А	I	3	С	D	E	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment	<u>.</u>	_	_	Schedule II-3, Columns C-E, Line 1
2.	010	711	Sludge Removal Expense	_			Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps	11,464	443	11,907	Schedule II-3, Columns C-E, Line 3
	015.1	715.1	Chemicals and other volume related	11,404		11,907	Schedule II-5, Columnis C-L, Line 5
4.	618	718	expenses	789	4,628	5,417	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	0	-	0	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	33,027	-	33,027	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	_	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	1,995	1,995	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	10	-	10	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	9,436	(652)	8,784	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	10,116	-	10,116	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	46,782	4,353	51,134	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	111,625	10,767	122,391	Add Lines 1-20
22.	40	)3	Depreciation	3,262	15,930	19,192	Schedule III-3, Column F, Line 32
23.	40	)8	Taxes Other than Income	349	644	992	Schedule IV-2, Column F, Line 8
24.		/10	Income Tax Expense			9,213	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	115,235	27,341	151,789	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	70,136	Labora 🗭 record (2013)	and a subset 💌 constrained	Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(45,100)			Line 26 less Line 25
28.			REQUESTED RETURN	(10,100)		49,866	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			201,655	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			1,498	Schedule II-2(b), Column D, Line 8
						2,.20	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	200,157	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			573	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer	A coount Name	Test Year	Changes	Test Year	Reference / Instructions
			Account Name Purchased water/sewer treatment				Schedule II-3, Columns C-E, Line 1
1. 2.	610	710		-	-	-	
		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	-	3,058	3,058	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	3,303	(1,911)	1,391	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	52	-	52	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	48,100	(4,598)	43,502	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits		-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	1,280	1,280	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	7	-	7	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	4,951	3,894	8,845	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	3,999	-	3,999	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	30,270	(248)	30,022	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	90,682	1,474	92,156	Add Lines 1-20
22.	40	)3	Depreciation	1,651	5,868	7,519	Schedule III-3, Column F, Line 32
23.	40	)8	Taxes Other than Income	2,818	374	3,193	Schedule IV-2, Column F, Line 8
24.			Income Tax Expense			4,141	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	95,150	7,717	107,009	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	52,660			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(42,490)	-		Line 26 less Line 25
28.			REQUESTED RETURN	(, 0)		22,412	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			129,421	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			1,052	Schedule II-2(b), Column D, Line 8
						-,	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	128,369	negative, add the two lines)
			· · · · · · · · · · · · · · · · · · ·				1
32.	666	766	Regulatory (rate case) expense			414	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet. Water	No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610		Purchased water/sewer treatment	22,905	(22,905)		Schedule II-3, Columns C-E, Line 1
1. 2.	010	710		,		-	
3.		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
5.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	-	817	817	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	100	129	229	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	816	-	816	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	50,341	(17,432)	32,909	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	560	560	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	÷	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	-	-	-	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	311	2,005	2,316	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	3,275	-	3,275	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	2,845	6,570	9,416	Schedule II-3, Columns C-E, Line 19
20.			-			_	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	80,593	(30,256)	50,337	Add Lines 1-20
22.	40	)3	Depreciation	165	(77)	88	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	<u> </u>	279	279	Schedule IV-2, Column F, Line 8
24.	409		Income Tax Expense			Second 1	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	80,759	(30,055)		Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	21,878			Schedule I-2(a), Line 6
20.			HISTORICAL TEST YEAR RETURN	(58,881)			Line 26 less Line 25
28.			REQUESTED RETURN	(50,001)		5,698	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			57,454	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			1,148	Schedule II-2(b), Column D, Line 8
						1,170	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	56,306	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			471	Schedule II-11, Column D, Line 19

Α	I	3	С	D	Е	F=D+E	G
				Historical	К&М	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment	<u>.</u>	<u>-</u>	-	Schedule II-3, Columns C-E, Line 1
2.	010	711	Sludge Removal Expense	_		-	Schedule II-3, Columns C-E, Line 2
3.	615.1		Power Expense-wells, booster pumps	11,997	9,429	21,427	Schedule II-3, Columns C-E, Line 3
	015.1	715.1	Chemicals and other volume related	11,997	9,429	21,427	Schedule II-5, Columnis C-E, Line 5
4.	618	718	expenses	1,829	7,919	9,748	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	0	-	0	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	72,076	-	72,076	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	4,667	4,667	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	16	-	16	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	14,595	53,401	67,995	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	19,368	-	19,368	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	71,429	8,765	80,194	Schedule II-3, Columns C-E, Line 19
20.			-			-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	191,310	84,181	275,491	Add Lines 1-20
22.	40	)3	Depreciation	12,735	34,399	47,134	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	552	1,774	2,326	Schedule IV-2, Column F, Line 8
24.		)/10	Income Tax Expense			23,166	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	204,598	120,354	348,118	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	139,543			Schedule I-2(a), Line 6
20.			HISTORICAL TEST YEAR RETURN	(65,055)			Line 26 less Line 25
28.			REQUESTED RETURN	(00,000)		125,393	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			473,511	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			5,011	Schedule II-2(b), Column D, Line 8
						5,011	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	468,500	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			907	Schedule II-11, Column D, Line 19

Α	I	3	С	D	Е	F=D+E	G
		- 11-		Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment	. <u>.</u>		-	Schedule II-3, Columns C-E, Line 1
2.	010	710	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	(15.1		Power Expense-wells, booster pumps	7,204		3,653	Schedule II-3, Columns C-E, Line 3
	615.1	715.1	Chemicals and other volume related	7,204	(3,551)	5,055	Schedule II-5, Columnis C-E, Eine 5
4.	618	718	expenses	1,129	533	1,662	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	26	-	26	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	33,137	15,188	48,324	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-		Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	÷	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	1,468	1,468	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	6	-	6	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	2,103	6,591	8,694	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	1,420	-	1,420	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	12,600	3,742	16,342	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	57,623	23,972	81,595	Add Lines 1-20
22.	4(	03	Depreciation	1,087	16,690	17,776	Schedule III-3, Column F, Line 32
23.	4(	)8	Taxes Other than Income	(1)	731	730	Schedule IV-2, Column F, Line 8
24.	409	0/10	Income Tax Expense			7,563	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	58,709	41,393	107,665	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	29,205			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(29,504)			Line 26 less Line 25
28.			REQUESTED RETURN			40,934	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			148,599	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			1,031	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	147,568	negative, add the two lines)
<b></b>			· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·		1
32.	666	766	Regulatory (rate case) expense			309	Schedule II-11, Column D, Line 19

Α	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment	<u>.</u>	<u>-</u>		Schedule II-3, Columns C-E, Line 1
2.	010	711	Sludge Removal Expense	_			Schedule II-3, Columns C-E, Line 2
3.	615.1		Power Expense-wells, booster pumps	19,590	(4,629)	14,962	Schedule II-3, Columns C-E, Line 3
	015.1	715.1	Chemicals and other volume related	19,390	(4,029)	14,902	Schedule II-5, Columnis C-E, Line 5
4.	618	718	expenses	6,836	(29)	6,807	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	7 <b>—</b> 1	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	277	-	277	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	85,738	-	85,738	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	×	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	4,533	4,533	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	15	-	15	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	13,505	12,228	25,734	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	8,340	-	8,340	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	66,413	7,983	74,396	Schedule II-3, Columns C-E, Line 19
20.							Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	200,714	20,087	220,801	Add Lines 1-20
22.	40	)3	Depreciation	21.012	39,402	60,414	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	9,278	1,751	11,029	Schedule IV-2, Column F, Line 8
24.		/10	Income Tax Expense	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	1,701	26,253	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	231,004	61,240	318,497	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	160.838			Schedule I-2(a), Line 6
20.			HISTORICAL TEST YEAR RETURN	(70,166)			Line 26 less Line 25
27.			REQUESTED RETURN	(70,100)		142,099	Schedule III-1, Line 3
29.			TOTAL REVENUE REOUIREMENT			460,595	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			5,465	Schedule II-2(b), Column D, Line 8
50.			LEGG. O THER REVENUES	-		5,405	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	455,130	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			830	Schedule II-11, Column D, Line 19

Α	I	3	С	D	Е	F=D+E	G
				Historical	К&М	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
						~	
1. 2.	610	710	Purchased water/sewer treatment	-	Ξ.	-	Schedule II-3, Columns C-E, Line 1
		711	Sludge Removal Expense	-			Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	5,924	(2,851)	3,073	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	923	475	1,398	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	(0)	-	(0)	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	10,087	-	10,087	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	÷	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	896	896	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-		Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	4	-	4	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	3,261	5,625	8,885	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	2,038	-	2,038	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	19,029	(1,916)	17,113	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	41,265	2,229	43,494	Add Lines 1-20
22.	4(	)3	Depreciation	5,997	3,902	9,899	Schedule III-3, Column F, Line 32
23.		08	Taxes Other than Income	121	324	446	Schedule IV-2, Column F, Line 8
24.			Income Tax Expense			5,905	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	47,383	6,456	59,743	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	52,243		unarran e na 19942	Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	4,860			Line 26 less Line 25
28.			REQUESTED RETURN	.,000		31,962	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			91,705	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			1,814	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	89,891	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			201	Schedule II-11, Column D, Line 19

Α	I	3	С	D	Е	F=D+E	G
		2.77		Historical	K & M	Adjusted	
Line	Acet Water	No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610		Purchased water/sewer treatment	<u> </u>			Schedule II-3, Columns C-E, Line 1
1. 2.	010	710				-	
3.		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
5.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	7,063	6,820	13,883	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	6,842	(526)	6,316	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	-	-	=	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	35,983	17,943	53,926	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-		Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	.=)	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	_	3,285	3,285	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	÷		Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	17	-	17	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	5,367	12,138	17,505	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	2,512	-	2,512	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	33,580	12,441	46,021	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	91,363	52,101	143,464	Add Lines 1-20
22.	40	)3	Depreciation	9,212	43,508	52,721	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	194	1,631	1,825	Schedule IV-2, Column F, Line 8
24.	409		Income Tax Expense		1,001	20,607	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	100,769	97,241	218,616	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	123,881	un in Pranodikisi	no. La secondr≢ a ca dell'a l'E	Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	23,113			Line 26 less Line 25
28.			REQUESTED RETURN	20,110		111,538	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			330,154	Line 25 plus Line 28
30.			LESS: OTHER REVENUES				Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	330,149	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			935	Schedule II-11, Column D, Line 19

Α	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer		Test Year	Changes	Test Year	D-fammer / Instanctions
			Account Name				Reference / Instructions
1. 2.	610	710	Purchased water/sewer treatment	E	-	-	Schedule II-3, Columns C-E, Line 1
		711	Sludge Removal Expense	-		.=)	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps	1,024	(503)	521	Schedule II-3, Columns C-E, Line 3
4.	618	718	Chemicals and other volume related expenses	1,799	(1,562)	237	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	185	-	185	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	41,242	(3,582)	37,660	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-		Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-		Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	599	599	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals		-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	1	-	1	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	668	3,552	4,220	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	2,329	-	2,329	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	3,561	251	3,812	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	50,808	(1,245)	49,563	Add Lines 1-20
22.	40	)3	Depreciation	184	384	568	Schedule III-3, Column F, Line 32
23.	4(	)8	Taxes Other than Income	201	273	474	Schedule IV-2, Column F, Line 8
24.	409	/10	Income Tax Expense			1,512	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	51,192	(587)	52,117	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	5,084			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(46,109)			Line 26 less Line 25
28.			REQUESTED RETURN			8,182	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			60,299	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			130	Schedule II-2(b), Column D, Line 8
					A DEPENDENCE AND		Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	60,169	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			41	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer		Test Year	Changes	Test Year	Reference / Instructions
			Account Name				Schedule II-3, Columns C-E, Line 1
1. 2.	610	710	Purchased water/sewer treatment	-	-	-	
		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	392	1,785	2,177	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	122	869	990	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	9	÷	-	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	2,965	14,200	17,165	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	401	401	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	2	-	2	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	106	4,423	4,529	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	-	-	_	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	1,313	1,844	3,158	Schedule II-3, Columns C-E, Line 19
20.						_	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	4,901	23,522	28,423	Add Lines 1-20
22.	40	)3	Depreciation	59	2,802	2,861	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	_	200	200	Schedule IV-2, Column F, Line 8
24.		/10	Income Tax Expense			1,376	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	4,960	26,524	32,860	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	1,680		in new an ended by	Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(3,280)			Line 26 less Line 25
28.			REQUESTED RETURN	(2,200)		7,449	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			40,309	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			-	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	40,309	negative, add the two lines)
			· · · · · · · · · · · · · · · · · · ·		<b>I</b>		
32.	666	766	Regulatory (rate case) expense			132	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer		Test Year	Changes	Test Year	D-fammer / Instanctions
			Account Name				Reference / Instructions
1. 2.	610	710	Purchased water/sewer treatment	-	-	-	Schedule II-3, Columns C-E, Line 1
		711	Sludge Removal Expense	-		-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	6,836	(3,171)	3,665	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	6,320	(4,653)	1,667	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	337	-	337	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	44,535	(3,682)	40,853	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits				Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	1,262	1,262	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	2	-	2	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	1,697	6,756	8,454	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	4,160	-	4,160	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	9,953	(444)	9,509	Schedule II-3, Columns C-E, Line 19
20.						_	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	73,839	(3,931)	69,908	Add Lines 1-20
22.	4(	)3	Depreciation	4,300	15,450	19,749	Schedule III-3, Column F, Line 32
23.	4(	)8	Taxes Other than Income	77	566	643	Schedule IV-2, Column F, Line 8
24.	409	/10	Income Tax Expense			5,759	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	78,216	12,085	96,060	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	21,091			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(57,125)			Line 26 less Line 25
28.			REQUESTED RETURN	/		31,172	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			127,232	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			449	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	126,783	negative, add the two lines)
			· · · · · · · · · · · · · · · · · · ·				I
32.	666	766	Regulatory (rate case) expense			105	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet. Water	No. Sewer		Test Year	Changes	Test Year	Reference / Instructions
			Account Name				Schedule II-3, Columns C-E, Line 1
1. 2.	610	710	Purchased water/sewer treatment	-	-	-	
		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	2,185	20,990	23,175	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	1,577	8,967	10,544	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	-	-	-	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	40,114	31,804	71,918	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	2,436	2,436	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	25	-	25	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	4,837	5,104	9,941	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	7,744	-	7,744	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	30,869	18,027	48,896	Schedule II-3, Columns C-E, Line 19
20.			1			-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	87,350	87,328	174,678	Add Lines 1-20
22.	4(	)3	Depreciation	127	14,410	14,538	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	4	1,208	1,212	Schedule IV-2, Column F, Line 8
24.	409		Income Tax Expense		1,200		
25.	102		TOTAL EXPENSES	87,482	102,945	198,909	Add Lines 21-24
26.	$\vdash$		TOTAL HISTORIC REVENUE	67,677		1000 T2700 T	Schedule I-2(a), Line 6
20.			HISTORICAL TEST YEAR RETURN	(19,805)			Line 26 less Line 25
27.			REQUESTED RETURN	(19,003)		45,908	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			244,817	Line 25 plus Line 28
30.	$\vdash$		LESS: OTHER REVENUES			244,817	Schedule II-2(b), Column D, Line 8
50.			LLUU, O ITIER REVENUED			30	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	244,787	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			1,409	Schedule II-11, Column D, Line 19

Α	I	3	С	D	E	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment	. <u>.</u>	_	=	Schedule II-3, Columns C-E, Line 1
2.	010	711	Sludge Removal Expense	_		-	Schedule II-3, Columns C-E, Line 2
3.	(15.1		Power Expense-wells, booster pumps	355	3,228	2 592	Schedule II-3, Columns C-E, Line 3
	615.1	715.1	Chemicals and other volume related	555	5,220	3,583	Schedule II-5, Columnis C-E, Line 5
4.	618	718	expenses	584	1,046	1,630	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	-	-	-	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	2,123	6,242	8,366	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	.=)	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	505	505	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	4	-	4	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	174	4,658	4,832	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	_	-	-	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	1,224	3,035	4,260	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	4,465	18,714	23,179	Add Lines 1-20
22.	40	)3	Depreciation	347	5,194	5,541	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income		251	251	Schedule IV-2, Column F, Line 8
24.	409		Income Tax Expense			3,393	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	4,811	24,160		Add Lines 21-24
26.		$\vdash$	TOTAL HISTORIC REVENUE	4,345	,	,- 0 1	Schedule I-2(a), Line 6
20.			HISTORICAL TEST YEAR RETURN	(466)			Line 26 less Line 25
27.			REQUESTED RETURN	(400)		18,365	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			50,728	Line 25 plus Line 28
30.		$\vdash$	LESS: OTHER REVENUES			50,720	Schedule II-2(b), Column D, Line 8
50.			ELSS. O ITIER REVENUES			-	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	50,728	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			218	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	К&М	Adjusted	
Line	Acet Water	No. Sewer		Test Year	Changes	Test Year	Reference / Instructions
			Account Name			~	
1. 2.	610	710	Purchased water/sewer treatment		-	-	Schedule II-3, Columns C-E, Line 1
		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	372	-	372	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	265	-	265	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	-	-	-	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	13,974	-	13,974	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	.=)	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	403	403	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	0	-	0	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	160	4,088	4,249	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	6,538	-	6,538	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	706	172	878	Schedule II-3, Columns C-E, Line 19
20.							Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	22,014	4,663	26,678	Add Lines 1-20
22.	40	)3	Depreciation	976	(82)	894	Schedule III-3, Column F, Line 32
23.	40	)8	Taxes Other than Income	8	192	200	Schedule IV-2, Column F, Line 8
24.	409		Income Tax Expense			1,987	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	22,999	4,774	29,759	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	795			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(22,204)			Line 26 less Line 25
28.			REQUESTED RETURN	(22,231)		10,755	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			40,514	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			,	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	40,469	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			14	Schedule II-11, Column D, Line 19

