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November 26, 2018

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

Re: Docket No. 4890- The Narragansett Bay Commission General Rate Filing

Dear Ms. Massaro:

Enclosed please find:

1. The Narragansett Bay Commission's Response to the Division of Public Utilities and Carriers Data Requests (Set One).

This response does not include the response to Division 1-26 and 1-27. The responses to these data requests will be submitted in a supplemental filing.

Please note that due to the voluminous nature of this response, and in consultation with the Commission and Division, this filing contains one hard copy and four thumb drives. Also, please note that an electronic copy of this document has been provided to the service list.

Thank you for your attention to this matter.

Sincerely,

Joseph A. Keough, Jr.

JAK/kf

cc: Docket 4890 Service List (via electronic mail)

Div. 1-1: Please provide in electronic (Excel or Excel compatible) format copies of all schedules and workpapers created in the process of filing the current rate increase request.

Response: Please see Microsoft Excel file 'NBC_Schedules HJS 1-32_FINAL'.

Prepared by: Harold Smith

Div. 1-2 Please provide in electronic (Excel or Excel compatible) format copies of Narragansett Bay Commission's revenue requirement, cost of service study, cost allocation and recovery study, and rate design workpapers in the current rate increase request including all of the HJS Schedules attached to Narragansett Bay Commission witness Harold J. Smith's direct testimony.

Response: Please see Microsoft Excel file 'NBC_Schedules HJS 1-32_FINAL'.

Prepared by: Harold Smith

Div. 1-3: Please provide in electronic (Excel or Excel compatible) format copies of Narragansett Bay Commission witness Kathryn Kelly's Schedules and Exhibits.

Response: Not applicable.

Prepared by: Kathryn Kelly

Div. 1-4: To the extent not already being provided in response to DRs 1-1 through 1-3, provide Excel files, with formulas intact, for the Exhibits filed with NBC's application that were prepared in Excel.

Response: Please see Microsoft Excel file 'NBC_Schedules HJS 1-32_FINAL'.

Prepared by: Harold Smith

Div. 1-5: To the extent not already being provided in response to DRs 1-1 through 1-3, provide all Excel file workpapers for calculations supporting the Direct Testimony and Exhibits that were filed with NBC's application.

Response: Please see Microsoft Excel file 'NBC_Schedules HJS 1-32_FINAL'.

Prepared by: Harold Smith

Div. 1-6: Please provide a complete copy of Narragansett Bay Commission's current chart of accounts.

Response: See attachment 1-6 Chart of Accounts.

Prepared by: Leah Foster

Div. 1-7: Please provide copies of Narragansett Bay Commission's detail general ledger for fiscal year 2018 (12 months ending June 30, 2018), and for the months from July 2018 through the present that are available.

Response: See attachments –

1-7 NBC General Ledger FY 20181-7 NBC General Ledger FY 2019

Prepared by: Leah Foster

Div. 1-8: Provide copies of NBC's capital and operating budgets for fiscal years 2019 and 2020.

Response: See attachments -

1-8 FY 2019 Budget 1-8 CIP FY 2020-2024

NBC has not prepared its FY 2020 budget. NBC does prepare a five-year Capital Improvement Program and the FY 2020-2024 CIP is included as part of this response.

Div. 1-9: Provide copies of NBC's audited financial statements, including notes to the financial statements, for fiscal years 2017 and 2018.

Response: See attachments -

1-9 NBC CAFR FY 2017 1-9 NBC CAFR FY 2018

Div. 1-10: Please provide copies of Narragansett Bay Commission's annual variance reports for fiscal years 2017 and 2018 that compare, reconcile and explain differences between actual operating results and forecast or budget operating results.

Response: See attachments -

1-10 Budget vs. Actual FY 2017 and FY 2018.

Prepared by: Harold Smith

Div. 1-11: Please provide a detailed comparison between Narragansett Bay Commission's fiscal year 2016, 2017 and 2018 forecast construction expenditures and actual construction expenditures.

Response: NBC updates its capital cash flows periodically as additional design work is completed or once projects are bid. The forecast capital improvement expenditures are those included in NBC's budget.

Capital Improvements	FY 2016	FY 2017	FY 2018
Budget	\$ 33,641	\$ 40,356	\$ 48,011
Actual	24,391	36,400	33,812

Div. 1-12: Please provide a complete copy of the presentations to the Board which resulted in the Board approval of Narragansett Bay Commission's rate filing. Also provide a copy of the Board approval.

Response: See attachments –

1-12 Signed Authorizing Board Resolution – General Filing.

1-12 Filing Board Memo (Memo to the Finance Committee and Board of Commissioners).

Div. 1-13: Please provide, in Excel, the trial balance for the fiscal years ending June 30, 2015, 2016 2017 and 2018. Please provide the information by account and subaccount.

Response: See attachments -

1-13 NBC Trial Balance Combined Detail FY2018

1-13 NBC Trial Balance FY151-13 NBC Trial Balance FY161-13 NBC Trial Balance FY17

Prepared by: Leah Foster

Div. 1-14: Please provide the Narragansett Bay Commission operating budgets for fiscal years 2018, 2019 and 2020.

Response: See attachments -

1-14 FY 2018 Budget 1-14 FY 2019 Budget

FY 2020 has not yet been prepared.

Div. 1-15: Please provide the Narragansett Bay Commission capital budgets and capital spending forecasts for fiscal years 2018, 2019 and 2020. If available in Excel, please include the Excel version with your response.

Response:

Operating Capital	FY 2018	FY 2019 Ytd. (Oct-2018)*	
Budget	\$5,311,000	\$ 4,752,000	
Actual	4,233,915	842,941	

^{*} Budget is full year

NBC has not prepared the FY 2020 Operating Capital Budget.

Div. 1-16: Please provide a detailed breakout of Miscellaneous Revenues, by component, for each of the five fiscal years through June 30, 2018.

Response:

Narragansett Bay Commission Miscellaneous Revenue

	2015	2016	2017	2018
Operating				
RECS Income	482,048.00	360,850.00		
Returned check fees	4,280.00	5,840.00	4,320.00	20,670.00
Abatement Fee	2,952.00	3,296.00	2,808.00	2,188.00
Real Estate Closing Fee				15,990.00
Miscellaneous income		2,274.20		
	489,280.00	372,260.20	7,128.00	38,848.00
Non-Operating				
Discount earned	2,810.00	4,099.52	4,070.14	4,743.44
Miscellaneous income	52,820.00	96,408.61	144,100.15	30,733.03
Rent income	108,004.00	103,346.83	104,337.34	79,475.00
	163,634.00	203,854.96	252,507.63	114,951.47

Prepared by: Leah Foster

Div. 1-17: Was any expense for incentive compensation or bonuses incurred during the test period? If so, identify, quantify and explain such expense.

