BEFORE THE

PUBLIC UTILITIES COMMISSION OF RHODE ISLAND

THE NARRAGANSETT
BAY COMMISSION

DOCKET NO. 4478

DIRECT TESTIMONY

OF

THOMAS S. CATLIN

ON BEHALF OF THE
DIVISION OF PUBLIC UTILITIES AND CARRIERS

May 16, 2014

EXETER

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

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| | | Direct Testimony of Thomas S. Catlin |
| 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 |

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 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. | DO YOU HAVE PREVIOUS EXPERIENCE IN MATTERS INVOLVING |
| 21 | | THE NARRAGANSETT BAY COMMISSION? |
| 22 | A. | Yes, I presented testimony on behalf of the Division in numerous Narragansett Bay |
| 23 | | Commission (NBC) rate filings before this Commission. This includes NBC's |
| 24 | | general rate case in Docket No. 3162, its abbreviated rate proceeding in Docket No. |
| 25 | | 3409, the Commission's examination of issues related to the implementation of a |
| | | |

Page 3

Direct Testimony of Thomas S. Catlin

1

| CSO abatement fee or stormwater fee by NBC in Docket No. 3432, NBC's general |
|--|
| rate case in Docket No. 3483, its abbreviated rate filing in Docket No. 3592, its |
| compliance filing on Docket No. 3639, its abbreviated rate filing in Docket No. 3707, |
| its compliance rate filing in docket No. 3775, its general rate filing in Docket No. |
| 3797, its general rate filing in Docket No. 4026, and its compliance rate filing in |
| docket No. 4151. I was also was involved in reviewing and evaluating NBC's |
| general rate case in Docket No. 4205 before it was withdrawn and reviewed and |
| provided memorandums to the Division which were provided to the Commission |
| regarding NBC's compliance filings in Dockets 4214, 4305 and 4352. Most recently, |
| I presented testimony on behalf of the Division in NBC's general rate filing in Docket |
| No. 4364 |

In addition to filings before this Commission, I have also assisted in reviewing a number of the filings that NBC has made with the Division seeking authorization to issue new debt, including the most recent filing in Docket No. D-13-143.

WHAT IS THE PURPOSE OF YOUR TESTIMONY?

Exeter Associates was retained by the Division to assist it in the evaluation of the General Rate Filing submitted by NBC on December 23, 2014. This testimony presents my findings and recommendations both with regard to the overall revenue increase to which NBC is entitled and with regard to the design of rates to recover those additional revenues.

HAVE YOU PREPARED SCHEDULES TO ACCOMPANY YOUR

TESTIMONY?

Q.

A.

Q.

A. Yes. I have prepared Schedules TSC-1 through TSC-15. Schedule TSC-1 provides a summary of revenues and expenses under present and proposed rates. Schedules TSC-2 through TSC-13 present the adjustments that I am recommending be made to

| 1 | | NBC's claimed revenues and operating expenses. Schedules TSC-14 and TSC-15 set |
|----|----|---|
| 2 | | forth my findings and recommendations with regard to rate design. |
| 3 | | |
| 4 | | Summary and Recommendations |
| 5 | Q. | PLEASE SUMMARIZE THE RATE RELIEF REQUESTED BY NBC IN |
| 6 | | ITS FILING. |
| 7 | A. | As discussed in the testimony of NBC witness Walter E. Edge, NBC's filing seeks an |
| 8 | | increase in revenues of \$4,898,768, which represents an overall revenue increase in |
| 9 | | user fee revenues of 5.46 percent. To develop its claim, NBC started with the results |
| 10 | | for the rate year in Docket No. 4364, which corresponded to fiscal year (FY) 2014, as |
| 11 | | the test year. NBC then adjusted the FY 2014 rate year cost of service from Docket |
| 12 | | No. 4364 to reflect changes to become effective for a FY 2015 rate year. |
| 13 | Q. | PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS. |
| 14 | A. | As shown on Schedule TSC-1, I have determined the NBC's overall revenue |
| 15 | | requirement to be \$95,383,177. This represents an increase over revenues at present |
| 16 | | rates of \$2,489,039. The revenue increase that I have identified is \$2,409,729 less |
| 17 | | than the revenue increase of \$4,898,768 requested by NBC. This difference is the |
| 18 | | result of the adjustments to NBC's claimed revenues and operating expenses that are |
| 19 | | summarized on Schedule TSC-2. |
| 20 | | With regard to the development of rates to recover the NBC's overall cost of |
| 21 | | service, I have accepted NBC's proposal to recover the additional revenues through a |
| 22 | | uniform percentage increase in the flat fees and volumetric rates applicable to |
| 23 | | residential, commercial and industrial customers. |
| 24 | Q. | WHAT TIME PERIODS HAVE YOU UTILIZED IN MAKING YOUR |
| 25 | | DETERMINATION OF NBC'S REVENUE REQUIREMENTS? |

| A. | I have accepted NBC's use of the FY 2014 rate year from Docket No. 4364 as the test |
|----|---|
| | year starting point as well as the use of a rate year ending June 30, 2015 as the basis |
| | for determining NBC's revenue requirements and the revenue increase necessary to |
| | recover those requirements. However, I have also utilized FY 2013 as a point of |
| | comparison and have made several adjustments to the cost of service to reflect more |
| | recent actual experience than the projected FY 2014 rate year costs from Docket No. |
| | 4364, which were developed using FY 2012 as a starting point. |

HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?

The remainder of my testimony is organized into sections corresponding to the issue or topic being addressed. These sections are set forth in the Table of Contents for this testimony.

A.

Q.

A.

Revenues from REC Sales

Q. PLEASE EXPLAIN THE DIVISION ADJUSTMENT TO REVENUES
 FROM THE SALE OF RECS SHOWN ON SCHEDULE TSC-2.

In Docket No. 4364, revenues from the sale of renewable energy credits (RECs) were estimated based on projections of energy generation from NBC's wind turbines at Field's Point and estimated REC prices because those wind turbines were just entering service. NBC made no adjustment to those revenues in this filing. I have adjusted revenues for the rate year to reflect the actual sales of RECs during the 12 months ended December 31, 2013 and the price at which the RECs generated in the first and second quarters of 2013 were sold. This adjustment, which is calculated in conjunction with my adjustment to electricity costs on Schedule TSC-8, results in an increase in miscellaneous revenue of \$61,630.

| 1 | | Personnel Costs |
|----|----|--|
| 2 | Q. | HOW DID NBC DEVELOP ITS CLAIM FOR SALARY EXPENSE AND |
| 3 | | RELATED PERSONNEL COSTS FOR THE FY 2015 RATE YEAR? |
| 4 | A. | As discussed in more detail by NBC witness Walter E. Edge, NBC started with the |
| 5 | | salaries and wages approved in Docket No. 4364 for the FY 2014 rate year. These |
| 6 | | amounts were then adjusted to reflect union step increases, an allowance for |
| 7 | | compensated absence payments, and projected wage increases to take effect on July |
| 8 | | 1, 2014. Based on these projected salaries and wages and projected FY 2015 |
| 9 | | contribution rates, NBC adjusted union retirement, union retiree health, non-union |
| 10 | | retirement, and FICA costs to projected FY 2015 rate year levels. |
| 11 | Q. | HAVE YOU PREPARED A SCHEDULE SHOWING THE |
| 12 | | DEVELOPMENT OF YOUR PROJECTION OF RATE YEAR SALARIES |
| 13 | | AND WAGES AND RELATED COSTS? |
| 14 | A. | Yes. Schedule TSC-3 presents my calculation of FY 2015 rate year salaries and |
| 15 | | wages and related costs. As shown there, I have started with actual FY 2013 regular |
| 16 | | and overtime salaries and wages. I have then adjusted those amounts for the actual |
| 17 | | July 1, 2013 and projected July 1, 2014 union step increases and union and non-union |
| 18 | | wage increases. As discussed subsequently, I have also included an allowance for |
| 19 | | compensated absences based on the actual amount of such payments in FY 2013. For |
| 20 | | non-union employees, I have used a normalized level of overtime expenses. |
| 21 | | As also shown on Schedule TSC-3, I have calculated the rate year level of |
| 22 | | capitalized wages and benefits (salary and fringe reimbursements) by escalating the |
| 23 | | FY 2013 amounts by the July 1, 2013 and July 1, 2014 non-union percentage salary |
| 24 | | increases. Finally, I have calculated FICA taxes and retiree benefits costs based on |

my projections of FY 2015 rate year salaries and wages and the applicable 2015 employee contribution rates.

