BEFORE THE

PUBLIC UTILITIES COMMISSION

OF RHODE ISLAND

CITY OF NEWPORT)	
UTILITIES DEPARTMENT,)	DOCKET NO. 4595
WATER DIVISION)	

DIRECT TESTIMONY

OF

STACY L. SHERWOOD

ON BEHALF OF THE
DIVISION OF PUBLIC UTILITIES AND CARRIERS

APRIL 14, 2016



ASSOCIATES, INC. 10480 Little Patuxent Parkway Suite 300 Columbia, Maryland 20904

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BEFORE THE

PUBLIC UTILITIES COMMISSION

OF RHODE ISLAND

		CITY OF NEWPORT) UTILITIES DEPARTMENT,) DOCKET NO. 4595 WATER DIVISION)				
		Direct Testimony of Stacy L. Sherwood				
1		<u>Introduction</u>				
2	Q.	WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS				
3		ADDRESS?				
4	A.	My name is Stacy L. Sherwood. I am an Economist with Exeter Associates, Inc.				
5		("Exeter"). Our offices are located at 10480 Little Patuxent Parkway, Suite 300,				
6		Columbia, Maryland 21044. Exeter is a firm of consulting economists specializing in				
7		issues pertaining to public utilities.				
8	Q.	WOULD YOU PLEASE DESCRIBE YOUR QUALIFICATIONS, WORK				
9		EXPERIENCE AND EDUCATIONAL BACKGROUND?				
10	A.	I have six years of experience in the energy sector, related specifically to the review				
11		and development of energy efficiency and demand response programs and policies				
12		for the use of advanced technologies for pollution prevention and energy efficiency.				
13		With Exeter, I have provided technical support and analysis to state and federal				
14		clients on energy efficiency, distributed resources, demand response, and renewable				
15		energy. While serving as Assistant Director of the Energy Analysis and Planning				
16		Division of the Maryland Public Service Commission, I oversaw the utilities energy				
17		efficiency and demand response programs, participated in smart grid work groups,				
18		and assisted with the composition of Maryland's Ten-Year Plan regarding the state's				

1		energy outlook. I hold a Bachelor's Degree in Accounting, Business, and Economics
2		from McDaniel College.
3	Q.	HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY
4		PROCEEDINGS ON UTILITY ISSUES?
5	A.	Yes. I have previously presented testimony before the Maryland Public Service
6		Commission regarding automated metering infrastructure ("AMI") costs and
7		associated staffing in Potomac Electric Power Company's base rate case, Docket No.
8		9311. Recently, I testified on behalf of the Pennsylvania Office of Consumer
9		Advocate regarding Duquesne Light Company's Modified AMI Plan and Phase III
10		Energy Efficiency Plan, Docket Nos. P-2015-2497267 and M-2015-2515375, PPL
11		Electric Utilities Corporation's Phase III Energy Efficiency Plan, Docket No. M-
12		2015-2515642, and UGI Utilities Inc.'s Phase II Energy Efficiency Plan, Docket No.
13		M-2015-2477174.
14	Q.	ON WHOSE BEHALF ARE YOU APPEARING?
15	A.	I am presenting testimony on behalf of the Division of Public Utilities and Carriers
16		(the "Division").
17	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?
18	A.	Exeter was retained by the Division to assist it in the evaluation of the rate filing
19		submitted by the City of Newport Utilities Department, Water Division ("Newport
20		Water" or the "Water Division") to the Public Utilities Commission of Rhode Island
21		("Commission") on December 23, 2015. This testimony presents my findings and
22		recommendations with regard to the overall revenue increase to which Newport
23		Water is entitled.
24	Q.	HAVE YOU PREPARED SCHEDULES TO ACCOMPANY YOUR
25		TESTIMONY?

