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# Exhibit No. 12

Confluence Rivers – Exhibit 12  
Lyons Direct  
File No. WR-2023-0006

Exhibit No.: \_\_\_\_\_

Issue: Class Cost of Service Study and Rate  
Design

Witness: Timothy S. Lyons

Type of Exhibit: Direct Testimony

Sponsoring Party: Confluence Rivers Utility  
Operating Company

Case No.: WR-2023-0006 / SR-2023-0007

Date Testimony Prepared: December 21, 2022

**Before the Public Service Commission  
of the State of Missouri**

**Direct Testimony**

**of**

**Timothy S. Lyons**

**on behalf of**

**Confluence Rivers Utility Operating Company**

**December 21, 2022**

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CONFLUENCE RIVERS UTILITY OPERATING COMPANY  
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
CASE NO. WR-2023-0006 / SR-2023-0007

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DIRECT TESTIMONY OF TIMOTHY S. LYONS  
CONFLUENCE RIVERS UTILITY OPERATING COMPANY  
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
CASE NO. WR-2023-0006 / SR-2023-0007

1     **I.     INTRODUCTION**

2     **Q.     Please state your name and business address.**

3     A.     My name is Timothy S. Lyons. My business address is 1900 West Park Drive, Suite 250,  
4           Westborough, Massachusetts, 01581.

5

6     **Q.     By whom are you employed and in what capacity?**

7     A.     I am a Partner at ScottMadden, Inc. (“ScottMadden”).

8

9     **Q.     On whose behalf are you testifying in this proceeding?**

10    A.     I am testifying on behalf of Confluence Rivers Utility Operating Company (“Confluence  
11           Rivers” or the “Company”).

12

13    **Q.     Please describe your professional and educational experience.**

14    A.     I have more than 30 years of experience in the energy industry. I started my career in 1985  
15           at Boston Gas Company, eventually becoming Director of Rates and Revenue Analysis.  
16           In 1993, I moved to Providence Gas Company, eventually becoming Vice President of  
17           Marketing and Regulatory Affairs. Starting in 2001, I held several management consulting  
18           positions in the energy industry first at KEMA and then at Quantec, LLC. In 2005, I  
19           became Vice President of Sales and Marketing at Vermont Gas Systems, Inc. In 2013, I  
20           joined Sussex Economic Advisors, LLC (“Sussex”). Sussex was acquired by ScottMadden  
21           in 2016.

1 I hold a bachelor's degree from St. Anselm College, a master's degree in Economics from  
2 The Pennsylvania State University, and a master's degree in Business Administration from  
3 Babson College.

4  
5 **Q. Have you previously testified before the Missouri Public Service Commission**  
6 **(“Commission”) or any other regulatory agency?**

7 A. Yes. I previously sponsored testimony before this Commission as well as 21 other state  
8 regulatory commissions. Direct Schedule TSL-1 contains a list of regulatory proceedings  
9 in which I have sponsored testimony.

10  
11 **Q. What is the purpose of your Direct Testimony?**

12 A. The purpose of my direct testimony is to sponsor proposed water and sewer charges for the  
13 Company's Missouri jurisdiction. My Direct Testimony includes: (a) a description of the  
14 current rate classes; (b) development of the cost of service study; and (c) development of  
15 the proposed rate design and bill impact analyses.

16  
17 **Q. Have you prepared schedules to support this testimony?**

18 A. Yes. Direct Schedule TSL-2 through Direct Schedule TSL-4 summarize the results of the  
19 cost of service study, rate design proposals, and bill impact analysis. The Schedules were  
20 prepared by me or under my direction.

21  
22 **II. OVERVIEW**

23 **Q. Please describe the Company's water and sewer service area.**

1 A. The Company's water service area consists of 25 individual service areas including  
2 communities that were formerly part of Hillcrest, Indian Hills, Elm Hills, Osage, and  
3 Confluence Rivers. The Company's sewer area consists of 28 individual service areas  
4 including communities that were formerly part of Hillcrest, Elm Hills, Osage, Confluence  
5 Rivers, and Raccoon Creek.<sup>1</sup>

6  
7 **Q. What is the Company's current rate structure for water service?**

8 A. Presently, the Company's rate structure is divided into customers with metered service and  
9 customers with unmetered service.

10 For customers with metered water service (i.e., there is a meter to record water  
11 usage), the rate structure consists of a monthly base charge and usage charge. In some  
12 service areas, such as Port Perry, the monthly base charge includes a minimum amount of  
13 water, such as 2,000 gallons. In other service areas, such as Hillcrest, the monthly base  
14 charge includes no minimum amount of water.

15 For customers with unmetered water service (i.e., there is no meter to record water  
16 usage), the rate structure consists only of a monthly base charge.

17 Presently, the Company's rate structure reflects a wide range of charges for water  
18 service. One of the Company's goals in this rate case is to consolidate those charges into  
19 a single charge across the service areas.

20  
21 **Q. What is the Company's current rate structure for sewer service?**

---

<sup>1</sup> My quantification of service areas already reflects that certain service areas have been consolidated for ratemaking purposes. In such a case, I treat these consolidated areas as a single service area. Therefore, the number of service areas is different than the number of service areas identified in the tariffs or the number of facilities which have specific National Pollution Discharge Elimination System (NPDES) or Public Water System (PWS) permits.

1 A. Presently, the Company's rate structure for sewer service consists only of a monthly base  
2 charge since sewer service is not metered.

3 Presently, the Company's rate structure reflects a wide range of charges for sewer  
4 service. One of the Company's goals in this rate case is to consolidate those charges into  
5 a single charge across the service areas.

7 **III. COST OF SERVICE STUDY**

8 **Q. What were the results of the water cost of service?**

9 A. A summary of the water cost of service is shown in Figure 1 (below).

10 **Figure 1: Summary of Water Cost of Service**

Confluence Rivers Utility Operating Company, LLC		Residential/	
Class Cost of Service Summary	Total	Commercial	
<b>Operating Revenues</b>	\$ 2,192,868	\$ 2,192,868	
<b>Operating Expenses</b>			
Source of Supply	\$ 6,784	\$ 6,784	
Pumping	\$ 120,781	\$ 120,781	
Water Treatment	\$ 764,660	\$ 764,660	
Transmission & Distribution	\$ 22,482	\$ 22,482	
Customer Accounts	\$ 193,323	\$ 193,323	
Administrative & General	\$ 903,452	\$ 903,452	
Depreciation & Amortization	\$ 378,406	\$ 378,406	
Taxes	\$ 15,108	\$ 15,108	
<b>Total Operating Expenses</b>	\$ 2,404,996	\$ 2,404,996	
<b>Net Income</b>	\$ (212,128)	\$ (212,128)	
Current ROR	-2.41%	-2.41%	
<b>Rate Base</b>	\$ 8,820,082	\$ 8,820,082	
Required Rate of Return	9.6876%	9.6876%	
<b>Required Net Income</b>	\$ 854,455	\$ 854,455	
<b>Operating Income Deficiency</b>	\$ 1,066,583	\$ 1,066,583	
Weighted Return on Equity	7.3778%	7.3778%	
Net Income Required for Equity	\$ 650,724	\$ 650,724	
Gross Revenue Conversion Factor	101.01%	101.01%	
Gross Income Conversion Factor	133.19%	133.19%	
Revenue Deficiency	\$ 1,286,748	\$ 1,286,748	
<b>Total Revenue Requirement</b>	\$ 3,479,616	\$ 3,479,616	
Revenue Increase	\$ 1,286,748	\$ 1,286,748	
Revenue Increase %	58.68%	58.68%	

1 The Figure shows the Company's proposed cost of service of \$3.5 million reflects a  
2 revenue increase of \$1.3 million, or 58.68 percent.

