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APPLICATION OF NORTHTOWN
ACRES WATER SUPPLY FOR
AUTHORITY TO CHANGE RATES

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY OF

SHEROLL RICHARDSON

ON BEHALF OF

NORTHTOWN ACRES WATER SUPPLY

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1 **I. EXECUTIVE SUMMARY**

2 Northtown Acres has not had an increase to its base rates in over a decade. The major
3 cost drivers for Northtown Acres are the cost of purchasing water from the City of Corsicana;
4 operating labor, maintenance labor, and administrative labor expense; and the return on and
5 depreciation of the water system. These three groups of costs make up 82% of Northtown
6 Acres' cost of service .

7 The current interim rates generate \$162,795 annually, ***an under-recovery of \$129,630.***
8 Thus, Northtown Acres is not earning sufficient revenues to cover its reasonable expenses,
9 much less earn a return.

10 Northtown Acres' cost of service has been steadily increasing over the last decade, with
11 little to no corresponding increase in revenues. The purpose of this case is to bring the rates
12 of Northtown Acres into compliance with state law as being sufficient to recover a reasonable
13 return on invested capital used and useful in excess of the reasonable expenses incurred in
14 providing service.

1 **II. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.**

3 A. My name is Sheroll Richardson. I, along with my husband Roger, own, operate and
4 manage Northtown Acres Water Supply ("Northtown Acres"). My business address is
5 18770 FM 709 North, Dawson Texas 76639.

6 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.**

7 A. I have worked for Northtown Acres for more than 30 years.

8 **Q. PLEASE DESCRIBE NORTHTOWN ACRES.**

9 A. Northtown Acres is a small, family-owned Class D water utility that has been serving its
10 approximate 150 to 211 customers in the outskirts of Corsicana, Texas, since the 1970s.

11 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY TO THE PUBLIC**
12 **UTILITY COMMISSION OF TEXAS ("PUCT" OR "COMMISSION")?**

13 A. I have not.

14 **III. PURPOSE OF TESTIMONY**

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

16 A. The purpose of my testimony is to support Northtown Acres' amended application for
17 authority to change rates.

18 **Q. WHAT IS THE BASIS OF THE NEED FOR A RATE INCREASE?**

19 A. Northtown Acres has not had an increase to its base rates in over a decade. The major cost
20 drivers for Northtown Acres are the cost of purchasing water from the City of Corsicana;
21 operating labor, maintenance labor, and administrative labor expense; and the return on
22 and depreciation of the water system. These three groups of costs make up 82% of
23 Northtown Acres' cost of service as set out below:

1
2

Three Major Cost Categories		
	Cost	% of Cost of Service
Revenue Requirement	\$296,017	100%
Purchased Water	\$95,302	32%
Labor	\$78,000	26%
Return on/of Investment	\$68,279	23%
Total of Three Major Cost Categories	\$241,581	82%

3

4

The current interim rates generate \$162,795 annually, *an under-recovery of \$129,630.*

5

Thus, Northtown Acres is not earning sufficient revenues to cover its reasonable expenses,

6

much less earn a return.

7

Northtown Acres' cost of service has been steadily increasing over the last decade,

8

with little to no corresponding increase in revenues.

9 **Q. HOW IS YOUR TESTIMONY ORGANIZED?**

10 A.

My testimony generally follows the order of issues required in the rate filing package.

11

Those issues are revenue requirement, expenses, invested capital, and rate design. I will

12

also address purchased water expense and a pass through for purchased water expense.

13

Finally, I will address rate case expenses for this proceeding.

14 **IV. THE REVENUE REQUIREMENT**

15 **Q. WHAT IS NORTHTOWN ACRES TOTAL REVENUE REQUIREMENT?**

16 A.

Northtown Acres' total annual revenue requirement is \$296,017. The total annual

17

requirement is netted against other revenues of \$3,592, to determine the revenues needed

1 to be collected through rates, or 292,425, which includes \$95,302 in purchased water
2 expense.

3 **Q. WHAT ARE THE VARIOUS COMPONENTS OF THE REVENUE**
4 **REQUIREMENT?**

5 A. The various components of the revenue requirement are summarized in Schedule I-1 of the
6 amended rate filing package. They consist of adjusted test year levels of operating
7 expenses, depreciation expense, taxes, and return on investment. I will address each
8 component of the revenue requirement in turn.