1	A.	Yes. I have prepared Schedules SLS-1 through SLS-8. Schedule SLS-1 provides a
2		summary of revenues and expenses under present and proposed rates. Schedules
3		SLS-2 through SLS-8 present my adjustments to Newport Water's claimed revenue
4		requirement.
5	Q.	WHAT TIME PERIODS HAVE YOU UTILIZED IN MAKING YOUR
6		DETERMINATION OF NEWPORT WATER'S REVENUE
7		REQUIREMENTS?
8	A.	Consistent with Newport Water's filing, I utilized a test year that corresponds to the
9		fiscal year ("FY") ended June 30, 2015 and a rate year that corresponds to the FY
10		ending June 30, 2017 as the basis for determining the Water Division's revenue
11		requirements and the revenue increase necessary to recover those requirements.
12	Q.	WHAT IS YOUR RECOMMENDATION WITH REGARD TO THE
13		APPROPRIATE INCREASE IN REVENUES IN THIS PROCEEDING?
14	A.	As shown on Schedule SLS-1, it is my recommendation that Newport Water receive a
15		revenue increase of \$963,158 in this proceeding. That recommendation is \$333,966
16		less than the increase of \$1,297,124 that Newport Water has requested in this case.
17		Schedule SLS-2 lists the seven specific adjustments I'm recommending to Newport
18		Water's revenue requirement that total \$333,966.
19	Q.	HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?
20	A.	In the remainder of my testimony, I document and explain each of the seven revenue
21		requirement adjustments I'm recommending that the Commission approve. My
22		discussion of these adjustments is organized into sections corresponding to the issue
23		being addressed. These sections are set forth in the Table of Contents for this
24		testimony.
25		

1		Existing Base Charge Revenue
2	Q.	PLEASE SUMMARIZE NEWPORT WATER'S CALCULATION OF
3		EXISTING CUSTOMER BASE CHARGE REVENUE.
4	A.	Newport Water calculated existing customer base charge revenue of \$851,329 by
5		multiplying the monthly base charge for the 5/8" customer connection size of \$4.89
6		per meter by an annualized meter count of 174,096 meters (i.e., existing meters
7		multiplied by 12 months). This method of calculating base charge revenue
8		understates the revenue Newport Water collects from base charges because Newport
9		Water's base charges for other customer connection sizes are greater than the \$4.89,
10		with the single exception being the Portsmouth base charge.
11	Q.	HOW SHOULD EXISTING BASE CHARGE REVENUE BE
12		CALCULATED?
13	A.	I recommend that existing base charge revenue be calculated as the sum of existing
14		base charges multiplied by annualized meter counts for each customer connection
15		size. This is the same method Newport Water uses to calculate its proposed base
16		charge revenue, as well as the existing and proposed rates for private fire protection.
17		When existing base charge revenue is calculated as I recommend, Newport Water's
18		existing base charge revenue increases from \$851,329 to \$934,255, for a difference of
19		\$82,926. Schedule SLS-3 shows the calculation of my proposed \$82,926 reduction to
20		Newport Water's revenue requirement.
21		
22		Employee Vacancies
23	Q.	PLEASE SUMMARIZE NEWPORT WATER'S CALCULATION OF
24		SALARIES AND WAGES EXPENSE.

1	A.	Newport Water calculated salaries and wages expense based on the projected FY
2		2017 salaries for its full complement of 49 full-time employees, including the five
3		employees that are shared with the City of Newport wastewater utility. This includes
4		the new Water Account Clerk discussed in the Direct Testimony of Julia Forgue.
5	Q.	IS THAT METHOD OF CALCULATING SALARIES AND WAGES
6		EXPENSE REASONABLE?
7	A.	No. Over the prior three years, FY 2013 through FY 2015, Newport averaged at least
8		two unfilled positions. During the FY 2015 test year in this case, Newport Water
9		held two positions (an Engineering Technician and Water Lab-Microbiologist) vacant
10		for a majority of the year. Due to the fact that employee vacancies occur as the result
11		of normal employee turnover, it is unreasonable to assume that there will be no
12		employee vacancies during the FY 2017 rate year.
13	Q.	HOW DO YOU RECOMMEND THAT SALARIES AND WAGES
14		EXPENSE BE CALCULATED?
15	A.	I recommend that salaries and wages expense, and associated benefits expense, be
16		calculated to reflect an average of two vacant positions. To calculate the adjustment
17		to rate year expenses for these vacant positions, I utilized Newport Water's average
18		salaries and benefits expenses projected for the FY 2017 rate year for the two current

vacant positions. I chose those positions to calculate my adjustment because they

represent the current vacancies and the salaries for those positions are below the

average Newport Water salary of \$53,497, so I consider my adjustment to be

conservative. As shown on Schedule SLS-4, this adjustment reduces rate year

salaries and wages expense by \$101,758, with a total reduction of \$154,902 after

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accounting for reduced benefits expense.