А	]	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Tina	Acet Water	. No. Sewer		Test Year	Changes	Test Year	
Line			Account Name				Reference / Instructions
1. 2.	610	710	Purchased water/sewer treatment	E	-	-	Schedule II-3, Columns C-E, Line 1
		711	Sludge Removal Expense	-	-	->	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps	2,785	-	2,785	Schedule II-3, Columns C-E, Line 3
4.	618	718	Chemicals and other volume related expenses	1,272	-	1,272	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	52	-	52	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	32,068	122	32,190	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	_	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits			-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	613	613	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-		=	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	1	-	1	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	620	3,602	4,223	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	1,899	-	1,899	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	3,608	(356)	3,252	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	42,306	3,981	46,287	Add Lines 1-20
22.	40	)3	Depreciation	1,362	338	1,700	Schedule III-3, Column F, Line 32
23.	40	)8	Taxes Other than Income	636	282	918	Schedule IV-2, Column F, Line 8
24.	409	/10	Income Tax Expense			2,014	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	44,304	4,601	50,918	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	5,690			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(38,614)			Line 26 less Line 25
28.			REQUESTED RETURN			10,901	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			61,819	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			224	Schedule II-2(b), Column D, Line 8
					zi burginta anti		Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	61,595	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			39	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment			201	Schedule II-3, Columns C-E, Line 1
2.	010					-	
3.		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
5.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	12,026	2,121	14,147	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	3,471	2,966	6,436	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	0	÷	0	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	35,273	-	35,273	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	_	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	_	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	107	1,808	1,916	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	14	-	14	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	12,583	(3,653)	8,930	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	3,983	-	3,983	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	59,999	7,614	67,612	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	127,456	10,856	138,312	Add Lines 1-20
22.	40	)3	Depreciation	1,965	18,631	20,596	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	6,247	485	,	Schedule IV-2, Column F, Line 8
24.	409		Income Tax Expense				Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	135,669	29,972		Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	162,545			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	26,877			Line 26 less Line 25
28.			REQUESTED RETURN	20,017		24,754	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT				Line 25 plus Line 28
30.			LESS: OTHER REVENUES				Schedule II-2(b), Column D, Line 8
						-,	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	191,961	negative, add the two lines)
			r				1
32.	666	766	Regulatory (rate case) expense			783	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
		5°7		Historical	K & M	Adjusted	
Line	Acet. Water	No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610		Purchased water/sewer treatment	24.392	(24,392)		Schedule II-3, Columns C-E, Line 1
1. 2.	010	710		,		-	
3.		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
5.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	1,528	2,784	4,313	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	(0)	1,210	1,209	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	66	-	66	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	59,503	15,178	74,680	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	360	-	360	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	.=)	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	1,637	1,637	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-		Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	7	-	7	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	6,632	2,210	8,842	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	1,662	_	1,662	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	41,331	(186)	41,145	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	135,480	(1,559)	133,921	Add Lines 1-20
22.	40	)3	Depreciation	4,105	2,165	6,270	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	337	570	908	Schedule IV-2, Column F, Line 8
24.	409		Income Tax Expense			00000000	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	139,922	1,176	144,972	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	54,420	and a second state	and the second second	Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(85,502)			Line 26 less Line 25
28.			REQUESTED RETURN	(00,002)		20,964	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			165,936	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			1,645	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	164,291	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			408	Schedule II-11, Column D, Line 19

Α	Ι	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment	-	<u>_</u>	-	Schedule II-3, Columns C-E, Line 1
2.	010	711	Sludge Removal Expense	_		_	Schedule II-3, Columns C-E, Line 2
3.	(15.1		Power Expense-wells, booster pumps		2.742	2,742	Schedule II-3, Columns C-E, Line 3
	615.1	715.1	Chemicals and other volume related	(0)	2,742	2,742	Schedule II-5, Columnis C-E, Line 5
4.	618	718	expenses	1,041	207	1,247	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	52	-	52	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	39,862	(2,865)	36,997	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-		Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-		-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	.=)	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	737	737	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals		-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	3	-	3	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	2,988	1,391	4,379	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	4,655	-	4,655	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	14,748	1,073	15,822	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	63,350	3,285	66,635	Add Lines 1-20
22.	40	)3	Depreciation	150	430	580	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	111	256	367	Schedule IV-2, Column F, Line 8
24.	409		Income Tax Expense			1,092	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	63,611	3,971	68,674	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	42,958	and a second second	A Thomas • according to	Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(20,653)			Line 26 less Line 25
28.			REQUESTED RETURN	(20,033)		5,911	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			74,585	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			610	Schedule II-2(b), Column D, Line 8
						010	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	73,975	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			185	Schedule II-11, Column D, Line 19

Α	I	3	С	D	Е	F=D+E	G
		- 11-		Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment	<u>.</u>		-	Schedule II-3, Columns C-E, Line 1
2.	010	710	Sludge Removal Expense	-		-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps	4,110		4,110	Schedule II-3, Columns C-E, Line 3
	015.1	/15.1	Chemicals and other volume related	4,110	-	4,110	Schedule II-5, Columnis C-E, Ellie 5
4.	618	718	expenses	244	-	244	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	0	-	0	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	7,058	400	7,458	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	.=	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-		Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	350	350	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	1	-	1	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	595	3,620	4,215	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	299	-	299	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	2,361	294	2,655	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	14,667	4,664	19,331	Add Lines 1-20
22.	4(	)3	Depreciation	304	2,236	2,540	Schedule III-3, Column F, Line 32
23.	4(	)8	Taxes Other than Income	18	156	174	Schedule IV-2, Column F, Line 8
24.	409	9/10	Income Tax Expense			2,083	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	14,990	7,055	24,128	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	1,610			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(13,380)			Line 26 less Line 25
28.			REQUESTED RETURN	/		11,272	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			35,400	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			255	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	35,145	negative, add the two lines)
			[		· · · ·		1
32.	666	766	Regulatory (rate case) expense			33	Schedule II-11, Column D, Line 19

Α	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment		<u>-</u>	-	Schedule II-3, Columns C-E, Line 1
2.	010	711	Sludge Removal Expense	100	_	100	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps	10,693	140	10,833	Schedule II-3, Columns C-E, Line 3
	015.1	715.1	Chemicals and other volume related				
4.	618	718	expenses	14,835	194	15,029	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	648	-	648	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	44,812	(2,590)	42,223	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	1,732	1,732	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	æ		=	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	12	-	12	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	10,328	7,082	17,411	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	9,904	-	9,904	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	46,677	7,372	54,049	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	138,011	13,930	151,941	Add Lines 1-20
22.	40	)3	Depreciation	4,156	743	4,900	Schedule III-3, Column F, Line 32
23.	4(	)8	Taxes Other than Income	1,567	568	2,135	Schedule IV-2, Column F, Line 8
24.	409	/10	Income Tax Expense			3,443	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	143,734	15,241	162,419	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	79,929			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(63,805)			Line 26 less Line 25
28.			REQUESTED RETURN			18,638	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			181,057	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			7,275	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	173,782	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			653	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
	Acet			Test Year	Changes	Test Year	
Line	Water	Sewer	Account Name				Reference / Instructions
1.	610	710	Purchased water/sewer treatment	-	-	=	Schedule II-3, Columns C-E, Line 1
2.		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps	196	-	196	Schedule II-3, Columns C-E, Line 3
4.	618	718	Chemicals and other volume related expenses	-	-	-	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	-	-	-	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	3,302	15,737	19,039	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	303	303	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	2	-	2	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	1,074	(1,074)	0	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	557	-	557	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	9,264	865	10,129	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	14,394	15,832	30,226	Add Lines 1-20
22.	4(	)3	Depreciation	(0)	0	=	Schedule III-3, Column F, Line 32
23.	40	)8	Taxes Other than Income	-	151	151	Schedule IV-2, Column F, Line 8
24.	409	/10	Income Tax Expense			45	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	14,394	15,983	30,422	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	7,014			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(7,380)			Line 26 less Line 25
28.			REQUESTED RETURN			242	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			30,664	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			210	Schedule II-2(b), Column D, Line 8
31.			Revenue for Rate Design		(to VI, line 1)	30,455	Line 29 less Line 30 (if line 30 is negative, add the two lines)
22							
32.	666	766	Regulatory (rate case) expense			99	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	К&М	Adjusted	
Line	Acet Water	No. Sewer		Test Year	Changes	Test Year	Reference / Instructions
			Account Name			~~~~	
1. 2.	610	710	Purchased water/sewer treatment	-	-	-	Schedule II-3, Columns C-E, Line 1
		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	2,735	-	2,735	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	-	-	-	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	-	-	-	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	6,442	57,869	64,311	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	2,051	2,051	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	12	-	12	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	2,602	6,480	9,083	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	(44)	-	(44)	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	7,193	9,127	16,320	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	18,940	75,528	94,468	Add Lines 1-20
22.	40	)3	Depreciation	713	27,395	28,108	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	466	1,020	1,486	Schedule IV-2, Column F, Line 8
24.	409		Income Tax Expense				Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	20,119	103,943	136,866	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	19,384			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(735)			Line 26 less Line 25
28.			REQUESTED RETURN	(100)		69,301	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			206,167	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			-	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	206,167	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			659	Schedule II-11, Column D, Line 19

Α	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment	50			Schedule II-3, Columns C-E, Line 1
1. 2.	010					-	
3.		711	Sludge Removal Expense	-	-		Schedule II-3, Columns C-E, Line 2
	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	-	-	-	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	-	-	-	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	. <del>.</del>	-	-	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	24,896	10,211	35,107	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	.=			Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	475	475	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	0	-	0	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	120	8,260	8,380	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	_	-	-	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	656	256	912	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	25,672	19,203	44,875	Add Lines 1-20
22.	4(	)3	Depreciation	40	13	54	Schedule III-3, Column F, Line 32
23.	40	)8	Taxes Other than Income	0	236	236	Schedule IV-2, Column F, Line 8
24.	409	/10	Income Tax Expense			239	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	25,713	19,452	45,404	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	262			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(25,451)			Line 26 less Line 25
28.			REQUESTED RETURN			1,294	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			46,698	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			(1,064)	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	47,761	negative, add the two lines)
<u> </u>			r		· · · · · ·		Γ
32.	666	766	Regulatory (rate case) expense			19	Schedule II-11, Column D, Line 19

Α	I	3	С	D	E	F=D+E	G
				Historical	К & М	Adjusted	
Line	Acet Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
			Purchased water/sewer treatment	59,944		59,944	Schedule II-3, Columns C-E, Line 1
1. 2.	610	710		39,944		59,944	
3.		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
5.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	29,782	5,696	35,478	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	11,546	2,208	13,754	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	50	-	50	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	93,495	45,814	139,309	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-1	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	н	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	11,835	11,835	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	.=	-	=	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	948	-	948	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	40,428	(36,199)	4,228	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	12,881	-	12,881	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	199,293	40,794	240,087	Schedule II-3, Columns C-E, Line 19
20.			-			_	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	448,365	70,148	518,514	Add Lines 1-20
22.	40	)3	Depreciation	36,982	134,382	171,364	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	6,496	4,227		Schedule IV-2, Column F, Line 8
24.		0/10	Income Tax Expense				Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	491,843	208,757	777,521	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	479,681			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(12,162)			Line 26 less Line 25
28.			REQUESTED RETURN	(12,132)		416,351	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT				Line 25 plus Line 28
30.			LESS: OTHER REVENUES			5,989	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	1,187,883	negative, add the two lines)
í			r				
32.	666	766	Regulatory (rate case) expense			3,444	Schedule II-11, Column D, Line 19

А	I	3	С	D	E	F=D+E	G
		2.7		Historical	K & M	Adjusted	
Line	Acet Water	No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment	<u>-</u>	_		Schedule II-3, Columns C-E, Line 1
2.	010	710	Sludge Removal Expense				Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps	1,558		1,558	Schedule II-3, Columns C-E, Line 3
	015.1	/15.1	Chemicals and other volume related	1,558	-	1,558	Schedule II-5, Columnis C-E, Ellie 5
4.	618	718	expenses	598	-	598	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	-	÷	-	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	9,662	46,896	56,558	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	1,127	1,127	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	=	÷	=	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	5		5	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	1,197	3,269	4,466	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	(45)	-	(45)	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	2,966	3,781	6,747	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	15,942	55,073	71,014	Add Lines 1-20
22.	4(	)3	Depreciation	296	10,694	10,990	Schedule III-3, Column F, Line 32
23.	4(	)8	Taxes Other than Income	22	561	583	Schedule IV-2, Column F, Line 8
24.	409	/10	Income Tax Expense			4,787	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	16,259	66,328	87,374	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	9,208			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(7,052)			Line 26 less Line 25
28.			REQUESTED RETURN	(-,)		25,908	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			113,282	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			-	Schedule II-2(b), Column D, Line 8
31.			Revenue for Rate Design		(to VI, line 1)	113,282	Line 29 less Line 30 (if line 30 is negative, add the two lines)
			~				
32.	666	766	Regulatory (rate case) expense			273	Schedule II-11, Column D, Line 19

Α	Ι	3	С	D	E	F=D+E	G
				Historical	К&М	Adjusted	
Line	Acet. Water	. No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610	710	Purchased water/sewer treatment	<u>-</u>	<u>-</u>	-	Schedule II-3, Columns C-E, Line 1
2.	010	711	Sludge Removal Expense	1,200		1,200	Schedule II-3, Columns C-E, Line 2
3.	615.1		Power Expense-wells, booster pumps	7,791	1,869	9,660	Schedule II-3, Columns C-E, Line 3
	015.1	715.1	Chemicals and other volume related	7,791	1,009	9,000	Schedule II-5, Columnis C-E, Line 5
4.	618	718	expenses	495	119	614	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	-	-	=	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	32,405	(139)	32,266	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	924	924	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	7	-	7	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	4,699	4,146	8,845	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	5,765	-	5,765	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	22,743	3,984	26,726	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	75,105	10,902	86,007	Add Lines 1-20
22.	40	)3	Depreciation	(65)	424	359	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	185	274	460	Schedule IV-2, Column F, Line 8
24.		)/10	Income Tax Expense			909	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	75,226	11,600	87,735	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	53,464	- 10000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000	and any antibutty	Schedule I-2(a), Line 6
20.			HISTORICAL TEST YEAR RETURN	(21,762)			Line 26 less Line 25
28.			REQUESTED RETURN	(21,702)		4,920	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			92,655	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			-	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	92,655	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			369	Schedule II-11, Column D, Line 19

Α	I	3	С	D	Е	F=D+E	G
				Historical	К&М	Adjusted	
Line	Acet Water	. No. Sewer	A account Nome	Test Year	Changes	Test Year	Reference / Instructions
			Account Name			~	Schedule II-3, Columns C-E, Line 1
1. 2.	610	710	Purchased water/sewer treatment	-		-	
		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	528	(41)	488	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	-	-	-	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	300	-	300	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	35,223	(589)	34,634	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	_	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	901	901	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	8	-	8	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	9,427	(2,925)	6,502	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	-	-	-	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	38,566	4,566	43,132	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	84,052	1,913	85,965	Add Lines 1-20
22.	40	)3	Depreciation	(0)	0	=	Schedule III-3, Column F, Line 32
23.	40	)8	Taxes Other than Income	227	221	448	Schedule IV-2, Column F, Line 8
24.	409	/10	Income Tax Expense			617	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	84,279	2,134	87,030	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	11,113			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(73,166)			Line 26 less Line 25
28.			REQUESTED RETURN			3,338	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			90,369	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			10	Schedule II-2(b), Column D, Line 8
							Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	90,358	negative, add the two lines)
<u> </u>			<u>г</u>				
32.	666	766	Regulatory (rate case) expense			471	Schedule II-11, Column D, Line 19

Α	Ι	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet. Water	No. Sewer	Account Name	Test Year	Changes	Test Year	Reference / Instructions
1.	610		Purchased water/sewer treatment				Schedule II-3, Columns C-E, Line 1
1. 2.	610	710				=	
		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	-	-	-	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	-	-	-	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	æ		=	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	764	12,000	12,764	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	_	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	_	160	160	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	<u>-</u>	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	_	-	-	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	_	865	865	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	-		Into Carefactoria	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	1,461	423		Schedule II-3, Columns C-E, Line 19
20.	015	115		1,101			Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	2,224	13,448	15,672	Add Lines 1-20
22.	4(	)2	Depreciation				Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income		80	80	Schedule IV-2, Column F, Line 8
23.	409		Income Tax Expense	-	00	10000	Schedule V-1, Column C, Line 6
25.	402	710	TOTAL EXPENSES	2,224	13,528	15,810	Add Lines 21-24
	$\vdash$				15,526	15,610	
26.			TOTAL HISTORIC REVENUE	-			Schedule I-2(a), Line 6 Line 26 less Line 25
27. 28.			HISTORICAL TEST YEAR RETURN REQUESTED RETURN	(2,224)		314	Schedule III-1. Line 3
28. 29.			TOTAL REVENUE REOUIREMENT				Line 25 plus Line 28
	$\left  \right $					16,124	Line 25 plus Line 28 Schedule II-2(b), Column D, Line 8
30.			LESS: OTHER REVENUES			-	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	16,124	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			30	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
Line	Acet. Water	No. Sewer		Test Year	Changes	Test Year	Reference / Instructions
			Account Name				Schedule II-3, Columns C-E, Line 1
1. 2.	610	710	Purchased water/sewer treatment	-	-	-	
		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps Chemicals and other volume related	4,750	18,789	23,539	Schedule II-3, Columns C-E, Line 3
4.	618	718	expenses	1,315	5,203	6,518	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	-	-	-	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	13,577	26,000	39,577	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	-	-	-	Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	1,915	1,915	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-		-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	6	-	6	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	1,863	6,941	8,804	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	208	-	208	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	10,382	4,214	14,597	Schedule II-3, Columns C-E, Line 19
20.			1			-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	32,101	63,063	95,164	Add Lines 1-20
22.	40	)3	Depreciation	5,775	15,724	21,498	Schedule III-3, Column F, Line 32
23.	40		Taxes Other than Income	62	950	1,012	Schedule IV-2, Column F, Line 8
24.	409		Income Tax Expense	02	,,,,		Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	37,938	79,736		Add Lines 21-24
26.	$\vdash$	$\vdash$	TOTAL HISTORIC REVENUE	39,205	,	,->,	Schedule I-2(a), Line 6
20.			HISTORICAL TEST YEAR RETURN	1,267			Line 26 less Line 25
27.			REQUESTED RETURN	1,207		63,454	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			192,851	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			380	Schedule II-2(b), Column D, Line 8
50.			LLUU, O ITIER REVENUED			380	Line 29 less Line 30 (if line 30 is
31.			Revenue for Rate Design		(to VI, line 1)	192,471	negative, add the two lines)
32.	666	766	Regulatory (rate case) expense			317	Schedule II-11, Column D, Line 19

А	I	3	С	D	Е	F=D+E	G
				Historical	K & M	Adjusted	
T	Acet Water			Test Year	Changes	Test Year	
Line		Sewer	Account Name				Reference / Instructions
1.	610	710	Purchased water/sewer treatment	l <del>.</del>	-	Ξ.	Schedule II-3, Columns C-E, Line 1
2.		711	Sludge Removal Expense	-	-	-	Schedule II-3, Columns C-E, Line 2
3.	615.1	715.1	Power Expense-wells, booster pumps	2,287	-	2,287	Schedule II-3, Columns C-E, Line 3
4.	618	718	Chemicals and other volume related expenses	1,348	-	1,348	Schedule II-3, Columns C-E, Line 4
5.	601.1	701.1	Employee labor	-	-	-	Schedule II-3, Columns C-E, Line 5
6.	620	720	Materials	-	÷	-	Schedule II-3, Columns C-E, Line 6
7.	631-636	731-736	Contract work	28,703	17,823	46,526	Schedule II-3, Columns C-E, Line 7
8.	650	750	Transportation expenses	-	-	-	Schedule II-3, Columns C-E, Line 8
9.	664	764	Other plant maintenance	-	-	-	Schedule II-3, Columns C-E, Line 9
10.	601.2	702.2	Office salaries	-	-	-	Schedule II-3, Columns C-E, Line 10
11.	603	703	Management salaries	-	-	-	Schedule II-3, Columns C-E, Line 11
12.	604	704	Employee pensions & benefits	=	-		Schedule II-3, Columns C-E, Line 12
13.	615.8	715.8	Purchased power- G&A	-	-	-	Schedule II-3, Columns C-E, Line 13
14.	670	770	Bad debt expense	-	1,118	1,118	Schedule II-3, Columns C-E, Line 14
15.	676	776	Office services & rentals	-	-	-	Schedule II-3, Columns C-E, Line 15
16.	677	777	Office supplies & expenses	22	-	22	Schedule II-3, Columns C-E, Line 16
17.	656-659	756-759	Insurance	3,128	5,975	9,104	Schedule II-3, Columns C-E, Line 17
18.	667	767	Regulatory expense (other)	348	-	348	Schedule II-3, Columns C-E, Line 18
19.	675	775	Miscellaneous expenses	21,760	16,125	37,885	Schedule II-3, Columns C-E, Line 19
20.						-	Schedule II-3, Columns C-E, Line 20
21.			Total operating Expenses	57,598	41,041	98,639	Add Lines 1-20
22.	40	)3	Depreciation	(0)	1,946	1,946	Schedule III-3, Column F, Line 32
23.	40	)8	Taxes Other than Income	-	556	556	Schedule IV-2, Column F, Line 8
24.	409	/10	Income Tax Expense			1,749	Schedule V-1, Column C, Line 6
25.			TOTAL EXPENSES	57,598	43,543	102,889	Add Lines 21-24
26.			TOTAL HISTORIC REVENUE	37,611			Schedule I-2(a), Line 6
27.			HISTORICAL TEST YEAR RETURN	(19,987)			Line 26 less Line 25
28.			REQUESTED RETURN			9,465	Schedule III-1, Line 3
29.			TOTAL REVENUE REQUIREMENT			112,354	Line 25 plus Line 28
30.			LESS: OTHER REVENUES			-	Schedule II-2(b), Column D, Line 8
31.			Revenue for Rate Design		(to VI, line 1)	112,354	Line 29 less Line 30 (if line 30 is negative, add the two lines)
			<u>~</u>				
32.	666	766	Regulatory (rate case) expense			1,254	Schedule II-11, Column D, Line 19

