

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Liberty Utilities (Missouri)
Water) LLC’s Application for a Certificate)
Of Convenience and Necessity Authorizing)
it to Construct, Install, Own, Operate,)
Maintain, Control, and Manage a Sewer)
System in Cape Girardeau County, Missouri)

File No. SA-2020-0067

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its *Staff Recommendation*, respectfully states as follows:

1. On November 25, 2019, Liberty Utilities (Missouri Water) LLC (“Liberty”), filed an *Application* with the Missouri Public Service Commission (“Commission”) requesting a Certificate of Convenience and Necessity (“CCN”) to install, own, acquire, construct, operate, control, manage, and maintain a sewer system in a service area that includes the Savers Farm subdivision in Cape Girardeau County, Missouri, as an addition to Liberty’s existing service territories. On January 23, 2020, Staff was ordered to file a recommendation regarding Liberty’s request no later than March 2, 2020.

2. Pursuant to Section 393.170, RSMo, no water or sewer corporation shall provide service to consumers without first having obtained approval from the Commission.

3. The Commission typically applies the five Tartan Criteria established in *In the Matter of Tartan Energy Company, et al.*, 3 Mo. PSC 3d 173, 177 (1994) when deciding whether or not to grant a new CCN. The criteria are: (1) there must be a need for the service; (2) the applicant must be qualified to provide the service; (3) the applicant

must have the financial ability to provide service; (4) the applicant's proposal must be economically feasible; and (5) the service must promote the public interest. In addition to the Tartan Criteria, when considering an application involving existing water and/or sewer systems, the Commission analyzes the Technical, Managerial, and Financial capabilities ("TMF") of the applicant.

4. As explained in Staff's Memorandum, attached hereto as Appendix A, Staff conducted an investigation into Liberty's request. Based upon its review, Staff concludes that Liberty fulfills the requirements regarding TMF capacities and the Tartan Criteria.

5. As further explained in Staff's Memorandum, the Savers Farm sewer system currently serves approximately 110 residential customers. Members were given notification of a proposed transfer of the system to Liberty at an annual homeowners association meeting on December 19, 2019. Liberty states that the homeowners were very receptive to the proposal.

6. Liberty proposes the existing rates, rules, and regulations currently applicable to certain named service areas found in MO PSC No. 15 Sheet No. 4.1 be applied to Savers Farm. The monthly flat rate for a single family residence would be \$46.21.

7. Accordingly, Staff recommends approval granting the CCN, with conditions described in Staff's Memorandum, as the requested CCN would be necessary and convenient for the public service and is not detrimental to the public interest.

WHEREFORE, Staff respectfully submits this *Staff Recommendation* for the Commission's information and consideration and hereby requests the Commission grant Liberty Utilities (Missouri Water) LLC a Certificate of Convenience and Necessity, with

conditions, to provide sewer service to a service area that includes the Savers Farm subdivision in Cape Girardeau County, MO.

Respectfully submitted,

/s/ Travis J. Pringle

Travis J. Pringle

Legal Counsel

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 2nd day of March 2020.

/s/ Travis J. Pringle

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. SA-2020-0067

FROM: Jarrod Robertson – Water and Sewer Department
Keith Foster – Auditing Department
Courtney Barron – Auditing Department
Gary Bangert – Customer Experience Department
Ben Rankin – Customer Experience Department
Andrew Harris – Water and Sewer Department
Daronn A. Williams – Water and Sewer Department

<u>/s/ Jarrod Robertson</u>	<u>03/2/20</u>	<u>/s/ Travis Pringle</u>	<u>03/2/20</u>
Case Manager	Date	Staff Counsel	Date

SUBJECT: Staff’s Recommendation to Approve Certificate of Convenience and Necessity

DATE: March 2, 2020

EXECUTIVE SUMMARY

Staff’s position, based on its review as described herein, is that the proposal for a new CCN to provide sewer service, and applying existing Liberty rates, would be necessary and convenient for the public service and not detrimental to the public interest. Staff therefore recommends approval with the conditions and actions as outlined herein.

