# SANFORD LAW OFFICE, PLLC

Jo Anne Sanford, Attorney at Law

June 9, 2023

Ms. A. Shonta Dunston, Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4325

**Via Electronic Delivery** 

Re: Application by Carolina Water Service, Inc. of North Carolina for Certificate of Public Convenience and Necessity to Serve Carteret

County Water System

NCUC Docket No. W-354, Sub 399

--- CWSNC Testimony: Matthew P. Schellinger II

Dear Ms. Dunston:

Please accept for filing the attached revisions, offered by Carolina Water Service, Inc. of North Carolina ("CWSNC" or "Company") to Schellinger Rebuttal Exhibits MPS-3 and MPS-4, which were filed as part of Mr. Schellinger's Rebuttal testimony in this docket on March 29, 2023. Revised Rebuttal Exhibit MPS-3 is an "Addendum to the Application" and Revised Rebuttal Exhibit MPS-4 is captioned "Cost of Service Calculations."

These revised Exhibits simply update various projections and other calculations to incorporate the impact of the Commission's recent orders in Docket No. W-354 Sub 400, which have changed certain rates and charges for CWSNC. This filing does not constitute a concession by CWSNC that the Sub 400 rates are relevant to the Commission's decision in this docket.

I hereby certify that this filing has today been served on the parties to this docket.

Thank you and your staff for your assistance; please feel free to contact me if there are questions or if additional information is required.

# **Electronically Submitted**

/s/Jo Anne Sanford North Carolina State Bar No. 6831 Sanford Law Office, PLLC P.O. Box 28085 Raleigh, NC 27611

# **Attorney for CWSNC**

c: Rob Wheatly
William Creech
Gina C. Holt
Lucy Edmondson

# Carteret ADDENDUM TO APPLICATION FOR TRANSFER OF PUBLIC UTILITY FRANCHISE AND FOR APPROVAL OF RATES

Page 1 of 4 Updated 05/19/23

## **Projected Income Statement - Water Operations**

Line						
No.	<u>Item</u>	Year 1	Year 2	Year 3	Year 4	Year 5
	Operating revenue					
1	Metered service revenue	\$1,006,942	\$1,014,561	\$1,029,036	\$1,044,274	\$1,335,037
2	Flat rate service revenue	<u> </u>	<del>-</del> .			
3	EPA testing surcharge	<u> </u>	<del></del> ,			
4	Re-connect fees	<u> </u>	<u> </u>	<u> </u>		<u> </u>
5	Return check charge	<u> </u>	<u> </u>			
6	Late payment charges			- 220		
7	Other operating revenue	8,545	8,608	8,726	8,852	8,977
8	Total operating revenue (Sum of Line 1 thru Line 7)	1,015,487	1,023,169	1,037,762	1,053,126	1,344,014
	Operating expenses					
9	Total salaries and wages (employees only)	196,273	197,711	200,443	203,319	206,195
10	Outside labor expense (non-employees)	-	-	-	-	-
11	Administrative and office expense	16,052	16,170	16,393	16,629	16,864
12	Maintenance and repair expense	58,982	59,414	60,235	61,099	61,963
13	Purchased water	<u> </u>	-	-	-	-
14	Purchased sewage treatment	-	-	-	-	-
15	Electric power expense (exclude office)	55,460	55,866	56,638	57,451	58,263
16	Chemicals expense	17,431	17,559	17,801	18,057	18,312
17	Testing fees	9,828	9,900	10,037	10,181	10,325
18	Transportation expense	13,322	13,420	13,605	13,801	13,996
19	Other operating expenses	234,534	236,253	239,517	242,953	246,390
20	Total operation and maintenance expenses (Sum of Lines 9 thru 19)	601,882	606,293	614,669	623,490	632,308
21	Annual depreciation/amortization expense	279,193	280,943	280,943	280,943	280,943
22	Property taxes paid on utility property	6,306	6,353	6,440	6,533	6,625
23	Payroll taxes	15,097	15,208	15,418	15,639	15,860
24	Franchise (gross receipts) tax	-	-	-		-
25	Annual NCUC regulatory fee	1,422	1,432	1,453	1,474	1,882
26	Total operating expenses (Sum of Line 20 thru Line 25)	903,900	910,229	918,923	928,079	937,618
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	Income taxes					
27	State income taxes	(2,168)	(2,036)	(1,716)	(1,389)	5,817
28	Federal income taxes	(17,758)	(16,674)	(14,057)	(11,376)	47,639
29	Total income taxes (Line 27 + Line 28)	(19,926)	(18,710)	(15,773)	(12,765)	53,456
30	Net operating income (loss) (Line 8 - Line 26 - Line 29)	\$131,513	\$131,650	\$134,612	\$137,812	\$352,940
31	Interest expense	198,317	194,375	187,491	180,609	173,726
32	Net income (loss) (Line 30 - Line 31)	(\$66,804)	(\$62,725)	(\$52,879)	(\$42,797)	\$179,214