Exhibit F - Schedule Workpapers Page 64 of 211

Doc Type Doc Cance Do	cument Posting [	Date	Customer/Vendor Name	BP Referei	GL Acct No.	Debit	Credit	Service Ar Service Ty	Journal Re Remarks Vi	sual Ord
A/P Invoic N	64007	5/11/2022	Coffin Renner, LLP	6079	186.001-06-020	1,337.4	1	0 TX-CSWR W&S	A/P Invoices - V00004	30
A/P Invoic N	69880	6/1/2022	Alliance Consulting Group	22-0505	186.001-06-020	708.7	′5	0 TX-CSWR W&S	A/P Invoices - V0001795	5
A/P Invoic N	74501	8/15/2022	Coffin Renner, LLP	6111	186.001-06-020	38	4	0 TX-CSWR W&S	A/P Invoices - V00004	34
A/P Invoic N	76681	8/31/2022	Coffin Renner, LLP	6068	186.001-06-020	33	6	0 TX-CSWR W&S	A/P Invoices - V0000445	5
A/P Invoic N	79297	9/13/2022	Coffin Renner, LLP	6122	186.001-06-020	1,981.9	2	0 TX-CSWR W&S	A/P Invoices - V00004	38
A/P Invoic N	81197	10/7/2022	Coffin Renner, LLP	6134	186.001-06-020	2,387.0	)6	0 CSWR-Tex W&S	A/P Invoices - V00004	33
A/P Invoic N	82032	10/31/2022	Alliance Consulting Group	22-1005	186.001-06-020	487.	.5	0 CSWR-Tex W&S	A/P Invoices - V000179	5
A/P Invoic N	83313	11/16/2022	NewGen Strategies and Solutions, LLC	14771	186.001-06-020	1,662.5	0	0 CSWR-Tex W&S	A/P Invoices - V0000466	5
A/P Invoic N	86019	11/30/2022	Alliance Consulting Group	22-1104	186.001-06-020	1,025.0	00	0 CSWR-Tex W&S	A/P Invoices - V000179	5
A/P Invoic N	85025	12/2/2022	Coffin Renner, LLP	6163	186.001-06-020	1,896.0	00	0 CSWR-Tex W&S	A/P Invoices - V000044	5
A/P Invoic N	87031	12/2/2022	Coffin Renner, LLP	6162	186.001-06-020	494.2	:6	0 CSWR-Tex W&S	A/P Invoices - V00004	32
A/P Invoic N	87424	12/16/2022	NewGen Strategies and Solutions, LLC	14930	186.001-06-020	4,387.5	0	0 CSWR-Tex W&S	A/P Invoices - V0000466	5
A/P Invoic N	88925	12/31/2022	Alliance Consulting Group	22-1203	186.001-06-020	2,397.5	0	0 CSWR-Tex W&S	A/P Invoices - V0001795	5
A/P Invoic N	89485	12/31/2022	Coffin Renner, LLP	10010	186.001-06-020	7,696.0	00	0 CSWR-Tex W&S	A/P Invoices - V000044	5

27,181.40

Exhibit F - Schedule Workpapers Page 65 of 211



Plano, TX 75074

1	nvoice
Date	Invoice #
05/31/2022	22-0505

# Ţ.

Bill To:

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Bthies@CSWRGroup.com

Brent Thies,Controller Central States Water Resources DATE RCVD<sup>07/07/22</sup> GL CODE <u>186.001</u> PRCD BY <u>Krista</u> GL DATE <u>6/1/22</u>

### TX-CSWR

	Terms		CSW2022		
	Net 30 Days	Central States Water Depr Stu	idy 2022		
Hours		Description		Rate	Amount
0.75	Dane Watson		\$	295	221.2
2.50	Rebecca Richard	ds	\$	195	487.5
	Subtotal				708.7
					\$ -
				Total	\$ 708.75

## ALLIANCE CONSULTING GROUP Professional Services May-22 Dane Watson

### **Central States Water**

<u>Date</u>	<u>Time:</u> Hours	Activity
01-May		
02-May	0.25	Set up meeting with Company
03-May		
04-May	0.50	Kick off call
05-May		
06-May		
07-May		
08-May		
09-May		
10-May		
11-May		
12-May		
13-May		
14-May		
15-May		
16-May		
17-May		
18-May		
19-May		
20-May		
21-May		
22-May		
23-May		
24-May		
25-May		
26-May		
27-May		
28-May		
29-May		
30-May		
31 <b>-</b> May		
Total	0.75	

# ALLIANCE CONSULTING GROUP Professional Services May-22 Rebecca Richards

### **Central States Water**

<u>Date</u>	<u>Time:</u> <u>Hours</u>	Activity
17-Jan	2.00	Data review & completed data request
01-May		
02-May		
03-May		
04-May	0.50	Call with Company
05-May		
06-May		
07-May		
08-May		
09-May		
10-May		
11-May		
12-May		
13-May		
14-May		
15-May		
16-May		
17-May		
18-May		
19-May		
20-May		
21-May		
22-May		
23-May		
24-May		
25-May		
26-May		
27-May		
28-May		
29-May		
30-May		
31-May		

Total 2.50

Exhibit F - Schedule Workpapers Page 69 of 211

Form (Rev. October 2018) Department of the Treasury Internal Revenue Service

1 No

# **Request for Taxpayer Identification Number and Certification**

Give Form to the requester. Do not send to the IRS.

► Go to www.irs.gov/FormW9 for instructions and the latest information.

2 Business name/disregarded entity name, if diffe	erent from above		
Alliance Consulting Group			
Check appropriate box for federal tax classificat following seven boxes.     Individual/sole proprietor or C Corpo single-member LLC			4 Exemptions (codes apply only certain entities, not individuals; se instructions on page 3):
	ification (C=C corporation, S=S corporation, P=P		Exempt payee code (if any)
LLC if the LLC is classified as a single-memb another LLC that is <b>not</b> disregarded from the is disregarded from the owner should check t	above for the tax classification of the single-mem per LLC that is disregarded from the owner unless	ber owner. Do not check s the owner of the LLC is	Exemption from FATCA reporting code (if any)
1 Other (see instructions)			
Other (see instructions) ►			
5 Address (number, street, and apt. or suite no.) S			(Applies to accounts maintained outside the U.s and address (optional)
Other (see instructions) ►			
Other (see instructions) ►     S Address (number, street, and apt. or suite no.) S     101 E. Park Blvd., Suite 220     G City, state, and ZIP code			
5 Address (number, street, and apt. or suite no.) S 101 E. Park Blvd., Suite 220			
Other (see instructions) ►     5 Address (number, street, and apt, or suite no.) S     101 E. Park Blvd., Suite 220     6 City, state, and ZIP code     Plano, TX 75074     7 List account number(s) here (optional)			
Other (see instructions) ►     S Address (number, street, and apt. or suite no.) S     101 E. Park Blvd., Suite 220     G City, state, and ZIP code     Plano, TX 75074	nber (TIN)	Requester's name a	(Applies to accounts maintained outside the U.S and address (optional)

Note: If the account is in more than one name, see the instructions for line 1. Also see What Name and Number To Give the Requester for guidelines on whose number to enter.

#### Part II Certification

Under penalties of perjury, I certify that:

- 1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and 2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
- 3. I am a U.S. citizen or other U.S. person (defined below); and

4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later

Sign Here	Signature of U.S. person ►	Dr. 11-	Date ► 1-11-22
	NAME OF COMMON	Nane Wal	

# General Instructions

Section references are to the Internal Revenue Code unless otherwise noted

Future developments. For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to www.irs.gov/FormW9.

### Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following.

Form 1099-INT (interest earned or paid)

 Form 1099-DIV (dividends, including those from stocks or mutual funds)

2 0

 Form 1099-MISC (various types of income, prizes, awards, or gross proceeds)

Employer identification number

2 0 0 1 3 1 3

- Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
- Form 1099-S (proceeds from real estate transactions)
- · Form 1099-K (merchant card and third party network transactions)
- Form 1098 (home mortgage interest), 1098-E (student loan interest), 1098-T (tuition)
- Form 1099-C (canceled debt)
- · Form 1099-A (acquisition or abandonment of secured property) Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.

If you do not return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See What is backup withholding, later


ALSAYWATER.COM

uly 26, 2022

CSWR 1630 Des Peres Rd., Suite 140 Des Peres, MO 63131

Attn: Karl Stephens

## Re: Coleto Well Reimbursement

Dear Mr. Stephens,

Per our conversation, the equipment at the Coleto well site was improperly size last year which in turn caused issues during this drought that required immediate attention and Alsay was unable to provide the services at that time.

Alsay values the relationship between CSWR and Alsay and to show our continual growth with CSWR Alsay is going to provide a \$7,500.00 credit to CSWR.

Alsay does apologize for the inconvenience that we may have caused and Alsay will continue to strive to minimize any future issues.

Cristian Rivera General Manager Alsay Incorporated

From:	Karl Stephens
То:	<u>Krista Obernuefemann</u>
Subject:	FW: Coleto - Well Reimbursement
Date:	Tuesday, July 26, 2022 5:00:37 PM
Attachments:	Dae Par
	Indecession of the
	Duct
	ima lang
	CCM andf
	pag
	iman

FYI



## **Karl Stephens**

Texas and Arkansas Regional Manager

Email: <u>Karl@cswrgroup.com</u> O: (832) 626-3570 | M: (832) 353-5236 1630 Des Peres Rd., Suite 140, Des Peres, MO 63131 **centralstateswaterresources.com** 

From: Cristian Rivera <Cristian.Rivera@alsaywater.com>
Sent: Tuesday, July 26, 2022 12:30 PM
To: Karl Stephens <karl@cswrgroup.com>
Cc: Mary Blackstock <mary.blackstock@alsaywater.com>
Subject: RE: Coleto - Well Reimbursement

Karl,

Per our conversation see attached letter.

Let me know if you have any questions.

Cristian Rivera General Manager Alsay Incorporated Cell: (832) 473-8651 Phone: (210) 628-1090 Fax: (210) 628-1505 cristian.rivera@alsaywater.com



It's all about the water

Exhibit F - Schedule Workpapers Page 72 of 211

From: Karl Stephens <<u>karl@cswrgroup.com</u>>
Sent: Tuesday, July 12, 2022 12:32 PM
To: Cristian Rivera <<u>Cristian.Rivera@alsaywater.com</u>>
Subject: Coleto - Well Reimbursement

Good Afternoon Cristian,

We are unable to apply a credit from Coleto to North Victoria, but we are able to accept general credit notification from Alsay Inc. This will allow our accounting department to reconcile the credit appropriately.



## Karl Stephens

Texas and Arkansas Regional Manager

Email: <u>Karl@cswrgroup.com</u> O: (832) 626-3570 | M: (832) 353-5236 1630 Des Peres Rd., Suite 140, Des Peres, MO 63131 **centralstateswaterresources.com** 



1	nvoice
Date	Invoice #
10/31/2022	22-100

## 101 E. Park Blvd, Suite 220 Plano, TX 75074

Bill To:

Bthies@CSWRGroup.com

Brent Thies,Controller Central States Water Resources

DATE RCV	D <sup>11/10/22</sup>	GL CODE	186.001
PRCD BY	Yvette	GL DATE	10.31.22

Billing Period	10-1-22 through 1	0-31-22			
	Terms		CSW2022		
	Net 30 Days	Central States Water Depr	Study 2022		
Hours		Description	R	ate	Amount
			\$	295	
2.50	Rebecca Richard	ds	\$	195	48
	Subtotal				48

APPROVED					
By Karl Stephens	at 2:41	рm,	Nov	29,	2022

\$

Total \$

-

487.50

-

\_

487.50

-

487.50

## ALLIANCE CONSULTING GROUP Professional Services Oct-22 Rebecca Richards

#### **Central States Water**

Date	<u>Time:</u> <u>Hours</u>	Activity
01-Oct		
02-Oct		
03-Oct		
04-Oct		
05-Oct		
06-Oct		
07-Oct		
08-Oct		
09-Oct		
10-Oct		
11-Oct		
12-Oct		
13-Oct	1.00	Data review and analysis
14-Oct		
15-Oct		
16-Oct		
17-Oct		
18-Oct		
19-Oct		
20-Oct		
21-Oct		
22-Oct		
23-Oct	1.50	Data analania
24-Oct 25-Oct	1.50	Data analysis
25-Oct 26-Oct		
20-Oct 27-Oct		
27-Oct 28-Oct		
28-Oct 29-Oct		
29-Oct 30-Oct		
31-Oct		
51-001		
Total	2.50	



Brent Thies Controller Central States Water Resources

November 7, 2022

Dear Brent:

Attached is last month's invoice for Alliance Consulting Group's work on the 2022 Central States Water Depreciation Study

It is a pleasure to work with you on this project. If you have any questions related to this invoice, please call me at (214) 473-6771.

Sincerely,

Dan Water

Dane Watson

Exhibit F - Schedule Workpapers Page 76 of 211



	nvoice
Date	Invoice #
11/30/2022	22-1104

Involoo

101 E. Park Blvd, Suite 220 Plano, TX 75074

Bill To:

Bthies@CSWRGroup.com

Brent Thies, Controller Central States Water Resources DATE RCVD<sup>12/13/22</sup> GL CODE 186.001

PRCD BY Becky Halker GL DATE 11/30/22

CSWR-Texas

	Terms		CSW2022		
	Net 30 Days	Central States Water Depr Study	<u>y</u> 2022		
Hours		Description		Rate	Amount
0.50	Dane Watson		\$	295	147.5
4.50	Rebecca Richard	ds	\$	195	877.5
			\$	80	-
					-
	Subtotal				1,025.0
	<b>ROVED</b> I Stephens at	9:21 am, Jan 06, 2023			\$ -
					φ -
				Total	\$ 1,025.00

Exhibit F - Schedule Workpapers Page 77 of 211

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## ALLIANCE CONSULTING GROUP Professional Services Nov-22 Dane Watson

#### **Central States Water**

Date	<u>Time:</u> Hours	<u>Activity</u>
01-Nov 02-Nov 03-Nov 04-Nov 05-Nov 06-Nov 07-Nov 08-Nov		
09-Nov 10-Nov 11-Nov 12-Nov 13-Nov 15-Nov 15-Nov 15-Nov 15-Nov 17-Nov 20-Nov 21-Nov 21-Nov 23-Nov 23-Nov 25-Nov 25-Nov 25-Nov 25-Nov 25-Nov 25-Nov 25-Nov 29-Nov 30-Nov 01-Dec	0.50	Call with Company
Total	0.50	

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## ALLIANCE CONSULTING GROUP Professional Services Nov-22 Rebecca Richards

#### **Central States Water**

<u>Date</u>	<u>Time:</u> <u>Hours</u>	<u>Activity</u>
01-Nov		
02-Nov		
03-Nov		
04-Nov		
05-Nov		
06-Nov		
07-Nov		
08-Nov		
09-Nov	2.50	Data review
10-Nov		
11-Nov		
12-Nov		
13-Nov		
14-Nov		
15-Nov		
16-Nov		
17-Nov	1.00	Data analysis
18-Nov		
19-Nov		
20-Nov		
21-Nov		
22-Nov	1.00	Data review and call with Client
23-Nov		
24-Nov		
25-Nov		
26-Nov		
27-Nov 28-Nov		
28-Nov 29-Nov		
29-Nov 30-Nov		
20-1100		
Total	4.50	

## **COFFIN RENNER LLP**

P. O. Box 13366 Austin, TX 78711 512-879-0900 Federal I.D. No. 27-0934461

Russell Mitten Central States Water Resources 1650 Des Peres Road Suite 303 St. Louis, MO 63131 RE: 2022 Rate Case

PRCD BY Curtis GL DATE 2/15/22

#### Fees

01/10/2022	EDJ	Research PUC precedent/rules re c	cost allocation manuals		Rate 480.00	Hours 1.10	528.00
01/11/2022	EDJ	Research PUC precedent/rules re cost allocation manuals For Current Services Rendered			480.00	1.70 2.80	816.00 1,344.00
		<u>nekeeper</u> an D. Johnson	Recapitulation <u>Hours</u> 2.80	<u>Rate</u> \$480.00	\$1,34	<u>Total</u> 4.00	
		Total Current Work					1,344.00
		Balance Due					\$1,344.00

Exhibit F - Schedule Workpapers Page 80 of 211	COFFIN RENNER LI P. O. Box 13366 Austin, TX 78711 512-879-0900	_P		
	Federal I.D. No. 27-0934461			
		<b>D</b> ]		
Russell Mitten Central States Water Resou	irces, Inc.	Statement Date: Statement No.	April 13, 2022 6068	
1650 Des Peres Road		Client No.	668.001	
Suite 303 St. Louis, MO 63131	TX-CSWR		Page: 1	
RE: 2022 Rate Case	DATE RCVD <sup>09/14/22</sup> GL CODI			
	PRCD BY Becky Halker GL DATI	<u>=</u> 8/31/22		
	Fees			
		Rate	Hours	_
-	rate case trending studies	480.00	0.70 336.00	_
For Current Servic	es renaerea		0.70 336.00	U

	Recapitulation		
Timekeeper	Hours	Rate	Total
Evan D. Johnson	0.70	\$480.00	\$336.00

Total Current Work

Balance Due

646

336.00

\$336.00

## **COFFIN RENNER LLP**

P. O. Box 13366 Austin, TX 78711 512-879-0900

Federal I.D. No. 27-0934461

	APPROVED	
Russell Mitten Central States Water Resources, Inc. 1650 Des Peres Road Suite 303 St. Louis, MO 63131	By Russ Mitten at 10:44 am, Jan 05, 20 Statement No. CSWR-Texas	23 2022 6163 668.001 Page: 1
	DATE RCVD <sup>12/06/22</sup> GL CODE <u>186.001</u>	
	PRCD BY Becky Halker GL DATE 12/2/22	

#### Fees

11/04/2022	SEF	Research re water utility rate case filing freque	ency		Rate 300.00	Hours 0.50	150.00
11/06/2022	SEF	Research re water utility rate case filing freque	Research re water utility rate case filing frequency			0.70	210.00
11/11/2022	EDJ	Analyze issues re RFP filing requirements			480.00	0.80	384.00
11/14/2022	EDJ	Analyze issues re RFP filing requirements			480.00	0.80	384.00
11/17/2022	EDJ	Analyze issues re rate filing package and timin	ıg of filing		480.00	1.00	480.00
11/22/2022	EDJ	Analyze issues re rate filing package For Current Services Rendered		480.00	0.60 4.40	288.00 1,896.00	
		Recapitu	lation				
	Ev	<u>nekeeper</u> an D. Johnson dne E. Finke	<u>Hours</u> 3.20 1.20	<u>Rate</u> \$480.00 300.00	\$1,53	<u>⊺otal</u> 6.00 0.00	

Total Current Work

**Balance Due** 

\$1,896.00

1,896.00

Exhibit F - Schedule Workpapers Page 82 of 211

## **COFFIN RENNER LLP**

P. O. Box 13366 Austin, TX 78711 512-879-0900

Federal I.D. No. 27-0934461

# APPROVED

By Russ Mitten at 2:56 pm, Jan 29, 2023

**Russell Mitten** Central States Water Resources, Inc. 1650 Des Peres Road Suite 303 St. Louis, MO 63131

RE: 2022 Rate Case

Statement Date. January 10, 2023 Statement No. 10010 Client No.

