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Customer Refunds James A: Buson MO PSC Staff Surrebuttal Testimony SR-2013-0016 April 29, 2013

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION

SURREST TPAL TESTIMONY

JANUS A MUNCH

EMECALD POINTE CITLETY COMPANY

CALLE MOR SR 7013-0516

Jeffrecon Clip, Mirrouri April 2524

Staff Exhibition 1 Date 5-9-13 - point 5.8 File NO SR-2013-0016

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Request for an) Increase in Sewer Operating Revenues of) Emerald Pointe Utility Company)

Case No.: SR-2013-0016

AFFIDAVIT OF JAMES A. BUSCH

STATE OF MISSOURI)) ss COUNTY OF COLE)

James A. Busch, of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of $\underline{-7}$ pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

James A. Busch

Subscribed and sworn to before me this <u>29</u>⁴ day of April, 2013.

LAURA BLOCH Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 21, 2015 Commission Number: 11203914

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23	OF
4	JAMES A. BUSCH
6 7	EMERALD POINTE UTILITY COMPANY
8	CASE NO. SR-2013-0016
10 11	
12	Q. Please state your name and business address.
13	A. My name is James A. Busch and my business address is P. O. Box 360,
14	Jefferson City, Missouri 65102.
15	Q. Are you the same James A. Busch who filed direct testimony in this
16	proceeding?
17	A. Yes I am.
18	Q. What is the purpose of your surrebuttal testimony?
19	A. The purpose of my surrebuttal testimony is to respond to testimony filed on
20	behalf of Emerald Pointe Utility Company (Emerald Pointe or Company) witnesses Mr. Gary
21	W. Snadon and Mr. Dale Johansen.
22	I. Executive Summary
23	Q. Please summarize your surrebuttal testimony.
24	A. In my surrebuttal testimony, 1 briefly discuss Mr. Johansen's change in the
25	manner in which the Company proposes to treat the sewage treatment expense from the City
26	of Hollister and I provide further support for Staff's position regarding the Company's over-
27	collection of sewer commodity charges.
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II. Hollister Sewage Treatment Expense

Q. On pages 3 and 4 of his direct testimony, Mr. Johansen acknowledges that Staff used appropriate volumes in calculating sewage treatment expense as originally proposed by the Company. However, the Company now states that it is fearful of large understatement of this expense due to January's wholesale treatment bill from the City of Hollister. Does Staff agree with this last minute change?

- A. No.
- Q. Why?

9 After months of negotiating with the Company regarding this issue, Staff A. finally agreed with a level of expense equal to the Company's original proposal. Now, at the 10 11 eleventh hour, based on one billing month outside the current test year, the Company is trying 12 to increase the amount of this expense. There is no justification for the Company's position 13 that a 20% increase in volumes is an appropriate amount or that there is even an ongoing 14 issue. This could have been a one-month anomaly and is not proper to include in rates at this 15 time, especially since this is outside the current test year for this proceeding. The Company 16 always has the right to request another rate increase to address changes in costs outside of the 17 current test year to make up for any potential shortfall.

18

III. Emerald Pointe's Sewer Commodity Overcharges

Q. On page 6 of Mr. Johansen's testimony and starting on page 5 of Mr. Snadon's
testimony, they both discuss correspondence between Staff and the Company that Mr.
Johansen found through a "work file" and Mr. Snadon says the Company received from Staff.
Do you have any comment regarding the work file and correspondence?

Surrebuttal Testimony of James A. Busch

1 A. Yes. Mr. Johansen reviewed the work file that Staff has concerning Emerald 2 Pointe's previous rate case in 2000. Staff has reviewed that file as well and has also reviewed 3 the correspondence mentioned in Mr. Snadon's testimony. Staff confirms that the 4 information Mr. Johansen and Mr. Snadon discuss is reflective of information that Staff 5 currently has regarding Emerald Pointe's previous rate case. However, Staff cannot confirm if that is a complete and accurate record of all correspondence between Staff and the 6 7 Company. Over the past 12 years, files get moved and employees come and go, so there is no 8 guarantee that what Staff has is complete. Further, it is possible that a substitute tariff could 9 have been filed and no written correspondence was ever created. Any error could have been 10 discussed over the phone or in person.

