		Schedule TSC-13.
10		
11		Miscellaneous Expenses
12	Q.	PLEASE EXPLAIN YOUR CONCERN WITH REGARD TO
13		MISCELLANEOUS EXPENSES.
14	A.	Based on my review of the response to Comm 1-33, I have identified a number of test
15		year expense items that may not be appropriately included in Providence Water's rate
16		year expenses. This includes costs that are either not properly recovered from
17		ratepayers and/or costs that are one-time expenses that will not be incurred again in
18		the rate year.
19	Q.	WOULD YOU PLEASE SUMMARIZE THE MISCELLANEOUS
20		EXPENSES ABOUT WHICH YOU HAVE CONCERNS?
21	A.	Yes. First, Water Treatment Miscellaneous Expenses (Account 67530) include an
22		assessment of \$2,775 from the Rhode Island Department of Environmental
23		Management for an air quality violation and \$17,937 for hazardous waste disposal
24		and containment paid to Triumvirate Environmental. These would appear to be

expenses that are not properly recovered from ratepayers as well as being	ıg non-
recurring expenses.	

Customer Accounts related Miscellaneous Expenses (Account 67570) include separate entries for \$3,620 and \$599 for customer refunds. These refunds appear to be related to water service and, as such, are not properly included in rate year operating expenses because these amounts represent an adjustment to revenues, not expenses, and rate year revenues are based on a multi-year average of historical sales volumes.

Administrative and General Miscellaneous Expenses (Account 67580) include four entries which appear to be one-time, non-recurring items which may not be properly included in rate year expenses. These include \$28,000 paid to Zandar for software conversion; \$125,528 paid to Adaptive Minds for billing software/Oracle support; \$35,000 paid to Sansoucy for appraisal service; and \$69,933 paid to Partridge, Snow and Hahn for legal services/strategic plan.

Q. HOW ARE YOU PROPOSING TO TREAT THE MISCELLANEOUS EXPENSE ITEMS DISCUSSED ABOVE?

Because of the timing of the response to Comm 1-33, insufficient time was available prior to the filing of this testimony to conduct follow-up discovery to obtain more details. For purposes of developing my initial recommendation on behalf of the Division, I have excluded all of the costs that I have discussed above from rate year expenses. I am prepared to reevaluate this recommendation if Providence Water provides information in discovery or rebuttal testimony that demonstrates why these costs should be recovered from ratepayers.

Schedule TSC-14 provides the calculation of my adjustment to remove the Miscellaneous Expenses discussed previously. I would note that all Miscellaneous

A.

Expenses were included in the overall pool of costs that was adjusted from test year to rate year levels by applying an inflation factor. Therefore, in developing my adjustment, I have applied the inflation factor that I recommended to the test year amounts of the eight miscellaneous expense items I am eliminating. As shown on Schedule TSC-14, this adjustment reduces rate year expense by \$296,698.

A.

Operating Reserve

8 Q. HOW HAVE YOU CALCULATED THE OPERATING RESERVE
9 ALLOWANCE INCLUDED IN THE DIVISION'S RECOMMENDED
10 TOTAL COST OF SERVICE?

Consistent with the Commission's decision in Docket No. 3832, I am including a total operating reserve allowance of 3.0 percent of expenses less miscellaneous revenues, of which 2.0 percent is restricted and 1.0 percent is unrestricted. However, I am proposing to adjust the amount that is collected through proposed rates to account for the incremental one time revenues that will be realized by Providence Water as the result of the switch from quarterly to monthly billing for all customers not already billed monthly. According to the response to KCWA 2-12, Providence Water expects to realize a one-time increase in revenue of \$2,196,330 in revenues based on current rates as the result of the switch to monthly billing. This amount will increase based on the revenue increase granted in this case.

I am proposing that \$2,200,000 million of additional revenues generated by the switch to monthly billing be set aside in the restricted operating reserve account and be used to reduce the amount that must be recovered in rates by \$1,100,000 per year for two years. This will help offset the significant increase in this case being sought to meet additional IFR and other costs. I have based the use of two years for

- the revenue requirement offset on Providence Water's stated intent (in KCWA-8) to
- 2 file another rate increase in two years in order to meet increased IFR funding
- 3 requirements. My calculation of the required IFR funding is shown on Schedule
- 4 TSC-2.
- 5 Q. DOES THIS COMPLETE YOUR TESTIMONY?
- 6 A. Yes, it does.