# Carteret ADDENDUM TO APPLICATION FOR TRANSFER OF PUBLIC UTILITY FRANCHISE AND FOR APPROVAL OF RATES

## Statement of Cash Flows - Water Operations

Line						
No.	<u>ltem</u>	Year 1	Year 2	Year 3	Year 4	Year 5
	Cash Flows From Operating Activities					
1	Pre-tax operating income (loss):					
2	Total operating revenue	\$1,015,487	\$1,023,169	\$1,037,762	\$1,053,126	\$1,344,014
3	Less: Operation and maintenance expenses	601,882	606,293	614,669	623,490	632,308
4	Less: Taxes other than income	22,825	22,993	23,311	23,646	24,367
5	Pre-tax operating income (loss)	390,780	393,883	399,782	405,990	687,339
6	Income tax calculation:					
7	Pre-tax operating income (loss)	390,780	393,883	399,782	405,990	687,339
8	Plus: Contributions in aid of construction					
9	Less: Tax depreciation	174,561	351,622	354,122	354,122	354,122
10	Less: Interest expense	198,317	194,375	187,491	180,609	173,726
11	Taxable income (loss)	17,902	(152,114)	(141,831)	(128,741)	159,491
12	State income tax	448	(3,803)	(3,546)	(3,219)	3,987
13	Federal income tax	3,665	(31,145)	(29,040)	(26,360)	32,656
14	Total income taxes to be paid	4,113	(34,948)	(32,586)	(29,578)	36,643
15	Net cash provided by (used in) operating activities	\$386,667	\$428,831	\$432,368	\$435,568	\$650,696
	Cash Flows From Investing Activities					
16	Purchases of utility plant	\$8,728,039	125,000	_	_	_
17	Plus: Cash bonds posted	-	-			_
18	Less: Contributions in aid of construction					
19	Less: Proceeds from disposal of utility plant					_
20	Net cash used (provided) by investing activities	8,728,039	125,000.00	-		-
	Cash Flows From Financing Activities					
21	Proceeds from issuing short term debt	-	_	_	_	_
22	Less: Principal repayment of short term debt					
23	Plus: Proceeds from issuing long term debt					
24	Less: Principal repayment of long term debt					_
25	Less: Interest payment for short and long term debt					
26	Plus: Proceeds from issuing stock					
27	Less: Dividends paid					
28	Plus: Funds provided by owner					-
29	Net cash provided (used) by financing activities	<u> </u>			<u> </u>	-
30	Net increase (decrease) in cash	(\$8,341,372)	\$303,831	\$432,368	\$435,568	\$650,696
31	Cash balance at beginning of year		(\$8,341,372)	(\$8,037,541)	(\$7,605,173)	(\$7,169,605)
32	Cash balance at end of year	(\$8,341,372)	(\$8,037,541)	(\$7,605,173)	(\$7,169,605)	(\$6,518,909)

Updated 05/19/23

#### **Assumptions:**

#### Sub 399 - Carteret CPCN Addendum Assumptions

#### Revenue:

Year 1 Revenue is at Carteret County current rates with customer counts and usage as of 06/30/22, per Sub 398 Junis Testimony Attachment 3a.