Q. PLEASE DISCUSS YOUR TREATMENT OF COMPENSATED

ABSENCES.

Q.

A.

A.

NBC has adjusted projected FY 2014 salaries from Docket No. 4364 to include an additional \$250,000 for Compensated Absences. According to the responses to COMM 1-30 and 2-13, this represents the projected increase in the payout of unused sick leave to employees at the time of retirement. I am proposing to eliminate that amount and instead base the allowance for Compensated Absences on the amounts paid to retirees for unused sick leave in FY 2013.

WHY HAVE YOU MADE THIS ADJUSTMENT?

I have revised the allowance for Compensated Absences to reflect actual experienced costs for several reasons. First, the \$250,000 claimed by NBC is not known and measurable. NBC has provided no support for this claim other than the response to COMM 2-13 indicating that NBC is projecting approximately 13 additional employees will become eligible for sick compensated absences in FY 2015 at an average expense of \$19,230 each. By way of comparison, over the Fiscal Years 2009 through 2013, only three or four employees have retired and received compensation for unused sick time in any year. The average payment has been roughly \$9,300 per retired employee. Hence, the amounts claimed are not consistent with actual experience. Finally, when long-term employees retire and are replaced, wage savings normally occur because the new employees will be hired at a lower wage rate than the retiring employees. These savings will at least partially offset the costs of paying for unused sick leave.

| 1 | Q. | WHAT ALLOWANCE HAVE YOU INCLUDED FOR |
|----|----|--|
| 2 | | UNCOMPENSATED ABSENCES PAYMENTS FOR UNUSED SICK |
| 3 | | LEAVE? |
| 4 | A. | Over the last five years, NBC paid out an average of approximately \$33,400 per year |
| 5 | | to retiring employees for unused sick leave based on one-half of the accrued balance. |
| 6 | | For FY 2013, the amount was \$53,900 and I have added that amount to the FY 2013 |
| 7 | | salaries and wages that I have used as my starting point to project rate year wages in |
| 8 | | this case. |
| 9 | Q. | PLEASE EXPLAIN WHY YOU NORMALIZED NON-UNION OVERTIME |
| 10 | | RATHER THAN SIMPLY USING THE FY 2013 AMOUNT IN YOUR |
| 11 | | DETERMINATION OF RATE YEAR SALARIES AND WAGES. |
| 12 | A. | During FY 2013, non-union overtime was \$95,267 compared to \$59,947 in FY 2011 |
| 13 | | and \$66,499 in FY 2012. Because of the unusual increase in FY 2013, I utilized a |
| 14 | | three-year average level of overtime to normalize non-union overtime expense. In |
| 15 | | developing the average, I adjusted FY 2011 and FY 2012 to FY 2013 wage levels to |
| 16 | | account for the wage increases that took place on July 1, 2012 and July 1, 2013. |
| 17 | Q. | WHAT IS THE EFFECT OF YOUR ADJUSTMENT TO PERSONNEL ON |
| 18 | | RATE YEAR EXPENSE? |
| 19 | A. | The overall effect of my adjustment to salaries and wages and related costs is to |
| 20 | | reduce rate year expenses by \$697,492. I would note that \$304,328 of this reduction |
| 21 | | is due to NBC's decision to eliminate its claim for increased non-union retirement |
| 22 | | funding as communicated by letter from Joseph A. Keough, Jr., Esq., to Patricia |
| 23 | | Lucarelli, Esq., dated January 30, 2014. |
| | | |

| 1 | | Workers Compensation – Old Claims |
|----|----|---|
| 2 | Q. | WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO THE |
| 3 | | EXPENSE INCLUDED BY NBC FOR WORKERS COMPENSATION- |
| 4 | | OLD CLAIMS? |
| 5 | A. | Workers Compensation (W/C) Old Claims reflects amounts that NBC is paying for |
| 6 | | workers compensation claims related to the period when NBC was self-insured for |
| 7 | | such claims. According to the supplemental response to DIV 1-12, there are two |
| 8 | | remaining claims for which the cost will total \$23,388 for FY 2015. As shown on |
| 9 | | Schedule TSC-4, this is \$18,858 less than the amount that NBC has included in its |
| 10 | | claimed cost of service based on the approved amount from Docket No. 4364. |
| 11 | | |
| 12 | | Postage Costs |
| 13 | Q. | WHAT ADJUSTMENT DID NBC MAKE TO POSTAGE COSTS? |
| 14 | A. | NBC calculated rate year postage costs by escalating FY 2013 postage costs by the |
| 15 | | average annual increase over the two-year period from FY 2011 through FY 2013 of |
| 16 | | 11.3 percent. This resulted in an increase on postage expense of \$112,627 compared |
| 17 | | to the Docket No. 4364 amount that was based on actual FY 2012 postage costs. |
| 18 | Q. | DO YOU AGREE WITH NBC'S METHOD OF PROJECTING RATE |
| 19 | | YEAR POSTAGE COSTS? |
| 20 | A. | No. NBC's adjustment assumes that increases on the number of bills and increases in |
| 21 | | postage rates from FY 2013 to FY 2015 will continue to increase at the same rate as |
| 22 | | occurred from FY 2011 to FY 2013. However, NBC has provided no support for this |
| 23 | | assumption. In fact, NBC has projected no growth in the number of customers in this |
| 24 | | case compared to FY 2012. |

| 1 | Q. | HOW ARE YOU PROPOSING TO PROJECT POSTAGE EXPENSE FOR |
|----|----|---|
| 2 | | THE RATE YEAR? |
| 3 | A. | My determination of rate year postage expense is presented on Schedule TSC-5. As |
| 4 | | shown there, I have calculated the average postage expense per bill issued in FY 2013 |
| 5 | | (\$0.3797 per bill). I have then added \$0.035 to this amount to annualize the one-cen |
| 6 | | postage increase that occurred in January 2013 and to reflect the full annual effect of |
| 7 | | the three-cent postage increase that occurred on January 26, 2014. I then multiplied |
| 8 | | this adjusted postage expense per bill by the FY 2013 number of bills to arrive a |
| 9 | | annual postage expense for the rate year of \$405,586. This represents a reduction of |
| 10 | | \$54,786 compared to NBC's claim. |
| 11 | | |
| 12 | | Biosolids Disposal Costs |
| 13 | Q. | HOW ARE THE COSTS FOR BIOSOLIDS DISPOSAL AT THE FIELD'S |
| 14 | | POINT AND BUCKLIN POINT WASTEWATER TREATMENT |
| 15 | | FACILITIES DETERMINED? |
| 16 | A. | NBC has a contract for the disposal of the biosolids at the Field's Point Wastewater |
| 17 | | Treatment Facility (Field's Point) and the Bucklin Point Wastewater Treatment |
| 18 | | Facility (Bucklin Point) under which the costs are based on the tons of sludge |
| 19 | | produced and the applicable rate for a given contract year. (Contract years |
| 20 | | correspond to calendar years.) The disposal rate is adjusted annually based on the |
| 21 | | increase in the Consumer Price Index for Urban Wage Earners and Clerical Workers |
| 22 | | (CPI-W) for Boston-Brockton-Nashua (Boston area) from November to November. |
| 23 | Q. | HOW DID NBC DEVELOP ITS CLAIMED RATE YEAR SLUDGE |
| 24 | | DISPOSAL COSTS PURSUANT TO THIS ARRANGEMENT? |

For Bucklin Point, NBC estimated the quantity of biosolids for the rate year based on the average tons of biosolids produced in FY 2011 through FY 2013. For Field's Point, the tons of biosolids produced have been increasing due to the new (Biological Nutrient Removal (BNR) facilities located there. Accordingly, NBC estimated the quantity of sludge produced at Field's Point by increasing the FY 2013 quantity to FY 2015 levels based on the average annual percentage increase from FY 2011 to FY 2013.

To determine the rates applicable in the rate year, NBC escalated the contract rate for calendar year 2013 by 1.90 percent to determine the rate for 2014 (applicable to the first half of the rate year) and by an additional 1.90 percent to determine that rate for 2015 (applicable to the second half of the rate year). The 1.90 percent annual escalation rate used by NBC was based on the increase in the CPI-W for the Boston area from November 2011 to November 2012.

