



Control Number: 50200



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SOAH DOCKET NO. 473-20-3110.WS
PUC DOCKET NO. 50200

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PUBLIC UTILITY COMMISSION
FILED ONLINE

APPLICATION OF UNDINE TEXAS, § BEFORE THE STATE OFFICE
LLC AND UNDINE TEXAS § OF
ENVIRONMENTAL, LLC FOR §
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

UNDINE TEXAS, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC'S SECOND SUPPLEMENTAL RESPONSE TO OPUC'S SECOND REQUEST FOR INFORMATION

Undine Texas, LLC and Undine Texas Environmental, LLC (together, Undine) file this Second Supplemental Response to the Second Request for Information (RFI) filed by the Office of Public Utility Counsel (OPUC). Pursuant to 16 Tex. Admin. Code (TAC) § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

If a responsive document exceeds 99 pages, the response will indicate that the attachment is voluminous. Voluminous documents will be provided electronically, and pursuant to 16 TAC § 22.144(h)(2), the document will be made available for inspection at the offices of Undine's attorneys, Lloyd Gosselink Rochelle and Townsend, P.C., located at 816 Congress Avenue, Suite 1900, Austin, Texas 78701. Please call Hanna Campbell at 512-322-5871 during regular business hours, to make an appointment to review the documents.

Pursuant to 16 TAC § 22.144(h)(4), an index of the voluminous documents is provided, below.

VOLUMINOUS INDEX

1. Attachments to Undine's Second Supplemental Response to OPUC's Second RFI

No.	Date	Title or Description	Preparer or Sponsor	Page Range	No. of Pages
2-5a	05/01/2020	Attachment OPUC 2-5(a) (Undine's original rate application schedules less Beechwood lawsuit)	Prepared by: Benny Wilkinson; Sponsored by: Edward R. Wallace, Sr.	1-109	109

1962

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
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ATTORNEYS FOR UNDINE TEXAS, LLC AND
UNDINE TEXAS ENVIRONMENTAL, LLC

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on May 1, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.



GEORGIA N. CRUMP

SOAH DOCKET NO. 473-20-3110.WS

DOCKET NO. 50200

UNDINE TEXAS, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC'S SECOND SUPPLEMENTAL RESPONSE TO OPUC'S SECOND REQUEST FOR INFORMATION

OPUC 2-5 Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 833.1 – Beechwood Lawsuit. Please provide a narrative description of the merits of this dispute and the ultimate outcome of the proceeding if concluded. Please provide the names of the parties to the lawsuit, the cause number, a citation to the case or applicable PUC Docket number.

SECOND SUPPLEMENTAL RESPONSE: Undine has removed the request to recover costs related to the Beechwood Lawsuit from this rate filing. This adjustment reduces expenses by \$71,773.25. See Attachment OPUC 2-5(a), being provided in electronic file-format on CD, and Attachment OPUC 2-5(b) for the impacts of the removal of these costs to Undine's overall request.

The impact on the base rate is:

Original Filing: \$58.30
Revised Filing: \$57.75

The impact on tiered water rates is as follows:

Tier	Original Filing	Revised Costs
0-6,000	\$2.80	\$2.78
6,001-15,000	\$3.87	\$3.80
15,001-25,000	\$6.55	\$6.51
25,000+	\$9.50	\$9.50

The impact on the flat sewer rate is:

Original Filing: \$131.65
Revised Filing: \$130.98

Prepared by: Benny Wilkinson
Sponsored by: Edward R. Wallace, Sr.

New

SCHEDULES - CLASS B RATE/TARIFF CHANGE I-1 REVENUE REQUIREMENT SUMMARY - WATER	UTILITY NAME <u>Undine Texas LLC</u>
PUCT Docket No. 50200	Test Year End 9/30/2019