9 **V. OPERATING EXPENSE**

10 **Q. WHAT IS THE ADJUSTED TEST YEAR LEVEL OF OPERATING EXPENSE**
11 **REQUESTED FOR RECOVERY?**

12 A. Northtown Acres' total adjusted test year operating expense is set forth on Schedule I-1,
13 line 21, column F. The two cost drivers of Northtown acres' operating expense are the
14 costs of purchased water and contract work.

15 **Q. HOW IS THE COST OF PURCHASED WATER DETERMINED?**

16 A. The cost of purchased water makes up almost half of the operating expense of the utility.
17 Northtown Acres purchases 100% of its water from the City of Corsicana. Northtown
18 Acres used the actual 2019 purchased water expense incurred as the cost of purchased
19 water to be recovered through rates. Northtown Acres purchased water expense is
20 provided in Schedule I-1, line 1, column F in the amended rate filing package.

21 The recovery of purchased water expense is discussed further in the rate design
22 testimony below.

1 **Q. WHAT STEPS DOES NORTHTOWN ACRES TAKE TO MANAGE THE COST**
2 **OF PURCHASED WATER?**

3 A. Because the cost of purchased water is such a large component of customer bills, we are
4 very active in monitoring usage to detect potential leaks on the system and promptly
5 repairing the leaks to avoid excessive purchased water expense. As a result of our
6 activities, Northtown Acres water loss is less than 7.5%, which I understand is less than
7 half of what has traditionally been acceptable levels of water loss. The savings to North
8 Town Acres' customers resulting from these efforts as compared to a utility with 15%
9 water loss is approximately \$7,147 annually.

10 **Q. HOW IS THE COST OF CONTRACT WORK DETERMINED?**

11 A. Northtown Acres, like any utility or business enterprise, incurs labor expense for
12 operations, maintenance and administrative activities. Northtown Acres' water operator is
13 Roger Richardson, who holds a Class D water operator license. Both Mr. Richardson and
14 and I have performed the needed operations, maintenance, and repairs on the system for
15 the last decade or more. Currently, we are also in need of the assistance of a part time
16 construction and maintenance contract worker to assist in performing routine maintenance,
17 repairs, and construction on the system as it ages.

18 Currently, I perform the administrative functions of the utility including the billing
19 and bookkeeping. We are also in need of the assistance of a part time contract accountant
20 to help develop a capitalization plan for the utility and a method of recording and maintain
21 the books for ongoing capital improvements on the system. As will be discussed later in
22 the testimony, there are neither records of the original costs of the system nor the ongoing
23 capital improvements of the system. As such, we have retained assistance in performing a

1 trending analysis to determine the original costs of the system. However, the trending
2 analysis does not include the ongoing capital improvements made in the system over the
3 years. Thus, as the system is on the back end of the depreciable investment life, a large
4 quantity of the ongoing capital improvements are not reflected in the capital investment
5 used in setting rates. A part time contract accountant is necessary to ensure that ongoing
6 capital expenditures, post-test year, are properly recorded and included in invested capital
7 for future rate recovery for the financial integrity of the utility.

8 Northtown Acres' current rates do not recover sufficient revenues to pay *any* labor
9 expense. As may be seen in Schedule I-1, Line 7, no test year contract or employee labor
10 was paid. To date, Roger Richardson and I have been operating and maintaining the water
11 system, as well as fulfilling the administrative roles of the utility without pay for our time
12 and efforts. Thus, the ongoing operating labor, maintenance labor, and administrative labor
13 are requested as a known and measurable adjustment to test year expenses. Northtown
14 Acres is requesting a known and measurable change in expense from \$0 to \$78,000 to
15 cover expenses for Roger Richardson and me who have been for the past 20 years operating
16 and maintaining the system and fulfilling the administrative roles of the utility. We also
17 need, and with a revenue increase plan on hiring, part time contractors to assist in the
18 maintenance of the utility as the facilities are ageing. We are also planning on hiring, with
19 an increase in revenues, a part time contract accountant to assist with the administrative
20 accounting of expense and to ensure the proper recordation of ongoing utility investment,
21 which has not been properly accounted for and will not be recovered otherwise, as will be
22 explained below.