3 **Q. What were the results of the sewer cost of service?**

4 A. A summary of the sewer cost of service is shown in Figure 2 (below).

5 **Figure 2: Summary of Sewer Cost of Service**

Confluence Rivers Utility Operating Company, LLC		Residential/ Commercial	
Sewer Cost of Service Summary	Total		
<b>Operating Revenues</b>	\$ 2,823,456	\$	2,823,456
<b>Operating Expenses</b>			
General & Admin	\$ 1,168,922	\$	1,168,922
Operations and Maintenance	\$ 1,511,786	\$	1,511,786
Depreciation & Amortization	\$ 617,466	\$	617,466
<b>Total Operating Expenses</b>	<b>\$ 3,298,173</b>	<b>\$</b>	<b>3,298,173</b>
<b>Net Income</b>	\$ (474,718)	\$	(474,718)
Current ROR	-4.17%		-4.17%
<b>Rate Base</b>	<b>\$ 11,370,562</b>	<b>\$</b>	<b>11,370,562</b>
Required Rate of Return	9.6876%		9.6876%
<b>Required Net Income</b>	<b>\$ 1,101,535</b>	<b>\$</b>	<b>1,101,535</b>
<b>Operating Income Deficiency</b>	\$ 1,576,253	\$	1,576,253
Weighted Return on Equity	7.3778%		7.3778%
Net Income Required for Equity	\$ 838,892	\$	838,892
Gross Revenue Conversion Factor	101.01%		101.01%
Gross Income Conversion Factor	133.19%		133.19%
Revenue Deficiency	\$ 1,862,116	\$	1,862,116
<b>Total Revenue Requirement</b>	<b>\$ 4,685,572</b>	<b>\$</b>	<b>4,685,572</b>
Revenue Increase	\$ 1,862,116	\$	1,862,116
Revenue Increase %	65.95%		65.95%

6  
7 The Figure shows the Company's proposed cost of service of \$4.7 million reflects a  
8 revenue increase of \$1.9 million, or 65.95 percent.

9  
10 **IV. RATE DESIGN**

11 **Q. How were the proposed charges for water service derived?**



1 A. The proposed charges for water service were derived by first apportioning the revenue  
2 requirement between unmetered and metered service based on current revenues, as shown  
3 in Figure 3 (below).

4 **Figure 3: Derivation of Water Charges**

<b>Total Revenue Requirement</b>	<b>\$</b>	<b>3,479,616</b>
<b>Unmetered Revenue Requirement</b>	<b>\$</b>	<b>1,003,908</b>
<b>Number of Bills</b>		<b>12,152</b>
<b>Proposed Fixed Charge</b>	<b>\$</b>	<b>82.62</b>
<b>Metered Revenue Requirement</b>	<b>\$</b>	<b>2,475,708</b>
<b>Proposed Fixed Charge Revenues</b>	<b>\$</b>	<b>1,411,767</b>
<b>Number of Bills</b>		<b>40,345</b>
<b>Proposed Fixed Charge</b>	<b>\$</b>	<b>34.99</b>
<b>Proposed Usage Charge Revenues</b>	<b>\$</b>	<b>1,063,941</b>
<b>Total Usage</b>		<b>111,561</b>
<b>Proposed Usage Charge</b>		<b>9.54</b>

5  
6 The Figure shows 28.85 percent of the revenue requirement was apportioned to unmetered  
7 service and 71.15 percent was apportioned to metered service.

8 The proposed fixed charge for unmetered service of \$82.62 per month was derived  
9 by dividing the revenue requirement for unmetered service of \$1.0 million by the number  
10 of bills of 12,152, as shown in Figure 3 (above).

11 The proposed fixed charge for metered service was derived by first identifying the  
12 customer-related portion (\$0.7 million) of the metered revenue requirements (\$2.5  
13 million), or 28.7 percent. The customer-related portion of 28.7 percent represents a  
14 significant decrease from the current fixed charge portion of current revenues, 71.2 percent,  
15 raising customer bill impact concerns for high usage customers and revenue stability  
16 concerns for the Company. To address these concerns, the Company proposes to recover  
17 57.0 percent of the metered revenue requirement through fixed charges and the remaining

1 portion through usage charges. The Company's proposal reflects a 33.3 percent movement  
2 towards recovering only customer-related costs from the fixed charges. The proposed fixed  
3 charge for metered service of \$34.99 was derived by dividing the fixed charge portion (\$1.4  
4 million) of the metered revenue requirements by the number of bills of 40,345.

5 The Company proposes the new water fixed charges exclude any water usage.  
6 Accordingly, the Company proposes the water usage charges are based on all water usage  
7 (i.e., there is no minimum water usage in the fixed charges). The proposed usage charge  
8 for metered service of \$9.54 per 1,000 gallons was derived by dividing the usage portion  
9 of the metered revenue requirement of \$1.1 million by total water usage of 111,561 1,000-  
10 gallons.

11  
12 **Q. Did you examine the customer bill impacts associated with the proposed water service**  
13 **rates?**

14 A. Yes, the customer bill impacts associated with the proposed water service rates are included  
15 in Direct Schedule TSL-4. The customer bill impacts compare the proposed charges to  
16 those in effect during the test year.

17  
18 **Q. How were the proposed charges for sewer service derived?**

19 A. The proposed charge for sewer service of \$82.96 per month was derived by dividing the  
20 revenue requirement for sewer service of \$4.7 million by the number of bills of 56,481, as  
21 shown in Figure 4 (below).

1

**Figure 4: Derivation of Sewer Charge**

<b>Total Revenue Requirement</b>	<b>\$</b>	<b>4,685,572</b>
Number of Bills		56,481
Proposed Fixed Charge	<b>\$</b>	<b>82.96</b>

2

3

4 **Q. Did you examine the customer bill impacts associated with the proposed sewer rates?**

5 A. Yes, the customer bill impacts associated with the proposed sewer rates are included in  
6 Direct Schedule TSL-4. The customer bill impacts compare the proposed charges to those  
7 in effect during the test year.