A		B		C					D	E	F=D+E	G	
Asst. No.		ORBIT WATER CONSUMERS SUBURBAN COMMUNITY GULF COAST WATER CHUCK BELL					Historical	K & M	Adjusted				
							Test Year	Changes*	Test Year				
Line	Water	Sewer	Account Name								Reference / Instructions		
1	610	710	Purchased water/sewer treatment		17,479		12,715		6,892	37,086	(26,527)	10,559	1
2			Sludge Removal Expense							-	-	-	2
3	615 1	715 1	Power Expense-production only	57,580	43,163	33,662	6,411	11,550	21,048	173,413	23,212	196,625	3
4	618	718	expenses	44,677	17,769	20,493	4,948	289	3,386	91,562	5,632	97,194	4
5	601 1	701 1	Employee labor							-	-	-	5
6	620	720	Materials	4,691	3,706	2,176	173	676	1,053	12,475	1,162	13,637	6
7	631-642	731-736	Contract work	645,044	520,808	390,984	69,348	135,761	88,521	1,850,466	41,714	1,892,180	7
8	650	750	Transportation expenses							-	-	-	8
9	664	764	Other plant maintenance							-	-	-	9
10	601 2	702 2	Office salaries							-	-	-	10
11	603	703	Mgmt salaries							-	-	-	11
12	604	704	Employee pensions & benefits							-	-	-	12
13	615 2	715 2	Purchased power-Office only							-	-	-	13
14	670	770	Bad debt expense	17,076	69,381	11,345	4,482	1,492	728	104,504	(54,859)	49,645	14
15	676	776	Office services & rentals							-	35,154	35,154	15
16	677	777	Office supplies & expenses							-	-	-	16
17	678	778	Professional services							-	-	-	17
18	684	756-759	Insurance	17,199	16,347	12,811	2,083	3,533	8,414	60,388	(1,180)	59,208	18
19	667	767	Regulatory expense (other)	16,891	74,512	30,705	5,976	2,616	1,797	132,496	(89,677)	42,819	19
20	675	775	Miscellaneous expenses	29,872	24,903	14,624	4,949	5,774	2,245	82,369	1,796,097	1,878,466	20
21			Total operating Expenses	833,030	788,068	516,800	111,084	161,690	134,084	2,544,758	1,730,729	4,275,487	Add Lines 1-20
22	403		Depreciation	248,815	65,820	69,282	46,029	47,295	30,344	507,586	56,320	563,906	Schedule III-3, Column F, Line 32
23	408		Taxes Other than Income	15,556	19,625	12,390	2,189	2,510	1,893	54,163	263,645	317,807	Schedule IV-2, Column F, Line 8
24	409/10		Income Tax Expense							-	188,589	188,589	Schedule V-1, Column C, Line 6
25			TOTAL EXPENSES	1,097,401	873,514	598,472	159,302	211,496	166,321	3,106,506	2,239,283	5,345,790	Add Lines 21-24
26			TOTAL HISTORIC REVENUE	3,162,408	867,485	647,408	133,734	183,734	163,334	3,162,977			Schedule I-2(a), Line 6
27			RETURN	100,105	(6,319)	(72,705)	(37,907)	90,224	(16,927)	56,471			Line 26 less Line 25
28			REQUESTED RETURN									849,195	Schedule III-1, Line 3
29			REQUIREMENT									6,194,984	Line 25 plus Line 28
30			LESS OTHER REVENUES									280,332	8
31			Revenue for Rate Design								(to VI, line 1)	5,914,652	negative, add the two lines)
32	666	766	Regulatory (rate case) expense									73,013	19

* Supporting detailed information is provided in WP-I-1

Old

SCHEDULES - CLASS B RATE/TARIFF CHANGE I-1 REVENUE REQUIREMENT SUMMARY - WATER	UTILITY NAME: <u>Endine Texas LLC</u>
PUCT Docket No. 50200	Test Year End: 9/30/2019

