

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. W-218 SUB 573

IN THE MATTER OF APPLICATION BY AQUA NORTH CAROLINA, INC., FOR AUTHORITY TO ADJUST AND INCREASE RATES FOR WATER AND SEWER UTILITY SERVICE IN ALL SERVICE AREAS IN NORTH CAROLINA	DIRECT TESTIMONY OF P. DAVID HADD ON BEHALF OF AQUA NORTH CAROLINA, INC.
---	--

APPENDIX 3
SCHEDULE 4

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. W-218, SUB 573

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

IN THE MATTER OF
APPLICATION BY AQUA NORTH CAROLINA, INC.,
202 MACKENAN COURT, CARY, NORTH CAROLINA 27511,
FOR AUTHORITY TO ADJUST AND INCREASE RATES FOR WATER
AND SEWER UTILITY SERVICE IN ALL SERVICE AREAS IN
NORTH CAROLINA

PREFILED DIRECT TESTIMONY OF
P. David Haddad
ON BEHALF OF
AQUA NORTH CAROLINA, INC.

June 30, 2022

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is David Haddad, I am a consultant with Regulated Capital
3 Consultants, LLC (RCC), and my business address is 4355 Cobb Parkway,
4 Suite J255, Atlanta, GA 30339. My role in this case is to provide support to
5 the Aqua North Carolina (Aqua North Carolina, ANC, or Company) finance
6 team to manage delivery of all filing requirements associated with the North
7 Carolina Utilities Commission (NCUC or Commission) Form W1 (Items 1-
8 30). Specifically, I have worked with the Company to develop the rate case
9 accounting model exhibits to satisfy the requirements of NCUC Rule R1-
10 17A in relation to the Water System Improvement Plan (WSIP).

11 **Q. PLEASE BRIEFLY DESCRIBE YOUR BUSINESS EXPERIENCE.**

12 A. My professional experience incorporates over 35 years in the energy/utility
13 industry. Prior to joining RCC, I worked 27 years in various segments of the
14 utility sector as regulatory compliance/policy professional. I started my
15 career in 1986 working in the rate department of an interstate gas
16 transmission & storage company as a rate analyst and revenue accountant.
17 I then moved to the local gas distribution business as a manager and then
18 director of regulatory policy. In this role I served as the company liaison to
19 the respective commission, staff and advocates. I also managed the utility
20 regulatory process (rate cases, audits, gas cost recovery filings, etc.) with
21 oversight of the company tariffs before the respective commissions. In 2014
22 I joined RCC as a consultant. In this role I have provided the following

1 services to clients:

- 2 • Project management
- 3 • Review and analysis of tax flow through and normalization policies
- 4 • Rate case management and revenue requirement modeling
- 5 • Technical and functional assistance, client support and remediation

6 Clients that I have provided consulting services to include: American Water,
7 Ameren Company, Atmos Energy, Central Hudson Gas & Electric, Central
8 Louisiana Electric Company, Dominion Energy, Duquesne Light Company,
9 First Energy, Pepco Holdings Inc, Tucson Electric Power, We Energies,
10 PPL Corporation, Southwest Gas Company and Upper Peninsula Power
11 Company.

12 **Q. PLEASE DISCUSS YOUR EDUCATIONAL AND PROFESSIONAL**
13 **BACKGROUND.**

14 A. I am a graduate of West Virginia University Institute of Technology with a
15 Bachelor of Science degree in Business Management.

16 **Q. HAVE YOU EVER TESTIFIED BEFORE A REGULATORY COMMISSION**
17 **BEFORE?**

18 A. Yes. I have submitted testimony before the Pennsylvania Public Utility
19 Commission in Docket Nos. C-20031302, et al., R-00038245, R-00049783,
20 R-00050340, R-00072175, R-2008-2011621, and R-2009-2093219. I have
21 also testified before the Maryland Public Service Commission in Case Nos.
22 9159, 8511(aa) 8511(bb).

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

2 A. The purpose of my testimony is to address certain financial aspects of the
3 rate case. These are, specifically:

4 1) capital structure,

5 2) rate design,

6 3) the conservation pilot program, and

7 4) the Consumption Adjustment Mechanism.

8 **Q. WHAT TEST YEAR PERIOD DOES YOUR TESTIMONY ADDRESS?**

9 A. My testimony addresses the test year beginning January 1, 2021,
10 through December 31, 2021, as well as certain adjustments that extend
11 into the post-test year period (2022) and are pro forma in nature. The
12 rate design periods under the proposed WSIP are calendar years 2023,
13 2024 and 2025 representing Rate Years 1 – 3, respectively.

14 **1. CAPITAL STRUCTURE**

15 **Q. WHAT IS THE COMPANY'S PROPOSED CAPITAL STRUCTURE IN**
16 **THIS RATE CASE?**

17 A. The Company proposes a ratio of 50% equity and 50% long-term debt
18 in the financing of its operations. This ratio is consistent with the
19 structure approved by the Commission in prior rate cases. The
20 proposed cost of debt used in the WSIP is 4.01%. This rate was
21 derived from the long-term borrowings of the Company as of May
22 2022. When including the proposed cost of equity rate of 10.40%

1 supported by Company expert witness Dylan D'Ascendis, the resulting
2 proposed overall rate of return is 7.21%. Please see Mr. D'Ascendis'
3 direct testimony for additional analysis related to capital structure.

4 **2. RATE DESIGN**

5 **Q. WHAT DO YOU PROPOSE IN YOUR RATE DESIGN WITH RESPECT**
6 **TO THE DISTRIBUTION BETWEEN BASE FACILITY CHARGES AND**
7 **VOLUMETRIC RATES?**

8 A. The Company proposes no modification to the fixed/variable ratio from
9 that proposed by the Public Staff and approved by the Commission in
10 the Company's last rate case (Docket No. W-218, Sub 526). That
11 structure includes allocations of fixed charges (base facility charges
12 (BFC)) and volumetric consumption charges for the average water
13 customer as follows:

Entity	Fixed/BFC	Volumetric
ANC	41.4%	58.6%
Brookwood	41.0%	59.0%
Fairways	44.0%	56.0%

14
15 Similarly, the Company proposes no modification to the previously
16 approved fixed/variable structure for its metered wastewater customers
17 (the unmetered are subject to a flat rate charge).

WW Rate Division	Fixed/BFC	Volumetric	% Of Metered Customers
ANC	80%	20%	58%
Fairways	80%	20%	94%

1
2 **Q. DO YOU SPONSOR ANY EXHIBITS IN THIS CASE RELATED TO**
3 **RATE DESIGN?**

4 A. Yes. The billing determinants, proposed rates, and revenues are contained
5 in the Company's application Exhibits F, H, and J. The historical data trends
6 and proposed rate effects are contained in those exhibits. The direct
7 testimony that follows will discuss the development of the data contained
8 therein. These items take into consideration the WSIP being requested in
9 this proceeding.

10 **Q. PLEASE DESCRIBE THE BILLING DETERMINANTS INCLUDED IN**
11 **THE PROPOSED RATE DESIGN.**

12 A. Historical billing determinants consist of the number of bills and gallons
13 used by customers by class by month over the test year and the two prior
14 years. Billing determinants for the pro forma rate design years, Rate Years
15 1 – 3, are projected as discussed below.

16 **Q. PLEASE DESCRIBE THE METHOD USED TO DEVELOP BILLING**
17 **DETERMINANTS.**

18 A. Billing information was obtained covering three 12-month periods ending
19 December 31, of 2019, 2020, and 2021. From those reports, the number
20 of bills and consumption in each month of those three years was compiled

1 by tariff division, class of service, and meter size.

