KEOUGH & SWEENEY, LTD. ATTORNEYS AND COUNSELORS AT LAW 41 MENDON AVENUE PAWTUCKET, RHODE ISLAND 02861 TELEPHONE (401) 724-3600 FACSIMILE (401) 724-9909 www.keoughsweeney.com

> JOSEPH A. KEOUGH JR.* JEROME V. SWEENEY III*

SEAN P. KEOUGH* STACI L. KOLB

JEROME V. SWEENEY II OF COUNSEL

*ADMITTED TO PRACTICE IN RHODE ISLAND & MASSACHUSETTS BOSTON OFFICE: 171 MILK STREET SUITE 30 BOSTON, MA 02109 TEL. (617) 574-0054 FAX (617) 451-1914

April 3, 2014

Ms. Luly Massaro, Clerk Rhode Island Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888

Re: United Water Rhode Island, Inc. – Docket 4434

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the following document:

1. A Comparison of the positions set forth by United Water Rhode Island, Inc. and the Division of Public Utilities and Carriers in their respective testimonies as compared to the Final Settlement reached between the parties.

This document is being provided to the Commission to assist it in its review of the proposed Settlement Agreement.

Thank you for your attention to this matter.

Sincerely,

Joseph A. Keough, Jr.

JAK/kf Enclosures

RAYNHAM OFFICE: 90 NEW STATE HIGHWAY RAYNHAM, MA 02109 TEL. (508) 822-2813 FAX (508) 822-2832

United Water Rhode Island Comparison of As-Filed Proposed to Joint Settlement Income Statement

	Proposed 2013 Rate Case <u>RY - 12/31/14</u>	Division	<u>1 Staff</u>	<u>Company F</u> Adjustment		<u>Joint Settlement</u> Schedules	
		<u>Adjustment</u>	Proposed	<u>Adjustment</u>	Proposed	Adjustment	Proposed
Operating Revenues	\$3,670,266	\$80,673	\$3,750,939	(\$48,978)	\$3,701,961	\$14,372	\$3,716,333
Projected increase	<u>1,563,153</u>		1,007,074		1,405,003		1,207,267
Total operating revenues	<u>\$5,233,419</u>	<u>\$80,673</u>	\$4,758,013	<u>(</u> \$48,978)	\$5,106,964	<u>\$14,372</u>	<u>\$4,923,600</u>
	42.59%		26.85%		37.95%	<u></u>	<u>32.49%</u>
Operating Expenses							52.1570
Operating & maintenance expenses	2,306,364	(94,149)	2,212,215	58,624	2,270,839	(40,711)	2,230,128
Depreciation and Amortization	600,370		600,370	,	600,370	(-0,711)	600,370
Taxes other than income	439,707	(14,634)	425,073	12,157	437,230	(10,087)	427,143
Federal income tax	499,244	(116,782)	382,462	93,039	475,501	(50,492)	425,009
Total Operating Expenses	3,845,685	(225,565)	3,620,120	<u>163,820</u>	3,783,940	(101,290)	<u>3,682,650</u>
			<u> </u>	100/020	5,765,510	(101,250)	5,082,050
Operating Income	<u>\$1,387.734</u>	<u>\$306,238</u>	<u>\$1,137,893</u>	<u>(\$212,798)</u>	<u>\$1,323,024</u>	<u>\$115,662</u>	<u>\$1,240,950</u>
Rate Base (Average)	<u>\$15,859,818</u>	<u>(\$1,122,445)</u>	<u>\$14,737,373</u>	<u>\$906.105</u>	<u>\$15,643,478</u>	<u>\$2,161</u>	<u>\$15,645,639</u>
Rate of Return	<u>8.75%</u>		<u>7.72%</u>		<u>8.46%</u>		<u>7.93%</u>