A	B		C					D	E	F=D+E	G	
	Water	Sewer	ORBIT WATER CONSUMERS	SUBURBAN	COMMUNITY	GULF COAST WATER	CHUCK BELL	Historical Test Year	K & M Changes*	Adjusted Test Year	Reference / Instructions	
Line	Acct No.	Account Name										
1	610 710	Purchased water/sewer treatment		17,479		12,715		6,892	37,086	(26,527)	10,559	1
2		Sludge Removal Expense							-	-	-	2
3	615 1 715 1	Power Expense-production only	57,580	43,163	33,662	6,411	11,550	21,048	173,413	23,212	196,625	3
4	618 718	expenses	44,677	17,769	20,493	4,948		289	91,562	5,632	97,194	4
5	601 1 701 1	Employee labor							-	-	-	5
6	620 720	Materials	4,691	3,706	2,176	173		676	12,475	1,162	13,637	6
7	631-642 731-736	Contract work	645,044	520,808	390,984	69,348		135,761	1,850,466	41,714	1,892,180	7
8	650 750	Transportation expenses							-	-	-	8
9	664 764	Other plant maintenance							-	-	-	9
10	601 2 702 2	Office salaries							-	-	-	10
11	603 703	Mgmt salaries							-	-	-	11
12	604 704	Employee pensions & benefits							-	-	-	12
13	615 2 715 2	Purchased power-Office only							-	-	-	13
14	670 770	Bad debt expense	17,076	69,381	11,345	4,482		1,492	104,504	(54,859)	49,645	14
15	676 776	Office services & rentals							-	35,154	35,154	15
16	677 777	Office supplies & expenses							-	-	-	16
17	678 778	Professional services							-	-	-	17
18	684 756-759	Insurance	17,199	16,347	12,811	2,083		3,533	60,388	(1,180)	59,208	18
19	667 767	Regulatory expense (other)	16,891	74,512	30,705	5,976		2,616	132,496	(89,677)	42,819	19
20	675 775	Miscellaneous expenses	29,872	24,903	14,624	4,949		5,774	82,369	1,847,182	1,929,551	20
21		Total operating Expenses	833,030	788,068	516,800	111,084		161,690	2,544,758	1,781,814	4,326,572	Add Lines 1-20
22	403	Depreciation	248,815	65,820	69,282	46,029		47,295	507,586	56,320	563,906	Schedule III-3, Column F, Line 32
23	408	Taxes Other than Income	15,556	19,625	12,390	2,189		2,510	54,163	267,317	321,479	Schedule IV-2, Column F, Line 8
24	409/10	Income Tax Expense							-	188,675	188,675	Schedule V-1, Column C, Line 6
25		TOTAL EXPENSES	1,097,401	873,514	598,472	159,302		211,496	3,106,506	2,294,126	5,400,632	Add Lines 21-24
26		TOTAL HISTORIC REVENUE	1,197,508	1,071,195	528,788	121,828		301,720	3,162,977			Schedule I-2(a), Line 6
27		RETURN	100,105	(6,319)	(72,705)	(37,907)		90,224	56,471			Line 26 less Line 25
28		REQUESTED RETURN									849,579	Schedule III-1, Line 3
29		REQUIREMENT									6,250,211	Line 25 plus Line 28
30		LESS OTHER REVENUES									280,332	8
31		Revenue for Rate Design							(to VI, line 1)		5,969,879	negative, add the two lines)
32	666 766	Regulatory (rate case) expense									73,013	19