Q. WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO NBC'S CLAIMED BIOSOLIDS DISPOSAL COSTS?

I am proposing to adjust NBC's claimed costs to reflect revised sludge disposal rates for the rate year. As noted previously, NBC escalated the disposal rate for 2013 by 1.90 percent per year to project the disposal rates for 2014 and 2015. This escalation rate of 1.90 percent was based on the historical increase in the CPI-W for the Boston area from November 2011 to November 2012 that was used to establish the disposal rate for 2013 and not the prospective level of inflation that will determine 2014 and 2015 sludge disposal rates. I have revised the 2014 sludge disposal rate to reflect the actual increase in the CPI for the Boston area from November 2012 to November 2013 of 0.94 percent. I have revised the 2015 sludge disposal rate to reflect projected inflation from November 2013 to November 2014 of 2.0 percent based on the April

A.

A.

| 1 | | 10, 2014 Blue Chip Economic Indicators consensus forecast of the increase in the CPI |
|----|----|---|
| 2 | | for all urban consumers (CPI-U) from the fourth quarter of 2013 to the fourth quarter |
| 3 | | of 2014. |
| 4 | Q. | HAVE YOU PREPARED A SCHEDULE SHOWING THE EFFECT OF |
| 5 | | YOUR ADJUSTMENT TO THE 2014 AND 2015 SLUDGE DISPOSAL |
| 6 | | RATES ON PROJECTED RATE YEAR BIOSOLIDS DISPOSAL COSTS? |
| 7 | A. | Yes. Schedule TSC-6 presents my adjustment to biosolids disposal costs. As shown |
| 8 | | there, I have calculated biosolids disposal costs for the first half of the rate year using |
| 9 | | NBC's estimated sludge quantities and the actual rate that will be in effect during the |
| 10 | | period from July1, 2014 through December 31, 2014. As noted previously, I have |
| 11 | | determined the disposal rate for the second half of the rate year by escalating the 2014 |
| 12 | | disposal rate by 2.0 percent. This reflects the projected increase in the CPI-U from |
| 13 | | the fourth quarter of 2013 to the fourth quarter of 2014 based on the April 10, 2014 |
| 14 | | Blue Chip Economic Indicators consensus forecast. I have then applied this rate to |
| 15 | | NBC's projected sludge quantities for the second half of the rate year. As shown on |
| 16 | | Schedule TSC-6, I have estimated biosolids disposal costs to be \$4,975,663, which is |
| 17 | | \$45,063 less than the estimate of \$5,020,726 that NBC included in its filed claim. |
| 18 | | |
| 19 | | Maintenance and Service Agreements |
| 20 | Q. | HOW DID NBC DEVELOP ITS CLAIM FOR MAINTENANCE AND |
| 21 | | SERVICE AGREEMENT COSTS? |
| 22 | A. | NBC projected the rate year level of maintenance and service (M&S) agreement costs |
| 23 | | by escalating the projected expense for the FY 2014 rate year in Docket No. 4364 by |
| 24 | | an annual growth rate of 12.1 percent. The 12.1 percent annual escalation rate was |

calculated based on the increase in M&S agreement expense from FY 2011 to FY 2013.

Q. DO YOU AGREE WITH THIS PROJECTION?

A.

No, I believe that NBC's projection is overstated for several reasons. First, the projected cost of M&S agreements for FY 2014 from Docket No. 4364 is \$1,007,802. This amount in inconsistent with actual experience for the first 6 months of FY 2014, during which the cost of M&S agreements totaled \$345,744. Second, the FY 2014 starting point that NBC has used represents a 36 percent increase over the actual cost of M&S agreements in FY 2013 expense of \$742,665. NBC's has not provided any explanation why an increase of this magnitude will take place from FY 2013 to FY 2014. Finally, one of the causes of the projected increase in M&S agreement costs included in the FY 2014 rate year in Docket No. 4364 was the cost of new service agreements totaling \$108,434 for laboratory instruments and the new Field's Point facilities. However, all but \$3,835 of the cost for these new agreements was already incurred beginning in FY 2013.

Q. HOW ARE YOU PROPOSING TO PROJECT THE FY 2015 RATE YEAR COST OF M&S AGREEMENTS?

A. Consistent with the practice for projecting M&S agreement costs in recent dockets, as well as for other costs, I am proposing to utilize actual FY 2013 M&S costs of \$742,665 as my starting point. I have then increased these amounts to rate year levels based on the average compound rate of growth of 11.44 percent based on experience over the period FY 2011 to FY 2013. As shown on Schedule TSC-7, this results in

¹ This rate of growth differs from the 12.1 percent rate used by NBC because NBC has taken the increase from FY 2011 to FY 2013 of 24.2 percent and divided by 2. I have calculated the compound rate of growth, which accounts for the compounding of the percentage increase from year to year. To demonstrate, if the FY 2011 cost of \$597,968 is multiplied by 1 plus a growth rate of 11.44 percent (1.11444209 unrounded) two times, the result is the actual cost FY 2013 cost of \$742,665. If the same is done with NBC's rate of 12.1 percent, the calculated amount is \$751,418, a difference of nearly \$9,000.

| 1 | | rate year M&S agreement costs of \$922,306. This represents a reduction of \$138,246 |
|----|----|--|
| 2 | | compared to NBC's claimed rate year M&S agreement expense. |
| 3 | | |
| 4 | | Electricity Costs |
| 5 | Q. | WHAT ANALYSIS DID YOU UNDERTAKE WITH REGARD TO RATE |
| 6 | | YEAR ELECTRICITY COSTS IN THIS PROCEEDING? |
| 7 | A. | In its filing, NBC did not make any adjustment to the electricity costs included for the |
| 8 | | FY 2014 rate year in Docket No. 4364. Because the electricity usage included for the |
| 9 | | new Field's Point BNR facilities and the electricity generated by the new wind |
| 10 | | turbines at Field's Point were both estimated in Docket No. 4364 without the benefit |
| 11 | | of actual experience, I undertook a review of the projected electricity costs from |
| 12 | | Docket No. 4364 to ensure that the costs remain representative. |
| 13 | Q. | WHAT WERE YOUR FINDINGS? |
| 14 | A. | Based on the information provided in discovery by NBC, the electricity usage at |
| 15 | | Field's Point has been less than was projected at the time of Docket No. 4364. In |
| 16 | | addition, the electricity for Interceptor Maintenance (IM), the Central Office Building |
| 17 | | (COB) and Bucklin Point varied from the amounts included in Docket No. 4364, but |
| 18 | | overall were not significantly different. However, NBC is under a Consent |
| 19 | | Agreement to begin operating BNR facilities at Bucklin Point beginning May 1, 2014 |
| 20 | | and the electricity usage at those facilities was not considered in Docket No. 4364. |
| 21 | | Finally, the electricity produced by the wind turbines at Field's Point was 6.5 GWh |
| 22 | | during calendar year (CY) 2013, which is below the 7.1 GWh approved for the FY |
| 23 | | 2014 rate year, but well above the 5.3 GWh initially projected by NBC. |
| 24 | Q. | HAVE YOU PREPARED A SCHEDULE SHOWING YOUR |
| 25 | | ADJUSTMENT TO RATE YEAR ELECTRICITY COSTS? |

Yes, my adjustment to the rate year electricity costs included by NBC in its filing is shown on Schedule TSC-8. In developing this estimate, I have utilized the updated projections of electricity usage at each location as provided by NBC in response to DIV 2-6. The one change I made to the amounts provided in response is that I used the actual electricity generated by the wind turbines in CY 2013 rather than the straight line projection based on the last 6 months of 2013. I based my estimate on the National Grid delivery costs and the energy supply rate utilized in Docket No. 4364 because NBC indicated that those delivery rates had not changed and electricity is being supplied under a three year contract.

As shown on Schedule TSC-8, there, I have estimated net electricity costs for the rate year in this proceeding to be to be \$3,310,383. This is \$545,420 less than that the final 2014 rate year estimate of electricity costs accepted in Docket No. 4364, primarily due to lower than estimated usage at Field's Point, offset by higher usage at Bucklin Point. I would note that because the Tunnel Pump Station at Field's Point is on a separate meter from the other Field's Point facilities, I have broken the usage for this location out separately from the total Field's Point usage provided by NBC. Because a separate estimate was not provided in discovery, I based the usage at the Tunnel Pump Station on the amount accepted in Docket No. 4364 and set the usage for the other Field's Point facilities as the difference between the total provided by NBC and the Tunnel Pump Station usage.

Α.

A.