668.001 Page: 1

# DATE RCVD<sup>01/11/23</sup> GL CODE 186.001

PRCD BY Becky Halker GL DATE 12/31/22

#### Fees

12/01/2022	EDJ	Research re post-test year adjustments	Rate 480.00	Hours 1.20	576.00
12/02/2022	EDJ EDJ	Research re post-test year adjustments Analyze issues re recovery of transaction costs	480.00 480.00	1.20 1.10	576.00 528.00
12/05/2022	SEF KWN	Review STM FMV proceedings TC w/C. Ekrut, et al. re case issues	300.00 500.00	0.50 0.50	150.00 250.00
12/06/2022	EDJ KWN	Analyze issues re timing/direct testimony Analyze case issues	480.00 500.00	1.60 0.30	768.00 150.00
12/08/2022	EDJ SEF	Research re post-test year adjustments Analyze rate case issues	480.00 300.00	1.20 0.40	576.00 120.00
12/09/2022	EDJ EDJ	Analyze issues re post-test year adjustments Analyze issues re recovery of transaction costs	480.00 480.00	1.20 1.10	576.00 528.00
12/22/2022	EDJ SEF	Analyze issues re requirements for post-test year adjustments Research outstanding STM application impacts in upcoming rate case	480.00 300.00	0.80 1.50	384.00 450.00
12/27/2022	EDJ	Analyze issues re post-test year adjustments for newly acquired systems	480.00	0.80	384.00
12/28/2022	EDJ	Analyze issues re post-test year adjustments for newly acquired systems	480.00	0.60	288.00
12/29/2022	EDJ	Analyze issues re direct testimony and rate filing package requirements	480.00	1.50	720.00
12/30/2022	EDJ	Analyze issues re direct testimony and rate filing package requirements For Current Services Rendered	480.00	1.40 16.90	672.00 7,696.00

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Central States Water Resources, Inc. Account No. 668.001 RE: 2022 Rate Case Statement Date: 01/10/2023 Statement No. 10010 Page No. 2

#### Recapitulation

Timekeeper	Hours	Rate	Total
Kate Norman	0.80	\$500.00	\$400.00
Evan D. Johnson	13.70	480.00	6,576.00
Sidne E. Finke	2.40	300.00	720.00

**Total Current Work** 

Balance Due

7,696.00

\$7,696.00

Exhibit F - So Page 84 of 2	chedule Workpape 11	<sup>s</sup> DATE RCVD <sup>08/24/21</sup> GL CODE <u>183.002</u>	
NewGen		PRCD BY Krista GL DATE 8/17/21	'n
Strategies	& Solutio	ns	

275 W.Campbell Road, Suite 440 Richardson, TX 75080 Tel: 972-680-2000 Fax: 972-680-2007

Mr. Russ Mitten Central States Water Resources 1650 Des Peres Rd., Suite 303 Des Peres, MO 63131-

#### Invoice

Invoice Date: Aug 17, 2021 Invoice Num: 11793 Billing Through: Aug 15, 2021

CSWR Task 38: Terra Southwes	(CSWR STM Filings TX-RLS1916:Task 38) - Managed by (Ekrut, Christopher)	
------------------------------	---	--

Professional Services:						
Employee	Description			<u>Hours</u>	<u>Rate</u>	Amount
Christopher D. Ekrut	Professional Fee	es		0.25	\$265.00	\$66.25
Megan Kirkland	Professional Fee	es		0.25	\$130.00	\$32.50
				Το	tal Services:	\$98.75
		Project (C	CSWR STM Filings TX-RLS1916:T	ask 38) Total A	mount Due:	\$98.75
CSWR Task 39: Carroll Wate	er (CSWR STM Filings TX-RLS1)	916:Task 39) - Manage	d by (Ekrut, Christopher)			
Professional Services:						
<u>Employee</u>	Description			<u>Hours</u>	<u>Rate</u>	Amount
Megan Kirkland	Professional Fee	s		0.25	\$130.00	\$32.50
				Το	tal Services:	\$32.50
		Project (C	CSWR STM Filings TX-RLS1916:T	ask 39) Total A	mount Due:	\$32.50
CSWR Task 40: RJR (CSWR :	STM Filings TX-RLS1916:Task 4	0) - Managed by (Ekru	it, Christopher)			
Professional Services						
Professional Services: Employee	Description			Hours	Rate	Amount
Christopher D. Ekrut	Professional Fee			<u>Hours</u> 0.25	\$265.00	
Megan Kirkland	Professional Fee			0.25	\$285.00 \$130.00	\$66.25 \$32.50
Mogari Kiklana						
					tal Services:	\$98.75
		Project (C	CSWR STM Filings TX-RLS1916:T	ask 40) Total A	mount Due:	\$98.75
CSWR Task 41: Shady Grov	e (CSWR STM Filings TX-RLS1	916:Task 41) - Manage	d by (Ekrut, Christopher)			
Professional Services:						
<u>Employee</u>	<b>Description</b>			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Megan Kirkland	Professional Fee	es .		0.25	\$130.00	\$32.50
				То	tal Services:	\$32.50
		Project (C	CSWR STM Filings TX-RLS1916:T	ask 41 ) Total A	mount Due:	\$32.50
CSWR Task 42: North Orang	ge (CSWR STM Filings TX-RLS1	916:Task 42) - Manage	ed by (Ekrut, Christopher)			
Professional Services:						
Employee	Description			<u>Hours</u>	<u>Rate</u>	Amount
Megan Kirkland	Professional Fee	25		0.25	\$130.00	\$32.50
	Economics	Strategy	Stakeholders	Sustai	nability	
	economics			503101	nability	
		www.newgenstr	rategies.net			650

Exhibit F - Schedule Workpapers



275 W.Campbell Road, Suite 440 Richardson, TX 75080 Tel: 972-680-2000 Fax: 972-680-2007

#### Invoice

Invoice Date: Aug 17, 2021 Invoice Num: 11793 Billing Through: Aug 15, 2021

Mr. Russ Mitten Central States Water Resources 1650 Des Peres Rd., Suite 303 Des Peres, MO 63131-

\$32.50	Total Services:
\$32.50	Project (CSWR STM Filings TX-RLS1916:Task 42) Total Amount Due:
\$295.00	Amount Due This Invoice:
nvoice is due on 9/16/2021	This in

#### **Account Summary**

Billed To Date	Paid To Date	Balance Due
\$972.50	\$0.00	\$972.50

Economics	Strategy	Stakeholders	Sustainability
	·		

то:	Mr. Russ Mitten
From:	Chris Ekrut, Director
Date:	Aug 17, 2021
Re:	Invoice for Services Rendered through Aug 15, 2021

Attached, please find the invoice for NewGen Strategies & Solutions, LLC. for services rendered through August 15, 2021. A summary of billings, by task, is provided below. Should you have questions, please feel free to contact me at 972.232.2234

Project Name:	CSWR STM Filings
NewGen Project Number:	TX-RLS 1916
Billing Period Ending:	August 15, 2021

Task No	Task Description	Task Budget	% Complete	Billed to Date	Previously Billed	Current Billing	Budget Remaining
1	General Support Services	\$ 5,000	91%	\$ 4,541.25	\$4,541.25	\$0	\$ 458.75
2	Rocket Water Company, Inc.	2,000	100%	3,647.50	3,647.50	0	(1,647.50)
3	Oak Hills Ranch Estates Water Company	2,000	15%	293.75	293.75	0	1,706.25
4	JRM Water	2,000	61%	1,212.50	1,212.50	0	787.50
5	Abraxas Corporation	2,000	21%	420.00	420.00	0	1,580.00
6	Aero Valley Water Service	2,000	18%	355.00	355.00	0	1,645.00
7	Woodlands West	2,000	60%	1,203.75	1,203.75	0	796.25
8	Tall Pines Utility	2,000	86%	1,725.00	1,725.00	0	275.00
9	Buena Vista	2,000	35%	692.50	692.50	0	1,307.50
10	North Victoria	2,000	28%	557.50	557.50	0	1,442.50

Task No	Task Description	Task Budget	% Complete	Billed to Date	Previously Billed	Current Billing	Budget Remaining
11	Copano Heights	2,000	18%	360.00	360.00	0	1,640.00
12	Ranch Country	2,000	21%	426.25	426.25	0	1,573.75
13	Laguna Vista / Laguna Tres	2,000	15%	295.00	295.00	0	1,705.00
14	English Acres	2,000	31%	623.75	623.75	0	1,376.25
15	Copano Cove	2,000	25%	491.25	491.25	0	1,508.75
16	Council Creek	2,000	13%	262.50	262.50	0	1,737.50
17	Jones-Owens (South Silver Creek)	2,000	13%	262.50	262.50	0	1,737.50
18	Treetop Estates	2,000	11%	228.75	228.75	0	1,771.25
19	Woodland Harbor	2,000	18%	361.25	361.25	0	1,638.75
20	Shady Oaks	2,000	13%	261.25	261.25	0	1,738.75
21	Franklin County 1 & 3	2,000	11%	228.75	228.75	0	1,771.25
22	Big Wood Springs	2,000	13%	261.25	261.25	0	1,78.75
23	QV Utilities	2,000	11%	228.75	228.75	0	1,771.25
24	WaterCo	2,000	26%	621.25	621.25	0	1,378.75
25	Thousand Oaks Subdivision	2,000	20%	393.75	393.75	0	1,606.25
26	Tri-County Point POA	2,000	23%	460.00	460.00	0	1,540.00
27	Walnut Bend	2,000	26%	525.00	525.00	0	1,475.00
28	Flag Creed Ranch & Live Oak Hills	2,000	16%	327.50	327.50	0	1,672.50
29	Castlecomb	2,000	11%	228.75	228.75	0	1,771.25

Task No	Task Description	Task Budget	% Complete	Billed to Date	Previously Billed	Current Billing	Budget Remaining
30	Post Oak	2,000	28%	558.75	558.75	0	1,441.25
31	Fremont Water	2,000	20%	393.75	393.75	0	1,606.25
32	Pelican Isle	2,000	31%	626.25	626.25	0	1,373.75
33	Aransas Bay	2,000	0%	98.75	98.75	0	1,901.25
34	Lake Limestone Cove Water System, Inc.	2,000	1%	197.50	197.50	0	1,802.50
35	Leon Springs	2,000	1%	197.50	197.50	0	1,802.50
36	Texas Landing	2,000	0%	98.75	98.75	0	1,901.25
37	Patterson Water Supply	2,000	0%	98.75	98.75	0	1,901.25
38	Terra Southwest	2,000	1%	197.50	98.75	98.75	1,802.50
39	Carroll Water	2,000	1%	131.25	98.75	32.50	1,868.75
40	RJR	2,000	1%	197.50	98.75	98.75	1,802.50
41	Shady Grove	2,000	1%	131.25	98.75	32.50	1,868.75
42	North Orange	2,000	2%	315.00	282.50	32.50	1685.00
	Subtotal	\$87,000	28%	\$24,738.75	\$24,443.75	\$295.00	\$62,261.25

 From:
 Russ Mitten

 To:
 Krista Obernuefemann

 Subject:
 Fwd: CSWR August Invoice from NewGen Strategies and Solutions

 Date:
 Thursday, August 19, 2021 5:41:44 PM

 Attachments:
 CSWR STM Filings\_Invoice No. 11793\_PE 081521.pdf

Krista: Please process this invoice for payment. Thanks.

Russ Mitten General Counsel Central States Water Resources

From: Chris Ekrut <cekrut@newgenstrategies.net>
Sent: Thursday, August 19, 2021 5:04:50 PM
To: Russ Mitten <rmitten@cswrgroup.com>
Cc: Leanne Conway <lconway@newgenstrategies.net>
Subject: CSWR August Invoice from NewGen Strategies and Solutions

Russ –

Attached to this e-mail is our latest invoice associated with the STM work along with a memorandum summarizing our current status on the various task budgets.

On review, please let me know if you have any other questions or concerns.

Thanks, Chris

If needed, feel free to book time on my calendar at this link <u>https://chrisekrut.youcanbook.me/</u>

Chris Ekrut | NewGen Strategies & Solutions, LLC Chief Financial Officer Director, Environmental Practice 275 W. Campbell | Suite 440 | Richardson, TX 75080 Office: (972) 232-2234 | Mobile: (214) 498-8132 cekrut@newgenstrategies.net Please visit us at www.newgenstrategies.net

NewGen Strategies & Solution	S	275 W.Campbell Road, Suite 440 Richardson, TX 75080 Tel: 972-680-2000 Fax: 972-680-2007
Mr. Russ Mitten Central States Water Resource 1650 Des Peres Rd., Suite 303 Des Peres, MO 63131-	DATE RCVD <sup>01/11/22</sup> GL CODE <u>183.002</u> PRCD BY <u>Curtis</u> GL DATE <u>12/15/21</u>	Invoice Date: Dec 17, 2021 Invoice Num: 12363 Billing Through: Dec 15, 2021

#### CSWR Task 14: English Acres (CSWR STM Filings TX-RLS1916:Task 14) - Managed by (Ekrut, Christopher)

Exhibit F - Schedule Workpapers Page 90 of 211

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Professional Services:						
Employee	Description			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Christopher D. Ekrut	Professional Fees			0.25	\$265.00	\$66.25
Megan Kirkland	Professional Fees			0.25	\$130.00	\$32.50
				Tot	al Services:	\$98.75
		Project (	CSWR STM Filings TX-RLS1916:	Task 14) Total A	mount Due:	\$98.75
CSWR Task 29: Castlecom	b (CSWR STM Filings TX-RLS1916	:Task 29) - Manage	d by (Ekrut, Christopher)			
Professional Services:						
<u>Employee</u>	Description			Hours	<u>Rate</u>	Amount
Christopher D. Ekrut	Professional Fees			0.25	\$265.00	\$66.25
Megan Kirkland	Professional Fees			0.25	\$130.00	\$32.50
				Tol	al Services:	\$98.75
		Project (	CSWR STM Filings TX-RLS1916:	Task 29) Total A	mount Due:	\$98.75
CSWR Task 42: North Orang	ge (CSWR STM Filings TX-RLS191					<u> </u>
Professional Services:			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
	Description			Hours	Rate	Amount
Christopher D. Ekrut	Professional Fees			0.25	\$265.00	\$66.25
Chilliopher D. Ekiol	The solution of the solution o					
				101	al Services:	\$66.25
		Project (	CSWR STM Filings TX-RLS1916:	Task 42) Total A	mount Due:	\$66.25
CSWR Task 43: Cody Lewis	CSWR STM Filings TX-RLS1916:	Task 43) - Manageo	d by (Ekrut, Christopher)			
Professional Services:						
Employee	Description			Hours	<u>Rate</u>	<u>Amount</u>
Christopher D. Ekrut	Professional Fees			0.25	\$265.00	\$66.25
Megan Kirkland	Professional Fees			0.50	\$130.00	\$65.00
				Tol	al Services:	\$131.25
		Project (	CSWR STM Filings TX-RLS1916:	Task 43) Total A	mount Due:	\$131.25
CSWR Task 44: Simply Aqu	atics (CSWR STM Filings TX-RLS1	916:Task 44) - Man	aged by (Ekrut, Christoph	er)		
Professional Services:						
Employee	Description			<u>Hours</u>	<u>Rate</u>	Amount
	Economics	Strategy	Stakeholders	Sustain	ability	
	I	www.newgens	trategies.net	12		050
						656

Exhibit F - Schedule Workpapers Page 91 of 211

Central States Water Resources

1650 Des Peres Rd., Suite 303

Des Peres, MO 63131-

# ewGen ategies & Solutions

Mr. Russ Mitten

275 W.Campbell Road, Suite 440 Richardson, TX 75080 Tel: 972-680-2000 Fax: 972-680-2007

#### Invoice

Invoice Date: Dec 17, 2021 Invoice Num: 12363 Billing Through: Dec 15, 2021

CSWR Task 44: Simply Aquatics (CSWR STM Filings TX-RLS1916:Task 44) - Managed by (Ekrut, Christopher) Professional Services: <u>Employee</u> **Description** <u>Rate</u> Amount <u>Hours</u> Christopher D. Ekrut Professional Fees 0.25 \$265.00 \$66.25 Megan Kirkland Professional Fees 0.25 \$130.00 \$32.50 Total Services: \$98.75 Project (CSWR STM Filings TX-RLS1916:Task 44) Total Amount Due: \$98.75 CSWR Task 45: Knob Hill (CSWR STM Filings TX-RLS1916:Task 45) - Managed by (Ekrut, Christopher) Professional Services: <u>Employee</u> **Description** Hours <u>Rate</u> <u>Amount</u> Megan Kirkland **Professional Fees** 0.25 \$130.00 \$32.50 **Total Services:** \$32.50

> Project (CSWR STM Filings TX-RLS1916:Task 45) Total Amount Due: \$32.50 Amount Due This Invoice: \$526.25