* Supporting detailed information is provided in WP-1-1

Difference

SCHEDULES - CLASS B RATE/TARIFF CHANGE I-1 REVENUE REQUIREMENT SUMMARY - WATER PUCT Docket No. 50200	UTILITY NAME _____ 0 Test Year End 1/0/1900
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A	B		C					D	E	F=D+E	G
	Water	Sewer	ORBIT WATER CONSUMERS	SUBURBAN	COMMUNITY	GULF COAST WATER	CHUCK BELL	Historical Test Year	K & M Changes*	Adjusted Test Year	Reference / Instructions
Line	Acct. No.		Account Name								
1	610	710	Purchased water/sewer treatment	-	-	-	-	-	-	-	1
2		711	Sludge Removal Expense	-	-	-	-	-	-	-	2
3	615 1	715 1	Power Expense-production only	-	-	-	-	-	-	-	3
4	618	718	expenses	-	-	-	-	-	-	-	4
5	601 1	701 1	Employee labor	-	-	-	-	-	-	-	5
6	620	720	Materials	-	-	-	-	-	-	-	6
7	631-642	731-736	Contract work	-	-	-	-	-	-	-	7
8	650	750	Transportation expenses	-	-	-	-	-	-	-	8
9	664	764	Other plant maintenance	-	-	-	-	-	-	-	9
10	601 2	702 2	Office salaries	-	-	-	-	-	-	-	10
11	603	703	Mgmt salaries	-	-	-	-	-	-	-	11
12	604	704	Employee pensions & benefits	-	-	-	-	-	-	-	12
13	615 2	715 2	Purchased power-Office only	-	-	-	-	-	-	-	13
14	670	770	Bad debt expense	-	-	-	-	-	-	-	14
15	676	776	Office services & rentals	-	-	-	-	-	-	-	15
16	677	777	Office supplies & expenses	-	-	-	-	-	-	-	16
17	678	778	Professional services	-	-	-	-	-	-	-	17
18	684	756-759	Insurance	-	-	-	-	-	-	-	18
19	667	767	Regulatory expense (other)	-	-	-	-	-	-	-	19
20	675	775	Miscellaneous expenses	-	-	-	-	-	(51,085)	(51,085)	20
21			Total operating Expenses	-	-	-	-	-	(51,085)	(51,085)	Add Lines 1-20
22	403		Depreciation	-	-	-	-	-	-	-	Schedule III-3, Column F, Line 32
23	408		Taxes Other than Income	-	-	-	-	-	(3,672)	(3,672)	Schedule IV-2, Column F, Line 8
24	409/10		Income Tax Expense	-	-	-	-	-	(85)	(85)	Schedule V-1, Column C, Line 6
25			TOTAL EXPENSES	-	-	-	-	-	(54,843)	(54,843)	Add Lines 21-24
26			TOTAL HISTORIC REVENUE								Schedule I-2(a), Line 6
27			RETURN								Line 26 less Line 25
28			REQUESTED RETURN							(384)	Schedule III-1, Line 3
29			REQUIREMENT							(55,227)	Line 25 plus Line 28
30			LESS OTHER REVENUES							(55,227)	8
31			Revenue for Rate Design						(to VI, line 1)	-	negative, add the two lines)
32	666	766	Regulatory (rate case) expense							-	19

* Supporting detailed information is provided in WP-I-1

New

SCHEDULES - CLASS B RATE/TARIFF CHANGE I-1 REVENUE REQUIREMENT SUMMARY - SEWER	UTILITY NAME: <u>Endine Texas LLC</u>
PUCT Docket No. 50200	Test Year End: <u>9/30/2019</u>

A	B		C					D	E	F=D+E	G	
	Water	Sewer	Account Name	EMCAD	ORBII - SEWER	SUGARTREE	GULF COAST SEWER	BOLIVAR	Historical Test Year	K & M Changes*		Adjusted Test Year
1	610	710	Purchased water/sewer treatment	6,100					6,100	-	6,100	Reference / Instructions Schedule II-3, Columns C-E, Line 1
2		711	Sludge Removal Expense	41,029	15,057	13,328	15,949		85,363	21,573	106,936	2
3	615 1	715 1	Power Expense-production only	36,267	10,404	4,028	25,982	687	77,368	64,176	141,545	3
4	618	718	expenses	11,656	6,242	7,043	10,367		35,308	12,431	47,739	4
5	601 1	701 1	Employee labor						-	-	-	5
6	620	720	Materials	221			292		513	4,458	4,971	6
7	631-636	731-736	Contract work	188,674	72,832	67,664	159,819	3,785	492,774	317,612	810,387	7
8	650	750	Transportation expenses						-	-	-	8
9	664	764	Other plant maintenance						-	-	-	9
10	601 2	702 2	Office salaries						-	-	-	10
11	603	703	Mgmt salaries						-	-	-	11
12	604	704	Employee pensions & benefits						-	-	-	12
13	615 2	715 2	Purchased power-Office only						-	-	-	13
14	670	770	Bad debt expense	3,649	1,190	1,328	1,084	27	7,279	7,905	15,185	14
15	676	776	Office services & rentals						-	11,078	11,078	15
16	677	777	Office supplies & expenses						-	-	-	16
17	678	778	Professional services						-	-	-	17
18	684	756-759	Insurance	3,392	1,539	1,212	3,210	909	10,263	9,006	19,269	18
19	667	767	Regulatory expense (other)	6,628	6,963	3,866	4,415	26	21,898	3,182	25,081	19
20	675	775	Miscellaneous expenses	6,618	2,415	4,734	5,551	684	20,001	565,477	585,478	20
21			Total operating Expenses	304,234	116,643	103,203	226,669	6,118	756,868	1,016,900	1,773,768	Add Lines 1-20
22	403		Depreciation	114,866	31,893	7,214	64,056	3,634	221,662	246,632	468,294	Schedule III-3, Column F, Line 32
23	408		Taxes Other than Income	8,648	1,422	870	2,255	69	13,265	46,102	59,367	Schedule IV-2, Column F, Line 8
24	409/10		Income Tax Expense						-	189,466	189,466	Schedule V-1, Column C, Line 6
25			TOTAL EXPENSES	427,748	149,958	111,287	292,981	9,821	991,795	1,499,099	2,490,894	Add Lines 21-24
26			TOTAL HISTORIC REVENUE	11,445	11,445	11,445	11,445	11,445	805,578			Schedule I-2(a), Line 6
27			RETURN	(60,708)	(70,940)	29,728	(85,921)	1,624	(186,217)			Line 26 less Line 25
28			REQUESTED RETURN								853,191	Schedule III-1, Line 3
29			REQUIREMENT								3,344,085	Line 25 plus Line 28
30			LESS OTHER REVENUES								81,007	8
31			Revenue for Rate Design							(to VI, line 1)	3,263,078	negative, add the two lines
32	666	766	Regulatory (rate case) expense								22,558	19