8

9 **Q. Does this conclude your Direct Testimony?**

10 A. Yes, it does.

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

In the Matter of Confluence Rivers Utility	)	
Operating Company, Inc.'s Request for Authority	)	
to Implement a General Rate Increase for Water	)	<b>File No. WR-2023-0006</b>
Service and Sewer Service Provided in Missouri	)	<b>File No. SR-2023-0007</b>
Service Areas.	)	

**AFFIDAVIT OF TIMOTHY S. LYONS**

I, Timothy S. Lyons, under penalty of perjury, and pursuant to Section 509.030, RSMo, state that I am a Partner with ScottMadden, Inc., that I have been retained by Confluence Rivers Utility Operating Company to provide testimony in the above-captioned docket; that the accompanying testimony has been prepared by me or under my direction and supervision; that if inquiries were made as to the facts in said testimony, I would respond as therein set forth; and that the aforesaid testimony is true and correct to the best of my knowledge and belief.

/s/ Timothy S. Lyons  
Timothy S. Lyons

December 21, 2022  
Dated

### Summary

Tim Lyons is a partner with ScottMadden with more than 30 years of experience in the energy industry. Tim has held senior positions at several gas utilities and energy consulting firms. His experience includes rates and regulatory support, sales and marketing, customer service and strategy development. Prior to joining ScottMadden, Tim served as Vice President of Sales and Marketing for Vermont Gas. He has also served as Vice President of Marketing and Regulatory Affairs for Providence Gas Company, Director of Rates at Boston Gas Company, and Project Director at Quantec, LLC, an energy consulting firm.

Tim has sponsored testimony before 22 state regulatory commissions. Tim holds a B.A. from St. Anselm College, an M.A. in Economics from The Pennsylvania State University, and an M.B.A. from Babson College.

### Areas of Specialization

- Regulation and Rates
- Retail Energy
- Utilities
- Natural Gas

### Capabilities

- Regulatory Strategy and Rate Case Support
- Strategic and Business Planning
- Capital Project Planning
- Process Improvements

### Articles

- "Country Strong: Vermont Gas shares its comprehensive effort to expand natural gas service into rural communities." **American Gas Association**, June 2011 (with Don Gilbert).
- "Talking Safety With Vermont Gas." **American Gas Association**, February 2009 (with Dave Attig).
- "Consumers Say 'Act Now' To Stabilize Prices." **Power & Gas Marketing**, September/October 2001 (with Jim DeMetro and Gerry Yurkevicz).
- "Rate Reclassification: Who Buys What and When." **Public Utilities Fortnightly**, October 15, 1991 (with John Martin).

Sponsor	Date	Docket No.	Subject
<b>Regulatory Commission of Alaska</b>			
Cook Inlet Natural Gas Storage Alaska, LLC	7/21	Docket No. U-21-058	Sponsored testimony supporting the lead-lag study/cash working capital requirement for a general rate case proceeding.
ENSTAR Natural Gas Company	06/16	Docket No. U-16-066	Adopted and sponsored testimony supporting a lead-lag study for a general rate case proceeding.
<b>Arizona Corporation Commission</b>			
Southwest Gas Corporation	12/21	Docket No. G-01551A-21-0368	Sponsored testimony supporting class cost of service, rate design and bill impact analysis for a general rate case proceeding.
<b>Arkansas Public Service Commission</b>			
Liberty Utilities (Pine Bluff Water)	10/18	Docket No. 18-027-U	Sponsored testimony supporting the cost of service, rate design and bill impact studies for a general rate case proceeding.
<b>California Public Utilities Commission</b>			
Liberty Utilities (CalPeco Electric)	5/21	Docket No. A 21-05-017	Sponsored testimony supporting the lead-lag study/cash working capital, marginal cost study, rate design and bill impact analysis for a general rate case proceeding.
Southwest Gas Corporation (Southern California, Northern California and South Lake Tahoe jurisdictions)	8/19	Docket No. A.19-08-015	Sponsored testimony on behalf of three separate rate jurisdictions supporting revenue requirements, lead-lag/ cash working capital, and class cost of service, rate design and bill impact analysis for a general rate case proceeding.
<b>Connecticut Public Utilities Regulatory Authority</b>			
Yankee Gas Company	07/14	Docket No. 13-06-02	Sponsored report and testimony supporting the review and evaluation of gas expansion policies, procedures and analysis.
<b>Illinois Commerce Commission</b>			
Liberty Utilities (Midstates Natural Gas)	07/16	Docket No. 16-0401	Sponsored testimony supporting the cost of service, rate design and bill impact studies for a general rate case proceeding. The testimony includes proposal for new commercial classes and a decoupling mechanism.
<b>Iowa Utilities Board</b>			
Liberty Utilities (Midstates Natural Gas)	07/16	Docket No. RPU-2016-0003	Sponsored testimony supporting the cost of service, rate design and bill impact studies for a general rate case proceeding. The testimony includes proposal for new commercial classes.
<b>Kansas Corporation Commission</b>			
The Empire District Electric Company	12/18	Docket No. 19-EPDE-223-RTS	Sponsored testimony supporting cost of service, rate design, bill impact and lead-lag studies for a general rate case proceeding.
<b>Maine Public Utilities Commission</b>			
Maine Water Company	03/21	Docket No. 2021-00053	Sponsored testimony supporting a proposed rate smoothing mechanism.
Northern Utilities, Inc. d/b/a Unutil	06/19	Docket No. 2019-00092	Sponsored testimony supporting a proposed capital investment cost recovery mechanism.

Sponsor	Date	Docket No.	Subject
Northern Utilities, Inc. d/b/a Unutil	06/15	Docket No. 2015-00146	Sponsored testimony supporting the proposed gas expansion program, including a zone area surcharge.
<b>Maryland Public Service Commission</b>			
Sandpiper Energy, a Chesapeake Utilities company	12/15	Case No. 9410	Sponsored testimony supporting the cost of service, rate design and bill impact studies for a general rate case proceeding. The testimony includes proposal for new residential and commercial classes.
<b>Massachusetts Department of Public Utilities</b>			
Liberty Utilities (New England Gas Company)	08/20	Docket No. DPU 20-92	Sponsored the Long-Range Forecast and Supply Plan filing for the five-year forecast period 2020/2021 through 2024/2025.
Liberty Utilities (New England Gas Company)	07/18	Docket No. DPU 18-68	Sponsored the Long-Range Forecast and Supply Plan filing for the five-year forecast period 2018/2019 through 2022/2023.
Liberty Utilities (New England Gas Company)	07/16	Docket No. DPU 16-109	Sponsored the Long-Range Forecast and Supply Plan filing for the five-year forecast period 2016/2017 through 2020/2021.
Boston Gas	10/93	Docket No. DPU 92-230	Sponsored testimony describing the Company's position regarding rate treatment of vehicular natural gas investments and expenses.
Boston Gas	03/90	Docket No. DPU 90-55	Sponsored testimony supporting the weather and other cost of service adjustments, rate design and customer bill impact studies for a general rate case proceeding.
Boston Gas	03/88	Docket No. DPU 88-67-II	Sponsored testimony supporting the rate reclassification of commercial and industrial customers for a rate design proceeding.
<b>Michigan Public Service Commission</b>			
Lansing Board of Water & Light and Michigan State University	04/20	Docket No. U-20650	Sponsored testimony evaluating Consumer Energy's cost of service and rate design proposals.
Lansing Board of Water & Light and Michigan State University	04/19	Docket No. U-20322	Sponsored testimony evaluating Consumer Energy's cost of service and rate design proposals.
Midland Cogeneration Ventures, LLC	09/18	Docket No. U-18010	Sponsored testimony evaluating Consumer Energy's cost of service and rate design proposals.
<b>Minnesota Public Utilities Commission</b>			
Northern States Power Company (XcelEnergy)	10/21	Docket No. E002/GR-21-630	Sponsored testimony supporting a Return on Equity (ROE) adjustment mechanism that would allow the Company to symmetrically adjust its ROE to reflect significant changes in financial market conditions.
<b>Missouri Public Service Commission</b>			
The Empire District Gas Company	08/21	Docket No. GR-2021-0320	Sponsored testimony supporting the cost of service, rate design, bill impact and lead-lag studies for a general rate case proceeding.