BEFORE THE

PUBLIC UTILITIES COMMISSION OF RHODE ISLAND

PROVIDENCE WATER)	DOCKET NO 4404
SUPPLY BOARD)	DOCKET NO. 4406

SCHEDULES ACCOMPANYING THE DIRECT TESTIMONY

OF

THOMAS S. CATLIN

ON BEHALF OF THE DIVISION OF PUBLIC UTILITIES AND CARRIERS

August 23, 2013



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

Summary of Revenues and Expenses at Present and Proposed Rates Rate Year Ended December 31, 2014

		Rate Year Amount Per Providence		Division justments	Rate Year at Present Rates	Proposed Rate Increase		Rate Year at Proposed Rates	
Revenue									
Service Charge	\$	5,726,796	\$	-	\$ 5,726,796			\$ 5,726,796	
Retail Sales		32,253,695		-	32,253,695			32,253,695	
Wholesale Sales		16,618,799		-	16,618,799			16,618,799	
Private Fire Protection		2,253,933		-	2,253,933			2,253,933	
Retail FPSC		1,095,131			1,095,131			1,095,131	
Public Fire Protection		959,965			959,965			959,965	
Miscellaneous		1,179,169			1,179,169			1,179,169	
Total Revenue	\$	60,087,488	\$	-	\$ 60,087,488	\$ 9,5	558,892	\$ 69,646,380	
Expenses									
Operation & Maintenance		30,126,993		(943,617)	29,183,376		-	29,183,376	
Insurance		2,084,590		(282,043)	1,802,547		-	1,802,547	
Chemicals & Sludge		5,458,942	(1,008,942)	4,450,000		-	4,450,000	
City Services		839,167		-	839,167		-	839,167	
Property Taxes		6,740,435		(252,919)	6,487,516		-	6,487,516	
Captital Reimbursement		(798,115)	(1,356,410)	(2,154,525)		-	(2,154,525)	
Net Operations	\$	44,452,012	\$ (3,843,931)	\$ 40,608,081	\$	-	\$ 40,608,081	
Capital Fund		2,450,000			2,450,000		-	2,450,000	
Western Cranston		62,069			62,069			62,069	
Infrastructure Replacement Fund		24,000,000			24,000,000			24,000,000	
Cash Funded AMR/Meter Replacement		1,000,000			1,000,000			1,000,000	
Equipment Replacement Fund Property Tax Refund Fun		600,000			600,000			600,000	
Revenue Reserve Fund		1,427,698		(76,879)	1,350,820		-	1,350,820	
Less: Reserve Funded from Monthly Billing			(1,100,000)	(1,100,000)			(1,100,000)	
Total Capital	\$	29,539,767	\$ (1,176,879)	\$ 28,362,889	\$	-	\$ 28,362,889	
Total Expenses	\$	73,991,779	\$ (5,020,809)	\$ 68,970,970	\$	-	\$ 68,970,970	
Operating Reserve		713,849		(38,439)	675,410			675,410	
Total Cost of Service	\$	74,705,628	\$ (5,059,249)	\$ 69,646,380	\$	-	\$ 69,646,380	
Revenue Surplus/(Deficiency)	\$	(14,618,140)	\$	5,059,249	(\$9,558,892)	\$ 9,5	558,892	\$0	

Summary of Division Adjustments to Rate Year Expenses Rate Year Ended December 31, 2014

Description	Amount		Source		
Rate Year Salaries and Wages	\$	(475,150)	Schedule TSC-3		
Payroll Clearing		(61,306)	Schedule TSC-4		
Overhead Clearing		(1,295,104)	Schedule TSC-5		
Benefits		580,214	Schedule TSC-6		
Inflation		(170,630)	Schedule TSC-7		
Bad Debt		(473,727)	Schedule TSC-8		
Insurance		(282,043)	Schedule TSC-9		
Chemicals		(1,008,942)	Schedule TSC-10		
Property Taxes		(252,919)	Schedule TSC-11		
Unidirectional Flushing		(90,000)	Schedule TSC-12		
Regulatory and Rate Case Expense		(17,626)	Schedule TSC-13		
Miscellaneous Expenses		(296,698)	Schedule TSC-14		
Operating Reserve		(115,318)	See Note (1)		
Reserve Funding from Monthly Billings		(1,100,000)	See Note (2)		
Total Expense Adjustments	\$	(5,059,249)			

- (1) Based on 3.0% of total expenses less miscellaneous revenues. Total is split with 2% going to restricted revenue reserve fund and 1% being unrestricted.
- (2) Reflects proposal to use one-time revenue increase to fund restricted revenue reserve fund and to reflect total as offset to rates over 2 years.