Year 2-5 Revenue is growth adjusted by an increase in ERC count of 1.5%. Compounded annual growth rates from 2019-2022 is approximately 2.09%. Further the growth assumption assumes average period customers in the given year.

Year 5 Revenue is adjusted to a \$/erc level equivalent to the expected MYRP RY 3 revenues + 5%, to account for an assumed effective date and impacts of the first rate case after acquisition.

#### **Expense:**

The basis for all expense assumptions start at a Sub 400 final Net Operating Income (NOI) for Uniform Water customers divided by total ERC count for that same period for each expense category. Projected customer growth accounts for projected expense growth.

Certain NOI line items are not included on a \$/ERC basis as not applicable to inclusion of new customers (such as Purchased Water and Regulatory Commission Expenses), additionally certain \$/ERC calculations are included in determining the cost to serve and revenue requirements but are not incremental to the acquisitions.

NOI Line items that are included but are not incremental to the acquisition represent costs that are currently included in the cost to serve but will not increase as a result of the acquisition. The addition of new customer base picking up these allocated costs reduces the total burden on a \$/ERC basis and represent economies of scale related to the acquisition.

## Examples:

Rent (Charlotte Office, Warehouse, etc.)

Office Utilities

Office Supplies

Corporate Allocations

Regional Salaries

Additional NOI line items are calculated based on inputs from other schedules or as a fallout/calculated adjustment related to the revenues and expenses.

#### **Assumptions:**

#### Sub 399 - Carteret CPCN Addendum Assumptions

#### Manually Calculated Examples:

#### **Depreciation Expense**

Calculated based on Carteret County Books PIS costs of \$12,195,043 and accumulated depreciation of \$6,793,016 as of 06/30/22. Imputed A/D through 12/31/22 of 6,992,436.

Assets were placed into categories based on type of asset (IE: mains, services, water plant) and assumed depreciation rates equivalent to current CWSNC Uniform depreciation rates on a going forward basis. Results in a going forward depreciation rate of 1.40% on the original 12,195,043 PIS costs.

Annual depreciation expense of \$167,769 divided by the Net Book Value of plant of \$5,202,607 yields a 3.22% rate for Purchase Acquisition Adjustment amortization in order to have PIS and PAA finish depreciating and amortizing at the same time.

# **Purchase Acquisition Adjustment Expense**

Purchase Acquisition Adjustment (PAA) is assumed to be the difference between the NBV of plant on the date of close or \$5,202,607 in this model and the Commission Ordered Fair Market Value of \$8,416,000 results in \$3,213,393 in PAA. The amortization rate for this PAA is assumed to be 3.22% in order for PAA to finish amortizing with the depreciable assets.

Further approved acquisition costs of \$312,039 are also assumed to be amortrized in the Organization account (2.5%) the same as the Riverbend and Silverton acquisitions.

#### Fallout / Calculated Examples:

NCUC Regulatory Fee - 0.14% Interest Expense - 50% debt, 4.64% debt rate - from Sub 384 State Income Taxes - 2.5% Federal Income Taxes - 21.0%

#### Cash Flows:

Cash Flow assumptions assume the total purchase price + acquisition costs of \$8,728,039 are incurred in year 1 and year 2 costs of \$125,000 for tank work is incurred.