Q. Since there is no record, at this time, of any correspondence between Staff and the Company explaining the difference between the filed tariff and the document the Company has, please explain Staff's rationale for believing the Company overcharged its customer.

15 According to two documents - the customer notice sent by Emerald Pointe on A. August 13, 1999 (attached as Schedule JAB - S1) and the Agreement Regarding Disposition 16 17 of Small Company Rate Increase Request ("Disposition Agreement" and attached as Schedule 18 JAB - S2) filed in the previous rate case, SR-2000-595, the Company initiated the rate request 19 by asking for an increase of sewer revenues of \$2,500. Staff proceeded to undertake an audit 20 of the Company's books and records. After the audit was complete, the Auditing department 21 would have sent the results to the Water and Sewer Department so that the appropriate rate 22 design could be developed. According to the audit workpapers, an increase greater than the 23 Company's initial request may have been appropriate. However, the prevailing practice at

that time was that the Company could not receive a greater increase than what the Company
 requested. Thus, the total increase in sewer revenues was \$2,500.

Q. Please continue.

4 Α. Based on the agreed upon increase of \$2,500, Water and Sewer Staff 5 developed rates designed to collect the appropriate amount of revenues. Based upon then 6 current revenues plus the increase, total operating revenues were \$35,909. Water and Sewer 7 Staff then looked at the total number of customers for each meter size. Meter sizes for sewer 8 customers were 5/8", 1", and 2". Based on different flow factors for the different sized 9 meters, the analyst can create a meter equivalent to determine the appropriate customer charge 10 for the different size meters. This calculation is the industry standard for determining the 11 appropriate customer charge for different sized customers. Once that number is determined, 12 the annual revenue figure is divided by the number of meter equivalents and then by 12 to 13 determine the monthly customer charge for the smallest meter size. Based on the flow factors 14 described earlier, meter equivalent is multiplied by the flow factor to arrive at the appropriate 15 customer charge per each meter. After these calculations, the 5/8" meter charge was \$13.63, 16 the 1" meter charge was \$34.08, and the 2" meter charge was \$109.06. These charges are the 17 charges reflected in the Company's currently effective tariff.

18

3

Q. Please show this calculation.

A. To make this simpler, I will create a table to show the calculations. As noted,
the total amount of revenue to be collected by the Company was \$35,909.

	Meter Size	Customers	Flow Factor	Meter Equivalents	
	5/8"	108	1	108	
	1"	3	2.5	8	
1	2"	13	8	104	
				220	
	Revenues	\$35,909			
	Meter Equivalents	220			
	Cost per Meter Eq.	\$163.59 (Reve	enues divided by Mete	r Equivalents)	
	Months	12			
	Monthly Cost per Ed	\$13.63 (Cust	omer Charge for small	er Meter)	
	Meter Size	Monthly Cost	Flow Factor	Customer Charge	
	5/8"	\$13.63	1	\$ 13.63	
	1"	\$13.63	2.5	\$ 34.08	
1	2"	\$13.63	8	\$ 109.06	
2	Q. What amou	nt would these c	harges allow the Corr	pany to collect?	
3	A. Multiplying	g the \$13.63 cust	comer charge for 5/8"	customers * 108 customers *	
4	12 months equals \$17,668	.21. Multiplyin	g the \$34.08 custome	or charge for 1" customers * 3	
5	customers * 12 months ea	quals \$1,226.96.	Multiplying the \$1	09.06 customer charge for 2"	
6	customers * 13 customers * 12 months equals \$17,013.81. \$17,668.21 + \$1,226.96 +				
7	\$17,013.81 = \$35,909.				
8	Q. What does this mean?				
9	A. This means	that there was	no commodity rate of	leveloped for Emerald Pointe	
10	for sewer service in its pre	evious rate case.	Attached as Schedul	e JAB - S3 are the Water and	
11	Sewer Staff's workpapers	from that proce	eeding that detail hor	w the appropriate rate design	
12	was developed.			· · · · ·	
13	Q. What else d	loes Schedule JA	B - S2 show?		
14	A. Schedule Ja	AB - S2 shows	the letter that Mr. Sn	adon sent to the Commission	
15	for filing the revised tarif	f sheet associate	ed with the Dispositi	on Agreement as well as the	

Surrebuttal Testimony of James A. Busch

appropriate tariff sheet. The tariff sheet in question, P.S.C. MO. No. 1 1st Revised Sheet No.
 4 shows the agreed upon customer charges, but no commodity charge for sewer service. This
 is the tariff sheet that the Commission approved.