1 Northtown Acres is providing workpapers to Schedule I-1 supporting the
2 reasonableness of its requested expenses for these four positions. The Highly Confidential
3 workpapers identify the annual expense for similar contact labor for a similarly sized
4 utility in the same geographic region as Northtown Acres. In order to be competitive,
5 Northtown Acres must be able to provide at least a comparable level of compensation.

6 **Q. ARE THERE ANY OTHER OPERATING EXPENSES FOR WHICH**
7 **NORTHTOWN ACRES IS REQUESTING A KNOWN AND MEASURABLE**
8 **CHANGE?**

9 A. Yes. For annual regulatory expenses, Northtown Acres is requesting a total adjusted test
10 year amount of \$5,202, which includes a known and measurable increase to test year
11 expense of \$4,000. The annual regulatory expenses are anticipated to increase once final
12 rates are set and Northtown Acres may be able to take advantage of streamlined rate filings
13 including Class D rate adjustments and purchased water pass through adjustments.
14 Because Northtown Acres has yet to be able to take advantage of these rate adjustment
15 mechanism, Northtown Acres does not have historical expenses levels and estimated the
16 expense levels necessary to recover the costs of these filings based on past regulatory
17 expense incurred. Northtown Acres has provided in workpapers the back-up support used
18 as the basis of its estimate.

19 **Q. WHAT ARE THE REMAINING EXPENSES INCLUDED IN OPERATING**
20 **EXPENSE AND HOW WERE THEY CALCULATED?**

21 A. The remaining expenses sought for inclusion in rates are materials and supplies,
22 transportation expenses, office services and rentals, office supplies and expenses,
23 insurance, lab work and testing and other regulatory expenses. These expenses are all

1 reasonable and based on test year expense levels and the supporting documentation is
2 provided in workpapers to Schedule I-1.

3 **Q. WHAT LEVEL OF DEPRECIATION EXPENSE IS BEING REQUESTED?**

4 A. Northtown Acres requests the depreciation expense calculated in accordance with the
5 formula in the rate filing package for its requested invested capital used and useful in
6 providing service. The depreciation expense is calculated on Schedule III-3. The known
7 and measurable adjustments to the test year level of depreciation expense are attributable
8 to the including in invested capital of the original costs of the water distribution system,
9 which was previously left out of the rate filing package and is addressed in more detail
10 below.

11 **Q. WHAT ARE NORTHTOWN ACRES' TAXES OTHER THAN INCOME TAXES?**

12 A. Northtown Acres' taxes other than income taxes are calculated on Schedule IV-2 and are
13 representative of the grossed-up revenue related taxes that would be incurred at the
14 adjusted test year level of revenues.

15 **Q. WHAT ARE THE FEDERAL INCOME TAXES AND HOW ARE THEY**
16 **CALCULATED?**

17 A. Northtown Acres' Federal Income Taxes are calculated on Schedule V based on the
18 Commission's return method of calculating federal income taxes using a corporate rate of
19 return of 21%. In the event that the Corporate Federal income tax rate were to be increased
20 during the pendency of this case, Northtown Acres requests that the calculation of Federal
21 income taxes reflect the increased corporate tax rate.

1 **VI. INVESTED CAPITAL**

2 **Q. WHAT IS NORTHTOWN ACRE'S REQUESTED TEST-YEAR-END INVESTED**
3 **CAPITAL?**

4 A. Northtown Acres' requested test-year-end invested capital includes gross investment of
5 \$985,276, accumulated depreciation of \$590,816, for a net investment of \$364,459.
6 Northtown Acres' Invested capital is detailed on Schedule III-3 of the rate filing package
7 and the supporting documentation is provided in workpapers to Schedule III-3. The
8 original cost of the distribution system is based on a trending analysis, as permitted by the
9 Commission's rules when the historical cost of investment is unavailable. All other
10 investment is supported by records of actual cost.

11 **Q. WHY IS THE ORIGINAL COST OF THE DISTRIBUTION SYSTEM BASED ON**
12 **A TRENDING STUDY?**

13 A. Utilities are permitted to recover a return on and depreciation of the original cost of
14 invested capital in order to recover its costs and be positioned to invest for its future. The
15 financial integrity of a utility depends on the ability to recover its capital costs and a
16 reasonable return. Where the original cost records are not available for a utility, the rules
17 permit a trending analysis to be used to calculate the original cost of the system at the time
18 it was placed in service. Northtown Acres contracted for a trending analysis to be
19 performed in this case and has provided the analysis as a workpaper to Schedule III-3.