* Supporting detailed information is provided in WP-I-1

Old

SCHEDULES - CLASS B RATE/TARIFF CHANGE I-1 REVENUE REQUIREMENT SUMMARY - SEWER	UTILITY NAME <u>Endline Texas LLC</u>
PUCT Docket No. 50200	Test Year End <u>9/30/2019</u>

A	B		C					D	E	F=D+E	G	
								Historical	K & M	Adjusted		
Line	Water	Sewer	Account Name	EMCAD	ORBII - SEWER	SUGARTREE	GULF COAST SEWER	BOLIVAR	Test Year	Changes*	Test Year	Reference / Instructions
1	610	710	Purchased water/sewer treatment	6,100					6,100	-	6,100	1
2		711	Sludge Removal Expense	41,029	15,057	13,328	15,949		85,363	21,573	106,936	2
3	615.1	715.1	Power Expense-production only	36,267	10,404	4,028	25,982	687	77,368	64,176	141,545	3
4	618	718	expenses	11,656	6,242	7,043	10,367		35,308	12,431	47,739	4
5	601.1	701.1	Employee labor						-	-	-	5
6	620	720	Materials	221			292		513	4,458	4,971	6
7	631-636	731-736	Contract work	188,674	72,832	67,664	159,819	3,785	492,774	317,612	810,387	7
8	650	750	Transportation expenses						-	-	-	8
9	664	764	Other plant maintenance						-	-	-	9
10	601.2	702.2	Office salaries						-	-	-	10
11	603	703	Mgmt salaries						-	-	-	11
12	604	704	Employee pensions & benefits						-	-	-	12
13	615.2	715.2	Purchased power-Office only						-	-	-	13
14	670	770	Bad debt expense	3,649	1,190	1,328	1,084	27	7,279	7,905	15,185	14
15	676	776	Office services & rentals						-	11,078	11,078	15
16	677	777	Office supplies & expenses						-	-	-	16
17	678	778	Professional services						-	-	-	17
18	684	756-759	Insurance	3,392	1,539	1,212	3,210	909	10,263	9,006	19,269	18
19	667	767	Regulatory expense (other)	6,628	6,963	3,866	4,415	26	21,898	3,182	25,081	19
20	675	775	Miscellaneous expenses	6,618	2,415	4,734	5,551	684	20,001	581,576	601,577	20
21			Total operating Expenses	304,234	116,643	103,203	226,669	6,118	756,868	1,032,999	1,789,867	Add Lines 1-20
22		403	Depreciation	114,866	31,893	7,214	64,056	3,634	221,662	246,632	468,294	Schedule III-3, Column F, Line 32
23		408	Taxes Other than Income	8,648	1,422	870	2,255	69	13,265	46,343	59,607	Schedule IV-2, Column F, Line 8
24		409/10	Income Tax Expense						-	189,493	189,493	Schedule V-1, Column C, Line 6
25			TOTAL EXPENSES	427,748	149,958	111,287	292,981	9,821	991,795	1,515,466	2,507,261	Add Lines 21-24
26			TOTAL HISTORIC REVENUE	447,041	379,017	141,015	297,062	11,445	805,578			Schedule I-2(a), Line 6
27			RETURN	(60,708)	(70,940)	29,728	(85,921)	1,624	(186,217)			Line 26 less Line 25
28			REQUESTED RETURN REQUIREMENT								853,312	Schedule III-1, Line 3
29			LESS OTHER REVENUES								3,360,573	Line 25 plus Line 28
30			Revenue for Rate Design							(to VI, line 1)	81,007	8
31											3,279,565	negative, add the two lines
32	666	766	Regulatory (rate case) expense								22,358	19