Sponsor	Date	Docket No.	Subject
The Empire District Electric Company	05/21	Docket No. ER-2021-0312	Sponsored testimony supporting the cost of service, rate design, bill impact and lead-lag studies for a general rate case proceeding.
Spire Missouri, Inc.	12/20	Docket No. GR-2021-0108	Sponsored testimony supporting class cost of service, rate design, and lead-lag study proposals for a general rate case proceeding. The testimony also included support for a proposed revenue adjustment mechanism.
The Empire District Electric Company	08/19	Docket No. ER-2019-0374	Sponsored testimony supporting the cost of service, rate design, bill impact and lead-lag studies for a general rate case proceeding. The testimony also included proposals for a weather normalization mechanism.
Liberty Utilities (Midstates Natural Gas)	09/17	Docket No. GR-2018-0013	Sponsored testimony supporting the cost of service, rate design, bill impact and lead-lag studies for a general rate case proceeding. The testimony also included proposals for a revenue decoupling/ weather normalization mechanism as well as tracker accounts for certain O&M expenses and capital costs.
Missouri Gas Energy	04/17	Docket No. GR-2017-0216	Sponsored testimony supporting the cost of service, rate design, bill impact and Lead/Lag studies for a general rate case proceeding. The testimony included support for a decoupling mechanism.
Laclede Gas Company	04/17	Docket No. GR-2017-0215	Sponsored testimony supporting the cost of service, rate design, bill impact and Lead/Lag studies for a general rate case proceeding. The testimony included support for a decoupling mechanism.
<b>Nevada Public Utilities Commission</b>			
Southwest Gas Corporation	09/21	Docket No. 21-09001	Sponsored testimony supporting the class cost of service, rate design, bill impact and Lead/Lag studies for a general rate case proceeding.
Southwest Gas Corporation	02/20	Docket No. 20-02023	Sponsored testimony supporting the class cost of service, rate design, bill impact and Lead/Lag studies for a general rate case proceeding.
<b>New Hampshire Public Utilities Commission</b>			
Unitil (Northern Utilities, Inc.)	8/21	Docket No. DG 21-104	Sponsored testimony supporting a revenue decoupling mechanism.
Unitil Energy Systems, Inc.	4/21	Docket No. DE 21-030	Sponsored testimony supporting a revenue decoupling mechanism.
Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities	11/17	Docket No. DG 17-198	Sponsored testimony supporting a levelized cost analysis for approval of firm supply and transportation agreements.
Liberty Utilities d/b/a Granite State Electric Company	04/16	Docket No. DE 16-383	Adopted testimony and sponsored Lead/Lag study for a general rate case proceeding.
<b>New Jersey Board of Public Utilities</b>			
South Jersey Gas Company	04/22	Docket No. GR22040253	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.



Sponsor	Date	Docket No.	Subject
Elizabethtown Gas Company	12/21	Docket No. GR21121254	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
South Jersey Gas Company	03/20	Docket No. GR20030243	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
Elizabethtown Gas Company	04/19	Docket No. GR19040486	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
Pivotal Utility Holdings, Inc. d/b/a Elizabethtown Gas Company	08/16	Docket No. GR16090826	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
<b>Corporation Commission of Oklahoma</b>			
The Empire District Electric Company	02/21	Cause No. PUD 202100163	Sponsored testimony supporting the cost of service, rate design, bill impact and Lead/Lag studies for a general rate case proceeding.
The Empire District Electric Company	03/19	Cause No. PUD 201800133	Sponsored testimony supporting the cost of service, rate design, bill impact and Lead/Lag studies for a general rate case proceeding.
The Empire District Electric Company	04/17	Cause No. PUD 201600468	Adopted direct testimony and sponsored rebuttal testimony supporting the revenue requirements for a general rate case proceeding. The testimony included proposals for alternative ratemaking mechanisms.
<b>Rhode Island Public Utilities Commission</b>			
Providence Gas Company	08/01 09/00 08/96	Docket No. 1673	Sponsored testimony supporting the changes in cost of gas adjustment factor related to projected under-recovery of gas costs; Filed testimony and witness for pilot hedging program to mitigate price risks to customers; Filed testimony and witness for changes in cost of gas adjustment factor related to extension of rate plan.
Providence Gas Company	08/00	Docket No. 2581	Sponsored testimony supporting the extension of a rate plan that began in 1997 and included certain modifications, including a weather normalization clause.
Providence Gas Company	03/00	Docket No. 3100	Sponsored testimony supporting the de-tariff and deregulation of appliance repair service, enabling the Company to have needed pricing flexibility.
Providence Gas Company	06/97	Docket No. 2581	Sponsored testimony supporting a rate plan that fixed all billing rates for three-year period; included funding for critical infrastructure investments in accelerated replacement of mains and services, digitized records system, and economic development projects.
Providence Gas Company	04/97	Docket No. 2552	Sponsored testimony supporting the rate design, customer bill impact studies and retail access tariffs for commercial and industrial customers, including redesign of cost of gas