Adjustment to Salaries and Wages to Reflect Normal Employee Vacancies Rate Year Ended December 31, 2014

	 Salary
Total FY 2013 Wages (1) Less: Wages for Engineers Paid directly from IFR Fund (1)	\$ 13,587,511 (332,464)
FY 2013 Wage Expense per Books	\$ 13,255,047
Plus Wages for Employees on Workers Compensation (1)	 274,221
Total Salaries and Wages for Existing Employees	\$ 13,529,268
Plus Wages for 3 New Employees (2)	\$ 132,384
Adjusted FY 2013 Salaries and Wages	\$ 13,661,652
Adjustment to Bring to Rate Year Level	1.04545
Rate Year Wages per Division	\$ 14,282,574
Amount per Providence Water (4)	14,757,724
Adjustment to Salaries and Wages	\$ (475,150)

- (1) Per response to DIV 4-12.
- (2) Based on average wages for 19 vacant positions as of June 30, 2013.
- (3) Per Schedule HJS-S3. Reflects rate year effect of 3 % wage increases on July 1, 2013 and July 1, 2014.
- (4) Per Schedule HJS-S3.

Adjustment to Payroll Clearing Expense Rate Year Ended December 31, 2014

Payroll Clearing in Test Year (1)	\$ 798,115
Adjustment to Reflect Wage Increases (2)	1.0768
Rate Year Payroll Clearing	\$ 859,421
Test Year Payroll Clearing	 798,115
Adjustment to Rate Year Expense	\$ (61,306)

- (1) Per Schedule HJS-S1.
- (2) Reflects 3 percent increases on July 1, 2012, July 1, 2013 and one-half of the annual effect of a 3% increase on July 1, 2014.

Adjustment to Recognize Overheads Applied As Reimbusable from Capital Funds Rate Year Ended December 31, 2014

Overhead Clearing in Test Year (1)	\$ 1,202,719
Adjustment to Reflect Increase to Rate Year (2)	 1.0768
Rate Year Payroll Clearing	\$ 1,295,104
Amount per Providence Water	
Adjustment to Rate Year Expense	\$ (1,295,104)

- (1) Per Schedule HJS-A1.
- (2) Based on increase in payroll clearing from test year to rate year per Schedule TSC-4.

Adjustment to Benefits Expense Rate Year Ended December 31, 2014

FRINGE BENEFIT	Test Year FY 2012	Adjustment	Rate Year CY 2012
Union Combined Benefits (1)	\$ 586,821	\$ -	\$ 586,821
Union Pension (1)	331,312	124,905	456,217
Death Benefit Insurance (2)	1,943	91	2,034
Educational Classes/Certification (2)	2,649	124	2,773
FICA (3)	1,014,048	46,139	1,060,187
State Unemployment Compensation (3)	14,716	670	15,386
Healthcare EE Cash Payment (4)	9,500	(500)	9,000
1/2% Wage Assignment (3)	35,820.00	1,630	37,450
Blue Cross (4)	2,072,201	792,107	2,864,308
Less Employee Co-Share (4)	(355,216)	(137,709)	(492,925)
Delta Dental (4)	254,556	3,731	258,287
GASB 43/45 Reserve Required (5)	1,230,000	(750,000)	480,000
City Retirement (6)	2,315,228	629,981	2,945,209
Total	\$ 7,513,577.79	\$ 711,169	\$ 8,224,746
Amount per Providence Water (Schedule HJS-S6)			\$ 7,644,532
Adjustment		:	\$ 580,214

- (1) Amounts per DIV 1-18. Union Combined Benefits are not subject to increase. Union Pension increased by 37.7%.
- (2) Adjusted by Division inflation rate per Schedule TSC-7.
- (3) Reflects compounded salary increase of 4.55% per Schedule HJS-S6.
- (4) Reflects FY 2014 rates per Comm 1-11. Amounts have been adjusted to reflect 240 full time employees instead of 254 full time employees including 19 vacancies as of June 30, 2013.
- (5) Per Schedule HJS-6.
- (6) Per response to DIV 1-20.