4 Q. Do you have an explanation for the tariff sheets referenced in Mr. Snadon's5 testimony?

A. Yes. If one looks at the water tariff that is currently in effect for the Company, one would note that there is a \$3.50 commodity rate for water usage. A further review shows that the tariff sheet for both water and sewer are almost identical. It is my belief that a typographical error was made when the original tariff sheets were sent out to the Company for review. Once it was noticed, the commodity piece was removed for the sewer system. Unfortunately, this change was then missed by the Company and led to the Company charging the \$3.50 per 1,000 gallon for sewer usage.

Q. Whose responsibility is it to make sure the Company is charging theappropriate rate?

A. It is the Company's responsibility. It is my understanding that the
Commission would send a copy of the actual approved tariff sheet upon the effective date of
any new tariff to the Company. Once the new tariff became effective, it would be stamped
filed, and a copy would be put the official file and another copy sent to the Company.

Q. Starting on page 7 of his testimony, Mr. Johansen discusses the Company's
yearly earnings. In his discussion, he tries to show that the Company, even with the extra
commodity charge, was still under-earning. Does that mean that the Company was not
overcharging its customers?

Surrebuttal Testimony of James A. Busch

A. Not at all. As I discussed briefly earlier, at the time of that earlier rate request, a Company could not be granted an increase greater than what it asked for. Emerald Pointe asked for an increase of \$2,500 in its revenues, and it was granted such. If this amount proved to be too little, the Company should have filed for another rate request. The bottom line is that the effective tariffed rate for Emerald Pointe did not include a commodity charge, and the Company collected one over the past 12 years or more.

7

IV. Recommendation

8 Q. What is Staff's recommendation to the Commission regarding the over-9 collection of sewer commodity charges?

10 A. Staff still recommends that the Commission order the Company to refund over-11 charges, with interest, collected during the five-year period immediately preceding the date 12 when the Company ceased collecting the unapproved commodity rate. Staff recommends that 13 the Company provide bill credits to existing customers who are due refunds over a 45-month 14 period. For any customer who has left the system, Staff recommends that the Company send 15 those former customers a check for the amount of refund owed. For any customer who leaves 16 the system prior to being refunded all amounts owed, the Company should send that customer 17 a check for any remaining un-refunded balance.

18

Q. Does this conclude your surrebuttal testimony?

19 A.

Yes.

Emerald Pointe Utility Company

111 East Main Branson, Missouri 65616 Phone 417-335-8398 Fax 417-546-5772 PECKINER.

p.1

AUG 1 6 1999

WU. FUULIU DERVIUE UUIVIN

August 13, 1999

Dear Customer,

On May 20, 1999 Emerald Pointe Utility Company submitted a request for permanent increases in its current water and sewer rates and an implementation of a late payment charge, under the Missouri Public Service Commission (Commission) small rat increase procedure.

By its request, the Company is seeking an increase in its customer water rates intended to increase its annual operating water service revenues of \$ 2,500.00. It is also requesting an increase in its customer sewer rates intended to generate an increase in its annual operating sewer service revenues of \$ 2,500.00. The Company believes these increases in its operating revenues are necessary to allow it to meet current operating expenses and provide an adequate return on investments.

Set out below is a comparison of the Company's current customer rates and the customer rates it has requested, and the requested addition of a late payment charge. A monthly bill comparison, which is based upon an assumed water usage of 6,000 gallons, is also shown.

	Current Rates	Requested Rates
Water Rates		
Monthly Charge (includes up to 2,000 gallons)	\$ 8.93	\$ 9.82
Water Usage over 2,000 gallons (per 1,000 gallons)	\$ 2.92	\$ 3.21
Total Montly Water Bill (at 6,000 gallons usage)	\$ 20.61	\$22.66
Sewer Rates		
Monthly Charge (based on up to 2,000 gallons of water)	\$16.59	\$18.25

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Usage over 2,000 gallons (per 1,000 gallons) \$ 6.41

(The maximum sewer bill for a residential customer will be for monthly water use representing 8,000 gallons)

Total Monthly Sewer Bill (at 6,000 gallons usage)	\$ 39.91	\$43.89
	Current rates requested n	ates
Late Payment Fees	n/a	10% per month

Beginning sometime soon, The Staff of the Public Service Commission (Commission Staff) will conduct an independent investigation of the books, records, and operations of the Company. Based upon that investigation, the Commission Staff will then make its recommendatious regarding the Company's rate increase requests, and necessary changes to system operations, to the Commission for its consideration.