Sponsor	Date	Docket No.	Subject
			adjustment clause, for a rate design proceeding.
Providence Gas Company	02/96	Docket No. 2374	Sponsored testimony supporting the rate design, customer bill impact studies and retail access tariffs for largest commercial and industrial customers for a rate design proceeding.
Providence Gas Company	01/96	Docket No. 2076	Sponsored testimony supporting the rate reclassification of customers into new rate classes, rate design (including introduction of demand charges), and customer bill impact studies for a rate design proceeding.
Providence Gas Company	11/92	Docket No. 2025	Sponsored testimony supporting the Integrated Resource Plan filing, including a performance-based incentive mechanism.
<b>Railroad Commission of Texas</b>			
Texas Gas Service Company – Central Texas and Gulf Coast Service Areas	12/19	GUD No. 10928	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
CenterPoint Energy – Beaumont/ East Texas Division	11/19	GUD No. 10920	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
Texas Gas Service Company – Borger/ Skellytown Service Area	08/18	GUD No. 10766	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
Texas Gas Service Company – North Texas Service Area	06/18	GUD No. 10739	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
CenterPoint Energy – South Texas Division	11/17	GUD No. 10669	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
Texas Gas Service Company – Rio Grande Valley Service Area	06/17	GUD No. 10656	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
Atmos Pipeline – Texas	01/17	GUD No. 10580	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
CenterPoint Energy – Texas Gulf Division	11/16	GUD No. 10567	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
<b>Public Utility Commission of Texas</b>			
CenterPoint Energy Houston Electric, LLC	04/19	Docket No. 49421	Sponsored testimony supporting the Lead/Lag study for a general rate case proceeding.
<b>Vermont Public Utilities Commission</b>			
Vermont Gas Systems	12/12	Docket No. 7970	Sponsored testimony describing the market served by \$90 million natural gas expansion project to Addison County, VT. Also described the terms and economic benefits of a special contract with International Paper.

Sponsor	Date	Docket No.	Subject
Vermont Gas Systems	02/11	Docket No. 7712	Sponsored testimony supporting the market evaluation and analysis for a system expansion and reliability regulatory fund.
<b>Virginia State Corporation Commission</b>			
American Electric Power - Appalachian Power Company	3/20	Case No. PUR-2020-00015	Sponsored testimony supporting the Lead/Lag study for the 2020 triennial review of base rates, terms, and conditions.

## Water Service

### Cost of Service Summary

Confluence Rivers Utility Operating Company, LLC Class Cost of Service Summary	Total	Residential/ Commercial
<b>Operating Revenues</b>	<b>\$ 2,192,868</b>	<b>\$ 2,192,868</b>
<b>Operating Expenses</b>		
Source of Supply	\$ 6,784	\$ 6,784
Pumping	\$ 120,781	\$ 120,781
Water Treatment	\$ 764,660	\$ 764,660
Transmission & Distribution	\$ 22,482	\$ 22,482
Customer Accounts	\$ 193,323	\$ 193,323
Administrative & General	\$ 903,452	\$ 903,452
Depreciation & Amortization	\$ 378,406	\$ 378,406
Taxes	\$ 15,108	\$ 15,108
<b>Total Operating Expenses</b>	<b>\$ 2,404,996</b>	<b>\$ 2,404,996</b>
<b>Net Income</b>	<b>\$ (212,128)</b>	<b>\$ (212,128)</b>
Current ROR	-2.41%	-2.41%
<b>Rate Base</b>	<b>\$ 8,820,082</b>	<b>\$ 8,820,082</b>
Required Rate of Return	9.6876%	9.6876%
<b>Required Net Income</b>	<b>\$ 854,455</b>	<b>\$ 854,455</b>
<b>Operating Income Deficiency</b>	<b>\$ 1,066,583</b>	<b>\$ 1,066,583</b>
Weighted Return on Equity	7.3778%	7.3778%
Net Income Required for Equity	\$ 650,724	\$ 650,724
Gross Revenue Conversion Factor	101.01%	101.01%
Gross Income Conversion Factor	133.19%	133.19%
Revenue Deficiency	\$ 1,286,748	\$ 1,286,748
<b>Total Revenue Requirement</b>	<b>\$ 3,479,616</b>	<b>\$ 3,479,616</b>
Revenue Increase	\$ 1,286,748	\$ 1,286,748
Revenue Increase %	58.68%	58.68%

**Sewer Service**  
 Cost of Service Summary

Confluence Rivers Utility Operating Company, LLC Sewer Cost of Service Summary	Total	Residential/ Commercial
<b>Operating Revenues</b>	\$ 2,823,456	\$ 2,823,456
<b>Operating Expenses</b>		
General & Admin	\$ 1,168,922	\$ 1,168,922
Operations and Maintenance	\$ 1,511,786	\$ 1,511,786
Depreciation & Amortization	\$ 617,466	\$ 617,466
<b>Total Operating Expenses</b>	<b>\$ 3,298,173</b>	<b>\$ 3,298,173</b>
<b>Net Income</b>	\$ (474,718)	\$ (474,718)
Current ROR	-4.17%	-4.17%
<b>Rate Base</b>	<b>\$ 11,370,562</b>	<b>\$ 11,370,562</b>
Required Rate of Return	9.6876%	9.6876%
<b>Required Net Income</b>	<b>\$ 1,101,535</b>	<b>\$ 1,101,535</b>
<b>Operating Income Deficiency</b>	\$ 1,576,253	\$ 1,576,253
Weighted Return on Equity	7.3778%	7.3778%
Net Income Required for Equity	\$ 838,892	\$ 838,892
Gross Revenue Conversion Factor	101.01%	101.01%
Gross Income Conversion Factor	133.19%	133.19%
Revenue Deficiency	\$ 1,862,116	\$ 1,862,116
<b>Total Revenue Requirement</b>	<b>\$ 4,685,572</b>	<b>\$ 4,685,572</b>
Revenue Increase	\$ 1,862,116	\$ 1,862,116
Revenue Increase %	65.95%	65.95%

**Water Service**

Target Revenues and Rates

<b>Total Revenue Requirement</b>	<b>\$</b>	<b>3,479,616</b>
Revenue Increase	\$	1,286,748
Revenue Increase %		58.68%
<b>Unmetered Revenue Requirement</b>	<b>\$</b>	<b>1,003,908</b>
Number of Bills		12,152
Proposed Fixed Charge	\$	82.62
<b>Metered Revenue Requirement</b>	<b>\$</b>	<b>2,475,708</b>
Proposed Fixed Charge Revenues	\$	1,411,767
Number of Bills		40,345
Proposed Fixed Charge	\$	34.99
Proposed Usage Charge Revenues	\$	1,063,941
Total Usage		111,561
Proposed Usage Charge		9.54

**Sewer Service**

Target Revenues and Rates

<b>Total Revenue Requirement</b>	<b>\$</b>	<b>4,685,572</b>
Number of Bills		56,481
Proposed Fixed Charge	<b>\$</b>	<b>82.96</b>