> > This invoice is due on 1/16/2022

#### Account Summary

	/	2
Billed To Date	Paid To Date	Balance Due
\$1,693.75	\$1,167.50	\$526.25

Economics	Strategy	Stakeholders	Sustaina

Exhibit F - Schedule Workpapers Page 92 of 211

# NewGen Strategies <mark>& Solutions</mark>

Invoice

Cent 1650	russ Mitten ral States Water Resources Des Peres Rd., Suite 303 Peres, MO 63131-			Invoice Date: Dec 17, 2021 Invoice Num: 12363 Billing Through: Dec 15, 2021
Date	Name	Duration	Notes	
Project (Name) -	CSWR STM Filings TX-RLS1916:Task	<b>14 (</b> CSWR Task 14: Eng	lish Acres)	
Ekrut, Christopher				
10/25/2021	Christopher D. Ekrut	0.25	Tariff Search for Quiet Village	
	Total Ekrut, Christo	pher: 0.25		
Kirkland, Megan				
11/29/2021	Megan Kirkland		updating model	
	Total Kirkland, Me	egan: 0.25		
	Total CSWR STM Filings TX-RLS1916:Ta			
	- CSWR Task 14: English A		dia a such X	
Ekrut, Christopher	CSWR STM Filings TX-RLS1916:Task	29 (CSVVR Task 29: Cas	liecomb	
11/30/2021	Christopher D. Ekrut	0.25	Review of Updated STM Capital Structure	Models and Changes to Corp
	Total Ekrut, Christo	pher: 0.25		
Kirkland, Megan				
11/29/2021	Megan Kirkland	0.25	updating model	
	Total Kirkland, Me	egan: 0.25		
	Total CSWR STM Filings TX-RLS1916:Ta - CSWR Task 29: Castleco			
Project (Name) -	CSWR STM Filings TX-RLS1916:Task	42 (CSWR Task 42: Nor	th Orange <b>)</b>	
Ekrut, Christopher 11/30/2021	Christopher D. Ekrut	0.25	Review of Updated STM Mode Structure	els and Changes to Corp Capital
	Total Ekrut, Christo	pher: 0.25		
	Total CSWR STM Filings TX-RLS1916:Ta - CSWR Task 42: North Ora			
Project (Name) -	CSWR STM Filings TX-RLS1916:Task		dy Lewis)	
Ekrut, Christopher 11/30/2021	Christopher D. Ekrut	-		Models and Changes to Corp
	Total Ekrut, Christo	pher: 0.25	Capital situciole	
Kirkland, Megan				
11/29/2021	Megan Kirkland	0.25	CSWR STM Filing (Cody Lewis):	updating model
11/30/2021	Megan Kirkland	0.25	CSWR STM Filing (Cody Lewis	s): updating model
	Economics	Strategy	Stakeholders	Sustainability

www.newgenstrategies.net

Exhibit F - Schedule Workpapers Page 93 of 211

# NewGen Strategi rategies & Solutions

275 W.Campbell Road, Suite 440 Richardson, TX 75080 Tel: 972-680-2000 Fax: 972-680-2007

		Invoice
Mr.	Russ Mitten	Invoice Date: Dec 17, 2021
	ntral States Water Resources	Invoice Num: 12363
	0 Des Peres Rd., Suite 303	Billing Through: Dec 15, 2021
Des	Peres, MO 63131-	
Project (Name)	- CSWR STM Filings TX-RLS1916:Task 43 (CSWR 1	ask 43: Cody Lewis)
	Total Kirkland, Megan:	0.50
	Total CSWR STM Filings TX-RLS1916:Task 43 - CSWR Task 43: Cody Lewis :	0.75
Project (Name)	- CSWR 138K 43: Cody Lewis : - CSWR STM Filings TX-RLS1916:Task 44 (CSWR 1	ask 44: Simply Aquatics)
Ekrut, Christopher		
11/30/2021	Christopher D. Ekrut	0.25 Review of Updated STM Models and Changes to Corp
		Capital Structure
	Total Ekrut, Christopher:	0.25
Kirkland, Megan		
11/29/2021	Megan Kirkland	0.25 CSWR STM Filing (Simply Aquatics): updating model
	Total Kirkland, Megan:	0.25
	Total CSWR STM Filings TX-RLS1916:Task 44 - CSWR Task 44: Simply Aquatics :	0.50
Project (Name)	- CSWR STM Filings TX-RLS1916:Task 45 (CSWR 1	ask 45: Knob Hill <b>)</b>
Kirkland, Megan		
11/29/2021	Megan Kirkland	0.25 CSWR STM Filing (Knob Hill): updating model
	Total Kirkland, Megan:	0.25
	Total CSWR STM Filings TX-RLS1916:Task 45 - CSWR Task 45: Knob Hill :	0.25

то:	Mr. Russ Mitten
From:	Chris Ekrut, Director
Date:	Dec 17, 2021
Re:	Invoice for Services Rendered through Dec 15, 2021

Attached, please find the invoice for NewGen Strategies & Solutions, LLC. for services rendered through December 15, 2021. A summary of billings, by task, is provided below. Should you have questions, please feel free to contact me at 972.232.2234

Project Name:	CSWR STM Filings
NewGen Project Number:	TX-RLS 1916
Billing Period Ending:	December 15, 2021

Task No	Task Description	Task Budget	% Complete	Billed to Date	Previously Billed	Current Billing	Budget Remaining
1	General Support Services	\$ 5,000	91%	\$ 4,541.25	\$4,541.25	\$0	\$ 458.75
2	Rocket Water Company, Inc.	2,000	100%	3,647.50	3,647.50	0	(1,647.50)
3	Oak Hills Ranch Estates Water Company	2,000	15%	293.75	293.75	0	1,706.25
4	JRM Water	2,000	61%	1,212.50	1,212.50	0	787.50
5	Abraxas Corporation	2,000	21%	420.00	420.00	0	1,580.00
6	Aero Valley Water Service	2,000	18%	355.00	355.00	0	1,645.00
7	Woodlands West	2,000	60%	1,203.75	1,203.75	0	796.25
8	Tall Pines Utility	2,000	86%	1,725.00	1,725.00	0	275.00
9	Buena Vista	2,000	35%	692.50	692.50	0	1,307.50
10	North Victoria	2,000	28%	557.50	557.50	0	1,442.50

Task No	Task Description	Task Budget	% Complete	Billed to Date	Previously Billed	Current Billing	Budget Remaining
11	Copano Heights	2,000	18%	360.00	360.00	0	1,640.00
12	Ranch Country	2,000	21%	426.25	426.25	0	1,573.75
13	Laguna Vista / Laguna Tres	2,000	15%	295.00	295.00	0	1,705.00
14	English Acres	2,000	36%	722.50	623.75	98.75	1,277.50
15	Copano Cove	2,000	25%	491.25	491.25	0	1,508.75
16	Council Creek	2,000	13%	262.50	262.50	0	1,737.50
17	Jones-Owens (South Silver Creek)	2,000	13%	262.50	262.50	0	1,737.50
18	Treetop Estates	2,000	11%	228.75	228.75	0	1,771.25
19	Woodland Harbor	2,000	18%	361.25	361.25	0	1,638.75
20	Shady Oaks	2,000	13%	261.25	261.25	0	1,738.75
21	Franklin County 1 & 3	2,000	11%	228.75	228.75	0	1,771.25
22	Big Wood Springs	2,000	13%	261.25	261.25	0	1,78.75
23	QV Utilities	2,000	11%	228.75	228.75	0	1,771.25
24	WaterCo	2,000	26%	621.25	621.25	0	1,378.75
25	Thousand Oaks Subdivision	2,000	20%	393.75	393.75	0	1,606.25
26	Tri-County Point POA	2,000	23%	460.00	460.00	0	1,540.00
27	Walnut Bend	2,000	26%	525.00	525.00	0	1,475.00
28	Flag Creed Ranch & Live Oak Hills	2,000	16%	327.50	327.50	0	1,672.50
29	Castlecomb	2,000	16%	327.50	228.75	98.75	1,672.50

Task No	Task Description	Task Budget	% Complete	Billed to Date	Previously Billed	Current Billing	Budget Remaining
30	Post Oak	2,000	28%	558.75	558.75	0	1,441.25
31	Fremont Water	2,000	20%	393.75	393.75	0	1,606.25
32	Pelican Isle	2,000	31%	626.25	626.25	0	1,373.75
33	Aransas Bay	2,000	0%	98.75	98.75	0	1,901.25
34	Lake Limestone Cove Water System, Inc.	2,000	1%	197.50	197.50	0	1,802.50
35	Leon Springs	2,000	1%	197.50	197.50	0	1,802.50
36	Texas Landing	2,000	0%	98.75	98.75	0	1,901.25
37	Patterson Water Supply	2,000	0%	98.75	98.75	0	1,901.25
38	Terra Southwest	2,000	1%	197.50	197.50	0	1,802.50
39	Carroll Water	2,000	1%	131.25	131.25	0	1,868.75
40	RJR	2,000	1%	197.50	197.50	0	1,802.50
41	Shady Grove	2,000	1%	131.25	131.25	0	1,868.75
42	North Orange	2,000	19%	381.25	315.00	66.25	1,618.75
43	Cody Lewis	2,000	1%	131.25	0	131.25	1,868.75
44	Simply Aquatics	2,000	0%	98.75	0	98.75	1,901.25
45	Knob Hill	2,000	0%	32.50	0	32.50	1,967.50
	Subtotal	\$93,000	27%	\$25,265.00	\$24,738.75	\$526.25	\$67,735

# NewGen Strategies & Solutions

		Invoice
Mr. Brent Thies Central States Water Resources 500 NW Plaza #500 St. Ann, MO 63074	CSWR-Texas DATE RCVD <sup>11/21/22</sup> GL CODE <sup>186</sup> PRCD BY Becky Halker GL DATE <sup>11/1</sup>	
CSWR Rate Filing & Litigation Support (CSW Christopher)	R Rate Filing and Litigation Support TX-RLS2202:) - Manag	ged by (Ekrut,
Contract Amount: \$50,000.00	Amount Billed: \$1,662.50	Amount Remaining: \$48,337.50
Professional Services		

Employee	Description	Hours	<u>Rate</u>	<u>Amount</u>
Christopher D. Ekrut	Professional Fees	1.25	\$310.00	\$387.50
Megan Kirkland	Professional Fees	7.50	\$170.00	\$1,275.00
		Total Serv	ice Amount:	\$1,662.50
		Amount Due	This Invoice:	\$1,662.50
			This invoice is	due on 12/16/2022

# **APPROVED**

By Brent Thies at 12:46 am, Jan 16, 2023

Time Detail and Notes Follow on Next Page

Electronic Copy

Economics

Strategy Stakeholders

Exhibit F - Schedule Workpapers Page 98 of 211

# NewGen Strategies <mark>& Solutions</mark>

Mr. Brent Thies Central States Water Resources 500 NW Plaza #500 St. Ann, MO 63074

#### 275 W.Campbell Road, Suite 440 Richardson, TX 75080 Tel: 972-680-2000 Fax: 972-680-2007

Invoice

Invoice Date: Nov 16, 2022 Invoice Num: 14771 Billing Through: Nov 15, 2022

Date	Name	Duration	Notes
Project (Name) -	CSWR Rate Filing and Litigation Support TX	(-RLS2202: (CS)	NR Rate Filing & Litigation Support)
Ekrut, Christopher			
9/29/2022	Christopher D. Ekrut	0.50	Data Review
10/31/2022	Christopher D. Ekrut	0.25	Next Steps on Rate / COS App with Megan
11/10/2022	Christopher D. Ekrut	0.50	Supplemental Data Request, Data Discussion with Megan
	Total Ekrut, Christopher:	1.25	
Kirkland, Megan			
5/19/2022	Megan Kirkland	0.25	call discussing status
10/18/2022	Megan Kirkland	4.50	working on getting details connected to annual report
10/20/2022	Megan Kirkland	1.50	working on rate filing
11/2/2022	Megan Kirkland	1.00	working on schedules
11/10/2022	Megan Kirkland	0.25	going over data
	Total Kirkland, Megan:	7.50	
	Total CSWR Rate Filing and Litigation Support TX-RLS2202: - CSWR Rate Filing & Litigation Support :	8.75	

**APPROVED** By Brent Thies at 12:46 am, Jan 16, 2023

# NewGen ategies & Solutions

Mr. Brent Thies Central States Water Resources 500 NW Plaza #500 St. Ann, MO 63074



PRCD BY Becky Halker GL DATE 12/16/22

#### Invoice

Invoice Date: Dec 16, 2022 Invoice Num: 14930 Billing Through: Dec 15, 2022

**CSWR-Texas** 

#### CSWR Rate Filing & Litigation Support (CSWR Rate Filing and Litigation Support TX-RLS2202:) - Managed by (Ekrut,

Christopher)					
Contract Amour	Amount Remaining: \$43,950.00				
Professional Services					
Employee	<b>Description</b>		Hours	<u>Rate</u>	<u>Amount</u>
Christopher D. Ekrut	<b>Professional Fees</b>		2.50	\$310.00	\$775.00
Megan Kirkland	Professional Fees		21.25	\$170.00	\$3,612.50
			Total Serv	vice Amount:	\$4,387.50
			Amount Due	This Invoice:	\$4,387.50
				This invoice	e is due on 1/15/2023

Time Detail and Notes Follow on Next Page

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Exhibit F - Schedule Workpapers Page 100 of 211

# NewGen Strategies & Solutions

Mr. Brent Thies Central States Water Resources 500 NW Plaza #500 St. Ann, MO 63074

#### 275 W.Campbell Road, Suite 440 Richardson, TX 75080 Tel: 972-680-2000 Fax: 972-680-2007

#### Invoice

Invoice Date: Dec 16, 2022 Invoice Num: 14930 Billing Through: Dec 15, 2022

Date	Name	Duration	Notes
Project (Name) -	CSWR Rate Filing and Litigation Support	TX-RLS2202: (CS)	WR Rate Filing & Litigation Support)
Ekrut, Christopher			
11/18/2022	Christopher D. Ekrut	0.50	Update Call with CSWR
12/5/2022	Christopher D. Ekrut	0.75	Call with Attorneys, Internal Follow-up
12/7/2022	Christopher D. Ekrut	0.25	Review of Amended RFI, Data Review
12/9/2022	Christopher D. Ekrut	0.50	Communications on Rate Filing, Data Review
12/12/2022	Christopher D. Ekrut	0.25	Project Discussions with Megan, Clarification on Data Requests and Additional Info
12/14/2022	Christopher D. Ekrut	0.25	Project Call with Megan
	Total Ekrut, Christopher:	2.50	
Kirkland, Megan			
11/29/2022	Megan Kirkland	0.25	getting account information together
12/5/2022	Megan Kirkland	0.50	call with Evan and Kate
12/6/2022	Megan Kirkland	0.25	working on schedules
12/7/2022	Megan Kirkland	0.25	going over data needs
12/8/2022	Megan Kirkland	0.75	working on new data
12/12/2022	Megan Kirkland	1.25	working on list of system and schedules
12/13/2022	Megan Kirkland	2.50	going over systems, working on data, and call with CSWR
12/14/2022	Megan Kirkland	7.50	working on through billing data
12/15/2022	Megan Kirkland	8.00	working on through billing data
	Total Kirkland, Megan:	21.25	
	Total CSWR Rate Filing and Litigation Support TX-RLS2202: - CSWR Rate Filing & Litigation Support :	23.75	

Economics

Strategy

From:	Brent Thies
To:	Accounts Payable
Cc:	<u>Krista Obernuefemann</u>
Subject:	FW: CSWR Rate Filing & Litigation Support December Invoice from NewGen Strategies and Solutions
Date:	Monday, December 26, 2022 2:47:03 PM
Attachments:	CSWR Rate Filing & Litigation Support Invoice No 14930 PE 121522.pdf

TX rate case expense.

Brent

From: lconway@newgenstrategies.net <lconway@newgenstrategies.net>

Sent: Tuesday, December 20, 2022 12:32 PM

To: Brent Thies <bthies@cswrgroup.com>

Cc: Chris Ekrut <cekrut@newgenstrategies.net>

**Subject:** CSWR Rate Filing & Litigation Support December Invoice from NewGen Strategies and Solutions

Good afternoon,

Please find attached the CSWR Rate Filing and Litigation Support TX-RLS2202 invoice for professional services rendered from November 16, 2022 through December 15, 2022. If you have any questions or concerns regarding this invoice please let me know.

Thank you,

Leanne Conway Finance & Accounting Coordinator

NewGen Strategies and Solutions, LLC 275 W Campbell Road | Suite 440 Richardson, TX 75080

O: 972.680.2000 D: 972.590.8929

#### Exhibit F - Schedule Workpapers Page 102 of 211 275 W.Campbell Road, Suite 440 Richardson, TX 75080 NewGen Tel: 972-680-2000 Fax: 972-680-2007 trategies & Solutions Invoice Invoice Date: Dec 16, 2022 Mr. Russ Mitten Central States Water Resources Invoice Num: 14931 1650 Des Peres Rd., Suite 303 Billing Through: Dec 15, 2022 DATE RCVD<sup>12/27/22</sup> GL CODE<sup>183.002</sup> Des Peres, MO 63131-PRCD BY Becky Halker GL DATE 12/16/22 CSWR Task 53: Deer Country (CSWR STM Filings TX-RLS1916:Task 53) - Managed by (Ekrut, Christopher) Professional Services: Employee **Description** Hours Rate Amount Professional Fees Christopher D. Ekrut 0.75 \$265.00 \$198.75 **Total Services**: \$198.75 Project (CSWR STM Filings TX-RLS1916:Task 53) Total Amount Due: \$198.75 CSWR Task 54: Douglas (CSWR STM Filings TX-RLS1916:Task 54) - Managed by (Ekrut, Christopher) **Professional Services:** Employee Description Hours <u>Rate</u> Amount Christopher D. Ekrut **Professional Fees** 0.75 \$265.00 \$198.75 Total Services: \$198.75 Project (CSWR STM Filings TX-RLS1916:Task 54) Total Amount Due: \$198.75 CSWR Task 56: Valley Vista (CSWR STM Filings TX-RLS1916:Task 56) - Managed by (Ekrut, Christopher) Professional Services: Employee Description Hours <u>Rate</u> Amount Megan Kirkland **Professional Fees** 0.75 \$130.00 \$97.50 \$97.50 Total Services: Project (CSWR STM Filings TX-RLS1916:Task 56) Total Amount Due: \$97.50 CSWR Task 57: Seven Estates (Casey Homes) (CSWR STM Filings TX-RLS1916:Task 57) - Managed by (Ekrut, Christopher) Professional Services: Employee Description Hours <u>Rate</u> Amount Megan Kirkland **Professional Fees** 0.75 \$130.00 \$97.50 **Total Services:** \$97.50 \$97.50 Project (CSWR STM Filings TX-RLS1916:Task 57) Total Amount Due: CSWR Task 58: Southwest Garden (CSWR STM Filings TX-RLS1916:Task 58) - Managed by (Ekrut, Christopher) Professional Services: Description Employee Hours Rate Amount **Professional Fees** 0.75 Megan Kirkland \$130.00 \$97.50 **Total Services**: \$97.50 Project (CSWR STM Filings TX-RLS1916:Task 58) Total Amount Due: \$97.50

Economics

Stakeholders

Sustainability

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Strategy

Exhibit F - Schedule Workpapers Rage 103 of 211

Central States Water Resources

1650 Des Peres Rd., Suite 303

Des Peres, MO 63131-

# ewGen ategies & Solutions

Mr. Russ Mitten

275 W.Campbell Road, Suite 440 Richardson, TX 75080 Tel: 972-680-2000 Fax: 972-680-2007

#### Invoice

Invoice Date: Dec 16, 2022 Invoice Num: 14931 Billing Through: Dec 15, 2022

<u>Rate</u>

\$130.00

Total Services:

0.50

CSWR Task 59: Thompson Water (CSWR STM Filings TX-RLS1916:Task 59) - Managed by (Ekrut, Christopher) Professional Services: <u>Employee</u> **Description** <u>Hours</u> Professional Fees Megan Kirkland Project (CSWR STM Filings TX-RLS1916:Task 59) Total Amount Due:

CSWR Task 60: Circle R Ranchettes (CSWR STM Filings TX-RLS1916:Task 60) - Managed by (Ekrut, Christopher)

Professional Services:				
<u>Employee</u>	<b>Description</b>	Hours	<u>Rate</u>	<u>Amount</u>
Megan Kirkland	Professional Fees	0.50	\$130.00	\$65.00
		Тс	otal Services:	\$65.00
		Project (CSWR STM Filings TX-RLS1916:Task 60) Total A	Amount Due:	\$65.00
		Amount Due	This Invoice <sup>.</sup>	\$820.00

Amount Due This Invoice: \$820.00

This invoice is due on 1/15/2023

<u>Amount</u>

\$65.00 \$65.00

\$65.00

Economics	Strategy	Stakeholders	Sustainability

#### PUC DOCKET NO. 54565

#### APPLICATION OF CSWR-TEXAS UTILITY OPERATING COMPANY, LLC FOR AUTHORITY TO CHANGE RATES

#### BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

#### AFFIDAVIT OF EVAN D. JOHNSON

\$ \$ \$

§

Before me, the undersigned authority, on this date personally appeared Evan D. Johnson, known to me to be the person whose name is subscribed below, and being by me first duly sworn, stated upon oath as follows:

- 1. "My name is Evan D. Johnson. I am over 18 years of age, of sound mind, and fully competent to make this affidavit. Each statement of fact herein is true and of my own personal knowledge.
- 2. I am a partner in the Austin, Texas law firm of Coffin Renner LLP, and have practiced law in Travis County since 2008. My law practice encompasses a wide range of administrative areas, including the representation of water utilities, as well as electric, telecommunications utilities, and natural gas distribution pipelines. I have extensive experience representing and defending clients before the Public Utility Commission of Texas ("Commission") and the Railroad Commission of Texas and have participated in over 40 rate proceedings at the two agencies over the last 15 years.
- 3. I was retained by CSWR-Texas Utility Operating Company, LLC. ("CSWR-Texas" or the "Company") to serve as counsel of record in PUC Docket No. 54565.
- 4. I am familiar with Texas Water Code § 13.185 and 16 Texas Administrative Code ("TAC") § 24.44, relating to the recovery of rate case expenses.
- 5. Included in the schedule workpapers attached to this rate filing package are invoices supporting approximately \$27,181 in reasonable and necessary rate case expenses incurred by CSWR-Texas through December 31, 2022, including the work of consultants and expert witnesses in preparing CSWR-Texas's rate filing package and application. At a later date, as appropriate, CSWR-Texas will supplement that amount with the reimbursable rate case expenses incurred by CSWR-Texas throughout all subsequent stages of this docket, such as responding to discovery requests, attention to prehearing matters, preparation for an attendance at the hearing on the merits and Commission open meetings, and the drafting of pleadings.
- 6. In Docket No. 54565, my services, and the services of my firm, were associated with time and labor that were reasonable and necessary for the presentation and defense of CSWR-Texas's Rate Application. The services performed in connection with CSWR-Texas's Rate Application included the preparation of testimony and exhibits and preparation of the rate filing package.