2 **Q. HOW DID YOU VALIDATE THE ACCURACY OF THE TEST PERIOD**
3 **BILLING DETERMINANTS?**

4 A. The number of bills, consumption volumes, and dollar amounts charged in
5 the test year were analyzed and compared to the base and usage rates in
6 effect during the test year for the various meter sizes and rate groups.
7 These test year charges were reconciled to the test year booked revenue
8 to within less than one percent, thereby validating the accuracy of the
9 developed billing determinants.

10 **Q. IS A USAGE ADJUSTMENT INCLUDED IN DEVELOPMENT OF PRO**
11 **FORMA DETERMINANTS?**

12 A. Yes. Consistent with past practice, the average test year usage per bill was
13 compared to the average usage per bill in the 3-year period ending with the
14 test year. A 3-Year / Test Year factor was calculated, and that factor was
15 applied to the test year usage volumes to obtain normalized average test
16 year usage per bill.

17 **Q. HOW WAS TEST PERIOD DATA ADJUSTED TO ACCOUNT FOR**
18 **END-OF-PERIOD CUSTOMERS?**

19 A. The customer count in the last month of the test period (December 2021)
20 was normalized to an annual number of bills. In each category (tariff group,
21 class, meter size) these normalized bill numbers were multiplied by the
22 normalized average test year usage per bill to get normalized annual usage.

1 **Q. IS A GROWTH ADJUSTMENT INCLUDED IN DEVELOPMENT OF**
2 **PRO FORMA BILLED-MONTHS BILLING DETERMINANTS?**

3 A. Yes, the Company is projecting growth of customers through calendar year
4 2025. These projections are based on recent growth history for each rate
5 division. Additional bills and proportional additional usage were added to
6 Pro Forma calculations in anticipation of that growth.

7 **Q. DO YOU BELIEVE THAT THE LEVEL OF PRO FORMA REVENUES**
8 **AT PRESENT RATES AS SHOWN ON EXHIBIT H IS APPROPRIATE**
9 **FOR SETTING RATES IN THIS CASE?**

10 A. Yes, present rates were applied to the Pro Forma billing determinants for
11 Rate Year 1 to calculate Pro Forma revenue at Present Rates, and I submit
12 this is correct.

13 **Q. HOW WERE THE PROPOSED RATES DEVELOPED?**

14 A. Proposed base charges and volumetric rates were developed so that, when
15 applied to the Pro Forma billing determinants, the rates would result in an
16 expected revenue amount that matched the applied-for revenue
17 requirements within an acceptable rounding margin of one tenth of a
18 percent. This "proof of revenue" is shown in application Exhibit H in the
19 column for proforma revenue at proposed rates.

20 **Q. DID YOU MAKE ANY RATE STRUCTURE CHANGES IN PROPOSED**
21 **RATES?**

22 A. Yes, changes are proposed for the rate structures of Carolina Meadows and

1 for customers with sewer treatment purchased from Charlotte Water.

2 **Q. WHAT CHANGE WAS MADE FOR CAROLINA MEADOWS?**

3 A. In settlement of the last Aqua rate case, to minimize rate shock, the
4 Residential Equivalent Units (REUs) for rate design were set at 186 (i.e.,
5 50% of the Public Staff's count of 372 REUs). The structure change in this
6 case is to use fully calculated REUs for rate design.

7 **Q. WHAT CHANGE WAS MADE FOR CUSTOMERS USING SEWER**
8 **TREATMENT FROM CHARLOTTE WATER?**

9 A. Aqua experienced a significant number of billing complaints from its sewer
10 customers in the Huntley Glen, Park South and Parkway Crossing
11 subdivisions immediately following the approved rate changes per the
12 Commission's Order of October 26, 2020, in Docket No. W-218 Sub 526.
13 Aqua's sewer customers in these subdivisions (approx. 997) have treatment
14 provided by Charlotte Water (the City). The City bills Aqua for sewer
15 treatment. Aqua effectively "passes-through" the City's usage rate to these
16 metered sewer customers by replacing Aqua's volumetric usage rate with
17 the City's for customer billing purposes. Prior to the ruling in the last rate
18 case, these pass-through customers paid a base facility charge at the same
19 scale as Aqua's Monthly Metered Service (commercial) tariff customers;
20 that base charge was about 36% of the flat rate charged to the ANC-Uniform
21 sewer rate customers. In the last case, most ANC-Uniform sewer
22 customers moved from a monthly flat rate to metered sewer usage rates

1 plus and a monthly base facility charge; 80% fixed and 20% volumetric. At
2 that time, the Charlotte Water treatment customers also had their base
3 charges aligned with the ANC-Uniform sewer rate customers, which
4 increased their monthly base facility charge; however, their usage rate
5 remained the same Charlotte Water usage pass-through rate, which was
6 not reduced to adjust for the increase in the fixed component like the rest of
7 the ANC-Uniform metered customers usage rates were. An unintended
8 consequence of that rate structure ordered in the last case was that these
9 metered residential sewer customers received a rate increase of a much
10 higher percentage than other Aqua Sewer customers, and they have been
11 paying higher bills than the ANC-Uniform sewer customers for comparative
12 usage since then.

13 Aqua seeks to remedy the billing imbalance placed upon these customers
14 by consolidating these customers and their related purchased sewer costs
15 into the ANC sewer utility service tariff for "Monthly Metered Service
16 (residential and commercial customers)", eliminating their pass-through
17 billing, and including the purchased sewer costs with ANC Sewer O&M
18 expenses.

19 **3. CONSERVATION PILOT PROGRAM (Pilot)**

20 **Q. PLEASE DESCRIBE THE PILOT WATER CONSERVATION TIERED**
21 **RATE STRUCTURE.**

22 **A.** In Docket No. W-218, Sub 526, the Commission authorized a pilot program

1 with inclining block tiered water rates in these ANC systems:

- 2 • Arbor Bay
- 3 • Bayleaf Master System
- 4 • Merion
- 5 • Pebble Bay

6 Blocks chosen for residential domestic service were:

7 Block 1 – 0 to 4,000 gallons

8 Block 2 – 4,001 to 8,000 gallons

9 Block 3 – 8,001 to 15,000 gallons

10 Block 4 – 15,001 gallons or more

11 Rates were set so that the first 4,000 gallons in any month are billed at
12 65% of the single block usage rate of the non-tiered areas, the next 4,000
13 gallons at 97%, the next 7,000 gallons at 146%, and all above 15,000
14 gallons at 195%.

15 Blocks chosen for irrigation service on separate irrigation meters were:

16 Block 1 – 0 to 15,000 gallons

17 Block 2 – 15,001 gallons or more

18 Rates for irrigation blocks 1 and 2 are the same as domestic blocks 3 and
19 4.

20 **Q. IS AQUA PROPOSING TO CONTINUE THE PILOT IN THIS CASE?**

21 A. The Commission's Order of October 26, 2020, in Docket No. W-218, Sub
22 526, Finding of Fact No. 39, p. 12, calls for Aqua to analyze and apply the

1 results of a Conservation Rate Pilot Program (Pilot) to future rate structures
2 and apply “at least two summer irrigation seasons but should conclude
3 within three years of the implementation date or the effective date of new
4 base rates in a general rate case application, whichever is earlier.” The
5 Pilot has only been in place for one full irrigation season and the results are
6 insufficient to adequately utilize for the development of future rate structures
7 at the time of this filing. While the Commission’s Order of October 26, 2020,
8 in Docket No. W-218, Sub 526, also indicates that the Pilot should conclude
9 within three years of the implementation date, the Commission Order was
10 not drafted with the knowledge that a WSIP would be in place that may
11 provide for a projection of three prospective Rate Years and, therefore,
12 conflict with the possibility to satisfactorily incorporate the impact of
13 conservation rates into its rate design. For these reasons, Aqua requests
14 that the previously approved Pilot be continued until Aqua’s next rate case
15 filing, along with its revenue reconciliation component based on average
16 per customer consumption, so Aqua may use the results of its Pilot to inform
17 future rate structures.