**Water Service**  
 Unmetered Bill Impact Analysis

Confluence Rivers Utility Operating Company, Inc.			Current	Current	Proposed	Proposed				
Service Area	Original Entity	Customer Type	Number of Bills	Water Charge	Revenues	Water Charge	Revenues	Difference	Difference %	
Auburn Lakes	Confluence Rivers	Residential	522	\$ 69.63	\$ 36,347	\$ 82.62	\$ 43,126	\$ 6,779	18.6%	
Branson Cedar	Confluence Rivers	Commercial	3	61.99	211	82.62	281	70	33.3%	
Branson Cedar	Confluence Rivers	Residential	678	61.99	42,031	82.62	56,016	13,985	33.3%	
Calvey Brooks	Confluence Rivers	Residential	159	69.63	11,071	82.62	13,136	2,065	18.6%	
Cedar Green	Confluence Rivers	Residential	216	20.09	4,340	82.62	17,845	13,505	311.2%	
Glen Meadows	Glen Meadows	Residential	2,760	27.50	75,900	82.62	228,019	152,119	200.4%	
Missing Well	Confluence Rivers	Residential	254	20.00	5,078	82.62	20,978	15,899	313.1%	
Eugene	Confluence Rivers	Residential	1	69.63	70	82.62	83	13	18.6%	
Prairie Heights	Confluence Rivers	Residential	673	19.08	12,834	82.62	55,569	42,736	333.0%	
Rate Area 1	Elm Hills	Commercial	58	60.15	3,515	82.62	4,828	1,313	37.3%	
Rate Area 1	Elm Hills	Multifamily	1,060	60.15	63,773	82.62	87,591	23,819	37.3%	
Roy L Unmetered 1	Confluence Rivers	Residential	132	69.63	9,191	82.62	10,905	1,714	18.6%	
Roy L Unmetered 2	Confluence Rivers	Residential	180	50.64	9,115	82.62	14,871	5,756	63.1%	
Smithview	Confluence Rivers	Residential	1,364	71.25	97,196	82.62	112,701	15,505	16.0%	
Willows	Confluence Rivers	Commercial	12	69.63	836	82.62	991	156	18.6%	
Willows	Confluence Rivers	Residential	1,705	69.63	118,695	82.62	140,831	22,136	18.6%	
Spring Branch	Confluence Rivers	Residential	662	30.99	20,525	82.62	54,716	34,192	166.6%	
Majestic Lakes	Confluence Rivers	Residential	1,360	69.63	94,682	82.62	112,340	17,658	18.6%	
Rate Area 1	Elm Hills	Residential	352	60.15	21,173	82.62	29,081	7,908	37.3%	
			12,152	\$	626,582	\$	1,003,908	\$	377,326	60.2%
Cedar Green is a quarterly charge which was divided into monthly charges for purposes of analysis										

Note: Current charges reflect effective charges during the test year.



## Water Service Metered Bill Impact Analysis

Confluence Rivers Utility Operating Company, Inc.				Number of Bills	Total Water Usage	Billed Water Usage	Current				
Service Area	Original Entity	Customer Type	Meter Type				Fixed Charge	Fixed Revenues	Usage Charge	Usage Revenues	Total Revenues
Eugene	Confluence Rivers	Residential	3/4"	518	1,991	1,991	\$ 42.20	\$ 21,849	\$ 7.01	\$ 13,959	\$ 35,808
Eugene	Confluence Rivers	Commercial	3/4"	73	153	153	\$ 42.20	\$ 3,064	\$ 7.01	\$ 1,071	\$ 4,134
Evergreen	Confluence Rivers	Residential	3/4"	797	3,127	3,127	\$ 42.20	\$ 33,653	\$ 7.01	\$ 21,922	\$ 55,574
Evergreen	Confluence Rivers	Commercial	3/4"	12	-	-	\$ 42.20	\$ 511	\$ 7.01	\$ -	\$ 511
Fawn Lake	Confluence Rivers	Residential	3/4"	348	1,172	459	\$ 50.00	\$ 17,407	\$ 3.00	\$ 1,377	\$ 18,783
Gladlo	Confluence Rivers	Residential	3/4"	842	3,203	3,203	\$ 42.20	\$ 35,525	\$ 7.01	\$ 22,453	\$ 57,978
Hillcrest	Hillcrest	Residential	3/4"	2,750	9,932	9,932	\$ 40.48	\$ 111,339	\$ 7.35	\$ 73,001	\$ 184,340
Hillcrest	Hillcrest	Multifamily	3/4"	185	454	454	\$ 32.38	\$ 6,003	\$ 7.35	\$ 3,335	\$ 9,337
Hillcrest	Hillcrest	Commercial	3/4"	38	113	113	\$ 60.72	\$ 2,307	\$ 7.35	\$ 831	\$ 3,138
Indian Hills	Indian Hills	Residential	3/4"	7,797	15,218	15,218	\$ 50.90	\$ 396,865	\$ 9.80	\$ 149,091	\$ 545,956
Indian Hills	Indian Hills	Commercial	3/4"	48	43	43	\$ 50.90	\$ 2,443	\$ 9.80	\$ 429	\$ 2,872
Majestic Lakes	Confluence Rivers	Residential	3/4"	654	2,626	2,626	\$ 42.20	\$ 27,581	\$ 7.01	\$ 18,405	\$ 45,986
Osage	Osage	Residential	5/8"	4,509	5,208	2,202	\$ 24.76	\$ 111,645	\$ 5.86	\$ 12,901	\$ 124,547
Port Perry	Confluence Rivers	Residential	5/8"	220	326	133	\$ 13.50	\$ 2,968	\$ 3.58	\$ 475	\$ 3,444
Port Perry	Confluence Rivers	Residential	3/4"	822	989	424	\$ 13.50	\$ 11,093	\$ 3.58	\$ 1,519	\$ 12,611
Port Perry	Confluence Rivers	Residential	1 1/2"	2,921	4,075	2,027	\$ 13.50	\$ 39,433	\$ 3.58	\$ 7,258	\$ 46,691
Port Perry	Confluence Rivers	Residential	1"	12	7	-	\$ 13.50	\$ 166	\$ 3.58	\$ -	\$ 166
Port Perry	Confluence Rivers	Commercial	5/8"	49	137	122	\$ 13.50	\$ 668	\$ 3.58	\$ 436	\$ 1,104
Port Perry	Confluence Rivers	Commercial	3/4"	69	58	36	\$ 13.50	\$ 930	\$ 3.58	\$ 130	\$ 1,060
Port Perry	Confluence Rivers	Commercial	1 1/2"	854	293	93	\$ 13.50	\$ 11,527	\$ 3.58	\$ 332	\$ 11,859
Port Perry	Confluence Rivers	Commercial	2"	22	3	-	\$ 55.69	\$ 1,217	\$ 3.58	\$ -	\$ 1,217
Roy L	Confluence Rivers	Residential	3/4"	399	679	679	\$ 42.20	\$ 16,844	\$ 7.01	\$ 4,761	\$ 21,605
Terre Du Lac	Confluence Rivers	Residential	5/8"	16,132	58,381	58,381	\$ 14.85	\$ 239,559	\$ 1.80	\$ 105,086	\$ 344,645
Terre Du Lac	Confluence Rivers	Residential	3/4"	12	71	71	\$ 14.85	\$ 172	\$ 1.80	\$ 128	\$ 299
Terre Du Lac	Confluence Rivers	Residential	1"	14	0	0	\$ 37.14	\$ 523	\$ 1.80	\$ 0	\$ 523
Terre Du Lac	Confluence Rivers	Commercial	5/8"	207	1,110	1,110	\$ 14.85	\$ 3,077	\$ 1.80	\$ 1,997	\$ 5,074
Terre Du Lac	Confluence Rivers	Commercial	1"	36	347	347	\$ 37.14	\$ 1,341	\$ 1.80	\$ 625	\$ 1,966
Terre Du Lac	Confluence Rivers	Commercial	2"	6	1,846	1,846	\$ 118.85	\$ 663	\$ 1.80	\$ 3,322	\$ 3,985
<b>Total</b>				<b>40,345</b>	<b>111,561</b>	<b>104,789</b>	<b>\$ 27.27</b>	<b>\$ 1,100,351</b>		<b>\$ 444,844</b>	<b>\$ 1,545,195</b>

Note: Current charges reflect effective charges during the test year.