Adjustment to Inflation Related Expense Increases Rate Year Ended December 31, 2014

	Inflation Base (1)	Inflation per Division (2) 4.695%	Inflation per Prov. Water (3) 6.376%	Adjustment	
Purchased Power Costs (4) Pumping Water Treatment Transmission and Distribution Administrative and General Subtotal	\$ 778,684 457,253 12,019 113,972 \$ 1,361,928	\$ - - - - - \$ -	\$ 49,647 29,153 766 7,267 \$ 86,833	\$ (49,647) (29,153) (766) (7,267) \$ (86,833)	
Other Expenses Source of Supply Pumping Expenses Water Treatment Transmission and Distribution Customer Accounts (5) Administrative and General Subtotal	638,455 790,313 523,922 865,429 208,639 1,959,197 \$ 4,985,955	29,976 37,106 24,599 40,633 9,796 91,987 \$ 234,098	40,707 50,389 33,404 55,178 13,303 124,914 \$ 317,895	(10,731) (13,283) (8,805) (14,545) (3,507) (32,927) \$ (83,797)	
Total	\$ 6,347,883	\$ 234,098	\$ 404,728	\$ (170,630)	

- (1) Amounts subject to inflation adjustment per Schedule HJS-S2.
- (2) Based on increase in Average GDP-PI for fourquarters ending 2Q12 to four quarters ending 4Q14 per Blue Chip Economic Indicators dated August 10, 2013.
- (3) Per Schedule HJS-S2.
- (4) Refer to testimony for explanation regarding not inflating power supply costs.
- (5) Excludes Bad Debt which is treated separately on Schedule TSC-8.

Adjustment to Bad Debt Expense Rate Year Ended December 31, 2014

	Total
Bad Debt Expense (1)	
12 Months Ending 6/30/2010	\$ 720,206
12 Months Ending 6/30/2011	(524,135)
12 Months Ending 6/30/2012	445,333
6 Months Ending 12/31/2012	(1,320,107)
Total	\$ (678,703)
Average Annual Expense (divide by 4)	\$ (193,915)
Amount per Providence Water Filing (2)	 473,727
Adjustment to Bad Debt Expense (Eliminate Claimed Expense)	\$ (473,727)

- (1) Per response to DIV 1-4 and Comm 1-28.
- (2) Per Schedule HJS-S2. Includes inflation adjustment to actual test year expense.

Adjustment to Insurance Expense Rate Year Ended December 31, 2014

	FY 2011 (1)	FY 2012 (2)	FY 2013 (3)	FY 2014/ CY 2014 (4)
Worker's Compensation Injuries and Damages Property and Casualty Program Expense Safety Supplies & Other	\$ 837,689 28,851 1,011,910 1,800 36,627	\$ 874,015 54,528 1,006,353 7,150 17,602	\$ 848,550 109,666 1,062,090 N/A N/A	\$ 693,532 64,348 1,018,753 7,486 18,428
Total Expenses (5)	\$ 1,916,877	\$ 1,959,648	\$ 2,020,306	\$ 1,802,547
Amount per Providence Water (2)				2,084,590
Adjustment to Insurance Expense				\$ (282,043)

- (1) Per response to DIV 1-13.
- (2) Per Schedule HJS-S5.
- (3) Per response to DIV 1-14.
- (4) Refer to testimony for explanation of development of costs.

Adjustment to Chemicals Expense Rate Year Ended December 31, 2014

		Actual Usage Greater of		Greater of				
	Estimated	FY 2012	FY 2013	FY 2012 or	Rate Year	Annual		
	Quantity (1)	Usage (2)	Usage (3)	FY 2013	Unit Price (4)	Cost		
Ferric Sulfate (Gallons)	1,460,000	1,136,679	870,563	1,136,679	\$ 1.4000	\$ 1,591,351		
Quicklime (Tons)	3,139	2,834	2,322	2,834	214.1600	606,929		
Chlorine (Tons)	200	173	194	194	800.0000	155,200		
Flouide (Gallons)	70,000	56,903	50,681	56,903	2.5630	145,842		
Carbon Dioxide (Tons) Total Treatment Chemical Costs	1,000	506	353	See Note (5)	-	\$ 2,499,322		
Sludge Maintenance Costs						1,700,000		
Total Chemical Costs and Sludge Handl	ing Costs					\$ 4,199,322		
Incremental Restricted Fund Contribution to Eliminate Shortfall (5)								
Division Recommended Funding of Chemical and Sludge Maintenance Restricted Account (Rounded)								
Proposed Funding Contribution per Providence Water (Schedule HJS-S-8.)								
Adjustment to Chemical and Sludge Maintenance Funding								

- Notes:
 (1) Per response DIV 1-27.
 - (2) Per response to DIV 1-26.
 - (3) Per resonse to DIV 4-10.
 - (4) Per response to DIV 4-1.
 - (5) Refer to testimony.