Response: Yes. Sick bonus payments of \$16,642.40 and Certification Stipend payments of \$6,000 were paid in the test year. For a description of these payments, please see response to Division 1-18.

Div. 1-18: Please provide complete copies of any and all incentive compensation programs in effect during the test year.

Response:

Collective Bargaining Agreement Language re: Stipends

5.1 Advancement Incentive and Stipend - The NBC agrees to pay a stipend on a one-time only basis during the course of this Agreement in the amount of five hundred (\$500) dollars payable within thirty (30) days of NBC's receipt of proof that an employee has obtained a level of certification beyond that required by his current job classification after the employee's date of hire. There shall be no pyramiding of this benefit. In addition to paying the aforementioned stipend, the NBC shall also upgrade an Operator I to Operator II when he obtains an Operator II license and provides said proof within thirty (30) days of receipt of such proof.

Collective Bargaining Agreement Language re: Sick Leave Bonus

12.6B On an annual basis the sick leave bonus period will begin at the start of the first pay period in November and end in the last pay period of October the following year, if a non-probationary employee discharges a limited amount of sick leave and has no leave without pay, he shall be eligible to receive a cash bonus as follows:

Hours Used Hours Used Cash

35-Hour Employee	40-Hour Employee	Bonus
0-21	0-24	\$200
21.1-35	24.1 -40	\$150
35.1-49	40.1-56	\$100
49.1 - over	56.1 - over	-0-

Non-Union Employee Handbook Language re: Sick Leave Bonus 408 SICK LEAVE BONUS

On an annual basis (first pay period in November through last pay period in October), if a regular full-time employee discharges a limited amount of sick leave plus non-disciplinary leave without pay, he/she shall be eligible to receive a cash bonus as follows:

Hours Used	Hours Used	
35-Hour Employee	40-Hour Employee	Cash Bonus
0 - 21	0 - 24	\$200
21.1 – 35	24.1 - 40	\$150
35.1 - 49	40.1 - 56	\$100
49.1 - over	56.1 - over	\$ -0-

Div. 1-19: Please provide the number of employees in each job title in fiscal years 2016, 2017 and 2018 and as of September 30, 2018.

Response: See attachment 1-19 Employees-Job Titles.

Div. 1-20: Please provide the number of employees in each job title in budgeted or projected for fiscal years 2019 and 2020.

Response: See attachment 1-20 for the FY 2019 Budgeted Positions. NBC has not prepared its

FY 2020 budget.

Div. 1-21: Please provide the following for each employee position during the test year that experienced a change of incumbent (1) during the test year and separately (2) subsequent to the test year:

- a. position title;
- b. employee replaced;
- c. annual salary of replaced employee;
- d. replacement employee;
- e. annual salary of replacement employee; and
- f. date of replacement.

Response: See attachment 1-21 Replaced Employees.

Div. 1-22: Please provide the following monthly labor data for the test year ending June 30, 2018, previous 3 years, and since for each month the end of the test year, showing annual totals: Also, please provide new monthly data as it becomes available through the course of this proceeding.

- a. number of actual employees broken down between type (e.g., salaried, hourly, union, non-union, temporary, etc.);
- b. number of authorized employees broken down between type (e.g., salaried, hourly, union, non-union, temporary, etc.);
- c. regular payroll broken down between expensed, capitalized and other;
- d. overtime payroll broken down between expensed, capitalized and other;
- e. temporary payroll broken down between expensed, capitalized and other; and
- f. other payroll (specify)

Response:

a. See attachments -

1-22 List of Employees by Month FY 2015

1-22 List of Employees by Month FY 2016

1-22 List of Employees by Month FY 2017

1-22 List of Employees by Month FY 2018

1-22 List of Employees by Month FY 2019

Please note: **1010, 2884, 1033** denotes Union/Hourly employees **NONE** denotes Non-Union, Salaried employees

b. See attachments -

1-22 List of Employees by Month FY 2015

1-22 List of Employees by Month FY 2016

1-22 List of Employees by Month FY 2017

1-22 List of Employees by Month FY 2018

1-22 List of Employees by Month FY 2019

Please note: **1010, 2884, 1033** denotes Union/Hourly employees **NONE** denotes Non-Union, Salaried employees

- c. See attachment 1-22 Payroll expensed & capitalized by month.
- d. See attachment 1-22 Payroll expensed & capitalized by month.
- e. Temporary employees are paid through 52680 Clerical Services.
- f. See attachment 1-22 Payroll expensed & capitalized by month (limited).

Prepared by: Diane Buerger and Leah Foster

Div. 1-23: Please provide the actual number of employees for each month in 2016, 2017 and 2018 to date, and the estimated number of employees for each month of 2018 through 2020.

Response: See attachments -

1-22 List of Employees by Month FY 2015

1-22 List of Employees by Month FY 2016

1-22 List of Employees by Month FY 2017

1-22 List of Employees by Month FY 2018

1-22 List of Employees by Month FY 2019

Please note: 1010, 2884, 1033 denotes Union/Hourly employees

NONE denotes Non-Union, Salaried employees

Div. 1-24: Please provide the contract with NBC and Raftelis for services related to the current rate case.

Response: See Attachment - 1-24 NBC & Raftelis Contract.

Div. 1-25: When does NBC plan on filing its next rate case?

Response: Depending on the outcome of this filing, NBC does not plan on filing for general rate relief until FY 2021. In addition, if NBC is successful with its application for WIFIA funding, rate relief may be needed to demonstrate debt service and debt service coverage.

Div. 1-28: Refer to the Harold Smith testimony at page 2, lines 4-8. Identify and provide the information on declining consumption that was evaluated for a historical trend and identify and provide the trend analysis.

Response: As shown in the table below, the residential and commercial classes have experienced declining consumption. The rate year (FY 2020) estimate assumes FY 2018 consumption, reduced by the average change experienced by the customer class over the last three years. The Residential class has experienced an average annual reduction in consumption from FY 2015 to FY 2018 of 1% (average of -2.2%, +1.9%, and -2.7% equals -1.0%), while the Commercial class has experienced an average annual reduction of 0.5% (average of 0.0%, -0.3%, and -1.3% equals -0.5%), over the same period.