- 7. I have reviewed the billings of Coffin Renner LLP submitted to CSWR-Texas for legal services performed in this proceeding, and I affirm that those billings accurately reflect the time spent and expenditures incurred by Coffin Renner LLP on CSWR-Texas's behalf. The calculation of the charges is correct, and there was no duplication of services and no double billing of charges.
- 8. The charges and rates of my firm are reasonable and consistent with those billed by others for similar work, and the legal rates charged by the Coffin Renner LLP attorneys that worked on this matter are comparable to rates charged by other professionals with the same level of expertise and experience and commensurate with the complexity of the issues in the proceeding. Moreover, my firm relied on and employed associated attorneys, paralegals and legal assistants to perform necessary tasks whenever possible to mitigate costs.
- 9. I have reviewed the consultant and expert witness fees and expenses and, based upon my experience in rate proceeding before this Commission in Texas, the consultant and expert witness fees and expenses are reasonable for the nature, extent, and difficulty of the work performed, the complexity of the issues presented, and as compared to similar work performed by other consultants. None of the fees paid, tasks performed, or time spent on a task were extreme or excessive.
- 10. Consistent with 16 TAC § 24.44, the rate case expenses as a whole incurred by CSWR-Texas are proportionate to the complexity and scope of the rate case. CSWR-Texas is proposing to consolidate rates and tariffs for approximately 80 separate water and wastewater systems. Novel and complex issues in this case include the fact that this is CSWR-Texas' first rate case proceeding in Texas, the number of individual systems with a separate cost of service included in the filling compared to a more typical rate case filing, the application of recently approved or amended regulations and/or rate filing requirements as well as Commission precedent, the consolidation of systems and rates and additional time and expense necessary to produce and review separate cost of service schedules and tariffs for each system on a standalone basis, the establishment of new deprecation rates based on group deprecation accounting, and the uniquely distressed nature and lack of adequate records associated with the systems CSWR-Texas has acquired and are at issue in this proceeding, which has required additional and unique analyses in order to determine the appropriate rate treatment for certain systems or costs. The amount of work, attention, and analysis needed to prepare a rate application to support CSWR-Texas's requested relief justify the amount of rate case expenses included in the application.
- 11. CSWR-Texas has not proposed treatment of any issue that has no reasonable basis in law, policy, or fact, or that was not warranted by any reasonable argument for the extension, modification, or reversal of commission precedent.
- 12. As of the signing of this affidavit, there have been no rate case expenses incurred as a result of discovery or a hearing. CSWR-Texas will request recovery of those rate case expenses, if any, at a later time and will support its request through additional evidence verified by testimony or affidavit.
13. All rate case expenses incurred for lodging, meals and beverages, transportation, or other services were reasonable and necessary. No employees of Coffin Renner LLP or any consultant charged for luxury items, entertainment, or alcoholic beverages.

Based on my review of the Rate Application and the billings from Coffin Renner LLP and all consultants, I did not identify any duplication of services or testimony.

Evan D. Johnson

SWORN AND SUBSCRIBED before me on this 31<sup>st</sup> day of January 2023.

Notary Public in and for the State of Texas

## **DOCKET NO. 52700**

§

\$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$

APPLICATION OF RJR WATER COMPANY, INC. AND CSWR-TEXAS UTILITY OPERATING COMPANY, LLC FOR SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN PARKER AND PALO PINTO COUNTIES **PUBLIC UTILITY COMMISSION** 

**OF TEXAS** 

# ORDER NO. 7 APPROVING SALE AND TRANSFER TO PROCEED

This Order addresses the application of RJR Water Company, Inc. and CSWR-Texas Utility Operating Company, LLC for the sale, transfer, or merger of facilities in Parker and Palo Pinto counties. The applicants seek approval of the following transaction: (1) sale and transfer of all facilities and service area held under RJR Water's certificate of convenience and necessity (CCN) number 12139; (2) the cancellation of RJR Water's CCN number 12139; and (3) the amendment of CSWR-Texas' CCN number 13290 to include the area previously included in RJR Water's CCN number 12139. The administrative law judge (ALJ) approves the sale and transfer and authorizes the transaction between CSWR-Texas and RJR Water to proceed and be consummated.

## I. Findings of Fact

The Commission makes the following findings of fact.

## <u>Applicant</u>

- 1. RJR Water is a Texas for profit corporation registered with the Texas secretary of state under filing number 803371238.
- 2. RJR Water operates, maintains, and controls facilities for providing water service in Parker and Palo Pinto counties under CCN number 12139.
- 3. RJR Water owns and operates a public water system that is registered with the Texas Commission on Environmental Quality (TCEQ) under identification number 1840077.
- 4. CSWR-Texas is a Texas limited liability company registered with the Texas secretary of state under file number 0803367893.

#### Order No. 7

 CSWR-Texas operates, maintains, and controls facilities for providing water service in Aransas, Austin, Burleson, Burnet, Erath, Guadalupe, Harris, Hidalgo, Hood, Llano, Lubbock, McCulloch, Parker, Victoria, Wilson, and Wood counties under CCN number 13290.

## <u>Application</u>

- 6. On October 12, 2021, RJR Water and CSWR-Texas filed the application at issue in this proceeding.
- 7. In the application, RJR Water and CSWR-Texas seek approval for the following transaction: (a) CSWR-Texas will acquire all of RJR Water's water facilities and service area under CCN number 12139; (b) RJR Water's CCN number 12139 will be cancelled; and (c) CSWR-Texas' CCN number 13290 will be amended to include the area previously included in RJR Water's CCN number 12139.
- 8. The requested area includes approximately 347 acres and 137 connections.
- 9. The requested area is located approximately four miles southwest of downtown Millsap, Texas, and is generally bounded on the north by Union Pacific Railroad Company and the Brazos River; on the east by Mountain River Road and Soda Springs Road; on the south by Soda Springs Road; and on the west by Union Pacific Railroad Company and the Brazos River.
- 10. On October 14 and November 29, 2021, and January 12, 13, and 27, 2022, CSWR-Texas supplemented the application.
- 11. On November 8, 2021, CSWR-Texas filed an errata to the application.
- 12. In Order No. 2 filed on November 15, 2021, the administrative law judge (ALJ) found the application, as supplemented, administratively complete.

# *Notice*

- On December 2, 2021, CSWR-Texas filed the affidavit of Josiah Cox, president and manager of CSWR-Texas, attesting that notice was provided to all current customers of RJR Water, neighboring utilities, and affected parties on November 30, 2021.
- 14. In Order No. 3 filed on December 29, 2021, the ALJ found the notice sufficient.

#### Order No. 7

## **Intervention**

- 15. On January 26, 2022, Quality Hill Partners, LLC filed a motion to intervene.
- 16. In Order No. 5 filed on February 16, 2022, the ALJ denied Quality Hill's motion to intervene.

## **Evidentiary Record**

- 17. On March 18, 2022, the parties filed a joint motion to admit evidence.
- 18. In Order No. 6 filed on March 25, 2022, the ALJ admitted the following evidence into the record of this proceeding: (a) the application and all attachments filed on October 12 and 13, 2021; (b) CSWR-Texas' supplement to the application filed on October 14, 2021; (c) CSWR-Texas' errata to the application filed on November 8, 2021; (d) Commission Staff's recommendation on administrative completeness filed on November 12, 2021; (e) CSWR-Texas' supplement to the application filed on November 29, 2021; (f) CSWR-Texas' affidavit of notice to current customers, neighboring utilities, and affected parties, including confidential exhibit B, filed on December 2 and 3, 2021; (g) Commission Staff's recommendation on the sufficiency of notice filed on December 22, 2021; (h) CSWR-Texas' supplemental highly sensitive attachments filed on January 12 and 13, 2022; (i) CSWR-Texas' supplemental highly sensitive attachment G and confidential attachments filed on January 27, 2022; and (j) Commission Staff's recommendation on approval of the transaction, including confidential attachments, filed on February 24, 2022.

# **Cumulative Recommendation**

19. On February 24, 2022, Commission Staff filed its recommendation regarding the transaction in this docket recommending that CSWR-Texas has the financial, managerial, and technical capability to provide continuous and adequate service to all areas included in

#### Order No. 7

this docket and in Docket Nos. 50251,<sup>1</sup> 50276,<sup>2</sup> 50311,<sup>3</sup> 50989,<sup>4</sup> 51026,<sup>5</sup> 51065,<sup>6</sup> 51118,<sup>7</sup> 51031,<sup>8</sup> 51047,<sup>9</sup> 51130,<sup>10</sup> 51146,<sup>11</sup> 51089,<sup>12</sup> 51003,<sup>13</sup> 51036,<sup>14</sup> 51222,<sup>15</sup> 51642,<sup>16</sup> 51126,<sup>17</sup> 51544,<sup>18</sup> 51928,<sup>19</sup> 51940,<sup>20</sup> 51917,<sup>21</sup> 51981,<sup>22</sup> 52089,<sup>23</sup> 52099,<sup>24</sup> and 52410.<sup>25</sup>

<sup>2</sup> Application of North Victoria Utilities, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Victoria County, Docket No. 50276, Notice of Approval (Mar. 11, 2021).

<sup>3</sup> Application of Copano Heights Water Company and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Aransas County, Docket No. 50311, Notice of Approval (Mar. 17, 2021).

<sup>4</sup> Application of Ranch Country of Texas Water Systems, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Austin County, Docket No. 50989, Notice of Approval (Apr. 23, 2021).

<sup>5</sup> Application of Tall Pines Utility, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Harris County, Docket No. 51026, Notice of Approval (Apr. 23, 2021).

<sup>6</sup> Application of Treetop Utilities, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker County, Docket No. 51065, Notice of Approval (Mar. 10, 2021).

<sup>7</sup> Application of Shady Oaks Water Supply Company, LLC and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Wilson County, Docket No. 51118, Notice of Approval (Mar. 18, 2021).

<sup>8</sup> Application of Council Creek Village, Inc. dba Council Creek Village dba South Council Creek 2 and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burnet County, Docket No. 51031, Notice of Approval (Apr. 14, 2021).

<sup>9</sup> Application of Jones-Owen Company dba South Silver Creek I, II, and III and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Travis County, Docket No. 51047, Notice of Approval (Apr. 19, 2021).

<sup>10</sup> Application of Laguna Vista Limited and Laguna Tres, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hood County, Docket No. 51130, Notice of Approval (Apr. 20, 2021).

<sup>11</sup> Application of Abraxas Corporation and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker County, Docket No. 51146, Notice of Approval (Apr. 23, 2021).

<sup>12</sup> Application of Donald E. Wilson dba Quiet Village II dba QV Utility and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger, of Facilities and Certificate Rights in Hidalgo County, Docket No. 51089, Notice of Approval (Nov. 18, 2021).

<sup>13</sup> Application of Oak Hill Ranch Estates Water Company and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Guadalupe and Wilson Counties, Docket No. 51003, Notice of Approval (Sep. 9, 2021).

<sup>14</sup> Application of Kathie Lou Daniels dba Woodlands West and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities in Burleson County, Docket No. 51036, Notice of Approval (Aug. 23, 2021).

<sup>&</sup>lt;sup>1</sup> Application of JRM Water LLC and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer, or Merger of Facilities and Certificate Rights in Victoria County, Docket No. 50251, Notice of Approval (Mar. 12, 2021).

# System Compliance

- 20. RJR Water's public water system number 1840077 has no unresolved violations listed in the TCEQ database.
- 21. CSWR-Texas has not been subject to any unresolved enforcement action by the Commission, the TCEQ, the Texas Department of Health and Human Services, the Office of the Attorney General of Texas, or the United States Environmental Protection Agency in the past five years for non-compliance with rules, orders, or state statutes.
- 22. CSWR-Texas has demonstrated a compliance history that is adequate for approval of the transaction to proceed.

<sup>18</sup> Application of Franklin Water Service Co. LLC and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Lubbock County, Docket No. 51544, Notice of Approval (Feb. 15, 2022).

<sup>19</sup> Application of Betty J. Dragoo and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Associated Acreage in Erath County, Docket No. 51928, Notice of Approval (Jan. 21, 2022).

<sup>20</sup> Application of Walnut Bend Water Supply and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer or Merger of Facilities and Certificate Rights in Angelina County, Docket No. 51940, Notice of Approval (Mar. 15, 2022).

<sup>21</sup> Application of Rocket Water Company, inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hays County, Docket No. 51917, Notice of Approval (Mar. 8, 2022).

<sup>22</sup> Application of Live Oak Hills and Flag Creek Ranch Water Systems and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Llano and McCulloch Counties, Docket No. 51981, Notice of Approval (Jan. 28, 2022).

<sup>23</sup> Application of Alpha Utility of Camp County, LLC and CSWR-Texas Operating Utility Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Camp County, Docket No. 52089 (pending).

<sup>24</sup> Application of THRC Utility, LLC and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Navarro County, Docket No. 52099 (pending).

<sup>25</sup> Application of CSWR-Texas Utility Operating Company, LLC and Leon Springs Utility Company, Inc. for Sale, Transfer, or Merger of Facilities and Certificate Rights in Bexar County, Docket No. 52410 (pending).

<sup>&</sup>lt;sup>15</sup> Application of David Petty, Executor of the Estate of Patetreen Petty Mccoy dba Big Wood Springs Water Company, and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Wood County, Docket No. 51222, Notice of Approval (Feb. 16, 2022).

<sup>&</sup>lt;sup>16</sup> Application of James L. Nelson dba WaterCo and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Montague County, Docket No. 51642, Notice of Approval (Mar. 15, 2022).

<sup>&</sup>lt;sup>17</sup> Application of Shawn M. Horvath dba Aero Valley Water Service and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and to Amend CSWR-Texas Utility Operating Company, LLC's Certificate of Convenience and Necessity in Denton County, Docket No. 51126 (pending).

# Adequacy of Existing Service

- 23. There are currently 137 connections in the requested area that are being served by RJR Water through public water system number 1840077 and such service has been continuous and adequate.
- 24. The Commission's complaint records, which date back to 2017, show no complaints against RJR Water.

# Need for Additional Service

- 25. There is a continuing need for service because RJR Water is currently providing service to 137 connections in the requested area.
- 26. There have been no specific requests for additional service with the requested area.

# Effect of Approving the Transaction and Granting the Amendment

- 27. Approving the sale and transfer to proceed and granting the CCN amendment will obligate CSWR-Texas to provide continuous and adequate water service to current and future customers in the requested area.
- 28. Utilities within a two-mile radius were noticed and no protests or requests to intervene were filed in this docket.
- 29. This application is to transfer only existing facilities, customers, and service area; therefore, there will be no effect on any other retail public utility providing service in the proximate area.
- 30. There will be no effect on landowners as the area is currently certificated.

# Ability to Serve

- 31. CSWR-Texas owns and operates 34 public water systems registered with TCEQ and does not have any active violations listed in the TCEQ database.
- 32. CSWR-Texas employs or contracts with TCEQ-licensed water operators who will operate the public water system.
- 33. CSWR-Texas has access to an adequate supply of water and is capable of providing water that meets the requirements of chapter 341 of the Texas Health and Safety Code, chapter 13 of the Texas Water Code (TWC), and the TCEQ's rules.

- 34. No additional construction is necessary for CSWR-Texas to continue providing service to the requested area.
- 35. CSWR-Texas has the technical and managerial capability to provide adequate and continuous service to the requested area.

# Ability to Serve: Financial Ability and Stability

- 36. CSWR, LLC, the immediate parent company of CSWR-Texas, is capable, available, and willing to cover temporary cash shortages, and has a debt-to-equity ratio that is less than one, satisfying the leverage test.
- 37. CSWR, LLC provided a written guarantee of coverage of temporary cash shortages, demonstrated that it has sufficient cash available to cover any projected operations and maintenance shortages in the first year five years of operations after completion of the transaction, and possesses the cash and leverage ability to pay for capital improvements and necessary equity investments, satisfying the operations test.
- 38. CSWR-Texas demonstrated the financial and managerial capability and stability to pay for the facilities necessary to provide continuous and adequate service to the requested area.

# <u>Financial Assurance</u>

39. There is no need to require CSWR-Texas to provide a bond or other financial assurance to ensure continuous and adequate service to the requested area.

# Environmental Integrity and Effect on the Land

- 40. The requested area will continue to be served with existing infrastructure.
- 41. There will be minimal effects on environmental integrity and on the land as a result of CSWR-Texas's planned upgrades, renovations, and repairs to the public water system.

# Improvement in Service or Lowering Cost to Consumers

- 42. Water service to the requested area will improve because CSWR-Texas intends to make upgrades, renovations, and repairs necessary to improve the safety and reliability of service.
- 43. The rates charged to customers in the requested area will not change as a result of the proposed transaction because CSWR-Texas will adopt RJR Water's current tariff for public water system number 1840077 upon consummation of the transaction.