* Supporting detailed information is provided in WP-I-1

Difference

SCHEDULES - CLASS B RATE/TARIFF CHANGE I-1 REVENUE REQUIREMENT SUMMARY - SEWER	UTILITY NAME <u>Undine Texas LLC</u> Test Year End 1/0/1900
0	

A	B		C				D	E	F=D+E	G	
	Water	Sewer	EMCAD	SEWER	SUGARTREE	SEWER	BOLIVAR	Historical Test Year	K & M Changes*	Adjusted Test Year	Reference / Instructions
Line	Acct. No.	Account Name									
1	610 710	Purchased water/sewer treatment	-	-	-	-	-	-	-	-	1
2		Sludge Removal Expense	-	-	-	-	-	-	-	-	2
3	615 1 715 1	Power Expense-production only	-	-	-	-	-	-	-	-	3
4	618 718	expenses	-	-	-	-	-	-	-	-	4
5	601 1 701 1	Employee labor	-	-	-	-	-	-	-	-	5
6	620 720	Materials	-	-	-	-	-	-	-	-	6
7	631-636 731-736	Contract work	-	-	-	-	-	-	-	-	7
8	650 750	Transportation expenses	-	-	-	-	-	-	-	-	8
9	664 764	Other plant maintenance	-	-	-	-	-	-	-	-	9
10	601 2 702 2	Office salaries	-	-	-	-	-	-	-	-	10
11	603 703	Mgmt salaries	-	-	-	-	-	-	-	-	11
12	604 704	Employee pensions & benefits	-	-	-	-	-	-	-	-	12
13	615 2 715 2	Purchased power-Office only	-	-	-	-	-	-	-	-	13
14	670 770	Bad debt expense	-	-	-	-	-	-	-	-	14
15	676 776	Office services & rentals	-	-	-	-	-	-	-	-	15
16	677 777	Office supplies & expenses	-	-	-	-	-	-	-	-	16
17	678 778	Professional services	-	-	-	-	-	-	-	-	17
18	684 756-759	Insurance	-	-	-	-	-	-	-	-	18
19	667 767	Regulatory expense (other)	-	-	-	-	-	-	-	-	19
20	675 775	Miscellaneous expenses	-	-	-	-	-	-	(16,099)	(16,099)	20
21		Total operating Expenses	-	-	-	-	-	-	(16,099)	(16,099)	Add Lines 1-20
22	403	Depreciation	-	-	-	-	-	-	-	-	Schedule III-3, Column F, Line 32
23	408	Taxes Other than income	-	-	-	-	-	-	(241)	(241)	Schedule IV-2, Column F, Line 8
24	409/10	Income Tax Expense	-	-	-	-	-	-	(27)	(27)	Schedule V-1, Column C, Line 6
25		TOTAL EXPENSES	-	-	-	-	-	-	(16,367)	(16,367)	Add Lines 21-24
26		TOTAL HISTORIC REVENUE									Schedule I-2(a), Line 6
27		RETURN									Line 26 less Line 25
28		REQUESTED RETURN								(121)	Schedule III-1, Line 3
29		REQUIREMENT								(16,488)	Line 25 plus Line 28
30		LESS OTHER REVENUES								-	8
31		Revenue for Rate Design							(to VI, line 1)	(16,488)	negative, add the two lines
32	666 766	Regulatory (rate case) expense								-	19

* Supporting detailed information is provided in WP-I-1