	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	Average Annual Change in Consumption (FY15-FY18)
Customer Usage (HCF) Residential Change	8,484,354	8,300,215 -2.2%	8,457,830 1.9%	8,233,501 -2.7%	8,233,501 -1.0%
Commercial Change	4,771,357	4,771,320 0.0%	4,755,534 -0.3%	4,694,089 -1.3%	4,694,089 -0.5%

Prepared by: Harold Smith

Div. 1-29: Refer to the Harold Smith testimony at page 2, lines 20-26, and page 3, lines 9-18. Concerning the sale of Renewable Energy Credits (RECs), provide the following information for fiscal year 2018 and as projected/budgeted for fiscal year 2019 and 2020:

- a. the number of RECs sold
- b. the proceeds from selling the RECs
- c. a description of how NBC generated the RECs, including a detailed description of renewable generating resources that NBC has.
- d. how NBC assigns or allocates a portion of its cost of producing renewable energy to the cost of the RECs.
- e. whether NBC separates its cost of renewable energy generation into cost for (1) capacity, (2) energy and (3) RECs, and details of how NBC makes such cost allocations.
- f. identification of any other costs related to selling the RECs such as broker fees, tracking system fees, etc.
- g. details of how NBC accounts for the REC creation, inventory, sales and retirements.

Response:

RECs	Sold
FY 2018 Actual	17,281
FY 2019 Budget	24,191
FY 2020 Projected	20,481

- b. The proceeds from FY 2018 REC sales was \$264,810.25. NBC's budget for RECs sold in FY 2019 is \$393,099 and FY 2020 is projected to be \$422,421
- c. NBC owns and operates three 1.5 MW wind turbines located at the Field's Point, three 1.5 MW wind turbines located in Coventry, RI and has executed a Power Purchase Agreement (PPA) for three solar power projects located in Richmond, RI. All three installations generate renewable energy credits.
- d. NBC does not allocate a portion of its cost of producing renewable energy to the cost of the RECs.
- e. NBC does not separate its cost of renewable energy generation into cost for (1) capacity, (2) energy and (3) RECs.
- f. Cost related to selling the RECs include the following:
 - Tracking System Fees NEPOOL GIS
 - Brokerage Fees (if applicable) DayMark Energy Advisors and Karbone Inc.
 - Monitoring and Certification Services Green Development
- g. NBC accounts for the creation, inventory, sales and retirements of RECs using the New England Power Pool Generation Information System (NEPOOL GIS). The NEPOOL GIS issues and tracks RECs for all MWh of generation produced in the ISO New England control area. For each MWh (1,000 KWh) that NBC generates from its renewable energy sources it records one Renewable Energy Credit. The MWh's are imported into the NEPOOL GIS by National Grid if they are using their meter, or an approved third party meter reader and the system reflects the corresponding quantity of RECs generated.

Prepared by: Mike Cook

Div. 1-30: Provide copies of invoices for health care premiums in fiscal year 2018 and for each month beyond June 30, 2018 for which an invoice has been received.

Response: Please note that NBC also funded HSA's as part of the Health Insurance Plan in the amount of \$675,000 in FY 2018.

Div. 1-31: Do employees or retirees make any contributions towards the cost of health insurance? If not, explain fully why not. If so, identify, quantify and explain the employee and retiree contributions.

Response: Employees health insurance contributions are the lesser of 3.25% of employee's base wages or 20.00% of premium for single coverage or the lesser of 8.75% of employee's base wages or 20.00% of premium for family coverage. Non-union retirees do not have NBC sponsored health insurance. Union retires receive health insurance benefits through the State of Rhode Island and in accordance with that plan do not make any contributions to health insurance.

Div. 1-32: Provide copies of invoices for biosolids disposal in fiscal year 2018 and for each month beyond June 30, 2018 for which an invoice has been received.

Response: See attachments as follows:

1-32 Biosolids FY18 1-32 Biosolids FY19

Prepared by: Leah Foster

Div. 1-33: Provide a copy of the biosolids contract including documentation for the most recently available price adjustments.

Response: See attachment 1-33 Biosolids Contract.

Prepared By: Laurie Horridge

Div. 1-34: Identify and provide the two most recent actuarial reports for the following:

- a. Union Pension plan
- b. Non-Union Pension plan
- c. Union Retirement Health plan
- d. Non-union retirement health plan

Response:

- a. See 1-34 A Actuarial Reports for the ERSRI Plan for 2017 and 2016.
- b. See 1-34 B Actuarial Reports for the Non-Union Plan for 2017 and 2016.
- c. See 1-34 C Actuarial Reports for the State of RI Union Retirement Plan for 2017 and 2015.
- d. N/A

Div. 1-35: Provide copies of invoices for employer contributions to the following pension and retirement health plans in fiscal year 2018 and for each month beyond June 30, 2018 for which an invoice has been received:

- a. Union Pension plan
- b. Non-Union Pension plan
- c. Union Retirement Health plan
- d. Non-union retirement health plan

Response: NBC is not invoiced for contributions to any of the plans listed above rather NBC makes bi-weekly payments based on a percentage of compensation.

Div. 1-36: Workers compensation dividend.

- a. Identify and provide the documentation for the workers compensation insurance dividend mentioned in the Harold Smith testimony at page 7, lines 13-14.
- b. Were any workers compensation refunds or dividends received in any prior years? If so, identify the amounts and years.

Response:

- a. See attachment 1-36 Workers Comp Dividends.
- b. See below:

FY 2015 \$8,033 FY 2016 \$0 FY 2017 \$7,796 FY 2018 \$3,093

Div. 1-37: Identify and provide a copy of NBC's most recent depreciation rates study.