Confluence Rivers Utility Operating Company, Inc.				Number of Bills	Total Water Usage	Billed Water Usage	Proposed					Difference	Difference %
Service Area	Original Entity	Customer Type	Meter Type				Fixed Charge	Fixed Revenues	Usage Charge	Usage Revenues	Total Revenues		
Eugene	Confluence Rivers	Residential	3/4"	518	1,991	1,991	\$ 29.19	\$ 15,113	\$ 9.54	\$ 18,991	\$ 34,103	(1,704)	-4.8%
Eugene	Confluence Rivers	Commercial	3/4"	73	153	153	\$ 29.19	\$ 2,119	\$ 9.54	\$ 1,457	\$ 3,576	(559)	-13.5%
Evergreen	Confluence Rivers	Residential	3/4"	797	3,127	3,127	\$ 29.19	\$ 23,277	\$ 9.54	\$ 29,824	\$ 53,101	(2,473)	-4.5%
Evergreen	Confluence Rivers	Commercial	3/4"	12	-	-	\$ 29.19	\$ 353	\$ 9.54	\$ -	\$ 353	(157)	-30.8%
Fawn Lake	Confluence Rivers	Residential	3/4"	348	1,172	459	\$ 29.19	\$ 10,162	\$ 9.54	\$ 11,178	\$ 21,340	2,557	13.6%
Gladlo	Confluence Rivers	Residential	3/4"	842	3,203	3,203	\$ 29.19	\$ 24,573	\$ 9.54	\$ 30,546	\$ 55,119	(2,859)	-4.9%
Hillcrest	Hillcrest	Residential	3/4"	2,750	9,932	9,932	\$ 29.19	\$ 80,285	\$ 9.54	\$ 94,722	\$ 175,006	(9,334)	-5.1%
Hillcrest	Hillcrest	Multifamily	3/4"	185	454	454	\$ 29.19	\$ 5,411	\$ 9.54	\$ 4,327	\$ 9,738	401	4.3%
Hillcrest	Hillcrest	Commercial	3/4"	38	113	113	\$ 29.19	\$ 1,109	\$ 9.54	\$ 1,078	\$ 2,187	(951)	-30.3%
Indian Hills	Indian Hills	Residential	3/4"	7,797	15,218	15,218	\$ 29.19	\$ 227,589	\$ 9.54	\$ 145,130	\$ 372,719	(173,237)	-31.7%
Indian Hills	Indian Hills	Commercial	3/4"	48	43	43	\$ 29.19	\$ 1,401	\$ 9.54	\$ 413	\$ 1,814	(1,058)	-36.8%
Majestic Lakes	Confluence Rivers	Residential	3/4"	654	2,626	2,626	\$ 29.19	\$ 19,078	\$ 9.54	\$ 25,040	\$ 44,117	(1,869)	-4.1%
Osage	Osage	Residential	5/8"	4,509	5,208	2,202	\$ 29.19	\$ 131,618	\$ 9.54	\$ 49,669	\$ 181,288	\$ 56,741	45.6%
Port Perry	Confluence Rivers	Residential	5/8"	220	326	133	\$ 29.19	\$ 6,418	\$ 9.54	\$ 3,107	\$ 9,525	\$ 6,082	176.6%
Port Perry	Confluence Rivers	Residential	3/4"	822	989	424	\$ 29.19	\$ 23,984	\$ 9.54	\$ 9,429	\$ 33,413	\$ 20,802	164.9%
Port Perry	Confluence Rivers	Residential	1 1/2"	2,921	4,075	2,027	\$ 29.19	\$ 90,066	\$ 9.54	\$ 38,862	\$ 301,919	\$ 255,228	546.6%
Port Perry	Confluence Rivers	Residential	1"	12	7	-	\$ 29.19	\$ 350	\$ 9.54	\$ 68	\$ 706	\$ 540	326.1%
Port Perry	Confluence Rivers	Commercial	5/8"	49	137	122	\$ 29.19	\$ 1,444	\$ 9.54	\$ 1,310	\$ 2,754	\$ 1,649	149.4%
Port Perry	Confluence Rivers	Commercial	3/4"	69	58	36	\$ 29.19	\$ 2,011	\$ 9.54	\$ 549	\$ 2,560	\$ 1,500	141.6%
Port Perry	Confluence Rivers	Commercial	1 1/2"	854	293	93	\$ 29.19	\$ 76,901	\$ 9.54	\$ 2,793	\$ 79,694	\$ 67,835	572.0%
Port Perry	Confluence Rivers	Commercial	2"	22	3	-	\$ 135.71	\$ 2,966	\$ 9.54	\$ 28	\$ 2,994	\$ 1,777	146.0%
Roy L	Confluence Rivers	Residential	3/4"	399	679	679	\$ 29.19	\$ 11,651	\$ 9.54	\$ 6,478	\$ 18,128	(3,477)	-16.1%
Terre Du Lac	Confluence Rivers	Residential	5/8"	16,132	58,381	58,381	\$ 29.19	\$ 470,883	\$ 9.54	\$ 556,773	\$ 1,027,656	\$ 683,011	198.2%
Terre Du Lac	Confluence Rivers	Residential	3/4"	12	71	71	\$ 29.19	\$ 338	\$ 9.54	\$ 676	\$ 1,013	\$ 714	238.6%
Terre Du Lac	Confluence Rivers	Residential	1"	14	0	0	\$ 52.02	\$ 703	\$ 9.54	\$ 1	\$ 704	\$ 202	40.2%
Terre Du Lac	Confluence Rivers	Commercial	5/8"	207	1,110	1,110	\$ 29.19	\$ 6,048	\$ 9.54	\$ 10,582	\$ 16,630	\$ 11,556	227.7%
Terre Du Lac	Confluence Rivers	Commercial	1"	36	347	347	\$ 52.02	\$ 1,878	\$ 9.54	\$ 3,313	\$ 5,191	\$ 3,225	164.0%
Terre Du Lac	Confluence Rivers	Commercial	2"	6	1,846	1,846	\$ 135.71	\$ 757	\$ 9.54	\$ 17,600	\$ 18,357	\$ 14,372	360.7%
<b>Total</b>				<b>40,345</b>	<b>111,561</b>	<b>104,789</b>	<b>\$ 34.99</b>	<b>\$ 1,411,767</b>		<b>\$ 1,063,941</b>	<b>\$ 2,475,708</b>	<b>\$ 930,513</b>	<b>60.2%</b>