# Feasibility of Obtaining Service from Adjacent Retail Public Utility

- 44. RJR Water is currently serving customers in the requested area with existing facilities and there will be no changes to land uses or existing CCN boundaries as a result of the transaction.
- 45. Obtaining service from an adjacent retail public utility would likely increase costs to customers because new facilities would need to be constructed. At a minimum, an interconnect would need to be installed in order to connect a neighboring retail public utility. Therefore, it is not feasible to obtain service from an adjacent retail public utility.

# **Regionalization or Consolidation**

46. CSWR-Texas will not need to construct a physically separate water system to continue serving the requested area; therefore, concerns of regionalization or consolidation do not apply.

# II. Conclusions of Law

The Commission makes the following conclusions of law.

- Notice of the application was provided in compliance with TWC §§ 13.246 and 13.301(a)(2), and 16 Texas Administrative Code (TAC) § 24.239(c).
- 2. After consideration of the factors in TWC § 13.246(c), CSWR-Texas demonstrated that it is capable of rendering continuous and adequate service to every customer within the requested area, as required by TWC § 13.251.
- 3. CSWR-Texas demonstrated adequate financial, managerial, and technical capability to provide adequate and continuous service to the requested area as required by TWC §§ 13.241(a) and 13.301(b).
- 4. The applicants demonstrated that the sale of Fremont's water facilities and the transfer of the sewer service area held under CCN number 20614 from RJR Water to CSWR-Texas under CCN number 13290 will serve the public interest and is necessary for the service, accommodation, convenience, or safety of the public as required by TWC §§ 13.246(b) and 13.301(d) and (e).

# **III.** Ordering Paragraphs

In accordance with these findings of fact and conclusions of law, the Commission issues the following orders:

- 1. The sale is approved and the transaction between RJR Water and CSWR-Texas may proceed and be consummated.
- 2. As soon as possible after the effective date of the transactions, but not later than 30 days after the effective date, the applicants must file proof that the transactions have been consummated and customer deposits, if any, have been addressed.
- 3. RJR Water and CSWR-Texas have 180 days to complete the transaction.
- 4. Under 16 TAC § 24.239(m), if the transactions are not consummated within this 180-day period, or an extension has not been granted, this approval is void and RJR Water and CSWR-Texas will have to reapply for approval.
- 5. The applicants are advised that the RJR Water sewer system and corresponding service area will remain under CCN number 20614 and be held by RJR Water until the sale and transfer transaction is complete in accordance with Commission rules.
- 6. In an effort to finalize this case as soon as possible, the applicants must continue to file monthly updates regarding the status of the closing and submit documents evidencing that the transactions were consummated.
- 7. Within 15 days following the filing of the applicants' proof that the transactions have been consummated and customer deposits, if any, have been addressed, Commission Staff must file a recommendation regarding the sufficiency of the documents and propose a schedule for continued processing of this docket.

Signed at Austin, Texas the 12th day of April, 2022.

PUBLIC UTILITY COMMISSION OF TEXAS

X S.1.

GREGORY R. SIEMANKOWSKI ADMINISTRATIVE LAW JUDGE

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## **DOCKET NO. 53238**

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APPLICATION OF SIMPLY AQUATICS, INC. AND CSWR-TEXAS UTILITY OPERATING COMPANY, LLC FOR SALE, TRANSFER OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN MONTGOMERY, SABINE AND SAN AUGUSTINE COUNTIES

### **PUBLIC UTILITY COMMISSION**

**OF TEXAS** 

# ORDER NO. 8 APPROVING SALE AND TRANSFER TO PROCEED

This Order addresses the application of Simply Aquatics, Inc. and CSWR-Texas Utility Operating Company, LLC for approval of the sale, transfer, or merger of facilities and certificate rights in Montgomery, Sabine, and San Augustine counties. The applicants seek approval of the sale and transfer of all facilities and service areas held under Simply Aquatics's certificate of convenience and necessity (CCN) number 13259 to CSWR-Texas, the cancellation of Simply Aquatics's CCN number 13259, and the amendment of CSWR-Texas's CCN number 13290 to include the areas previously included in Simply Aquatics's CCN number 13259. The administrative law judge (ALJ) approves the transaction between Simply Aquatics and CSWR-Texas and the transaction may be completed as proposed.

### I. Findings of Fact

The Commission makes the following findings of fact.

## <u>Applicants</u>

- 1. Simply Aquatics is a Texas corporation registered with the Texas secretary of state under file number 800198192.
- Simply Aquatics operates, maintains, and controls facilities for providing water service in Montgomery, Sabine, and San Augustine counties under CCN number 13259.
- Simply Aquatics owns and operates public water systems registered with the Texas Commission on Environmental Quality (TCEQ) under the following names and identification numbers: Vista Verde, 1700694; El Pinon Estates, 2030013; La Playa Subdivision, 2030015; and Timberlane, 2020054.

- 4. CSWR-Texas is a Texas limited liability company registered with the Texas secretary of state under file number 803367893.
- CSWR-Texas operates, maintains, and controls facilities for providing water service in Angelina, Aransas, Austin, Burleson, Burnet, Camp, Erath, Guadalupe, Harris, Hays, Hidalgo, Hood, Kerr, Llano, Lubbock, McCulloch, Montague, Navarro, Parker, Victoria, Wilson, and Wood counties under CCN number 13290.

# <u>Application</u>

- 6. On February 17, 2022, CSWR-Texas and Simply Aquatics filed the application at issue in this proceeding.
- 7. The applicants supplemented the application on February 25, March 28, 29, and 30, April 19, May 9, and June 14 and 20, 2022.
- 8. CSWR-Texas filed an errata to the application on March 18, 2022.
- 9. CSWR-Texas filed a second errata to the application on March 29, 2022.
- 10. In the application, as supplemented, the applicants seek approval of the following transaction: (a) CSWR-Texas will acquire all of Simply Aquatics's water service areas and facilities held under CCN number 13259; (b) Simply Aquatics's CCN number 13259 will be cancelled; and (c) CSWR-Texas's CCN number 13290 will be amended to include the areas previously included in Simply Aquatics's CCN number 13259.
- 11. The requested areas collectively comprise approximately 523 acres and 254 customer connections.
- 12. The requested areas are comprised of the following four water systems:
  - a. The El Pinon Estates public water system in San Augustine County, which includes 88 customer connections, is located approximately ten miles southwest of downtown Pineland, Texas, and is generally bounded on the north by a line parallel to and approximately 110 feet north of County Road 900; on the east by a line parallel to and approximately 110 feet east of County Road 485; on the south by a line parallel to and approximately 120 feet south of County Road 900; and on the west by a line parallel to and approximately 120 feet south of County Road 900.
  - b. The La Playa public water system in San Augustine County, which includes 28 customer connections, is located approximately five miles south of downtown

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Broadus, Texas, and is generally bounded on the north by County Road 4717 and County Road 4715 south; on the east by a line parallel to and approximately 0.6 miles west of County Road 427; on the south by Sam Rayburn Reservoir; and on the west by Sam Rayburn Reservoir.

- c. The Vista Verde public water system in Montgomery County, which includes 82 customer connections, is located approximately 3.4 miles southeast of downtown Montgomery, Texas, and is generally bounded on the north by a line parallel to and approximately 0.5 miles south of Lake Conroe; on the east by South Pine Lake Road; on the south by Mail Route Road; and on the west by a line parallel to and approximately 170 feet west of Shadow Lane.
- d. The Timberlane public water system in Sabine County, which includes 47 customer connections, is located approximately 11 miles southeast of downtown Hemphill, Texas, and is generally bounded on the north by Toledo Bend Reservoir; on the east by a line perpendicular to Oakhill Road; on the south by Toledo Reservoir Bend; and on the west by Toledo Bend Reservoir.
- 13. In Order No. 2 filed on March 23, 2022, the ALJ found the application, as supplemented, administratively complete.

# *Notice*

- 14. On July 8, 2022, CSWR-Texas filed the corrected affidavit of Aaron Silas, regulatory case manager of CSWR-Texas, attesting that notice was provided to all current customers, neighboring utilities, and affected parties on May 23, 2022.
- 15. In Order No. 6 filed on July 12, 2022, the ALJ found notice sufficient.

# **Evidentiary Record**

In Order No. 7 filed on September 21, 2022, the ALJ admitted the following evidence into the record: (a) the application and all attachments filed on February 17, 2022; (b) CSWR-Texas's first supplement to the application filed on February 25, 2022; (c) CSWR-Texas's first errata to the application filed on March 18, 2022; (d) Commission Staff's recommendation on administrative completeness filed on March 21, 2022; (e) CSWR-Texas's supplemental attachment G to the application filed on March 28, 2022; (f) CSWR-Texas's second errata and third supplement to the application filed on March 29 and 30, 2022; (g) CSWR-Texas's supplemental attachments F and G to the application

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filed on April 19, 2022; (h) CSWR-Texas's supplemental attachment G to application filed on May 9, 2022; (i) CSWR-Texas's supplemental attachment B to the application filed on June 14, 2022; (j) CSWR-Texas's supplemental attachment G-1 to the application filed on June 20, 2022; (k) CSWR-Texas's affidavit of notice to current customers, neighboring utilities, and affected parties, including confidential exhibit B, filed on June 2, 2022; (*l*) Commission Staff's supplemental recommendation on sufficiency of notice filed on July 5, 2022; (m) CSWR-Texas's corrected affidavit of notice filed on July 8, 2022; and (n) Commission Staff's recommendation on approval of the transaction, including confidential attachments, filed on August, 25, 2022.

# **Cumulative Recommendation**

17. On August 25, 2022, Commission Staff filed its recommendation regarding the transaction in this docket recommending that CSWR-Texas has the financial, managerial, and technical capability to provide continuous and adequate service to all areas included in this docket and in Docket Nos. 50251,<sup>1</sup> 50276,<sup>2</sup> 50311,<sup>3</sup> 50989,<sup>4</sup> 51003, <sup>5</sup>51026,<sup>6</sup> 51031,<sup>7</sup>

<sup>&</sup>lt;sup>1</sup> Application of JRM Water LLC and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Victoria County, Docket No. 50251, Notice of Approval (Mar. 12, 2021).

<sup>&</sup>lt;sup>2</sup> Application of North Victoria Utilities, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Victoria County, Docket No. 50276, Notice of Approval (Mar. 11, 2021).

<sup>&</sup>lt;sup>3</sup> Application of Copano Heights Water Company and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Aransas County, Docket No. 50311, Notice of Approval (Mar. 17, 2021).

<sup>&</sup>lt;sup>4</sup> Application of Ranch Country of Texas Water Systems, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Austin County, Docket No. 50989, Notice of Approval (Apr. 23, 2021).

<sup>&</sup>lt;sup>5</sup> Application of Oak Hill Ranch Estates Water and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Guadalupe and Wilson Counties, Docket No. 51003 Notice of Approval (Aug. 9, 2021).

<sup>&</sup>lt;sup>6</sup> Application of Tall Pines Utility, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Harris County, Docket No. 51026, Notice of Approval (Apr. 23, 2021).

<sup>&</sup>lt;sup>7</sup> Application of Council Creek Village, Inc. dba Council Creek Village dba South Council Creek 2 and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burnet County, Docket No. 51031, Notice of Approval (Apr. 14, 2021).

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51036,<sup>8</sup> 51047,<sup>9</sup> 51065,<sup>10</sup> 51089,<sup>11</sup> 51118,<sup>12</sup> 51126,<sup>13</sup> 51130,<sup>14</sup> 51146,<sup>15</sup> 51222,<sup>16</sup> 51544,<sup>17</sup> 51642,<sup>18</sup> 51917,<sup>19</sup> 51928,<sup>20</sup> 51940,<sup>21</sup> 51981,<sup>22</sup> 52089,<sup>23</sup> 52099,<sup>24</sup> 52410,<sup>25</sup> 52661,<sup>26</sup> 52700,<sup>27</sup> 52702,<sup>28</sup> 52803,<sup>29</sup> 52879,<sup>30</sup> 52880,<sup>31</sup> 53317,<sup>32</sup> 53326,<sup>33</sup> 53259,<sup>34</sup> and 53429.<sup>35</sup>

<sup>9</sup> Application of Jones-Owen Company dba South Silver Creek I, II, and III and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burnet County, Docket No. 51047, Notice of Approval (Apr. 19, 2021).

<sup>10</sup> Application of Treetop Utilities, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker County, Docket No. 51065, Corrected Notice of Approval (Mar. 10, 2021).

<sup>11</sup> Application of Donald E. Wilson dba Quiet Village II dba QV Utility CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hidalgo County, Docket No. 51089, Notice of Approval (Nov. 18, 2021).

<sup>12</sup> Application of Shady Oaks Water Supply Company, LLC and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Wilson County, Docket No. 51118, Notice of Approval (Mar. 18, 2021).

<sup>13</sup> Application of Shawn M. Horvath dba Aero Valley Water Service and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer, Or Merger of Facilities and to Amend CSWR-Texas Utility Operating Company, LLC's Certificate of Convenience and Necessity in Denton County, Docket No. 51126 (pending).

<sup>14</sup> Application of Laguna Vista Limited and Laguna Tres, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hood County, Docket No. 51130, Notice of Approval (Apr. 20, 2021).

<sup>15</sup> Application of Abraxas Corporation and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker County, Docket No. 51146, Notice of Approval (Apr. 23, 2021).

<sup>16</sup> Application of the Estate of Patetreen Petty McCoy dba Big Wood Springs Water Company and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Wood County, Docket No. 51222, Notice of Approval (Feb. 16, 2022).

<sup>17</sup> Application of Franklin Water Service Co. LLC and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer, Or Merger of Facilities and Certificate Rights in Lubbock County, Docket No. 51544, Notice of Approval (Feb. 15, 2022).

<sup>18</sup> Application of James L. Nelson dba WaterCo and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Montague County, Docket No. 51642, Notice of Approval (Mar. 15, 2022).

<sup>19</sup> Application of Rocket Water Company, Inc. and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer, Or Merger of Facilities and Certificate Rights in Hays County, Docket No. 51917, Notice of Approval (Mar. 8, 2022).

<sup>20</sup> Application of Betty J. Dragoo and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer, or Merger of Facilities and Associated Acreage in Erath County, Docket No. 51928, Notice of Approval (Jan. 21, 2022).

<sup>21</sup> Application of Walnut Bend Water Supply and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer or Merger of Facilities and Certificate Rights in Angelina County, Docket No. 51940, Notice of Approval (Mar. 15, 2022).

<sup>&</sup>lt;sup>8</sup> Application of Kathie Lou Daniels dba Woodlands West and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burleson County, Docket No. 51036, Notice of Approval (Aug. 23, 2021).

### CSWR-Texas's Compliance History

18. CSWR-Texas has not been under enforcement action by the Commission, TCEQ, Texas Health and Human Services, the Office of the Texas Attorney General, or the United States Environmental Protection Agency in the past five years for non-compliance with rules, orders, or state statutes.

<sup>23</sup> Application of Alpha Utility of Camp County, LLC and CSWR-Texas utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Camp County, Docket No. 52089, Notice of Approval (Mar. 25, 2022).

<sup>24</sup> Application of THRC Utility, LLC and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Navarro County, Docket No. 52099, Corrected Notice of Approval (Jul. 28, 2022).

<sup>25</sup> Application of CSWR-Texas Utility Operating Company, LLC and Leon Springs Utility Co., Inc. for Sale, Transfer, or Merger of Facilities and Certificate Rights in Bexar County, Docket No. 52410, Notice of Approval (Jun. 3, 2022).

<sup>26</sup> Application of Tri-County Point Property Owners Association and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Calhoun and Jackson Counties, Docket No. 52661 (pending).

<sup>27</sup> Application of RJR Water Company and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker and Palo Pinto Counties, Docket No. 52700 (pending).

<sup>28</sup> Application of CSWR-Texas Utility Operating Company, LLC and Fremont Water Company for Saale, Transfer, or Merger of Facilities and Certificate Rights in Kerr County, Docket No. 52702, Notice of Approval (Aug. 5, 2022).

<sup>29</sup> Application of Copano Cove Water Company, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate rights in Aransas County, Docket No. 52803 (pending).

<sup>30</sup> Application of Carroll Water Company, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Ellis County, Docket No. 52879 (pending).

<sup>31</sup> Application of Texas Landing Utilities and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Polk and Montgomery Counties, Docket No. 52880 (pending).

<sup>32</sup> Application of CSWR-Texas Utility Operating Company, LLC and Jusryn Company, Inc. dba Shady Grove Sewer System for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hood County, Docket No. 53317 (pending).

<sup>33</sup> Application of CSWR-Texas Utility Operating Company, LLC and Aransas Bay Utilities Co., LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Aransas County, Docket No. 53326 (pending).

<sup>34</sup> Application of CSWR-Texas Utility Operating Company, LLC and Cody and Anita Lewis dba Cassie Water Company for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burnet County, Docket No. 53259 (pending).

<sup>35</sup> Application of CSWR-Texas Utility Operating Company, LLC and Deer Springs Water Company for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burnet County, Docket No. 53429 (pending).

<sup>&</sup>lt;sup>22</sup> Application of Live Oak Hills and Flag Creek Ranch Water Systems and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Llano and McCulloch Counties, Docket No. 51981, Notice of Approval (Jan. 28, 2022).

- 19. CSWR-Texas does not have a history of continuing mismanagement or misuse of revenues as a utility service provider.
- 20. CSWR-Texas demonstrated a compliance history that is adequate for approval of the transaction to proceed.

# Adequacy of Existing Service

- 21. There are currently 254 connections in the requested areas that are being served by Simply Aquatics through public water system numbers 1700694, 2030013, 2030015, and 2020054, and such service has been continuous.
- 22. Simply Aquatics has active violations listed in the TCEQ database, including violations alleging inadequate capacity.
- 23. CSWR-Texas plans to make upgrades, renovation and repairs to the public water systems to address the violations and return the systems to compliance.
- 24. The Commission's complaint records, which date back to 2017, show five complaints against Simply Aquatics.
- 25. There is no evidence in the record that Simply Aquatics has failed to comply with any Commission or TCEQ order.

# <u>Need for Additional Service</u>

- 26. There are currently 254 customer connections in the requested areas that are receiving service from Simply Aquatics and have an ongoing need for service.
- 27. This is an application to transfer only existing facilities, customers, and service areas.
- 28. There is no evidence of specific requests for additional service within the requested areas.

# Effect of Approving the Transaction and Granting the Amendment

- 29. Approving the sale and transfer to proceed and granting the CCN amendment will obligate CSWR-Texas to provide continuous and adequate water service to current and future customers in the requested areas.
- 30. Because this application is to transfer only existing facilities, customers, and service areas, there will be no effect on any other retail public utility servicing the proximate areas.

31. There will be no effect on landowners in the requested areas because the requested areas are currently certificated.

# Ability to Serve: Managerial and Technical

- 32. CSWR-Texas owns and operates 34 public water systems registered with TCEQ and does not have any active violations listed in the TCEQ database.
- 33. The Commission's complaint records, which date back to 2017, show 12 complaints against CSWR-Texas.
- 34. CSWR-Texas employs or contracts with TCEQ-licensed operators who will operate public water system numbers 1700694, 2030013, 2030015, and 2020054.
- 35. No additional construction is necessary for CSWR-Texas to provide service to the requested areas.
- 36. After completion of the planned upgrades, renovation and repairs to the water systems, CSWR-Texas will have access to an adequate supply of water and will be capable of providing drinking water that meets the requirements of chapter 341 of the Texas Health and Safety Code, chapter 13 of the Texas Water Code (TWC), and the TCEQ's rules.
- 37. CSWR-Texas has the technical and managerial capability to provide continuous and adequate service to the requested areas.