Response:

Narragansett Bay Commission Depreciation Rates

	Asset	Life
Category	Account	Years
Automotive Equipment	16510	5
Building & Plant Equipment	16520	7
Construction Equipment	16530	5
Education & REC Equipment	16540	5
Medical Surg & Lab Equipment	16570	5
Office (Furniture & Equip)	16580	5
Computer Software	16583	5
Computer Hardware	16585	3
Other (Equipment)	16590	7
Replacement Reserve	16600	5
Buildings & Other Structure	16610	50
Other (Improv Not Bldg or Structure)	16630	7
Land	16640	Non Depreciable
Construction in Progress	16700	Non Depreciable
Capital Projects Completed		
Tunnels	16650	100
NBC Interceptor Easements	16650	100
Rehabilitation Interceptors	16650	60
Interceptor Replacement	16650	60
Improvements	16650	30
Building	16650	30
NBC System Wide Facilities Plan	16650	30
Energy Project - Wind Turbines	16650	20
Pump Station Improvements	16650	20
Tunnel pump Station Improvements	16650	20
Pipe Lining	16650	15
Pumps	16650	10
Cleaning & Inspection of Interceptors	16650	5
Projects (Labor Only)	16650	5
Studies (with a product)	16650	5
, , , , ,		

Div. 1-38: Identify and provide all cost support relied upon for NBC's proposed Collection Notice Posting fee.

Response: The Collection Notice Posting Fee is set forth in Schedule HJS – 4 of the filing. The fee is for the recovery of administrative and personnel costs incurred to post a collection notice on the property of a customer. The fee is calculated based on personnel time used to process and post the notice, multiplied by their expense rate. It also includes an NBC overhead rate of 55%. The charge is then rounded up to the nearest dollar.

Div. 1-39: Refer to the Harold Smith testimony at page 11, lines 14-15.

- a. For fiscal year 2018 identify the amount of revenue collected for NBC customer accounts through the water termination and lien sale process.
- b. For fiscal year 2018 identify the amount of cost incurred by NBC related to having NBC customer accounts collected through the water termination and lien sale process.

Response:

- a. In fiscal year 2018, NBC collected \$ 4,768,648 through the water termination process and \$790,520.99 through the lien sale process.
- b. NBC estimates FY 2018 costs of \$159,000 for water termination postings and \$700 for lien sale postings in FY 2018. In addition to the posting expense, NBC incurs labor and overhead for the other aspects of the collection process performed by NBC's Legal and Collections staff as part of the water termination and lien sale process.

Div. 1-40: Identify and provide all cost support relied upon for NBC's proposed Pretreatment Annual Permit fees.

Response:

The proposed number of distinct Pretreatment Annual Permit fees have been reduced to three categories: Tier I – Significant Industrial Users, Tier II – Non-Significant Industrial Users, and Tier III – Commercial Users. The fees seek to recover the administrative and personnel costs incurred to process and review the application. The fees are calculated by identifying the task, the time required to complete the task, the job title required to complete the task, the hourly expense rate corresponding to that position title. The fees also include an NBC overhead rate of 55%. The detailed tables showing the calculations for each permit category were provided in Schedule HJS – 32 and are also attached to this response. Note that the fees were rounded to the nearest one hundred dollars.

	Tier I - Si	ignificant Indi	ustrial Us	ers				
Task	Person	Time (mins)	Hourly Rate	Overhead (@ 55%)	Total Hourly Rate	Total Cost	# of Users Permitted annualy	Rate Year Revenue
Mail Processing (includes logging and scanning)	Clerks	10	\$ 24.55	\$ 13.50	\$ 38.05	\$ 6.34		
Supervisor Mail Review and Processing	Manager, Assistant Manager, Principal PT Engineer	10	43.97	24.18	68.15	11.36		
Application Review	Engineer	15	24.40	13.42	37.82	9.46		
File/Plan Review	Engineer	180	24.40	13.42	37.82	113.46		
Meeting and or Inspection	Engineer	120	24.40	13.42	37.82	75.64		
Permit Writing	Engineer	90	24.40	13.42	37.82	56.73		
Supervisor Initial Review	Assistant Manager or Principal PT Engineer	45	39.46	21.70	61.16	45.87		
Typing (including corrections)	Clerk	120	24.55	13.50	38.05	76.11		
Proof Reading	Engineer	45	24.40	13.42	37.82	28.37		
Supervisor Final Review	Assistant Manager or Principal PT Engineer	27	39.46	21.70	61.16	27.52		
Manager Review	Manager	30	53.00	29.15	82.15	41.08		
Permit Processing (typing supporting documents, copying)	Clerks	30	24.55	13.50	38.05	19.03		
Signing & Tracking	Manager	10	53.00	29.15	82.15	13.69		
Total: Direct Sewer Connection	on Application Cost (rounded)					\$ 500	14	\$ 7,000

	Tier II - Nor	n-Significant I	ndustrial	Users				
Task	Person	Time (mins)	2.50(0.00000	Overhead (@ 55%)	Total Hourly Rate	Total Cost	# of Users Permitted annualy	Rate Year
Mail Processing (includes logging and scanning)	Clerks	10	\$ 24.55	\$ 13.50	\$ 38.05	\$ 6.34		
Supervisor Mail Review and Processing	Manager, Assistant Manager, Principal PT Engineer	10	43.97	24.18	68.15	11.36		
Application Review	Engineer or Tech	30	24.76	13.62	38.38	19.19		
File/Plan Review	Engineer or Tech	60	24.76	13.62	38.38	38.38		
Meeting and or Inspection	Engineer or Tech	60	24.76	13.62	38.38	38.38		
Permit Writing	Engineer or Tech	45	24.76	13.62	38.38	28.78		
Supervisor Initial Review	Assistant Manager or Principal PT Engineer	30	39.46	21.70	61.16	30.58		
Typing (including corrections)	Clerk	60	24.55	13.50	38.05	38.05		
Proof Reading	Engineer or Tech	45	24.76	13.62	38.38	28.78		
Supervisor Final Review	Assistant Manager or Principal PT Engineer	20	39.46	21.70	61.16	20.39		
Manager Review	Manager	10	53.00	29.15	82.15	13.69		
Permit Processing (typing supporting documents, copying)	Clerks	20	24.55	13.50	38.05	12.68		
Signing & Tracking	Manager	10	53.00	29.15	82.15	13.69		
Total: Indirect Sewer Connect	ion Application Cost					\$ 300	46	\$ 13,800