18 **Q. PLEASE COMMENT ON THE REVENUE RECONCILIATION**
19 **MECHANISM ASSOCIATED WITH THIS CONSERVATION**
20 **INCENTIVE?**

21 A. In Docket No. W-218, Sub 526, the Company requested, and the
22 Commission approved the implementation of such a mechanism in its

1 October 26, 2020, Order.

2 Aqua has implemented that mechanism. In 2021, the first year under tiered
3 rates, tier customer usage revenue was higher than it would have been
4 without tier rates, and bill credits are pending issuance in 2022. In Docket
5 No. W-218, Sub 526A, the Commission recently heard different positions
6 from Aqua and the Public Staff on the methodology for calculating the
7 credits. Once the differences are resolved by Commission order, Aqua will
8 make refunds to its customers in the pilot service areas in the manner
9 prescribed by the Commission.

10 **4. CONSUMPTION ADJUSTMENT MECHANISM**

11 **Q. WHAT IS A CONSUMPTION ADJUSTMENT MECHANISM (CAM)?**

12 A. A CAM may be approved by the Commission as a mechanism to “track and
13 true-up variations in average per customer usage from levels approved in
14 the general rate case proceeding” pursuant to N.C.G.S. § 62-133.12A.

15 **Q. IS AQUA ASKING THE COMMISSION TO APPROVE A CAM IN**
16 **ADDITION TO THE WATER AND SEWER INVESTEMENT PLAN**
17 **(WSIP)?**

18 A. No. The statute authorizing the use of a Water and Sewer Investment
19 Plan rate-making mechanism, N.C.G.S. § 62-133.1B(d), prohibits the
20 use of a CAM during the pendency of a WSIP. It states that “Any rate
21 adjustment mechanism authorized pursuant to G.S. 62-133.12 or G.S. 62-
22 133.12A shall be discontinued during the term of any Water and Sewer

1 Investment Plan.” Because a CAM can only be authorized under
2 N.C.G.S. § 62-133.12A, it may be approved for use only if a WSIP
3 mechanism is not authorized by the Commission. The Company
4 requests Commission approval of a WSIP in the present case;
5 however, if the Commission rejects the WSIP, Aqua requests approval
6 of a CAM for its water rate entities. A CAM would be a useful tool to
7 cushion the impact of significant revenue swings resulting from
8 consumption variations.

9 **CAM PRUDENCY AND VALUE**

10 **Q. WHAT ARE BENEFITS OF A CAM?**

11 A. The Company experiences notable fluctuations in annual average
12 water consumption per customer. These fluctuations create revenue
13 instability in comparison to the expected consumption levels used in
14 rate designs to produce a specific approved revenue requirement.
15 During periods of average per customer consumption increases
16 (versus the levels set in a most recent rate case), the Company
17 collects more revenue than was projected from those customers, while
18 the opposite is true during periods of reduced average per customer
19 consumption. A CAM ensures that no more or no less revenue is
20 received than was intended from the number of customers included in
21 the approved rate design and based on an average per customer
22 usage. Because a CAM true-up is based on average per customer

1 usage, it is not meant to true up customer growth or total revenues.
2 Water conservation is a policy that can be good for the environment,
3 facilitate sustained water capacity, and incentivize our customers to
4 reduce usage between rate cases to lower their bills. However,
5 persistent consumption declines also contribute to the Company
6 having to file additional rate cases to recover resulting revenue
7 shortfalls from those used in rate design and based on historic
8 averages. A CAM ensures the average per customer consumption
9 revenues collected by the Company are consistent with those used in
10 the calculation of rates. Its use would allow customers to make
11 decisions about water use while blunting concerns about consumption
12 changes causing excessive earnings for Aqua or causing inadequate
13 earnings that drive more rate cases. Additionally, it would reduce the
14 burden for regulators as balance and fairness in rates is supported by
15 the mechanism, rather than requiring more frequent full rate case
16 reviews.

17 See Exhibit 1 for trending of average customer consumption by rate
18 entity.

19 **PROPOSED CAM STRUCTURE**

20 **Q. WHAT IS AQUA'S INTENT FOR A CAM?**

21 A. First, the intent of Aqua's CAM proposal for its water systems (CAM) is
22 to comply with Rule R7-40 – "Consumption Adjustment Mechanism For

1 Water Utilities.” Second, it is Aqua’s intent to have a true-up to actual
2 average per customer consumption, which is consistent with the
3 calculation methodology approved by the Commission in the last rate
4 case, Docket No. W-218, Sub 526, for the Conservation Pilot.

5 **Q. TO WHICH CUSTOMER CLASSIFICATIONS AND RATE DIVISIONS**
6 **WOULD THE CAM APPLY?**

7 A. If the WSIP is not approved, Aqua proposes to incorporate a CAM for
8 the following customer classifications located within each of its three
9 water rate divisions as follows:

- 10 • **Aqua North Carolina Water Systems** = All Monthly Metered Service
11 Customers with the same usage charge per 1000 gallons (residential
12 and commercial)
- 13 • **Brookwood and LaGrange Service Areas** = All Monthly Metered
14 Service Customers with the same usage charge per 1000 gallons
15 (residential and commercial)
- 16 • **Fairways and Beau Rivage Water Systems** = All Monthly Metered
17 Service Customers with the same usage charge per 1000 gallons
18 (residential and commercial)

19 All unmetered or flat rate customers as well as those customers in
20 systems with approved purchase water pass-through usage rates are
21 excluded from a CAM in accordance with Rule R7-40. Also excluded are
22 customers on any systems acquired after the date Aqua files its

1 application for a general rate case in the present proceeding.

2 **Q. HAVE YOU PREPARED AN ANALYSIS THAT INCLUDES THREE**
3 **YEARS OF SAMPLE BILLING DATA IN ACCORDANCE WITH**
4 **RULE R7-40?**

5 A. Yes. An analysis that includes three-years of customer billing data is
6 provided as:

- 7 • Haddad Exhibit 4A – ANC Water Residential
- 8 • Haddad Exhibit 4B – ANC Water Irrigation
- 9 • Haddad Exhibit 4C – ANC Water Commercial
- 10 • Haddad Exhibit 5A – Brookwood Residential
- 11 • Haddad Exhibit 5B – Brookwood Irrigation
- 12 • Haddad Exhibit 5C – Brookwood Commercial
- 13 • Haddad Exhibit 6A – Fairways Water Residential
- 14 • Haddad Exhibit 6B – Fairways Water Irrigation
- 15 • Haddad Exhibit 6C – Fairways Water Commercial

16 **Q. DOES YOUR PROPOSAL INCLUDE A “COLLAR” TO DETERMINE**
17 **A THRESHOLD TO USE BEFORE A CUSTOMER REFUND OR**
18 **SURCHARGE IS INITIATED?**

19 A. Yes. We propose that a CAM refund or surcharge only be issued if the
20 actual consumption for the true up period is greater than or less than 1% of
21 the average customer consumption used in rate design. To reduce the
22 need to make small refunds or surcharges, Aqua proposes no adjustments

1 be made for variances within the 1% threshold. (See Haddad Exhibit 2 for
2 the estimated revenue impact for a 1% adjustment on each of Aqua's three
3 water rate entities.)