1		Accrued Benefits Buyout
2	Q.	PLEASE SUMMARIZE NEWPORT WATER'S PROPOSED ACCRUED
3		BENEFITS BUYOUT EXPENSE.
4	A.	Newport Water included \$59,002 associated with accrued buyout expenses in its
5		projected rate year Administration expense. That figure was calculated by
6		multiplying the average cost of accrued paid and sick leave per employee by an
7		estimate of three employees retiring per year. In its calculation of the average cost
8		per employee of accrued paid leave expense, Newport Water divided total accrued
9		paid leave expense by 46 employees, which reflects the total number of current
10		employees. When calculating the average cost per employee of accrued sick leave
11		expense, Newport Water divided total accrued sick leave expense by the number of
12		employees with sick time expense accrued, or 29 employees.
12	0	IS NEWDORT WATER'S CALCULATION OF ACCRUED DENEEDS
13	Q.	IS NEWPORT WATER'S CALCULATION OF ACCRUED BENEFITS
14		EXPENSE REASONABLE?
15	A.	No. Newport Water's calculation is significantly higher than the actual accrued
16		benefits paid out in FY 2014 and FY 2015. For those two years, the average buyout
17		was \$21,086, with two buyouts in FY 2014 and three buyouts in FY 2015. I
18		recommend that the accrued benefits buyout expense be set as that level. As shown
19		on Schedule SLS-5, my recommended accrued benefits buyout adjustment reduces
20		rate year expenses by \$37,918.
21		
22		
23		Consultant Fees
24	Q.	PLEASE SUMMARIZE NEWPORT WATER'S FILED CLAIM FOR
25		CONSULTANT FEES.

1	A.	Newport Water has included \$250,000 in rate year Administration expense for
2		consultant fees. Newport indicated that \$31,731 is forecasted as typical business
3		consulting expenses, and the remaining \$218,269 are related to rate case expenses.
4	Q.	IS THAT A REASONABLE EXPENSE LEVEL FOR RATE CASE AND
5		CONSULTING EXPENSES?
6	A.	Not with regard to rate case expenses. The rate case amounts for legal fees, financial
7		consultant and PUC (i.e., Division) fees are higher than those incurred in FY 2012
8		and FY 2013, which was the last two-year time period following a rate case. The
9		average rate case expense for those two years was \$172,777.
10	Q.	WHAT ADJUSTMENTS ARE YOU PROPOSING TO NEWPORT
11		WATER'S CLAIM FOR THE RATE CASE CONSULTANT FEES?
12	A.	I calculated my proposed adjustment to the rate case consultant fees to be the
13		difference between Newport Water's projected rate case expense of \$218,269 and the
14		average FY 2012/FY 2013 rate case expense of \$172,777. As shown in SLS-6, this
15 16		resulted in a \$45,492 adjustment to rate case expense.
17		Telephone and Communications
18	Q.	WHAT ADJUSTMENT ARE YOU PROPOSING TO MAKE TO
19		TELEPHONE AND COMMUNICATION EXPENSE?
20	A.	In its filing, Newport Water used estimated telephone and communication expense for
21		FY 2015 that included the annual monthly service charge for a tablet at \$896.
22		Newport Water has since reduced that estimated cost to \$480. As shown on Schedule
23		SLS-7, this adjustment results in a reduction in telephone and communication
24		expense of \$416.
25		

1		Self-Insurance
2	Q.	HOW DID NEWPORT WATER DEVELOP ITS ESTIMATE OF SELF-
3		INSURANCE?
4	A.	Newport Water developed its estimated rate year self-insurance expense by using the
5		same assumption used in prior rate cases—that each claim would cost \$2,500 and
6		approximately four claims would be awarded each year.
7	Q.	IS THAT METHOD OF ESTIMATING SELF-INSURANCE EXPENSE
8		REASONABLE?
9	A.	No. On average, there have been two claims per year during FY 2013 through FY
10		2015. Therefore, I recommend that self-insurance expense be determined using an
11		estimate of two claims per year. Utilizing Newport Water's estimate cost of \$2,500
12		per claim, I calculated self-insurance expense as \$5,000, not the \$10,000 proposed by
13		Newport Water as shown on Schedule SLS-8.
14		
15		Operating Reserve
16	Q.	PLEASE EXPLAIN YOUR ADJUSTMENT TO OPERATING RESERVE?
17	A.	Newport Water assumes an operating reserve of three percent of its operation and
18		maintenance ("O&M") expenses. Therefore, Newport Water's operating reserve
19		should be reduced by three percent of my \$243,728 in recommended reductions to
20 21 22		O&M expenses, or \$7,312 as shown on Schedule SLS-2.
23 24		Capital and Debt Service Expenses
25	Q.	WHAT CHANGES IS NEWPORT WATER PROPOSING WITH RESPECT
26		TO ITS CAPITAL AND DEBT SERVICE EXPENSES?