	Tier	III - Commerc	ial Hears					
Task	Person	Time (mins)		Overhead (@ 55%)	•	Total Cost	# of Users Permitted annualy	Rate Year Revenue
Mail Processing (includes logging and scanning)	Clerks	10	\$ 24.55	\$ 13.50	\$ 38.05	\$ 6.34		
Supervisor Mail Review and Processing	Manager, Assistant Manager, Principal PT Engineer	10	43.97	24.18	68.15	11.36		
Application Review	Tech	15	24.94	13.72	38.66	9.66		
File/Plan Review	Tech	10	24.94	13.72	38.66	6.44		
Meeting and or Inspection	Tech	30	24.94	13.72	38.66	19.33		
Permit Writing	Tech	10	24.94	13.72	38.66	6.44		
Supervisor Initial Review	Assistant Manager or Principal PT Engineer	10	39.46	21.70	61.16	10.19		
Typing (including corrections)	Clerk	30	24.55	13.50	38.05	19.03		
Proof Reading	Engineer or Tech	10	24.76	13.62	38.38	6.40		
Supervisor Final Review	Assistant Manager or Principal PT Engineer	10	39.46	21.70	61.16	10.19		
Manager Review	Manager	5	53.00	29.15	82.15	6.85		
Permit Processing (typing supporting documents, copying)	Clerks	20	24.55	13.50	38.05	12.68		
Signing & Tracking	Manager	10	53.00	29.15	82.15	13.69		
Total: Indirect Sewer Connect	ion Application Cost					\$ 140	300	\$ 42,000

Total Annual Pretreatment Permit Fees \$ 62,800

Div. 1-41: Identify and provide all cost support relied upon for NBC's proposed new sewer connection fees.

Response: The sewer connection application fees are for the recovery of the administrative and personnel costs incurred related to the review and processing of and application for a new connection to NBC's system. The fees are calculated by identifying the task, the time required to complete the task, the job title required to complete the task, and the hourly expense rate corresponding to that job title. The fees also include an NBC overhead rate of 55%. The detailed tables showing the calculations for the two types of sewer connection applications; Direct Sewer Connection Application and Indirect Sewer Connection Application, were provided in Schedule HJS-18 and are also shown below. Note that the fees were rounded to the nearest one hundred dollars.

Direct Sew	ver Connection Application	on Cost				
					Total	
		Time	Hourly	Overhead	Hourly	Total
Task	Person	(mins)	Rate	(@ 55%)	Rate	Cost
INTERCEPTOR MAINTENANCE REVIEW						
1. Review permit application package for completeness	Permits Coordinator	15	\$ 25.00	\$ 13.75	\$ 38.75	\$ 9.69
2. Scan plans and prepare GIS, google maps	Permits Coordinator	15	25.00	13.75	38.75	9.69
3. Complete permit input in permit program	Permits Coordinator	25	25.00	13.75	38.75	16.15
4. Request review by IM	Permits Coordinator	5	25.00	13.75	38.75	3.23
a. Direct Connection Plan Review	Senior Technical Assistant	45	36.00	19.80	55.80	41.85
i. Inspection at site	Senior Technical Assistant	75	36.00	19.80	55.80	69.75
ii. Process Report/Pictures	Senior Technical Assistant	20	36.00	19.80	55.80	18.60
iii. Transportation	Senior Technical Assistant	45	36.00	19.80	55.80	41.85
ENGINEERING REVIEW						
6. Prepare fee memo deliver check to accounting ACCOUNTING PROCESSES CHECK	Permits Coordinator	10	25.00	13.75	38.75	6.46
a. Send Checks to Customer Service for deposit	Staff Accountant	10	36.00	19.80	55.80	9.30
b. When deposit is confirmed pick up checks	Staff Accountant	10	36.00	19.80	55.80	9.30
c. Process information in Oracle	Staff Accountant	10	36.00	19.80	55.80	9.30
ENGINEERING	Stan Accountant	10	30.00	15.00	33.00	3.30
7. Prepare letters, forms, permit and labels	Permits Coordinator	25	25.00	13.75	38.75	16.15
8. Enter information into NBC-GIS program	Permits Coordinator	15	25.00	13.75	38.75	9.69
9. Scan file information	Permits Coordinator	15	25.00	13.75	38.75	9.69
10. Mail and/or call permittee	Permits Coordinator	5	25.00	13.75	38.75	3.23
11. Enter scanned information into sharepoint files	Permits Coordinator	15	25.00	13.75	38.75	9.69
Total: Direct Sewer Connection Application Cost (round	led)					\$ 300.00

Indirect Sev	wer Connection Applicat	ion Cost				
Task	Person	Time (mins)	Hourly Rate	Overhead (@ 55%)	Total Hourly Rate	Total Cost
INTERCEPTOR MAINTENANCE REVIEW		()		(6 1111)		
1. Review permit application package for completeness	Permits Coordinator	15	\$ 25.00	\$ 13.75	\$ 38.75	\$ 9.69
2. Scan plans and prepare GIS, google maps	Permits Coordinator	15	25.00	13.75	38.75	9.69
3. Complete permit input in permit program	Permits Coordinator	25	25.00	13.75	38.75	16.15
4. Request review by IM	Permits Coordinator	5	25.00	13.75	38.75	3.23
a. Indirect Connection Plan Review	Senior Technical Assistant	10	36.00	19.80	55.80	9.30
ENGINEERING REVIEW						
6. Prepare fee memo deliver check to accounting	Permits Coordinator	10	25.00	13.75	38.75	6.46
ACCOUNTING PROCESSES CHECK						
a. Send Checks to Customer Service for deposit	Staff Accountant	10	36.00	19.80	55.80	9.30
b. When deposit is confirmed pick up checks	Staff Accountant	10	36.00	19.80	55.80	9.30
c. Process information in Oracle	Staff Accountant	10	36.00	19.80	55.80	9.30
ENGINEERING						
7. Prepare letters, forms, permit and labels	Permits Coordinator	25	25.00	13.75	38.75	16.15
8. Enter information into NBC-GIS program	Permits Coordinator	15	25.00	13.75	38.75	9.69
9. Scan file information	Permits Coordinator	15	25.00	13.75	38.75	9.69
10. Mail and/or call permittee	Permits Coordinator	5	25.00	13.75	38.75	3.23
11. Enter scanned information into sharepoint files	Permits Coordinator	15	25.00	13.75	38.75	9.69
Total: Indirect Sewer Connection Application Cost						\$ 130.00

Div. 1-42: Refer to the Harold Smith testimony at page 12, lines 17-28. Is the Hardship Fund anticipated to reduce NBC's uncollectible accounts expense? If not, explain fully why not. If so, identify the anticipated impact on uncollectibles if the Hardship Fund is authorized.

Response: NBC is withdrawing its request to establish a Hardship Fund.

Div. 1-43: Refer to the Harold Smith testimony at page 13, lines 10-11. Identify and provide the pages from the union contract showing the July 1, 2018 and July 1, 2019 step increases.