4 **Q. DO YOU OFFER AN EXHIBIT WHICH ILLUSTRATES THE CAM**
5 **TRUE-UP CALCULATION?**

6 A. Yes. Haddad Exhibit 3 reflects a sample CAM true-up calculation. This
7 sample is not intended to show all possible scenarios; it is just illustrative
8 for the assumptions used in the sample.

9 **Q. ARE THERE ADDITIONAL CUSTOMERS NOT SPECIFICALLY**
10 **IDENTIFIED IN RULES R7-40 THAT SHOULD ALSO BE EXCLUDED**
11 **FROM THE CAM?**

12 A. Yes. Customers currently included in the Conservation rate pilot (i.e.,
13 Bayleaf, Arbor Run, Merion and Pebble Bay) have a similar, but separate,
14 revenue true-up mechanism already in place, which would continue
15 separately from a CAM. For this reason, these customers should be
16 excluded from the calculations and proposed CAM adjustments as long as
17 they continue to be part of the Conservation Pilot Program.

18 **Q. IS THIS TESTIMONY TRUE AND ACCURATE TO THE BEST OF YOUR**
19 **KNOWLEDGE, INFORMATION, AND BELIEF?**

20 A. Yes.

21 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

22 A. Yes.

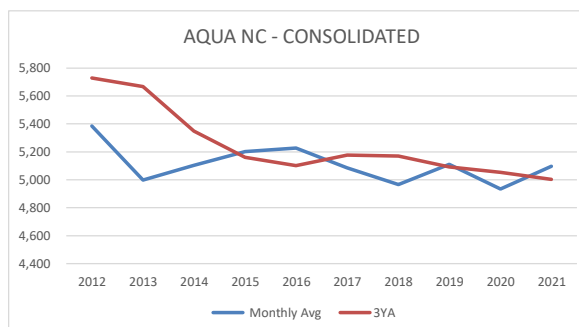
W-218 SUB 573
HADDAD EXHIBIT 1
Average Consumption by Water Rate Entity

CONSOLIDATED

Calendar Year	Annual Cust Monthly Avg	Prior* 3YA	GPM Pct Ch	3YA Pct Ch	Comp to 3YA
2012	5,385	5,728			94.0%
2013	4,997	5,666	-7.2%	-1.1%	88.2%
2014	5,103	5,349	2.1%	-5.6%	95.4%
2015	5,201	5,160	1.9%	-3.5%	100.8%
2016	5,227	5,101	0.5%	-1.1%	102.5%
2017	5,085	5,178	-2.7%	1.5%	98.2%
2018	4,965	5,171	-2.4%	-0.1%	96.0%
2019	5,111	5,091	2.9%	-1.5%	100.4%
2020	4,935	5,054	-3.5%	-0.7%	97.6%
2021	5,096	5,003	3.3%	-1.0%	101.9%
CAGR	-0.61%	-1.49%			

*Rates are based on previous 3-year average

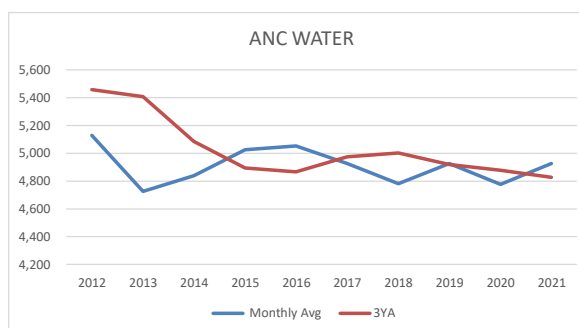
Each year is being compared to the 3YA for the prior three years.

**ANC WATER**

Calendar Year	Annual Cust Monthly Avg	Prior* 3YA	GPM Pct Ch	3YA Pct Ch	Comp to 3YA
2012	5,128	5,459			93.9%
2013	4,727	5,408	-7.8%	-0.9%	87.4%
2014	4,839	5,085	2.4%	-6.0%	95.2%
2015	5,024	4,895	3.8%	-3.7%	102.6%
2016	5,054	4,865	0.6%	-0.6%	103.9%
2017	4,927	4,974	-2.5%	2.2%	99.1%
2018	4,779	5,001	-3.0%	0.6%	95.6%
2019	4,927	4,919	3.1%	-1.6%	100.2%
2020	4,777	4,878	-3.0%	-0.8%	97.9%
2021	4,926	4,828	3.1%	-1.0%	102.0%
CAGR	-0.45%	-1.36%			

*Rates are based on previous 3-year average

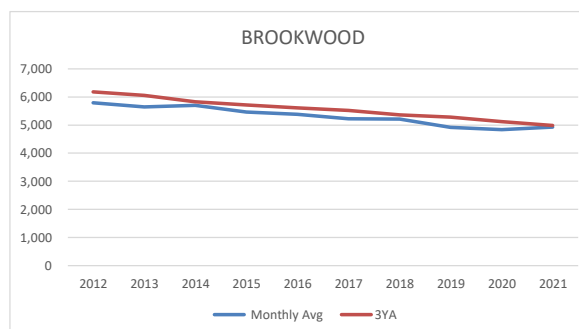
Each year is being compared to the 3YA for the prior three years.

**BROOKWOOD**

Calendar Year	Annual Cust Monthly Avg	Prior* 3YA	GPM Pct Ch	3YA Pct Ch	Comp to 3YA
2012	5,791	6,184			93.6%
2013	5,644	6,057	-2.5%	-2.1%	93.2%
2014	5,707	5,827	1.1%	-3.8%	97.9%
2015	5,466	5,715	-4.2%	-1.9%	95.7%
2016	5,382	5,606	-1.5%	-1.9%	96.0%
2017	5,230	5,518	-2.8%	-1.6%	94.8%
2018	5,219	5,360	-0.2%	-2.9%	97.4%
2019	4,920	5,277	-5.7%	-1.5%	93.2%
2020	4,834	5,122	-1.8%	-2.9%	94.4%
2021	4,923	4,990	1.9%	-2.6%	98.7%
CAGR	-1.79%	-2.36%			

*Rates are based on previous 3-year average

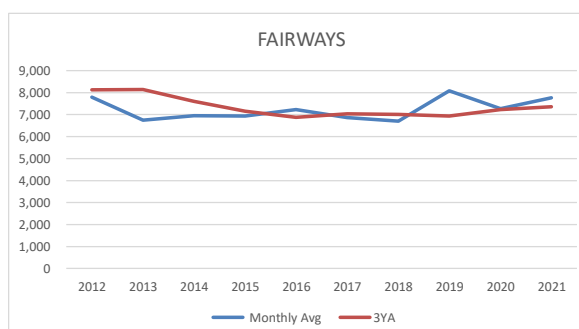
Each year is being compared to the 3YA for the prior three years.

**FAIRWAYS**

Calendar Year	Annual Cust Monthly Avg	Prior* 3YA	GPM Pct Ch	3YA Pct Ch	Comp to 3YA
2012	7,791	8,125			95.9%
2013	6,749	8,139	-13.4%	0.2%	82.9%
2014	6,941	7,597	2.8%	-6.7%	91.4%
2015	6,932	7,151	-0.1%	-5.9%	96.9%
2016	7,234	6,876	4.4%	-3.8%	105.2%
2017	6,863	7,039	-5.1%	2.4%	97.5%
2018	6,700	7,008	-2.4%	-0.4%	95.6%
2019	8,080	6,923	20.6%	-1.2%	116.7%
2020	7,274	7,233	-10.0%	4.5%	100.6%
2021	7,758	7,359	6.6%	1.7%	105.4%
CAGR	-0.05%	-1.09%			

*Rates are based on previous 3-year average

Each year is being compared to the 3YA for the prior three years.