# Feasibility of Obtaining Service from Adjacent Retail Public Utility

- 38. Simply Aquatics is currently providing service to customers and such service has been continuous and adequate.
- 39. Obtaining service from an adjacent retail public utility would likely increase costs to customers because new facilities will need to be constructed. At a minimum, an interconnection would need to be installed in order to connect to an adjacent retail public utility.
- 40. It is not feasible to obtain service from an adjacent retail public utility.

# **Regionalization or Consolidation**

41. The construction of a physically separate system is not necessary for CSWR-Texas to serve the requested areas. Therefore, consideration of regionalization or consolidation is not required.

## Ability to Serve: Financial Ability

- 42. CSWR, LLC, the immediate parent company of CSWR-Texas, is capable, available, and willing to cover temporary cash shortages, and has a debt-to-equity ratio that is less than one, satisfying the leverage test.
- 43. CSWR, LLC provided a written guarantee of coverage of temporary cash shortages and demonstrated that it has sufficient cash available to cover any projected operations and maintenance shortages in the first year five years of operations after completion of the transaction and possesses the cash and leverage ability to pay for capital improvements and necessary equity investments, satisfying the operations test.
- 44. CSWR-Texas demonstrated the financial capability and stability to pay for the facilities necessary to provide continuous and adequate service to the requested areas.

## Financial Assurance

45. There is no need to require CSWR-Texas to provide a bond or other financial assurance to ensure continuous and adequate service.

## Environmental Integrity and Effect on the Land

- 46. The requested areas will continue to be served with existing infrastructure.
- 47. There will be minimal effects on environmental integrity and on the land as a result of CSWR Texas's planned upgrades, renovation and repairs to the water systems.

## Improvement of Service or Lowering Cost to Customers

- 48. Reliability and quality of water is expected to improve under CSWR-Texas's management.
- 49. The rates charged to customers in the requested areas will not change as a result of the proposed transaction because CSWR-Texas will adopt the currently in effect tariff for the water systems upon consummation of the transaction.

## **II.** Conclusions of Law

The Commission makes the following conclusions of law.

1. The applicants provided notice of the application that complies with TWC §§ 13.246 and 13.301(a)(2) and 16 Texas Administrative Code (TAC) § 24.239(a) through (c).

- After consideration of the factors in TWC § 13.246(c), CSWR-Texas demonstrated that it is capable of rendering continuous and adequate service to every customer within the requested areas, as required by TWC § 13.251.
- CSWR-Texas demonstrated adequate financial, managerial, and technical capability for providing continuous and adequate service to the requested areas as required by TWC §§ 13.241(a) and 13.301(b).
- 4. The applicants demonstrated that the sale and transfer of CCN number 13259 and its associated facilities and service areas to CSWR-Texas will serve the public interest and is necessary for the continued service, accommodation, convenience, and safety of the public under TWC §§ 13.246(b) and 13.301(d) and (e).

# **III. Ordering Paragraphs**

In accordance with these findings of fact and conclusions of law, the Commission issues the following orders.

- 1. The transaction between CSWR-Texas and Simply Aquatics in this proceeding is approved and may be completed as proposed.
- 2. As soon as possible after the effective date of the transaction, but not later than 30 days after the effective date, the applicants must file proof that the transaction has been completed and customer deposits, if any, have been addressed.
- 3. The applicants have 180 days from the date of this Order to complete the transaction.
- 4. Under 16 TAC § 24.239(m), if the transaction is not completed within this 180-day period and no extension has been granted, this approval is void and the applicants will have to reapply for approval.
- 5. The applicants are advised that CCN number 13259, and the associated facilities and service areas, will continue to be held by Simply Aquatics until the final order or notice of approval is issued in this matter, in accordance with Commission rules.
- 6. In an effort to finalize this case as soon as possible, the applicants must continue to file monthly updates regarding the status of the closing and submit documents evidencing that the transaction was completed.

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### **Docket No. 53238**

7. Within 15 days following the filing of the applicants' proof that the transaction has been completed and customer deposits, if any, have been addressed, Commission Staff must file a recommendation regarding the sufficiency of the documents and propose a schedule for continued processing of this docket.

# Signed at Austin, Texas the 20<sup>th</sup> day of September 2022.

# PUBLIC UTILITY COMMISSION OF TEXAS

Ausan E. Doodson

# SUSAN E. GOODSON ADMINISTRATIVE LAW JUDGE

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## **DOCKET NO. 53259**

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§

APPLICATION OF CSWR-TEXAS UTILITY OPERATING COMPANY LLC AND CODY AND ANITA LEWIS DBA CASSIE WATER COMPANY FOR SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN BURNET COUNTY **PUBLIC UTILITY COMMISSION** 

**OF TEXAS** 

# ORDER NO. 8 APPROVING SALE AND TRANSFER TO PROCEED

This Order addresses the application of CSWR-Texas Utility Operating Company, LLC and Cody and Anita Lewis dba Cassie Water Company for the sale, transfer, or merger of facilities of facilities and certificate rights in Burnet County. The applicants seek approval of the sale and transfer of all facilities and service area held under Cassie Water's certificate of convenience and necessity (CCN) number 11663 to CSWR-Texas, the cancellation of Cassie Water's CCN number 11663, and the amendment of CSWR-Texas's CCN number 13290 to include the area previously included in Cassie Water's CCN number 11663. The administrative law judge (ALJ) approves the transaction between CSWR-Texas and Cassie Water and the transaction may be completed as proposed.

### I. Findings of Fact

The Commission makes the following findings of fact.

#### <u>Applicants</u>

- 1. CSWR-Texas is a Texas limited liability company registered with the Texas secretary of state under file number 803367893.
- CSWR-Texas operates, maintains, and controls facilities for providing water service in Angelina, Aransas, Austin, Burleson, Burnet, Camp, Erath, Guadalupe, Harris, Hays, Hidalgo, Hood, Kerr, Llano, Lubbock, McCulloch, Montague, Navarro, Parker, Victoria, Wilson, and Wood counties under CCN number 13290.
- 3. Cody and Anita Lewis are individuals doing business as Cassie Water Company.

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### Docket No. 53259

- Cassie Water operates, maintains, and controls facilities for providing water service in Burnet County under CCN number 11663.
- 5. Cassie Water owns and operates a public water system registered with the Texas Commission on Environmental Quality (TCEQ) under identification number 0270047.

# <u>Application</u>

- 6. On February 22, 2022, CSWR-Texas and Cassie Water Company, Deer Springs Water Company, and Water Works I and II filed an application for the sale, transfer, or merger of facilities and certificate rights in Burnet and Llano counties.
- CSWR-Texas supplemented the application on February 25, March 28, April 5, 6, and 19, May 9, and June 14 and 20, 2022.
- In Order No. 2 filed on April 4, 2022, the ALJ severed the application into three dockets: Docket Nos. 53429<sup>1</sup> and 53430<sup>2</sup> and the present docket, which addresses the transaction between CSWR-Texas and Cassie Water.
- 9. In the application, as severed, the applicants seek approval of the following transaction:
  (a) CSWR-Texas will acquire all of Cassie Water's water service area and water facilities held under CCN number 11663; (b) Cassie Water's CCN number 11663 will be cancelled; and (c) CSWR-Texas's CCN number 13290 will be amended to include the area previously included in Cassie Water's CCN number 11663.
- 10. The requested area includes approximately 58 acres and 67 customer connections.
- 11. The requested area is located approximately 10.5 miles west of downtown Burnet, Texas, and is generally bounded on the north by Lake Buchanan; on the east by Ranch-to-Market Road 690; on the south by Lake Buchanan; and on the west by Lake Buchanan.
- 12. In Order No. 4 filed on May 9, 2022, the ALJ found the application, as supplemented and severed, administratively complete.

<sup>&</sup>lt;sup>1</sup> Application of CSWR-Texas Utility Operating Company, LLC and Deer Springs Water Company for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burnet County, Docket No. 53429 (pending).

<sup>&</sup>lt;sup>2</sup> Application of CSWR-Texas Utility Operating Company, LLC and Water Works I and II for Sale, Transfer, or Merger of Facilities and Certificate Rights in Llano County, Docket No. 53430 (pending).

#### Order No. 8

# <u>Notice</u>

- 13. On June 6, 2020, CSWR-Texas filed the affidavit of Aaron Silas, regulatory case manager of CSWR-Texas, attesting that notice was provided to all current customers neighboring utilities, and affected parties on May 20, 2022.
- 14. In Order No. 5 filed on June 23, 2022, the ALJ found notice sufficient.

# Evidentiary Record

15. In Order No. 7 filed on August 15, 2022, the ALJ admitted the following evidence into the record: (a) the application, including confidential attachments, filed on February 22, 2022; (b) CSWR-Texas's first supplement to the application filed on February 25, 2022; (c) CSWR-Texas's supplemental attachment G to the application, including highly sensitive attachment, filed on March 28, 2022; (d) Commission Staff's unopposed motion to sever filed on March 29, 2022; (e) CSWR-Texas's third supplement and confidential attachment to the application, filed on April 5 and 6, 2022; (f) CSWR-Texas's supplemental attachments F and G to the application, including highly sensitive attachment, filed on April 19, 2022; (g) Commission Staff's recommendation on administrative completeness filed on May 6, 2022; (h) CSWR-Texas's supplement to application, including highly sensitive attachment, filed on May 9, 2022; (i) CSWR-Texas's affidavit of notice to current customers, neighboring utilities, and affected parties, including confidential exhibit B, filed on June 6, 2022; (j) CSWR-Texas's supplemental attachment B to application filed on June 14, 2022; (k) CSWR-Texas's supplemental attachment G-1 to the application filed on June 20, 2022; (1) Commission Staff's recommendation on the sufficiency of notice filed on June 22, 2022; and (m) Commission Staff's recommendation on approval of the transaction, including confidential attachments, filed on July 29, 2022.

### **Cumulative Recommendation**

16. On July 29, 2022, Commission Staff filed its recommendation regarding the transaction in this docket recommending that CSWR-Texas has the financial, managerial, and technical capability to provide continuous and adequate service to all areas included in this docket and in Docket Nos. 50251,<sup>3</sup> 50276,<sup>4</sup> 50311,<sup>5</sup> 50989,<sup>6</sup> 51003, <sup>7</sup>51026,<sup>8</sup> 51031,<sup>9</sup> 51036,<sup>10</sup>

<sup>5</sup> Application of Copano Heights Water Company and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Aransas County, Docket No. 50311, Notice of Approval (Mar. 17, 2021).

<sup>6</sup> Application of Ranch Country of Texas Water Systems, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Austin County, Docket No. 50989, Notice of Approval (Apr. 23, 2021).

<sup>7</sup> Application of Oak Hill Ranch Estates Water and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Guadalupe and Wilson Counties, Docket No. 51003 Notice of Approval (Aug. 9, 2021).

<sup>8</sup> Application of Tall Pines Utility, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Harris County, Docket No. 51026, Notice of Approval (Apr. 23, 2021).

<sup>9</sup> Application of Council Creek Village, Inc. dba Council Creek Village dba South Council Creek 2 and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burnet County, Docket No. 51031, Notice of Approval (Apr. 14, 2021).

<sup>&</sup>lt;sup>3</sup> Application of JRM Water LLC and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Victoria County, Docket No. 50251, Notice of Approval (Mar. 12, 2021).

<sup>&</sup>lt;sup>4</sup> Application of North Victoria Utilities, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Victoria County, Docket No. 50276, Notice of Approval (Mar. 11, 2021).

<sup>&</sup>lt;sup>10</sup> Application of Kathie Lou Daniels dba Woodlands West and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burleson County, Docket No. 51036, Notice of Approval (Aug. 23, 2021).

#### Order No. 8

51047,<sup>11</sup> 51065,<sup>12</sup> 51089,<sup>13</sup> 51118,<sup>14</sup> 51126,<sup>15</sup> 51130,<sup>16</sup> 51146,<sup>17</sup> 51222,<sup>18</sup> 51544,<sup>19</sup> 51642,<sup>20</sup> 51917,<sup>21</sup> 51928,<sup>22</sup> 51940,<sup>23</sup> 51981,<sup>24</sup> 52089,<sup>25</sup> 52099,<sup>26</sup> 52410,<sup>27</sup> 52661,<sup>28</sup> 52700,<sup>29</sup> 52702,<sup>30</sup> 52803,<sup>31</sup> 52879,<sup>32</sup> 52880,<sup>33</sup> 53317,<sup>34</sup> 53326,<sup>35</sup> 53429, and 53430.

<sup>11</sup> Application of Jones-Owen Company dba South Silver Creek I, II, and III and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Burnet County, Docket No. 51047, Notice of Approval (Apr. 19, 2021).

<sup>12</sup> Application of Treetop Utilities, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker County, Docket No. 51065, Corrected Notice of Approval (Mar. 10, 2021).

<sup>13</sup> Application of Donald E. Wilson dba Quiet Village II dba QV Utility CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hidalgo County, Docket No. 51089, Notice of Approval (Nov. 18, 2021).

<sup>14</sup> Application of Shady Oaks Water Supply Company, LLC and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Wilson County, Docket No. 51118, Notice of Approval (Mar. 18, 2021).

<sup>15</sup> Application of Shawn M. Horvath dba Aero Valley Water Service and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer, Or Merger of Facilities and to Amend CSWR-Texas Utility Operating Company, LLC's Certificate of Convenience and Necessity in Denton County, Docket No. 51126 (pending).

<sup>16</sup> Application of Laguna Vista Limited and Laguna Tres, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hood County, Docket No. 51130, Notice of Approval (Apr. 20, 2021).

<sup>17</sup> Application of Abraxas Corporation and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker County, Docket No. 51146, Notice of Approval (Apr. 23, 2021).

<sup>18</sup> Application of the Estate of Patetreen Petty McCoy dba Big Wood Springs Water Company and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Wood County, Docket No. 51222, Notice of Approval (Feb. 16, 2022).

<sup>19</sup> Application of Franklin Water Service Co. LLC and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer, Or Merger of Facilities and Certificate Rights in Lubbock County, Docket No. 51544, Notice of Approval (Feb. 15, 2022).

<sup>20</sup> Application of James L. Nelson dba WaterCo and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Montague County, Docket No. 51642, Notice of Approval (Mar. 15, 2022).

<sup>21</sup> Application of Rocket Water Company, Inc. and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer, Or Merger of Facilities and Certificate Rights in Hays County, Docket No. 51917, Notice of Approval (Mar. 8, 2022).

<sup>22</sup> Application of Betty J. Dragoo and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer, or Merger of Facilities and Associated Acreage in Erath County, Docket No. 51928, Notice of Approval (Jan. 21, 2022).

<sup>23</sup> Application of Walnut Bend Water Supply and CSWR-Texas Utility Operating Company, LLC For Sale, Transfer or Merger of Facilities and Certificate Rights in Angelina County, Docket No. 51940, Notice of Approval (Mar. 15, 2022).

<sup>24</sup> Application of Live Oak Hills and Flag Creek Ranch Water Systems and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Llano and McCulloch Counties, Docket No. 51981, Notice of Approval (Jan. 28, 2022).

## CSWR-Texas's Compliance History

- 17. CSWR-Texas has not been under enforcement action by the Commission, TCEQ, Texas Health and Human Services, the Office of the Texas Attorney General, or the United States Environmental Protection Agency in the past five years for non-compliance with rules, orders, or state statutes.
- 18. CSWR-Texas does not have a history of continuing mismanagement or misuse of revenues as a utility service provider.
- 19. CSWR-Texas demonstrated a compliance history that is adequate for approval of the transaction to proceed.

<sup>28</sup> Application of Tri-County Point Property Owners Association and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Calhoun and Jackson Counties, Docket No. 52661 (pending).

<sup>29</sup> Application of RJR Water Company and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Parker and Palo Pinto Counties, Docket No. 52700 (pending).

<sup>30</sup> Application of CSWR-Texas Utility Operating Company, LLC and Fremont Water Company for Saale, Transfer, or Merger of Facilities and Certificate Rights in Kerr County, Docket No. 52702, Notice of Approval (Aug. 5, 2022).

<sup>31</sup> Application of Copano Cove Water Company, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate rights in Aransas County, Docket No. 52803 (pending).

<sup>32</sup> Application of Carroll Water Company, Inc. and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Ellis County, Docket No. 52879 (pending).

<sup>33</sup> Application of Texas Landing Utilities and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Polk and Montgomery Counties, Docket No. 52880 (pending).

<sup>34</sup> Application of CSWR-Texas Utility Operating Company, LLC and Jusryn Company, Inc. dba Shady Grove Sewer System for Sale, Transfer, or Merger of Facilities and Certificate Rights in Hood County, Docket No. 53317 (pending).

<sup>35</sup> Application of CSWR-Texas Utility Operating Company, LLC and Aransas Bay Utilities Co., LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Aransas County, Docket No. 53326 (pending).

<sup>&</sup>lt;sup>25</sup> Application of Alpha Utility of Camp County, LLC and CSWR-Texas utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Camp County, Docket No. 52089, Notice of Approval (Mar. 25, 2022).

<sup>&</sup>lt;sup>26</sup> Application of THRC Utility, LLC and CSWR-Texas Utility Operating Company, LLC for Sale, Transfer, or Merger of Facilities and Certificate Rights in Navarro County, Docket No. 52099, Corrected Notice of Approval (Jul. 28, 2022).

<sup>&</sup>lt;sup>27</sup> Application of CSWR-Texas Utility Operating Company, LLC and Leon Springs Utility Co., Inc. for Sale, Transfer, or Merger of Facilities and Certificate Rights in Bexar County, Docket No. 52410, Notice of Approval (Jun. 3, 2022).

# Adequacy of Existing Service

- 20. There are currently 67 connections in the requested area that are being served by Cassie Water through public water system number 0270047 and such service has been continuous and adequate.
- 21. The Commission's complaint records, which date back to 2017, show one complaint against Cassie Water.
- 22. There is no evidence in the record that Cassie Water has failed to comply with any Commission or TCEQ order.

# <u>Need for Additional Service</u>

- 23. There is a continuing need for service because Cassie Water currently serves 67 customer connections in the requested area.
- 24. This is an application to transfer only existing facilities, customers, and service area.
- 25. There is no evidence of specific requests for additional service within the requested area.

# Effect of Approving the Transaction and Granting the Amendment

- 26. Approving the sale and transfer to proceed and granting the CCN amendment will obligate CSWR-Texas to provide continuous and adequate water service to current and future customers in the requested area.
- 27. Because this application is to transfer only existing facilities, customers, and service area, there will be no effect on any other retail public utility servicing the proximate area.
- 28. There will be no effect on landowners in the requested area because the requested area is currently certificated.

# Ability to Serve: Managerial and Technical

- 29. CSWR-Texas owns and operates 34 public water systems registered with TCEQ and does not have any active violations listed in the TCEQ database.
- The Commission's complaint records, which date back to 2017, show 12 complaints against CSWR-Texas.
- 31. CSWR-Texas employs or contracts with TCEQ-licensed operators who will operate public water system number 0270047.