20 **Q. WHY IS A TRENDING ANALYSIS REQUIRED IN THIS CASE?**

21 A. Northtown Acres financial records do not contain the original cost of invested capital. The
22 water utility was originally established by my father, Herb Madison, in the 1970's. Mr.
23 Richardson and I have been operating the water utility for many decades and performed

1 much of the original trenching and assisted in the construction of the system. When my
2 father passed away, I inherited the water utility without any records of original costs of the
3 utility investment and had to rely on the trending study to provide the original cost.

4 **Q. DOES THE TRENDING STUDY PROVIDE AN ACCURATE AMOUNT FOR THE**
5 **ORIGINAL COST AND INVESTED CAPITAL IN THE DISTRIBUTION**
6 **SYSTEM?**

7 A. Yes, for original cost. Based on my experience in the cost of materials and labor involved,
8 as well as my knowledge of the Northtown Acres' water system and its development over
9 the years, the trending study provides an accurate amount for the original cost of the
10 system. However, the invested capital, based on the trended original cost of investment is
11 very conservative in favor of customers as it does not include any of the annual capital
12 improvements made over the several decades that the system has been in service. In order
13 to limit the amount of issues in this case, we have limited the requested recovery to the
14 original cost of the distribution system as calculated in the trending study and request that
15 the Commission recognize that the amount requested is more than reasonable given that
16 much of the investment is near the end of its depreciable life and contains multiple capital
17 improvements over the years that are not reflected in the cost of service.

18 **Q. GOING FORWARD, HOW DOES NORTHTOWN ACRES PROPOSE TO**
19 **ACCOUNT FOR THE INVESTED CAPITAL AND ONGOING CAPITAL**
20 **IMPROVEMENTS NECESSARY TO MAINTAIN AND REPLACE THE WATER**
21 **SYSTEM?**

22 A. Northtown Acres requests that the Commission determine the reasonable and necessary
23 and used and useful invested capital in this case as the amounts included in Schedule III-

1 3. As stated above, Northtown Acres is also requesting an increase in operating expense
2 to be able to retain a part time contract accountant to assist with developing a capitalization
3 policy and ensuring that any capital investments or improvements incurred subsequent to
4 the test-year-end are properly recorded and included in rate base to be requested for
5 recovery in future rate cases.

6 **VII. COST OF CAPITAL**

7 **Q. WHAT IS NORTHTOWN ACRE'S REQUESTED COST OF CAPITAL?**

8 A. Northtown Acres' requests an overall cost of capital of 9.04% based on a proposed
9 regulatory capital structure of 40% debt and 60% equity, a cost of debt of 5.04%, and a
10 cost of equity of 11.71%. Northtown Acres' requested cost of capital is calculated on
11 Schedule III-1.

12 **Q. WHAT IS THE BASIS FOR NORTHTOWN ACRES' PROPOSED OVERALL**
13 **COST OF CAPITAL?**

14 A. Northtown Acres' proposed overall cost of capital is based in large part on the real-world
15 risks of small water utilities such as Northtown Acres and on Commission precedent.

16 **Q. WHAT IS THE BASIS FOR THE REQUESTED CAPITAL STRUCTURE?**

17 A. Northtown Acres' actual capital structure is consistently 100% equity, excluding short term
18 debt. As a small utility, Northtown Acres incurs a great deal of business and regulatory
19 risk in providing service to its customers. With the regulatory cost involved in increasing
20 rates, any needed increase in revenues could easily be outpaced from the customers'
21 perspective just for the incurrence of rate case expenses. And, as borne out by this
22 proceeding alone, any needed increase in rates may take multiple years to realize. For
23 multiple years, Northtown Acres has been unable to recover a reasonable level of expense,

1 much less any return on investment. If Northtown Acres had any material level of debt, it
2 would be in risk of default given the degree of revenue shortfall and the time in which it
3 takes to adjust rates. Under these operating conditions, in my opinion, a small utility could
4 not survive with any material level of debt. In my opinion, the capital structure of
5 Northtown Acres should be the actual capital structure of 100% equity to reflect the risk
6 involved in operating and the recovery of revenues. The requested regulatory capital
7 structure of 40% debt is requested solely to comply with the rate filing package requirement
8 that seems to state that debt may not be less than 40% of the capital structure.