W-218 SUB 573

HADDAD EXHIBIT 2

1% Revenue Variance by Water Rate Entity

	ANC Water	BW Water	FW Water
Approximate '21 Revenue	\$40,200,000	\$6,600,000	\$2,200,000
Approximate Usage Revenue %	60%	60%	60%
Approximate Usage revenue \$	\$ 24,120,000	\$ 3,960,000	\$ 1,320,000
1% Variance	\$ 241,200	\$ 39,600	\$ 13,200

W-218 SUB 573
HADDAD CAM EXHIBIT 3
SAMPLE CAM CALCULATION

Line#	(a)	(b) <u>Authorized</u>	(c) <u>Year 1</u>	(d) <u>Year 2</u>	(e) <u>Year 3</u>	(f) <u>Year 4</u>	(g) <u>Year 5</u>
Customers							
1	Annual Customer Bills	84,000	85,000	86,000	87,000	88,000	89,000
2	Avg Gallons per Bill per Month	5,100	5,125	5,200	5,150	5,000	5,050 [1]
3							
4	Avg Gallons/Customer/Month Variance		0.5%	2.0%	1.0%	(2.0%)	(1.0%) [2]
5	Proposed Collar		1.0%	1.0%	1.0%	1.0%	1.0%
6	(Surcharge)/Surcredit		0.0%	2.0%	0.0%	(2.0%)	0.0% [3]
7							
8	Gallons (Annualized)						
9	Annualized Gallons	5,140,800,000	5,227,500,000	5,366,400,000	5,376,600,000	5,280,000,000	5,393,400,000
10							
11	Rates						
12	Usage Rate per 1,000 Gallons	\$ 6.0000	\$ 6.0000	\$ 6.0000	\$ 6.0000	\$ 6.0000	\$ 6.0000
13	Surcharge per 1,000 gallon rate			\$ -	\$ -	\$ -	\$ 0.1176 [4]
14	Credit per 1,000 gallon rate			\$ -	\$ (0.1176)	\$ -	\$ - [5]
15							
16	CAM Calculation						
17	Revenue (Over)/Under (if collar is exceeded)		\$ -	\$ (631,341)	\$ -	\$ 621,176	\$ - [6]
18	Surcharge/(Surcredit) Percentage	\$ -	\$ -	\$ (0.1176)	\$ -	\$ 0.1176	\$ - [7]
19							
20	Revenue						
21	Authorized Usage Revenue	\$ 30,844,800	\$ 31,212,000	\$ 31,579,200	\$ 31,946,400	\$ 32,313,600	\$ 32,680,800 [8]
22							
23	Actual Usage Revenue		\$ 31,365,000	\$ 32,198,400	\$ 32,259,600	\$ 31,680,000	\$ 32,360,400 [9]
24	Surcharge		\$ -	\$ -	\$ -	\$ -	\$ 634,518 [10]
25	Surcredit		\$ -	\$ -	\$ (632,541)	\$ -	\$ - [11]
26	Total Usage Revenue	\$ 30,844,800	\$ 31,365,000	\$ 32,198,400	\$ 31,627,059	\$ 31,680,000	\$ 32,994,918 [12]

[1] line 9 gallons divided by line 1 bills

[2] gallons per month actual / gallons per month authorized

[3] if line 4 is higher than line 5, then use line 4 percentage, otherwise no surcharge/credit

[4] calculated surcharge per Kgal from prior year's results, on line 18

[5] calculated surcredit per Kgal from prior year's results, on line 18

[6] line 6 x line 12 x (line 9 / 1,000)

[7] line 17 / line 9 x 1,000

[8] current year annual bills (line 1) x 5,100 gallons (authorized) x 12 / 1,000 x usage rate (line 12)

[9] line 9 / 1,000 x line 18

[10] line 9 / 1,000 x line 13

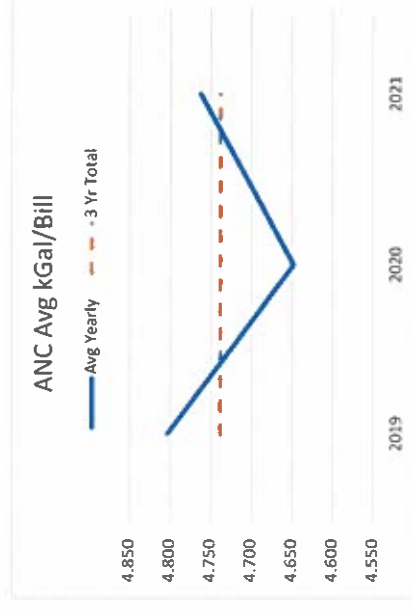
[11] line 9 / 1,000 x line 14

[12] line 23 + line 24 + line 25

Docket W-218 Sub 573
Haddad Exhibit 4A
Three-Year Billing Data Analysis

ANC Water - Residential

Line No.	Month-Year	(a)	(b)	(c)	(d)	Year
		Month-Year	Bills (non FR)	Usage kGals	Avg Usg/Bill	
1	Jan-2019		46,445	182,612	3,932	2019
2	Feb-2019		46,987	177,919	3,787	2019
3	Mar-2019		46,934	174,764	3,724	2019
4	Apr-2019		47,096	183,815	3,903	2019
5	May-2019		47,333	207,092	4,375	2019
6	Jun-2019		47,538	299,995	6,311	2019
7	Jul-2019		47,693	279,234	5,855	2019
8	Aug-2019		47,579	276,916	5,820	2019
9	Sep-2019		47,710	274,703	5,758	2019
10	Oct-2019		46,988	261,336	5,562	2019
11	Nov-2019		47,022	228,129	4,852	2019
12	Dec-2019		46,971	173,931	3,703	2019
13			566,296	2,720,446	4,804	2019
14	Jan-2020		46,916	195,501	4,167	2020
15	Feb-2020		47,093	182,792	3,882	2020
16	Mar-2020		46,637	170,849	3,663	2020
17	Apr-2020		47,198	209,821	4,446	2020
18	May-2020		47,152	230,914	4,897	2020
19	Jun-2020		47,306	233,384	4,933	2020
20	Jul-2020		47,462	287,622	6,060	2020
21	Aug-2020		48,070	274,010	5,700	2020
22	Sep-2020		47,549	239,055	5,028	2020
23	Oct-2020		46,163	211,635	4,585	2020
24	Nov-2020		49,281	222,522	4,515	2020
25	Dec-2020		47,730	184,546	3,866	2020
26			568,557	2,642,651	4,648	2020
27	Jan-2021		47,697	214,920	4,506	2021
28	Feb-2021		47,720	178,793	3,747	2021
29	Mar-2021		47,835	171,447	3,584	2021
30	Apr-2021		47,879	206,539	4,314	2021
31	May-2021		47,777	250,462	5,242	2021
32	Jun-2021		48,244	258,364	5,355	2021
33	Jul-2021		47,961	270,362	5,637	2021
34	Aug-2021		47,937	250,925	5,234	2021
35	Sep-2021		48,075	272,058	5,659	2021
36	Oct-2021		47,964	246,060	5,130	2021
37	Nov-2021		47,849	217,598	4,548	2021
38	Dec-2021		48,555	203,511	4,191	2021
39			575,493	2,741,039	4,763	2021
40	3 Yr Total		1,710,346	8,104,136	4,738	
41						
42	3 Yr Average vs. Test Year					-0.52%
43	(excludes Tier areas)					