CASE BACKGROUND

On November 25, 2019, Liberty Utilities (Missouri Water) LLC (Liberty) filed an *Application and Motion for Waiver* (Application) with the Missouri Public Service Commission (Commission). Liberty seeks a Certificate of Convenience and Necessity (CCN) to provide sewer service in an area that includes the Savers Farm subdivision in Cape Girardeau County near Jackson, Missouri. In the Application, Liberty states that it intends to acquire sewer utility assets that are at present owned and operated by the system’s developer, Cape Land & Development, LLC (Cape Land).

On December 2, 2019, the Commission issued its *Order Directing Notice, Setting Intervention Deadline, and Directing Staff Filing*, in which it directed interested parties to intervene in this case by January 2, 2020, and also directed Staff to file a status report or recommendation no later than January 17, 2020. Due to outstanding data requests and ongoing discussions with Liberty, Staff requested an extension to file its recommendation no later than March 2, 2020, which the Commission granted. No parties have sought to intervene in this case.

BACKGROUND OF LIBERTY AND THE SEWER SYSTEM

Liberty is an existing regulated water and sewer utility and a Missouri limited liability company with its principle office located at 602 Joplin Street, Joplin, Missouri, 64801. Liberty is currently providing water and sewer services to approximately 3,000 customers throughout its Missouri service areas.

Savers Farm (a new development with five phases to be completed by the end of 2020) is currently served by an unregulated sewer system owned and operated by Cape Land, a Missouri limited

liability company in good standing. Phases 1 through 3 are completed and Phase 4 is currently under construction. Cape Land operates a recirculating sand filter system providing sewer service to approximately 110 residential customers in the subdivision. Construction of the Wastewater Treatment Facility (WWTF) began in 2016 and was completed in 2017. The WWTF is comprised of a parallel tank system with a 50,000 gallon septic tank and a 25,000 gallon recirculating tank in each of the parallel paths, followed by four sand filter beds and ultraviolet light disinfection. Two of the four sand filter beds are currently in use to treat the current flow from the approximately 110 completed homes. The sewer collection system consists of approximately 11,000 feet of 8” gravity sewers flowing to three lift stations, and approximately 2,800 feet of 4” force main conveying from the lift stations to the central septic tanks at the WWTF.

STAFF’S INVESTIGATION

Rate Base

The Auditing Department conducted a review of plant-related records provided by Liberty for the Savers Farm sewer system. Included as Exhibit A to Liberty’s Application is a confidential fully executed Asset Purchase Agreement (APA), including an agreed-to purchase price for the assets comprising the Savers Farm sewer system. The APA also contains a schedule of “distribution facilities” containing three exhibits that appear to be descriptions of the assets making up the sewer system. However, only quantities of items for each phase are identified without any associated costs. The Auditing Department requires this information to calculate a rate base with which it uses to determine the reasonableness of the purchase price.

Staff submitted several Data Requests (DRs) to Liberty to solicit more detailed information about the costs for the plant. In its response to DR 0002, Liberty noted it had been provided invoices for installation costs, presumably from the developer. Copies of these invoices were requested and provided in response to DR 0002.1. There did not appear to be a correlation between these invoices and the schedule of “distribution facilities” with the APA. Liberty responded to DR 0003 that it had reviewed the installation invoices and determined the Net Book Value (NBV) of the sewer system, which it used to determine a purchase price. Upon review of the detailed calculation of the NBV provided in a follow-up response to DR 0003.1, Staff determined Liberty had simply listed all the items in the aforementioned invoices and summed them to represent a total plant value. There was no attempt to assign each invoiced item to a Uniform System of Accounts (USOA) account to properly categorize the WWTF plant values for which there are different depreciation rates to apply. In DR 0011, Staff requested a plant-in-service valuation, by USOA account, of the Savers Farm sewer system including the current depreciation reserve and depreciation rates used with supporting workpapers and invoices. Liberty referred to its response to DR 0007, which included two confidential electric invoices, and a confidential Disclosure Schedule to the APA, neither of which contained the information requested by DR 0011. Rather than attempting to provide the information requested, Liberty instead included the following statement in its response: “USOA accounting and practices concerning depreciation reserves are not used as the system is currently unregulated.” Given Liberty’s response, the Auditing and Water & Sewer Departments reviewed each of the invoices provided in response to DR 0002.1 against the list provided with the NBV file in response to DR 0003.1. Based on the descriptions provided on the invoices, Staff assigned USOA account numbers to plant items that, in Staff’s best judgement, appear to be associated with a WWTF. Staff identified invoiced items included in Liberty’s NBV analysis that are actually associated with drinking water and storm water systems, not WWTFs. Staff excluded