9 **Q. WHAT IS THE BASIS FOR THE REQUESTED COST OF DEBT?**

10 A. As previously stated, Northtown Acres does not have long-term debt. Northtown Acres'
11 proposed cost of debt is based the industry cost of debt recommended by Staff and
12 approved by the Commission in recent water utility cases.

13 **Q. WHAT IS THE BASIS FOR THE REQUESTED RETURN ON EQUITY?**

14 A. The requested return on equity was not updated in the amended application and still reflects
15 the rate of return calculated according to the method accepted by the rate filing package in
16 effect when this case was originally filed. I understand that the cost of equity is a subjective
17 issue. As such, Northtown Acres' requests that the cost of equity originally requested and
18 supported by the then effective rate filing package be approved in recognition of the
19 business and regulatory risk of the utility as described above with respect to the capital
20 structure. In the alternative, if the cost of equity contemplated by the original rate filing
21 package instructions is not approved to account for Northtown Acres' business and
22 regulatory risks, Northtown Acres requests that the capital structure contemplated by the
23 rate filing package instructions also be modified so that Northtown Acres may recover the

1 cost of capital based on its actual capital structure and risk profile. Northtown Acres also
2 specifically reserves the right to provide expert testimony on cost of capital in the event
3 any party seeks to contest the issue.

4 **VIII. RATE DESIGN**

5 **Q. WHAT IS NORTHTOWN ACRES PROPOSING FOR RATE DESIGN?**

6 A. Northtown Acres' proposed rate design is provided in Schedule VI-2. The rate design is
7 accomplished by setting the customer charge for a 5/8" meter at \$35.00. The customer
8 charges for larger meters are increased by a set factor depending on the size of the meter.
9 The remaining revenues not recovered through the customer charges are recovered through
10 volumetric rates. Schedule VI-1 is provided only to show the allocation of costs to fixed
11 and variable under a traditional allocation method.

12 **Q. WHY DID YOU CHOOSE THIS ALLOCATION METHOD?**

13 A. In my experience, the customers prefer a lower fixed customer charge. If the cost allocation
14 between fixed and variable charges shown in Schedule VI-1 were reflected in rates in
15 Schedule VI-2, the customer charge would be much higher.

16 **IX. PURCHASED WATER PASS THROUGH**

17 **Q. PLEASE SUMMARIZE YOUR DIRECT TESTIMONY.**

18 A. Purchased water expense is, by far, the largest expense of Northtown Acres. Northtown
19 Acres purchases its water from the City of Corsicana and delivers it to its customers on the
20 Northtown Acres water system. Northtown Acres proposes to include the purchased water
21 costs in base rates.

22 In order to permit Northtown Acres to expeditiously file and recover increases in
23 the cost of purchased water, Northtown Acres proposes that the below pass-through

formula be approved and included in its tariff. Northtown Acres proposes a simplified pass through formula that is similar to multiple approved formulas and the formula Northtown Acres is accustomed to using. The initial pass through rate would be \$0. The proposed formula would permit Northtown Acres to request a pass-through surcharge *solely for the incremental increase in rates charged by the City of Corsicana in its third-tier rate*, which is currently \$4.15 per 1000 gallons. Northtown Acres proposed pass through formula is set out below:

Proposed Pass Through Calculation			
	Description	Constant	Variable
1	Corsicana Tier 3 Volumetric Rate 2019	\$4.15	
2	Corsicana Tier 3 Volumetric Rate 20XX	\$X	Yes
3	Incremental Rate (Line 2 - Line 1)	Calculated	
4	20XX Line Loss %	Y%	
5	Pass Through Rate	Calculated	
Line 5= Line 3 * (1/(1- Line 4))			

Where line losses are calculated as follows:

Pass Through Line Loss Calculation			
	Description	Constant	Variable
1	Corsicana Volumes Purchased 20XX	XX gallons	Yes
2	Volumes Built into Base Rates	600,000	
3	Adj'd Purchased Volumes (Ln. 1- Ln. 2)	Calculated	
4	Northtown Metered Volumes 20XX	YY gallons	Yes
5	20XX Line Loss Volumes (Line	Calculated	
6	Northtown Metered Volumes 20XX	Y% Calculated	

1
2 If Corsicana were to raise its third tier rates today to go into effect next month,
3 Northtown Acres pass through rate would be calculated using 1) the new tier 3 rate
4 approved by the City of Corsicana, 2) the annual volumes purchased from the City of
5 Corsicana for the last year, and 3) the volumes sold by Northtown Acres to customers for
6 the last year.