Natural Gas Costs

Q. DID YOU ALSO REVIEW NATURAL GAS COSTS?

Yes. As with electricity costs, NBC did not make any adjustment to the natural gas costs included for the FY 2014 rate year in Docket No. 4364. Therefore, I undertook

a review of natural gas costs to determine whether the amounts from Docket No. 4364 are still representative for the rate year in this proceeding.

Q. WHAT WERE YOUR FINDINGS?

I determined that the estimates of natural gas usage from Docket No. 4364 are consistent with current estimates. While the 2014 gas cost recovery (GCR) rates implemented by National Grid on November 1, 2013 were initially in line, albeit slightly higher than those used for gas supply costs in Docket No. 4364, National Grid's GCR rates beginning April 1, 2014 increased significantly as a result of the run-up in gas prices that occurred this winter due to the cold weather and the resulting supply and delivery constraints. Due to this run-up in prices, National Grid implemented a surcharge of \$0.2582 effective from April 1, 2014 through October 31, 2014 to recover roughly one-half of the projected 2014 GCR year short-fall in gas cost revenues.² The remaining short-fall will be recovered during the 2015 GCR year that begins November 1, 2014. Accordingly, I am proposing to update natural gas costs to reflect these higher supply prices.

Q. HOW DID YOU ESTIMATE THE NATURAL GAS SUPPLY RATE THAT WILL BE IN EFFECT DURING THE FY 2015 RATE YEAR?

To develop my estimate of National Grid's supply rate for the FY 2015, I started with the GCR rate that is in effect from April through October 2014, including the surcharge of \$0.2582 per therm. For FY 2015, I adjusted this rate to recognize that the remaining approximately one-half of the winter 2014 shortfall would be recovered over the full 12 months of the 2015 GCR year. Because April through October sales represent approximately 25 percent of total annual volumes, I calculated the estimated 2015 GCR rate by adjusting the 2014 GCR rate to include a surcharge of one quarter

_

A.

A.

² National Grid's 2014 GCR year runs from November 1, 2013 through October 31, 2014.

| 1 | | of the current surcharge of \$0.2582 or \$0.06455. I then calculated a composite |
|----|----|---|
| 2 | | natural gas supply rate for FY 2015 based on the use of four months of the 2014 GCR |
| 3 | | rate and eight months of the 2015 GCR rate. This calculation is shown at the bottom |
| 4 | | of page 2 of Schedule TSC-9. |
| 5 | Q. | PLEASE EXPLAIN HOW YOU USED THIS RATE TO DETERMINE |
| 6 | | YOUR UPDATED ESTIMATE OF NATURAL GAS COSTS. |
| 7 | A. | Schedule TSC-9 presents my calculation of natural gas costs based on current |
| 8 | | estimates of natural gas usage and gas supply costs. As shown on page 2 of this |
| 9 | | schedule, I started with the estimate of FY 2014 natural gas usage at each applicable |
| 10 | | location as well as the projected supply and delivery costs provided by NBC in |
| 11 | | response to DIV 1-22. I then revised the supply rate to reflect the updated supply rate |
| 12 | | for FY 2015 as discussed above to calculate projected costs at each location. As |
| 13 | | summarized on page 1 of Schedule TSC-9, I have estimated total natural gas costs for |
| 14 | | the FY 2015 rate year of \$418,633. This is \$59,418 greater than the natural gas costs |
| 15 | | included by NBC in its cost of service. |
| 16 | | |
| 17 | | Field's Point Chemical Costs |
| 18 | Q. | WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO NBC'S |
| 19 | | CLAIM FOR CHEMICAL COSTS AT THE FIELD'S POINT TREATMENT |
| 20 | | FACILITY? |
| 21 | A. | In its filing, NBC made no adjustment to the chemical costs incorporated in the FY |
| 22 | | 2014 rate year expense in Docket No. 4364. I am proposing to update chemical costs |

to reflect updated chemical quantities and prices.

23

| 1 | Q. | HAVE YOU PREPARED A SCHEDULE SHOWING YOUR ANALYSIS |
|---|----|---|
| 2 | | OF THE UPDATED CHEMICAL COSTS THAT SHOULD BE INCLUDED |
| 3 | | IN THIS PROCEEDING? |
| 4 | A. | Yes. Schedule TSC-10 presents my analysis of chemical costs for the FY 2015 rate |
| 5 | | year in this proceeding. As shown there, I have first updated the two-year average of |
| | | |

year in this proceeding. As shown there, I have first updated the two-year average of hypochlorite and bisulfate usage at Field's Point, consistent with past practice for estimating these chemical quantities.³ To estimate the polymer (sodium hydroxide) and carbon feed requirements for the Field's Point BNR facilities, I relied on the response to DIV 1-26, which provided the quantities of those chemicals purchased during the May to October 2013 permit period. Because those quantities were identified as reflecting deliveries and not necessarily use, I have assumed that 90 percent was used and 10 percent remained in inventory at the end of the permit season. Finally, for the new Bucklin Point BNR facilities, I utilized the engineer's estimates of polymer and carbon feed usage provided in response to DIV 1-23.⁴

To estimate rate year chemical costs, I multiplied my estimates of rate year quantities utilized by the most recent bid prices for each chemical. As shown on Schedule TSC-10, I have estimated total chemical costs for the rate year to be \$866,243, which is \$168,146 less than the projection from Docket No. 4364 included by NBC.

³ The costs of hypochlorite and bisulfate for the Bucklin Point are included as part of the cost of the Bucklin Point Management Contract.

⁴ These costs will be assessed to NBC through the Bucklin Point Management contract, but will be incremental to the current costs.

Management Services Expense

2 Q. WHAT ADJUSTMENTS ARE YOU PROPOSING TO MAKE TO

MANAGEMENT SERVICES EXPENSE?

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A.

I am proposing to adjust NBC's estimate of management services expense to reflect three changes. First, in response to DIV 1-27, NBC notes that it incorrectly identified the FY 2014 Bucklin Point Management Contract amount as the FY 2013 management contract amount and, as a result, overstated the FY 2015 rate year expense by applying an inflation factor for two years instead of one. I have corrected this error. Second, NBC applied an inflation rate of 3.39 percent per year to adjust the Bucklin Point contract from FY 2014 to FY 2015 levels. This percentage is the increase in the Consumer Price Index for all Urban Customers (CPI-U) for the two years from April 2011 to April 2013. The FY 2015 base contract amount will be determined based on the increase in the CPI-U from April 2013 to April 2014. Pending the release of the actual April 2014 CPI-U, I have based my estimate of the increase on the projected increase in the CPI-U from the first quarter of 2013 to the first quarter of 2014 according to the April 10, 2014 Blue Chip Economic Indicators. Third, to determine total management services expense, NBC added \$193,000 for other management and audit services to the Bucklin Point Management Contract expense. NBC indicated that it left the cost for these other services at the test year level. It is not clear where the \$193,000 NBC utilized came from, but the amounts incurred for other management and audit services was \$148,720 in FY 2011, \$67,827 in FY 2012 and \$128,581 in FY 2013. I have reduced the \$193,000 included by NBC to the FY 2013 expense of \$128,581.⁵

⁵ \$193,000 was included in Docket No 4364 as the test year amount. However, the test year in that case was FY 2012 and the response to DIV 1-28 identifies the FY 2012 cost of other Management and Audit Services as \$67,827.