The Office of the Public Counsel (Public Counsel), a state agency responsible for representing the interests of the consumer before the Commission, may conduct its own investigation, but at a minimum will review the results of the Commission Staff's investigation. The Public Counsel will then make its own recommendations regarding the Company's rate increase requests, and necessary changes to system operations, to the Commission for its consideration.

Any customer who has questions or comments regarding the Company's rate increase requests, or who has experienced recent service problems, should contact the Commission Staff and the Public Counsel within 30 days of the date of this notice. To do so, please use the addresses, telephone numbers, or fax numbers shown below. The Commission Staff and/or the Public Counsel will respond to all such customer contacts, during the course of their investigations.

Missouri Public Service Commission Office of the Po	ablic Counsel
Water and Sewer Department	Attn: Shannon Cook
P.O. Box 360	P.O. Box 7800
Jefferson City, Mo. 65102	Jefferson City, Mo. 65102
Phone: 573/751-3437 or 1-800/392-4211	Phone: 573/751-1304
Fax: 573/751-1847	Fax: 573/751-5562

Upon completion of the Commission Staff's and the Public Counsel's investigations, the Company may be requested to send out a second customer notice regarding the results of the investigations. Additionally, the Public Counsel may request that the Commission hold a local public hearing.

However, neither a second customer notice nor a local public hearing will happen automatically. Therefore, please take the time now to express your views about the Company's rate increase requests, and the operation of its system, to the Commission Staff and the Public Counsel.

Regardless of whether the Company sends out a second notice, or whether a local public hearing is eventually held, no increase in rates will take effect without the approval of the Public Service Commission.

Sincerely

Gary W. Spation President Emerald Pointe Utility Company

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Emerald Pointe Utility Company Corporate Offices 111 East Main Branson, Missouri 65616

March 20, 2000

Mr. Dale Hardy Roberts Secretary to the Commission Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

RE: Emerald Pointe Utility Company Small Company Rate Increase Request Mo. PSC Tariff File No. 9900916 (Sewer)

Dear Mr. Roberts:

. . . .

I am enclosing for filing with the Commission an original and three copies of a revised tariff sheet that includes rate and language changes reflecting an agreement between the Emerald Pointe Utility Company (Company) and the Commission Staff (Staff) on the above subject. The Company initiated the subject rate increase request in May 1999, under the Commission's small company rate increase procedure, and the request was assigned the above-referenced file number.

Additionally, consistent with the Commission's small company rate increase procedure, I am enclosing an <u>Agreement Regarding Disposition of Small Company Rate Increase Request</u> (Agreement). This Agreement reflects a "settlement" between the Company and the Staff regarding all matters related to the Company's sewer service rate increase request.

The Agreement calls for, and the revised tariff sheet contains, customer rates intended to produce an increase of \$2,500 (an approximate 8.7% increase) in the Company's annual operating revenues for its sewer operations. The Agreement also calls for the implementation of a "late payment charge" and of a "bad check charge" of \$15 per insufficient funds check. The Agreement is between the Company and the Staff; therefore, the enclosed tariff sheets bear an effective date that is greater than 45 days from the issue date.

Also, please note that the Company has consented to the extension of the time period beyond 150 days from the date the letter initiation the procedure was filed with the Commission.

,999000916 Schedule JAB S2 Page 1 of 5

FILED

Service Comm

SR-2000-595

It is my understanding that the Staff will be providing additional information about the Company's rate increase request and the related Staff audit and investigation, for filing in the case papers following the creation of a formal docket.

Please contact me at your convenience if you need anything further.