Response: See attachment 1-43 Union Contract Step Increases.

Prepared by: Diane Buerger

Div. 1-44: Refer to the Harold Smith testimony at page 13, lines 12-14.

- a. Identify and provide the documentation, including board minutes, for the July 1, 2018 non-union step increase.
- b. What amount of non-union pay increase was actually granted effective on July 1, 2018?
- c. Identify and provide the non-union total payroll and details of such non-union payroll by component (e.g., straight time, overtime, shift premium time, etc.) for each month: (1) January through June 2018 and (2) July through October 2018.
- d. Identify and provide the documentation, including board minutes and approved budgets, for the July 1, 2019 non-union step increase.

Response:

- a. Non-union employees do not receive a step increase.
- b. The average non-union merit increase was 2.50%.

c.

NBC NON-UNION PAYROLL DETAILS BY COMPONENT JANUARY - OCTOBER 2018

PAY TYPE	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER
REGULAR	\$ 758,212.71	\$ 754,473.05	\$ 751,142.74	\$ 752,928.32	\$ 748,314.99	\$1,139,851.70	\$ 759,138.37	\$ 760,589.64	\$ 759,461.56	\$ 769,741.38
SHIFT DIFFERENTIAL	1,314.00	1,494.00	1,452.75	1,431.00	1,330.50	1,932.00	1,427.20	1,309.08	1,315.20	1,331.20
OVERTIME	12,736.07	10,175.47	11,370.62	7,479.78	10,111.21	18,137.19	14,513.91	16,144.94	12,461.67	15,814.33
MAX PAYOUT							72,341.27	13,445.54		
ACCRUAL RETRO		2,156.41	1,080.98		53,666.16	2,443.01	47,264.53	65,773.11		43,028.65
						======				. ===
WELLNESS INCENTIVE	1,100.00	1,600.00	2,500.00	900.00	1,200.00	7,500.00	2,600.00	3,400.00	3,900.00	1,750.00
WELLNESS H.S.A.	600.00	600.00	400.00	700.00	100.00	2,600.00				

d. Non-union employees do not receive step increases.

Prepared by: Diane Buerger

Div. 1-45: Overtime. Refer to the Harold Smith testimony at page 13, lines 17-21. Identify the amount separately of (1) union and (2) non-union overtime hours and overtime pay (dollars) for each of these periods:

- a. the fiscal year ending June 30, 2018.
- b. the fiscal years ending June 30, 2017, 2016 and 2015.
- c. projected/budgeted for the fiscal year ending June 30, 2019.
- d. Projected/budgeted for the fiscal year ending June 30, 2020.

Response:

Narragansett Bay Commission Overtime Hours and Dollars FY 2015 - 2018

	2015	2016	2017	2018
	OT Hours OT Dollars			
Union	12,585 \$473,737	11,751 \$453,167	15,170 \$591,401	14,286 \$585,669
Non-Union	1,178 \$ 58,760	2,149 \$102,704	2,770 \$134,578	3,498 \$167,974

No projections or budgets have been prepared for 2020.

Div. 1-46: Retirement accounts. Refer to the Harold Smith testimony at page 13, lines 27-32, through page 14, lines 1-3. Identify and provide the documentation provided by the State of Rhode Island Budget Office for FY2018, FY2019 and FY2020.

Response: See attachment 1-46 State of RI Planning Values FY 2018-2020.

Div. 1-47: Biosolids. Provide the following information, concerning the number of tons and the cost of biosolids disposal for each of these periods:

- a. the fiscal year ending June 30, 2018.
- b. the fiscal years ending June 30, 2017, 2016 and 2015.
- c. projected/budgeted for the fiscal year ending June 30, 2019.
- d. projected/budgeted for the fiscal year ending June 30, 2020.

Response:

Biosolids	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2019 Budget
Field's Point Dry Tons	7,716	7,746	8,026	8,465	8,274
Bucklin Point Dry Tons	2,006	2,146	2,090	2,033	2,124
Total Dry Tons	9,722	9,892	10,116	10,498	10,398
Total Expense	\$ 4,177,385	\$ 4,303,071	\$ 4,443,909	\$ 4,731,063	\$ 4,808,259

Div. 1-48: Building and Grounds Maintenance.

- a. Does NBC have a contract for building and grounds maintenance? If not, explain fully why not. If so, identify and provide the current contract.
- b. Is any of the building and grounds maintenance performed for NBC by contractors? If so, identify and provide the amounts charged by each contractor by month for (1) the fiscal year ending June 30, 2018, (2) each month of actual cost after June 30, 2018, and (3) as budgeted for each month of the fiscal years ending June 30, 2019 and 2020.

Response:

- a. No, NBC does not have single contract for buildings and grounds maintenance. This account includes the expense associated with a large number of buildings and grounds maintenance activities including supplies and contracts with vendors for certain services such as janitorial services, hazardous waste removal, and trash removal.
- b. See attachments below and note that budget figures are not yet available for FY 2020.
 - 1-48 Account Analysis FY 2018 53470 Building and Ground Maintenance
 - 1-48 Account Analysis FY 2019 YTD 53470 Building and Ground Maintenance

Div. 1-49: Building Repairs, Structure and Equipment.

- a. Does NBC have a contract for building structures and equipment repairs? If not, explain fully why not. If so, identify and provide the current contracts.
- b. Is any of the building structure and equipment repairs performed for NBC by contractors? If so, identify and provide the amounts charged by each contractor by month for (1) the fiscal year ending June 30, 2018, (2) each month of actual cost after June 30, 2018, and (3) as budgeted for each month of the fiscal years ending June 30, 2019 and 2020.

Response:

- a. No, NBC dos not have a single contract for building structures and equipment repairs. The Repairs-Building-Structure-Equipment account includes the expense associated with the purchase of supplies and equipment used by NBC staff to repair NBC facilities and equipment.
- b. See attachments listed below and note that budget figures are not yet available for FY 2020:
 - 1-49 Account Analysis Report FY 2018 53610 Repairs-Bldg-Struct-Equip 1-49 Account Analysis Report FY 2019 YTD – 53610 Repairs-Bldg-Struct-Equip

Div. 1-50: Maintenance Contracts.

- a. Does NBC have a contract for maintenance related to the costs recorded in account 53630? If not, explain fully why not. If so, identify and provide the current contracts.
- b. Is any of the maintenance expense in account 53630 performed for NBC by contractors? If so, identify and provide the amounts charged by each contractor by month for (1) the fiscal year ending June 30, 2018, (2) each month of actual cost after June 30, 2018, and (3) as budgeted for each month of the fiscal years ending June 30, 2019 and 2020.

