Exhibit No.:

Issue: Depreciation
Witness: Arthur W. Rice
ing Party: MoPSC Staff

Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: WR-2013-0461

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MISSOURI PUBLIC SERVICE COMMISSION REGULATORY REVIEW DIVISION UTILITY SERVICES

REBUTTAL TESTIMONY

OF

ARTHUR W. RICE, PE

LAKE REGION WATER & SEWER COMPANY

CASE NO. WR-2013-0461

Jefferson City, Missouri January 2014

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1		REBUTTAL TESTIMONY	
2		\mathbf{OF}	
3		ARTHUR W. RICE, PE	
4		LAKE REGION WATER & SEWER COMPANY	
5		CASE NO. WR-2013-0461	
6	Q.	Please state your name and business address.	
7	A.	My name is Arthur W. Rice, and my business address is Missouri Public Service	
8	Commission	n, P.O. Box 360, Jefferson City, MO 65102.	
9	Q.	What is your position with the Staff ("Staff") of the Missouri Public Service	
10	Commission	a ("Commission")?	
11	A.	I am a Utility Regulatory Engineer I in the Engineering and Management Services	
12	Unit of the Utility Services Department of the Regulatory Review Division.		
13	Q.	Would you please describe your educational background and other qualifications?	
14	A.	A copy of my work and educational experience was provided in Appendix 1,	
15	page 24 of the Staff's Report in this case.		
16	Q.	Have you previously testified before the Commission?	
17	A.	Yes. The cases in which I have filed testimony before the Commission are listed	
18	in Appendix 1, pages 25 and 26 of the Staff's report in this case.		
19	Q.	With reference to Case No. SR-2013-0459 and WR-2013-0461, have you	
20	participated	in Staff's audit of Lake Region Water & Sewer Company ("Company" or	
21	"Lake Regio	on") concerning its request for a rate increase in this proceeding?	
22	A.	Yes.	

EXECUTIVE SUMMARY

- Q. What is the purpose of this testimony?
- A. The purpose of my testimony is to provide the findings of further investigation on two items noted in the depreciation section of the Staff Report filed November 15, 2013 as requiring further investigation.
 - Q. What two items required further investigation?
- A. One is the 2012 retirement of the Shawnee Bend waste water treatment lagoon discussed on pages 32 and 33 of the Staff Report. The other is the recording of developer contributions in aid of construction (CIAC) associated with the \$38,535 of plant in the Horseshoe Bend sewer plant accounts that is actually installed in the Shawnee Bend sewer system.

SHAWNEE BEND LAGOON RETIREMENT

- Q. What is the issue related to the Shawnee Bend waste water treatment lagoon retirement?
- A. Staff's further investigation concludes that the cost of land placed in utility service in 1998 for the Shawnee Bend waste water treatment lagoon was included in plant in service as depreciable plant. The Company's 1998 annual report shows an addition of land recorded as a non-depreciable asset in Account 370.1, Oxidation Lagoon Land and Land Rights, at an amount of \$135,756. But, Lake Region's General Ledger and asset records show this \$135,756 was entered as a "Deposit Account Opening Balance" journal entry on January 1, 1999 in depreciable Account 372, Treatment and Disposal Equipment. Staff's concludes that the \$135,756 is the total original cost of both the land and the treatment plant equipment, and starting January 1, 1999 the original cost of the land was included by Lake Region as depreciable plant.

- Q. Do the Staff work papers and accounting schedules for Shawnee Bend sewer, in prior rate case, Case No. SR-2010-0110, show this \$135,756 treated as depreciable plant in Account 372 and include accumulated depreciation for the total \$135,756 starting in 1999?
 - A. Yes.
 - Q. Did Staff determine the original cost of the land?
- A. Yes. First, as an engineer familiar with construction cost for a similar waste treatment system built in 1997, I estimated a cost for the installation of the Lake Region equipment at \$35,000. Thus the rest of the \$135,756, or approximately \$100,000, is a reasonable estimate for the land cost. An entry relevant to this issue was found in a Lake Region consultant accountant's work paper related to the retirement of the lagoon system in 2012. Within a journal entry support paper, labeled MBC-13 for the lagoon system retirement, a line item was found showing the original cost of the lagoon site land at \$101,799. Thus Staff concluded that the original cost of the land is \$101,799.
- Q. What adjustments does Staff recommend to correct for the Company's treatment of this land as a depreciable asset?
- A. Staff recommends that the following two adjustments to the Accounting Schedules filed with the Direct Testimony Staff Report.
 - 1. Reverse \$101,799 of the retirement entry in the accumulated reserves for the Shawnee Bend waste water treatment equipment Account 372, thus increasing reserves by \$101,799.
 - 2. Enter an adjustment of \$61,830 to reverse the depreciation accrued in Account 372 reserves for **land** depreciated at a 4.5% depreciation rate over a 162 month period from January 1999 through June 2012, thus reducing reserves by \$61,830.

- These two adjustments result in a reduction of net plant (rate base) for Shawnee Bend sewer by
- 2 \$39,969 as compared to the amount shown in the Staff Report filed November 15, 2013.

CIAC ASSOCIATED WITH THE \$38,535 PLANT TRANSFER

- Q. What is the issue related to CIAC associated with the Staff recommended account transfer of \$38,535 of Horseshoe Bend plant piping to the Shawnee Bend accounts?
- A. In the Staff Report depreciation section pages 35 and 36, Staff recommended correcting an accounting recording error in plant that occurred in 2007. That error is the recording of \$38,535 of original cost sewer Force Mains in the Horseshoe Bend accounts that was actually installed in the Shawnee Bend system. Staff's recommendation in the Staff accounting schedules filed November 15, 2013, did not recognize that CIAC and CIAC amortization was associated with the \$38,535 in plant. The November 15th accounting schedules show a transfer of \$35,535 of plant in service and a transfer of \$9,537 in associated depreciation reserves, but no transfer of associated CIAC or associated CIAC accumulated amortization.
- Q. What are the adjustment amounts Staff recommends for CIAC and the associated CIAC accumulated amortization?
- A. Staff recommends a transfer of \$38,535 of CIAC and \$1,506 of accumulated CIAC amortization from Horseshoe Bend Sewer to Shawnee Bend Sewer.

STAFF'S CONCLUSION

Staff would make the following adjustments to its accounting schedules to account for the 2012 retirement of the Shawnee Bend waste water treatment lagoon and the recording of certain developer contributions in aid of construction:

Rebuttal Testimony of Arthur W. Rice

1	1.	Reverse \$101,799 of the retirement entry for land in the accumulated
2		reserves for the Shawnee Bend waste water treatment equipment
3		Account 372, increasing reserves by \$101,799.
4	2.	Enter an adjustment of \$61,830 to reverse the depreciation accrued in
5		Account 372 land, reducing the reserves by \$61,830
6	3	Transfer \$38,535 of CIAC and \$1,506 of accumulated CIAC amortization
7		from Horseshoe Bend Sewer to Shawnee Bend Sewer.
8	Q. Does t	his end your testimony?
9	A. Yes.	

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Lake Region Water & Sewer) Company's Application to Implement a) General Rate Increase in Water & Sewer) Service)
AFFIDAVIT OF ARTHUR W. RICE, PE
STATE OF MISSOURI)) ss. COUNTY OF COLE)
Arthur W. Rice, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Rebuttal Testimony in question and answer form, consisting of
<u>Quela W Peice</u> Arthur W. Rice
Subscribed and sworn to before me this day of January, 2014.
D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: December 12, 2016 Commission Number: 12412070