## Sewer Service Bill Impact Analysis

Confluence Rivers Utility Operating Company, Inc.			Adjusted	Current	Current	Proposed	Proposed		
Sewer Service Area	Original Entity	Customer Type	Number of Bills	Sewer Charge	Revenues	Sewer Charge	Revenues	Difference	Difference %
Auburn Lakes	Confluence Rivers	Residential	508	\$ 72.48	36,815	\$ 82.96	42,138	\$ 5,322	14.5%
Branson Cedar	Confluence Rivers	Commercial	3	\$ 92.96	316	\$ 82.96	282	\$ (34)	-10.8%
Branson Cedar	Confluence Rivers	Residential	678	\$ 61.97	42,018	\$ 82.96	56,248	\$ 14,231	33.9%
Calvey Brooks	Confluence Rivers	Residential	159	\$ 72.48	11,524	\$ 82.96	13,190	\$ 1,666	14.5%
Deer Run	Confluence Rivers	Residential	732	\$ 20.00	14,640	\$ 82.96	60,725	\$ 46,085	314.8%
Deguire	Confluence Rivers	Commercial	23	\$ 30.00	693	\$ 82.96	1,917	\$ 1,224	176.5%
Deguire	Confluence Rivers	Residential	251	\$ 20.00	5,027	\$ 82.96	20,850	\$ 15,824	314.8%
Cedar Green*	Confluence Rivers	Residential	216	\$ 35.66	7,703	\$ 82.96	17,919	\$ 10,216	132.6%
Rate Area 1	Elm Hills	Residential	2,720	\$ 99.88	271,689	\$ 82.96	225,659	\$ (46,030)	-16.9%
Rate Area 1	Elm Hills	Multifamily	1,818	\$ 99.88	181,543	\$ 82.96	150,785	\$ (30,757)	-16.9%
Rate Area 1	Elm Hills	Commercial	12	\$ 99.88	1,199	\$ 82.96	995	\$ (203)	-16.9%
Rate Area 2	Elm Hills	Residential	3,410	\$ 44.81	152,792	\$ 82.96	282,868	\$ 130,076	85.1%
Vacant Lot	Elm Hills	Residential	59	\$ 20.00	1,180	\$ 82.96	4,895	\$ 3,715	314.8%
Missing Well	Confluence Rivers	Residential	123	\$ 20.00	2,450	\$ 82.96	10,163	\$ 7,713	314.8%
Freeman Hills	Confluence Rivers	Residential	198	\$ 16.67	3,293	\$ 82.96	16,389	\$ 13,096	397.6%
Glen Meadows	Confluence Rivers	Residential	2,760	\$ 27.50	75,900	\$ 82.96	228,964	\$ 153,064	201.7%
Gladlo	Confluence Rivers	Residential	719	\$ 72.48	52,108	\$ 82.96	59,641	\$ 7,533	14.5%
Hillcrest	Hillcrest	Multifamily	257	\$ 66.85	17,206	\$ 82.96	21,352	\$ 4,146	24.1%
Hillcrest	Hillcrest	Residential	2,723	\$ 83.56	227,573	\$ 82.96	225,933	\$ (1,639)	-0.7%
Hillcrest	Hillcrest	Commercial	38	\$ 125.34	4,763	\$ 82.96	3,152	\$ (1,611)	-33.8%
Hunter's Ridge & Walnut	Raccoon Creek	Residential	3,105	\$ 95.76	297,329	\$ 82.96	257,579	\$ (39,749)	-13.4%
Lake Virginia	Confluence Rivers	Residential	450	\$ 72.48	32,616	\$ 82.96	37,331	\$ 4,715	14.5%
Majestic Lakes	Confluence Rivers	Residential	2,013	\$ 72.48	145,929	\$ 82.96	167,026	\$ 21,096	14.5%
Mill Creek	Confluence Rivers	Residential	897	\$ 72.48	65,019	\$ 82.96	74,419	\$ 9,400	14.5%
Osage	Osage	Residential	4,721	\$ 29.02	137,008	\$ 82.96	391,659	\$ 254,651	185.9%
Port Perry	Confluence Rivers	Residential	2,188	\$ 18.94	41,445	\$ 82.96	181,532	\$ 140,086	338.0%
Port Perry	Confluence Rivers	Commercial	972	\$ 14.21	13,816	\$ 82.96	80,657	\$ 66,841	483.8%
Prairie Heights	Confluence Rivers	Residential	19	\$ 25.00	475	\$ 82.96	1,576	\$ 1,101	231.8%
Roy L	Confluence Rivers	Residential	293	\$ 72.48	21,223	\$ 82.96	24,291	\$ 3,068	14.5%
Roy L Unmetered 1	Confluence Rivers	Residential	120	\$ 72.48	8,698	\$ 82.96	9,955	\$ 1,257	14.5%
Roy L Unmetered 2	Confluence Rivers	Residential	180	\$ 72.48	13,046	\$ 82.96	14,932	\$ 1,886	14.5%
Roy L3	Confluence Rivers	Residential	82	\$ 72.48	5,953	\$ 82.96	6,813	\$ 861	14.5%
Terre Du Lac	Confluence Rivers	Residential	15,819	\$ 19.72	311,944	\$ 82.96	1,312,285	\$ 1,000,341	320.7%
Terre Du Lac	Confluence Rivers	Commercial	180	\$ 19.72	3,554	\$ 82.96	14,950	\$ 11,396	320.7%
Terre Du Lac	Confluence Rivers	Commercial	36	\$ 49.29	1,780	\$ 82.96	2,996	\$ 1,216	68.3%
Terre Du Lac	Confluence Rivers	Commercial	6	\$ 157.74	880	\$ 82.96	463	\$ (417)	-47.4%
Clemstone	Confluence Rivers	Residential	295	\$ 60.00	17,710	\$ 82.96	24,487	\$ 6,777	38.3%
Villa Ridge	Confluence Rivers	Residential	2,460	\$ 72.48	178,267	\$ 82.96	204,039	\$ 25,771	14.5%
Villages	Raccoon Creek	Residential	3,507	\$ 79.74	279,653	\$ 82.96	290,939	\$ 11,286	4.0%
Willows	Confluence Rivers	Residential	1,719	\$ 72.48	124,573	\$ 82.96	142,582	\$ 18,009	14.5%
Willows	Confluence Rivers	Commercial	12	\$ 72.48	870	\$ 82.96	995	\$ 126	14.5%
<b>Total</b>			<b>56,481</b>	<b>49.79</b>	<b>\$ 2,812,220</b>		<b>\$ 4,685,572</b>	<b>1,873,352</b>	<b>66.6%</b>

Note: Current fixed charges reflect effective charges during the test year.