Response:

- a. NBC has multiple contracts related to maintenance in account 53630.
- b. NBC has multiple contracts related to maintenance and they are listed in Attachment 1-50 Maintenance Contracts FY2018 Actual, FY 2019 Budget and FY 2019 Updated. Please note that budget figures are not yet available for FY 2020.

Div. 1-51: Natural Gas Expense. Is NBC invoiced for natural gas expense? If not, explain fully why not. If so, identity the invoiced amounts and provide the invoices for (1) each month in the fiscal year ending June 30, 2018, and (2) each month of actual cost after June 30, 2018.

Response: Yes, NBC is invoiced for natural gas expense. See attachments for invoices.

1-51 Gas FY18 1-51 Gas FY19

Div. 1-52: Electricity expense. Is NBC invoiced for any of its electricity expense? If not, explain fully why not. If so, identity the invoiced amounts and provide the invoices for (1) each month in the fiscal year ending June 30, 2018, and (2) each month of actual cost after June 30, 2018.

Response: Yes, NBC is invoiced for electricity expense. See attachments for invoices.

1-52 Electricity FY 2018 1 of 3 1-52 Electricity FY 2018 2 of 3 1-52 Electricity FY 2018 3 of 3 1-52 Electricity FY 2019

1-52 Electricity FY 2019 Constellation

Div. 1-53: Chemicals expense. Is NBC invoiced for its hypochlorite chemical expense? If not, explain fully why not. If so, identity the invoiced amounts and provide the invoices for (1) each month in the fiscal year ending June 30, 2018, (2) each month of actual cost after June 30, 2018; and (3) each month in the three fiscal years ending June 30, 2017, 2016 and 2015.

Response: Yes, NBC is invoiced for hypochlorite expense. See attachments for invoices.

1-53 Hypochlorite FY 15 1-53 Hypochlorite FY 16 1-53 Hypochlorite FY 17 1-53 Hypochlorite FY 18 1-53 Hypochlorite FY 19

Div. 1-54: Chemicals expense. Is NBC invoiced for its bisfulfite chemical expense? If not, explain fully why not. If so, identity the invoiced amounts and provide the invoices for (1) each month in the fiscal year ending June 30, 2018, (2) each month of actual cost after June 30, 2018; and (3) each month in the three fiscal years ending June 30, 2017, 2016 and 2015.

Response: Yes, NBC is invoiced for bisulfite expense. See attachments for invoices.

1-54 Bisulfite FY15 1-54 Bisulfite FY16 1-54 Bisulfite FY17 1-54 Bisulfite FY18 1-54 Bisulfite FY19

Div. 1-55: UV Disinfection expense. Is NBC invoiced for its UV Disinfection expense? If not, explain fully why not. If so, identity the invoiced amounts and provide the invoices for (1) each month in the fiscal year ending June 30, 2018, (2) each month of actual cost after June 30, 2018; and (3) each month in the three fiscal years ending June 30, 2017, 2016 and 2015.

Response: Yes, NBC is invoiced for UV Disinfection expenses. See attachments for invoices and note that this account was created in FY 2017 so the information is not available for FY 2016 and FY 2015.

1-55 UV Disinfection FY171-55 UV Disinfection FY181-55 UV Disinfection FY19

Div. 1-56: RIPUC assessment. Identify and provide the most current RIPUC assessment to NBC.

Response: See attachment 1-56 PUC Assessment.

Div. 1-57: Meter downsizing. Refer to the Harold Smith testimony at pages 19-20.

- a. Does NBC maintain documentation of commercial and industrial customers who provide proof that downsizing an input meter is not feasible? If not, explain fully why not. If so, identify and provide illustrative copies of the documentation for this that is maintained by NBC.
- b. What costs are involved with downsizing a meter?
- c. During fiscal year 2018 did NBC conduct any meter downsizing installations for commercial or industrial customers? If not, explain fully why not. If so, how many were conducted and what was the total and average cost?

Response:

- a. No. Currently, the NBC's tariffs require that the NBC bill sewer use fees based on the size of the input meter. The NBC does not maintain documentation for commercial or industrial customers that can provide proof that downsizing a meter is not feasible, although NBC has received complaints from customers.
- b. NBC does not own, sell, or maintain water meters so the customer must work with the water board that provides them service to change their meter. The following tasks may be required to downsize a meter:
 - Preparation of site plans.
 - Purchase of a new meter.
 - Installation of a backflow prevention device.
 - Replacement of all lead services required on existing water lines.
 - Installation of service pipes from the curb stop to the premise.
 - Service pipes over 100 feet of length from the curb stop to the premise requires a "hot box" installation.
 - All plumbing work after the meter.
 - Traffic control.
 - Saw cutting of pavement in street.
 - Licensed plumber required to furnish information as to the number of plumbing fixtures at premise.
 - If property has private fire hydrants connected to their large meter, a separate service and meter must be installed.
- c. NBC did not conduct any meter downsizing installations for any commercial or industrial customers in fiscal year 2018 because the NBC does not own or install input water meters.

Div. 1-58: Refer to the testimony of Kathryn Kelly. How much cost is being requested by NBC in the current rate case for the Combined Sewer Overflow (CSO) program Phase III? Explain fully and show calculations.

Response: NBC is not requesting cost recovery for the CSO Program Phase III in this general rate filing.

Div. 1-59: Refer to the testimony of Kathryn Kelly. How much cost is being requested by NBC in the current rate case for the CSO Program Phases I and II? Explain fully and show calculations.

Response: NBC is not requesting cost recovery for the CSO Program Phase I and II in this general rate filing.

Div. 1-60: Refer to the testimony of Kerry Britt.

- a. How much cost is being requested by NBC in the current rate case for the Pretreatment Program? Explain fully and show calculations.
- b. What documentation has NBC maintained concerning the time and cost it takes to process new permits for each of the three tiers listed on page 3?
- c. What documentation has NBC maintained concerning the time and cost it takes to process renewal permits for each of the three tiers listed on page 3?
- d. Explain and include an illustrative sample of the documentation maintained by NBC for new and renewal permits, as described in the responses to parts b and c.
- e. How much revenue did NBC report in the test year ending June 30, 2018 for its current Wastewater Discharge Permit Application Fees?
- f. How much revenue does NBC anticipate in the rate year for each tier of its proposed three-tier structure of fees? Show amounts of estimated revenue for each tier level and explain in detail how they were estimated.