these amounts as well as any others that could not be confirmed to be related to the Savers Farm sewer system. The total amount excluded from Liberty's plant totals is \$141,807. Staff applied the depreciation rates to the applicable accounts that were ordered in Liberty's last rate case for Cape Rock Village (Case No. WR-2018-0170), with the exception of USOA accounts 352.1 and 362. For these accounts, the Water & Sewer Department provided appropriate rates to be used.

Attachment D shows information for the Savers Farm sewer system, projected plant-in-service and depreciation reserve balances as of December 31, 2019, with an estimated rate base of \$617,848.

Based on Staff's review of the Savers Farm information in this proceeding, the purchase price being paid by Liberty may be below the NBV of the Savers Farm assets. Staff's estimated rate base is presented for information purposes only. A Commission decision regarding rate base level in this case is not necessary, and Staff is not recommending any change to the rates charged by Liberty in the applicable existing tariff to be applied to Savers Farm. If the Commission approves this CCN and Liberty acquires the Savers Farm sewer system, then Staff expects an updated rate base level for this system will be established when Liberty files its next rate case. It has been Staff's position in prior cases that the rate base, and ultimately the utility rates charged for acquired properties should be based upon the original NBV of such properties when first devoted to public use; rate base should not reflect the amount of any acquisition adjustment, either above or below, that NBV value. Liberty has not requested such an adjustment in this matter.

By Commission regulations, Liberty should keep its financial records for utility plant-in-service and operating expenses in accordance with the National Association of Regulatory Utility Commission (NARUC) USOA. Staff recommends the Commission specifically require such recordkeeping apply to the Savers Farm sewer system.

Plant Capacity Adjustment

Since the Savers Farm wastewater system appears to have been designed and constructed to serve approximately twice the number of residential customers being served at present, Staff may consider proposing, in future rate proceedings, a capacity adjustment to certain wastewater system components. Such a capacity adjustment, if applied, would reduce the plant balance level and depreciation expense to be included in rate calculations.

Service Area

In its Application, Liberty is requesting an approved service area that is defined by the boundary of the Savers Farm subdivision. Upon review of the application, Staff requested and received a revised service area map that is in color, shows local streets and highways, displays a clear and defined outlined tract that represents the proposed service area, with words and details large enough to easily read, and without extraneous surveying notes and details. The revised map can be used to easily identify if a resident is in or out of the service area. Staff also requested and received a revised legal description that was not in all capital letters to use in this memorandum and subsequent documents.

The service area map is shown in Attachment A, and the written legal description is shown in Attachment B. Staff recommends that this proposed service area and legal description be approved, and depicted in Liberty's tariff, as further discussed herein.

Tariff and Rate Matters

A map and a description of the proposed Savers Farm service area, reflecting the attachments to this memorandum, will need to be included as new tariff sheets in Liberty's sewer tariff MO PSC No. 15.

Liberty has proposed that its approved rates on MO PSC No. 15 Sheet No. 4.1, applicable to certain named service areas, be applied to Savers Farm. The monthly flat rate is \$46.21 for a single family residence. Staff recommends that Liberty submit a revised tariff Sheet No. 4.1 that is identical to the existing Sheet No. 4.1, except adding Savers Farm as a named applicable service area.

Currently, there is no specific charge for sewer service. Therefore, Staff is not able to express a specific rate impact upon the existing Savers Farm customers if this CCN is approved.

The table of contents in Liberty's tariff will also need to be updated to reflect the addition of the new sheets containing the map, description, and revision of the rate sheet.

The revised tariff sheets, to reflect the addition of Savers Farm as a named service area, will be:

- Cover - Sheet No. Title Page
- Index - Sheet No. 1
- Rates - Sheet No. 4.1

The new original tariff sheets, reflecting the map and description, will be:

- Sheet No. 2.4
- Sheet No. 3.4

Staff recommends that after approval but before Liberty closes on the utility assets, Liberty submit the new or revised sewer tariff sheets such that they may become effective on or before the date Liberty closes on the Savers Farm assets.