Adjustment to Reflect Updated Property Tax Expense Rate Year Ended December 31, 2014

<u>Municipality</u>	<u>F</u>	Actual <u>Y 2011 (1)</u>	<u>F</u>	Actual Y 2012 (1)	<u>F</u>	Actual Y 2013 (1)	<u>E</u>	Actual Y 2014 (2)	Estimated Y 2015 (3)	CY 2014 <u>Average</u>
Scituate Glocester		4,974,437 49,380		5,087,357 51,478		5,087,357 53,537		5,566,124 55,679	5,677,446 57,906	5,621,785 56,793
All Other North Providence West Glocester Fire Harmony Fire District Chepachet Fire District Johnston Foster Cranston West Warwick	\$	239,090 3,932 155 120 86,695 331,673 107,568 3,761	\$	266,581 3,708 164 131 90,117 331,673 110,523 3,761	\$	266,581 3,708 164 133 90,117 306,694 118,597 3,761	\$	268,137 3,708 171 138 94,907 307,901 120,152 3,682	\$ 273,500 3,782 177 144 98,703 314,059 124,958 3,756	\$ 270,818 3,745 174 141 96,805 310,980 122,555 3,719
Subtotal-All Other	\$	772,994	\$	806,658	\$	789,755	\$	798,796	\$ 819,079	\$ 808,938
Total Property Taxes	\$	5,796,811	\$	5,945,492	\$	5,930,648	\$	6,420,599	\$ 6,554,432	\$ 6,487,515
Amount per Providence Wate	r (1)							6,608,270	6,872,599	6,740,435
Adjustment to Property Tax Ex	xpen	se								\$ (252,919)

- (1) Per Schedule HJS-S4A.
- (2) Per response to DIV 4-7 except Harmony and Chepachet Fire Districts which are increased by 4 percent over FY 2013.
- (3) Refer to testimony for derivation of FY 2015 amounts. Scituate is based on recent increases in the property tax rate. Glocester reflects the taxes due pursuant to the tax treaty with Providence Water. All other amounts escalated by 2% based on the overall average increase in taxes other than Scituate and Gloster in recent years. Refer to testimony.

Adjustment to Unidirectional Flushing Expense Rate Year Ended December 31, 2014

	 Total
Field Operations-Original Estimate (1)	\$ 380,000
Field Operations-Revised Estimate (1)	 290,000
Adjustment to Unidirectional Flushing Costs	\$ (90,000)

Note:

(1) Per response to DIV 1-30.

Adjustment to Rate Case and Regulatorty Expense Rate Year Ended December 31, 2014

	 Total
Docket 4062/Conservation Rate Filing (1)	\$ 8,593
Field Operations-Revised Esttimate (1)	 9,033
Adjustment to Remonve Costs of Prior Proceedings	\$ (17,626)

Note:

(1) Per response to DIV 1-24.

Adjustment to Miscellaneous Expense Rate Year Ended December 31, 2014

		Total (1)
Hazardous Waste Disposal and Containment-Triumvirate Environmental Air Quality Violation-R.I. Department of Environmental Management Customer Refund 1 Customer Refund 2	\$	17,937 2,775 3,620 599
Software Conversion-Zandar Billing Software/Oracle Support-Adaptive Minds Appraisal Service-Sansoucy Legal Services/Strategic Plan-Partridge, Snow & Hahn Total	-\$	28,000 125,528 35,000 69,933 283,392
Escalation Factor for Inflation (2)	Ψ	1.04695
Adjustment to Miscellaneous Expenses	\$	(296,698)

- (1) Per response to Comm 1-33.
- (2) Per Schedule TSC-7. Amount in Providence Water reflected inflation factor of 6.376% which was adjusted to reflect Division inflation factor or 4.695% on Schedule TSC-7.