Docket W-218 Sub 573
Haddad Exhibit 4B
Three-Year Billing Data Analysis

ANC Water - Irrigation

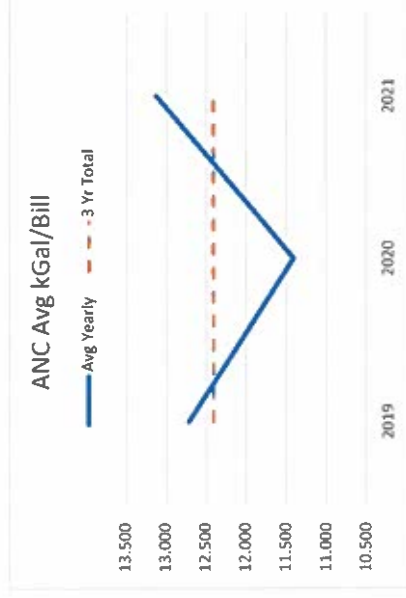
Line No.	(a) Month-Year	(b) Bills (non FR)	(c) Usage kGals	(d) Avg Usg/Bill	Year
1	Jan-2019	574	481	0.838	2019
2	Feb-2019	574	(191)	(0.333)	2019
3	Mar-2019	586	184	0.314	2019
4	Apr-2019	595	814	1.368	2019
5	May-2019	595	2,975	5.000	2019
6	Jun-2019	622	9,285	14.928	2019
7	Jul-2019	636	9,804	15.415	2019
8	Aug-2019	652	9,679	14.845	2019
9	Sep-2019	642	9,074	14.134	2019
10	Oct-2019	406	5,462	13.453	2019
11	Nov-2019	410	3,536	8.624	2019
12	Dec-2019	394	588	1.492	2019
13		6,686	51,691	7.731	2019
14	Jan-2020	378	288	0.762	2020
15	Feb-2020	390	448	1.149	2020
16	Mar-2020	373	510	1.367	2020
17	Apr-2020	399	483	1.211	2020
18	May-2020	380	1,653	4.350	2020
19	Jun-2020	412	2,656	6.447	2020
20	Jul-2020	420	4,199	9.998	2020
21	Aug-2020	422	3,969	9.405	2020
22	Sep-2020	418	3,330	7.967	2020
23	Oct-2020	405	2,636	6.509	2020
24	Nov-2020	416	2,640	6.346	2020
25	Dec-2020	398	665	1.671	2020
26		4,811	23,477	4.880	2020
27	Jan-2021	401	212	0.529	2021
28	Feb-2021	399	125	0.313	2021
29	Mar-2021	402	199	0.495	2021
30	Apr-2021	409	473	1.156	2021
31	May-2021	417	2,472	5.928	2021
32	Jun-2021	415	3,944	9.504	2021
33	Jul-2021	414	4,385	10.592	2021
34	Aug-2021	416	4,133	9.935	2021
35	Sep-2021	412	4,593	11.148	2021
36	Oct-2021	417	4,599	11.029	2021
37	Nov-2021	402	2,816	7.005	2021
38	Dec-2021	400	1,182	2.955	2021
39		4,904	29,133	5.941	2021
40	3 Yr Total	16,401	104,301	6.359	
41					
42	3 Yr Average vs. Test Year				7.05%
43	(excludes Tier areas)				



Docket W-218 Sub 573
Haddad Exhibit 4C
Three-Year Billing Data Analysis

ANC Water - Commercial

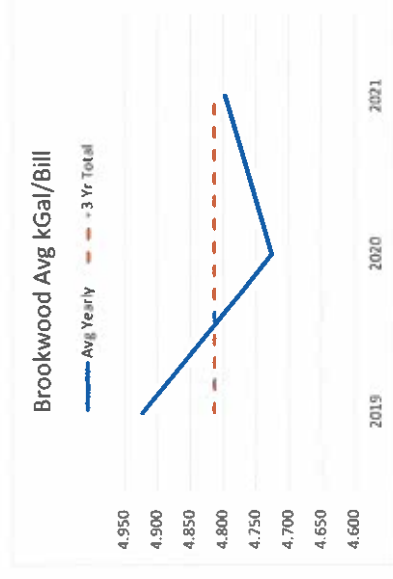
Line No.	(a) Month-Year	(b) Bills (non FR)	(c) Usage kGals	(d) Avg Usg/Bill	Year
1	Jan-2019	288	2,645	9,184	2019
2	Feb-2019	290	2,747	9,472	2019
3	Mar-2019	309	3,031	9,809	2019
4	Apr-2019	305	3,191	10,462	2019
5	May-2019	316	4,589	14,522	2019
6	Jun-2019	312	5,265	16,875	2019
7	Jul-2019	321	4,917	15,318	2019
8	Aug-2019	314	4,610	14,682	2019
9	Sep-2019	303	5,456	18,007	2019
10	Oct-2019	331	4,930	14,894	2019
11	Nov-2019	314	2,911	9,271	2019
12	Dec-2019	317	3,032	9,565	2019
13		3,720	47,324	12,722	2019
14	Jan-2020	310	2,719	8,771	2020
15	Feb-2020	322	2,627	8,158	2020
16	Mar-2020	313	2,840	9,073	2020
17	Apr-2020	313	3,133	10,010	2020
18	May-2020	307	3,841	12,511	2020
19	Jun-2020	318	3,833	12,053	2020
20	Jul-2020	319	5,774	18,100	2020
21	Aug-2020	321	4,371	13,617	2020
22	Sep-2020	314	4,207	13,398	2020
23	Oct-2020	323	3,361	10,406	2020
24	Nov-2020	319	3,563	11,169	2020
25	Dec-2020	310	2,959	9,545	2020
26		3,789	43,228	11,409	2020
27	Jan-2021	309	3,380	10,939	2021
28	Feb-2021	310	2,513	8,106	2021
29	Mar-2021	309	2,741	8,871	2021
30	Apr-2021	314	3,810	12,134	2021
31	May-2021	315	4,797	15,229	2021
32	Jun-2021	308	4,844	15,727	2021
33	Jul-2021	308	5,407	17,555	2021
34	Aug-2021	318	6,915	21,745	2021
35	Sep-2021	299	3,200	10,702	2021
36	Oct-2021	299	4,131	13,816	2021
37	Nov-2021	308	2,916	9,468	2021
38	Dec-2021	306	3,958	12,935	2021
39		3,703	48,612	13,128	2021
40		11,212	139,164	12,412	
41	3 Yr Total				
42	3 Yr Average vs. Test Year				-5.45%
43	(excludes Tier areas)				