| 1 | Q. | HOW DO THE THREE ADJUSTMENTS THAT YOU HAVE MADE |
|----|----|--|
| 2 | | AFFECT PROJECTED RATE YEAR MANAGEMENT SERVICES |
| 3 | | EXPENSE? |
| 4 | A. | As shown on Schedule TSC-11, I have calculated rate year management and audit |
| 5 | | services expense to be \$2,094,952. This represents a reduction of \$142,365 from |
| 6 | | NBC's filed claim. |
| 7 | | |
| 8 | | Debt Service Expense |
| 9 | Q. | WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO RATE |
| 10 | | YEAR DEBT SERVICE EXPENSE? |
| 11 | A. | I am proposing to update debt service expense to reflect NBC's current debt service |
| 12 | | schedule. NBC's principal and interest payment schedule was revised in late 2013, as |
| 13 | | a result of the issuance of new debt and the restructuring of the repayment schedule |
| 14 | | for its 2008 Variable Rate Demand Bonds. These plans were submitted and approved |
| 15 | | in Division Docket No. D-13-143. |
| 16 | Q. | WHAT DEBT SERVICE REQUIREMENTS DO YOU INCLUDE FOR THE |
| 17 | | RATE YEAR? |
| 18 | | As shown on Schedule TSC-12, I included debt service requirements of \$44,764,435 |
| 19 | | based on the payment requirements for FY 2016. This is consistent with the |
| 20 | | requirement of the Trust Indenture that revenues be sufficient to cover the highest |
| 21 | | debt service during the three year certificate period. After adding the 25 percent |
| 22 | | coverage requirement, I have determined the total amount required for debt service |
| 23 | | and coverage is \$55,955,544. This is \$162,369 less than the amount included in |
| 24 | | NBC's filing. |
| 25 | | |

| 1 | | Special Master Funds Utilization |
|----|----|--|
| 2 | Q. | PLEASE EXPLAIN YOUR RECOMMENDATION WITH REGARD TO |
| 3 | | THE UTILIZATION OF SPECIAL MASTER FUNDS. |
| 4 | A. | Beginning with Docket No. 3592, NBC began setting aside \$150,000 per year out of |
| 5 | | the Debt Service Coverage Account to be available to pay for a special master for |
| 6 | | oversight of the CSO project if the Commission appointed one. This continued |
| 7 | | through Docket No. 3707 when the Commission determined that only \$150,000 |
| 8 | | should remain set-aside for such a purpose. As a result, \$660,154 that was set aside |
| 9 | | in the Special Master Account was freed up. The Commission authorized this |
| 10 | | \$660,154 to be flowed back to customers over two years in Docket No. 3797. |
| 11 | | Since Docket No. 3797 was decided in 2007, the \$150,000 which the |
| 12 | | Commission determined should remain set aside has not been used and, with interest |
| 13 | | has grown to \$161,674. At this point, there does not appear to be any need for NBC |
| 14 | | to retain the unused Special Master funds. Therefore, I am proposing that the |
| 15 | | \$161,674 balance be returned to ratepayers over two years. I have treated this amount |
| 16 | | as a source of miscellaneous revenue in order to facilitate compliance with NBC's |
| 17 | | bond indenture, as was done in Docket No. 3797. As shown on Schedule TSC-13 |
| 18 | | this adjustment increases miscellaneous revenue by \$80,337. |
| 19 | | |
| 20 | | Operating Reserve |
| 21 | Q. | HOW HAVE YOU CALCULATED THE OPERATING RESERVE |
| 22 | | ALLOWANCE INCLUDED IN THE DIVISION'S RECOMMENDED |
| 23 | | TOTAL COST OF SERVICE? |
| 24 | A. | I have set the allowed operating reserve included in my determination of NBC's |
| 25 | | overall cost of service equal to 1.5 percent of total expenses excluding personne |
| | | |

| 1 | | services, debt service and debt coverage. This is the same method for determining |
|----|----|--|
| 2 | | NBC's operating reserve that the Commission has adopted in NBC's last rate case in |
| 3 | | Docket No. 4364. As shown on Schedule TSC-1, this results in a reduction of |
| 4 | | \$353,935 to NBC's requested operating reserve allowance based on 1.5 percent of |
| 5 | | total expenses excluding debt service and debt coverage. |
| 6 | | |
| 7 | | Rate Design |
| 8 | Q. | HOW ARE YOU PROPOSING TO DESIGN RATES TO RECOVER THE |
| 9 | | REVENUE INCREASE THAT YOU HAVE IDENTIFIED ON BEHALF OF |
| 10 | | THE DIVISION? |
| 11 | A. | For this proceeding, I am accepting NBC's proposal to recover the revenue increase |
| 12 | | through uniform percentage increases in user fee rates including residential, |
| 13 | | commercial and industrial flat fees or service charges and residential commercial, and |
| 14 | | industrial measured fees or usage charges. |
| 15 | Q. | HAVE YOU PREPARED SCHEDULES SHOWING THE CALCULATION |
| 16 | | OF THE RATES THAT YOU ARE PROPOSING? |
| 17 | A. | Yes. Schedule TSC-14 shows the derivation of the uniform percentage increase in |
| 18 | | existing rates necessary to generate the required rate increase. As shown on that |
| 19 | | schedule, the overall percentage increase in rates is 2.77 percent. |
| 20 | | Schedule TSC-15 shows the calculation of the proposed rates based on the |
| 21 | | application of the 2.77 percent increase to the current rates. Schedule TSC-15 also |
| 22 | | provides a proof of revenue at present and proposed rates. |
| 23 | Q. | DOES THIS COMPLETE YOUR TESTIMONY? |
| 24 | A. | Yes, it does. |

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BEFORE THE

PUBLIC UTILITIES COMMISSION OF RHODE ISLAND

| THE NARRAGANSETT) | | DOCKET NO 4479 |
|--------------------|---|-----------------|
| BAY COMMISSION |) | DOCKET NO. 4478 |

DIRECT TESTIMONY

OF

THOMAS S. CATLIN

ON BEHALF OF THE DIVISION OF PUBLIC UTILITIES AND CARRIERS

May 16, 2014

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, 2015

| | Rate Year Amount Per NBC | Division Adjustments | Rate Year at Present Rates | Allowable Rate Increase | Rate Year at Proposed Rates |
|-------------------------------|--------------------------------|-------------------------|----------------------------------|-------------------------------|-----------------------------------|
| Revenue | | | | | |
| User Fee Revenue | \$ 89,740,797 | \$ - | \$89,740,797 | \$2,489,039 | \$ 92,229,836 |
| Other Service Revenue | 1,476,784 | - | 1,476,784 | - | 1,476,784 |
| Miscellaneous | 1,534,090 | 142,467 | 1,676,557 | - | 1,676,557 |
| Total Revenue | \$ 92,751,671 | \$ 142,467 | \$92,894,138 | \$2,489,039 | \$ 95,383,177 |
| Expenses | | | | | |
| Personnel Services | 22,561,064 | (716,350) | 21,844,714 | - | 21,844,714 |
| Operating Supplies & Expenses | 15,277,232 | (892,243) | 14,384,989 | - | 14,384,989 |
| Professional Services | 3,080,449 | (142,365) | 2,938,084 | - | 2,938,084 |
| Capital Outlays | - | - | - | - | - |
| Amortization | - | - | - | - | - |
| Debt Service | 44,894,330 | (129,895) | 44,764,435 | - | 44,764,435 |
| Debt Coverage | 11,223,583 | (32,474) | 11,191,109 | - | 11,191,109 |
| Total Expenses | \$ 97,036,658 | \$ (1,913,327) | \$95,123,331 | \$ - | \$ 95,123,331 |
| Operating Reserve | 613,781 | (353,935) | 259,846 | | 259,846 |
| Total Cost of Service | \$ 97,650,439 | \$ (2,267,262) | \$ 95,383,177 | \$ - | \$ 95,383,177 |
| Revenue Surplus/(Deficiency) | \$ (4,898,768) | \$ 2,409,729 | \$ (2,489,039) | \$2,489,039 | \$ - |

Summary of Division Adjustments to Rate Year Revenues and Expenses at Present Rates Rate Year Ended June 30, 2015

| Description | Amount | Source | |
|---|---------------------|-----------------|--|
| Revenue Adjustments | | | |
| Revenue from REC Sales Special Master Fund Amortization | \$ 61,630 80,837 | Schedule TSC-8 | |
| Totas Division Adjustment to Revenues | \$ 142,467 | | |
| Expense Adjustments | | | |
| Personnel Expense (See Note 1) | (697,492) | Schedule TSC-3 | |
| Workers' Compensation-Old Claims | (18,858) | Schedule TSC-4 | |
| Postage Expense | (54,786) | Schedule TSC-5 | |
| Biosolids Disposal Costs | (45,063) | Schedule TSC-6 | |
| Maintenance & Service Agreements | (138,246) | Schedule TSC-7 | |
| Electricity Expense | (545,420) | Schedule TSC-8 | |
| Natural Gas Costs | 59,418 | Schedule TSC-9 | |
| Field's Point Chemicals | (168,146) | Schedule TSC-10 | |
| Management and Audit Services | (142,365) | Schedule TSC-11 | |
| Debt Service | (162,369) | Schedule TSC-12 | |
| Operating Reserve | (353,935) | See Note (2) | |
| Total Division Adjustments to Expenses | \$ (2,267,262) | | |
| Total Divison Adjustments to Operating Inccome | \$ 2,409,729 | | |

- (1) Includes \$304,328 reduction to reflect NBC's decision to eliminate clain for additional funding of non-union retirement plan.
- (2) Adjusted to reflect 1.5% of Division Operating Expenses excluding Personnel and Debt costs per Schedule TSC-1. Refer to direct testimony for explanation.