Response:

a. The NBC is requesting \$62,800. This amount represents the time and labor associated with issuing a permit. Please refer to the schedule provided below. Please refer to Schedule HJS-32 for detailed calculations.

Narragansett Bay Commission Calculation of Pretreatment Permitting Costs

	Tier I - Significant Industrial Use	ers						
Task	Person	Time (mins)	Hourly Rate	Overhead (@ 55%)	Total Hourly Rate	Total Cost	# of Users Permitted annualy	Rate Year Revenue
Mail Processing (includes logging and scanning)	Clerks	10	\$24.55	\$ 13.50	\$38.05	\$ 6.34		
Supervisor Mail Review and Processing	Manager, Assistant Manager, Principal PT	10	43.97	24.18	68.15	11.36		
Application Review	Engineer	15	24.40	13.42	37.82	9.46		
File/Plan Review	Engineer	180	24.40	13.42	37.82	113.46		
Meeting and or Inspection	Engineer	120	24.40	13.42	37.82	75.64		
Permit Writing	Engineer	90	24.40	13.42	37.82	56.73		
Supervisor Initial Review	Assistant Manager or Principal PT Engineer	45	39.46	21.70	61.16	45.87		
Typing (including corrections)	Clerk	120	24.55	13.50	38.05	76.11		
Proof Reading	Engineer	45	24.40	13.42	37.82	28.37		
Supervisor Final Review	Assistant Manager or Principal PT Engineer	27	39.46	21.70	61.16	27.52		
Manager Review	Manager	30	53.00	29.15	82.15	41.08		
Permit Processing (typing supporting documents, copying)	Clerks	30	24.55	13.50	38.05	19.03		
Signing & Tracking	Manager	10	53.00	29.15	82.15	13.69		
Total						\$ 500	14	\$ 7,000

DOCKET NO. 4890
Response from Narragansett Bay Commission
to the Division of Public Utilities and Carriers
Data Requests
Set 1
November 5, 2018

	Tier II - Non-Significant Industrial	Users						
Task	Person	Time (mins)	Hourly Rate	Overhead (@ 55%)	Total Hourly Rate	Total Cost	# of Users Permitted annualy	Rate Year Revenue
Mail Processing (includes logging and scanning)	Clerks	10	\$24.55	\$ 13.50	\$38.05	\$ 6.34		
Supervisor Mail Review and Processing	Manager, Assistant Manager, Principal PT	10	43.97	24.18	68.15	11.36		
Application Review	Engineer or Tech	30	24.76	13.62	38.38	19.19		
File/Plan Review	Engineer or Tech	60	24.76	13.62	38.38	38.38		
Meeting and or Inspection	Engineer or Tech	60	24.76	13.62	38.38	38.38		
Permit Writing	Engineer or Tech	45	24.76	13.62	38.38	28.78		
Supervisor Initial Review	Assistant Manager or Principal PT Engineer	30	39.46	21.70	61.16	30.58		
Typing (including corrections)	Clerk	60	24.55	13.50	38.05	38.05		
Proof Reading	Engineer or Tech	45	24.76	13.62	38.38	28.78		
Supervisor Final Review	Assistant Manager or Principal PT Engineer	20	39.46	21.70	61.16	20.39		
Manager Review	Manager	10	53.00	29.15	82.15	13.69		
Permit Processing (typing supporting documents, copying)	Clerks	20	24.55	13.50	38.05	12.68		
Signing & Tracking	Manager	10	53.00	29.15	82.15	13.69		
Total						\$ 300	46	\$13,800

	Tier III - Commercial Users							
Task	Person	Time (mins)	Hourly Rate	Overhead (@ 55%)	Total Hourly Rate	Total Cost	# of Users Permitted annualy	Rate Year Revenue
Mail Processing (includes logging and scanning)	Clerks	10	\$24.55	\$ 13.50	\$38.05	\$ 6.34		
Supervisor Mail Review and Processing	Manager, Assistant Manager, Principal PT	10	43.97	24.18	68.15	11.36		
Application Review	Tech	15	24.94	13.72	38.66	9.66		
File/Plan Review	Tech	10	24.94	13.72	38.66	6.44		
Meeting and or Inspection	Tech	30	24.94	13.72	38.66	19.33		
Permit Writing	Tech	10	24.94	13.72	38.66	6.44		
Supervisor Initial Review	Assistant Manager or Principal PT Engineer	10	39.46	21.70	61.16	10.19		
Typing (including corrections)	Clerk	30	24.55	13.50	38.05	19.03		
Proof Reading	Engineer or Tech	10	24.76	13.62	38.38	6.40		
Supervisor Final Review	Assistant Manager or Principal PT Engineer	10	39.46	21.70	61.16	10.19		
Manager Review	Manager	5	53.00	29.15	82.15	6.85		
Permit Processing (typing supporting documents, copying)	Clerks	20	24.55	13.50	38.05	12.68		
Signing & Tracking	Manager	10	53.00	29.15	82.15	13.69		
Total						\$ 140	300	\$42,000

- Total Annual Pretreatment Permit Fees \$62,800
- b. NBC currently does not maintain written documentation regarding the time needed to process and issue new permits. The Pretreatment Manager has 26 years of experience in writing, reviewing and processing Pretreatment Permits for companies. The time estimates provided are based on this experience.
- c. NBC currently does not maintain written documentation regarding the time needed to process and issue permit renewal. However, the Pretreatment Manager has 26 years of experience in writing, reviewing and processing Pretreatment Permits for renewing Pretreatment Permits. The time estimates provided are based on this experience.
- d. As mentioned in response 1-60 (B) & (C) NBC currently does not maintain written documentation regarding the time needed to process and issue permit renewal. Please see Calculation of Pretreatment Permitting Costs schedule referenced in response 1-60 (A).

- e. The NBC does not have a tariff or fee for a Wastewater Discharge Permit Application.
- f. The NBC will generate \$7,000 for Tier I, \$13,800 for Tier II, and \$42,000 for Tier III. Please refer to the Schedule provided in response to Div. 1-60(a.) above for detailed calculations. Please refer to Schedule HJS-32 for detailed calculations.

Prepared by: Kerry Britt

CERTIFICATION

I hereby certify that on November 26, 2018, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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