Sincerely, Emeracid Pointe Utelity Company

Gary W. Snadon

President

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enclosures

copies (w/enclosures): Wendell R. Hubbs - PSC Staff Office of the Public Counsel - Shannon Cook

Agreement Regarding Disposition of Small Company Rate Increase Request

, P.,

Emerald Pointe Utility Company

Tariff File No. 9900916 (Sewer)

Emerald Pointe Utility Company (Company) initiated the small company rate increase request (Request) for sewer service that is the subject of the above-referenced Commission "file" through its submittal of letters to the Commission's Executive Secretary. The Company submitted its Request under the provisions of Commission rule 4 CSR 240-2.200, Small Company Rate Increase Procedure (the informal rate case procedure). The dates the Company's letters were received at the Commission's offices were May 24, 1999 and May 25, 1999. In its Request, the Company represented that it was asking for Commission approval of customer rates intended to generate an increase of \$2,500 in its total annual sewer service operating revenues. The Company provides sewer service to approximately 124 customers.

Upon review and acceptance of the Company's Request, the Commission's Records Department assigned Tariff File No. 9900916 to the Request for purposes of identification and tracking. The Records Department then forwarded the Request to the Commission's Water & Sewer Department for processing under the informal rate case procedure.

Pursuant to the provisions of the informal rate case procedure, the Staff of the Commission (Staff) initiated an audit of the Company's books and records and an inspection of the Company's system and the operation thereof.

Based upon the results of the Staff's audit, the Company and the Staff hereby state their agreement that: (1) an increase of \$2,500 (approximately 7.5%) in the Company's annual sewer revenues is reasonable; (2) the implementation of a "late payment charge" is reasonable; and (3) the implementation of a "bad check charge" of \$15 per insufficient fund check is reasonable.

The Company and Staff also agree that the Company will keep their books and records in accordance with the Uniform System of Accounts for

Emerald Pointe Utility Company - File No. 9900916 Sewer Small Company Rate Procedure "Agreement"

7.

<u>Class C and D Sewer Utilities</u> as prescribed by the National Association of Regulatory Utility Commissioners (NARUC), this includes using the Staff's calculation of plant, depreciation reserve and contributions in aide of construction ending balances. The Company also agrees that it will maintain its books and records for their water operations and sewer operations separately.

Additionally, the Company acknowledges that the Staff will file additional information about the details of its audit with the Commission following the creation of a formal docket.

This Agreement is only between the Company and the Staff. However, the Office of the Public Counsel (OPC) has verbally notified the Staff that it does not oppose the increase.

Lastly, the Company and the Staff ask the Commission to note that no action need be taken on the Company's tariff sheet until after the Staff files its formal recommendation for approval of the tariff sheet. That filing will take place soon after filing of this Agreement and the revised tariff sheet.

Other than the specific conditions agreed to by the Company, this agreement is a compromise that has resulted from extensive negotiations between Staff and the Company and no party has agreed to any particular ratemaking principal (except those items specifically stated in this agreement) in arriving at the dollar amount.

This Agreement is effective as of the 10" day of March, 2000. Agreement Signed and Dated:

ador

Mr. Gary Stadon, President Emerald Pointe Utility Company

Dale W. Johansen - Manager Water and Sever Department Public Service Commission Staff

Page 2 of 2 Pages

Emerald PC	oint Utility Com g Company	pany For Mis	Community, Town	
	RENDER	RULES GOVERNI		+
<u></u>		DULE OF SEW		
Availability: Avail	*	r located in the Comp		service territory.
Monthly Cus	tomer Charge (serve	ed by a 5/8" water me ed by a 1"water meter ed by a 2" water mete	\$34.08	per Month + per Month + per Month +
Billi bearing the la which the pa \$3.00 or two	ast date on which pa yment is considered	d distributed at month ayment will then be co delinquent is 21 days onth times the unpaid	onsidered delinques after rendition of	nt. The period after the bill. A charge
Bad Check A ba	Charge: *	15 per check will be p	paid on all checks r	eturned from the

.