Technical, Managerial, and Financial Capacity, and Tartan Energy Criteria

Staff utilizes the concepts of Technical, Managerial, and Financial criteria (TMF) in studying applications involving existing water and/or sewer systems. Staff has reviewed and stated its position regarding Liberty's TMF capacities in previous CCN and transfer of assets cases. Liberty has demonstrated over many years that it has adequate resources to operate utility systems that it owns, to acquire new systems, to undertake construction of new systems and expansions of existing systems, to plan and undertake scheduled capital improvements, and timely respond and resolve emergency issues when such situations arise. After completing its review in this matter, Staff continues to find that Liberty holds the requisite TMF criteria.

It is also customary with most cases involving a new CCN for Staff to utilize the Tartan Criteria when analyzing requests for a new CCN. The Tartan criteria contemplate: 1) need for service; 2) the utility's qualifications; 3) the utility's financial ability; 4) the feasibility of the proposal; and 5) promotion of the public interest. Similar to the TMF capacities, in previous CCN and CCN transfer cases Staff investigated these criteria and that investigation relates to this proposed acquisition. Based on Staff's investigation, it is Staff's opinion there is 1) a need for service since the customers are already receiving service and it is anticipated that more homes will be built and

will require service; 2) Liberty is a qualified utility; 3) Liberty has demonstrated its financial ability; 4) the proposed rates are feasible; and 5) due to the positive nature of the preceding criteria, this proposed acquisition promotes the public interest. .

Staff's conclusion is that the points regarding TMF criteria and the Tartan Energy criteria are all met.

Depreciation

In Case No.WR-2018-0170, the Commission ordered water and sewer depreciation rates applicable to systems owned by Liberty. Staff recommends the use of sewer depreciation rates similar to those ordered and applied to Cape Rock Village for all plant in the Savers Farm service area. These depreciation rates are shown in Attachment C.

Publicity and Customer Notice

According to information given to Staff by Liberty, the homeowner's association (Association) communicates with its homeowner members primarily through regular meetings. Staff was provided with a copy of the agenda from the Association's annual meeting on December 19, 2019, when members were notified of the proposed transfer of the sewer system to a public entity. Liberty states that the homeowners were reportedly very receptive to their proposed purchase. Since the sewer customers are members of and have control over the Association's actions, including that related to the sewer system, Staff asserts that customers are inherently informed of this proposed transfer of assets, and as such no traditional "public" communication is necessary. As of the date of this report, no public comments have been filed in the Commission's Electronic Filing Information System (EFIS).

Customer Service and Billing

Liberty maintains a business office in Jackson, Missouri, that is less than three miles from the Savers Farm subdivision. Customers will be able to visit the office location from 8:00am to 4:00pm, Monday through Friday, for billing and customer service inquiries. The Company utilizes a nationwide call center through its affiliates, which will be available for customers to contact toll-free to report issues during non-business hours.

Savers Farm homeowners currently pay no fees for the sewer service provided by the subdivision developer. If Liberty acquires the system, homeowners will begin receiving monthly flat-rate invoices for the sewer service. Liberty currently serves the Savers Farm subdivision with natural gas service. Most of the homeowners are currently Liberty gas customers, and they will begin receiving combined bills for gas and sewer service. A line item charge of \$46.21 will be added to the monthly bill Savers Farm customers currently receive from Liberty.

In order to incorporate the Savers Farm customers into its billing and customer service systems, it will be necessary for Liberty to properly enter the appropriate customer information into its systems and apply the appropriate Commission-approved rate. Liberty will also need to provide training to its call center personnel regarding rates and rules applicable to the Savers Farm customers so that customer service matters are handled accurately and in a timely manner.

OTHER ISSUES

Savers Farm, as an unregulated sewer operation, has no obligations due to the Commission, and has no pending actions before the Commission.

Liberty is a corporation that is in “good standing” with the Missouri Secretary of State.

Liberty is current with annual report filings with the Commission through calendar year 2018, as documented on EFIS.

Liberty is current on its annual assessment quarterly payments through the second quarter of fiscal year 2019.

Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

STAFF’S RECOMMENDATIONS AND CONCLUSIONS

Staff’s position, based on its review as described herein, is that the proposal for a new CCN to provide sewer service, and applying existing Liberty rates, would be necessary and convenient for the public service and not detrimental to the public interest. Staff therefore recommends approval with the conditions and actions as outlined herein.

STAFF’S RECOMMENDATIONS

Based upon the above, Staff recommends that the Commission:

1. Grant Liberty a CCN to provide sewer service in the proposed Savers Farm service area, as modified and outlined herein;
2. Approve Liberty’s monthly residential flat rate of \$46.21 to apply to Savers Farm;
3. Require Liberty to submit new and revised tariff sheets, to become effective before closing on the assets, that include:
 - a. Cover (Sheet No. Title Page)
 - b. Index (Sheet No. 1)
 - c. Sewer rates (Sheet No. 4.1)
 - d. Service area map (Sheet No. 2.4)
 - e. Service area written description (Sheet No. 3.4)

as applicable to sewer service in its Savers Farm service area, to be included in its EFIS sewer tariff P.S.C. MO No. 15;

4. Require Liberty to notify the Commission of closing on the assets within five (5) days after such closing;
5. If closing on the sewer system assets does not take place within thirty (30) days following the effective date of the Commission’s order approving such, require Liberty to submit a status report within five (5) days after this thirty (30) day period regarding the status of closing, and additional status reports within five (5) days after each additional thirty (30) day period, until closing takes place, or until Liberty determines that the transfer of the assets will not occur;
6. If Liberty determines that a transfer of the assets will not occur, require Liberty to notify the Commission of such no later than the date of the next status report, as addressed above, after such determination is made, and require Liberty to submit tariff sheets as appropriate and necessary that would cancel service area maps, descriptions, rates and rules applicable to the Savers Farm service area in its sewer tariff;

7. Require Liberty to keep its financial books and records for plant-in-service and operating expenses as related to the Savers Farm operations in accordance with the NARUC Uniform System of Accounts;
8. Require Liberty to provide detailed plant records that includes for each plant asset a detailed description and original plant costs with supporting detailed invoices and identified by USOA account numbers in its next rate case for Savers Farm Sewer System;
9. Adopt for the Savers Farm sewer assets the depreciation rates ordered for Cape Rock Village in Liberty's last rate case, Case No. WR-2018-0170;
10. Require Liberty to obtain from Cape Land, prior to or at closing, all available plant-in-service related records and documents, including but not limited to all plant-in-service original cost documentation, along with depreciation reserve balances, documentation of contribution-in-aid-of construction transactions, and any capital recovery transactions;
11. Make no finding that would preclude the Commission from considering the ratemaking treatment to be afforded any matters pertaining to the granting of the CCN to Liberty, including expenditures related to the certificated service area, in any later proceeding;
12. Require Liberty to provide training to its call center personnel regarding rates and rules applicable to the Savers Farm customers;
13. Require Liberty to include the Savers Farm customers in its established monthly reporting to the CXD Staff on customer service and billing issues, on an ongoing basis, after closing on the assets;
14. Require Liberty to distribute to the Savers Farm customers an informational brochure detailing the rights and responsibilities of the utility and its customers regarding its sewer service, consistent with the requirements of Commission Rule 20 CSR 4240-13, within thirty (30) days of closing on the assets;
15. Require Liberty to provide to the CXD Staff an example of its actual communication with the Savers Farm customers regarding its acquisition and operations of the sewer system assets, and how customers may reach Liberty, within ten (10) days after closing on the assets;
16. Require Liberty to provide to the CXD Staff a sample of ten (10) billing statements from the first month's billing within thirty (30) days after closing on the assets; and,
17. Require Liberty to file notice in this case outlining completion of the above-recommended training, customer communications, and notifications within ten (10) days after such communications and notifications.

Staff will submit a further recommendation regarding tariff sheets after filing by Liberty in this matter.