Adjustment to Personnel Costs Rate Year Ended June 30, 2015

| В | ase Salaries | | | |
|---------------------------------|--------------|-------------|----|-------------|
| | | Union | N | Non-Union |
| FY 2013 Amount (1) | \$ | 5,568,502 | \$ | 8,449,979 |
| Compensated Absences (2) | | - | | 53,900 |
| 7/1/2013 Contracted Steps (3) | | 144,301 | | - |
| Adjusted Base Salaies | \$ | 5,712,803 | \$ | 8,503,879 |
| 7/1/2013 Increase (4) | | 2.25% | | 4.15% |
| 7/1/2013 Total Salaries | \$ | 5,841,341 | \$ | 8,856,790 |
| 7/1/14 Contracted Steps (5) | | 75,618 | | - |
| Base Salary | | 5,916,960 | | 8,856,790 |
| 7/1/14 COLA/Merit (5) | | 3.00% | | 3.00% |
| Rate Year Salaries Per Division | | 6,094,468 | | 9,122,494 |
| Rate Year Salaries Per NBC (5) | | (6,308,848) | | (9,111,463) |
| Rate Year Adjustment | \$ | (214,380) | \$ | 11,031 |

| | Overti | me | | | | |
|---------------------------------|--------|-----------|----|----------|-----|------------|
| | | Union | No | on-Union | Non | -Union Ltd |
| FY 2013 Amount (1) | \$ | 439,426 | \$ | 76,451 | \$ | 23,282 |
| 7/1/2013 Contracted Steps (3) | | 10,913 | | - | | - |
| Adjusted Overtime | \$ | 450,339 | \$ | 76,451 | \$ | 23,282 |
| 7/1/2013 Increase (4) | | 2.25% | | 3.00% | | 3.00% |
| 7/1/2013 Total Overtime | \$ | 460,472 | \$ | 78,744 | \$ | 23,980 |
| 7/1/14 Contracted Steps (5) | | 5,719 | | | | - |
| Adjusted Overtime | | 466,191 | | 78,744 | | 23,980 |
| 7/1/14 COLA/Merit (5) | | 3.00% | | 3.00% | | 3.00% |
| Rate Year Overtime Per Division | \$ | 480,176 | \$ | 81,106 | \$ | 24,700 |
| Rate Year Overtime Per NBC (5) | | (477,134) | | (72,665) | | (23,301) |
| Rate Year Adjustment | \$ | 3,042 | \$ | 8,441 | \$ | 1,399 |

| Capitalized Salaries | | | | |
|---|--|--|--|--|
| | Salary Reimbursement Account 59000 | Fringe Reimbursement Account 59001 | | |
| FY 2013 Amount (1) 7/1/2013 Increase (4) | \$ (1,236,491) 1.0415 | \$ (670,080) 1.0415 | | |
| 7/1/2014 Increase (5) | 1.0300 | 1.0300 | | |
| Rate Year Reimbursement Per Division Rate Year Reimbursement Per NBC (5) | (1,326,440) 1,209,343 | (718,825) 660,799 | | |
| Rate Year Adjustment | \$ (117,097) | \$ (58,026) | | |

Adjustment to Personnel Costs Rate Year Ended June 30, 2015

| | FICA Taxes | | |
|-----------------------------|-----------------|---------------|-------------|
| | F | Total FICA | |
| | Social Security | Medicare | |
| Rate Year Salaries | \$ 15,216,962 | \$ 15,216,962 | - |
| Overtime & Limited | 585,983 | 585,983 | |
| Wages Over FICA Limit | (120,000) | | |
| Wages Subject to FICA | 15,682,945 | 15,802,945 | - |
| Percent | 6.20% | 1.45% | |
| Rate Year FICA Per Division | 972,343 | 229,143 | 1,201,485 |
| Rate Year FICA Per NBC (5) | | | (1,216,056) |
| Rate Year Adjustment | | | \$ (14,571) |

| | Retiremen | t Benefits | | | | |
|--|-----------|---------------------|----|-----------------------|----|-------------------------|
| | R | Union letirement | Un | ion Retiree Health | _ | Non-Union Retirement |
| Salaries Overtime & Limited | \$ | 6,094,468 | \$ | 6,094,468 | \$ | 9,122,494 105,806 |
| | | 6,094,468 | | 6,094,468 | | 9,228,300 |
| Employer Contribution Rate (5) | | 24.33% | | 6.75% | | 10% |
| Increase to Maximum per Actuary Report | | 1,482,784 | | 411,377 | | 922,830 |
| Rate Year FICA Per Division | | 1,482,784 | ' | 411,377 | | 922,830 |
| Rate Year FICA Per NBC (5) | | (1,534,943) | | (425,847) | | (1,173,533) |
| Rate Year Adjustment | \$ | (52,159) | \$ | (14,470) | \$ | (250,703) |

- (1) Amounts per Schedule WEE-3.(2) Reflects FY 2013 amount per response to COMM 1-32.
- (3) Per Schedule WEE-4 in Docket No. 4364(4) Per response to DIV 1-6.
- (5) Per Schedule WEE-4.

Adjustment to Workers' Compenstion Claims Expense Rate Year Ended June 30, 2015

| | A | mount |
|--------------------------------------|----|----------|
| Ongoing Worker's Comp-Old Claims (1) | \$ | 23,388 |
| Amount per NBC (2) | | 42,246 |
| Adjustment to Rate Year Expense | \$ | (18,858) |

- (1) Per supplemental response to DIV. 1-12.
- (2) Per Schedule WEE-1.

Adjustment to Postage Expense Rate Year Ended June 30, 2015

| | Amount | | |
|---------------------------------------|----------------|--|--|
| FY 2013 Postage Expense (1) | \$ 371,359 | | |
| FY 2013 Bills (2) | 977,919 | | |
| Average Postage expense per bill | \$ 0.3797 | | |
| Postage Increases (3) | \$ 0.035 | | |
| Adjusted Postage per Bill | \$ 0.4147 | | |
| Number or Bills (2) | 977,919 | | |
| Adjusted Postage Expense per Division | \$ 405,586 | | |
| Amount per NBC (1) | 460,372 | | |
| Adjustment to Rate Year Expense | \$ (54,786) | | |

- (1) Per Schedule WEE-6.
- (2) Per response to DIV 1-13.
- (3) Per response to DIV 1-14. Reflects one-half year effect of \$0.01 increase on January 27, 2013 and full annual effect of \$0.03 increase on January 26, 2014.

Adjustment to Biosolids Disposal Costs Rate Year Ended June 30, 2015

| | 7/1/2013 to 12/31/2013 | /1/2014 to 6/30/2014 | | Total |
|---------------------------------------|---------------------------|-------------------------|------------|-----------|
| Field's Point-Dry Tons (1) | 4,682 | 4,682 | | 9,364 |
| Bucklin Point-Dry Tons (1) | 1,050 | 1,050 | . <u>-</u> | 2,100 |
| Total Biosolids for Disposal-Dry Tons | 5,732.0 | 5,732.0 | | 11,464 |
| Rate per Ton (2) | \$ 429.72 | \$ 438.33 | i | |
| Biosolids Disposal Costs | \$ 2,463,155 | \$ 2,512,508 | \$ | 4,975,663 |
| Amount per NBC (1) | | | | 5,020,726 |
| Adjustment to Rate Year Expense | | | \$ | (45,063) |

Notes:

(2) Rates caluclated as follows:

| Disposal rate for Calendar Year 2013 | \$ 425.72 |
|--|--------------|
| Increase in CPI for Boston Area from November 2012 to November 2013 | 1.009 |
| Disposal rate for Calendar Year 2014 | \$ 429.72 |
| Projected increase in CPI-U from 4Q14 to 4Q15 per Blue Chip Econmic Indicators dated 4/10/2014 | 1.0200 |
| Disposal rate for Calendar Year 2014 | \$ 438.33 |

⁽¹⁾ Per Schedule WEE-7.

Adjustment to Maintenance & Service Agreement Costs Rate Year Ended June 30, 2015

| | Amount |
|---|-----------------|
| FY 2013 Maintenance & Service Agreement Expense (1) | \$ 742,665 |
| Annual Escalation Rate (2) | 1.1144 |
| Rate Year Allowance for Existing Agreements (3) | \$ 922,306 |
| Amount per NBC (1) | 1,060,552 |
| Adjustment to Rate Year Expense | \$ (138,246) |

- (1) Per Schedule WEE-8.
- (2) Based on compound annual growth rate from FY 2011 to FY 2013.
- (3) Reflects escalation for 2 years from FY 2013 to FY 2015 11.44% per year.