Revised Rebuttal Exhibit MPS-4 W-354, Sub 399 - Carteret CPCN Cost of Service Calculations

## Cost of Service Comparisons

Line No.	<u> </u>	Year 1		Year 2		Year 3		Year 4	Year 5	Notes
	Rate Base - Example	12/31/2023		12/31/2024		12/31/2025		12/31/2026	12/31/2027	
1	Plant	12,195,043		12,320,043		12,320,043		12,320,043	12,320,043	
2	A/D	(7,160,206)		(7,327,975)		(7,497,494)		(7,667,013)	(7,836,533)	
3	PAA	3,525,432		3,525,432		3,525,432		3,525,432	3,525,432	
4	AA of PAA	(111,424)		(222,848)		(334,271)		(445,695)	(557,119)	
5	ADIT (Line 16)	24,065		7,809		(9,022)		(25,853)	(42,684)	
6	Working Capital (O&M Expenses / 8)	75,235		75,787		76,834		77,936	79,039	
7	Rate Base (Sum Line 1 through 6)	\$ 8,548,147	\$	8,378,249	\$	8,081,522	\$	7,784,850	\$ 7,488,178	
	ADIT Calculations	 Sub 384	Sι	ıb 400 RY1	Sı	ub 400 RY2	Sı	ıb 400 RY3	 MYRP 2.0	
8	Depreciation and Amortization Expense	(279,193)		(280,943)		(280,943)		(280,943)	(280,943)	
9	MACRS Depreciation (4%)	(174,561)		(351,622)		(354,122)		(354,122)	(354, 122)	
10	Tax Rate	23%		23%		23%		23%	23%	
11	ADIT	\$ 24,065	\$	(16,256)	\$	(16,831)	\$	(16,831)	\$ (16,831)	
12	Regulatory Rate Base	8,448,846		8,294,653		8,013,710		7,732,767	7,451,824	
13	Tax Rate Base	8,553,478		8,328,606		7,974,484		7,620,362	7,266,240	
14	Timing Differences (Line 13 - Line 12)	\$ 104,632	\$	33,953	\$	(39,226)	\$	(112,405)	\$ (185,584)	
15	Tax Rate (Composite 21% Federal, 2.5% State)	23%		23%		23%		23%	23%	
16	Cumulative ADIT (Line 14 * Line 15)	\$ 24,065	\$	7,809	\$	(9,022)	\$	(25,853)	\$ (42,684)	
	<u>Capital Structure</u>									
17	Debt - Hypothetical from Sub 400	50%		50%		50%		50%	50%	
18	Equity - Hypothetical from Sub 400	50%		50%		50%		50%	50%	
	Return on Capital - Post Tax									
19	Debt	4.64%		4.64%		4.64%		4.64%	4.64%	
20	Equity - Sub 400	9.80%		9.80%		9.80%		9.80%	9.80%	
	Cost of Capital - Pre Tax									Retention Factors
21	Debt - 4.64% rate from Sub 400 (Line 7 * 17 * 19 / 0.9986)	198,595		194,648		187,754		180,862	173,969	0.9986
22	Equity - Sub 400 - Authorized - (Line 7 * 18 * 20 / 0.769172)	544,559		533,735		514,832		495,933	477,033	0.769172

Revised Rebuttal Exhibit MPS-4 W-354, Sub 399 - Carteret CPCN Cost of Service Calculations