United Water Rhode Island Comparison of As-Filed Proposed to Joint Settle Operation and Maintenance Expenses	<u>Divisior</u>		<u>Company Rebuttal</u> Adjustments to Staff		<u>Joint Settlement</u> <u>Schedules</u>		
		Adjustment	Proposed	<u>Adjustment</u>	Proposed	<u>Adjustment</u>	Proposed
Wages and Salaries	\$561,813	(\$15,931)	545,882		E4E 000		
Incentive Comp.	37,745	(11,450)	26,295	11,450	545,882 37,745	(11, 150)	545,882
Fringe Benefits Transferred	(71,063)	(10,157)	(81,220)	11,430	-	(11,450)	26,295
Power Expense	242,627	10,129	252,756	23,687	(81,220)	(11.000)	(81,220)
Chemical Expense	52,735	(9,044)	43,691	25,067	276,443	(11,293)	265,150
Pension Expense	135,135	(0)011)	135,135		43,691		43,691
PEBOP Expense	58,300	(2,556)	55,744		135,135		135,135
Employee Health and Welfare Expense	188,130	(59)	188,071		55,744		55,744
Tank Painting Amortization	43,383	(55)	43,383		188,071		188,071
Transportation/Vehicle Expense	75,329	(4,857)	70,472	2.004	43,383		43,383
Insurance Expense	51,714	(203)	51,511	2,081	72,553		72,553
Customer Information/Billing Expense	58,566	(491)	58,075		51,511		51,511
Rate Case Expense	226,979	(451)	226,979		58,075		58,075
Rent Expense	25,800				226,979		226,979
M&S	273,503	(15,965)	25,800		25,800		25,800
Outside Services Expense	101,937	. , ,	257,538		257,538		257,538
Regulatory Commission Expense	16,390	(31,266)	70,671	20,915	91,586	(15,966)	75,620
Other Operation and Maintenance Expense	<u>2</u> 27,343	(1,032)	15,358	491	15,849	(2,002)	13,847
	227,345	(1,267)	226,076		<u>226,076</u>		<u>226,076</u>
Total Operation and Maintenance Expenses	<u>\$2,306,365</u>	<u>(\$94,149)</u>	<u>\$2,212,216</u>	<u>\$58,624</u>	<u>\$2,270,840</u>	<u>(\$40,711)</u>	<u>\$2,230,129</u>
Taxes Other Than Income:							
Property Tax Expense	315,024	(8,192)	306,832	8,192	215 024	(0,400)	
Payroll Tax Expense	59,265	(499)	58,766		315,024	(8,192)	306,832
Gross Receipts Tax Expense	65,418	(5,943)	•	0	58,766	<i>(</i>)	58,766
• • • • •	00,410	[3,343]	<u>59,475</u>	<u>3,965</u>	63,440	<u>(1,895)</u>	<u>61,545</u>
Total Taxes Other Than Income	<u>\$439,707</u>	<u>(\$14,634)</u>	<u>\$425,073</u>	<u>\$12,157</u>	<u>\$437,230</u>	<u>(\$10,087)</u>	<u>\$427,143</u>

United Water Rhode Island Comparison of As-Filed Proposed to Joint Settlement

Rate Base (Average)

	Proposed 2013 Rate Case	Division Staff		<u>Company Rebuttal</u> Adjustments to Staff		<u>Joint Settlement</u> Schedules	
	<u>RY - 12/31/14</u>	<u>Adjustment</u>	Proposed	<u>Adjustment</u>	Proposed	Adjustment	Proposed
Utility Plant In Service	\$28,149,420		\$28,149,420		\$28,149,420		\$28,149,420
Accumulated Depreciation	(7,003,970)		(7,003,970)		(7,003,970)		(7,003,970)
Net Utility Plant in Service	21,145,450	-	21,145,450	-	21,145,450	-	21,145,450
Materials and Supplies	86,062		86,062		86,062		86,062
Cash Working Capital (CWC)	287,684	(16,974)	270,710		270,710	2,161	272,871
Defd Tank Painting (net of Defd Tax)	168,165		168,165		168,165	-)202	168,165
Defd Rate Case (net of Defd Tax)	199,366	(199,366)	0		0		0
	741,276	(216,340)	524,936	-	524,936	2,161	527,097
CIAC	(3,533,455)		(3,533,455)		(3,533,455)		(3,533,455)
Defd Income Tax	(1,842,541)	(906,105)	(2,748,646)	906,105	(1,842,541)		(1,842,541)
Unamortized ITC	(89,099)		(89,099)		(89,099)		(89,099)
Unfunded FAS 106 (net of Def'd Tax)	(561,813)		(561,813)		(561,813)		(561,813)
	(6,026,908)	(906,105)	(6,933,013)	906,105	(6,026,908)		(6,026,908)
Total Rate Base	\$15,859,819	(\$1,122,445)	\$14,737,374	\$906,105	\$15,643,479	\$2,161	\$15,645,640

United Water Rhode Island Comparison of As-Filed Proposed to Joint Settlement Capital Structure and Rate of Return

Current rate case	<u>Rate Case P</u> Percent to	Rate Case Pro-Forma as-filed Percent to Cost		Division Staff		Company Rebuttal			Joint Settlement Schedules			
	Total	Rate	Weighted Cost	Percent to <u>Total</u>	Cost <u>Rate</u>	Weighted Cost	Percent to <u>Total</u>	Cost <u>Rate</u>	Weighted Cost	Percent to Total	Cost <u>Rate</u>	Weighted Cost
Long term debt	46.55%	6.05%	2.82%	46.24%	6.05%	2.80%	46.55%	6.05%	2.82%	46.24%	6.05%	2.80%
Short term debt				0.64%	1.00%	0.01%			0.00%	0.64%	1.00%	0.01%
Stockholder's equity	53.45%	11.10%	<u>5.93%</u>	53.13%	9.25%	<u>4.91%</u>	53.45%	10.55%	5.64%	53.13%	9.65%	5.13%
Total Capital	<u>100.00%</u>		<u>8.75%</u>	<u>100.01%</u>		<u>7.72%</u>	<u>100.00%</u>		<u>8.46%</u>	<u>100.01%</u>		<u>7.94%</u>