7 Northtown Acres has been in discussions with Commission Staff, who may have a
8 different recommendation on the pass-through formula. Northtown Acres proposes the
9 above formula as the most effective at the least administrative expense to implement, for
10 the benefit of both Northtown Acres and its customers. Northtown Acres has also provided
11 a schedule calculating the pass through consistent with Staff's proposal. Both proposals
12 were included within the notice provided in this case.

13 **Q. DOES ONE METHOD OF RECOVERY RESULT IN GREATER RATES OR**
14 **REVENUES FOR NORTHTOWN ACRES?**

15 A. No. Both methods of rate recovery produce the same rates for customers. The only
16 difference will be that one requires a separate surcharge while the other is built into the
17 volumetric rates.

1
2 **X. RATE CASE EXPENSES**

3 **Q. IS NORTHTOWN ACRES PROPOSING THE RECOVERY OF RATE CASE**
4 **EXPENSES IN THIS PROCEEDING?**

5 A. Yes. Northtown Acres requests that the Commission approve the reasonable rate case
6 expenses incurred by Northtown Acres in this proceeding. Northtown Acres has made
7 every attempt to maintain rate case expenses at a minimum, for the benefit of its customers,
8 and is not seeking recovery of hourly attorney's fees. Northtown Acres is seeking recovery
9 of expenses and contract work incurred in the processing of this case. Northtown Acres
10 will provide updated rate case expense data with rebuttal testimony or in subsequent filings.

11 **Q. HOW DO YOU PROPOSE THAT NORTHTOWN ACRES RECOVER THE RATE**
12 **CASE EXPENSES INCURRED?**

13 A. Rate case expenses incurred for this proceeding should be recovered through a surcharge
14 to customers in addition to the proposed base charge, volumetric rates, and pass through.
15 The recovery of rate case expenses incurred in this proceeding should be incremental to
16 the known and measurable annual regulatory expense requested for recovery through rates
17 as they are the expenses that are apt to prevail into the future, whereas the amount of rate
18 case expenses to be included in the surcharge are the expenses actually on a historical basis,
19 which are not recovered through rates.

20 **X. CONCLUSION**

21 **Q. PLEASE SUMMARIZE YOUR DIRECT TESTIMONY.**

22 A. Northtown Acres requests a rate increase to cover the increases in the cost of service
23 incurred over the last decade. Specifically, Northtown Acres requests:

- Approval of its operating expenses, including contract labor expenses, which Northtown acres has not been able to pay;
- Approval of Northtown Acres' proposed depreciation and tax expense;
- A rate base determination of its invested capital used and useful in providing service;
- Approval of Northtown Acres proposed cost allocation and rate design including the purchased water pass-through; and
- Recovery of reasonable rate case expenses.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does.

AFFIDAVIT

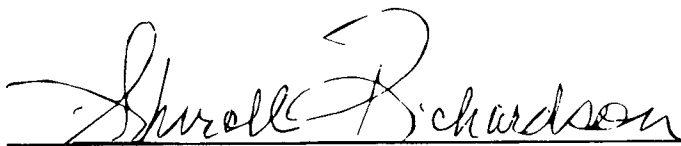
STATE OF Texas §

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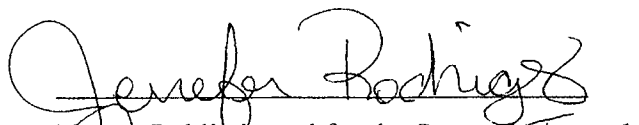
COUNTY OF Navarro §

BEFORE ME, the undersigned notary public, this day personally appeared Sheroll Richardson to me known, who being duly sworn according to law, deposes and says:

“My name is Sheroll Richardson. I am of legal age and a resident of the State of Texas. I certify that the foregoing testimony and exhibits are true and correct to the best of my knowledge and belief.”


Sheroll Richardson

Subscribed and sworn to before me, notary public, on this the 12 day of May, 2021.


Notary Public in and for the State of Texas

My Commission expires: 07-30-2024