Adjustment to Electricity Costs to Reflect Updated Supply Costs and Offset for REC Revenues Rate Year Ended June 30, 2015

| | | Cost per NBC (1) | per | Cost Division (2) | Þ | Adjustment |
|--|----|----------------------|-----|----------------------|----|-------------|
| Field's Point Field's Point | \$ | 1,140,063 | | 1,495,366 | | |
| New Operations Bldg. BNR Facilities | • | 72,381 1,141,598 | | , , <u>-</u> | | |
| Subtotal | \$ | 2,354,043 | \$ | 1,495,366 | \$ | (858,677) |
| Tunnel Pump Station Turbines | | 710,568 (708,885) | | 710,568 (650,035) | | - 58,849 |
| Bucklin Point (3) | | 1,155,276 | | 1,429,257 | | 273,981 |
| Interceptor Maintenance | | 131,948 | | 110,719 | | (21,229) |
| СОВ | | 151,301 | | 152,958 | | 1,657 |
| Total Electricity Cost | \$ | 3,794,253 | \$ | 3,248,833 | \$ | (545,420) |
| Plus: Turbine O&M | | 62,000 | | 62,000 | | |
| Total Electricty Costs | \$ | 3,856,253 | \$ | 3,310,833 | \$ | (545,420) |
| Revenue from REC Sales (4) | \$ | 355,650 | \$ | 417,280 | \$ | 61,630 |

- (1) Per WEE-R8 Detail and Updated Schedule TSC-9 in Catlin surrebuttal in Docket No. 4364.
- (2) Per page 2 of this schedule. Amounts for Field's Point Operations Building and BNR Facilities are not separately metered and are included as part of line labeled Field's Point.
- (3) Division amount Includes estimated usage of new BNR facilities at Bucklin Point.
- (4) Division amount based on 6,520 MWh of RECs generated in CY 2013 and a price of \$64 based on actual sale price for first and second quarter RECs per DIV 1-24.

Adjustment to Electricity Costs to Reflect Updated Supply Costs and Offset for REC Revenues Rate Year Ended June 30, 2015

DETAIL (1)

| | СОВ | FP | TPS | New Ops | BNR Turbines | FP Total | ВР | IM |
|-----------------------|------------|--------------|------------|---------------|---------------------------------------|--------------|--------------|------------|
| FY 2014 Projected kWh | 1,411,900 | 14,901,132 | 6,411,600 | - | - | 21,312,732 | 13,906,095 | 841,997 |
| Generated (2) | | | | | (6,522,501) | | | |
| 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. | \$ 9,900 | \$ 9,900 | \$ 9,900 | \$ - \$ | - \$ - | \$ 19,800 | \$ 9,900 | \$ 14,940 |
| Supply | 90,503 | | 410,984 | · · | - (418,092) | | 891,381 | 53,972 |
| Avg. Delivery per kwh | 41,720 | - | 239,840 | _ | - (184,149) | • | 424,343 | 34,565 |
| Capacity Charge | 4,717 | - | 21,423 | _ | - (21,793) | • | 46,464 | 2,813 |
| Subtotal | \$ 146,840 | * | \$ 682,146 | \$ - \$ | · · · · · · · · · · · · · · · · · · · | \$ 1,493,664 | \$ 1,372,088 | \$ 106,290 |
| Gross Earnings Tax | \$ 6,118 | \$ 59,814 | \$ 28,422 | \$ - \$ | - \$ (26,001) | \$ 62,235 | \$ 57,169 | \$ 4,429 |
| Total | \$ 152,958 | \$ 1,495,366 | \$ 710,568 | \$ - \$ | - \$ (650,035) | \$ 1,555,899 | \$ 1,429,257 | \$ 110,719 |

⁽¹⁾ All amounts per WEE-R8 Detail in Docket 4364 except FY 2015 kWh usage per response to DIV 2-6.

Adjustment to Natural Gas Costs to Reflect National Grid Gas Supply Costs for the Rate Year Rate Year Ended June 30, 2015

| | Per | Cost Division (1) |
|---------------------------------|-----|----------------------|
| Field's Point | | 242,385 |
| Bucklin Point | | 109,829 |
| Interceptor Maintenance | | 23,211 |
| COB | | 27,481 |
| Lab | | 15,727 |
| Total | \$ | 418,633 |
| Amount per NBC (2) | | 359,215 |
| Adjustment to Natural Gas Costs | \$ | 59,418 |

- (1) Division amounts per page 2 of this schedule.
- (2) Per Schedule WEE-1.

Adjustment to Natural Gas Costs to Reflect National Grid Gas Supply Costs for the Rate Year Rate Year Ended June 30, 2015

DETAIL (1)

| | | | | | | | | | | | ۱., | | | | | | | | | | | | _ | |
|--------------------------|----|--------|----|--------|----|----------|----|---------|----|---------|-----|---------|----|---------|----|---------|----|--------|----|---------|----|--------|----------|--------|
| | | | | | | | | | | | | | | | | | | | | | | | | |
| | | COB | BF | Admin | Е | 3P Plant | Е | 3P Exch | | BP | | FP | F | P Admin | | TPS | | ESPS | | FP | | IM | | Lab |
| FY 2015 Projected Therms | | 23,141 | | 5,663 | | 30,403 | | 48,191 | | 84,257 | | 89,805 | | 36,658 | | 55,585 | | 22,663 | | 204,711 | | 14,229 | | 12,163 |
| Rates: | | | | | | | | | | | | | | | | | | | | | | | | |
| Customer Charge | \$ | 70.00 | \$ | 70.00 | \$ | 175.00 | \$ | 175.00 | | | \$ | 175.00 | | | \$ | 175.00 | \$ | 70.00 | | | \$ | 70.00 | \$ | 70.00 |
| Avg. Delivery / Therm | | 0.3239 | | 0.3458 | | 0.3860 | | 0.4377 | | | | 0.3334 | | 0.3334 | | 0.3239 | | 0.4059 | | | | 0.7316 | , | 0.3935 |
| Supply (2) | | 0.7917 | | 0.7917 | | 0.7917 | | 0.7917 | | | | 0.7917 | | 0.7917 | | 0.7672 | | 0.7917 | | | | 0.7917 | | 0.7917 |
| Cost: | | | | | | | | | | | | | | | | | | | | | | | | |
| Customer Charge | \$ | 840 | \$ | 840 | \$ | 2,100 | \$ | 2,100 | \$ | 5,040 | \$ | 2,100 | \$ | - | \$ | 2,100 | \$ | 840 | \$ | 5,040 | \$ | 840 | \$ | 840 |
| Delivery | | 7,495 | | 1,958 | | 11,736 | | 21,093 | | 34,788 | | 29,941 | | 12,222 | | 18,004 | | 9,199 | | 69,366 | | 10,410 | | 4,786 |
| Supply | | 18,321 | | 4,483 | | 24,070 | | 38,153 | | 66,706 | | 71,099 | | 29,022 | | 42,645 | | 17,942 | | 160,708 | | 11,265 | | 9,629 |
| Subtotal | \$ | 26,656 | \$ | 7,282 | \$ | 37,906 | \$ | 61,346 | \$ | 106,534 | \$ | 103,140 | \$ | 41,244 | \$ | 62,749 | \$ | 27,981 | \$ | 235,114 | \$ | 22,515 | \$ | 15,256 |
| Cross Fornings Toy | Φ | 004 | φ | 225 | φ | 1,172 | ው | 1 007 | φ | 2 205 | φ | 2 100 | Φ | 1.076 | φ | 1 0 4 1 | φ | 065 | \$ | 7,272 | φ | 606 | c | 470 |
| Gross Earnings Tax | \$ | 824 | \$ | 225 | \$ | 1,172 | Ф | 1,897 | \$ | 3,295 | \$ | 3,190 | \$ | 1,276 | \$ | 1,941 | \$ | 865 | Ф | 1,212 | Ф | 696 | \$ | 472 |
| | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | \$ | 27,481 | \$ | 7,507 | \$ | 39,079 | \$ | 63,243 | \$ | 109,829 | \$ | 106,329 | \$ | 42,519 | \$ | 64,689 | \$ | 28,847 | \$ | 242,385 | \$ | 23,211 | \$ | 15,727 |