- 1 A. Newport Water is seeking a \$680,502 increase in rates to fund capital projects on a 2 pay-as-you-go basis. The capital projects that will be funded were submitted to the 3 Rhode Island Department of Health as part of Newport Water's five-year update to its 4 Infrastructure Replacement Plan ("IRP"). Newport Water is not proposing to fund 5 any new capital projects through the issuance of debt and has proposed no change to 6 its debt service expense. 7 Q. ARE NEWPORT WATER'S PROPOSED CAPITAL AND DEBT SERVICE
- 8 EXPENSES REASONABLE?
 9 A. Yes. Newport Water's IRP is used as the basis for determining rate increases
 10 associated with capital and infrastructure improvements, so its requested rate increase
 11 for capital expenses is reasonable. In addition, I have reviewed Newport Water's

projected rate year debt service expenses and find them to be reasonable.

- 13 Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY?
- 14 A. Yes, it does.

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BEFORE THE

PUBLIC UTILITIES COMMISSION

OF RHODE ISLAND

CITY OF NEWPORT)	
UTILITIES DEPARTMENT,)	DOCKET NO. 4595
WATER DIVISION)	

SCHEDULES ACCOMPANYING THE

DIRECT TESTIMONY

OF

STACY L. SHERWOOD

ON BEHALF OF THE DIVISION OF PUBLIC UTILITIES AND CARRIERS

APRIL14, 2016

EXETER

ASSOCIATES, INC. 10480 Little Patuxent Parkway Suite 300 Columbia, Maryland 20904

Summary of Revenues and Expenses at Present and Proposed Rates Rate Year Ending June 30, 2017

	Rate Year			Rate Year	
	Amount Per	Division		at Present	
Description	Newport ⁽¹⁾	Adjustments		Rates	
Revenue		·			
Base Charge	\$ 851,329	\$	82,926	\$ 934,255	
Retail Consumption	12,102,538			12,102,538	
Wholesale/Bulk Sales	3,839,806			3,839,806	
Fire Protection	1,400,643			1,400,643	
Miscellaneous	735,029			735,029	
Total Revenue	\$18,929,345	\$	82,926	\$19,012,271	
Expenses					
Administration	\$ 2,437,846	\$	(88,826)	\$ 2,349,020	
Customer Service	731,100			731,100	
Source of Supply-Island	759,549			759,549	
Source of Supply-Mainland	223,955			223,955	
Treatment & Pumping-Station One	1,937,458			1,937,458	
Treatment & Pumping-Lawton Valley	2,292,814			2,292,814	
Water Laboratory	265,738		(77,451)	188,287	
Transmission & Distribution Maintenance	1,264,600		(77,451)	1,187,149	
Fire Protection	23,800			23,800	
Subtotal	\$ 9,936,861	\$	(243,728)	\$ 9,693,133	
Debt Service	\$ 6,811,000			\$ 6,811,000	
Capital Outlays	3,180,502			3,180,502	
Total Expenses	\$19,928,363	\$	(243,728)	\$19,684,635	
Operating Reserve	298,106		(7,312)	290,794	
Total Cost of Service	\$20,226,469	\$	(251,040)	\$19,975,429	
Revenue Surplus/(Deficiency)	\$ (1,297,124)	\$	333,966	\$ (963,158)	
Division Recommended Revenue Change				\$ 963,158	

 $[\]underline{\text{Note:}}^{\text{(1)}}$ Per HJS Schedule A-4 and HJS Schedule A-1A.

Summary of Division Adjustments to Rate Year Revenue and Expenses Rate Year Ending June 30, 2017

Description	,	Amount	Source
Existing Base Charge Revenue	\$ 82,926		Schedule SLS-3
O&M Expenses			
Employee Vacancies	\$	154,902	Schedule SLS-4
Accrued Benefits Buyout		37,918	Schedule SLS-5
Consultant Fees		45,492	Schedule SLS-6
Telephone & Communications		416	Schedule SLS-7
Self-Insurance		5,000	Schedule SLS-8
Subtotal	\$	243,728	
Operating Reserve Adjustment ⁽¹⁾		7,312	
O&M Total	\$	251,040	
Total Division Adjustments	\$	333,966	

Note:

(1) Based on 3.0% of total O&M expense adjustments.