Small Company Rate Filing - Sewer Service File # 9900916

	ing Incon	ne Statement	
	As Adjusted		
Revenue	\$33,409		
			Cost of Service
Expenses			
Salaries & Wages	\$2 39		\$239
Rents	\$400		\$400
Purchased Power	\$6,519		\$6,519
Chemicals	\$1,364		\$1,364
Misc. Supplies & Expenses	\$16	•	\$16
Watewater Testing (Sup.& Eng.)	Sec. 3360		\$360
Maint of Pumping Equip.	\$75		\$75
Maint of Treatment & Disposal	\$67		\$67
Maint of Other Plant	\$226		\$226
Outside Services	\$248		\$248
Insurance Expense	\$603		\$603
Regulatory Commission Expense	\$1,087		\$1,087
Transportation Expenses	\$867		\$867
Postage Expenses	\$234		\$234
Telephone Expenses	\$598		\$598
Salaries & Wages	\$8,574		\$8,574
Payroll Taxes	\$656		\$656
Office supplies & Exp.	\$468		\$468
x			
Operation & Maintenance Expenses	\$22 ,601		\$22,601
	\$0		
Operation & Maintenance Expenses			\$22,601
Earnings over O&M Exp	\$10,808		
Total COS Allowed	\$35,909		\$35,909
Increase Allowed	\$2,500	7.5%	

January 12, 2000

Missouri Public Service Commission Staff

Page 1 of 5 W. R. Hubbs

S-1 (A)

Schedule JAB S3 Page 1 of 5

Small Company Rate Filing - Sewer Service File # 9900916

S-1 (A)

Sewer Rate Development

Sewer Rate	
Total Sewer Cost of Service	\$35,909
Divided by Meter Equivalents	220
Equals: Cost per Meter Equivalent	\$163.59
Divided by 12 months/year	\$12.00
Equals: Monthly Cost per Equivalent	\$13.63

Meter		Flow	Meter
Size	Customer	Factor	Equivalents
5/8"	108	1	108
1"	3	2.5	8
2"	13	8.0	104
Totals	(124)		220

Meter	Cost per Meter	Flow _	Ř	ate per
Size	Equivalent	Factor	M	eter Size
5/8"	\$13.63	1	\$	13.63
1"	\$13.63	2.5	\$	34.08
2"	\$13.63	8.0	\$	109.06

January 12, 2000

Missouri Public Service Commission Staff

Page 2 of 5 W. R. Hubbs

Small Company Rate Filing - Sewer Service File # 9900916

Residential Sewer Customer Impact Monthly Scharge Proposed Rates \$13.63 Current Rates \$39.91 Difference -\$26.28 Percentage Difference \$39.91

mirom Cuntent Rates

January 12, 2000 Missouri Public Service Commission Staff Page 3 of 5 W. R. Hubbs

65,84%

S-1 (A)

Schedule JAB S3 Page 3 of 5

Small Company Rate Filing - Sewer Service File # 9900916

Proposed Charges

Annualized & Normalized Revenues

Sewer Revenues

Customer Numbers -5/8" meter	108
Customer Bills	1290
Times:	
Proposed Monthly Sewer Charge	\$ 13.63
Equals:	· · · · · · · · · · · · · · · · · · ·
Revenues 5/8 " Meter Service	\$17,668.18
Customer Numbers - 1" meter	
Customer Bills	36
Times:	
Proposed Monthly Sewer Charge	\$ 34.08
Equals:	
Revenues 1 "Meter Service	\$1,226.96
Customer Numbers - 2" meter	13
Customer Bills	150
Times:	
Proposed Monthly Sewer Charge	\$ 109.06
Equals:	
Revenues 2 "Meter Service	\$17,013.81

Total-Sewer Rate Revenues

January 12, 2000 Missouri Public Service Commission Staff Page 4 of 5 W. R. Hubbs

S-1 (A)

\$35,909

Small Company Rate Filing - Sewer Service File # 9900916

S-1 (A)

Accounting Department

Test Year Annualized & Normalized Revenues

Sewer-Revenues

Minimum Bill Revenues

Customer Number	124
Customer Bills	1488
Times:	**************************************
Existing Minimum Monthly Charge	\$16.59
Equals:	
Annualized Minimum Bill Revenue	\$24,686

Commodity Charge Revenues

Total Gallons Used	6,737,784
Base Gallons Included in Minimum	1,629,723
Gallons over 8,000 per customer per month	3,611,830
Gallons Billed*	1,496,231
Times:	
Existing Commodity Charge	\$5.83
Equals;	
Annualized Commodity Charge Revenue	\$8,723

Total Sewer Rate Revenues

January 12, 2000

Missouri Public Service Commission Staff

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\$33,409

Schedule JAB S3 Page 5 of 5