	Revenue Requirement - Total		Sub 384	Su	ıb 400 RY1	Su	ıb 400 RY2	Sul	400 RY3	М	YRP 2.0	st of oct vice calculations
23	Total operation and maintenance expenses (From Addendum)		601,882		606,293		614,669		623,490		632,308	
24	Annual depreciation expense		279,193		280,943		280,943		280,943		280,943	
25	Property taxes paid on utility property		6,306		6,353		6,440		6,533		6,625	
26	Payroll taxes		15,097		15,208		15,418		15,639		15,860	
27	Annual NCUC regulatory fee		1,422		1,432		1,453		1,474		1,882	
28	Debt (Line 21)		198,595		194,648		187,754		180,862		173,969	
29	Equity (Line 22)		544,559		533,735		514,832		495,933		477,033	
30	Revenue Requirement - Standalone (Sum Lines 23 through 29)	\$	1,647,054	\$	1,638,612	\$	1,621,509	\$	1,604,874	\$	1,588,621	
	Non Incremental Expenses (ERC * \$/ERC)		Sub 384	٠.	ıb 400 RY1	٠.	ıb 400 RY2	61	400 RY3		YRP 2.0	\$/ERC
31	Rent		10,647	30	10,725	30	10,873	Jui	11,029	IVI	11,185	7.80
32	Office Utilities		9,091		9,158		9,284		9,417		9,550	6.66
33	Office Supplies		2,329		2,346		2,378		2,412		2,447	1.71
34	Corporate Allocations		140,226		141,254		143,206		145,260		147,315	102.73
35	CWSNC Total Salaries and Benefits, including allocations		235,763		237,490		240,772		244,226		247,680	172.72
36	Direct Salary Additions		(143,000)		(144,048)		(146,038)		(148,133)		(150,229)	(104.76)
37	Total Non Incremental Expenses (Sum Lines 31 through 36)	\$	255,056	\$	256,925	\$	260,475	\$	264,212	\$	267,949	(104.70)
01	Total from moromonial Expenses (cam Emes of through se)	Ψ	200,000	Ψ	200,020	Ψ	200, 170	Ψ	201,212	Ψ	201,010	
38	Revenue Requirement - Uniform Rates (Line 30 - Line 37)	\$	1,391,998	\$	1,381,688	\$	1,361,035	\$	1,340,662	\$	1,320,672	
	Dates from Content Devenantive		Cb 204	· ·	-b 400 DV4	· ·	.b. 400 DV2	C1	400 DV2		VDD 2.0	
39	Rates from Carteret Perspective ERC - Carteret		Sub 384 1,365	Su	1,375	<u> </u>	1,394	Sui	1,414	IVI	YRP 2.0 1,434	
39	ERC - Carteret		1,300		1,375		1,394		1,414		1,434	
40	Average Monthly Bill - Current, then put into Uniform Rates	\$	61.47	\$	61.47	\$	61.47	\$	61.47	\$	77.58	
41	Average Monthly Bill - Standalone Rates (Line 30 / Line 39 / 12)	•		•		•		•		\$	92.32	
42	Average Monthly Bill - Carteret, no CWSNC ownership	\$	61.47	\$	86.06	\$	88.12	\$	90.24	\$	92.40	40% yr 1, 2.4% continuing
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	Rates from Uniform Water Perspective		Sub 384		ıb 400 RY1		ıb 400 RY2		400 RY3		YRP 2.0	Notes
43	Uniform Water Revenue Requirement W/O Carteret (Sub 400 Final Order)	\$	21,822,021		24,961,455		26,337,089		6,875,972		8,219,771	Sub 400 + 5%
44	Revenue Requirement - Carteret Standalone (Line 43 - Line 37)	\$	21,822,021		24,961,455		26,337,089		6,875,972		7,951,822	
45	Revenue Requirement w/ Carteret (Line 43 + Line 38)	\$	21,822,021	\$ 2	24,961,455	\$ :	26,337,089	\$ 2	6,875,972	\$ 29	9,540,442	
46	ERC w/o Carteret (Sub 400 ERC)		29,426		29,426		29,716		30,006		30,296	
47	ERC w/ Carteret (Line 46 + Line 39)		30,791		30,801		31,110		31,420		31,730	
47	Live w cartelet (Line 40 + Line 33)		50,751		30,001		31,110		31,420		31,730	
			Sub 384	_	ıb 400 RY1	_	ıb 400 RY2		400 RY3		YRP 2.0	
48	Average Monthly Bill - CWSNC Uniform Water Rates - Sub 400	\$	61.80	\$	70.69	\$	73.86	\$	74.64	\$	77.62	
49	Average Monthly Bill - CWSNC Uniform Water Rates - Carteret Standalone	\$	61.80	\$	70.69	\$	73.86	\$	74.64	\$	76.89	
50	Average Monthly Bill - CWSNC Uniform Water Rates - incl. Carteret	\$	61.80	\$	70.69	\$	73.86	\$	74.64	\$	77.58	