Docket W-218 Sub 573
Haddad Exhibit 5A
Three-Year Billing Data Analysis

Brookwood Water - Residential

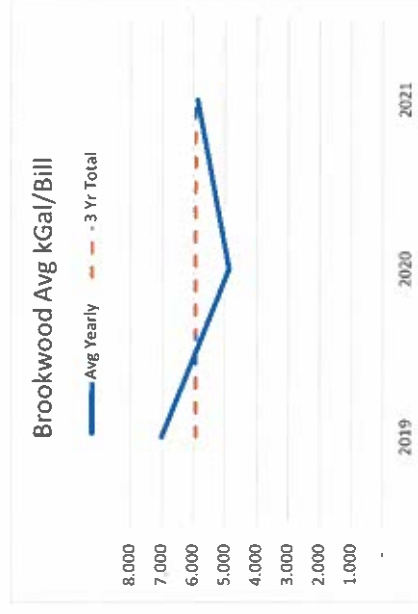
Line No.	(a) Month-Year	(b) Bills (non FR)	(c) Usage kGals	(d) Avg Usg/Bill	Year
1	Jan	11,360	56,375	4,963	2019
2	Feb	11,352	48,153	4,242	2019
3	Mar	11,544	42,727	3,701	2019
4	Apr	11,718	55,037	4,697	2019
5	May	10,984	56,794	5,171	2019
6	Jun	11,898	75,638	6,357	2019
7	Jul	12,054	69,242	5,744	2019
8	Aug	12,054	62,962	5,223	2019
9	Sep	12,039	66,011	5,483	2019
10	Oct	11,932	54,747	4,588	2019
11	Nov	11,835	56,346	4,761	2019
12	Dec	11,736	47,541	4,051	2019
13		<u>140,506</u>	<u>691,573</u>	<u>4,922</u>	2019
14	Jan	11,813	53,471	4,526	2020
15	Feb	11,949	49,899	4,176	2020
16	Mar	12,112	49,021	4,047	2020
17	Apr	12,115	55,732	4,600	2020
18	May	12,097	60,630	5,012	2020
19	Jun	12,264	59,173	4,825	2020
20	Jul	12,189	68,196	5,595	2020
21	Aug	12,465	69,570	5,581	2020
22	Sep	12,359	62,902	5,090	2020
23	Oct	12,375	59,157	4,780	2020
24	Nov	12,356	53,755	4,351	2020
25	Dec	12,282	50,254	4,092	2020
26		<u>146,376</u>	<u>691,760</u>	<u>4,726</u>	2020
27	Jan	12,330	59,023	4,767	2021
28	Feb	12,279	49,365	4,020	2021
29	Mar	12,375	48,115	3,888	2021
30	Apr	12,363	55,853	4,518	2021
31	May	12,405	64,935	5,235	2021
32	Jun	12,323	67,120	5,447	2021
33	Jul	12,325	63,724	5,170	2021
34	Aug	12,348	63,146	5,114	2021
35	Sep	12,342	67,091	5,436	2021
36	Oct	12,407	63,663	5,131	2021
37	Nov	12,409	55,132	4,443	2021
38	Dec	12,465	54,440	4,367	2021
39		<u>148,371</u>	<u>711,607</u>	<u>4,796</u>	2021
40	3 Yr Total	<u>435,253</u>	<u>2,094,940</u>	<u>4,813</u>	
41	3 Yr Average vs. Test Year				0.35%
42					
43					



Docket W-218 Sub 573
Haddad Exhibit 5B
Three-Year Billing Data Analysis

Brookwood Water - Irrigation

Line No.	(a) Month-Year	(b) Bills (non FR)	(c) Usage kGals	(d) Avg Usg/Bill	Year
1	Jan	33	49	1.485	2019
2	Feb	34	7	0.206	2019
3	Mar	35	(93)	(2.657)	2019
4	Apr	26	17	0.654	2019
5	May	38	404	10.632	2019
6	Jun	38	588	15.474	2019
7	Jul	39	671	17.205	2019
8	Aug	39	405	10.385	2019
9	Sep	39	421	10.795	2019
10	Oct	38	320	8.421	2019
11	Nov	36	163	4.528	2019
12	Dec	23	(17)	(0.739)	2019
13		418	2,935	7.022	2019
14	Jan	29	15	0.517	2020
15	Feb	29	(9)	(0.310)	2020
16	Mar	29	100	3.448	2020
17	Apr	33	97	2.939	2020
18	May	29	147	5.069	2020
19	Jun	36	173	4.806	2020
20	Jul	34	277	8.147	2020
21	Aug	35	351	10.029	2020
22	Sep	35	303	8.657	2020
23	Oct	36	214	5.944	2020
24	Nov	34	158	4.647	2020
25	Dec	33	88	2.667	2020
26		392	1,914	4.883	2020
27	Jan	33	17	0.515	2021
28	Feb	33	2	0.061	2021
29	Mar	34	2	0.059	2021
30	Apr	33	62	1.879	2021
31	May	36	248	6.889	2021
32	Jun	37	438	11.838	2021
33	Jul	38	428	11.263	2021
34	Aug	36	337	9.361	2021
35	Sep	36	397	11.028	2021
36	Oct	36	305	8.472	2021
37	Nov	35	185	5.286	2021
38	Dec	32	47	1.469	2021
39		419	2,468	5.890	2021
40	3 Yr Total	1,229	7,317	5.954	
41	3 Yr Average vs. Test Year			1.08%	



Docket W-218 Sub 573
Haddad Exhibit 5C
Three-Year Billing Data Analysis

Brookwood Water - Commercial

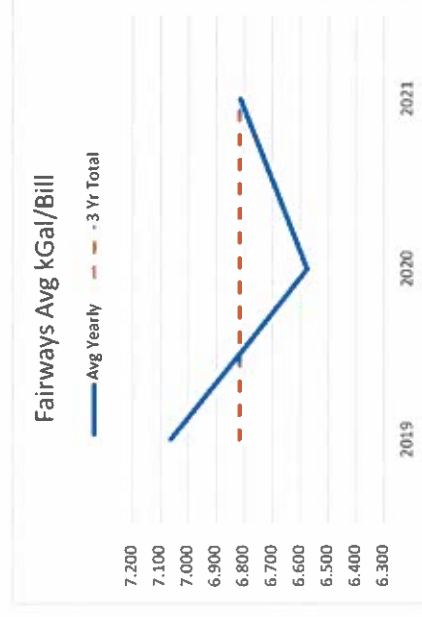
Line No.	(a) Month-Year	(b) Bills (non FR)	(c) Usage kGals	(d) Avg Usg/Bill	Year
1	Jan	147	2,051	13.952	2019
2	Feb	152	2,048	13.474	2019
3	Mar	153	2,193	14.333	2019
4	Apr	163	2,659	16.313	2019
5	May	137	2,275	16.606	2019
6	Jun	143	1,979	13.839	2019
7	Jul	158	2,048	12.962	2019
8	Aug	165	2,223	13.473	2019
9	Sep	157	2,734	17.414	2019
10	Oct	159	2,341	14.723	2019
11	Nov	163	2,452	15.043	2019
12	Dec	153	2,093	13.680	2019
13		1,850	27,096	14.646	2019
14	Jan	161	2,365	14.689	2020
15	Feb	129	1,290	10.000	2020
16	Mar	170	1,948	11.459	2020
17	Apr	175	9,809	56.051	2020
18	May	165	1,679	10.176	2020
19	Jun	183	2,276	12.437	2020
20	Jul	162	2,128	13.136	2020
21	Aug	162	2,581	15.932	2020
22	Sep	181	2,884	15.934	2020
23	Oct	166	2,234	13.458	2020
24	Nov	168	2,328	13.857	2020
25	Dec	164	1,999	12.189	2020
26		1,986	33,521	16.879	2020
27	Jan	166	2,204	13.277	2021
28	Feb	165	1,830	11.091	2021
29	Mar	161	1,784	11.081	2021
30	Apr	157	2,252	14.344	2021
31	May	170	2,647	15.571	2021
32	Jun	163	2,380	14.601	2021
33	Jul	163	2,468	15.141	2021
34	Aug	164	2,926	17.841	2021
35	Sep	160	3,570	22.313	2021
36	Oct	161	3,387	21.037	2021
37	Nov	165	2,824	17.115	2021
38	Dec	161	2,509	15.584	2021
39		1,956	30,781	15.737	2021
40	3 Yr Total	5,792	91,398	15.780	
41	3 Yr Average vs. Test Year				0.28%