- (1) Per response to DIV 1-22 except Supply rate per Note (2).
- (2) Reflects Composite of following National Grid 2014 GCR rate for 4 Months and 2015 GCR rate for 8 months:

| | | High Load | | |
|----------------|-------------|------------|---------------|--|
| | <u>Line</u> | Factor | All Other | |
| 2014 GCR Rate | (1) | \$ 0.63810 | \$ 0.66260 | |
| 2014 surcharge | (2) | \$ 0.25820 | \$ 0.25820 | surchage effective April-October 2014 |
| Adjusted rate | (3)=(1)+(2) | \$ 0.89630 | \$ 0.92080 | |
| 2015 Surcharge | (4) | 0.06455 | 0.06455 | 1/4 of surcharge to reflect annual volumes |
| 2015 GCR Rate | (5)=(1)+(4) | \$ 0.70265 | \$ 0.72715 | |
| Weighted Rate | (6) | \$ 0.76720 | \$ 0.79170 | 4/12 x line 3 +8/12 x line 5 |

Adjustment to Field's Point and Bucklin Point Chemicals Costs Rate Year Ended June 30, 2015

| | Нурос | chlorite (1) | Bis | sulfate (1) | Pol | ymer (2) (Tons) | | Carbon eed (2) | | Total |
|---------------------------------|-------|--------------|-----|-------------|-----|--------------------|----|-------------------|----|-----------|
| FY 2012 Gallons | | 450,103 | | 193,037 | | | | | | |
| FY 2013 Gallons | | 575,050 | | 199,570 | | | | | | |
| Average Field's Point | | 512,577 | | 196,304 | | 377 | | 68,182 | | |
| FY 2013 Bucklin Point (3) | | N/A | | N/A | | 8.3 | | 24,000 | | |
| Total | | 512,577 | | 196,304 | | 385 | | 92,182 | | |
| Unit Price (4) | \$ | 0.5611 | \$ | 1.3772 | | 477.17 | | 1.52 | | |
| Annualized Espense | \$ | 287,607 | \$ | 270,349 | \$ | 183,925 | \$ | 140,117 | \$ | 881,998 |
| Amount per NBC (5) | | 369,547 | | 311,329 | | 196,468 | | 172,800 | | 1,050,144 |
| Adjustment to Rate Year Expense | \$ | (81,940) | \$ | (40,980) | \$ | (12,543) | \$ | (32,683) | \$ | (168,146) |

- (1) FY 2012 Gallons per WEE-11 in Docket No. 4364. FY 2013 Gallons per response to DIV 1-26.
- (2) Carbon Feed and Polymer quantities per response to DIV 1-26. Amounts for Bucklin Point reflect engineer's estimates. Amounts provided for Field's Point reflect purchases rather than chemicals used and have been reduced by 15% to reflect carryover inventory.
- (3) Per response to DIV 1-26 and supplemental information per letter dated January 28, 2014.
- (4) Per Schedule WEE-R9 in Docket No. 4364.

Adjustment to Management and Audit Services Costs Rate Year Ended June 30, 2015

| | Amount | | | |
|--|--------|-----------|--|--|
| FY 2014 Bucklin Point Base Contract (1) | \$ | 1,912,350 | | |
| Projected Increase in CPI-U (2) | | 1.0140 | | |
| Estimated FY 2015 Bucklin Point Contract | \$ | 1,966,271 | | |
| Other Management and Audit Expense (3) | | 128,581 | | |
| Total Management and Audit Serivces Expense per Division | \$ | 2,094,852 | | |
| Amount per NBC (4) | | 2,237,217 | | |
| Adjustment to Rate Year Expense | \$ | (142,365) | | |

- (1) Per Schedule WEE-13.
- (2) Based on compound annual growth rate from FY 2011 to FY 2013.
- (3) Per response to DIV 1-28. Reflects FY 2013 actual amount.
- (4) Per Schedule WEE-13.

Adjustment to Debt Service Expense Rate Year Ended June 30, 2015

| | Amount |
|---------------------------------|------------------|
| Total Debt Service (1) | \$ 44,764,435 |
| Coverage Requirement at 25% | \$ 11,191,109 |
| Total Debt Service and Coverage | \$ 55,955,544 |
| Amount per NBC (2) | 56,117,913 |
| Adjustment to Rate Year Expense | \$ (162,369) |

- (1) Per response to DIV 1-39. Reflects FY 2016 expense.
- (2) Per Schedule WEE-1.

Adjustment to Return Unused Special Master Funds Rate Year Ended June 30, 2015

| | Amount | | |
|-----------------------------------|--------|---------|--|
| Special Master Fund Balance | \$ | 161,674 | |
| Amortiazation Period | | 2 | |
| Annual Amortization | \$ | 80,837 | |
| Amount per NBC Filing | | - | |
| Increase in Miscellaneous Revenue | \$ | 80,837 | |

⁽¹⁾ Per response to COMM 1-47.

Calculation of Uniform Percentage Increase Based on Division Recommended Revenue Increase Rate Year Ended June 30, 2015

| Division Recommended Revenue Increase (1) | \$ 2,489,039 |
|--|------------------|
| Devenues from Comisses Cubicet to Incress (2) | |
| Revenues from Services Subject to Increase (2) | |
| Flat Fees-Residential | \$ 23,895,712 |
| Measured Fees-Residential | 27,511,057 |
| Flat Fees-Commercial and Industrial | 14,468,800 |
| Measured Fees-Commecial | 22,569,231 |
| Measured Fees-Industrial | 1,295,997 |
| Total Revenue Subject to Increase | 89,740,797 |
| | |
| Uniform Percentage Increase | 2.77% |

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

Calculation of Proposed Rates and Proof of Revenues at Present and Proposed Rates Rate Year Ended June 30, 2015

| Flat Fees | | Current Rate | Increase | Proposed Rates | Billing Units (1) | Revenue at Present Rates | Revenue at Proposed Rates | |
|-------------------------|---------|------------------|----------------|------------------------|----------------------|--------------------------------|-------------------------------------|--|
| Residential | \$ | 202.47 | 2.77% | \$ 208.09 | 118,021 | \$23,895,712 | \$ 24,558,480 | |
| Commercial & Industrial | | | | | | | | |
| Meter Size | | | | | | | | |
| 5/8" | \$ | 484 | 2.77% | 497.00 | 3,685 | 1,783,540 | 1,831,445 | |
| 3/4" | | 723 | 2.77% | 743.00 | 1,016 | 734,568 | 754,888 | |
| 1" | | 1,202 | 2.77% | 1,235.00 | 1,161 | 1,395,522 | 1,433,835 | |
| 1.5" | | 2,413 | 2.77% | 2,480.00 | 843 | 2,034,159 | 2,090,640 | |
| 2" 3" | | 3,853 | 2.77% | 3,960.00 | 1,457 | 5,613,821 | 5,769,720 | |
| 3 4" | | 7,219 | 2.77% | 7,419.00 | 84 41 | 606,396 | 623,196 | |
| 4 6" | | 12,030 | 2.77% 2.77% | 12,364.00 24,737.00 | 41 52 | 493,230 | 506,924 | |
| ზ 8" | | 24,069 38,509 | 2.77% 2.77% | 24,737.00 39,577.00 | 52 13 | 1,251,588 500,617 | 1,286,324 514,501 | |
| 0 10" | | 55,359 | 2.77% | 56,894.00 | 13 | 55,359 | • | |
| 10 | | 55,559 | 2.1170 | 50,694.00 | | 55,559 | 56,894 | |
| Total Commercial & Indu | ıstrial | Flat Fees | | | 8,353 | \$14,468,800 | \$ 14,868,367 | |
| Measured Fees | | | | | | | | |
| Residential | \$ | 3.267 | 2.77% | 3.358 | 8,420,893 | 27,511,057 | 28,277,359 | |
| Commercial | | 4.738 | 2.77% | 4.869 | 4,763,451 | 22,569,231 | 23,193,243 | |
| Industrial | | 3.046 | 2.77% | 3.130 | 425,475 | 1,295,997 | 1,331,737 | |
| Total Measured Fees | | | | | | \$51,376,285 | \$ 52,802,338 | |
| Other Revenue | | | | | | \$ 3,153,341 | \$ 3,153,341 | |
| Total Revenue | | | | | | \$92,894,138 | \$ 95,382,527 | |
| Target Revenue (2) | | | | | | | 95,383,177 | |
| Variance | | | | | | | \$ (650) | |

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