Attachments:

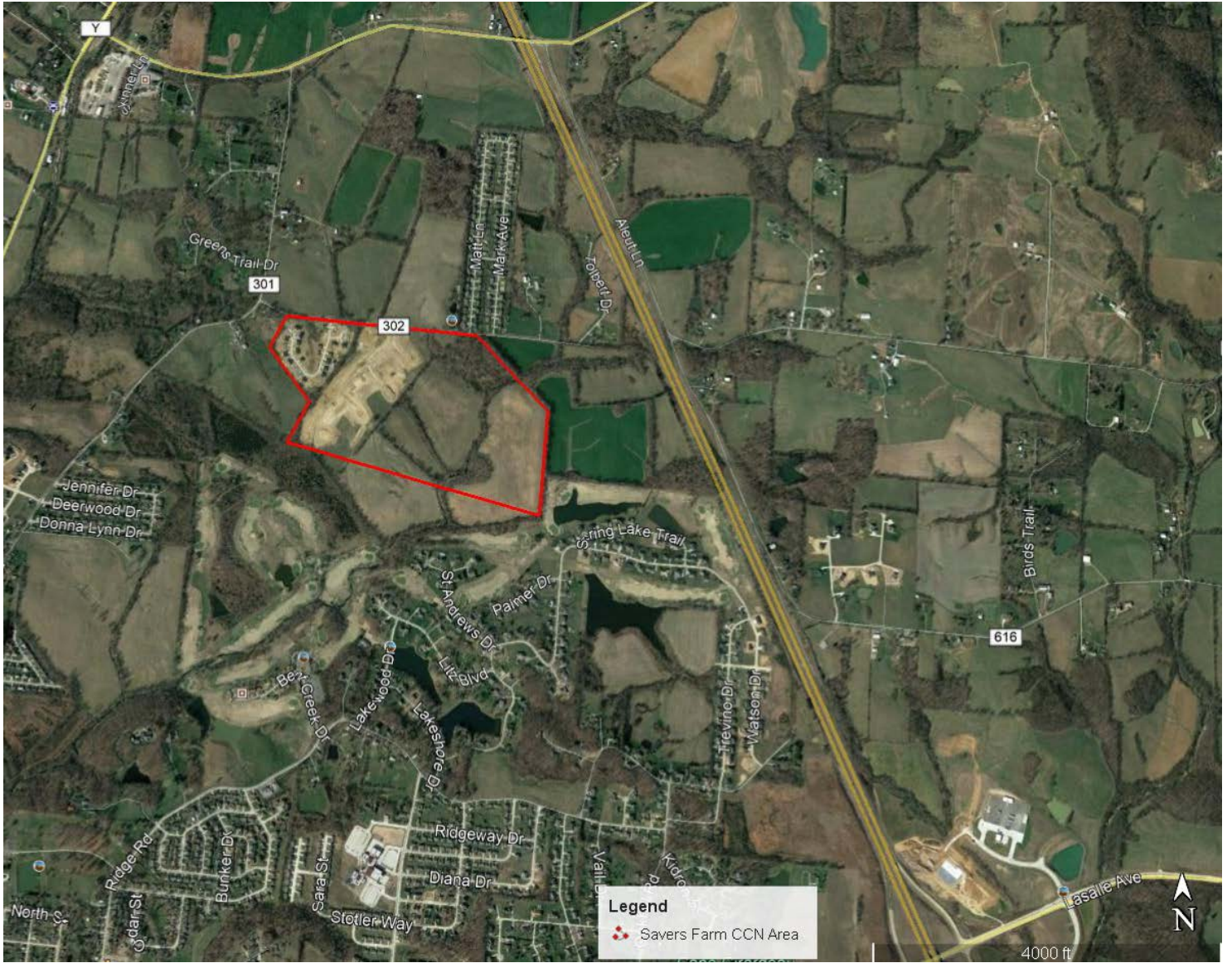
A: Proposed Sewer Service Area Map

B: Proposed Sewer Service Area Description

C: Depreciation Rates

D: Staff's Determination of Plant-in-Service, Depreciation Reserve, and Rate Base

Map of Service Area Savers Farm



Legal Description of Service Area

Part of U.S.P.S No. 318, Township 31 and 32 North, Range 13 East of the Fifth Principal Meridian, Cape Girardeau County, Missouri, more particularly described as follows:

Commence at the Northwest Corner of U.S.P.S No. 318; thence along said North line, South 83 degrees 50 minutes 03 seconds East 844.62 feet to the point of beginning; thence continue South 83 degrees 50 minutes 03 seconds East 2304.24 feet; thence leaving said North line, South 42 degrees 23 minutes 39 seconds East 1355.59 feet; thence South 05 degrees 50 minutes 52 seconds West 809.16 feet; thence North 82 degrees 29 minutes 37 seconds West 925.32 feet; thence North 82 degrees 37 minutes 10 seconds West 656.13 feet; thence North 47 degrees 26 minutes 00 seconds West 622.91 feet; thence South 39 degrees 32 minutes 53 seconds West 435.85 feet; thence North 83 degrees 09 minutes 20 seconds West 520.62 feet; thence North 74 degrees 21 minutes 16 seconds West 133.23 feet; thence North 76 degrees 07 minutes 16 seconds West 130.80 feet; thence North 26 degrees 04 minutes 33 seconds East 597.75 feet; thence North 39 degrees 50 minutes 28 seconds West 495.35 feet; thence North 30 degrees 30 minutes 19 seconds West 332.56 feet; thence North 31 degrees 19 minutes 52 seconds East 276.00 feet; thence North 09 degrees 56 minutes 03 seconds East 197.20 feet to the point of beginning.

The herein described tract contains 108.36 acres. Subject to all easements, restrictions, and reservations affecting any either written or implied.

LIBERTY UTILITIES (MISSOURI WATER)

Savers Farm

SCHEDULE of DEPRECIATION RATES*

SEWER

SA-2020-0067

<u>ACCOUNT NUMBER</u>	<u>ACCOUNT DESCRIPTION</u>	<u>DEPRECIATION RATE</u>
COLLECTION PLANT		
351	Structure & Improvements	2.5%
352.1	Collection Sewers (Force)	2.0%
352.2	Collection Sewers (Gravity)	2.0%
353	Services (A & B)	2.0%
354	Flow Measurement Devices	3.3%
PUMPING PLANT		
361	Structures and Improvements	4.0%
362	Receiving Wells	4.0%
363	Electric Pumping Equipment	10.0%
TREATMENT & DISPOSAL PLANT		
371	Structures and Improvements	3.7%
372	Treatment & Disposal Facilities	5.0%
372.1	Oxidation Lagoons	4.0%
373	Plant Sewers	5.0%
374	Outfall Sewer Lines	2.0%
GENERAL PLANT		
390	Structures and Improvements	2.5%
391	Office Furniture & Equipment	5.0%
391.1	Office Electronic & Computer Equip.	14.3%
392	Transportation Equipment	13.0%
393	Stores Equipment	4.0%
394	Tools, Shop, and Garage Equipment	5.0%
395	Laboratory Equipment	5.0%
396	Power Operated Equipment	6.7%
397	Communication Equipment	6.7%
399	Other Tangible Plant	5.0%
SHARED SERVICES PLANT**		
374	Land and Land Rights - Corporate	0.0%
390	Structures and Improvements - Corporate	2.5%
391	Office Furniture and Equipment - Corporate	5.0%
392.1	Transportation Equipment less than 12,000 lbs - Corporate	9.4%
394	Tools, Shop, and Garage Equipment - Corporate	5.0%
398	Miscellaneous Equipment - Corporate	5.0%
399	Other Tangible Property - Corporate	14.3%

399.1	Other Tangible Property - Servers - H/W - Corporate	20.0%
399.3	Other Tangible Property - Network - H/W - Corporate	14.3%
399.4	Other Tangible Property - PC Hardware - Corporate	20.0%
399.5	Other Tangible Property - Software - Corporate	14.3%

* Depreciation rates adopted from Liberty's last rate case, WR-2018-0170

**Depreciation Rates for Shared Services Plant will conform to ordered rates for Shared Services Accounts in GR-2018-0013. If the ordered rates for Shared Services Plant in GR-2018-0013 differ from the Shared Services Rates shown on this schedule, then the rates from GR-2018-0013 have precedent.

Liberty Utilities / Savers Farm
Case No. SA-2020-0067
Asset Valuation
Ending Balance as of December 31, 2019

Plant in Service	\$688,941
Depreciation Reserve	<u>\$71,093</u>
Net Plant in Service	<u><u>\$617,848</u></u>

Attachment D