Docket W-218 Sub 573
Haddad Exhibit 6A
Three-Year Billing Data Analysis

Fairways Water - Residential

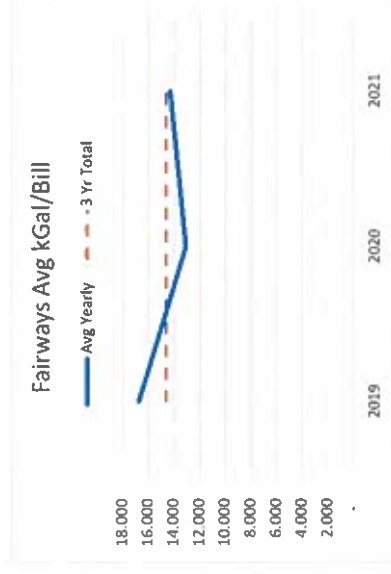
Line No.	(a) Month-Year	(b) Bills (non FR)	(c) Usage kGals	(d) Avg Usg/Bill	Year
1	Jan	4,128	15,998	3,875	2019
2	Feb	4,131	14,978	3,626	2019
3	Mar	4,083	14,451	3,539	2019
4	Apr	4,164	19,544	4,694	2019
5	May	4,140	30,514	7,371	2019
6	Jun	4,197	48,051	11,449	2019
7	Jul	4,178	39,194	9,381	2019
8	Aug	4,212	45,493	10,801	2019
9	Sep	4,188	39,591	9,453	2019
10	Oct	4,188	36,660	8,754	2019
11	Nov	4,211	30,775	7,308	2019
12	Dec	4,212	18,238	4,330	2019
13		50,032	353,487	7,065	2019
14	Jan	4,191	14,875	3,549	2020
15	Feb	4,101	15,015	3,661	2020
16	Mar	4,199	14,693	3,499	2020
17	Apr	4,232	24,220	5,723	2020
18	May	4,198	33,141	7,894	2020
19	Jun	4,224	35,853	8,488	2020
20	Jul	4,247	38,647	9,100	2020
21	Aug	4,259	44,159	10,368	2020
22	Sep	4,238	34,491	8,139	2020
23	Oct	4,246	31,046	7,312	2020
24	Nov	4,267	28,305	6,603	2020
25	Dec	4,246	18,716	4,408	2020
26		50,668	333,161	6,575	2020
27	Jan	4,247	19,049	4,485	2021
28	Feb	4,262	15,210	3,569	2021
29	Mar	4,278	15,107	3,531	2021
30	Apr	4,268	23,060	5,403	2021
31	May	4,308	42,520	9,870	2021
32	Jun	4,332	43,801	10,111	2021
33	Jul	4,362	39,440	9,042	2021
34	Aug	4,311	37,728	8,752	2021
35	Sep	4,354	36,553	8,395	2021
36	Oct	4,348	31,902	7,337	2021
37	Nov	4,322	27,276	6,311	2021
38	Dec	4,314	20,752	4,810	2021
39		51,706	352,398	6,815	2021
40	3 Yr Total	152,406	1,039,046	6,818	
41	3 Yr Average vs. Test Year			0.03%	



Docket W-218 Sub 573
Haddad Exhibit 6B
Three-Year Billing Data Analysis

Fairways Water - Irrigation

Line No.	(a) Month-Year	(b) Bills (non FR)	(c) Usage kGals	(d) Avg Usg/Bill	Year
1	Jan	429	1,373	3,200	2019
2	Feb	429	1,223	2,851	2019
3	Mar	419	766	1,828	2019
4	Apr	439	1,367	3,114	2019
5	May	453	8,125	17,936	2019
6	Jun	452	14,586	32,270	2019
7	Jul	479	12,478	26,050	2019
8	Aug	473	15,545	32,865	2019
9	Sep	470	13,031	27,726	2019
10	Oct	479	13,167	27,489	2019
11	Nov	476	9,108	19,134	2019
12	Dec	476	1,157	2,431	2019
13		5,474	91,926	16,793	2019
14	Jan	470	392	0,834	2020
15	Feb	474	182	0,384	2020
16	Mar	489	945	1,933	2020
17	Apr	510	5,042	9,886	2020
18	May	504	8,339	16,546	2020
19	Jun	515	8,745	16,981	2020
20	Jul	520	11,259	21,652	2020
21	Aug	524	12,631	24,105	2020
22	Sep	533	11,585	21,735	2020
23	Oct	535	9,727	18,181	2020
24	Nov	521	8,675	16,651	2020
25	Dec	555	3,076	5,542	2020
26		6,150	80,398	13,105	2020
27	Jan	542	834	1,539	2021
28	Feb	533	(490)	(0,919)	2021
29	Mar	533	856	1,606	2021
30	Apr	548	6,314	11,522	2021
31	May	586	13,493	23,026	2021
32	Jun	587	11,913	20,295	2021
33	Jul	591	13,956	23,614	2021
34	Aug	576	12,347	21,436	2021
35	Sep	625	14,392	23,027	2021
36	Oct	601	11,616	19,328	2021
37	Nov	606	10,111	16,685	2021
38	Dec	607	4,090	6,738	2021
39		6,935	99,432	14,338	2021
40	3 Yr Total	18,559	271,956	14,654	
41	3 Yr Average vs. Test Year			2.20%	



Docket W-218 Sub 573
Haddad Exhibit 6C
Three-Year Billing Data Analysis

Fairways Water - Commercial

Line No.	(a) Month-Year	(b) Bills (non FR)	(c) Usage kGals	(d) Avg Usg/Bill	Year
1	Jan	69	1,041	15,087	2019
2	Feb	64	908	14,188	2019
3	Mar	64	944	14,750	2019
4	Apr	66	1,141	17,288	2019
5	May	67	1,199	17,896	2019
6	Jun	67	1,762	26,299	2019
7	Jul	55	1,494	27,164	2019
8	Aug	65	1,983	30,508	2019
9	Sep	69	1,655	23,986	2019
10	Oct	72	1,768	24,556	2019
11	Nov	78	1,868	23,949	2019
12	Dec	81	1,304	16,099	2019
13		817	17,067	20,890	2019
14	Jan	61	(106)	(1,738)	2020
15	Feb	63	944	14,984	2020
16	Mar	68	903	13,279	2020
17	Apr	70	730	10,429	2020
18	May	70	1,018	14,543	2020
19	Jun	69	1,491	21,609	2020
20	Jul	67	1,441	21,507	2020
21	Aug	70	1,601	22,871	2020
22	Sep	66	1,376	20,848	2020
23	Oct	69	1,349	19,551	2020
24	Nov	74	1,431	19,338	2020
25	Dec	69	920	13,333	2020
26		816	13,098	16,051	2020
27	Jan	72	1,135	15,764	2021
28	Feb	71	1,034	14,563	2021
29	Mar	68	1,029	15,132	2021
30	Apr	72	1,186	16,472	2021
31	May	70	1,615	23,071	2021
32	Jun	68	2,367	34,809	2021
33	Jul	71	1,956	27,549	2021
34	Aug	70	2,012	28,743	2021
35	Sep	71	1,646	23,183	2021
36	Oct	69	1,393	20,188	2021
37	Nov	69	1,619	23,464	2021
38	Dec	65	1,929	29,677	2021
39		836	18,921	22,633	2021
40	3 Yr Total	2,469	49,086	19,881	
41					
42	3 Yr Average vs. Test Year				-12.16%
43					