Adjustment to Existing Customer Base Charge Revenue Rate Year Ending June 30, 2017

Description	Existing Rate Docket 4355 ⁽¹⁾		Number of Meters ⁽²⁾			
Amount Per Newport						
Base Charge (per bill) (Monthly)	\$	4.89	174,096	\$	851,329	
Amount Per Division						
Base Charge (per bill) (Monthly)						
5/8	\$	4.89	10,724	\$	629,284	
3/4		5.01	2,474		148,737	
1		6.07	564		41,082	
1.5	8.78		369		38,878	
2	11.35		268		36,502	
3		25.22	58		17,553	
4		28.90	17		5,896	
5		33.80	-		-	
6		37.48	32		14,392	
8		47.29	1		567	
10		65.07	1		781	
Portsmouth Base Charge (4")	2.86		17		583	
				\$	934,255	
Adjustment to Existing Customer						
Base Charge Revenue				\$	82,926	

Notes:
(1) Per HJS Schedule A-2.

⁽²⁾ Per HJS Schedule D-1.

Adjustment to Salaries and Wages Expense Rate Year Ending June 30, 2017

Description	Salary ⁽¹⁾	Benefits ⁽²⁾	Adjustment		
Current Vacant Positions ⁽³⁾					
Engineering Technician	\$ 50,641	\$ 31,507	\$ 82,148		
Water Lab - Microbiologist	51,117	21,637	72,754		
Average for Claimed Salaries and Benefits Average Employee Vacancies ⁽⁴⁾	\$ 50,879 (2)	\$ 26,572 (2)	\$ 77,451 (2)		
Reduction in Salaries and Wages	\$ (101,758)	\$ (53,144)	\$ (154,902)		
Adjustment to Salaries and Wages Expense			\$ 154,902		

⁽¹⁾ Per response to DIV 1-18a.

⁽²⁾ Per response to DIV 1-18b.

⁽³⁾ Per response to COMM 1-1.

⁽⁴⁾ See testimony.

Adjustment to Accrued Buyout Expense Rate Year Ending June 30, 2017

Description	Amount Per Newport ⁽¹⁾		nount Per Division ⁽²⁾	Ac	Adjustment		
Accrued Benefits Buyout	\$	59,004	\$ 21,086	\$	(37,918)		
Adjustment to Accrued Buyout Expense				\$	37,918		

- (1) Per response to DIV 1-18g.
- (2) See testimony.

Adjustment to Consultant Fees Rate Year Ending June 30, 2017

Description	Amount Per Newport ⁽¹⁾			Y 2012 / FY 2013 Average ⁽²⁾	Ad	Adjustment	
Rate Case Expense	\$	\$ 218,269		172,777	\$	(45,492)	
Adjustment to Consulting Fees					\$	45,492	

⁽¹⁾ Per responses to Div. 1-17 and DIV. 3-7.
(2) Refer to testimony.

Adjustment to Telephone & Communication Expense Rate Year Ending June 30, 2017

Description	Amount Per Newport ⁽¹⁾		mount Per Division ⁽²⁾	Ac	Adjustment		
On Call-Backhoe	\$	360.03	\$ \$ 360.03		-		
Meter Repair		361.77	361.77		-		
Director		630.04	630.04		-		
On Call-Collection		362.10	362.10		-		
Distribution Supervisor		630.04	630.04		-		
Assignment Phone		359.80	359.80		-		
On Call-Distribution		362.05	362.05		-		
WTP Supervisor		630.04	630.04		-		
Meter Supervisor		374.66	374.66		-		
Distribution Foreman		359.80	359.80		-		
Transmission and Distribution Dept.		359.80	359.80		-		
Dig Safe Tablet		895.80	480.00		(415.80)		
New Equipment Charges		330.02	330		-		
Total Telephone & Communication Expense	\$	6,015.95	\$ 5,600.15	\$	(415.80)		
Adjustment to Telephone &							
Communication Expense				\$	416		

⁽¹⁾ Per response to Div. 1.3c.

Per response to DIV 3-1.

Adjustment to Self-Insurance Expense Rate Year Ending June 30, 2017

Description	Amount Per Newport ⁽¹⁾		 ount Per vision ⁽²⁾	Ad	justment
Cost Per Claim Total Number of Claims	\$	2,500 4	\$ 2,500 2		
Total Self-Insurance Expense	\$	10,000	\$ 5,000	\$	(5,000)
Adjustment to Self-Insurance Expense				\$	5,000

⁽¹⁾ Per HJS Schedule D-9.

⁽²⁾ Per response to DIV 3-9b.